Code of Ethical Conduct

“Working Together for Quality”

Corporate Compliance HelpLine

Toll-free, anonymous, confidential, non-retaliatory reporting, available 24 hours, 7 days a week

To report concerns, problems or violations, call 1-800-894-3226 or visit www.northshore-lij.ethicspoint.com or Corporate Compliance Office (516) 465-8097

Quality • Integrity • Community • Trust • Respect • Caring
Dear Colleague,

Welcome to the North Shore-LIJ Health System and Health Plan’s Code of Ethical Conduct. Why do we have a Code? Our Code demonstrates that we are committed to honesty, integrity and ethical behavior in all aspects of our work. We strive to provide the highest quality patient care, protect patient privacy, and work honestly and fairly with our business partners and government regulators.

Equally important is the commitment we make to each other as colleagues. We are committed to providing a workplace that is free from discrimination, harassment and retaliation. North Shore-LIJ values the contributions of everyone affiliated with our hospitals and facilities.

We are very proud of the many quality awards the health system has received in the past few years. Recently, our hospitals received 68 overall quality awards and a total of more than $900,000 in financial incentives from the US Centers for Medicare and Medicaid Services’ Hospital Quality Improvement Demonstration.

Compliance is an integral part of quality. Unless we follow the rules and comply with all relevant state and federal laws governing healthcare, we cannot continue to provide high quality care. Our Code can help you when you need guidance on compliance-related issues. North Shore-LIJ’s policies and procedures tell us how to do our jobs the right way every day.

This Code also establishes the foundation we need to maintain the trust of our patients, members, communities, and employees, as well as those who do business with North Shore-LIJ. The Code provides tools that help ensure that our work is done in an ethical and legal manner. It also contains resources that can help you get assistance when you believe the Code may have been violated. As a condition of your association with North Shore-LIJ, you are required to know the provisions of the Code and to report any activity that may constitute a violation.

If you become aware of any such activity, you should report it immediately to your supervisor, to another member of senior management at your facility, or to the Office of Corporate Compliance at (516) 465-8097. You can also make a confidential report to the Compliance Help-Line, 24 hours a day, 7 days a week, by calling (800) 894-3226 or by visiting www.northshore-lij.ethicspoint.com online. You can make a report anonymously if you choose to do so. You will not experience retaliation for asking questions or reporting concerns about the Code or about conduct you have observed in the workplace.

Compliance is the responsibility of every member of the North Shore-LIJ community. We expect everyone’s professional conduct to reflect the ethical standards set forth in the Code. I need your help and commitment to achieve these important goals. Please join me in working to maintain North Shore-LIJ’s reputation as a leader in the healthcare industry and a model of integrity and compliance.

Michael J. Dowling
President and Chief Executive Officer
North Shore-LIJ Health System
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Our Commitment to Compliance

The Code of Ethical Conduct

The Code of Ethical Conduct gives us guidance so that we can carry out the mission and vision of the North Shore-LIJ Health System and Health Plan (NSLIJ). The Code reflects NSLIJ’s core values which are:

- Patient and member experience – Always put our patients and members first
- Integrity – Be professional, honest and protect privacy
- Teamwork – Work together and communicate effectively
- Innovation – Initiate change and promote creativity
- Caring – Be compassionate, respectful and supportive
- Excellence – Pursue greatness with passion and promote quality

Our Code provides guidance for you so that you can respond properly when compliance-related issues arise. It is designed to assist you in the performance of your job within appropriate moral, ethical and legal standards. The Code is not intended to cover every situation. Rather, it can help you to make the right decisions or ask the right questions.

We expect and require everyone affiliated with NSLIJ to perform their job duties and responsibilities in a law-abiding, honest and trustworthy manner.

The Code and the associated NSLIJ policies and procedures apply to virtually everyone who has a relationship with our organization, including but not limited to, Board members, officers, employed and non-employed staff, vendors, volunteers, consultants and contractors. We also expect all individuals and organizations working on behalf of NSLIJ to adhere to the ethical standards set out in the Code.

We are committed to having an ethical environment at NSLIJ founded on these principles of conduct:

- Treat patients, members, staff and the public with dignity and respect
- Abide by applicable laws, rules, guidelines and procedures
- Behave honestly and fairly and be truthful and accurate in all communications
- Use good judgment and high ethical standards in all business dealings
- Safeguard confidential patient, member, employee health and other private information
- Protect trade secrets, competitive and other business information
- Maintain accurate and timely records
- Strive for mutual respect and trust in work relationships
- Ensure a safe and healthy work environment
- Avoid conflicts of interest
- Guard against theft and misuse of health system property and other assets
- When in doubt about a situation, ask before acting

Everyone at NSLIJ is responsible for maintaining an ethical environment. Your actions in the workplace must demonstrate your commitment to honesty, integrity and accountability every day. Your job performance will be evaluated, in part, based on your compliance with the Code and with NSLIJ’s compliance-related policies and procedures.

Certain NSLIJ compliance policies are referenced in this Code. Other compliance policies can be reviewed and downloaded from HealthPort, NSLIJ’s intranet site, on the Office of Corporate Compliance web page or obtained from a supervisor in hard copy form.

YOU HAVE A DUTY TO KNOW, UNDERSTAND AND COMPLY WITH THE REQUIREMENTS OF ALL NSLIJ POLICIES, REGARDLESS OF WHETHER THEY ARE REFERENCED IN THIS CODE.
**NSLIJ’s Compliance Program**

NSLIJ’s Compliance Program demonstrates our firm commitment to the highest standards of ethics and compliance.

- The NSLIJ Board of Trustees is responsible for guiding the Compliance Program. The Vice President and Chief Corporate Compliance Officer reports to the Audit and Corporate Compliance and the Executive Committee of the Board and the full Board on a periodic basis to ensure that the Trustees are fully informed on compliance issues and that transparency exists in the program at all times.

- The Chief Corporate Compliance Officer leads the Office and also reports to the President and CEO of NSLIJ, and to the General Counsel.

- NSLIJ also has an Executive Audit and Compliance Committee consisting of members of senior management and led by the Chief Corporate Compliance Officer. This committee provides direction, oversight and guidance to the Compliance Program.

The Office of Corporate Compliance carries out the day-to-day implementation of the Compliance Program. The staff of the Office is comprised of a team of ethics and compliance professionals who are experienced in the areas of coding, billing, auditing, ethics and quality. For more information about NSLIJ’s Compliance Program, visit the Office of Corporate Compliance web page on HealthPort.

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**Special Responsibilities of Supervisors and Managers**

NSLIJ’s supervisors and managers have a special responsibility to set the right ethical tone. Supervisors and managers must:

- Make sure that their work areas reflect NSLIJ’s commitment to compliance and quality healthcare
- Create a work environment in which concerns can be raised and openly discussed without fear of retaliation
- Promote honesty and integrity and model it for others

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**Discipline**

Anyone employed by NSLIJ who violates the Code or related policies and procedures will be subject to disciplinary action. The discipline imposed will be determined on a case-by-case basis and will depend upon the nature, severity and frequency of the violation.

The disciplinary policy will be firmly and fairly enforced with respect to all persons affiliated with NSLIJ.

Possible disciplinary actions include:

- verbal warning
- written warning
- suspension
- termination of employment
Duty to Comply and Report

Reporting Obligations
It is the duty of every trustee, officer, employee and all other individuals affiliated with NSLIJ to comply fully with all governing laws, regulations, NSLIJ policies and procedures and the Code. Everyone must offer their complete cooperation with any investigation by NSLIJ and/or governing authorities.

ENSURING COMPLIANCE WITH THE MANY LAWS, RULES, REGULATIONS AND INDUSTRY STANDARDS THAT GOVERN THE OPERATIONS OF NSLIJ REQUIRES TEAMWORK. FOR THIS EFFORT TO BE SUCCESSFUL, EVERYONE WHO IS EMPLOYED BY OR AFFILIATED WITH NSLIJ MUST WORK TOGETHER.

WE CANNOT CONTINUE TO ACT WITH HONESTY AND INTEGRITY WITHOUT YOUR HELP.

You are required to report to the Office of Corporate Compliance or the Compliance HelpLine any actual or suspected violations of the Code, NSLIJ’s policies and procedures and/or federal or state law. You also must report any other compliance-related issues, including but not limited to, conflicts of interest, fraud, or other misconduct of any type relating to the NSLIJ’s operations.

Consequences for Not Reporting Potential Compliance Issues
The failure to comply with the laws and/or to report suspected violations of state or federal law can have very serious consequences for NSLIJ and for any affiliated individual who fails to comply or report. The individual may be terminated from employment (or from his/her contractual arrangement with NSLIJ) or be subject to other disciplinary measures, depending on the nature of the violation.

Q&A

Q: How do I report a compliance-related concern?
A: You can call the HelpLine at (800) 894-3226 or report online at northshore-lij.ethicspoint.com. You can also report the matter directly to the Office of Corporate Compliance at (516) 465-8097 or to your supervisor or another manager in your facility.

Non-Retaliation and Non-Intimidation

WE DO NOT PERMIT ANYONE TO RETALIATE IN ANY MANNER AGAINST AN INDIVIDUAL WHO REPORTS ANY POTENTIAL COMPLIANCE PROBLEM OR VIOLATION OF LAW IN GOOD FAITH.

NSLIJ also prohibits anyone from intimidating an employee who discloses a compliance concern. NSLIJ will immediately investigate and take appropriate action with respect to all suspected acts of retaliation or intimidation. Any individual who is found to have retaliated against an employee or intimidated an employee will be subject to immediate discipline, up to and including termination of employment.

RELATED POLICIES:
• NSLIJ Policy #800.01, “Non-Intimidation and Non-Retaliation”
• NSLIJ Policy #800.09, “Detecting and Preventing Fraud, Waste and Abuse”
• NSLIJ Policy #800.08, “Compliance Helpline”
• NSLIJ Human Resources Policy Part V, Section 3, “Employee Conduct in the Workplace/Progressive Discipline”

Responding to Potential Compliance Issues
NSLIJ is committed to investigating all reported concerns promptly, thoroughly and confidentially, to the extent possible and appropriate. The Chief Corporate Compliance Officer directs the investigation of compliance concerns. Where an internal investigation substantiates a reported violation, we initiate corrective actions or other changes that need to be made in order to remedy the problem. These actions can include making prompt repayment of any government funds to which we are not entitled, notifying the appropriate government agency, instituting disciplinary action, and implementing systemic changes to prevent a reoccurrence of the problem.

Deficit Reduction Act of 2005 – False Claims Acts
Under the Deficit Reduction Act of 2005, any employer who receives more than $5 million per year in Medicaid payments is required to provide information to its employees about the
Federal and New York State False Claims Acts, the rights of employees to be protected as whistleblowers, and the employer’s policies and procedures for detecting and preventing fraud, waste and abuse.

**THE FEDERAL AND NEW YORK STATE FALSE CLAIMS ACTS IMPOSE LIABILITY ON ANY PERSON WHO SUBMITS A CLAIM TO THE FEDERAL GOVERNMENT THAT HE OR SHE KNOWS TO BE FALSE.**

The Acts also impose liability on individuals who knowingly submit a false record in order to obtain payment from the government or who obtain money from the federal government to which he or she is not entitled and then uses false statements or records in order to retain the money.

The Acts permit private parties to bring actions to recover money on behalf of the United States and to share in a percentage of the proceeds obtained by the government. Persons who bring these actions are protected against retaliation.

Examples of false claims include:

- Billing for a higher level of services than were actually performed
- Billing for services that were not medically necessary
- Billing multiple codes instead of one billing code for a drug panel test to increase reimbursement
- Submitting a claim under one patient’s name when services were provided to another person
- Altering claims forms or medical records
- Billing for services provided by an unlicensed provider
- Failing to repay overpayments within 60 days after identification
- Submitting false or inaccurate pricing or rebate information on pharmaceuticals to a Federal health care program
- Enrolling a beneficiary in a Medicare Advantage program without the beneficiary’s consent

**RELATED POLICY**

- NSLIJ Policy #800.09, “Detecting and Preventing Fraud, Waste and Abuse”

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**Our Commitment to Our Patients and Members**

**High Quality Patient and Member Care**

NSLIJ’s number one priority is the delivery of the highest quality of care possible. Our main concern is for the well being, comfort and dignity of our patients and members. We do not make a distinction in the availability of services or the care we provide based on age, gender, disability, race, color, religion, national origin, actual or perceived sexual orientation, marital status, veteran status or based on the source of payment for the patient or member’s services or the patient or member’s ability to pay.

**Our commitment to Quality of Care and Patient and Member Safety**

NSLIJ’s number one priority is the delivery of the highest quality of care possible. Our main concern is for the well being, comfort and dignity of our patients and members. We do not make a distinction in the availability of services or the care we provide based on age, gender, disability, race, color, religion, national origin, actual or perceived sexual orientation, marital status, veteran status or based on the source of payment for the patient or member’s services or the patient or member’s ability to pay.

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**Patient and Member Choice**

All patient care at NSLIJ is administered in accordance with the “Patient’s Bill of Rights in New York State.” Every patient is provided with a statement of these rights and with a Notice of Privacy Practices. These patient rights include:

- The right to make decisions regarding medical care,
- The right to refuse or accept treatment,
The right to informed decision-making, and
Rights related to how the patient’s health information is used and maintained by NSLIJ.

WE LISTEN TO AND FOLLOW THE CHOICES MADE BY OUR PATIENTS AND MEMBERS WITH RESPECT TO THEIR CLINICAL CARE, AS REQUIRED BY LAW.

We are responsible for informing patients about their proposed plan of care, including the risks, benefits and alternatives available to them. We respect patients’ rights to make informed decisions about treatment, as well as to establish and have followed advance directives. Patients are free to choose their service providers, including but not limited to, physicians and ancillary service providers such as home health, home infusion and durable medical equipment suppliers.

Emergency Treatment
We follow the Emergency Medical Treatment and Active Labor Act (EMTALA) in providing an emergency medical screening examination and necessary stabilization to all persons who present themselves for emergency care, regardless of ability to pay or any other discriminatory factor. Patients with emergency medical conditions are transferred to another facility at the patient’s request or if the patient’s medical needs cannot be met at NSLIJ facilities because we do not have the capacity or capability to do so. Patients must consent to any transfer and all transfers are accomplished in strict compliance with state and federal EMTALA regulatory and statutory requirements.

Q: May I delay the examination or treatment of an ER patient in a life-threatening situation to obtain financial and demographic information about the patient?
A: No. Appropriate care must be provided in a timely manner and cannot be delayed while information is obtained from the patient.

Safeguarding Patient and Member Information
We demonstrate our respect for our patients and members by protecting the confidentiality of all personal information they share with us for the purpose of receiving quality medical care. This information, known as “Protected Health Information” or “PHI,” can include patients’ names, addresses, phone numbers, Social Security numbers, medical diagnoses, family illnesses and other personal information. Federal and state laws, as well as quality of care standards, require us to keep this information confidential. NSLIJ employees or members who are patients in our facilities also must be accorded the highest level of confidentiality with respect to their medical records and the PHI contained in them.

We must never use, disclose or discuss patient and member specific information except as necessary for patient and member care or as required by law.

Subject to emergency exceptions, patient and member privacy will be protected and patient and member specific information will be released only to persons authorized by law or by the patient or member’s written authorization. It is inappropriate to:

Discuss patients or members’ cases in a public area where conversation may be overheard by others,
Permit access to a patient or member’s record by individuals who are not involved in legitimate activities relating to the patient, and
Access employees’ medical records when they are receiving medical care at our facilities, unless it is for treatment, payment or health care operations.

If you are unsure of the rules governing the release of patient and member related data, ask and be sure you understand them before you release any information.

Anyone affiliated with NSLIJ who engages in unauthorized access or disclosure of patient and member information will be subject to disciplinary action up to and including termination of employment. Individuals also may be subject to civil or criminal penalties.

IF YOU BECOME AWARE OF AN UNAUTHORIZED DISCLOSURE OF PATIENT OR MEMBER INFORMATION, YOU MUST REPORT IT IMMEDIATELY TO YOUR SUPERVISOR OR TO THE OFFICE OF CORPORATE COMPLIANCE. NSLIJ PROHIBITS RETALIATION AGAINST ANY PERSON WHO MAKES A GOOD FAITH REPORT OF A PRIVACY VIOLATION.

KEY RELATED POLICIES:
• NSLIJ Policy #800.02, “Use, Access and Disclosure of PHI with Valid Authorization”
• NSLIJ Policy #800.17, “Federal and State Privacy Breach Notifications”
• NSLIJ Policy #800.42, “Confidentiality of Protected Health Information”
• NSLIJ Policy #800.45, “Notice of Privacy Practices”
• NSLIJ Policy #800.11, “Identity Theft Prevention Program”

Patient Records
We make every effort to ensure that entries we make into patient or member records are clear and complete and reflect exactly the item or service that was provided to the patient. The NSLIJ Health System strives to ensure that our records never include guesswork, exaggeration, or miscoding.
Research
We conduct research according to the highest ethical standards and in full compliance with federal and state laws and regulations. We do not tolerate research misconduct.

OUR FIRST PRIORITY IS ALWAYS TO PROTECT THE PATIENTS AND MEMBERS AND RESPECT THEIR RIGHTS DURING RESEARCH, INVESTIGATIONS AND CLINICAL TRIALS.

When we ask patients or members to participate in research projects, we will advise them of all alternative treatments available to them and the risks and benefits of the proposed treatments. We want patients and members to make informed decisions as to whether or not to participate in research projects.

If you have any questions about the conduct of research with patients or members, you may contact the Office of the Institutional Review Board (IRB) at (516) 719-3100.

If you wish to report a compliance-related concern about any research being conducted at NSLIJ, you can call the HelpLine 24 hours a day, seven days a week at (800) 894-3226 or visit www.northshore-lij.ethicspoint.com online.

Q&A

Q: What is an IRB?

A: The IRB is a committee of people from various backgrounds, including NSLIJ employees and community members, who are responsible for protecting the rights and welfare of patients and members who participate in research studies.

Responsible Conduct of Research
Truth, integrity and credibility are critical and distinctive principles of NSLIJ and the Feinstein Institute for Medical Research.

These principles are essential for the progress of scientific research and to preserve the trust of the public in the research community. NSLIJ has set standards and procedures for its researchers in order to preserve truth, integrity and credibility in research, to prevent research misconduct, and to deal efficiently and fairly with allegations or other indications of research misconduct.

KEY RELATED POLICIES:
• NSLIJ Policy #GR081, “Research Misconduct”
• NSLIJ Policy #GR053, “Research at the North Shore-LIJ Health System”
• NSLIJ Policy #GR056, “Research with Human Subjects”

Credentialing
One important aspect of our commitment to high quality care is the proper credentialing of all health care providers associated with our institutions.

WE ENSURE THAT OUR PROVIDERS ARE APPROPRIATELY CREDENTIALED AND THAT THEIR WORK IS WITHIN THE PARAMETERS OF THEIR RESPECTIVE LICENSES.

We conduct credentialing reviews for:
- Hospital employees whose work requires licenses, and
- Temporary and non-employed staff, such as voluntary physicians, visiting physicians, agency-employed nurses, and our provider network.

Credentialing reviews occur before the relationship between NSLIJ and an individual commences. We recertify those credentials at regular intervals in accordance with regulatory requirements. We also conduct background checks on individuals who work in our facilities, regardless of whether their position requires a license, to ensure that they do not have criminal backgrounds.

Q&A

Q: What should I do if I observe or suspect misconduct in research?

A: You must report it immediately to the Research Integrity Officer, Dr. Bettie Steinberg, at (516) 562-1159 or to any Feinstein Institute official, the HelpLine at (800) 894-3226 or online at www.northshore-lij.ethicspoint.com or the Office of Corporate Compliance at (516) 465-8097. Any employee who reports such information in good faith will be protected against retaliation for making the report.
**Adverse Event Reporting**
New York State law requires us to report to the Department of Health certain adverse patient events within 24 hours after their occurrence. Our health care providers are required to report such incidents to designated NSLIJ administrators immediately upon learning of them. Failure to do so constitutes an unacceptable practice and is grounds for discipline.

**Marketing and Advertising**
We market NSLIJ’s services in a fair, truthful and ethical manner and adhere to the applicable federal and state regulatory standards. Our marketing materials are designed to reflect only the services available and the level of the provider’s licensure and accreditation. NSLIJ uses marketing and advertising to educate the public, report to our community, increase awareness of our services and to recruit staff members.

**Our Commitment to Government Regulators**

**Coding and Billing**
One of the most important aspects of NSLIJ’s commitment to compliance is our dedication to the preparation and submission of accurate claims for payment to federal and state health care programs.

**WE HAVE A ZERO TOLERANCE POLICY WITH RESPECT TO BILLING FOR IMPROPER CLAIMS.**

All claims for payment for any service provided by NSLIJ must be supported by complete documentation in the medical record, proper coding based on that record and bills that accurately reflect the coding. We can bill only for those goods and services actually provided and medically necessary.

Accurate and timely documentation also depends on the diligence and attention of physicians who treat patients in our facilities. We expect those physicians to provide us with complete and accurate information in a timely manner.

NSLIJ should always bill accurately for services rendered in accordance with the law and with its agreements with third party payers. When we receive a question from a patient, member or a third-party payer about an invoice or charge, we promptly address the question, if authorized to do so, or refer the matter to the person who is authorized to address it.

**Q&A**

**Q:** What should I do when I receive a question from a patient, member or a third-party payer about an invoice or a charge on a patient or member’s bill?

**A:** You should first promptly address the question or issue if it is within your job duties and responsibilities to do so. Unresolved disputes should be referred to your supervisor for resolution.

Under federal law, all identified overpayments must be refunded to the government payer within 60 days of identification. Failure to do so can result in fines and other penalties.
**Cost Reports**

NSLIJ receives reimbursement under federal and state health care programs. These programs require us to submit complete and accurate reports of our costs of operation and other information.

**WE COMPLY WITH ALL APPLICABLE LEGAL, REGULATORY AND PROGRAM REQUIREMENTS IN THE PREPARATION OF OUR COST REPORTS.**

These laws, regulations and guidelines define what costs are allowable and outline the appropriate methodologies to claim reimbursement for the cost of services provided to program beneficiaries.

**Anti-Kickback/Bribes**

NSLIJ strictly prohibits its employees and other service providers from offering, paying, asking for, or accepting money or other benefits in exchange for patient or member referrals, purchases, leases or orders.

**Not-For-Profit Tax-Exempt Status**

NSLIJ is a tax-exempt entity because of its charitable mission. We provide community benefits that include health care services, medical training, education, research and community outreach activities.

**WE MUST USE NSLIJ’S RESOURCES IN A MANNER THAT FURThERS THE PUBLIC GOOD RATHER THAN THE PRIVATE OR PERSONAL INTERESTS OF ANY INDIVIDUAL OR ENTITY.**

**Antitrust**

NSLIJ engages in activities that are subject to state and federal antitrust laws. Generally, these laws prohibit competitors from entering into agreements to fix prices or to reduce price competition. We should not provide information about NSLIJ’s business to a competitor. In addition, we are to refrain from engaging in unfair practices that might restrict competition.

**Record Retention**

Accurate and complete records are crucial for the continuity of patient care, appropriate and proper billing, and for compliance with regulatory, tax, and financial reporting requirements. Everyone who enters information into a medical record, business record, regulatory or financial report has a responsibility to do so in a truthful, accurate, legible and timely manner. Records must be retained by NSLIJ, as required by federal and state laws.

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**Response to Governmental Inquiries**

NSLIJ cooperates fully with government inquiries and investigations. We do not prevent persons affiliated with us from speaking with government officials. However, you should contact your supervisor and the Office of Legal Affairs before doing so. When we receive a request for documents or a subpoena, we refer it to the Office of Legal Affairs, which will coordinate our response and ensure that it is appropriate and complete. We never destroy, alter or change NSLIJ records requested by or related to a government investigation.

**WHEN WE RECEIVE NOTICE OF AN INVESTIGATION OR LAWSUIT, A REQUEST FOR DOCUMENTS, OR A SUBPOENA, WE PRESERVE ALL RELATED RECORDS AND COOPERATE WITH THE OFFICE OF LEGAL AFFAIRS IN MAKING THEM READY FOR EVALUATION AND/OR PRODUCTION.**

**RELATED POLICIES:**

• NSLIJ Policy #800-48, “Responding to Government Inquiries”
• NSLIJ Policy #GR027, “Preparation for an External Regulatory Research Inspection at a Clinical Site”

**Accreditation and Surveys**

In preparation for, during, or after surveys, NSLIJ employees and affiliated persons deal with all accrediting bodies in a direct, open and honest manner. No action should ever be taken in relationships with accrediting bodies that would mislead the accrediting organization or its survey teams, either directly or indirectly.
Our Commitment to Our Business Partners

Our business partners — suppliers, contractors, physicians, and others with whom we do business — are vital to our success. We always treat them with respect, professionalism and fairness.

We examine the background of our business partners before allying with them to ensure they demonstrate high standards of ethical business conduct.

Supplier, Vendor, Subcontractor, Attorney and Consultant Relationships

NSLIJ selects our suppliers, vendors, subcontractors, attorneys and consultants based on the quality, price, delivery and supply of their goods and services. We obtain these services only when there is a legitimate need for them.

WE DO NOT ACCEPT ANY FORM OF COMPENSATION THAT IS DESIGNED TO INFLUENCE THE SELECTION PROCESS.

Referral of Patients and Members

We do not pay or offer to pay anyone — colleagues, physicians or other persons or entities — for the referral of patients or members.

Similarly, we do not accept payments for referrals we make. When NSLIJ discharges patients and refers them to other providers, we ensure that the referrals are based on the patient’s documented need for the referred service and the ability of the referral provider to meet that need.

Our patient and member’s freedom to choose a service provider must be honored at all times. Financial relationships with providers with whom NSLIJ has a referral relationship are reviewed to ensure compliance with the relevant laws.

Gifts and Interactions with Industry

NSLIJ does not solicit, accept, make or offer to make any payment, or accept or provide any other thing of value to another person or company with the understanding or intention that such payment is to be used for an unlawful or improper purpose. NSLIJ does not offer or give gifts of any kind to government officials.

All gifts from health care vendors, regardless of value or size, are strictly prohibited.

Recent scientific evidence also suggests that certain business practices of pharmaceutical, medical device and similar companies can negatively influence physician decisions and the educational and training experience of students and trainees. As a teaching resource to medical students and trainees, NSLIJ prohibits gifts, improper meals, and other forms of compensation by industry representatives.

Q&A

Q: One of our vendors wants to attend a community information session being hosted by NSLIJ and provide inexpensive trinkets to the people attending the session. Is this permitted under our Gifts policy?

A: No. We cannot accept any gifts from vendors and we do not allow vendors to provide trinkets to anyone in our facilities.

KEY RELATED POLICIES:

• NSLIJ Policy #800.04, “Gifts and Interactions with Industry Policy”
• NSLIJ Policy #800.10, “Business Courtesies to Potential Referral Sources”
• NSLIJ Policy #GR078, “Review of External Consulting Agreements with Industry”
Our Commitment to Our Colleagues

Conflicts of Interest
We have a duty to avoid conflicts of interest and a duty of loyalty to NSLIJ. Our business conduct must always put NSLIJ’s interests ahead of our personal interests.

WE ARE OBLIGATED TO AVOID CONDUCT THAT COULD CREATE A CONFLICT OF INTEREST OR EVEN THE APPEARANCE OF ONE.

• We do not use our positions or confidential information obtained in the course of our work for personal gain.
• We make sure that any outside jobs or positions do not conflict with our work at NSLIJ.
• We disclose to our managers any potential conflict of interest.

Examples of potential conflicts of interest include:
- Acting as a director, partner, consultant or employee of a firm that provides services, supplies or equipment to NSLIJ or is a competitor of NSLIJ
- Having a material financial interest (or a family member having a financial interest) in a firm that is either a competitor of, or a vendor (or potential vendor) to NSLIJ
- Purchasing or leasing real estate that may increase in value based on knowledge that NSLIJ may have an interest in the property
- Hiring subordinates or NSLIJ vendors to perform personal work for yourself or your family without appropriate administrative approval
- Having your research funded by a company or evaluating a product owned, manufactured, or distributed by a company in which you (or a family member) have a material ownership interest or from which you (or a family member) have received significant compensation

Certain members of the NSLIJ community must file annual Conflict of Interest Disclosure Forms. You will be notified if you are required to do so.

RELATED POLICIES:
• NSLIJ Policy #800.03, “Conflicts of Interest and Recusal”
• NSLIJ Policy #GR065, “Review and Management of Financial Conflicts of Interest in Research”

Confidentiality of Business Data
In addition to patient information, other information created by NSLIJ in the conduct of business, such as staff data, financial data, development plans, proprietary research data, marketing strategies or information about pending or contemplated business deals, is confidential information that belongs to NSLIJ. All data relating to employees, including data generated when employees are patients at NSLIJ facilities, is strictly confidential.

WE ALWAYS KEEP NSLIJ BUSINESS INFORMATION CONFIDENTIAL AND DO NOT USE IT AS A BASIS FOR PERSONAL GAIN.

When you receive confidential information in the course of performing your job duties and responsibilities you must not use it for your own or your family’s benefit and you may not disclose it to others for their personal use.

KEY RELATED POLICIES:
• NSLIJ Policy #GR017, “Intellectual Property”
• NSLIJ Policy #GR021, “Research Data Ownership”

Substance Abuse and Impairment in the Workplace
NSLIJ works diligently to maintain an alcohol-free and drug-free environment at our facilities.

WE ARE EXPECTED TO PERFORM OUR JOB DUTIES AND RESPONSIBILITIES IN A PROFESSIONAL MANNER FREE FROM THE INFLUENCE OF ALCOHOL, DRUGS OR OTHER SUBSTANCES WHICH MAY IMPAIR OUR JOB PERFORMANCE OR JUDGMENT.

If we suspect that you are under the influence of drugs or alcohol, you will be required to submit to appropriate drug or alcohol testing. If you are found to be performing any activity for NSLIJ while impaired by or under the influence of alcohol or illegal drugs you will be subject to disciplinary action up to and including termination of your employment.
Controlled Substances
Pharmaceutical drugs may be handled only by properly authorized individuals who do so as a part of their job duties and responsibilities. You may not under any circumstances divert pharmaceuticals for personal use or sale. You are expected to protect the integrity of NSLIJ by safeguarding the drugs entrusted to you.

If you become aware of any potential lapses in security, or any actual violation of any law, policy or regulation relating to drugs, you are required to immediately inform your supervisor or the Office of Corporate Compliance.

Non-Discrimination and Equal Employment Opportunity
NSLIJ promotes diversity in its workforce at all levels of our organization. We are committed to providing a work environment where everyone is treated with respect, dignity and fairness. We are an equal opportunity employer and do not discriminate on the basis of race, color, creed, religion, gender, national origin, actual or perceived sexual orientation, veteran status, marital status, age or disability.

We celebrate cultural and other differences because they contribute to the strength of NSLIJ.

We comply with all laws, regulations and policies relating to equal employment opportunity in hiring, reductions in force, transfers, terminations, evaluations, recruiting, compensation, promotions and discipline. We make reasonable accommodations to the known physical and mental limitations of qualified individuals with disabilities.

Harassment
NSLIJ strives to provide a workplace that is free from harassment and disruptive behavior. Degrading jokes, slurs, intimidation or other harassing conduct are not acceptable at NSLIJ.

We do not tolerate harassment of any kind especially harassment by anyone based on diverse characteristics or the cultural backgrounds of those who work with us.

Sexual harassment can be particularly harmful to the work environment and is prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with your employment. Verbal and physical harassment or abuse and any other behavior that creates an intimidating, hostile or offensive work environment have no place at NSLIJ. If you engage in this conduct, you will be subject to discipline.

If you observe or experience any form of harassment or violence, you must report it to your supervisor, the Human Resources Department, a member of management, the Office of Corporate Compliance or the Help-Line at (800) 894-3226 or by visiting www.northshore-lij.ethicspoint.com online.

Leadership and Professionalism
NSLIJ is committed to the highest standards of excellence in the practice of Medicine and strongly believes that collaboration, communication and collegiality are essential for the provision of safe and competent patient and member care.

All individuals associated with NSLIJ must treat others with respect, courtesy and dignity and must conduct themselves in an appropriate, professional and cooperative manner.

Appropriate professional and cooperative behavior means any reasonable conduct intended to advocate for patients, to recommend improvement in patient care and to participate in the operations, leadership or activities of the staff, including the Medical Staff. Behaviors that undermine a culture of safety include, but are not limited to:

- the use of profanity in the workplace
- the refusal to speak or respond to others
- inappropriate physical contact
- sexual, religious, racial or other unlawful harassment
- throwing objects
- destruction of NSLIJ property

Breaches of the Code of Ethical Conduct by any staff member affiliated with or employed by NSLIJ will be addressed in accordance with our policies. Breaches by practitioners credentialed by a medical board, physician trainees and medical students will be addressed by the procedures provided for in the bylaws, rules and regulations of the Medical Staff and the relevant NSLIJ policies. Issues relating to non-credentialed employees will be addressed by the procedures set forth in the Employee Conduct Policy.
Anyone who observes or is subjected to inappropriate conduct by any staff member can notify their supervisor, Human Resources, the Office of Corporate Compliance, the HelpLine at (800) 894-3226 or online at www.northshorelij.ethicspoint.com, the relevant Medical Director and/or the Nurse Executive for the facility. Employees who make such reports in good faith cannot be retaliated against for making the report.

RELATED POLICIES:
• NSLIJ Policy #100.76, “Professional Behavior”
• NSLIJ Human Resources Policy Part V, Section 3, “Employee Conduct in the Workplace/Progressive Discipline”

Health and Safety
NSLIJ is committed to providing a workplace that is safe, healthy, smoke-free and in compliance with all applicable laws and regulations.

It is important that you immediately advise your supervisor of any workplace injury or any circumstance presenting a danger of injury so that timely corrective action can be taken to resolve the problem.

Environmental Protection
We are to dispose of all waste and other materials and store all chemicals and substances in accordance with applicable laws and regulations. It is important to file all necessary environmental reports accurately and promptly and to cooperate fully with all governmental authorities in the event of an environmental incident. NSLIJ is proud that we have received a number of awards for the green initiatives we have undertaken, including the 2012 “Partner for Change” award from Practice Greenhealth for reducing our waste output.

Political Contributions
We do not use NSLIJ revenues directly or indirectly for political activities or in support of political campaigns. We do not reimburse personal expenses related to any political activities including money spent in support of any political candidate. You may not solicit political contributions from your colleagues in NSLIJ facilities. We do not take positions on political elections or campaigns.

Use of NSLIJ Resources
Each of us is responsible for preserving NSLIJ’s assets including time, material, supplies, equipment and information. All communications systems including, but not limited to, telephones, computers, electronic mail, Intranet, Internet access and voice mail are the property of NSLIJ and are to be used primarily for business purposes in accordance with our policies.

YOU HAVE NO RIGHT TO PRIVACY WITH RESPECT TO ANYTHING YOU CREATE, STORE, SEND OR RECEIVE ON NSLIJ COMPUTER AND TELEPHONIC SYSTEMS. NSLIJ RESERVES THE RIGHT TO MONITOR AND/OR ACCESS ALL COMMUNICATIONS USAGE AND CONTACT.

RELATED POLICY:
• NSLIJ Policy #900.00, “Computer Use Policy”

Intellectual Property
NSLIJ is committed to adhering to all applicable intellectual property laws. We will respect the intellectual property and copyright laws regarding books, trade journals, and other applicable resources. All software used in connection with business must be properly licensed and used in accordance with that license.

RELATED POLICY:
• NSLIJ Policy #GR017, “Intellectual Property”
Screening of Excluded Individuals and Entities

NSLIJ will not knowingly employ, appoint, elect, contract or bill for any individual or entity that has been listed as debarred, excluded or is otherwise ineligible for participation in federal or state health care programs. We routinely search the lists of excluded and ineligible persons including the U.S. Department of Health and Human Services, Office of Inspector General, the General Services Administration and the New York State Department of Health’s exclusion lists.

YOU ARE REQUIRED TO REPORT TO US IF YOU BECOME EXCLUDED, DEBARRED OR INELIGIBLE TO PARTICIPATE IN FEDERAL OR STATE HEALTH CARE PROGRAMS OR HAVE BEEN CONVICTED OF A CRIMINAL OFFENSE RELATED TO THE PROVISION OF HEALTH CARE ITEMS OR SERVICES.

Media Relations

All requests from reporters or the general public for information should be referred to the Public Relations Department at (516) 465-2600. Employees should never release information without the permission of the Public Relations Department.

Responsible Use of Social Media

Protected health information, employee health information and confidential business information (such as NSLIJ business plans) must not be posted on Facebook, Twitter or any other social media site, unless specific advance written permission is obtained from the Office of Public Relations.

THINK BEFORE YOU ACT AND PROTECT PATIENT AND MEMBER PRIVACY.

RELATED POLICY:
• NSLIJ Human Resources Policy Pt. XIII, Section 11, “Social Media Acceptable Use”

Compliance Resources

The Office of Corporate Compliance

The Office of Corporate Compliance is located at 200 Community Drive, Great Neck, NY. Office hours are 9 am to 5 pm, Monday through Friday. Walk-ins are welcome or you can call to make an appointment. The office can be contacted at (516) 465-8097 or by fax at (516) 465-8996 during regular working hours. As listed below, our Compliance Directors are located within their assigned facilities.

Corporate Compliance Office:
Greg Radinsky…………………………………………………….....GRadinsk@nshs.edu
Vice President & Chief Corporate Compliance Officer
(516) 465-8327
Brenda Tirsun………………………………………………….......... BDweck@nshs.edu
Coordinator, Compliance
(516) 465-3274
Elizabeth Barone…………………………………………………...... EBarone@nshs.edu
Coordinator, Compliance
(516) 465-1877

Compliance Audit, Glen Cove and The Long Island Home:
Melissa McCarthy.................. ………………………….…………MAlexand@nshs.edu
AVP, Compliance Audits & Facilities
(516) 465-8081
Debbie Bohr.........………………………………………………….....DMeade@nshs.edu
Manager, Compliance Auditing
(516) 465-3105
Stephen Holloway…………………………………………………..Sholloway@nshs.edu
Senior Coding Auditor
(516) 574-3160

HIPAA Privacy and Security

William Stewart………………………………………………........Wstewart2@nshs.edu
AVP, Corporate Privacy Officer
(516) 465-1883
Debbie Wright………………………………………........….......... DWright3@nshs.edu
HIS/HIPAA Security Program Manager
(516) 465-8858
AnnaMarie Amato………………………………………........…..........Aamato@nshs.edu
Coordinator, HIPAA
(516) 465-8844
<table>
<thead>
<tr>
<th><strong>Compliance Directors &amp; Privacy Officers</strong></th>
<th><strong>North Shore-LIJ CareConnect:</strong></th>
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<tbody>
<tr>
<td>North Shore University Hospital, Forest Hills, Plainview, Syosset Hospitals &amp; North Shore-LIJ Medical Group:</td>
<td>Erin Murphy .................................................. <a href="mailto:EMurphy2@nslijcc.com">EMurphy2@nslijcc.com</a></td>
</tr>
</tbody>
</table>
| Jennifer Fromkin .................................. JFromkin@nhsns.edu | Compliance Officer  
(516) 465-1835 |
| Compliance Director & Privacy Officer       | Mary Chaber ........................................... MChaber@nslijcc.com |
| Southside Hospital & North Shore-LIJ Medical Group: | Privacy Officer and Deputy Compliance Officer  
(516) 405-7514 |
| Georgie Forker .................................... GMacmull@nhsns.edu |  |
| Compliance Director & Privacy Officer       |  |
| (631) 968-3205 |  |
| Ancillary Facilities, Lenox Hill & North Shore-LIJ Medical Group: |  |
| Louis DiGiovanni .................................. LDiGiovann@nhsns.edu |  |
| Compliance Director & Privacy Officer       |  |
| (516) 465-3224 |  |
| LIJ Medical Center, The Zucker Hillside Hospital, Steven and Alexandra Cohen Children's Medical Center & North Shore-LIJ Medical Group: |  |
| Janice Stewart .................................... JStewart2@nhsns.edu |  |
| Compliance Director & Privacy Officer       |  |
| (718) 470-4311 |  |
| North Shore-LIJ Medical Group:             |  |
| Eric Sandhusen .................................. ESandhusen@nhsns.edu |  |
| Compliance Director & Privacy Officer       |  |
| (516) 465-3007 |  |
| Franklin Hospital, Regional Care Recovery & North Shore-LIJ Medical Group: |  |
| Kimberly White ................................... Kwhite6@nhsns.edu |  |
| Compliance Director & Privacy Officer       |  |
| (516) 465-1889 |  |
| Corporate Services & North Shore-LIJ Medical Group: |  |
| Derek Rapisarda ................................ Drapisarda@nhsns.edu |  |
| Compliance Director & Privacy Officer       |  |
| (516) 465-3089 |  |
| Huntington Hospital & North Shore-LIJ Medical Group: |  |
| Donna Angiulo .................................. DAngiulo@nhsns.edu |  |
| Privacy Officer and Compliance Coordinator  |  |
| (631) 351-4171 |  |
| North Shore-LIJ CareConnect: |  |
| Erin Murphy .................................................. EMurphy2@nslijcc.com |  |
| Compliance Officer  
(516) 465-1835 |  |
| Mary Chaber ........................................... MChaber@nslijcc.com |  |
| Privacy Officer and Deputy Compliance Officer  
(516) 405-7514 |  |
| Staten Island University Hospital:          |  |
| Regina Bergren .................................... Rbergren@nhsns.edu |  |
| Deputy Compliance Officer  
(718) 226-4572 |  |
| Michael Scognamiglio ................................ Mscognamiglio@nhsns.edu |  |
| Associate Compliance Officer  
(718) 226-4630 |  |
| Robert Abramson .................................. Rabramson1@nhsns.edu |  |
| Compliance Audit Manager  
(718) 226-5029 |  |
| Elaine Burke ...................................... Eburke4@nhsns.edu |  |
| Procurement Services Associate  
(718) 226-1919 |  |
| Michele Bonomo ................................... Mbonomo1@nhsns.edu |  |
| Compliance Specialist  
(718) 226-4859 |  |
The Compliance HelpLine
The Compliance HelpLine is available 24 hours a day, seven days a week. Compliance HelpLine callers may remain anonymous and those who choose to give their name will have their identities protected to the extent allowed by law. The Compliance HelpLine has multi-lingual operators who can take reports from individuals whose first language is not English. The Compliance HelpLine can be reached by calling (800) 894-3226 or by visiting www.northshorelij.ethicspoint.com online.

The Office of Research Compliance
The Office of Research Compliance (ORC) is responsible for compliance-related activities directly related to the conduct of clinical research and research grant management. The ORC is located at The Feinstein Institute for Medical Research, 350 Community Drive, Manhasset, New York 11030. Office hours are 9 am to 5 pm, Monday through Friday. Walk-ins are welcome or you can call (516) 562-2019 to make an appointment during regular working hours.

The ORC staff members are:
• Emmelyn Kim, Director, Research Compliance, ekim@nshs.edu
• Evelyn Haung, Manager, Research Compliance, ehaung2@nshs.edu
• Leah Schuchter, Manager, Research Compliance, lshuchter@nshs.edu
• Jeffrey Revello, Manager, Research Compliance, jrevello@nshs.edu
• Michelle Aparicio, Manager, Research Compliance, maparici@nshs.edu

The Office of Legal Affairs
The on-call attorney in the Office of Legal Affairs can be reached 24/7 by calling (516) 465-8090, 9am – 5pm (516) 465-7979, 5pm – 9am

Compliance Publications
All publications listed below are available on the Corporate Compliance web pages on HealthPort. Click on “Policies and Forms.”
• Conflict of Interest Brochure
• FAQs for Conflict of Interest and Recusal
• FAQs for Gifts and Interactions with Industry
• Gifts and Interactions with Industry Brochure for Employees
• Gifts and Interactions with Industry Brochure for Vendors

Acknowledgement
NSLIJ requires you to sign an acknowledgement confirming that you have received and read the Code of Conduct, understand its contents and agree to abide by the spirit and intent of the Code.

Questions regarding the Code should be directed to your supervisor or your manager, the Compliance Director assigned to your facility, or the Chief Corporate Compliance Officer.

Detachable Wallet Card

Corporate Compliance Program
• Adhere to the Code of Ethical Conduct
• Treat patients, members and staff with dignity and respect
• Obey applicable laws, rules and regulations
• Behave honestly
• Do not use confidential information for personal gain
• Keep accurate and timely records
• Maintain all patient and member information as confidential
• Ensure a safe and healthy work environment
• Avoid personal conflicts of interest
• When in doubt about a situation, ask before acting.