

Code of Ethics



Honesty, Integrity,
Doing the Right Thing



55 Fogg Road
South Weymouth
Massachusetts
02190-2455
(781) 624-8000
southshorehealth.org



Dear Colleagues:

South Shore Health System aspires to be our community's trusted choice for quality health care services. One of the ways we build that trust is by conducting ourselves with integrity and the highest ethical standards.

Trust is earned through our actions, not simply our good intentions. Our Code of Ethics has been developed to assist all of us in "doing the right thing" in our interactions with others. It specifies the standards to which we hold ourselves accountable.

All those associated with our Health System are expected to read, understand and comply with our Code. It provides helpful guidance about how to accomplish our work in an ethical and legal manner. It also explains the obligation we each have to speak up about any actions, situations or conditions that may violate our Code or the law. Both our Code and the law provide protection for individuals who report suspected wrongdoing in good faith.

Our Code is not intended to be a comprehensive guide to all of South Shore Health System's policies or responsibilities under the law. If you have any questions, please contact your leader and/or our Compliance Department at (781) 624-8828 or via email to compliance@southshorehealth.org.

South Shore Health System's reputation as an ethical organization is one of our most valuable assets.

If Your Concern Relates to...	You May Contact...
Quality: You want to report a quality concern	Call or email Donna Chase, Director Accreditation and Clinical Professional Development: ♦ Ext. 8350 or (617) 624-8350 ♦ DChase@southshorehealth.org
For a quality concern, you may also contact: The Joint Commission, Office of Quality Monitoring One Renaissance Boulevard Oakbrook Terrace, IL 60181 1-800-994-6610	
Risk Prevention: You want to report a patient safety/risk management issue	Call or e-mail Karen Baxter, Director of Risk Management: ♦ Ext. 8432 or (617) 624-8432 ♦ KBaxter@southshorehealth.org
Safety: You want to report a spill or other release of hazardous material	Call: ♦ Security and Public Safety at (781) 624-8288 or ♦ The Emergency Line at (781) 624-7777
Sexual Harassment: You want to report a sexual harassment complaint	Call or email Karen Vinciguerra, Director of Human Resources: ♦ Ext. 8703 or (617) 624-8703 ♦ KVinciguerra@southshorehealth.org
For a sexual harassment complaint, you may also contact the following external entities:	
US EEOC JFK Federal Building, Room 475 Boston, MA 02203 (617) 565-3200	The Mass. Commission Against Discrimination One Ashburton Place, Room 601 Boston, MA 02108 (617) 727-3990

Additional Resources

If you have any workplace issues — or have suggestions for making improvements at South Shore Health System — please be in touch! While we prefer that you reach out to a South Shore Health System contact first, as it allows for more immediate attention, you may contact an external organization without any fear of reprisal. The chart below provides internal and external contact information.

If Your Concern Relates to...	You May Contact...
Compliance: You want to report a known or suspected compliance concern	<ul style="list-style-type: none"> ◆ Call the Compliance Department at ext. 8828 or (781) 624-8828 ◆ Call the Compliance Helpline to make a confidential report at ext. 8688 or (781) 624-8688 at any time (24/7) ◆ Make a report via email to: compliance@southshorehealth.org
HIPAA: You want to report a privacy violation about yourself and/or your dependent regarding your South Shore Health System health plan	Call or email Kim Hayward, Benefits Manager: <ul style="list-style-type: none"> ◆ Ext. 8414 or (617) 624-8414 ◆ KHayward@southshorehealth.org
HIPAA: You want to report a privacy violation	<ul style="list-style-type: none"> ◆ Call the South Shore Health System Privacy Officer at ext. 8828 or (781) 624-8828 ◆ Mail to the Privacy Officer at 55 Fogg Road, Mailbox #82 South Weymouth, MA 02190-2455 ◆ Fax to (781) 624-5140
For a HIPAA violation, you may also contact the Office of Civil Rights, Regional Manager at:	
Government Center JFK Federal Building, Room 1875 Boston, MA 02203-0002	Phone: (617) 565-1340 Fax: (617) 565-3809 TDD: (617) 565-1343

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Definitions

Health System: Refers to the South Shore Health System and any of its affiliates.

Medical Staff: Refers to the organized body of licensed physicians and other healthcare providers who are permitted by law and by South Shore Hospital (through admitting privileges) to provide medical care within the hospital or facilities.

Leader: Refers to all members of SSSH leadership (managers, directors), executive leadership, Board of Directors and leaders of the Medical Staff, including Department chiefs.

Workforce Members: Refers to all employees, volunteers, students, trainees, vendors, contractors, consultants, agents, employed physicians and other health care providers or other persons whose work is conducted at the direction of South Shore Health System (excluding members of the Medical Staff who are not employed by or contracted with South Shore Health System).

Compliance Program: A set of controls, policies and procedures implemented by South Shore Health System and its affiliates to meet the standards set forth by the Office of Inspector General (OIG), federal and state laws/regulations, and/or regulatory agencies.

Introduction

South Shore Health System has developed this Code to provide key information about ethics and compliance situations that could arise while performing your job. We are committed to providing you with the resources you need to understand and comply with these rules.

Your commitment to ethics and compliance is critical to the success of our Health System.

It is everyone's responsibility to become familiar with these requirements. If you are a leader, it is your responsibility to set an example of ethical conduct and to encourage your staff to follow all Health System policies, procedures and rules.

Not every topic described in this Code will apply to you and situations may arise that are not covered here. You may also be subject to additional requirements such as the Medical Staff Bylaws and government rules and regulations. You should contact your leader or the Compliance Office if you have any questions. If there is any difference between the information outlined here and other South Shore Health System policies or procedures, you should comply with this Code and notify the Compliance Office and your leader of the discrepancy.

Any workforce member or employed medical staff who disregards or violates this Code, the Compliance Program or any other applicable policies or procedures is subject to corrective action up to and including termination. The corrective action imposed will be determined on a case by case basis and will depend on the nature, severity and frequency of the violation. Violations of this Code by non-employed medical staff members are subject to review and action under the Medical Staff Bylaws. In addition, South Shore Health System may have an obligation to bring violations to the attention of the appropriate outside authorities.

Compliance Is Everyone's Job

If you become aware of a potential compliance issue, it is your responsibility to do one or more of the following:

- ◆ Notify your leader
- ◆ Call the Compliance Department at ext. 8828 or (781) 624-8828
- ◆ Call the Compliance Helpline to make a confidential report at ext. 8688 or (781) 624-8688 at any time (24/7)
- ◆ Make a report via email to: compliance@southshorehealth.org

Our Mission

South Shore Health System's mission is to benefit the people of our region by promoting good health, and by healing, caring and comforting. Safeguarding the privacy and dignity of our patients is critical to our mission.

Quality Care and Patient Safety

Our Health System is dedicated to assisting patients with financial, social and other needs whenever possible to ensure they receive the right care at the right time. South Shore Health System is monitored by several regulatory agencies, including The Joint Commission and strives to uphold our quality standards, improve our processes and validate our approach with the Commission and other groups who are dedicated to quality care and patient safety. We are also committed to providing the support and resources you need to provide services to our patients.

Accuracy of Reports

South Shore Health System has adopted a Record Retention Policy. (Refer to our Management and Retention of Patient Health Records Policy for more information.)

You must ensure that Health System records accurately reflect our operational, financial and strategic activities. This includes documentation relating to accounting and finance documents, expense accounts, time records, and reimbursement requests. It also applies to any and all clinical and treatment documentation.

Everyone is individually responsible for records within their area of responsibility and for complying with any laws, acts or statutes that govern the particular business area.

Medical Staff Recruitment

The recruitment and retention of medical staff requires special care on the part of both South Shore Health System and its medical staff members. Medical staff recruitment (especially of private practice physicians) has implications under the Anti-Kickback Statute, the Stark Law, and Internal Revenue Service rules governing the tax-exempt status of South Shore Health System and its affiliates.

Each South Shore Health System recruitment package or commitment should be in writing and be consistent with the guidelines established by our legal counsel. New or unique recruitment arrangements should be reviewed and approved in advance and in writing by the South Shore Health System Compliance Office in conjunction with legal counsel.

Government Investigations

South Shore Health System will cooperate in all government investigations by coordinating its responses through the South Shore Health System Compliance Office and legal counsel.

If you learn of, or are contacted about any government investigation pertaining to South Shore Health System or your activities at South Shore Health System (including any contacts or attempted contacts with you at home or in your office), you must contact the Compliance Office immediately. If you are contacted by a representative from any governmental authority or agency, you should first confirm the agent's/investigator's identification and then refer any questions or requests for information to the Compliance Office.

You should never, under any circumstances, destroy, fabricate, or alter any South Shore Health System records, information, or documents in anticipation of a request for such documents from a court or any government agency. When communicating with any government agent or investigator, you should **always tell the truth**.

Closing Thoughts

This Code was developed to guide all of us at South Shore Health System to conduct ourselves with integrity and the highest ethical standards — to do the right thing. Your cooperation is vital to our efforts to be the community's trusted choice for health care services. Please review and understand the policies and requirements we have outlined here. If you have any questions, contact the Compliance Office.

Billing and Coding of Services

Billing for services not documented or provided could be considered a False Claim under federal law and may result in significant financial penalties. The False Claims Act provides “whistleblower protections.” South Shore Health System will not retaliate against anyone for filing a report of a False Claims Act violation in good faith.

All workforce members have an obligation to ensure that the services provided are supported by appropriate documentation and that claims submitted to payers accurately reflect services rendered. Coding and billing rules are complex and may vary by payer. It is critical that staff involved in charging, coding and billing familiarize themselves with internal policies and external requirements and raise potential issues immediately.

You should never charge, code or bill if the service was not provided and/or documented. Any concerns regarding billing, charging and coding should be referred to the Compliance Office. You should also notify the Compliance Office before contacting government payers about issues that are different than routine claims or payments. The Compliance Office will notify the Medical Staff Office of any substantiated concerns or violations by medical staff.

The Commonwealth of Massachusetts has adopted its own False Claims Act, modeled on the federal law. The state law prohibits knowing submissions of false or fraudulent claims for payment of state funds including the submission of claims for payment of health care services to MassHealth or other state programs. Penalties for violating the state False Claims Act include triple damages, monetary penalties for each false claim, and the costs of the government’s investigation or lawsuit. The state False Claims Act also contains whistleblower provisions.

If You See Something

If you believe South Shore Health System is submitting or has submitted improper claims for reimbursement, you should contact the Compliance Office immediately at ext. 8828, (781) 624-8828 or via e-mail to compliance@southshorehealth.org.

Use of Assets and Resources

South Shore Health System’s materials, supplies, facilities and equipment are to be used only for our business purposes. Computers and internet access are also considered a South Shore Health System resource and are monitored.

You may not engage in activities for personal convenience or profit on South Shore Health System time, nor may our resources be used for such purposes. An act by a workforce member or medical staff that involves theft, fraud, embezzlement, misuse or misappropriation of our Health System assets violates this Code.

Misuse Example

An administrator asks her assistant to assemble and print labels for her annual holiday card mailing to friends and family. Use of our Health System resources (staff time and supplies) for a personal matter is not compliant with our standards.

Every workforce member must be committed to meeting patient care needs first and foremost. This means providing necessary care in a safe and timely manner and avoiding unnecessary care. Patients and families should be treated with respect and dignity, with patient and family needs being considered every step of the way.

Who You Should Contact

You should report any concerns you have about patient safety and quality to your leader and/or the Risk Management Department at ext. 8432 or (781) 624-8432.

Confidentiality, Privacy and Safeguarding Protected Data

At South Shore Health System, it is understood that medical information is personal (to that individual) and we are committed to protecting any “protected health information” (PHI) and to complying with the privacy regulations established as part of the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Any information that can identify someone and is related to past, present or future physical or mental health conditions and related health care services is considered PHI. Protected information may include: PHI, ePHI, credit card information, information containing Social Security numbers and any other confidential or proprietary information.

You may only use protected health information without authorization for the following reasons:

- ◆ **Treatment.** You may share PHI with doctors, nurses, technicians, students or other South Shore Health System personnel to provide medical treatment or services.
- ◆ **Payment.** You may use and disclose PHI to an insurance carrier or third party payer to verify coverage and make sure that claims are billed and paid correctly.
- ◆ **South Shore Health System Operations.** PHI may be used for administration, planning and quality assessment purposes, functions which are necessary to run our Health System and ensure that all of our patients receive q y care.

Otherwise, PHI may only be disclosed when patients authorize it or when it is required by law.

There are no exceptions.

How You Can Protect PHI

- ◆ Use the minimum amount of — and only the information you need — to do your job.
- ◆ Only discuss patient information in private — and where others cannot hear your conversation. Take all confidential information with you after faxing, copying or sharing in a meeting.
- ◆ If you find confidential information, notify the South Shore Health System Privacy Officer at ext. 8828 or (781) 624-8828.
- ◆ Make sure confidential information cannot be seen by others on your desk or computer screen.
- ◆ Only leave appointment information on a patient’s home or office answering machine , fax or cell phone (voice or text). Do not mention the specific condition, treatment, health care provider’s name or reason for the appointment.

South Shore Health System colleagues and members of the Medical Staff are permitted to view his/her own medical record. However, you may not access another family member's or any other individual's record without a legitimate business purpose.

Access to PHI can, and will, be monitored. Audits are performed when requested by a patient, on a random basis or if identified as high-risk, such as patients who are also workforce members, high-profile patients (e.g., local athletes or celebrities) and patient cases that may have been in the news.

Confidential and proprietary information may include business information, financial information, marketing information, medical data (e.g., for a study), documents and plans associated with South Shore Health System's business and services, patient-specific information, personnel records, medical records, and salary and payroll information.

Everyone has an obligation to keep confidential and proprietary information safe and not to share it with anyone outside of our Health System unless your role requires that you disclose the information for an authorized business purpose or you are required to disclose the information because of a government investigation.

Who You Should Contact

You should report any concerns you have about privacy to your leader and/or the South Shore Health System Privacy Officer at ext. 8828 or (781) 624-8828.

Protection of Research

South Shore Health System supports human subject research in accordance with all federal regulations and with approval by the Institutional Review Board (IRB). Through research, advances in drug products, methods of treatment and medical devices, we have the potential to improve the lives of people in our community, state and nation.

All workforce members involved in research are responsible for protecting human subjects, maintaining confidentiality, and ensuring each participant is informed and freely consents to participate in the research. Falsification or manipulation of research results is illegal and compromises the integrity of an individual as well as the organization. To the extent research grants and awards are received, funds must be used in accordance with federal laws and contractual requirements.

Government Rules and Regulations

South Shore Health System must comply with many laws and regulations (e.g., Medicare, Medicaid, other state and federal health care programs) and is committed to providing you with the information you need to assist us in these efforts.

Kickbacks and Referrals

The Anti-Kickback Statute and the Stark Law govern South Shore Health System's relationships with referring providers. It is important to understand that arrangements that appear to be "good business" in other businesses or industries could be illegal in health care. We all must comply with the rules that apply to the health care industry.

The Anti-Kickback statute is a criminal law that prohibits the knowing and willful payment of "remuneration" (anything of value) to induce or reward patient referrals or the generation of business involving any item or service payable by the federal health care programs (e.g., drugs, supplies, or health care services for Medicare or Medicaid patients).

The Physician Self-Referral Law, commonly referred to as the Stark Law, prohibits physicians from referring patients to receive "designated health services" payable by Medicare or Medicaid from entities with which the physician or an immediate family member has a financial relationship, unless an exception applies.

Scenarios that may raise concerns under these laws include:

- ◆ Offering or receiving anything of value to convince a patient or a patient's family member to buy an item or service from South Shore Health System
- ◆ Offering anything of value to a physician that encourages a patient to receive care at South Shore Health System
- ◆ Receiving payment for performing specific duties when South Shore Health System does not actually require these duties
- ◆ Not requiring documentation for time spent performing contracted duties
- ◆ Compensation paid for contracted services that is above the fair market value for those services
- ◆ Termination of contractual arrangements with medical staff members who do not refer a certain number of patients to South Shore Health System and
- ◆ Providing money in the form of research grants, consulting agreements, medical director agreements and/or marketing agreements when the money and benefits are paid, even in part, with the intent to induce referrals.

Although there are exceptions to these laws, their interpretation is complex and should be undertaken by a professional who specializes in this area. Every agreement involving compensation or referrals with a medical staff member, advanced practice clinician or a referral source must be reviewed and approved in advance and in writing by the Compliance Office.

Emergency Treatment, Patient Transfers and Discharges (EMTALA)

The care that we provide in our Emergency Department is an integral part of the services we offer. Our Emergency Department is a place where anyone may come for care regardless of his or her ability to pay.

You must comply with the EMTALA (Emergency Medical Treatment and Labor Act) law. This law was established to make sure that patients are not transferred from South Shore Health System to another facility (or vice-versa) unless it is medically necessary or appropriate. Refer to our Patient Transfers and Discharges Policy (EMTALA) for guidance.

Political Contributions

South Shore Health System funds and assets may not be used for political campaign contributions. This prohibition applies to both direct contributions and indirect assistance of candidates (e.g., to Political Action Committees or PACS).

Our Code does not prevent workforce members or medical staff from making personal contributions. However, under no circumstances will you be reimbursed by South Shore Health System for such contributions. You should consult with the Compliance Office before agreeing to participate in a political activity that could involve our Health System.

Compliance Office

South Shore Health System has established a Compliance Office to share information about ethical, legal and regulatory requirements and to ensure we meet Health System standards. The Compliance Office maintains independence from operational responsibilities and has direct access to South Shore Health System's CEO and Board of Directors. The Compliance Office is available as a resource to everyone and is committed to ensuring that all reports of potential misconduct are addressed, including ensuring that necessary corrective actions are implemented.

Reporting Process

South Shore Health System has established several ways to report incidents, situations, or ask questions related to compliance matters.

Everyone has the responsibility to report a non-compliance or suspected non-compliance concern.

Doing nothing is not an option. You may report:

- ♦ **By calling:** Call the Compliance Office directly at ext. **8828** or **(781) 624-8828**.
- ♦ **In person:** Visit the Compliance Office.
- ♦ **In writing:** Send information to the Compliance Office via interoffice mail (mailbox #82), email (compliance@southshorehealth.org) or regular mail, c/o South Shore Health System, Mailbox #82.
- ♦ **Use the Helpline:** Call the Compliance Helpline at ext. **8688** or **(781) 624-8688** at any time (24/7). Calls go to a confidential voice mailbox so there is no audit trail or opportunity for caller identification.

If you prefer to remain anonymous, please understand that the review process may be limited if the information you provide is not specific and we are unable to gather additional information.

The more detail you provide, the more thoroughly we can investigate your concerns. Confidentiality will be maintained to the fullest extent possible; however, as an investigation progresses, continued anonymity may not be possible.

Non-Retaliation

South Shore Health System will not retaliate against anyone for reporting in good faith a violation or suspected violation of applicable law, this Code, our policies or procedures, or a general compliance concern.

Refer to our Retaliation Protection Policy for more information.

Workplace Conduct

South Shore Health System is committed to providing a healthy, safe, and productive workplace. The workplace must be free from discrimination and harassment based on race, religion, color, gender, gender identity, age, national origin, disability, disabled or veteran status, sexual orientation and/or any other status protected by state or federal law.

Safety and Protection of the Environment

Our Health System is committed to practices that promote a safe and healthy physical environment, prevent damage to the environment, reduce or avoid exposure to environmental hazards, enhance human and community resources and conserve natural resources. In addition, we are committed to the safe and responsible handling, storing, transporting, use and disposal of biomedical waste, hazardous materials and other waste products.

You must comply with applicable local, state and federal environmental laws. It is important that you learn and understand what is required for everyone's safety and protection.

Who You Should Contact

You are required to report all spills and releases of hazardous materials immediately to Security and Public Safety at **(781) 624-8288** or the Emergency Line at **(781) 624-7777** so that any necessary corrective actions can be made and appropriate cleanup initiated.

Employee Relations and Equal Opportunity Employment

South Shore Health System has established policies and procedures for hiring, recruitment, retention, transfers, promotion and education. Our Health System values diversity and has no tolerance for discrimination based on race, color, religion, national origin, sex, age, gender identity, disability, sexual orientation, military status or other status protected under law.

We expect everyone to uphold and reinforce these policies and procedures, regardless of your position with our Health System.

Harassment, Drug, Alcohol and Violence

South Shore Health System will not tolerate sexual harassment, comments, or other conduct that creates an intimidating or offensive work or patient care environment. Colleagues, patients, family members and visitors should always feel comfortable. This is particularly important with respect to patient admissions, transfer and discharge operations. Complaints of inappropriate conduct will be reviewed promptly and our Health System will not tolerate threats or acts of retaliation against workforce members or medical staff for reporting such matters. Everyone is expected to fully comply with all applicable federal, state and local laws and regulations relating to health, safety and the environment.

Workforce members who are under the influence of or adversely affected by any drug, controlled substance or alcohol are not permitted to work, enter, or remain on our premises other than to seek medical treatment for these impairments. Such behavior on the part of a workforce member will be addressed according to our Health System policies and Medical Staff Bylaws.

Other types of prohibited conduct include violent behavior, possession of or carrying firearms or other dangerous weapons, threats and the possession, use, distribution or sale of drugs, controlled substances or alcohol. The exceptions to this rule are the possession and use of a prescription medication in accordance with the prescribing practitioner's instructions and the possession, use or distribution of any controlled substances required in the conduct of our business.

South Shore Health System may use any lawful method of inquiry it considers necessary to determine whether any workforce member has engaged in conduct that interferes with or adversely affects our business, including: theft from our Health System or any other person, suspicion of possession of drugs, alcohol, firearms or any other behavior prohibited or restricted by law on our premises. All workforce members are expected to participate in and fully cooperate with South Shore Health System's security efforts and inquiries.

Use of Social Media

South Shore Health System prohibits workforce members and medical staff from using social media while providing care to patients and/or conducting business on behalf of South Shore Health System unless you have been approved by management to use social media for a legitimate business purpose.

You are expected to use good judgment when using social media on personal time and should ensure that any opinions expressed are attributed to you and not to South Shore Health System.

How You Can Comply

To maintain compliance with HIPAA, other laws and our standards, you should **NOT**:

- ◆ Post, blog, tweet or otherwise disclose any information about patients, research subjects or any other confidential information.
- ◆ Use social media to communicate with patients or post photos unless approved by your leader.
- ◆ Post harassing comments related to any colleague or patient.
- ◆ Use your South Shore email address to sign up for social media.

Use of Marketing Materials

Our marketing and public affairs programs are designed to accurately describe South Shore Health System and its medical staff, programs and clinical services.

Medical staff are responsible for providing South Shore Health System with accurate information regarding practices and/or credentials and for reporting any inaccurate statements that may have been made in any such materials, announcements and programs to their leader or the Compliance Office.

All South Shore Health System trademarks, trade names, logos and service marks can be used only with the permission of the Marketing Department. Everyone has a responsibility to ensure that our name is not misused.

If You Have Questions

If you have any questions about our marketing materials or how they can be used, please contact the Marketing Department at (781) 624-4038.

Conflicts of Interest, Gifts and Contributions

South Shore Health System has established policies regarding conflicts of interest, gifts and political contributions.

Conflicts of Interest

The South Shore Health System Compliance Office has rules regarding conflicts of interest. The Office of Research has also developed guidelines for conflicts of interest that apply to research activities, regardless of funding or funding source.

You have a duty to avoid conflicts of interest that may conflict, or appear to conflict, with the mission and business activities of our Health System. This applies not only to your own direct and indirect interests, but also to those of your immediate family members. Workforce members are required to disclose any relationships or activities that conflict, or appear to conflict, with South Shore Health System's interests to the Compliance Office.

If you have questions about whether a relationship poses a potential conflict, you should consult with the Compliance Office. Refer to our Conflicts of Interest Policy for more information.

Members of the executive team, directors, medical staff and other selected committee members are required to sign an acknowledgment and to disclose any conflicts or potential conflicts on an annual basis.

Disclosure Examples

The following situations would need to be disclosed to the Compliance Office:

- ◆ You have an ownership interest in a company that supplies cleaning products to South Shore Health System.
- ◆ You serve as a consultant for a local nursing home.
- ◆ You have a second job that interferes with your responsibilities at South Shore Health System.

Gift Policy

South Shore Health System has a strict no-gift policy.

In some instances, a patient may wish to express gratitude to health care providers who provided care. Cards, candy, flowers or other nominal gifts may only be accepted if offered by the patient or family member. Gifts and other items of value are never to be solicited or accepted from patients or their families, including gift cards and tickets to sporting events, concerts and dinners.

What You Can Do

If someone wants to make a gift, encourage him/her to contact the South Shore Health System Foundation at (781) 624-8600 or via email to foundation@southshorehealth.org.