

Code of Conduct



[Revised November 2016]

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Letter from the Chief Executive Officer

A special message from Steven J. Corwin, M.D., President and Chief Executive Officer, to the employees, medical staff, and others who work or do business with the New York-Presbyterian community.



Our goal is to be the preeminent academic integrated delivery system in the country, providing the highest quality, safest, and most compassionate care to our patients and their families. To achieve our goal, we must be true to our commitment to **We Put Patients First**, and operate in a manner that satisfies regulatory requirements and social responsibility. Every employee, medical staff member, and all those doing business at or on behalf of New York-Presbyterian are expected to embrace our Culture and act with integrity, fairness, honesty, and in the best interests of our Institution and those we serve.

This is our Code of Conduct. It reflects current requirements in an ever-changing regulatory environment. This Code was approved by our Board of Trustees and articulates the principles that guide us. While each of us should take the time to read and familiarize ourselves with the Code, I want to emphasize the following:

1. Compliance is essential in every aspect of our business; we need to be aware of and adhere to all laws and regulations.
2. When issues or concerns are raised they will be addressed appropriately by our management team. It is management's job to foster an environment that facilitates problem identification and resolution. So, do not be afraid to ask.
3. Each of us has an affirmative duty to bring matters of concern to the attention of the appropriate personnel. You will be protected from retaliation or retribution for doing so in good faith.
4. The Code applies to all of us.

Please read this booklet carefully, paying particular attention to those aspects of the Code which apply to your area of responsibility. Use the information to guide your work at NYP. Thank you for your ongoing support, and for your commitment to our patients and their families.

Very truly yours,

A handwritten signature in black ink, appearing to be 'S. Corwin', written over a light blue horizontal line.

Steven J. Corwin, M.D.
President and Chief Executive Officer

Our Commitment

“We Put Patients First”

Our Vision

To Be the Top Academic Integrated Delivery System in the Nation in Patient Centered Care, Research and Education.

Our Culture

Responsibility Honoring Our Past, Ensuring Our Future

Excellence Exceptional Quality and Service

Empathy Listen, Understand and Respond

Respect Every Person Counts, Every Role Counts

Innovation Creative Ideas, Cutting Edge Solutions

Teamwork Working Together

RESPECT at New York–Presbyterian

At NYP, every person and every role counts. We will treat everyone as a valued human being, considering his or her feelings, needs, ideas, and preferences. We will honor everyone's contributions to creating a healing environment for our patients and families.

Our CREDO

As a member of the NYP community:

I believe

- » Every individual who comes to us for care and who works here, deserves my courtesy and respect
- » Every contact with a patient or co-worker is a chance to build a trusting relationship
- » It is my responsibility to honor our commitment to *We Put Patients First*
- » Teamwork and clear communication are necessary for providing the highest quality care
- » Every team member contributes to NYP's success

I will

- » Treat others as they want to be treated, with kindness, courtesy, and empathy
- » Show respect in my words, actions, communication, and body language
- » Listen to and respond to patients, families, and colleagues
- » Do my best to assist a patient or colleague asking for help
- » Assume the best of others and give them the benefit of the doubt
- » Be open to the ideas of others and handle differences of opinion constructively
- » Hold myself, my colleagues, and my team accountable for our work
- » Help foster an environment of professionalism, openness, and high ethical standards

I will not

- » Speak or act disrespectfully toward anyone
- » Engage in or tolerate abusive language and behavior
- » Speak negatively about patients or colleagues, especially in front of patients and visitors
- » Create an environment in which people are afraid to bring forward concerns or issues of safety
- » Act irresponsibly with NYP resources



Introduction

This Code, based on principles outlined in our Vision and Culture serves as the foundation of our Corporate Compliance Program. It applies equally to everyone. NYP's leadership has developed the Code of Conduct to reflect our culture and foster the delivery of the highest quality, most compassionate, patient centered care.

- To maintain an effective compliance program, we must all cooperate willingly and participate actively.
- We must report concerns or issues regarding noncompliance to those who can resolve the problem.
- We may report our concerns to any of the following individuals or departments: Our manager/supervisor, Human Resources, Legal Affairs, Corporate Compliance, Internal Audit or call the Compliance Helpline.
- We understand that we can report issues or problems without fear of retaliation from anyone connected with NYP as long as the reporting is done in good faith.

We recognize that we must act in accordance with the Code and conform to its standards, policies and procedures. We are aware that failure to do so can result in serious consequences for the individual employee or medical staff member, as well as for NYP.

Medical staff members, because they are employed by or appointed by the medical colleges, may have additional obligations.

While the Code is designed to provide overall guidance, it does not address every situation. More specific guidance is provided in our policies and procedures.

If questions or concerns persist about a compliance issue, we should contact the Office of Corporate Compliance at (212) 746-1406 or the confidential Helpline at 1-888-308-4435.



Quality of Care and Services

We will provide high quality care and skilled, compassionate, reliable service to our patients and to our community in a safe and healing environment. We will act in accordance with the provisions of the Patient Bill of Rights, as well as adhere to the following principles:

- We will honor the dignity and privacy of each of our patients and will treat them at all times with consideration, courtesy and respect.
- We will provide appropriate and timely care to all patients without regard to race, religion, age, gender, national origin, sexual orientation, disability or military status.
- We will, when a patient presents with an emergency medical condition, provide that patient with a screening examination and stabilization of any emergency condition in accordance with applicable laws, rules and regulations, regardless of the patient's ability to pay.
- We will transfer a patient only after the patient has been medically stabilized and an appropriate transfer has been arranged.
- We will have a qualified practitioner properly evaluate every patient before initiating a treatment plan.
- We will provide patient care that conforms to acceptable clinical and safety standards.
- All individuals employed or medical staff appointed to meet the needs of our patients will have the proper credentials, experience and expertise necessary to perform their duties.
- We will maintain complete and thorough records of patient information to fulfill the requirements set forth in our policies, accreditation standards and applicable laws and regulations.
- All patients asked to participate in a research project will be advised of the risks and benefits, as well as alternative services or treatments available. In addition, a patient's refusal to participate will not in any way affect his/her access to care or services provided by NYP.
- We will support and promote a continuous quality and performance improvement program throughout NYP.
- We will continuously strive toward a culture of patient safety.
- We will provide service to our patients and their families in a manner that embodies our philosophy of "We Put Patients First" and is aligned with the Commitment to Care service expectations for all NYP employees or medical staff.



Confidentiality and Privacy

We are committed to maintaining the confidentiality of patient and other information in accordance with legal and ethical standards. Breaches of confidentiality will not be tolerated.

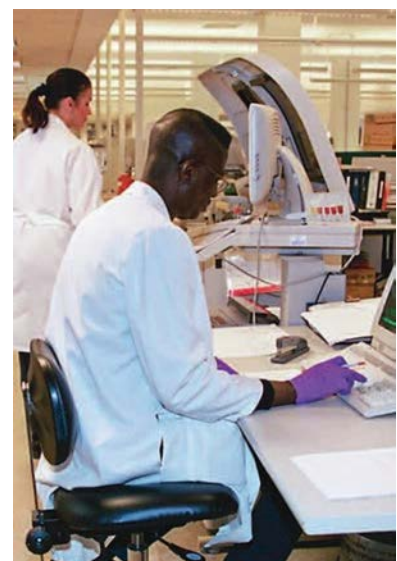
- We will adhere to all established confidentiality and privacy policies, procedures and laws including the Health Insurance Portability and Accountability Act (HIPAA).
- We will respect the privacy of our patients, fellow employees, and medical staff.
- We will actively protect and safeguard patients' health information and patients' personal information in all forms, including paper, electronic, verbal, telephonic, etc.
- We will access a patient's chart or medical data only when we are involved in that patient's care, or when we need access to the chart for a legitimate work-related reason such as billing, administrative, teaching or research requirements.
- We will not reveal information unless it is supported by a legitimate clinical or business purpose, in compliance with our policies and procedures, the Medical Staff Bylaws, and applicable laws, rules and regulations.
- We will not discuss patient information in any public area, including elevators, hallways and dining areas.
- We will not use or share "insider information," which is not otherwise available to the general public, for any direct or indirect personal gain or other improper use.
- We will carefully manage and maintain confidential and proprietary information to protect its value.
- We will not disclose other NYP financial information, including our financial performance and contract pricing for goods and services, without appropriate approval.
- We will treat as confidential, personnel files and records containing personal information such as demographic information, home address, social security number, account number, health information or health insurance identification number.
- We will maintain computer workstations and access codes in a confidential and responsible manner. We will not share computer identification information and passwords. We will lock or log off computers when stepping away.
- We will secure patient demographic and health information by using encrypted and password protected electronic devices only (i.e., flash drives, laptops, etc.)



Workplace Behavior and Equal Opportunity

We will treat all people with respect, dignity and courtesy. We recognize that our greatest strength lies in the talent of our staff who create the Organization's success and determine its reputation.

- We will provide employees non-discriminatory terms, conditions and privileges of employment, regardless of race, color, religion, sex, sexual orientation, national origin, age, marital status or military status, and without regard to the disability of qualified persons within the meaning of the applicable law.
- We will provide equal opportunity to all employees and applicants for employment without regard to race, color, religion, sex, national origin, citizenship status, marital status, veteran status, age, pregnancy status, sexual orientation and without regard to the disability of qualified persons within the meaning and subject to the conditions of applicable federal, state and city laws.
- We encourage teamwork and create structures, processes and programs that enable a positive culture to flourish. Disruptive behavior that intimidates others and affects morale or staff turnover will not be tolerated and will be addressed appropriately.
- We will not permit any act of retaliation or reprisal against an employee or medical staff member who in good faith reports a violation of law, regulation, standard, policy or the Code of Conduct.
- We support an alcohol, drug and smoke free workplace and abide by policies prohibiting illegal possession, distribution, use or being under the influence of illegal drugs, alcohol or other substances.
- We expect all employees and medical staff to conform to the standards of their professions and exercise appropriate judgment in the performance of their duties.
- We will screen all prospective employees and medical staff to assure that they have not been sanctioned by any regulatory agency and are eligible to perform their designated responsibilities.
- We are aware that every manager and clinical service chief is responsible for creating a work environment in which ethical concerns can be raised. If an employee raises an ethical question or concern, the manager must address it. If a manager or clinical service chief does not know how to respond, he or she should seek assistance through the chain of command, the Human Resources Department, the Office of Legal Affairs or the Office of Corporate Compliance.
- We will familiarize ourselves and comply with the contents of the Employee Handbook as well as with the policies and procedures applicable to our employment and responsibilities at NYP.



Business Ethics and Compliance with Laws and Regulations

We will follow the letter and spirit of applicable laws and regulations, conduct our business ethically and honestly, and act in a manner that enhances NYP's standing in the community and is sensitive to those whom we serve.

- We will demonstrate honesty, integrity and fairness in the performance of our duties.
- We will make every effort to prevent and detect, and we will report any fraudulent, wasteful or abusive activity which may affect our resources or our interactions with the federal, state or local governments.
- We will report any practice or condition that may violate any law, rule, regulation, safety standard, policy or the Code of Conduct to appropriate levels of management, the Office of Legal Affairs or the Office of Corporate Compliance.
- We will adhere to all applicable laws, regulations and professional standards regarding financial reporting and disclosures. We will submit accurate claims and reports to the federal, state and local governments.
- We are strictly prohibited from giving or receiving any form of payment, kickback or bribe to induce the referral or the purchase of any healthcare service.
- We will not offer any improper inducement or favor to patients, physicians or others to encourage the referral of patients to our facilities.
- We will not accept any improper inducements or favors from vendors to influence our patients or others connected with NYP to use a particular product or service.
- We will inform vendors of our policies regarding ethical business conduct and compliance with law, as well as our expectation that vendors act in accordance with such law and policies.
- We will inform vendors who are our business associates of their requirements under HIPAA to safeguard information and report security breaches.



- We will avoid agreements or other actions that may unfairly restrain trade or reduce competition.
- We will be aware of situations that may present potential antitrust issues and avoid inappropriate discussions with competitors regarding business issues. This includes prices for goods and services, salaries and benefits, payment rates and business plans.
- We will market and advertise accurately and in compliance with laws and regulations.
- We will verify that our contracts for services to be provided to NYP are in compliance with the Anti-kickback and Stark laws. All payments made by NYP must be supported by appropriate documentation.
- We will procure, maintain, dispense and transport drugs and controlled substances used in the treatment of patients according to applicable laws and regulations.
- We will not make any verbal or written false or misleading statements to a government agency or other payer.
- We will not pursue any business opportunity that requires unethical or illegal activity.
- We will provide reports or other information required by any federal, state or local government agency on time, accurately and according to applicable laws and regulations.
- We will comply with federal regulations regarding government contracts and programs in which we participate. We will provide managers and employees who work in relevant areas with knowledge of the governing rules and regulations.
- We will not engage in lobbying activities on behalf of NYP that are inconsistent with the laws, rules or regulations applicable to tax-exempt entities.
- We will conduct fundraising in accordance with all applicable laws and regulations and policies and procedures.
- We will adhere to our policies and procedures relating to Business Ethics and Compliance, including the following:
 - √ Billing and Claims Reimbursement
 - √ Business Expense Reimbursement
 - √ Code of Conduct
 - √ Conflicts of Interest – Gifts & Gratuities
 - √ Conflicts of Interest – Speaking Engagements and Honoraria
 - √ Corporate Compliance Plan
 - √ Employee Compliance Helpline Operations
 - √ Federal Deficit Reduction Act of 2005 Fraud and Abuse Provisions
 - √ Foreign Corrupt Practices Act
 - √ Medical Sales Representatives
 - √ Non-Retaliation
 - √ Organizational Ethics
 - √ Possible Identity Theft: “Red Flags” Rule
 - √ Sanctions Screening

Conflicts of Interest

We will perform our duties on behalf of NYP and its patients. We will avoid conflicts or the appearance of conflicts between our own interests or an outside interest and the interests of NYP.

- We will devote our full time and ability to NYP during our hours of work at NYP.
- We will not engage in any activity, practice or act that creates an actual or apparent conflict with the interests of NYP.
- We will report actual or potential conflicts of interest to our manager, clinical service chief, and/or the Office of Corporate Compliance.
- We encourage employee and medical staff involvement in community activities. However, personal fund raising activities that do not benefit NYP are prohibited from being conducted on site or during work hours. This prohibition includes use of NYP facilities and resources (e.g. computers, letterhead).
- We will act solely in the best interest of NYP, as an agent of NYP, and in our dealings with suppliers, customers or government agencies. This obligation includes those acts formalized in written contracts, as well as everyday business relationships with vendors, customers, government officials and government employees.
- We will promptly and accurately complete any conflict of interest forms which we may be asked to submit.
- Medical staff members must complete, at a minimum, a conflict of interest form on every reappointment and will update the information as appropriate.

The following situations are potential conflicts of interest and must be disclosed to the Office of Corporate Compliance:

Placing business with a vendor when we have a financial interest

We will avoid placing business with any vendor of NYP, in which we or members of our immediate family have a direct or indirect interest, employment or other financial relationship, unless the relationship is disclosed and approved according to policy.



Providing services for vendors, competitors, or other outside organizations. This includes any institution, but especially competitors and those currently doing business or seeking to do business with NYP

We will avoid involving ourselves in any enterprise that does business or competes with NYP when that connection might influence our decisions or affect our ability to perform our functions. If such involvements are necessary, they must be disclosed and approved in accordance with NYP's conflict of interest policy.

Participating on outside boards of directors/trustees of competitors or those doing business with or on behalf of NYP

We will disclose to the Office of Corporate Compliance, utilizing the conflict of interest form or other appropriate means any situation where we serve as a director, trustee or officer of an organization whose interest may compete or conflict with NYP. We will provide such disclosure promptly.

Having a directorial, supervisory or subordinate relationship with a relative, or hiring a relative

We will not employ members of the same family in an organizational unit where one Supervisor supervises them or where one of them supervises others in the family unit (spouse, children, parents, in-laws or siblings). NYP reserves the right to avoid the possibility of nepotism by unilateral transfer of the individuals concerned.



Improper gifts and gratuities

We will not solicit or accept cash or in-kind contributions from vendors, suppliers or other contractors in support of any activity of NYP unless approved by the Development Office and/or the Office of Corporate Compliance.

Employees will not accept cash or cash-equivalent gifts in any amount provided in connection with our employment. Non-cash gifts of nominal value (not exceeding \$100) that are given on occasions when gifts are customary but not in appreciation for good service or as thanks for business and reasonable meal and entertainment courtesies may be accepted. Non-cash gifts that exceed nominal value may not be accepted. If we have a question as to the value or the appropriateness of a gift, we should review NYP's conflict of interest policy and then seek approval from our manager or the Office of Corporate Compliance.

Coding and Billing

We will code and bill accurately and document the services rendered and the amounts billed. Communication among the clinicians, the coders and the billers is required so that accurate information is provided.

- We will maintain appropriate documentation to support coding and billing.
- We will bill for services according to medical necessity guidelines established by the various payers.
- We will code and bill only for services that were actually rendered.
- We will properly train staff and provide them with coding and billing updates in a timely manner.
- We will bill in compliance with rules and regulations regarding teaching physicians and resident requirements at teaching hospitals.
- We will notify the payer of payment errors and process refunds promptly and accurately.
- We do not routinely waive patients' coinsurances and deductibles. However, when it is done, it will be in accordance with law and established rules, policies and procedures.
- We will maintain complete and thorough records to fulfill requirements set forth in our policies and procedures, accreditation standards and applicable laws and regulations.
- We will continually evaluate our coding and billing activities to identify areas for improvement. We will make special note of concerns identified by regulators (e.g. laboratory services, clinical trials, bad debts, transfers) to mitigate the risk of improper billing.
- We strive to identify errors, report them to our managers or the appropriate NYP authority and correct them in a timely and appropriate manner.
- Our billing is the result of complete and accurate coding, which is based upon complete and accurate documentation of all diagnoses and procedures.



Safeguarding Resources/Assets

We will protect our assets and the assets of others entrusted to NYP against loss, theft or misuse. This includes physical and intellectual property.

- We will maintain internal controls within our areas of responsibility to safeguard NYP's assets and verify the accuracy of financial statements and all other records and reports.
- We will use NYP property appropriately and take measures to prevent any unexpected loss of equipment, supplies, materials or services. We are aware that managers or clinical service chiefs must approve any personal use of NYP equipment, supplies, materials or services.
- Employees will report time and attendance accurately and will work productively while on duty.
- Travel and entertainment expenses should be consistent with our job responsibilities, NYP's needs and in accordance with policy.
- We will issue and maintain financial reports, accounting records, research reports, expense accounts, time sheets and other documents that are accurate and clearly reflect the true nature of transactions.
- We will follow the laws regarding intellectual properties, including patents, trademarks, marketing, copyrights and software.
- We will not copy NYP computer software unless it is specifically allowed in the license agreement.
- We will adhere to established policies and procedures governing record management and comply with the record retention and destruction policies/schedules for our departments.



Environmental Considerations

We will provide a safe and secure environment for patients, staff and visitors.

- The safety and security of patients, employees and medical staff in all of our activities is paramount.
- We will report any unsafe condition to our manager or the Safety Office to correct the problem.
- We will exercise good judgment with regard to the environmental aspects of the use of NYP buildings, property, laboratory processes and medical products.
- We will comply with established Safety and Infection Control policies and procedures, which are intended to avoid job-related hazards and maintain a safe work environment.
- NYP is a smoke-free environment and we will comply with established policies in this matter.
- We will comply with all laws and regulations governing the handling, storage, use and disposal of hazardous materials, other pollutants and infectious wastes.
- We will comply with permit requirements that allow for the safe discharge of pollutants into the air, sewage systems, water or land.
- We understand that NYP will pursue initiatives based on specific threats on-site or in our community.
- We will report any violation of safety policies and procedures, laws, regulations or standards to our manager or supervisor. If we are not satisfied that the issue has been addressed, we will notify the Safety Office or the Office of Corporate Compliance.
- Any individual working at NYP is required to wear the appropriate identification card. If asked, an employee or medical staff member will identify themselves by name and department.



Employee Issues and Concerns

It is our responsibility to understand and comply with applicable rules, regulations and laws that govern NYP and its employees. We will also comply with the “Code of Conduct” and “Principles of Behavior.” We understand that violating the principles of the Code can result in corrective action, up to and including termination.

- If there is a question or concern about a situation that we believe may be illegal or unethical, we may first seek guidance from our manager. If we are uncomfortable addressing the issue with our manager or the manager has failed to address the issue in a timely manner, we will inform one of the following: senior management, Office of Legal Affairs, Human Resources or the Office of Corporate Compliance.
- Management is responsible for responding to issues or concerns identified by employees. If a manager is unable to respond to an employee, he/she is encouraged to seek guidance from a superior and, if necessary, the Office of Corporate Compliance.
- We are aware that NYP has established a toll-free Compliance Helpline. The number is 1-888-308-4435 and it operates 24 hours a day, seven days a week. The Compliance Helpline is operated by an outside organization and can take calls in English and in Spanish. Reports received by the Helpline will be investigated promptly by the Office of Corporate Compliance. Calls may be made anonymously, and every effort will be made to maintain the confidentiality of the information provided.
- In addition to other issues, the Helpline may be used to report complaints regarding accounting, internal accounting controls or auditing matters related to the accuracy or integrity of NYP's financial statements. Such matters will be investigated by the Compliance Office and reported to the Audit and Corporate Compliance Committee of the Board of Trustees.
- We may report concerns or raise questions through any of the aforementioned channels. We are aware that employees who fail to report a suspected or known violation of the Code of Conduct or other policies and procedures may be subject to corrective action.

