

-INTEGRITY-



**CODE OF ETHICS &
BUSINESS CONDUCT**

**Integrity -
Everyone,
Everyday**



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GETTING AROUND THE CODE



Getting around the Code is simple. Click on any section or subsection to jump to that topic. From any page, use the navigation bar at the top of the page to move around or link to additional resources. To search for a word, press “Ctrl+F”.

A MESSAGE FROM ERIC DICKSON

I am proud to be part of the UMass Memorial Health team and proud of the relentless work we do to meet the needs of our patients and our community.

As we continue to grow and transform, it becomes even more important to continue to act with integrity, stay true to our Mission, Vision and Values and our Standards of Respect, and deliver compassionate care.

The Code of Ethics and Business Conduct (the “Code”) is designed as an easy-to-use resource to provide guidance and to use if you have questions about our standards. I encourage you to read it carefully. While this document won’t address every situation you might face, it will help you integrate our Values and Standards of Respect into everyday practice.

Your commitment to uphold the Code is vital to maintaining the public trust and confidence we have all worked so hard to build. If you know of unsafe practices, unethical behavior, or violations of our Code, UMass Memorial policies or any applicable law or regulation, I urge you to speak up. As an organization, we will review and take appropriate actions for reported issues, and under no circumstances will a reporter who has acted in good faith be punished for having come forward.



Remember, we are all caregivers. No matter what your specific role may be, working together we provide outstanding patient care, with Integrity - Everyone, Everyday.

A handwritten signature in black ink that reads "Eric W. Dickson, MD". The signature is fluid and cursive.

Eric Dickson, MD, MHCM, FACEP

President and CEO, UMass Memorial Health

OUR MISSION, VISION AND VALUES



A STATEMENT ABOUT OUR PRESENT AND WHY OUR ORGANIZATION EXISTS

UMass Memorial Health is committed to improving the health of the people of our diverse communities of Central New England through culturally sensitive excellence in clinical care, service, teaching and research.



A STATEMENT ABOUT OUR FUTURE AND WHAT WE WANT TO BE

As one of the nation's most distinguished academic health care systems, UMass Memorial Health will provide leadership and innovation in seamless health care delivery, education and research, all of which are designed to provide exceptional value to our patients.



A GUIDE TO OUR DECISION-MAKING AS WE MOVE TO OUR FUTURE

- C**onsistently excelling at patient-centered care
- A**cting with personal integrity and accountability
- R**especting one another
- E**ffecting change through teamwork and system thinking
- S**upporting our diverse communities



STANDARDS OF RESPECT

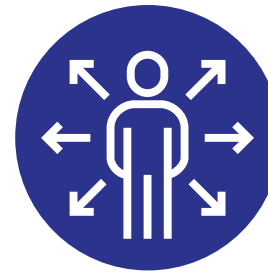
Our Standards of Respect set clear expectations for professional behavior – whether interacting with colleagues or patients. They help us be our best selves by removing barriers to communication and creating a collaborative model that puts the patient first.

These six standards shape how we interact with each other, our patients and the communities we serve:



ACKNOWLEDGE

NOTICE OTHERS AND RECOGNIZE THEIR CONTRIBUTIONS OR CONCERNS



BE RESPONSIVE

RESPOND IN THE EXPECTED TIME FRAME TO SHOW OTHERS' PRIORITIES ARE IMPORTANT TO YOU, TOO



LISTEN

GIVE YOUR FULL ATTENTION TO SHOW YOU UNDERSTAND AND CARE ABOUT WHAT OTHERS SAY



BE A TEAM PLAYER

DO YOUR WORK IN A WAY THAT ALSO HELPS OTHERS



COMMUNICATE

SHARE APPROPRIATE INFORMATION GENEROUSLY AND AS SOON AS POSSIBLE WITH THOSE WHO NEED IT



BE KIND

CHOOSE TO BE FRIENDLY, PATIENT AND COMPASSIONATE - EVEN WHEN IT'S EASIER NOT TO



Meeting our responsibilities

**Integrity -
Everyone,
Everyday**

In This Section:

About our Code

Our responsibilities

Our compliance program

Making good choices

Reporting concerns

Accountability and discipline

ABOUT OUR CODE

“Our Code is a framework for what we stand for and how we conduct ourselves in the workplace.”

- *Community Healthlink Chief Compliance Officer*

Welcome to our Code of Ethics and Business Conduct, (the “Code”).

Whatever role or responsibility you have at UMass Memorial, from time to time you’ve probably faced difficult decisions or had a question about how best to handle a situation. We are fortunate that at times like these, we have resources to turn to for help. We can rely on one another, on our supervisors and on technical experts throughout the organization. But just as important, we also have our Values, Standards of Respect and Code which provide a foundation for our actions.

USING OUR CODE

Our Code is designed to be a reference tool summarizing policies, laws and regulations. If you do not find the information you’re looking for in the Code, follow the links to our policies for additional details or contact the Compliance Office.

WHO MUST FOLLOW THE CODE?

Everyone who works at UMass Memorial must follow our Code and related policies and procedures; this includes members of the Board of Trustees, employees, contractors, volunteers, trainees, members of the medical staff including employed and private physicians, nurses in expanded roles, physician assistants, temporary employees and other persons employed, credentialed or under the control of UMass Memorial, whether or not they are paid by UMass Memorial. In addition, UMass Memorial expects external researchers, vendors, suppliers and consultants to use the Code to guide their interactions with UMass Memorial.



OUR RESPONSIBILITIES

“The Code of Ethics and Business Conduct is a great place to start when you have a question about the right thing to do; it points you in the right direction.” – *UMass Memorial Medical Group Chief Compliance Officer*

LEADERS HAVE ADDITIONAL RESPONSIBILITIES

If you serve in a leadership position, more is expected of you:

- Be the example for others to follow.
- Help workforce members understand the policies, laws and regulations that apply to their work.
- Be approachable. Listen. Maintain an environment where others can comfortably ask questions or raise concerns.
- Provide appropriate and timely responses to questions or concerns.
- Be respectful.
- Whenever possible, effect change through a team-based approach.
- Be consistent when enforcing standards and holding people accountable for their behavior at work.
- If you supervise third parties, make sure that they understand their obligations and our expectations.

No matter our role or responsibilities, we are all moving together toward the same goal: **everyone working to provide great patient care every day.** Doing your part means that you have the following responsibilities:

- Be familiar with our Mission, Vision, Values and Standards of Respect, and rely on them to guide your actions.
- Follow the information contained in this Code, as well as UMass Memorial policies, laws and regulations that apply to you and your job.
- Be sure that you maintain all required licenses and credentials.
- Ask questions and report concerns.
- Work as a team and treat others with respect.
- Cooperate and be truthful when responding to an investigation, inspection or audit.
- Complete all required training.

OUR COMPLIANCE PROGRAM

At UMass Memorial we have created a compliance program to support our commitment to ethical practices and to help maintain a culture of integrity that supports our Mission, Vision and Values.

The goals of the compliance program include:

- **Establishing and communicating policies to ensure compliance with applicable laws and standards.**
- **Providing training about standards of ethics, applicable policies and laws.**
- **Measuring and assessing compliance with legal standards and policies through monitoring and auditing.**
- **Identifying regulatory-related risks.**
- **Implementing procedures to prevent, detect and correct breaches of laws, policies and procedures.**
- **Promoting a culture of integrity.**

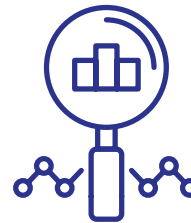


MAKING GOOD CHOICES

Making good decisions is not always easy. At times you will be under pressure or may be unsure of what to do. When faced with a difficult decision, ask yourself:



ARE MY ACTIONS CONSISTENT WITH OUR VALUES, THE STANDARDS OF RESPECT, THIS CODE, OUR POLICIES AND THE LAW?



HAVE I CONSIDERED THE CONSEQUENCES AND RISKS INVOLVED WITH MY DECISION?



WOULD I WANT MY ACTIONS REPORTED IN THE NEWS?



HAVE I CONSIDERED OTHER OPTIONS?



WOULD I BE COMFORTABLE DESCRIBING MY DECISION TO MY FAMILY AND FRIENDS?



IF THE ANSWER TO ANY OF THESE QUESTIONS IS "NO," OR IF YOU'RE NOT SURE, STOP AND ASK FOR HELP.

REPORTING CONCERNS

A culture of integrity and respect is built by each of us every day. It's about doing the right thing - and speaking up when something doesn't feel right. Why speak up? It helps make UMass Memorial the best place to give care, and the best place for our patients to get care. Your voice always matters, and especially whenever you suspect violations of our Values, the Standards of Respect, this Code or the law. When you report concerns, you are protecting our patients, yourself, your coworkers, as well as the reputation of UMass Memorial. **Remember: An issue cannot be addressed unless it is brought to our organization's attention.**

In most cases, your supervisor should be your first point of contact. They are likely in the best position to understand your concern or question and take the appropriate action. If this isn't practical, or your supervisor is unable to answer your question, or if you have already shared a concern and believe it's not being addressed, or if you would rather share information with someone else - you may report your observations to a director, senior leader, Compliance Office, Human Resources representative or EthicsPoint, our third-party ethics and compliance reporting system.



USING ETHICSPPOINT, OUR CONFIDENTIAL REPORTING SYSTEM

EthicsPoint is a resource for you to ask questions, seek guidance and report possible concerns.

- It is independent from UMass Memorial and is staffed by third-party ethics and compliance specialists.
- Translation services are available.
- It is available 24 hours a day, 365 days a year.

When you contact the confidential reporting system by telephone using the toll-free number 844-744-9212, the operator will listen, ask questions if necessary and then write a summary report. The summary will then be provided to UMass Memorial for assessment and further action. You can also make a report by going to umassmemorial.ethicspoint.com or by clicking on the EthicsPoint link in the navigation bar above.

While you can choose to report anonymously, it is important to provide as many details as possible (e.g., who, what, when, where). Since UMass Memorial may need additional information, you will be assigned a report number and asked to call back or log in at a later date to answer any follow-up questions.

INVESTIGATIONS AND CONFIDENTIALITY

Any information provided through our confidential reporting system or through any other reporting channel will be treated confidentially to the extent permitted by law, unless doing so prevents UMass Memorial from fully and effectively investigating and responding to the report. If an investigation is needed, it will be conducted by the applicable UMass Memorial function, and may also involve other UMass Memorial personnel or external resources. We also may be required by law to report certain types of activities to local, state and/or federal authorities.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)



NO RETALIATION

Regardless of the type of alleged or actual wrongdoing reported or the method of reporting, we will not tolerate retaliation against anyone who reports a concern in good faith.

We want everyone to be comfortable sharing concerns and asking questions without worrying about retaliation. We take claims of retaliation seriously; they will be investigated, and if substantiated, retaliators will be disciplined up to and including termination.

If you believe you have been retaliated against, contact any of the resources listed in this Code or linked Q&A/Resources document.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)



ACCOUNTABILITY AND DISCIPLINE

Violations of this Code, our policies, laws or regulations can result in serious consequences for you and for UMass Memorial. We investigate reported violations, and if substantiated, violations may result in disciplinary action up to and including termination of employment.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)





Our responsibilities to our patients

**Integrity -
Everyone,
Everyday**

In This Section:

Quality care

Patient rights

Patient-protected
health information

QUALITY CARE

“Our decisions are based on what’s best for the patient, so working together as a team to follow them through the health care experience makes a big difference in their outcome.”

- Cardiovascular Anesthesiologist

We are proud of our reputation for providing exceptional quality care. To maintain our reputation, each of us must do our part to deliver the right care, to every patient, at the right time, every time.

We believe that all patients are entitled to equal access to care, to be treated with respect, and to the privacy and the confidentiality of their medical and financial records.



INTEGRITY - EVERYONE, EVERYDAY

- Treat our patients and their families with respect and dignity.
- Be responsive to individual health care needs; make reasonable efforts to accommodate individual preferences.
- Involve patients and their families in all aspects of their care.
- Only provide clinical services that are indicated and are within the scope of your education, skill and license or clinical privileges.
- Participate in training, continuing education and patient safety activities aimed at improving quality of care and patient outcomes.
- Ensure that clinical decisions focus on patient needs and that patient admission, discharge and transfers are based on the patient’s clinical needs and not the source of payment.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)



PATIENT RIGHTS

“When we listen to our patients, protect their rights and preserve their dignity, we honor the trust they have placed in us.” - *UMass Memorial Medical Center Nurse*

We encourage patient and family involvement in all aspects of care. We involve patients and families in decisions regarding care to the extent that this is practical and possible. We inform patients about treatment alternatives and the risks associated with the care they are seeking.

We recognize and respect the diverse backgrounds and cultures of our patients and we take efforts to equip our caregivers with the knowledge and resources they need to respect each patient’s cultural needs.



INTEGRITY - EVERYONE, EVERYDAY

- Help patients understand and exercise their rights, including the right to privacy, to be free from discrimination, and to make informed health care decisions, and encourage them to speak openly with their health care team.
- Provide accurate and timely responses to patients’ questions.
- Respect patients’ decisions regarding care, consent for treatment, managing pain or changing or withdrawing treatment.
- Ensure that patients receive care in a safe setting free from all forms of abuse or harassment.
- Promptly report suspicions or evidence of abuse, neglect, harassment, intimidation or exploitation of a patient.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)





PATIENT-PROTECTED HEALTH INFORMATION

“Data helps us provide excellent care, and the power to continuously improve the care we provide. With that power comes responsibility – we can never forget that our data links to real patients whose information must be protected.”

- *System Administrator, Information Services*

Our patients trust us with sensitive and personal information about their health. We routinely collect information about their medical condition, history, medications and family illnesses to provide quality care. We realize the sensitive nature of this information and that we have a responsibility to maintain its confidentiality.

We are committed to protecting our patients’ information by following the Health Insurance Portability and Accountability Act (HIPAA) as well as state confidentiality laws and UMass Memorial privacy and information security policies.

Violating privacy and information security laws and/or our related policies can have serious consequences up to and including termination of employment.

APPROPRIATE USE AND DISCLOSURE OF PROTECTED HEALTH INFORMATION (PHI)

PHI is any information that can be linked to a specific individual about their health status, provision of health care or payment for health care. We only use or disclose patient information when we have a legitimate reason to do so, including:

- Treatment – Providing care to the patient
- Payment – Providing PHI as requested by a patient’s insurance to receive reimbursement
- Operations – Reviewing PHI while conducting internal reviews or audits

Inappropriate reasons include:

- Mere curiosity
- Checking the lab results of a friend
- Responding to requests from unauthorized friends or family
- Responding to requests for information from the news media or postings on social media
- Responding to requests from third-party non-providers without written authorization from the patient



INTEGRITY - EVERYONE, EVERYDAY

- Protect our patients' confidential information against unauthorized access, use and disclosure.
- Always lock a computer when not in use, and never leave patient information unattended.
- Do not discuss patient information with anyone who does not have a legitimate need to know based on their job.
- While we care about our colleagues at work, do not share information about services they receive as a patient except to those involved in their care or who have a need to know based on their job.
- Avoid discussing confidential information in places where others might overhear what is being said, such as on elevators, visitor or common areas or when using a phone in non-private areas.
- When working from home or at another remote site, be sure to follow the same standards to ensure patient privacy.



CYBERSECURITY

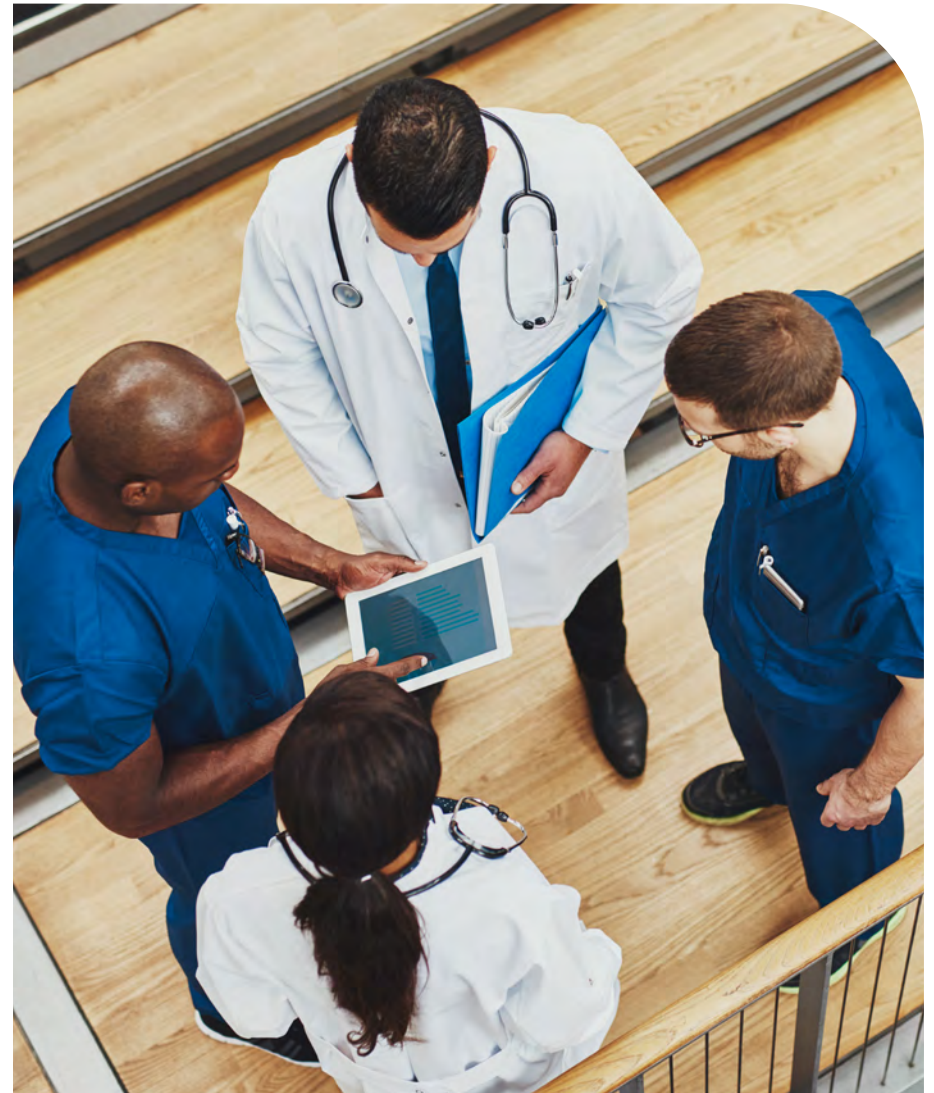
We are dependent on information systems and the information they contain. Each of us must do our part to protect our data and information systems from accidental and intentional breaches:

- Make sure you follow our policies and procedures that are designed to protect our networks, computers, programs and data from attack, damage or unauthorized access.
- Never share your password or use the password of another workforce member at any time.
- Be alert to phishing scams or other attempts to uncover sensitive patient, caregiver or corporate information.
- Don't open suspicious links in emails, even if you think you know the source.
- Any mobile device, laptop computer or telephone with patient or other sensitive information must be secured or in your control at all times. The loss of any device that contains this information must be reported immediately to privacyandsecurity@umassmemorial.org or to the EthicsPoint confidential reporting system.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)





Our responsibilities to one another

**Integrity -
Everyone,
Everyday**

In This Section:

Diversity, equity, inclusion
and belonging

Harassment

Health and safety

DIVERSITY, EQUITY, INCLUSION AND BELONGING

“When we strive to understand and bridge our differences, we learn to work better as a team.”

- Medical Interpreter

We work best when we work together as a team, when we treat each other with respect, and value the unique contributions of others. Each of us must do our part to help create a positive work environment where everyone can contribute and fully utilize their talents.

We are committed to equal employment opportunity and prohibit discrimination based on race, color, religion, gender, age, sexual orientation, gender identity, national origin, veteran status, disability or any other category protected by law.

A CULTURE OF DIVERSITY, EQUITY, INCLUSION AND BELONGING

Our patients benefit from the rich variety of ideas, skills and perspectives that result when we work together. Our collaboration fuels innovation, better solutions to complex problems and a stronger sense of community. Creating a culture of diversity, equity, inclusion and belonging enables us to do more than any one of us could possibly accomplish on our own.

We comply with state and federal laws that prohibit discrimination and retaliation against individuals with disabilities. We encourage volunteers, job applicants and caregivers to inform their managers or Employee Health Services of any disabilities that interfere with their ability to work so that reasonable accommodations may be considered.

INTEGRITY - EVERYONE, EVERYDAY

- **Treat others with respect – colleagues, patients and everyone we interact with at work.**
- **Keep an open mind to new ideas and listen to better understand and learn from different points of view.**
- **Always remember that offensive messages, comments and inappropriate jokes are inconsistent with our team culture and are never acceptable.**
- **If you supervise others, base your employment decisions on merit and be aware of potential biases. Consult with the Human Resources Department or the Office for Diversity, Equity, Inclusion and Belonging if you have questions or need support.**



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)



HARASSMENT

We believe that everyone has the right to work in an environment that is free from harassment and is characterized by respectful and appropriate behavior. We do not tolerate disrespectful behavior or harassment by or directed at any caregiver, patient, patient family member, volunteer or visitor at our facilities.

HARASSMENT CAN TAKE MANY FORMS

Harassment can be verbal, physical or visual and can include jokes, unwelcome touching, rude gestures, offensive emails or social media posts. It does not have to be sexual in nature to still be inappropriate and against our standards of conduct.

At UMass Memorial, we consider harassment to be a serious act of misconduct that may result in termination of employment.

INTEGRITY - EVERYONE, EVERYDAY

- Be professional and respectful in your interactions with others.
- Speak up and report all forms of harassment, inappropriate conduct and bullying.
- Never tolerate degrading jokes, slurs, bigotry, physical or verbal intimidation, unwelcome sexual advances or other disrespectful conduct.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)



HEALTH AND SAFETY

“My purpose is to keep people safe. If I know that everyone is safe then I know I’m doing my job.”

- UMass Memorial Medical Center Police Officer

We are committed to providing a healthy and safe workplace for our caregivers, patients, their families and others who visit our facilities. Look out for one another and speak up whenever you are concerned or uncertain about potential hazards in your work area.

Make sure you understand and comply with our policies and applicable regulatory standards relating to health and safety including occupational safety, the environment, proper storage and disposal of medical waste and other hazardous materials.

INTEGRITY - EVERYONE, EVERYDAY

- Follow safety and security procedures and take immediate action whenever you see an unsafe situation.
- Wear your ID badge and be alert to those who try to tailgate into secure areas without showing their ID.
- Help contractors and third parties to act consistently with our policies, procedures and safety requirements.
- While at work you must never be impaired by either alcohol or prescribed or illegal drugs.
- Never tolerate workplace violence, including behavior that is threatening to either physical or psychological safety, overly aggressive, confrontational or violent. Workplace violence should be reported immediately to your public safety office or local police.



SAFETY IS ALWAYS A PRIORITY

Never cut corners. Help make sure that those who work with you – colleagues, volunteers and contractors – act consistently with our safety standards. Watch for and report safety hazards to the appropriate department. These may include:

- Medical waste
- Hazardous chemicals
- Slip and fall hazards
- Damaged or unmaintained equipment
- Electrical hazards
- Unauthorized weapons on our premises



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)





Our responsibilities to our partners and the public

**Integrity -
Everyone,
Everyday**

In This Section:

Confidential business information

UMass Memorial Health resources

Marketing and communications

CONFIDENTIAL BUSINESS INFORMATION

“We all have a responsibility to be honest and transparent about our operations and performance, to use our property appropriately and to protect confidential information.”

- Internal Auditor

In the course of doing our work, we may have access to confidential information related to UMass Memorial strategic or business operations. We must keep such information confidential and protect it from loss, misuse or inappropriate disclosure.



CONFIDENTIAL BUSINESS INFORMATION

Confidential business information is information that is proprietary, not publicly known, or is subject to restrictions on how it can be shared. Confidential business information includes:

- Intellectual property, including inventions, patents and copyrights
- Data developed or purchased by UMass Memorial or entrusted to us by third parties
- Marketing data, business and/or strategic plans
- Passwords and other log-in information
- Pricing and cost information
- Vendor names, vendor lists and vendor agreement terms

INTEGRITY - EVERYONE, EVERYDAY

- Use and disclose confidential business information only for legitimate business purposes, and only when appropriately authorized.
- Keep confidential assets secure to prevent disclosure and do not share research or other intellectual property without proper authorization.
- If you receive a request for information that's confidential, ensure that it is appropriate to share the information.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)



INSIDER TRADING

Through your work, you may become aware of material, nonpublic information about publicly traded companies, including our suppliers and business partners. Using this information for personal gain, sharing it with others or spreading false rumors is not only unfair to other investors, in some instances it may be illegal. Before you use or share this information, discuss the matter with the Office of the General Counsel.

From time to time UMass Memorial engages in tax-exempt financing which results in issuing bonds. These bonds are considered publicly traded securities and, as such, are also regulated by federal securities laws. For the following individuals and their families there is an absolute prohibition on the trading of any UMass Memorial bonds: All members of Boards of Trustees and board committees, officers, vice presidents, directors and department heads, department chairs, chiefs and physician leaders, and all persons whose job responsibility is to select or assist in the selection of a provider of goods or services.

UMASS MEMORIAL HEALTH RESOURCES

“I’m constantly looking for ways to improve the patient experience. The challenges are not always the big things, the difficult piece is eliminating the small things that create waste and inefficiency.” – **Associate Chief Nursing Officer**

As a non-profit health care organization, the public has entrusted us to protect, maintain and use UMass Memorial’s resources to carry out our Mission. All of us have a responsibility to make sure that UMass Memorial’s resources are used and disposed of appropriately.

OUR RESOURCES

UMass Memorial’s resources include employee time, supplies, equipment, information, software and data, records, business information, strategic plans, business and financial plans, as well as intellectual property including trademarks such as the UMass Memorial name and logo.

INTEGRITY - EVERYONE, EVERYDAY

- Use UMass Memorial property and equipment only for legitimate business purposes. Our resources may not be used for community or non-UMass Memorial charitable use without approval from senior leadership.
- Always follow proper procedures for disposal of used equipment and property.
- Obtain prior approval from your manager before providing service to the community during working hours.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)



MARKETING AND COMMUNICATIONS

To best serve our patients and the public, it is important that we keep them informed about UMass Memorial, our services and initiatives that impact the community.

All contact with news media, whether because of an external request or a UMass Memorial effort, must be channeled through the Marketing and Communications Department.



INTEGRITY - EVERYONE, EVERYDAY

- Make sure communications with the public are accurate and are never deceptive or misleading.
- Present only truthful, informative and non-deceptive information in our materials and announcements.
- In public communications, never disparage others and always keep our communications respectful and consistent with our Values.
- Never include protected health information or other sensitive personal information in UMass Memorial communications without required authorizations.
- Never speak on behalf of UMass Memorial unless you are expressly authorized to do so.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)





Our responsibilities as a health care organization

**Integrity -
Everyone,
Everyday**

In This Section:

Health care laws and regulations

Relationships with physicians and other third parties

Conflicts of interest

Gifts and entertainment

Accurate records

Antitrust compliance

HEALTH CARE LAWS AND REGULATIONS

“Health care is different from most other service industries; in addition to the patient and the provider, payors – including the government – are key partners in the care we provide.”

- Hospital Chief Compliance Officer

We operate in a highly regulated industry with federal and state standards that are extensive and complex. As workforce members of UMass Memorial, we are expected to know the rules that apply to our jobs and comply with applicable regulatory standards.

Legal and regulatory compliance can be complicated, especially when insurance claims and government programs like Medicare are involved. If you have questions or suspect a possible violation, contact your supervisor or the Compliance Office.



KEY DEFINITIONS

Fraud is intentional deception or misrepresentation made with the knowledge that the deception could result in some unauthorized benefit. Examples of fraud include billing for services never rendered or altering a diagnosis to receive payment.

Waste is related primarily to mismanagement, inappropriate actions and inadequate oversight leading to the misuse of resources. Waste includes ordering excessive diagnostic tests (e.g., pregnancy tests on all patients regardless of age, or daily complete blood counts on all inpatients) or prescribing 90 days of medication when only seven days is needed.

Abuse relates to practices that are inconsistent with sound fiscal, business or medical practices and which result in unnecessary costs. Abuse examples include charging excessively for services or supplies or providing treatment to a patient that is inconsistent with their diagnosis.

INTEGRITY - EVERYONE, EVERYDAY

- Comply with federal and state health care program requirements including requirements pertaining to privacy, referrals, conflicts of interest, gifts and entertainment, research, billing and coding.
- Accurately document services provided to patients in the medical record.
- Only bill for medically necessary services actually provided and assign codes that accurately reflect the patient care provided and documented in the medical record.
- Respond promptly to patient complaints or questions regarding a bill.
- Monitor and audit UMass Memorial billing practices and correct billing errors prior to submitting a bill. If the bill has already been submitted, correct the underlying problems and make appropriate refunds.
- Never engage in unlawful or inappropriate practices that could result in a false claim being made. This may include misrepresenting a diagnosis to obtain payment or unbundling charges to enhance payment.

INELIGIBLE PERSONS

We do not contract with, employ or bill for services if the services are provided by an individual or organization that is excluded or ineligible to participate in state or federal health care programs; is suspended or debarred from federal government contracts; or has not been reinstated in a federal health care program after a period of exclusion, suspension, debarment or ineligibility.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)





RELATIONSHIPS WITH PHYSICIANS AND OTHER THIRD PARTIES

Physicians and other health care providers are often in a position to refer patients to our facilities. Federal and state laws have specific requirements that we must follow to ensure referrals are proper, based on the needs of the patient and are not in return for gifts or special favors. We prohibit paying for referrals or accepting anything of value in exchange for the referrals of patients.

Any arrangement with a physician or organization associated with physicians must be in writing, with rates at fair-market value, meet a legitimate business need and must be approved by the Office of the General Counsel.

Because of the complicated and sensitive nature of joint venture arrangements, all such arrangements must be approved by the Office of the General Counsel.

INTEGRITY - EVERYONE, EVERYDAY

- Accept referrals based only on:
 - A patient’s clinical needs, and
 - Our capability to provide needed services.
- Never offer to pay anyone, including coworkers, physicians or any other health care provider to refer a patient.
- If you are offered any kind of payment for a patient referral, always turn it down and report it to the Compliance Office.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)



CONFLICTS OF INTEREST

In our personal and professional lives, we all have multiple roles, commitments and interests, but when acting in our role at UMass Memorial it is important to carefully manage situations where our personal interests could conflict or reasonably appear to conflict with the best interests of UMass Memorial or our patients.

All workforce members involved with purchasing or contractual arrangements with external parties must ensure that potential conflicts are disclosed in advance to their managers and, as necessary, with the Compliance Office.

A conflict of interest can occur when outside interests interfere with our ability to perform our duties objectively on behalf of UMass Memorial.

MANAGING CONFLICTS

Conflicts do not always have to be eliminated but they must always be managed to protect the interests of our patients and the reputation of UMass Memorial. In many instances, conflicts can be avoided or managed if certain steps are followed. Be proactive and, whenever possible, avoid situations that can lead to even the appearance of a conflict. If you find yourself in a potential conflict of interest, talk with your manager or the Compliance Office. Depending on the circumstances, some conflicts may be resolved if they are proactively disclosed and handled properly.



INTEGRITY - EVERYONE, EVERYDAY

Being able to recognize a potential conflict can help you avoid one. While it isn't possible to list every situation that could present a conflict, the following guidance can help you avoid the most common types of conflicts.

- Avoid outside financial interests that might influence your decisions or actions, such as:
 - A personal or family interest in an organization that has a business relationship with UMass Memorial, or
 - An investment in another organization that competes with UMass Memorial.
- Seek approval before joining the board of directors for another organization or participating on a government committee or commission.
- Inform your manager or supervisor before beginning any outside employment and be sure to never allow an outside job to interfere with your duties at UMass Memorial.
- If you have a financial, governance or family relationship with an existing or potential vendor, report the relationship to your supervisor or the Compliance Office.
- Do not use your position, or knowledge gained because of your position, for personal benefit to the detriment of UMass Memorial.

HIRING FORMER AND CURRENT GOVERNMENT EMPLOYEES

There are restrictions for the recruitment and employment of former or current public (state or federal) employees. For example, prior to accepting a UMass Memorial position, certain government employees must notify their government employer of the UMass Memorial offer. Managers making offers to current or former government employees should consult with the Office of the General Counsel regarding such recruitment and hiring.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)



GIFTS AND ENTERTAINMENT

Offering or accepting personal gifts or entertainment may influence our decisions or the decisions of others and may constitute a conflict of interest, and in some instances may violate federal or state laws. The appropriateness of offering or accepting gifts and entertainment depends on the specific circumstances and who is offering and receiving it. When exchanging gifts and entertainment, the following guidelines must be followed.



INTEGRITY - EVERYONE, EVERYDAY

GIFTS OR THE PROVISION OF ITEMS OF VALUE TO OR FROM PATIENTS

- Gifts from patients or their families
 - UMass Memorial prohibits the receipt of gifts from patients to individual caregivers, with the exception of consumable or perishable gifts that can be shared with coworkers (e.g., flowers or a box of candy).
 - All other gifts received must be refused or returned. Please contact your Compliance Office for assistance as needed.
 - Grateful patients who wish to acknowledge UMass Memorial and our caregivers should be directed to the UMass Memorial Office of Philanthropy.
- Gifts or the provision of items of value to patients or their families
 - In general, UMass Memorial may not provide gifts or free or discounted items and services to patients unless specifically permitted by UMass Memorial policies, such as those that address financial assistance, waiving patient financial obligations, patient transportation and programs intended to improve patient access to care.

GIFTS OR THE PROVISION OF ITEMS OF VALUE TO OR FROM VENDORS OR HEALTH CARE PROFESSIONALS AND ENTITIES

- Gifts or items of value from vendors or health care professionals and entities
 - UMass Memorial generally prohibits the receipt of gifts or items of value from vendors or health care professionals and entities, such as meals or entertainment, unless specifically permitted by UMass Memorial policies, such as those that address vendor relationships and financial relationships with practitioners and other referral sources.
 - Vendors or other health care professionals and entities who wish to support our programs or acknowledge UMass Memorial and our caregivers should be directed to the UMass Memorial Office of Philanthropy.
 - Unless they are directed to and accepted by the Office of Philanthropy, or otherwise approved by the Compliance Office, gifts received from vendors or health care professionals and entities must be refused or returned, with a request to not offer such items in the future. Please contact your Compliance Office for assistance as needed.



- Gifts or items of value to vendors or health care professionals and entities
 - In general, UMass Memorial will not provide gifts or items of value to vendors or health care professionals or entities unless UMass Memorial would be permitted to accept the same gifts or items of value from the vendor or health care professionals and entities.
 - UMass Memorial does not offer to pay, solicit or accept money, gifts or services or any other form of remuneration in return for the referral of patients.

GIFTS AND ENTERTAINMENT – GOVERNMENT REPRESENTATIVES

Gifts, meals, entertainment or other items should not be given to state officials or employees in excess of \$50 or federal officials and employees in excess of \$20 for reasons related to their official position. Items valued at these limits and below provided to government officials and employees must be reported to the UMass Memorial Office of Government and Community Relations.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)



ACCURATE RECORDS

UMass Memorial records, documents and reports must be accurate, complete and in compliance with applicable laws and UMass Memorial policies. This includes financial transactions, financial reports, personnel records, insurance claims and medical records.

Documents should only be destroyed in accordance with our records retention policy.



INTEGRITY - EVERYONE, EVERYDAY

- Each of us is responsible for information and records under our control and we must be familiar with the recordkeeping procedures that apply to our jobs.
- Report suspected improprieties in accounting, billing and coding, patient records, financial reporting or other recordkeeping matters to the Compliance Office.
- If you supervise subcontractors providing billing or coding services, be sure that they have the necessary skills, quality assurance processes, systems and appropriate procedures in place.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)



ANTITRUST COMPLIANCE

Competition or antitrust laws are intended to ensure that competition is open and fair and in the best interest of the public. These laws are complex and compliance requirements can vary depending on the circumstance.

ANTITRUST “RED FLAGS”

The following activities are examples of “red flags” and should be avoided and reported to the Office of the General Counsel:

- Agreements with competitors to fix fees and prices or attempts to rig a bidding process
- Agreements with competitors to allocate patients, job applicants and employees, or other markets
- Discussions with competitors about pricing, bids, markets, patients, employees and related matters
- Exchanging competitively sensitive information with competitors
- Imposing restrictions on vendors, employees or suppliers

If you have any questions, you should discuss the matter in advance with the Office of the General Counsel.

INTEGRITY - EVERYONE, EVERYDAY

- Understand how antitrust laws apply to your work, and if you are unsure, talk to the Office of the General Counsel before taking any action that could possibly be a violation.
- Gather information about competitors fairly and never use improper methods such as spying or hacking.
- Never encourage or pressure third parties or former employees of competitors to provide us with confidential information.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)





Our responsibilities to the communities we serve

Integrity - Everyone, Everyday

In This Section:

Charitable and political activities

Speaking on behalf of
UMass Memorial Health

Academic and research
standards

Dignity and human rights

Environmental sustainability

CHARITABLE AND POLITICAL ACTIVITIES

“About 20% of a person’s lifelong well-being is determined by the quality of their health care while 60% is determined by local ZIP code, social and economic factors, such as education level, employment, housing and access to fresh food. As a result, we need to look more deeply outside our walls and invest in our community in order to positively influence these factors.”

- President, UMass Memorial Community Hospitals and Chief Administrative Officer

UMass Memorial’s Community Benefits program and Anchor Mission aim to improve the health and welfare of our community beyond our hospitals’ walls, particularly in those areas suffering pervasive inequality and social disadvantage.

Our Anchor Mission includes four pillars to support our communities: investing, hiring, purchasing and volunteering. We offer our workforce members volunteer opportunities where they can get involved and contribute to the Mission of our organization outside of their traditional roles, and support workforce members who participate in charitable and community engagement initiatives.

We believe in the rights of our workforce members to participate in the political process, but as a tax-exempt organization, UMass Memorial is prohibited from engaging in any activity that is intended to support or oppose any candidate for public office or political party. You may support or oppose candidates for political office, but may only do so as an individual citizen on your own time and at your own expense.

UMass Memorial may engage in policy advocacy, both within and outside of UMass Memorial, to support or oppose the passage, amendment or revocation of legislation or administrative law either by federal, state or local officials or by ballot question. Workforce members who engage in policy advocacy – whether on or off UMass Memorial premises and during working time or not – shall not in any manner suggest, directly or indirectly, that their views, opinions or positions are on behalf of, endorsed or shared by UMass Memorial, absent express authorization to do so by the UMass Memorial Office of Government and Community Relations.



INTEGRITY - EVERYONE, EVERYDAY

- When publicly discussing politics, make it clear that your views and actions are your own and not those of UMass Memorial, unless authorized by the Office of Government and Community Relations.
- Never pressure others to contribute to, support or oppose any charitable cause, political candidate or party.
- Do not use UMass Memorial resources or facilities to promote any political candidate or party.

CHARITABLE DONATIONS/FUNDRAISING

The Office of Philanthropy is responsible for raising funds for purposes established by senior leadership and the Board of Trustees. The Office of Philanthropy may solicit corporations, endowments, trusts, not-for-profits and other health care providers and patients. Workforce members may be asked, but should never be pressured, to give gifts or participate in fundraising.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)





SPEAKING ON BEHALF OF UMASS MEMORIAL HEALTH

We need a clear and consistent voice when providing information to the public and the media. For this reason, it is important that only formally designated workforce members speak publicly on behalf of UMass Memorial.

INTEGRITY - EVERYONE, EVERYDAY

- Unless you are authorized to do so, never give the impression that you are speaking on behalf of UMass Memorial in any communication that may become public.
- Obtain approval from Marketing and Communications before making public speeches, writing articles for professional journals or engaging in other public communications on behalf of UMass Memorial.



SOCIAL MEDIA

Keep your online communications professional and positive; assume the whole world can read them.

- Think carefully before you hit the “send” button in an email, text or social media post.
- Be careful when listing UMass Memorial as your employer with the understanding that your social media activity may have an impact on UMass Memorial.
- Never disclose confidential information about UMass Memorial, coworkers, our patients or our business partners.
- If you read media reports about UMass Memorial that you believe are inaccurate, do not respond but instead contact Marketing and Communications.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)



ACADEMIC AND RESEARCH STANDARDS

“We educate physicians and advanced practice providers to heal, discover and above all to care with compassion.” - ***Vice Chair for Education, Department of Medicine***

UMass Medical School is primarily responsible for the oversight of academic research conducted at UMass Memorial, including the legal and ethical standards applicable to medical education and research, federal and state requirements relating to scientific misconduct, the protection of human subjects in research and the use of animals in research. UMass Memorial supports UMass Medical School in these efforts.

Research data must be accurate and complete. All patients asked to participate in a research protocol or project will be given a full explanation of alternative services that might prove beneficial to them. Patients will also be fully informed of the risks, expected benefits and alternatives, as well as the procedures to be followed, especially those that are experimental in nature.

Follow privacy policies as they relate to the use of patient information in research, and follow billing guidelines for clinical services that are provided as part of a research protocol.





INTEGRITY - EVERYONE, EVERYDAY

- Ensure compliance with federal and state laws and regulations in any research, investigations and/or clinical trials conducted by our physicians and professional staff.
- Monitor the research being performed to ensure good clinical practices are being followed.
- Report any situation that may put subjects at risk.
- Only use UMass Memorial patient information for research when such use is permitted by law and in accordance with UMass Memorial policies.
- Do not tolerate acts of plagiarism, falsification, fabrication of data or other forms of scientific misconduct.
- Avoid conflicts of interest and do not participate in relationships or activities not otherwise approved by UMass Memorial or UMass Medical School that could influence or appear to influence our ability to protect research participants or compromise the validity of research results.

- Make sure that research reporting is accurate, complete and unbiased.
- Comply with requirements, terms and conditions of grant awards and contracts.
- Properly record and charge costs to appropriate accounts.

INTELLECTUAL PROPERTY

We are committed to the exchange of ideas and research findings with the broader academic and health care community. Whenever research results have the potential for commercialization, we take appropriate steps and protect the inventors' and UMass Memorial's intellectual property ownership interests.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)



DIGNITY AND HUMAN RIGHTS

“Being part of the union here at UMass Memorial helps give me a voice in my work through forums like our Unit Based Team. And it means that I can feel safe raising any concerns I may have.”

- Ambulatory Service Representative and SHARE Member

We are committed to respecting human rights and dignity. We comply with applicable laws pertaining to fair employment practices, freedom of association, privacy, collective bargaining, immigration, working time, wages and hours, as well as laws prohibiting forced and compulsory child labor and human trafficking.



INTEGRITY - EVERYONE, EVERYDAY

- Support efforts to eliminate human rights abuses by taking action:
 - If you have evidence or suspicions of human rights abuses in our operations or in the operations of our suppliers or business partners, report your concerns to the Compliance Office or use any of the reporting channels in this Code.
 - Remember that respect for human dignity begins with our daily interactions with one another and with our patients and their families. It also includes promoting diversity, equity, inclusion and belonging, accommodating disabilities, and protecting the rights and dignity of everyone with whom we interact.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)



ENVIRONMENTAL SUSTAINABILITY

We are committed to stewardship of the natural environment and complying with relevant environmental laws.

INTEGRITY - EVERYONE, EVERYDAY

- Do your part to help minimize the impact of our operations on the environment, while maintaining a healthy and safe workplace.
- If you discover an incident or condition that might result in an environmental regulatory violation or adverse environmental impact, report the situation to your supervisor.
- Be proactive and look for ways to reduce waste, use energy and natural resources more efficiently, and ultimately improve the health of our patients, workforce members and the community.



To Learn More

[Links to Policies](#) and [Links to Q&A/Resources](#)



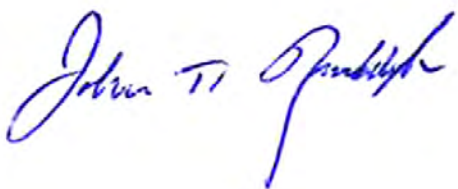
CLOSING THOUGHTS

Thank you for reading our Code of Ethics and Business Conduct. I hope it is a helpful resource for you to use when you have questions or are faced with difficult ethics and compliance decisions.

Each of us represents UMass Memorial to our community and our patients. They place their trust and their lives in our hands every day and we repay that trust with our continued commitment to integrity, quality care and our dedication to excellence.

Remember that we are a team and the resources mentioned throughout this Code are available to help. If you have any questions about a specific topic or suggestions about how we can improve our ethics and compliance initiatives, please do not hesitate to contact me.

Thank you for your hard work and dedication,



John Randolph

Vice President and Chief Compliance Officer
UMass Memorial Health



UMass Memorial Health supports workforce members' right to speak out about matters of public concern or engage in certain activities related to the terms and conditions of their employment. Nothing in this Code or in any of our policies is intended to limit or interfere with the right to engage in activities protected under Section 7 of the U.S. National Labor Relations Act, such as discussions related to wages, hours, working conditions, or health hazards and safety issues.