

Baystate  Health

ADVANCING CARE. ENHANCING LIVES.

Code of Conduct

As of February 7, 2023

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Message from the President



Mark A. Keroack, MD, MPH
President and CEO, Baystate Health

Dear Baystate Health Colleagues,

The Baystate Health Compliance Program guides how we conduct ourselves at Baystate Health. It is built on our mission and values and is a part of our daily activities, supporting our tradition of caring – for our patients, our communities, and our colleagues. All of us at Baystate Health are committed to acting with absolute integrity in the way we do our work.

This Code of Conduct offers guidance to ensure our work is done in an ethical and legal manner. It also contains resources to help you resolve questions about appropriate conduct at Baystate Health and to clarify how you should expect to be treated while working here. Please review it thoroughly. Your commitment to its message and meaning is crucial to our success and future.

If you have questions regarding this Code of Conduct, or encounter any situation which you believe violates this Code, you have a responsibility to immediately consult your supervisor, another member of management, your Human Resources Business Partner (HRBP), the Baystate Health Corporate Compliance Office at 413-794-7955, the Baystate Health Hotline at 1-877-874-7444, email complianceoffice@baystatehealth.org or go online to <https://baystatehealth.cqs.symplr.com/Portal/CreateForm/450020>. There will be no retribution for asking questions or raising concerns about possible improper conduct.

In our organization, corporate compliance means more than just following laws, policies, and procedures. It means practicing strong ethical standards in everything we do. These standards form the foundation for our promise of “Advancing Care. Enhancing Lives” for which we all strive. Your commitment will greatly benefit Baystate Health and the community we are privileged to serve.

A handwritten signature in black ink that reads "Mark A. Keroack MD". The signature is written in a cursive, professional style.

Our Principles

Our Mission

The charitable mission of Baystate Health is to improve the health of the people in our communities every day, with quality and compassion.

Our Vision

Our vision, “We enhance your life as a trusted partner in health,” recognizes the importance of understanding and respecting the unique individual who is the object of our care and focus of our relationship.

Our Promise

Our promise is “Advancing Care. Enhancing Lives.” Advancing care reaffirms our commitment to maintain our traditional strengths in clinical excellence in an environment of learning and innovation; Enhancing lives commits us to build new strength in offering exceptional experiences that make a difference in the lives of those we serve.

Our Core Values

We strive to meet our mission and perform all of our work by adhering to our core values: Respect, Integrity, Teamwork, and Lifelong Learning.

Our Corporate Philosophy

Baystate Health’s long-term success depends upon our reputation for the care we give and for our unquestionable ethics in patient care as well as sound business judgment necessary to deliver quality patient care. We recognize the duty of each individual employed by or acting on behalf of Baystate to commit to the highest ethical standards in actions and decisions. We strive to maintain this environment of high ethical standards and compliance by Baystate and each individual during the delivery of patient care, the management of the organization, and the conduct of business. We are dedicated to maintaining an environment where high personal and work standards of all staff, employees, students, researchers, trustees, officers, and directors contribute positively to the corporate culture and to the delivery of excellent patient care.

Our Commitment to Diversity, Equity and Inclusion

At Baystate Health we know that honoring the dignity of every person makes us more than an organization; it makes us a community. We are committed to honoring the dignity of all and to examining our systems and behaviors to ensure they advance equity and shared prosperity, remove barriers and reduce biases in our decisions and actions. We encourage all individuals employed by or acting on behalf of Baystate to uphold the principles of diversity, equity, and inclusion in all that we do. **Diversity** refers to the

similarities among and differences between individuals that account for all aspects of a given individual's personality and identity. **Equity** in the workplace refers to fair treatment with respect to access, opportunity, and advancement for all individuals. **Inclusion** describes the extent to which each person in an organization feels welcomed, respected, supported, and valued as a team member.

Our Expectations

To fulfill our mission successfully and ethically, and to provide excellent patient care, Baystate Health expects all individuals employed by or acting on behalf of Baystate to follow the guidelines and principles in this Code of Conduct, as well as the policies, rules and laws that apply to our employment or responsibilities at Baystate Health. This Code of Conduct summarizes some of these key policies, rules and laws and is intended to guide our conduct. It is not intended to provide a complete statement of all rules and requirements. To find other policies and procedures applicable to your work, please go to the Baystate Health intranet (the HUB) and click on the "Policies" link.

Our Disciplinary Guidelines

Baystate may impose disciplinary actions for violations of the Code of Conduct, failure to report a violation, reporting of a violation in bad faith or for malicious reasons, or discouraging someone from reporting a legitimate concern. Disciplinary actions will be imposed on a fair and equitable basis and consistently applied. Disciplinary action will depend on all of the circumstances and may include:

- Education and training
- Oral or written warnings
- Suspensions or terminations
- Contract termination
- Financial penalties
- Additional monitoring or supervision
- Potential reporting of the conduct to law enforcement

Baystate also reserves the right to immediately discipline, suspend, or terminate an employee who has knowingly and willfully violated the Code of Conduct, applicable laws or regulations, or BH policies. This may include termination of employees or agents who become subject to sanctions or exclusions from government health care programs. In addition, disciplinary action may be imposed for engaging in illegal or unethical off duty conduct that Baystate Health believes in its sole discretion, impairs the employee's ability to effectively fulfill and perform their job duties or reflects negatively on the reputation of Baystate Health within the community. (See Policy *BH-HR-804 Corrective Action*)

Our Patients

Quality of Care and Services

Baystate Health is committed to providing high quality health care to our patients and to delivering health services in an ethical, professional, cost effective, inclusive and nondiscriminatory manner. We are committed to complying with laws and regulations that govern patient quality of care and safety, such as the Medicare Conditions of Participation, the Emergency Medical Treatment and Active Labor Act (EMTALA), Americans with Disabilities Act, Massachusetts Department of Public Health regulations, Joint Commission accreditation requirements and the Affordable Care Act's Nondiscrimination in Health Programs provisions. We are expected to:

- Treat all patients with respect and dignity.
- Only provide care that is necessary and appropriate.
- Provide equal access to care for all patients regardless of race, ethnicity, color, national origin, ancestry, age, gender, gender identity or expression, sexual orientation, disability status, religious or cultural beliefs, marital status, pregnancy, citizenship or immigration status, medical condition, source of payment, or any other classification protected by law.
- Provide free aids and services to people with disabilities to communicate effectively with us, such as qualified sign language interpreters.
- Make reasonable accommodations for our patients with disabilities.
- Maintain complete and thorough records of patient care.
- Recognize the rights of patients to formulate an advance directive and comply with that directive.
- Be properly licensed and credentialed and have the necessary experience and expertise to care for our patients.
- Act in a respectful, collaborative and professional manner.
- Provide a medical screening exam to all patients presenting to a Baystate Health emergency department with a potential emergency medical condition or in labor, to determine if an emergency situation exists. If one does exist, we will provide the patient with medical treatment to stabilize the condition, without regard to the patient's ability to pay.
- Direct patient complaints to Patient Relations.
- Document and report adverse patient safety events in the Safety Reporting System (SRS) located in the Quick Links on the Employee intranet so that we can improve our processes and prevent patient harm.

(See Policies *BC4.610 Patient's Rights and Responsibilities*, *BC4.615 Patient/Family Complaint and Grievance Mechanism*, *BC4.750 Service Animal Policy*)

The Joint Commission

The Joint Commission is a not-for-profit organization that accredits and certifies health care organizations and programs in the United States. They set national standards for quality, safety and performance. Baystate Health is committed to complying with the standards set by The Joint Commission as well as other regulatory agencies. Anyone who has a complaint about the quality of care received at a health care facility accredited by The Joint Commission may contact The Joint Commission at:

Office of Quality and Patient Safety

The Joint Commission

One Renaissance Boulevard

Oakbrook Terrace, IL 60181

Online at www.jointcommission.org/report_a_complaint.aspx

[E-mail: patientsafetyreport@jointcommission.org](mailto:patientsafetyreport@jointcommission.org)

Fax: 630-792-5636

Research, Grants and Other Sponsored Projects (Sponsored Activities)

Baystate conducts research and receives sponsored funding that may lead to further scientific advances in medicine and improvements in health care and health status for all people. When engaged in Sponsored Activities, we are expected to:

- Submit all research, grants and other sponsored projects to Sponsored Programs Administration and to an Institutional Review Board (IRB), as appropriate.
- Conduct all Sponsored Activities according to the highest ethical standards and in compliance with all applicable research policies and federal and state laws and regulations.
- Protect the rights and well-being of our patients who choose to participate in research studies.
- Respect our patients' right to refuse to participate in research and not compromise their access to our services or the care they receive at Baystate.
- Engage human research participants in a meaningful informed consent process.
- Protect the privacy and security of patient information.
- Not commit acts of plagiarism, falsification or fabrication of data, or other research misconduct.
- Provide true, complete, and accurate information on all application documents.
- Be accountable for the funds received from sponsors by tracking time and effort spent on Sponsored Activities.
- Comply with the terms and conditions of all grants and contracts.

(See Policies *BC1.500 Uniform Guidance Procurement* and *BC10.100 Misconduct in Research and Scholarly Activities*).

Our Commitment to Protecting Information

Confidentiality and Privacy

Baystate Health is committed to safeguarding medical and business information. We will:

- Comply with the provisions of the Health Insurance Portability and Accountability Act (HIPAA) and Baystate's privacy and security policies and procedures.
- Keep patient information confidential and only access it if we need the information to do our job. Access for any other reason is prohibited and may result in termination.
- Release patient information only when the release is supported by a legitimate clinical or business purpose, or a patient authorization.
- Refrain from discussing patient information in public areas such as elevators, common areas and dining halls.
- Refrain from sharing any information that would compromise patient privacy on social media sites, blogs, forums, Facebook, Twitter or other Internet sites.
- Protect sensitive business information, which may include salary, personnel and financial information, and strictly limit its dissemination.
- Require our business partners to safeguard our patient information through a written agreement, such as a business associate agreement or data use agreement.
- Protect confidential information and Protected Health Information (PHI) from being viewed, overheard, or accessed by others when working remotely and, if authorized to print PHI from home, store it securely and shred it when no longer needed.

Information Security

Baystate Health is committed to protecting its information and information systems from accidental or unauthorized access, disclosure, modification or destruction. We will:

- Log off workstations and applications when not in use.
- Use usernames, passwords and start up authentication on all devices that store PHI or confidential data, whether the device is owned by Baystate or not.
- Never share passwords.
- Always verify fax numbers before sending patient information.
- Not install, share, or copy software programs, or perform any other acts that would violate a vendor's software license agreement or organizational policies.

- Use all equipment provided to us whether on premise or remote primarily for work purposes and return it when employment ends.
- Use secure mechanisms to text or email patient information when needed and not email PHI to or from personal email accounts.
- Not download or copy work related information or PHI to personal devices.
- Not connect a personally owned or Baystate owned device or laptop to an unsecured network or public WiFi to conduct our work.
- Use a virtual private network (VPN/FortiClient), to log into BH systems to provide a secure connection.
- Ensure that all devices have anti-malware software installed and receive regular updates.
- When remote, ensure that your work device receives regular updates by connecting to the VPN/Forticlient.
- Immediately report lost or stolen devices or other information security issues to the BH Help Desk at 413-794-3000.

(See privacy and information security policies in the Privacy folder and Information Security folder in the “Policies” section of the Baystate Health intranet (the HUB))

Our Business Practices

Our Billing Practices

Baystate Health is committed to complying with state and federal laws related to fraud, waste and abuse.

Anti-Kickback Laws. Federal anti-kickback laws prohibit knowingly offering, paying, soliciting or receiving payment of any kind to induce a business referral. Unless otherwise permitted by law, we will not:

- Offer or accept any monetary payment or benefit in return for a patient referral or the purchase of goods or services.
- Offer gifts or other inducements to patients to influence their choice of provider for health care services.

Federal and State False Claims Acts (FCA). Federal and State False Claims Act violations include:

- Presenting, or causing to be presented, to any government entity, a false or fraudulent claim for payment or approval.
- Knowingly making, using, or causing to be made or used a false record or

statement to get a false or fraudulent claim paid or approved by any government entity.

- Conspiring to defraud any government entity by getting a false or fraudulent claim allowed or paid.

Examples of potential false claims include, but are not limited to:

- Claiming reimbursement for services that have not been rendered.
- Characterizing the service differently than the service actually rendered.
- Falsely indicating that a particular health care professional attended a procedure.
- Billing for services or items that are not medically necessary.
- Submitting claims for services performed by unqualified technicians.
- Forging or altering a prescription or claim.
- Falsely certifying that a patient meets the criteria for services such as home care.

Baystate Health's employees and contractors who prepare, process, and/or review claims should be alert for false claims or billing errors. Baystate Health expects you to report any incident of fraud, waste and abuse whenever you learn of it or suspect it.

Baystate Health expects us to:

- Accurately document the care provided.
- Prepare and submit claims that are complete and accurate, reflect reasonable and medically necessary services, and that are ordered by appropriately licensed medical professionals. These bills must be supported by documentation in the medical record and be compliant with applicable rules, regulations, and standards including Medicare and Medicaid billing rules.
- Understand current coding, billing and reimbursement updates and be trained in the areas of proper documentation, code selection, charge capture and reimbursement issues.
- Notify the appropriate personnel if we discover errors or notice areas for improvement.
- Correct billing errors prior to submitting a bill and promptly refund any overpayments.

The Federal False Claims Act imposes penalties between \$12,537 and \$25,076 per claim¹, and the Massachusetts False Claims Law authorizes civil penalties of up to

¹ Amounts as of May 9, 2022. Amounts are adjusted annually.

<https://www.govinfo.gov/content/pkg/CFR-2018-title28-vol2/xml/CFR-2018-title28-vol2-sec85-5.xml>

<https://www.mass.gov/service-details/attorney-generals-false-claims-division>

\$11,000 per claim. Both laws also provide for the recovery of triple damages sustained by the government.

Protection for Whistleblowers. State and federal laws also contain important protections for whistleblowers. Baystate Health will not discriminate or retaliate against you for reporting, in good faith, a potential or actual fraudulent activity, or for cooperating with any government or law enforcement agency's investigation or prosecution.

Accuracy of Financial Records, Transactions and Reports

Baystate Health's financial records, cost reports, transactions (including patient bills), and resulting financial statements and regulatory reports must be accurate, complete, and in accordance with institutional and regulatory requirements. We are expected to:

- Observe stringent standards in keeping our financial records and transactions. Our records must reflect all components of transactions, as well as our own standard of insisting upon an honest and forthright presentation of the facts.
- Related to the issuance of tax-exempt bonds, we will not directly or indirectly affect securities transactions on the basis of 'insider information.'

Document Retention and Disposition

Every employee is responsible for the integrity and accuracy of our organizations' documents and records, not only to comply with regulatory and legal requirements but also to ensure that documents and records are available to support our business practices and actions. Medical, business, financial and operating documents include *paper and electronic* documents that includes information about Baystate Health or its business activities. We are expected to:

- Comply with the regulatory requirements, accreditation standards and organizational policy for the creation, management, retention, and destruction of records.
- Never falsify or alter information in any employment, business, or patient care record or document. This includes but is not limited to applications for employment, payroll, leave of absence, travel reimbursement and benefits forms, safety incident reports, shipping and receiving reports, and medical or billing records.
- Preserve records related to pending litigation, audits or investigations.

Conflicts of Interest

As a tax-exempt organization, Baystate has a legal obligation to engage in activities and allocate resources to further its charitable purpose. In addition, we are committed to providing patient care that is in the best interest of the patient and not influenced by outside interests. Baystate Health expects and requires us to:

- Act honestly and ethically, and to avoid both actual and potential conflicts of interest with Baystate Health.
- Disclose any actual or potential conflicts of interest to Baystate Health in accordance with policy.
- Act solely in the best interest of Baystate Health, whenever acting as an agent of Baystate Health, in dealings with suppliers, customers or government agencies.
- Conduct all political activities in full compliance with federal, state and local laws and not use Baystate Health resources or funds to campaign for or on behalf of a political interest, campaign or candidate.
- Refrain from soliciting or accepting tips, gratuities, loans or personal gifts of any kind in any value from patients, vendors or from referral sources (physicians, nursing homes, laboratories, etc.). We may participate in business entertainment as long as there is a business purpose for the event and participation does not influence, or be construed as influencing, any business decision.

(See Policies *BCI.300 Conflict of Interest*, *BCI.123 Business Gifts and Business Entertainment*, *BCI.124 Interactions with Drug, Device, Biological, Medical (Industry)*)

Our Workplace

Employment Practices and Workplace Behavior

At Baystate Health, our greatest strength is our employees. Our reputation as an institution of outstanding patient care is built by our employees. We must encourage and support each other as we work toward common goals. Baystate Health is an equal opportunity employer and complies with all laws and regulations governing all aspects of employment, including hiring, promotion and termination. Baystate Health and its employees are committed to maintaining a safe, inclusive, equitable, and respectful environment for patients, staff, and visitors. We do not discriminate against employees or potential employees on the basis of race, ethnicity, color, national origin, ancestry, age, gender, gender identity or expression, sexual orientation, disability status, religious or cultural beliefs, marital status, pregnancy, citizenship or immigration status, medical condition, veteran status, or other classifications protected by law. We do not tolerate violence, threats, intimidation, discrimination, discriminatory bias, or other disruptive, aggressive, abusive or harassing language or behavior, whether by employees, patients, visitors or anyone else on Baystate Health property. We will not accept or acquiesce to any patient request or demand to not be treated by a particular employee or provider that is based on unlawful discriminatory bias. We do not permit retaliation against or

intimidation of anyone who makes a good-faith complaint of discrimination, harassment or retaliation. We are expected to:

- Behave appropriately in the workplace.
- Act in accordance with Baystate Health's values: Respect, Integrity, Teamwork and Lifelong Learning.
- Promote Diversity, Equity and Inclusion.
- Act responsibly and collaboratively and treat everyone with dignity, respect, and in a professional manner.
- Comply with Baystate Health's employment and anti-harassment policies.
- Abide by Baystate Health policies prohibiting illegal possession, distribution, use or being under the influence of illegal drugs, alcohol or other substances.
- Support an alcohol-free, drug-free and smoke-free workplace.
- Not possess, carry or use explosives, firearms, or other weapons on any Baystate Health property, including parking lots and company vehicles, unless required by your job, or threaten others either during or after work time.
- Model the behavior we would like others on our team to demonstrate.
- Help ensure that the rights of patients, visitors and employees are respected.
- Report incidents of inappropriate behavior in the workplace by employees, patients, visitors or anyone else.
- Not destroy, deface, misuse, steal or borrow money, property (including intellectual property), equipment or items belonging to Baystate Health or its employees, vendors, patients, or visitors.
- Complete all required trainings.
- Abide by all Baystate Health policies, including system level, hospital level and department level policies.

(See Policies *BH-HR-810 Harassment in the Workplace*, *BC1.100 Management of Patient Bias*, *BH-HR-809 Equal Employment Opportunity/Affirmative Action*, *BC1.800 Gender Identity and Transgender Employee Policy*, *BH-HR-815 Reasonable Accommodation for Disabled Persons*, *BC 2.100 Workforce Safety, Threat Assessment and Violence Mitigation Policy*)

Health and Workplace Safety

Baystate Health is committed to providing all employees and patients with a clean, safe and healthy work environment. To achieve this goal, we must recognize our shared responsibility to follow all safety rules, policies and practices. We will:

- Wear identification badges visibly above the waist.
- Report any suspicious activity to Baystate Health Security at 413-794-5534, Baystate Noble at 413-636-1446, Baystate Wing at 413-370-5154 or Baystate Franklin at 413-773-2526.

- Follow laws and regulations relating to the environment, including those laws and regulations regarding the handling, storage, use and disposal of hazardous materials and infectious wastes.
- Wear proper protective equipment for our jobs and engage in hand hygiene.
- Adhere to all safety and employee health policies and any state or federal regulations regarding occupational safety.
- Report spills and safety hazards promptly.
- Maintain a neat, safe and orderly work area.
- Properly maintain, use or secure Baystate Health equipment or property.
- Report damage to, or accident involving, Baystate Health equipment or property.
- Follow emergency plans and know what to do in the event of a disaster or fire.

(See Policies *BH-HR-901 Employee Photo Identification, Hazardous Material Safety Program*)

Our Responsibility to Report

Obligation to Report

We are obligated to comply with the expectations in this Code and to report any observed or experienced wrongdoing, including violations of this Code, Baystate Health policies and procedures, or laws and regulations. If you are not sure whether to report a concern or possible issue, consider the following:

- Does the conduct in question conflict with the Baystate Health Code of Conduct, BH values, or BH policies?
- Are you unsure whether an activity complies with the law?
- Does the conduct or action just feel wrong?

If the answer is “yes” to any of these questions, please report the issue or seek further guidance. (See Policy *BC1.400 Duty to Report*)

Drug Theft or Diversion

Any employee who has knowledge of drug theft or diversion by a fellow employee has an obligation to report such information. Baystate shall treat such information as confidential and shall take all reasonable steps to protect the confidentiality of the information and the identity of the employee providing the information. A failure to report information about drug theft or diversion will be considered in determining whether to continue to allow an employee to work in an area with access to drugs. (See Policies *BC4.150 Immediate Response to Suspected Diversion of Controlled Substances* and *HR 824 Fitness for Duty*.)

How to Report

To Report Anonymously (24 hours/day, 365 days/year):

- Call the Compliance Hotline at 877-874-7444
- Complete an online report at <https://baystatehealth.cqs.symplr.com/Portal/CreateForm/450020>

(You can report any issue to the Compliance Hotline. You are not required to reveal your name or department when you report an issue anonymously. Please provide as many details as possible.)

To Report Adverse Patient Safety or Workplace Violence Events (can be anonymous):

- Go to the Safety Reporting System (SRS) located in the Quick Links on the Employee intranet

To Report Compliance, HIPAA/Privacy, Fraud, or Conflict of Interest Concerns:

- Call Corporate Compliance at 413-794-7955
- E-mail Corporate Compliance at complianceoffice@baystatehealth.org

To Report Employee Discrimination, Harassment, HR Concerns:

- Call Employee Relations at 413-794-1748, or your HR Business Partner at 413-794-5655

To Report Research Misconduct:

- Call the Research Compliance Officer at 413-794-3458

To Report Drug Diversion, Loss or Theft, Contact:

- Baystate Medical Center (including D'Amour Center for Cancer Care and clinics): Pharmacy at 413-794-3800 or Security at 413-794-5534
- Baystate Noble: Pharmacy at 413-571-0584 or Security at 413-636-1446
- Baystate Wing: Pharmacy at 413-370-5273 or Security at 413-370-5154
- Baystate Franklin: Pharmacy at 413-773-2228 or Security at 413-773-2526.

Non-Retaliation

Baystate Health does not permit any form of intimidation or retaliation against anyone who reports a suspected violation in good faith or who participates in an investigation. (See Policy *BH-HR-814 Non-Retaliation and Non-Retribution for Reporting Actual or Potential Wrong-Doing*).

Government Inquiries, Investigations and Regulatory Requests

Baystate Health will cooperate fully with all reasonable government inquiries, regulatory and legal requests. If you are in receipt of a warrant, subpoena, request for audit or

investigation, contact your immediate supervisor, Risk Management, Legal and/or Corporate Compliance at 413-794-7955 or complianceoffice@baystatehealth.org for further direction and guidance. (See Policies *BC4.450 Court Orders, Subpoenas, Search Warrants and Other Requests for Medical Records and Protected Health Information; BC4.400 Court Orders, Subpoenas, Summonses, Search Warrants and Requests for Information, Items or Documents; and BC4.500 Unscheduled Regulatory and Accreditation Visits*)

Key Policies in Support of Our Code of Conduct

In addition to the policies specifically referenced in this Code of Conduct, other policies that support the Code of Conduct can be found on the Baystate Health intranet (the HUB). Click on the “Policies” link for all policies intended to guide your conduct and activities. Many of the policies that support our Code of Conduct can be found in the Compliance, Human Resources, Privacy and Security chapters. If you need assistance with policies, or their location, call the Corporate Compliance Office at 413-794-7955.