

# INTRODUCTION

Beth Israel Deaconess Medical Center has an obligation to its patients, community, employees, and payers to conduct its business and deliver its care in accordance with all applicable rules, regulations, and laws. We are committed to helping all our employees, staff physicians, and contractors act in a way that preserves the trust and respect of those whom we serve and with whom we deal.

This Code of Conduct is meant not as an inflexible rulebook, but as a guide to assist us in making decisions and choosing our actions. The code reflects the core values of Beth Israel Deaconess Medical Center:

- Integrity
- Community
- Compassion
- Respect
- Stewardship
- Excellence
- Service

These core values should guide our daily actions. When in doubt about what to do, ask for advice, but also think about these values. If the action you are considering is not compatible, don't do it.

The Beth Israel Deaconess Medical Center Code of Conduct must be followed by all our employees, professional staff, and contractors. No one, regardless of rank or position, may allow personal preference, inconvenience, or business pressures to compromise adherence to these standards, or pressure others to do so.

This code provides general information about how Beth Israel Deaconess will conduct its business. It does not replace the policies, procedures, or practices of the medical center. Furthermore, neither this code nor any written set of rules can replace open and honest discussion or the application of common sense, good judgment, and personal integrity.

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.

Managers, supervisors, and service chiefs often are closest to the situation and can offer the best help to those who have questions about the Code of Conduct. However, if you are uncomfortable talking with them about certain issues, you may always contact the director of the Office of Business Conduct. Inquiries are handled confidentially, and you may remain anonymous if you wish. While the Office of Business Conduct may not be able to solve each issue, it will make every effort to identify the correct source of

information, advise you of the procedure(s) to follow, investigate your concerns when needed, and assist you as appropriate.

Employees, staff, contractors, and others who do business with Beth Israel Deaconess have an obligation, as part of their employment, credentialing, or contract, to notify the medical center through their manager or supervisor, the CEO, or the Office of Business Conduct whenever they suspect behavior that violates the Code of Conduct or any rule, regulation, or law to which we are subject. The medical center is committed to protecting employees, staff, and others who, in good faith, report actions they believe are violations of the code or applicable laws.

Retribution against such reporting also is forbidden by this code and should be reported to the Office of Business Conduct.

Managers, supervisors, and clinician leaders must be open to concerns about compliance. Although uncomfortable questions and concerns may arise, we must welcome the opportunity to address them honestly and swiftly. The Office of Business Conduct, as well as Human Resources, the Safety Office, and Healthcare Quality, all are prepared to assist in the investigation and resolution of any such issues.

## QUALITY

- We shall maintain integrity and quality in our job performance, using work time to the advantage of our patients and always giving our best effort on the job.
- We are responsible for reporting to our supervisor or manager all deficiencies or errors, even if they appear small, so as not to jeopardize the health and safety of our patients and fellow workers. Managers are responsible for investigating such reports and taking action as indicated by the investigation.
- We will provide care always in compliance with all applicable laws, regulations, and standards, keeping patients' safety and rights foremost.
- We uphold sound standards of professional practice; only properly qualified individuals shall provide care at Beth Israel Deaconess.
- We shall maintain all records and documentation needed to provide excellent care, in keeping with all applicable laws, regulations, and standards. Such records shall be legible and completed in accordance with medical center policies.

## **PAYMENTS, DISCOUNTS, AND GIFTS**

- We shall neither accept nor give gifts or other forms of remuneration to induce the referral of patients.
- We shall neither accept nor give gifts or other forms of remuneration in exchange for the purchase, leasing, or ordering of any goods, facilities, or services. Our actions will always conform with the appropriate policies of the Beth Israel Deaconess and CareGroup purchasing departments.
- We shall not accept personal gifts or entertainment whose value exceeds \$100 from any patients, vendors, or others with whom we have a business relationship.
- We shall always act to avoid even the appearance of undue or illegal influence upon us as providers in the care of our patients.
- Physicians and others interacting with them will understand the laws surrounding "the Stark regulations" and anti-kickback laws

## **LEGAL RESPONSIBILITIES**

We shall follow all laws and regulations applicable to our activities. If we are in doubt about the propriety or legality of our actions, we will seek advice from our manager, supervisor, the Office of Business Conduct, or, when appropriate, legal counsel before taking action. We shall pursue and engage in only those business opportunities that are legal and consistent with the Beth Israel Deaconess Medical Center Code of Conduct.

## **BILLING AND CLAIMS**

- Only services that are medically necessary, actually rendered, and appropriately documented shall be billed.
- Coding will accurately reflect the service rendered.
- We shall never knowingly submit a false claim or cause one to be submitted.
- The physician is ultimately accountable for the accuracy of coding. Even if the task of coding is delegated, the physician will provide assistance in the process when requested.

## **RESPONSIBLE USE OF ASSETS**

- We shall protect the property and other assets of Beth Israel Deaconess and the property entrusted to us by patients, families, and others against loss, theft, or abuse.
- We shall dispose of surplus, obsolete, or used equipment or materials responsibly, appropriately, and according to all applicable laws and regulations.

## **TREATMENT AND WORK ENVIRONMENT**

- We shall maintain a safe and healthy environment for our patients and co-workers.
- We shall maintain the security, privacy, and confidentiality of our patients and our employees and staff.
- We shall ensure the safe storage of medications and chemicals throughout the institution. In addition, we shall follow all applicable laws and regulations for the handling and disposal of drugs, medications, and chemicals.
- We shall correctly handle and dispose of all hazardous materials. If uncertain what to do, we shall contact our supervisor, the Safety Office, or another appropriate guide.
- Supervisors will understand the safe handling and disposal of hazardous materials used in the areas under their jurisdiction. They will implement policies and procedures for the safe handling of materials, which will be taught to those who work there.
- If we encounter an unsafe practice, we will report it to the supervisor or the appropriate safety officer.

## **HUMAN RESOURCES**

The source of our success at Beth Israel Deaconess is our employees.

- We support equal employment and other such programs at the medical center.
- We shall encourage our fellow employees to develop their skills and potential.
- We shall take advantage of education and development programs available to further our skills and growth.
- We shall treat one another fairly and respectfully.

- We shall adhere to the medical center's policies prohibiting discrimination on the basis of any characteristic protected by law, and all employment decisions shall reflect this commitment by the medical center.
- We shall strive through words and actions to create an atmosphere of which we are proud and which patients, families, employees, and the public will admire.
- All employees, especially managers and supervisors, shall work to build an environment in which concerns about conduct and behavior can be raised and discussed openly, without fear of retribution or retaliation.
- We are committed to providing health services of the highest quality and standard.
- We recognize diversity in our staff, employees, and patients as a source of strength and an asset to the medical center in providing quality care.
- We recognize the importance of family in our lives and are committed to helping each other resolve any issues that produce conflict between our responsibilities to family and to work. We are committed to solving such problems without compromising our commitment to quality care for our patients.

## **CONFIDENTIALITY**

Any information learned during the performance of one's work at Beth Israel Deaconess that is not commonly available to the public must be kept confidential, to the extent permitted under state and federal law. This rule applies to information about patients, employees, medical staff, research, and business affairs of the medical center, and to spoken, written, and electronic sources.

Each employee is responsible for protecting the privacy of our patients, employees, and staff. Everyone must be careful in their conversations, use of electronic mail, and creating, handling, copying, faxing, and disposing of documents.

We do not allow others to use our individual computer keys, and the key must always remain confidential. All policies and procedures related to authorization of, access to, and release of confidential information must be followed.

## **ACKNOWLEDGMENT**

We thank Tenet Healthcare Corporation for allowing us to use their Standards of Conduct as a model for our Code of Conduct.

## CONFLICTS OF INTEREST

All employees, staff, and contractors with whom we do business recognize the importance of choosing medications, supplies, instrumentation, medical devices, etc. on the basis of effectiveness and benefit to our patients. Furthermore, we recognize the importance of not being unduly influenced or appearing to be influenced in our choices of such items. To this end, we all adhere to a policy of avoiding any conflicts of interest or appearance of conflict in conducting our business.

- In all situations, potential conflicts of interest will be disclosed to a senior official or as described in appropriate policies and procedures.
- Physicians, researchers, and others to whom it is applicable will adhere to the Conflict of Interest and Commitment Policy of Harvard Medical School.

## EMPLOYEE CERTIFICATION AND AGREEMENT

I certify that I have received and read the medical center's Code of Conduct and understand the requirements set forth in that document. I understand that I will be subject to disciplinary action, up to and including termination, for violating medical center policies or failing to report violations of medical center policies.

Name:

Signed:

Date:

***After reading the Code of Conduct, please sign this form and return it to your supervisor.***

## VOLUNTARY REPORTING

All employees and professional staff of the medical center are obligated to report potential or real violations of these codes and rules. Reports can be made:

- Confidentially by phone: (617) 667-1897
- By email: [conduct@caregroup.harvard.edu](mailto:conduct@caregroup.harvard.edu)
- By writing to:

Office of Business Conduct - BR109  
Beth Israel Deaconess Medical Center  
109 Brookline Avenue, Suite 300  
Boston, MA 02215

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- By paging the director of the Office of Business Conduct:  
  
(617) 632-7243, page ID# 38004
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- **By hotline: (888) 753-6533**

***If the medical center determines that a report was knowingly fabricated, distorted, exaggerated, or minimized either to injure someone else or to inappropriately protect the caller, the reporter may be subject to disciplinary action. If an employee or professional staff member does not report conduct known to violate the medical center's policies, that individual may be subject to disciplinary action, up to and including termination of employment or revoking of privileges.***