



**Maimonides**  
Medical Center

**CORPORATE COMPLIANCE  
CODE OF CONDUCT  
Summary**

**Pamela Brier**

President and Chief Executive Officer

**Martin A. Cammer**

Corporate Compliance Officer

**Joyce Leahy**

Vice President for Legal Affairs & General Counsel

*A Message from the President*

Maimonides Medical Center is committed to providing quality medical care in compliance with the law and the highest standards of business ethics. Maintaining an environment of integrity, honesty and respect is an integral part of that commitment and contributes to our continued success as the premier healthcare facility in Brooklyn.

Given the many laws regulating our industry and the complexity of our times, our Board of Trustees has adopted the compliance program to help us live up to our commitment. At the heart of the program is our Code of Conduct. The Code guides us in performing our daily duties by describing the standards of conduct which govern our relationships with patients, affiliated physicians, third-party payors, vendors, subcontractors, independent contractors, consultants and one another. It applies to all employees and colleagues of Maimonides Medical Center, Maimonides Research and Development Foundation and MMC Holding of Brooklyn, Inc. and its subsidiaries.

A compliance program works only if each one of us actively participates. Understanding the ethical and legal standards as you go about your duties is the first step in ensuring your conduct reflects our values and commitment. If you believe a law or company policy has been violated, or find yourself faced with situations in which the right course of action is unclear, speak to your supervisor or call the toll-free Compliance Helpline. By acting quickly and responsibly, you can help Maimonides stay on the right track and maintain its reputation for providing quality healthcare honestly and with integrity.

Pamela Brier  
President and Chief Executive Officer

## **STANDARDS OF CONDUCT**

### ***! Patient Care and Rights***

We provide healthcare that is necessary and appropriate, and treat our patients with respect, dignity and compassion. We make no distinction in the admission, treatment, transfer or discharge of patients based on race, creed, religion, national origin, sex, sexual orientation, citizenship, disability or source of payment. Clinical care is provided based on identified patient needs, not on financial criteria. We involve our patients in all aspects of their care and obtain informed consent for treatment. Patients are advised of their rights including their right to refuse treatment and to create advance directives.

### ***! Emergency Care***

We provide appropriate medical screening and stabilization to patients who come to the Emergency Department, regardless of their ability to pay. We treat and admit anyone with an emergency medical condition based on medical necessity, and do not allow the need to obtain financial or demographic information to delay or impede meeting the patient=s immediate needs. Transfers to other facilities will be made only if the patient=s medical needs cannot be met at Maimonides, appropriate care is available elsewhere and the patient has been stabilized.

***! Patient Privacy and Confidentiality***

Our patients expect their confidentiality and right to privacy to be protected. Releasing patient-specific information to unauthorized individuals or discussing such information in elevators and other public areas is prohibited. Do not share patient-specific information with any Maimonides employee, affiliated physician or colleague other than that necessary for the individual to perform his or her job. Make sure patient information stored in our computer systems is properly safeguarded.

***! Coding and Billing for Services***

Services rendered by our healthcare providers must be based on medical necessity and properly documented by the appropriate individuals. All bills submitted to third-party payors on our behalf must be accurate and complete, reflecting actual services rendered. It is prohibited to present false, fictitious or fraudulent claims for payment or approval.

***! Affiliated Physicians/Fraud and Abuse***

We do not pay or offer to pay anyone for the referral of patients to Maimonides. We will accept patients based solely on the referring provider's independent clinical decision of medical need and our ability to render the needed services. It is also prohibited for any Maimonides employee or colleague to solicit or receive anything of value, either directly or indirectly, in exchange for a referral of patients to any other healthcare provider.

***! Relationships with Vendors***

Our vendors, subcontractors and suppliers are to be selected on objective criteria, including quality, service, price, delivery capability and technical excellence. Personal relationships and friendships play no part in the selection process. Accepting bribes or kickbacks is strictly prohibited.

***! Gifts and Entertainment***

As a general rule, do not accept gifts or favors from individuals or companies with whom Maimonides does business. Token presents or gifts with a total value of \$100.00 or less are permitted, but you may not accept cash or cash equivalents, such as gift certificates, from anyone, including patients and affiliated physicians. Under no circumstances may you solicit a gift. Never accept any gift, no matter how low in value, if it would influence your business judgment.

***! Conflicts of Interest***

A conflict of interest may arise if your outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities, or the demands of your outside activities hinder or distract you from performing your job. It is your responsibility to ensure that you remain free of conflicts of interest, and to disclose any financial interest you or members of your immediate family have in an entity that does business with Maimonides.

***! Books and Records***

Since our books and records reflect our business transactions and serve as a basis for patient treatment decisions, it is essential that they be accurately maintained. Financial information must reflect actual transactions, which must be accurately and properly recorded so as to maintain accountability of company assets. It is prohibited to establish an undisclosed or unrecorded account, to use an account to conceal a company asset, or to falsify, alter or tamper with financial records. Changes to medical records may be made only by authorized individuals, and the destruction or removal of medical records must be in accordance with our policies.

**! *Confidential Information***

Information about our strategies, operations, patients and personnel is confidential and should be protected. Don't disclose confidential information to others outside of Maimonides or your department unless the individuals have a legitimate need to know and have agreed to maintain the confidentiality of the information. Under no circumstances may you use confidential information for your personal benefit, even after you leave your job at Maimonides.

**! *Software and Intellectual Information***

Honor copyrights and software license agreements. Don't copy software or copyrighted documents not authorized for reproduction. Make sure that any software you purchase for your home computer is not copied into work you do for Maimonides or installed into your office computer.

**! *Electronic Media***

All communication systems, including e-mail, Internet access and voice mail, are the property of Maimonides and are to be used for business purposes. You may use our communications systems for personal business on a limited basis, but be aware that these communications are not private. It is prohibited to use the communications channels or Internet access to post, store, transmit, download or distribute material that is threatening, knowingly or intentionally false, obscene, harassing or gives rise to a civil liability or criminal offense. These channels of communication may not be used to send chain letters, personal broadcast messages or copyrighted documents not authorized for reproduction, nor used to conduct a job search or open misaddressed mail.

**! *Sexual Harassment/Discrimination***

Each of us has the right to work in an environment free of harassment. We will not tolerate any form of sexual harassment or discrimination based on our employees' diverse characteristics or cultural backgrounds. Degrading or humiliating jokes, slurs, intimidation and verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates a hostile or offensive environment has no place at Maimonides and is prohibited.

**! *Workplace Violence***

We will not allow any form of workplace violence on our premises. Fighting, stalking, violation of a restraining order, terrorism or hate crimes or threats of violence, whether directed at co-workers, patients or visitors, is strictly prohibited. Anyone who reports to work with guns, knives or other weapon is subject to immediate dismissal.

**! *Prescription Drugs/Controlled Substances***

Prescription drugs and controlled substances must be administered by physician order only and properly documented in the medical record. It is strictly prohibited to divert drugs away from Maimonides or to administer them improperly. If you become aware of a potential lapse in security or the diversion of drugs, report the incident immediately.

**! *Health and Safety***

We recognize our obligation to maintain and promote workplace safety and have developed our policies to protect everyone from potential workplace hazards. If your work involves the use of hazardous substances, follow the rules governing their use, storage and disposal. If you see a situation or condition which you think may be potentially damaging to the environment or poses a safety hazard, advise your supervisor or the Safety Officer so that we can correct the situation and prevent injuries.

**! *Substance and Alcohol Abuse***

To protect the safety and welfare of our patients and colleagues, all employees are expected to be free of the influence of alcohol and illegal drugs when performing their jobs. If you report to work under the influence of an illegal drug or alcohol, have an illegal drug in your system, abuse prescription drugs or possess or sell illegal drugs while on Maimonides property you may be subject to immediate termination.

**! *Personal Use of Company Assets***

Each one of us is responsible for preserving company assets, including time, materials, supplies, equipment and information, and for using company assets for business-related purposes. Occasional use of such items as copying facilities or telephones, where the cost to Maimonides is insignificant, is permitted. Any use of company resources for personal financial gain unrelated to Maimonides business is strictly prohibited.

**! *Marketing and Advertising***

All marketing and advertising materials must be truthful, fully informative and non-deceptive, and accurately describe clinical services and their attendant risks and licensure and certification.

**! *Political Activities***

We encourage our employees to participate in the political process, but such participation must be on your own time and expense. Since Maimonides is prohibited by federal law from contributing funds or resources to political candidates or officeholders or for reimbursing employees for their personal contributions to political campaigns, you may not use company time or resources to support your political activities.

**WHERE TO TURN**

You've made the commitment to do the right thing and uphold our institution's moral, ethical and legal standards. But what do you do if you have information about a possible crime or an ethical violation or other work-related incident, or you encounter a situation in which you are not sure as to the right course of action? Where can you turn?

The compliance program was designed to give you several options to turn to for help. It is a good practice to raise concerns first with your supervisor or your department head. If this approach is uncomfortable or you believe inappropriate, call the Compliance Officer or the 24 hour, toll-free Compliance Helpline at **1-800-585-7970**.

Each of us has an individual responsibility to report any activity that appears to violate applicable laws, regulations or our standards. Violations of legal and ethical standards destroy our reputation and in turn can hurt you and your co-workers. That's why it's critical that you notify a member of management if you are aware of a work-related incident or believe a law or company policy has been violated. There will be no retribution against anyone who makes a good-faith report of a possible violation.

If you believe someone has violated the law or company policy, or is engaging in activities that could damage our reputation, contact any one of the following:

- ! Your supervisor
- ! Your supervisor's manager or department head
- ! The Compliance Officer at 283-3933
- ! The 24-hour, toll-free Compliance Helpline at **1-800-585-7970**

## **COMPLIANCE HELPLINE**

Maimonides has contracted with an outside company to provide a convenient and confidential way for you to report violations of the law or company policy or to seek guidance on a particular ethical issue. We encourage you to discuss your concerns first with your supervisor or another member of management. However, if you are uncomfortable with this approach or prefer to report your concern anonymously, call the toll-free Compliance Helpline at **1-800-585-7970**, available 24 hours a day, 365 days a year.

### ***What Happens When I Call The Compliance Helpline?***

Your call will be answered by a trained Communications Specialist who listens to your concerns. If necessary, the Communications Specialist will ask you follow-up questions to gather further information. At the close of the call, you will be given an individual code number and a follow-up date for you to call back. Calls are never recorded or traced.

### ***Do I Have To Give My Name?***

No. You may give your name if you want, but you are not required to identify yourself. The code number assigned by the Communications Specialist is designed to protect your identity. Some

concerns, though, may be of such a nature that the caller=s identity will become known during the course of the investigation. In such instances we will make every effort to keep the caller=s identity confidential.

### ***What Happens After My Call To The Compliance Helpline?***

After your call, the Communications Specialist will prepare a written report based on the information you provided and forward it to the Compliance Officer. The Compliance Officer will then investigate the matter or assign the report to the appropriate department for review. You will be advised of the status of your concern when you call back on your follow-up date. If additional information is needed in order to fully investigate the matter, the Compliance Specialist will ask you follow-up questions when you call back. No disciplinary or legal action will be taken based only on a call to the Compliance Helpline. Only substantiated findings will result in action.

## **THE COMPLIANCE PROGRAM AT WORK**

You=ve made the call to the Compliance Helpline or reported your concerns to your supervisor or the Compliance Officer. What=s the next step?

### ***! Investigation of Reports***

Each call to the Compliance Helpline results in a written report forwarded to the Compliance Officer. The Compliance Officer will analyze the Compliance Helpline reports and all reports made directly or forwarded to the Compliance Officer. Depending on the nature of the reported concern, the Compliance Officer will personally investigate the matter or assign it to the appropriate department for investigation. All investigations will be conducted as promptly and confidentially as possible. Everyone is expected to cooperate with all investigation efforts.

### ***! Corrective Action***

If an investigation substantiates a reported violation, we will take the steps necessary to correct the problem. Depending on the violation, corrective action may consist of disciplining the offender, paying back an insurer or payor any overpayment amounts incorrectly billed to the payor, or notifying the appropriate governmental agencies of the error or wrongdoing.

Sometimes an investigation or internal audit uncovers a lax or improper practice or procedure which creates the potential for violations. In those cases the Compliance Officer will work with the appropriate departments in proposing recommendations to correct the situation. This can include, for example, instituting new procedures or modifying existing ones, terminating a relationship with a vendor or providing training sessions for the affected department.

### ***! Discipline***

Any employee who has been found to have violated a law or an ethical standard will be appropriately disciplined. All disciplinary actions will be applied consistently and fairly, and will be

determined case by case, based on the facts of each situation. Depending on the violation, disciplinary action may take the form of:

- ! Verbal warnings
- ! Written warnings
- ! Retraining, reassignment or modification of job responsibilities
- ! Suspension without pay
- ! Restitution
- ! Termination
- ! Revocation of medical staff privileges for members of the Medical Staff

! ***Monitoring and Auditing***

Aggressive monitoring is an integral part of the compliance program. As part of our ongoing evaluation process the Compliance Officer will routinely conduct and supervise internal audits of issues that have regulatory or compliance implications. Please contact the Compliance Officer with issues or practices you believe should be surveyed or reviewed to ensure that Maimonides is in compliance with the law.

! ***Background Checks***

As part of the monitoring and auditing process, we will conduct background checks against the federal government's data bases (OIG Cumulative Sanction Report and GSA List of Excluded Parties) for all employees and candidates applying for positions, and employment history, education and references will be confirmed. Healthcare providers applying for positions or medical staff privileges will be subject to a more extensive background check.

**BE A GOOD MAIMONIDES CITIZEN--ACT RESPONSIBLY AND ETHICALLY**

Ask yourself the following questions should guide you in making the right decisions:

- ! Am I uncomfortable with a particular action?
- ! Would I be embarrassed to discuss my action with my family and friends?
- ! Could someone's life, health or safety be endangered by my action?
- ! Could my action appear improper to others?
- ! Have I witnessed an action which I believe violates the law or an ethical standard?

Remember, failure to comply with legal, ethical and moral standards may result in serious consequences, both to you personally, and to Maimonides. Adhering to our standards ensures that Maimonides carries on its mission of providing quality healthcare within the highest moral, ethical and legal standards.

**REPORT SUSPECTED VIOLATIONS  
IF IN DOUBT, SEEK HELP!  
CALL THE COMPLIANCE HELPLINE  
1-800-585-7970  
or  
THE COMPLIANCE OFFICER  
1-718-283-3933**

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