

1.10 STANDARDS OF CONDUCT

Prepared By: James DeGloria
CHIEF COMPLIANCE OFFICER

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Approved By:

Executive Compliance Committee

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1.10 Standards of Conduct

BACKGROUND

The U.S. Department of Health and Human Services (“DHHS”) Office of Inspector General (“OIG”), and the NYS Office of Medicaid Inspector General, (OMIG), compliance guidance recommends that compliance programs include the development of a written Code of Conduct that includes a clearly delineated commitment to compliance by management employees, affiliated providers, vendors, and contractors operating under the control of the organization.

PURPOSE

We are committed to conducting business ethically and in conformance with all applicable laws and regulations. The purpose of this policy is to provide guidance on the development and dissemination of New York Downtown Hospital’s Code of Conduct.

DEFINITION

The term Code of Conduct refers to the written guidance on standards of conduct and expected behavior of employees and others in the workplace.

POLICY

1. We will maintain and periodically update a written Code to provide guidance on employee and organizational responsibilities related to compliance and address specific issues related to quality of care, reimbursement, financial relationships, and other critical areas with a particular emphasis on preventing fraud and abuse.
2. The Code will address important parts of the compliance program including, but not limited to, employee and management responsibilities, the problem resolution process, employee hotline, and non-retaliation policy.
3. All employees will receive a copy of the Code and participate in

- periodic training sessions that include a review of the Code.
4. The Chief Compliance Officer (“CCO”) will have primary responsibility for developing and periodically updating the Code.

PROCEDURES

1. The Executive Compliance Committee (“ECC”) and the Audit and Compliance Committee of the Board will be responsible for oversight and final approval of the Code.
2. The Code will be written at a basic reading level, avoiding complex or legal language.
3. The Code will address the following critical areas related to compliance:
 - Define those covered by the Code
 - The organization’s mission and values
 - Quality of care/service
 - Compliance with laws and regulations
 - Human resource practices
 - Billing, coding, claims processing, vouchering, etc.
 - Protection and use of information, property and assets
 - Conflicts of interest
 - Health and safety
 - Duty to follow laws and report suspected violations
 - Reporting options/channels available to employees
 - Responsibilities of supervisors and managers
 - Non-retaliation policy
4. The Code will be distributed to all Board members, senior executives, managers, employees, and those with whom business is conducted, as appropriate. Copies will also be provided to all new employees as part of their orientation. Recipients will sign a statement acknowledging (1) receipt, (2) reading and understanding its contents, and (3) agreeing to abide by its provisions.
5. All employees receive training on the Code to help them understand how it applies to everyday work situations. The CCO will ensure that documentation is maintained to evidence those employees who have received training.
6. The CCO will investigate possible violations of the Code and ensure appropriate disciplinary or corrective action is taken when necessary.