

	Connecticut Children's Medical Center - Policy and Procedure Manual		
	Leadership	Date Effective:	April 26, 2011
	Code of Conduct	Date of Origin:	April 01, 1996
	Approved By: Corporate Compliance Committee, Board of Directors	Date Approved:	April 21, 2011

Introduction

Connecticut Children's Medical Center (Connecticut Children's) is dedicated to improving the physical and emotional health of children through family-centered care, research, education and advocacy. We embrace discovery, teamwork, integrity and excellence in all that we do.

In pursuit of our mission, we promote the following values:

- **Family-Centered Care**

We place our patients and their families at the center of all we do.

We partner with families and embrace their involvement in all aspects of service and care

- **Integrity**

We are open, honest and ethical.

We take responsibility for our actions and fulfill our commitments. We admit our mistakes and learn from them.

- **Discovery**

We look for new ways of doing things.

We ask questions, invest in research, find answers and share new knowledge with the world.

- **Quality**

We come to work every day with the goal of making things better than the day before.

We pursue the highest standards, the safest care in the safest workplace and the best outcomes in everything we do.

- **Teamwork**

We live by the statement "I care if you succeed."

We work together to achieve our goals. We value one another and celebrate our successes.

- **Respect**

We honor the dignity and value of every person and take pride in our organization.

We trust each other. We treat each other as we wish to be treated and value our workplace as our home. We embrace diversity and the unique contributions that each person brings to Connecticut Children's.

To assist in decision-making and actions toward our mission and core values, we have established the Connecticut Children's Code of Conduct to be followed by all employees, professional staff, medical staff, contractors, vendors and agents of Connecticut Children's. No one, regardless of position or function, may allow personal preference, inconvenience, or coercion to compromise any terms of the Code of Conduct, or pressure others to do so. We affirm that the Code of Conduct establishes the general policies and procedures with which all Connecticut Children's employees must comply as a condition of employment, and that any violation of the Code of Conduct may result in termination or suspension or removal of privileges. We also affirm that in some cases, non-compliance with the Code of Conduct may also be violating civil and/or criminal law and such individuals may be prosecuted accordingly. Nothing in this Code of Conduct is intended to provide, nor should be construed as providing, any additional employment rights to staff or others.

	Connecticut Children's Medical Center - Policy and Procedure Manual		
	Leadership	Date Effective:	April 26, 2011
	Code of Conduct	Date of Origin:	April 01, 1996
	Approved By: Corporate Compliance Committee, Board of Directors	Date Approved:	April 21, 2011

Code of Conduct Administration

The Compliance Department, in collaboration with Connecticut Children's Leadership, is responsible for managing and oversight of the Code of Conduct. We encourage any individual who has a question regarding the applicability or interpretation of the Code of Conduct to direct the question to the Director of Compliance in person, in writing, through email, or by telephone.

We strongly emphasize that suspected violations or concerns of quality, patient safety or waste, fraud and abuse be reported immediately. Reporting enables us to investigate potential problems quickly and take prompt action to deal with them. Reports may be made on a confidential basis to the Corporate Compliance Hotline by calling 1-877-363-3073 (or 1-800-297-8592 for Spanish). As a matter of policy, we will not discipline or subject to retaliatory action or retribution any individual because he/she made a report in good faith or participated in an investigation. Where possible, we will protect the confidentiality of the individual making the report.

Code of Conduct Violations

Adherence to the Code of Conduct is a condition of employment and credentialing. Violations of this code or any policies or procedures that govern our business and our interactions with our patients will result in disciplinary action, up to and including termination of employment or staff privileges, as applicable. Reports of suspected violations by a member of the Medical Staff will be referred to the Medical Staff Peer Review Committee for review and action. Reports of suspected violations by others will be referred to Compliance Department or Human Resources for review and action.

Code of Conduct Commitment

We, Connecticut Children's Medical Center leadership, employees and medical staff are dedicated to maintaining excellence and integrity in all aspects of our operations, professional and business conduct. Accordingly, we are committed to conformance with the highest ethical standards and compliance with all governing laws and regulations in the delivery of health care as well as in our business affairs and transactions with all that we serve and with whom we deal. It is our personal responsibility to honor this commitment in accordance with the terms of this Code of Conduct, and related policies, procedures and standards of Connecticut Children's.

We acknowledge that it is a condition of employment to comply with the Code of Conduct and other provisions set forth in the Compliance Program and other organizational programs, policies, and procedures.

At initial orientation, medical staff appointment, or service provision, we will sign an acknowledgement confirming that we have received and read the Code of Conduct and

	Connecticut Children's Medical Center - Policy and Procedure Manual		
	Leadership	Date Effective:	April 26, 2011
	Code of Conduct	Date of Origin:	April 01, 1996
	Approved By: Corporate Compliance Committee, Board of Directors	Date Approved:	April 21, 2011

understand the contents. Additionally, we will acknowledge the Code of Conduct during our annual performance review process and/or reappointment process.

Code of Conduct Essentials

At Connecticut Children's Medical Center, we adhere to the Code of Conduct essentials - "CCMC CONDUCT Excellence."

We:

- C** Comply with the law.
- C** Care for all patients with quality and excellence.
- M** Maintain a safe workplace.
- C** Conduct research and clinical trials ethically and legally.

- C** Confine (protect) confidential and proprietary information.
- O** Organize and retain accurate and complete records.
- N** Never knowingly or willfully commit fraud or abuse.
- D** Decline inappropriate gifts and gratuities.
- U** Use resources and assets appropriately.
- C** Control and avoid conflicts of interest.
- T** Take time to protect the environment.

Excellence!

Code of Conduct Elements

Family Centered Care

- We will consistently strive to partner with our patients and families keeping them informed about treatment benefits and alternatives and about the various risk factors associated with each treatment or procedure.
- We will provide access to care and treat patients and families without regard to race, ethnicity, color, sex, religious creed, national origin, ancestry, sexual orientation, civil union or marital status, economic status, mental retardation or disability including but not limited to blindness, age, veteran status, ability to pay or any other classification protected by law.
- We will provide patients and families with education and care that is relevant, appropriate, safe and in compliance with applicable professional, state and national standards.

	Connecticut Children's Medical Center - Policy and Procedure Manual		
	Leadership	Date Effective:	April 26, 2011
	Code of Conduct	Date of Origin:	April 01, 1996
	Approved By: Corporate Compliance Committee, Board of Directors	Date Approved:	April 21, 2011

- We will maintain accessible, complete and thorough records of patient and service information.
- We will provide medical screening, regardless of ability to pay, to patients who present and request services. If the patient has an emergent medical condition, we will treat the patient and will only transfer him/her after he/she has been stabilized. With respect to any patient who is in need of emergent hospitalization, we will not question the patient or his/her family concerning insurance, credit or payment of charges provided that the patient or family shall agree to supply such information promptly after the patient's admission.
- We will support and promote a continuous quality and performance improvement program and patient safety program throughout the organization, including the handling of all complaints (e.g., quality of care, patient safety, or billing issues) in a timely and confidential manner.
- We will put the interests of our patients above our own. We will accept it as our duty to not expose these patients, to not make them sicker. We will participate in the mandatory organizational employee immunization program.
- We will refer patients and families to and/or provide contact information about external regulatory agencies if a complaint or issue cannot be successfully resolved by Connecticut Children's (e.g., Joint Commission - complaint@jointcommission.org, (630) 792-5636).
- We will provide access to protective services, if requested or necessary.
- We will recognize the importance of family in our lives and will help to respond to and resolve issues that may be the source of conflict between family and work.

Discovery

- We will attend training and participate in educational and development activities to enhance our skills and growth.
- We will conduct clinical research per federal or agency-sponsored regulations, submit proposals involving human subjects for Institutional Review Board (IRB) review and approval, adhere to the highest professional standards of scientific integrity and reports of scholarly activities, and report and investigate concerns of actual or potential scholarly or scientific misconduct.
- We will exercise care over patents, trademarks, copyrights and computer software and will not improperly copy documents or computer programs in violation of copyright or licensing agreements.
- We will acknowledge and respect diversity within our organization and use it as a source of strength and opportunity. We will use our courage to speak out (OUCH!) against attitudes and behaviors related to demeaning comments, stereotypes and bias.

Integrity

	Connecticut Children's Medical Center - Policy and Procedure Manual		
	Leadership	Date Effective:	April 26, 2011
	Code of Conduct	Date of Origin:	April 01, 1996
	Approved By: Corporate Compliance Committee, Board of Directors	Date Approved:	April 21, 2011

- We will avoid accepting gratuities or gifts greater than “nominal” value (generally defined as a value of \$50 per year).
- We will avoid offering or giving money, services or other things of value with the expectation of influencing the judgment or decision making process of any purchaser, vendor, patient, family, governmental official or any other person.
- We will avoid soliciting tips, personal gratuities or gifts from patients, families or vendors and will always act to avoid even the appearance of undue or illegal influence upon us.
- We will conduct our business and scientific activities so as to avoid actual and/or possible conflicts of interest and will fully disclose any actual or potential conflicts.
- We will make and accept patient referrals and consultations based on patient needs, the personal choice of the patient and referring physician, and our ability to provide the services needed.
- We will not accept or provide any type of incentive for a referral.
- We will avoid giving out confidential or proprietary information and will avoid using any contract, document, computer program, price list, customer list, publication, product or piece of information for profit or in violation of patient, employee or organizational confidentiality.
- We will refrain from conduct that may violate fraud and abuse laws including those that prohibit: (1) the submission of false, fraudulent or misleading claims to any government entity or third party payor, including claims for services not rendered; or claims which do not otherwise comply with applicable program or contractual requirements; (2) direct or indirect payments in exchange for the referral of patients; and (3) making false representations to any person or entity in order to gain or retain participation in a program or to obtain payments for any service.
- We will comply with applicable antitrust laws and similar laws that regulate competition. Examples of conduct prohibited by the laws include (1) unfair trade practices including bribery, misappropriation of trade secrets, deception, intimidation or similar unfair practices; (2) agreements to fix prices, bid rigging, collusion (including price sharing) with competitors and/or vendors; and (3) boycotts, certain exclusive dealing and price discrimination agreements.
- We will refrain from making any agreement to contribute any of the organization's money, goods or services to any political candidate, party or organization in violation of the law.
- We will work with Government Relations office prior to undertaking any political activities on behalf of the organization.
- We will refrain from attempting to influence the decision-making process of governmental agencies or officials by an improper offer of any benefits or gifts.
- We will use the organization's tax exemption only for legitimate organizational activities and will avoid purchasing personal items through the organization's purchasing system.
- We will withhold appropriate taxes from staff wages.

	Connecticut Children's Medical Center - Policy and Procedure Manual		
	Leadership	Date Effective:	April 26, 2011
	Code of Conduct	Date of Origin:	April 01, 1996
	Approved By: Corporate Compliance Committee, Board of Directors	Date Approved:	April 21, 2011

- We will avoid compensation arrangements in excess of fair market value, will accurately report payments to appropriate taxing authorities, and will file all tax and information returns in a manner consistent with applicable laws.
- We will collect and not routinely waive any co-payments and deductibles in accordance with the terms of the third party contract, if applicable.
- We will address and respond to billing and coding inquiries and questions.
- We will correct any inaccuracies in billing (including overpayments) in a timely manner and will alert the payer and submit refunds as required by applicable laws and policies.
- We will bill and code for provider and facility services in accordance with billing policies and state and federal regulations, only to the extent that the services for which charges are being initiated were actually rendered to the patient and were medically necessary; were rendered by a medical professional with an appropriate license and not on a Sanctions and Exclusions Database (e.g., OIG, GSA); are supported with complete and accurate documentation in the medical record; are part of a payer-negotiated disease management program; were accurately coded per payer and government standards; and were billed in accordance with the terms of the third party contract, if applicable.
- We will accurately and honestly represent the organization in marketing, advertising and other activities and will not engage in any activity or scheme intended to defraud anyone or the organization of money, property or honest services.
- We will ensure our financial reports, accounting records, expense accounts, time records, research reports, and other such documents accurately and clearly represent the true nature of the underlying activity or transaction.
- We will refrain from working unauthorized overtime, deliberate work slowdown, or interfering with the work of others.
- We will utilize organizational resources for organizational purposes only, not for personal gain (e.g., telephone, computers, copiers, etc.).
- We will refrain from abandoning our clinical care responsibility or other organizational responsibility (e.g., leaving work without permission during a work assignment).
- We will refrain from gambling on Connecticut Children's premises and/or during work time.
- We will report to work clear from the influence of alcohol or drugs, and we will refrain from consuming, distributing, offering for sale or possessing alcohol or drugs on organizational premises.

Teamwork

- We will fully comply with the law and cooperate with any appropriate request for information or site visit by a government/regulatory agency (e.g., Department of Public Health, Joint Commission, Food and Drug Administration, Office of Inspector General, Occupational Safety and Health Administration, law enforcement).

	Connecticut Children's Medical Center - Policy and Procedure Manual		
	Leadership	Date Effective:	April 26, 2011
	Code of Conduct	Date of Origin:	April 01, 1996
	Approved By: Corporate Compliance Committee, Board of Directors	Date Approved:	April 21, 2011

- We will respond to regulatory investigations with open and accurate information. When preparing for a site visit/investigation, we will not destroy, conceal, or alter any documents.
- We will employ, grant medical staff privileges to, or contract with qualified personnel regardless of race, ethnicity, color, sex, national origin, ancestry, religious creed, age, mental retardation or physical disability, including but not limited to blindness, veteran status, sexual orientation, civil union or marital status.
- We will avoid utilizing “inside” information for any business activity conducted on behalf of the organization; all business relations will be conducted at arm’s length both in fact and in appearance.
- We will disclose personal relationships and business activities with contractor personnel that may be construed as influencing our performance or duties.
- We will avoid making derogatory remarks, gestures, or written entries about other individuals.
- We will not retaliate, punish, or conduct reprisals against anyone who reports a suspected violation of a law or regulation, or participates in an investigation of such matters.

Excellence

- We will employ individuals with proper and current credentials, experience and expertise, and free from active convictions and sanctions, necessary to perform their duties in a safe and effective manner.
- We will maintain the integrity and quality of our job performance, using work time to the benefit of our patients and families, at every level of the organization (e.g., we will not sleep during work time unless authorized).
- We will follow work assignments or follow instructions from management and/or leadership.
- We will maintain appropriate attendance standards (e.g., avoiding excessive tardiness or absenteeism).
- We will handle all patient information (protected health information) in accordance with HIPAA Privacy Standards and Security Standards and will store medical and billing records in a safe and secure place for the time required by law or policy.
- We will follow practices that reduce the spread of infection, such as washing hands, wearing personal protective equipment, following isolation procedures, and participating in the mandatory immunization program.
- We will make sure that medical waste and hazardous materials are handled, transported, and disposed of properly, including those that require precise description of the amount, concentration and makeup of hazardous materials or other regulated pollutants and regulated medical waste that are used, stored, discharged or generated.
- We will follow all laws, regulations, and policies related to environmental health and safety, including fire, chemical, biological, radiation, and electrical safety.

	Connecticut Children's Medical Center - Policy and Procedure Manual		
	Leadership	Date Effective:	April 26, 2011
	Code of Conduct	Date of Origin:	April 01, 1996
	Approved By: Corporate Compliance Committee, Board of Directors	Date Approved:	April 21, 2011

- We will handle, store and dispose of all drugs, pharmaceuticals, chemicals, and radioactive materials safely and maintain proper records.
- We will take reasonable steps to protect our assets against loss, theft or abuse; keep our workplace safe; free from weapons; free from smoke and tobacco use; avoid harming co-workers, patients, families, visitors, or ourselves; and understand our responsibilities during disasters, severe weather, and other emergencies.
- We will exhibit Connecticut Children's behavioral excellence to show that we care. We will:
 - Partner with families
 - Be creative
 - Pursue knowledge
 - Act professionally
 - Strive for improvement
 - Communicate effectively
 - Take ownership
 - Act with respect and honesty
- Examples of Code of Conduct violations include but are not limited to:
 - Written or verbal derogatory or inappropriate remarks
 - Abusive or degrading or profane language/comment
 - Willful failure to follow Medical Staff Bylaws, Rules and Regulations, or hospital policy
 - Inappropriate acceptance of gift or gratuity (e.g., vendor gift card)
 - Sexual harassment or inappropriate physical contact
 - Violent, reckless, threatening or intimidating behavior
 - Waste, fraud or abuse (e.g., knowingly submitting a fraudulent claim)
 - Willful failure to follow IRB-approved or research protocols
 - Willful or intentional release of confidential information
 - Use of Connecticut Children's resources or assets for personal gain or private use
 - Falsification of records
 - Disregarding departmental or organizational dress codes
 - Uncooperative attitude such as refusal to answer questions, return phone calls or pages, and impatience to questions

	Connecticut Children's Medical Center - Policy and Procedure Manual		
	Leadership	Date Effective:	April 26, 2011
	Code of Conduct	Date of Origin:	April 01, 1996
	Approved By: Corporate Compliance Committee, Board of Directors	Date Approved:	April 21, 2011

CERTIFICATION FORM

Please read and sign this Certification Form. Once it is completed, remove it from this document and return it to the Corporate Compliance Officer

I have received a copy of the Connecticut Children's Medical Center Code of Conduct.

I have reviewed it carefully and have received answers to any questions I had concerning the Standards as they apply to me.

I agree to comply with this Code of Conduct and with organizational policies and procedures, including but not limited to the requirements for ongoing and continued compliance, reporting of suspected or potential violations, etc.

Signature

Date

Printed Name (Please Print Clearly)

Department Name (Please Print Clearly)

Please fill in all requested information to ensure credit for training