

# Code of Conduct

Integrity at Work

## Table of Contents

From President Richard Fernandez:	
Our Shared Commitment	1
BID Milton's Mission	2
Our R.E.S.P.E.C.T. Standards of Behavior	2
Our People - Including You - Create Our Culture	4
A Culture of Respect and Dignity	5
Confidential Ways to Ask a Question or Report a Concern	5
Topics We All Need to Know	6
• The Patient is at the Center	6
• Keep Information Private	6
• Avoid Conflicts with BID Milton's Interests	9
• "No, Thank You" to Gifts	10
• Responsible Use of Controlled Substances	11
• BID Milton Property and You	12
• Create a Safe Environment	12
• Keep the Right Records	13
• Billing and Coding for a Strong BID Milton	14
• Let's Be Clear About Politics	15
• When the News Media Call	16
• Welcome and Cooperate with Government Agents	16
We All Have Shared Responsibility	17
• Speak Up Without Retaliation	17
• Managers Have Greater Responsibility	18
The Office of Compliance	19
• Evaluating Our Performance	20
• Training and Outreach	20
Quick Guide – How do I: Ask questions, raise concerns or report a violation, learn more, share ideas?	21

## **From President Richard Fernandez: Our Shared Commitment**

Dear Colleague,

Every day, you are trusted to do the right thing for patients and family members, each other and Beth Israel Deaconess Hospital-Milton. Why is this so important? Because our patients' expectations and well-being are at stake, as well as the reputation and continued success of BID Milton.

This Code of Conduct is important reading for employees, physicians, volunteers, students and other members of the BID Milton community. Here you will find guidance for common situations and resources for your questions, whether you work in clinical care or an administrative role. Information about reporting concerns – both directly and anonymously – is also included.

The Code of Conduct is the foundation of our Integrity and Compliance Program at BID Milton. Our roles here at BID Milton are each so different, but we all share a commitment to working with integrity every day.

Please read this Code of Conduct and take it to heart; review it periodically to keep fresh in your mind our principles and the trust that has been placed in you.

Thank you for all you do to make BID Milton an exceptional place to work and receive care.

Sincerely,

Richard Fernandez  
President  
Beth Israel Deaconess Hospital-Milton



Richard Fernandez  
President  
Beth Israel Deaconess  
Hospital-Milton

## **Our R.E.S.P.E.C.T. Standards of Behavior**

Beth Israel Deaconess Hospital-Milton's R.E.S.P.E.C.T standards of behavior help create a positive work environment and an exceptional experience for patients and staff.

**R.E.S.P.E.C.T.** stands for:

### **Responsibility**

Maintain a sense of pride and ownership for your role

### **Empathy**

Demonstrate dignity and compassion in all your interactions

### **Service Excellence**

Provide timely, exceptional care and service in a courteous manner

### **Professionalism**

Conduct yourself as a professional at all times, while protecting privacy and confidentiality

### **Efficiency**

Respect all resources and identify opportunities for continuous improvement and waste reduction

### **Cultural Competency**

Embrace the diversity of patients and co-workers, while respecting our differences

### **Teamwork**

Work together collaboratively, learn from each other, support each other

## **Mission Statement**

Beth Israel Deaconess Hospital-Milton is committed to improving the health of our community by providing exceptional, personalized health care with dignity, compassion and respect.

## **Our People – Including You – Create Our Culture**

We want you to experience firsthand every day how important the people of BID Milton are to creating a culture of integrity. So at BID Milton we do the following:

- Support employees and managers through our Human Resources staff who help ensure a positive and respectful work environment.
- Hire the most qualified person for the job, without discrimination based on race, religion, gender identification, disability or any other legally protected status.
- Develop fair and consistent policies.
- Encourage staff to raise concerns about conduct and behavior, without fear of retaliation.
- Provide a drug-free work place.
- Stand against harassment or other inappropriate behavior.
- Promote employees' professional development.
- Value staff members' viewpoints and seek input and feedback.
- Create an atmosphere that is welcoming to all patients, family members, employees, visitors and members of the community.

## **What We Ask of You**

- Meet the highest standards of your role at BID Milton.
- Maintain any qualifications and other requirements of your profession.
- Work within all laws, rules, policies and standards as you do your work and care for our patients, giving priority to patient safety and patient rights.
- Report to your manager or vice president any errors, near-misses or problems-waiting-to-happen, even if they appear small, so we can protect the health and safety of our patients and fellow workers.
- Treat one another fairly and respectfully.
- Help make BID Milton the best place it can be.

## **A Culture of Respect and Dignity**

A respectful working environment is one that is free from harassment and other inappropriate behavior. BID Milton's culture of respect means we are committed to treating each other and our patients and their family members with dignity and respect. We must speak up about behaviors that create an intimidating, hostile or offensive workplace. This includes offensive remarks, comments, jokes, slurs or harsh words pertaining to race, color, sex, sexual orientation, gender identity, age, religion, creed, national origin, disability, military service or other legally protected status.

Harassment can include offensive pictures, images, communications and emails, sexual remarks, sexual advances, requests for sexual favors and physical conduct, including touching and gestures. Shouting or raising a voice in anger, name-calling or directing profanity or threats at another individual are not allowed. There is simply no place for these behaviors at BID Milton.

## **Confidential Ways to Ask a Question or Report a Concern**

Managers, department administrators, and vice presidents often are closest to a situation and can offer the best guidance if you have questions about the Code of Conduct or activities in your department or unit.

If you are uncomfortable talking with people around you about certain issues, Human Resources and Integrity and Compliance are always available. We handle inquiries as confidentially as possible, depending on the circumstances. You can contact Integrity and Compliance anonymously. (See page 18 for contact information.)

## **WHAT IF...**

A co-worker says something you find offensive and inappropriate. Your co-worker thinks it's funny, but it makes you uncomfortable. What do you do?

## **TAKE ACTION**

BID Milton has a policy against talk like this.

Please immediately notify your manager who will provide guidance and help determine next steps. In addition to your manager, you can call Human Resources at (617) 313-1106 or Integrity and Compliance at (617) 313-1287.

We can advise you or your manager on how to move forward. (See page 18 for all contact information.)

## **LEARN MORE**

Visit the BID Milton Portal, search for Policies & Procedures, and see Human Resources Policy 951-525, 951-526 and 951-529 in the BID Milton Policy Manual.

## Topics We All Need to Know

This Code of Conduct lays out BID Milton's general expectations for integrity and respect. Keep in mind that to work or practice at BID Milton, you must become familiar with the Code of Conduct and follow the rules, regulations and policies that apply to you. On page 18, you'll find a full list of resources with more information about policies and contact information. In this section, we will review several topics that are important to every member of the BID Milton community.

### The Patient is at the Center

Did you know that BID Milton is a leader when it comes to improving patient care quality and safety? We share our progress and what we have learned with others. We promote excellence through innovation and education that is targeted to patient care quality and safety. As part of this work, we each have responsibilities:

- Follow all policies, procedures and guidelines related to the safe delivery of patient care.
- Accurately document the care that we provide for our patients.
- Report patient safety events or near-miss events in the Event Notification Reporting System.
- Call out to your managers and chiefs concerns about patient care.

### Keep Information Private

Patients, family members and our fellow co-workers at BID Milton trust us with their protected health information (PHI) and personal information (PI). You need to protect this information and use only the minimum amount necessary to do your job. Here is what we do:

- Look at and share PHI only when you "need to know" for what we call TPO – treatment, payment (or other financial transactions) or hospital operations.
- Never view PHI or PI out of curiosity or concern.

- Protect medical records, financial data, business strategies and plans about BID Milton activities by logging out of your computer, locking offices, and securing files and records.
- Keep information secure from being lost, stolen or viewed by the wrong people:
  - At your desk or work area;
  - When you file it;
  - When you carry it from one place to another; (Ask yourself if you really need to carry information with you – whether on paper or on a thumb drive. Are you able to securely access the same information from another location?)
  - When you share it – by fax, email or in person; and
  - When you throw it away.
- Be aware when contributing to social media – Facebook, Instagram, Twitter, etc. – in your life outside of work:
  - Never share patient information or other confidential or proprietary information, such as business or research plans.
  - Make it clear your opinions are your own and do not represent BID Milton.
- Keep information secure when using computers:
  - Create strong passwords/ passphrases.
  - Never share your passwords.
  - Never use someone else's password.
  - Always log out or lock the computer when you leave.
  - Use BID Milton-owned laptops and other equipment and confirm with Information Services that they are encrypted. Encryption requires a special software that protects information so that only authorized users can read it.
  - If your job requires you to use your own equipment to access BID- Milton systems, make sure it is encrypted and that all software is up-to-date.
  - Always keep portable equipment with you; never leave a laptop or tablet in your car or a public place.

## WHAT IF...

You realize that you handed the wrong visit summary to a patient who has left the clinic. What do you do?

## TAKE ACTION

Report to your manager and the Compliance and Privacy Officer in the Office of Compliance at (617) 313-1287 when you know protected health information or personal information has been lost, stolen or viewed by someone who should not have access to it. In addition, if computer equipment is lost or stolen, immediately contact the Information Services Help Desk and Security Department. (See page 18 for all contact information.)

## LEARN MORE

Visit the BID Milton Portal and see the HIPAA privacy section in Policies & Procedures.

- Do not click on links or attachments that are not familiar; it may be “phishing,” which means someone is trying to steal your information or break into BID Milton systems.
- Do not download unknown programs, images or files.
- Never back up documents with PHI or PI on publicly available cloud storage. Call the Information Services Help Desk if you have questions or special storage needs.

## **Avoid Conflicts with BID Milton’s Interests**

A conflict of interest occurs if a member of the BID Milton community puts personal, social, financial or political interests ahead of what is best for BID Milton. We must ensure all financial and business relationships are transparent and contribute to the greater good of the hospital. Ensure your actions do not conflict, or appear to conflict, with the right thing to do:

- Make fair decisions at work, never letting your outside activities or personal interests influence or appear to influence your choices.
- Choose medications, instruments, medical devices, other supplies and services based on how well they work for our patients or staff and their value.
- If you are participating in a business decision for BID Milton, let your supervisor know about all financial interests or business relationships that you or members of your family have with the vendor.
- Avoid conflicts of interest by disclosing all financial interests or outside roles that are related to your professional expertise.
- Remember, if you are a Harvard Medical School faculty member, you must also follow the Conflicts of Interest and Commitment Policies of Harvard Medical School.

## **WHAT IF...**

You work as a part-time consultant for your friend’s business on your own time. But now that business is in the running for getting a big BID Milton contract. What do you do?

## **TAKE ACTION**

Contact your manager, chief, administrator or the Office of Compliance at (617) 313-1287. Your manager and Integrity and Compliance will review the information and provide guidance on what to do next.

## **LEARN MORE**

Visit the BID Milton Portal, search for Policies & Procedures and see Administrative Policy 950-514 and 950-424 in the BID Milton Policy Manual.

## **“No, Thank You” to Personal Gifts**

Ensure personal gifts or money never influence – or even appear to influence – patient care or education:

- If a grateful patient or family member asks “How can I thank you,” please encourage them to make a charitable gift to support our work. Call the Philanthropy Office at (617) 313-1194 or visit [www.bidmilton.org/give](http://www.bidmilton.org/give) to learn more.
- You can accept tokens of gratitude from patients or their family members as long as the gift is less than \$50 in value and is not money or a gift card.
- Never ask for, offer or accept anything of value such as money, gifts, entertainment or sports tickets, food or meals, or items such as pens and tote bags:
- To influence patient care;
- To influence others to refer patients to us;
- In exchange for doing business with contractors, vendors, government representatives or anyone in a position to benefit BID Milton; or
- From anyone who provides goods or services to BID Milton or is seeking to do business with BID Milton unless previously approved by the Philanthropy Office and/or Integrity and Compliance.
- Note: There are specific requirements surrounding anti-kickback laws that make it clear how important it is for us to avoid benefitting or appearing to benefit from any kind of influence – either the giving or receiving of gifts, entertainment and more. See Administrative Policy 950-543A in the BID Milton Policy Manual for a full list.

## **LEARN MORE**

Visit the BID Milton Portal, search for Policies & Procedures and see Administrative Policy 950-543A, 950-543B and 950-531.

### **Rules on Giving Goods or Services to Patients**

In general, no BID Milton staff member may provide goods or services of value to patients to influence their decision to seek or receive care at BID Milton. Regulations do allow some exceptions, including some service recovery and small gestures, such as providing a cafeteria voucher after a patient has experienced an unusual waiting time. See Administrative Policy 950-531 for details.

## **Responsible Use of Controlled Substances**

“Controlled Substances” are drugs or chemicals that may be prescribed by a physician or used in research that are regulated by existing federal and state regulations. Drugs in this category may have an increased potential for dependence, abuse, physical or mental harm, or illegal use and sale.

We ask those using controlled substances for clinical care to do the following:

- Become familiar with and follow all laws, regulations and BID Milton policies regarding these substances, including procedures related to ordering, security, record-keeping and disposal.
- Make sure registrations with federal and state agencies are up-to-date and under the proper license every time each substance is used.
- Immediately report theft, suspected theft, unauthorized use or loss of controlled substances to your manager and Security Department.

## **BID Milton Property and You**

Respect what BID Milton owns and use it for the benefit of BID Milton.

Keep personal use to a minimum and never use BID Milton medical or office equipment, computers, phones, copiers or any other item for personal gain or solicitation:

- Protect important equipment from being stolen, damaged or misused.
- Follow established maintenance schedules.
- Immediately inform your manager if BID Milton property is damaged, lost or stolen.

## Create a Safe Environment

A healthy work environment and the well-being and safety of all members of the BID Milton community are central to our R.E.S.P.E.C.T. Standards. These actions help to create a safe environment:

- Follow all laws, regulations and policies related to environmental health and safety, including fire, chemical, biological and radiation safety.
- Handle and dispose of all waste properly, including medical waste and hazardous materials.
- Always work in a safe, responsible way.
- Contact your manager, or the Safety Officer when you encounter an unsafe practice. (See page 18 for contact information.)
- If you have a work-related injury or symptoms of illness, alert your manager and Occupational Health Department. (See page 18 for contact information.)

## Keep the Right Records

Records – paper and electronic – document the hospital's financial, operational, legal, educational and patient care activities. Patients and family members depend on BID Milton to maintain, protect and properly destroy patient records. We take the steps needed to meet state, federal and other regulations – and BID Milton's own high standards:

- Maintain complete and accurate records.
- Follow the records schedule found in BID- Milton's Records Management Policy (Administrative Policy 950-521).
- Preserve original documents that may be needed for legal purposes.
- Discard or destroy records according to BID- Milton policy, making sure information is not lost, stolen or accessible to people who should not have access.
- If you are not sure whether you need to keep a record, always ask your manager or Integrity and Compliance.

### LEARN MORE

Visit the BID Milton Portal, search for Policies & Procedures and see Administrative Policy 950-521 in the BID Milton Policy Manual.

## Billing and Coding for a Strong BID Milton

At BID Milton, we make sure we correctly document and charge for the care and services we provide. We accurately bill insurance companies and government payers, grants and patients. We follow state, federal and payer regulations as well as our own BID Milton policies and procedures. We train coders, billers and any other staff involved in this work so they know the right way to do things. We never knowingly document, charge, code or bill incorrectly. And if we make a mistake, we correct it.

### Documenting Care, Charging, Billing or Coding

- Create documentation that matches the care or service provided.
- Enter the correct codes and bill tests, services and other types of care accurately after services have been documented. Your careful work results in cleaner claims, fewer delays and greater business efficiency.
- Ask your manager for help whenever you have questions to ensure correct codes are charged.
- Never create or change documents in an effort to mislead someone. Don't leave out or falsify any relevant information. All of our work must meet internal review and external audit standards.
- If you are a physician, be accountable for making sure coding and charges are right, even if you delegate the actual coding to a coder.

## Let's be Clear About Politics

We encourage all staff to be active citizens by voting and participating in civic activities for the greater good. BID Milton is also committed to being a responsible corporate citizen. The hospital itself does not support individual candidates or make contributions – that's important to keep our tax-exempt status. But if there are issues that impact health care or our communities, we share our experiences and knowledge with government authorities or candidates.

### Know the Ground Rules for All Staff

- Make it clear that if you make a political contribution or take a position on an issue you are doing it as an individual, not as a representative of BID Milton
- Use personal funds for your political contributions, never BID Milton funds.
- Keep work time and space free from politics and fund-raising.

### WHAT IF...

You see your co-worker using the office copy machine to make flyers for her brother-in-law's city council campaign. It's not that much money; should you say something?

### TAKE ACTION

Mention to your co-worker that BID Milton has a policy about this and suggest she find out more by calling Human Resources at **(617) 313-1106**, or Integrity and Compliance at **(617) 313-1287** for guidance or clarification.

### LEARN MORE

Visit the BID Milton Portal, search for Policies & Procedures and see Administrative Policy 950-541 in the BID Milton Policy Manual.

## When the News Media Call

BID Milton receives frequent requests from the news media and other outside organizations to interview medical staff, employees or patients. Keep in mind the following:

- If a member of the news media asks you for information, please contact BID Milton Public Relations at (617) 313-1590 or page the Public Relations on-call staff person, available at all times through the hospital page operator by dialing 0.
- Public Relations will assure accurate, timely and appropriate release of hospital and patient-related information and coordination between hospital departments and outside parties.
- If you have news to share or a story idea, please contact BID Milton Public Relations.

### LEARN MORE

Visit the BID Milton Portal, search for Policies & Procedures and see [Administrative Policy 950-248](#) in the BID Milton Policy Manual.

## Welcome and Cooperate with Government Agents

BID Milton fully cooperates with government and regulatory agency investigations and inspections. Be prepared when law enforcement officials or regulators arrive:

- Immediately notify your manager, chief and the BID Milton Administrator on Duty. You can reach the Administrator on Duty at any time by dialing 0.
- Inform the agent that the Administrator has been contacted, and will arrive shortly.
- Wait for assistance.

### LEARN MORE

Visit the BID Milton Portal & Procedures and see [Administrative Policy 950-519](#) in the BID Milton Policy Manual.

## **We All Have Shared Responsibility**

BID Milton is able to thrive as an institution because of the contributions of each individual. We each have a role in creating and fostering integrity and respect at BID Milton. Each of us has responsibilities:

- Read and understand this Code of Conduct.
- Know what laws, regulations, standards and policies are relevant to your role.
- Ask your manager, vice president or the Office of Compliance when something is unclear.
- You are required as an employee to speak up about any real or potential violation of any law, rule, regulation, safety standard, BID Milton policy, procedure and the Code of Conduct. Talk with your manager, vice president, Human Resources or Integrity and Compliance. When needed, reach out to federal, state and local agencies.
- Cooperate fully with all internal or external investigations.

## **Managers Have a Greater Responsibility**

Managers, vice presidents and chiefs set the tone for an ethical workplace. We look to you to set a good example and be available to your employees when they have concerns. Being a manager means you have a greater responsibility:

- Read and be familiar with the Code of Conduct and the laws and policies that apply to your team.
- Listen to your staff and promote open conversations about ethical and compliance issues.
- Report concerns to Integrity and Compliance and your department leaders when there is a problem or potential problem.
- Make sure your staff know about the Speak Up Hotline, (888) 753-6533, and other resources available to them for their questions or concerns.
- Make it clear that retaliation is not tolerated in your area, and live that example yourself.

## **Speak Up Without Retaliation**

At BID Milton, we are committed to protecting employees, physicians and anyone who, in good faith, reports actions they believe violate laws, policies or our culture of respect and integrity. Retaliation – treating someone differently or threatening them because they speak up – has no place at BID Milton and is a violation of federal laws and our own policies. So speak up with confidence as a staff member. Managers, senior leaders, Human Resources and Integrity and Compliance are open to your questions and concerns about a wide range of issues – patient care, how we document and charge for our care, how we use resources, how we conduct business, how we treat each other in the workplace and much more. You can contact Integrity and Compliance anonymously by phone or online, if needed. (See page 18 for details.) Integrity and Compliance and Privacy Officer and Human Resources can advise you on next steps or, when necessary, conduct a formal investigation into the issue.



## Integrity and Compliance

Like good medicine, prevention and communication are the foundations of a good Integrity and Compliance Program.

Integrity and Compliance at BID Milton strives to ensure that you have the information you need to do your job according to city, state, federal and agency laws as well as BID Milton's own policies, procedures and guidelines.

Following these laws and policies is not only the right thing to do – it is also a requirement of working, and practicing here. For outside vendors and contractors, it is required for doing business with BID Milton.

Our Integrity and Compliance program supports all BID Milton workforce members, including employees, physicians, volunteers, vendors, contingent workers and contractors. Together, we all strive to meet the highest ethical standards in caring for patients, educating clinicians-in-training, and promoting health. We are committed to you:

- We provide ways for you to ask questions and report concerns, including anonymous options. See page 18 for all the ways to contact us.
- We answer your questions as quickly as possible.
- We investigate violations of law or policy in a timely way and bring in other resources from both within and outside of BID Milton as needed.
- We work to improve the way we do things if staff identify a near-miss or potential compliance violation.
- We work with leaders and staff throughout BID Milton to write and maintain fair, consistent and transparent policies.

We answer directly to the President and the Board of Directors of BID Milton.



Grace Jodhan  
Compliance and Privacy  
Officer

## Evaluating Our Performance

BID Milton is always finding ways to measure the effectiveness of our day-to-day work with the goal of improving what we do. Internal auditing and monitoring help ensure that we are efficient and thorough in our work. More importantly, auditing and monitoring provide BID Milton the capacity to detect, and sometimes prevent, problems that keep us from meeting our own high standards as well as government and other regulations. The Compliance and Privacy Officer welcomes the opportunity to work with hospital staff on a wide range of risk and effectiveness initiatives.

## Training and Outreach

We never want a lack of information to be a barrier to doing the right thing:

- We create trainings regarding laws and policies, best practices in the workplace, business conduct and more. Some are mandatory because we want to ensure every member of the BID Milton community is on the same page when it comes to the basics.
- We recognize that you may have additional required trainings and certifications, depending on the nature of your work and specific role.

Thank you for taking the time to read BID Milton's Code of Conduct. If you have any questions about the Code or feedback to share, please call Integrity and Compliance at (617) 313-1287.

Most of all, thank you for your commitment to working with integrity every day. You bring the mission and values of BID Milton to life and make BID Milton an exceptional place to work and receive care.

## Quick Guide – How do I:

### Ask Questions

- Start with your manager or vice president – they know the most about the laws, regulations and policies that impact your area
- Contact Integrity and Compliance directly:  
(617) 313-1287
- Human Resources: (617) 313-1106

### Raise Concerns or Report a Violation

- Confidential and Anonymous Reporting – Anytime 24 hours a day, 7 days a week:
- Speak Up Hotline:  
(888) 753-6533  
bilh.ethicspoint.com
- Or you may contact Integrity and Compliance directly:  
(617) 313-1287
- Compliance and Privacy Officer: (617) 313-1287
- Human Resources: (617) 313-1106
- Office of the General Counsel: (617) 667-1700
- Safety Officer: (617) 313-1355
- Employee Occupational Health Services:  
(617) 313-1401
- For stolen or lost equipment,  
Information Systems Help Desk: (617) 313-1533
- Security Desk: (617) 313-1370

### Learn More

On the BID Milton Intranet Portal

- BID Milton Policies & Procedures
- Information Security and Privacy (KIP) intranet
- Human Resources
- Integrity and Compliance

### Share Ideas

- Talk to your manager or vice president if you have ideas about improving the way your area or BID Milton meets the standards set out in the Code of Conduct
- Reach out to Integrity and Compliance at  
(617) 313-1287

Beth Israel Lahey Health   
Beth Israel Deaconess Milton

---

**Integrity and Compliance**

199 Reedsdale Road  
(Route 28)  
Milton, MA 02186  
**(617) 313-1287**

**Speak Up Hotline**  
**(888) 753-6533**

**[bilh.ethicspoint.com](http://bilh.ethicspoint.com)**