

Working Together with Integrity

Workforce Code of Conduct



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A Message from Leadership

Dear Colleagues,

Beth Israel Lahey Health (BILH) came together as a system in 2019 to make a difference – for our patients, their families, our workforce and our communities. Underscoring that commitment is our shared purpose statement: *We create healthier communities – one person at a time – through seamless care and ground-breaking science, driven by excellence, innovation and equity.*

Our ability to deliver on our purpose must be built on a foundation of integrity. Every day, each of us is counted on to do the right thing for the people and communities we serve and for each other.

Compliance is everyone's responsibility at BILH. This Workforce Code of Conduct (the Code) applies to each and every one of us and serves as our guide for navigating common issues, whether you work in clinical care, research, education or an administrative role. While our Code of Conduct cannot possibly cover every issue we might encounter, it provides a framework for approaching many common situations and works in conjunction with human resources, clinical, and other policies.

This Code of Conduct also includes resources for questions you may have and important information about how to report concerns, including anonymously. We have a shared responsibility to ask questions and report any concerns that we have, secure in the knowledge that the organization does not tolerate any form of retaliation against those who raise such concerns.

We join with BILH's Chief Compliance Officer Lori Dutcher, our leadership team and compliance officers across our organization in asking that you review this Code of Conduct carefully and discuss it with your supervisor and your colleagues.

Thank you for everything you do to ensure that we live up to the trust that has been placed in each of us.

Kevin Tabb, MD

President and Chief Executive Officer, Beth Israel Lahey Health

Beth Roberts, MBA

President, BILH Performance Network



Kevin Tabb, MD



Beth Roberts, MBA

“Thank you for everything you do to ensure that we live up to the trust that has been placed in each of us.”

BILH Purpose and Shared Values

BILH Purpose Statement: We create healthier communities – one person at a time – through seamless care and ground-breaking science, driven by excellence, innovation and equity.



BILH Shared Values: WE CARE

Wellbeing

We provide a health-focused environment and support a healthy work-life balance.

Empathy

We value and work to understand each person's feelings, needs and perspectives.

Collaboration

We work together to achieve extraordinary results.

Accountability

We hold ourselves and each other to behaviors necessary to achieve our collective goals.

Respect

We value and treat all members of our community with dignity and inclusiveness.

Equity

Everyone has the opportunity to attain their full potential in our workplace and through the care we provide.

Our Culture of Integrity: How We Live Our Code



We are all responsible for compliance at BILH Performance Network (BILHPN). This Code helps define those responsibilities and applies to every member of our workforce: employees, clinicians, students, volunteers, and contracted staff. We all work together to create an effective compliance and ethics program. We also expect vendors and others who provide clinical care or conduct business with our organization to follow applicable rules. In addition to following the Code, each member of the BILHPN community should follow all policies, standards, regulations and laws that apply to your role.

Managers and clinical leaders have a special role. As the ones to whom many will look for answers about ethical behavior, managers and leaders set the tone. Leaders are accountable for reinforcing our standards and should keep an open door and an open mind.

All members of leadership – executives, directors, managers, supervisors and clinical leaders – should be familiar with the content of this Code, including all applicable policies. Leaders are responsible for reaching out to resources such as senior leaders of their departments or units, Integrity and Compliance, Quality/Risk, or Human Resources when appropriate. Managers and leaders are responsible for communicating to their staff the importance of compliance and ethical decision making, including the fact that retaliation is against BILHPN policies.



HOW WE DO IT

- We have established this Code and other policies based on best practices, safe and quality patient care, and the laws and regulations that apply to us.
- We ask all members of our workforce to maintain the qualifications and requirements for their profession.
- We understand our responsibility to speak up, ask questions and report concerns.
- We realize that ensuring integrity and compliance is everyone's job.

Ethical Decision Making

When you are faced with a work decision, ask yourself:

Does my decision align with BILH values?



Does my decision follow this Code, our policies and applicable law?



Does my decision advance the goals of BILHPN and enhance our reputation for doing the right thing?



Is my decision good for our patients, BILHPN and my co-workers?



Would I be comfortable if my decision were made public?



If you answer “No” or you’re not sure for any of these questions, seek guidance from your manager or leader, your Compliance and Privacy Officer, the Integrity and Compliance Department at either 617-278-8300 (main line) or via email at bilhintegrityandcompliance@bilh.org, the BILH Speak Up Hotline at 888-753-6533 or BILH.ethicspoint.com, or Human Resources.

We Speak Up

The most important thing any of us can do is ask questions and report our concerns. Speaking up when we are uncertain about a situation or when we believe misconduct has occurred is crucial to our mutual success.

Speak up. Be accountable. Ask questions and report any concerns you have.

Reach out. Managers and clinical leaders are your first resource, but you can also call Integrity and Compliance or Human Resources or report through the Speak Up Hotline. There, you have the option of reporting anonymously, meaning you don't have to provide your name. If you choose to report anonymously, be sure to provide enough details so we can properly respond to your concern.

It's our job. Don't assume someone else will report. It is everyone's place to ask questions; we all have a duty to speak up.

Have confidence. Retaliation is against our policies, and those policies apply to anyone who reports misconduct in good faith. Any incidents of retaliation should be reported to Integrity and Compliance or Human Resources.

We have several ways we can speak up at BILHPN. Our first resource is our managers and leaders. Approaching those closest to the issue is often the best and most efficient way to handle questions and concerns. You can also reach out to the following:

- BILHPN's Integrity and Compliance staff. If you are unsure who to contact, contact the Integrity and Compliance main line at 617-278-8300 or via email at bilhintegrityandcompliance@bilh.org
- Human Resources
- BILH Speak Up Hotline: 888-753-6533 or BILH.ethicspoint.com



IN PRACTICE



You notice an inventory issue in your department. It appears that some equipment cannot be accounted for. When you report this to your manager, she tells you, "Don't worry about it." You consider going to Integrity and Compliance with your concerns, but you're worried that your manager might get upset with you. What should you do?

This is a circumstance where we are counting on you to speak up. We have several resources that can help you. If you are uncomfortable contacting Integrity and Compliance or Human Resources, you can always use our Speak Up Hotline.

How We Respond

We investigate. We take compliance reports seriously and are committed to resolving concerns. When conducting investigations, we enforce our policies against retaliation for those who make good-faith reports and make reasonable efforts to protect reporters' identities and maintain confidentiality.

We cooperate. It is important for those who speak up to cooperate with any investigation. We cannot resolve concerns and issues unless we are able to fully investigate them.

Issue resolution. After each investigation, we will take disciplinary action against those involved as appropriate.



How We Treat Each Other



Respect, Inclusion and Belonging

We celebrate diversity. Our diverse lived experiences bring valuable perspectives to our team. We support an inclusive and positive work environment for all employees and believe that everyone should have the opportunity to attain their full potential, belonging and best authentic self at work. Discrimination based on protected characteristics such as race, color, sex, sexual orientation, gender, gender identity or expression, age, religion, creed, national origin, disability, military service, or any other legally protected trait or category or socioeconomic status is against our policies. We take seriously our policies that prohibit discrimination and harassment and will take disciplinary action against those employees found to have violated such policies.

We don't allow discrimination or harassment. Behavior that creates an intimidating, hostile or offensive workplace has no place at BILHPN and is expressly against our policies. Those policies prohibit offensive remarks, jokes or slurs related to protected characteristics such as those described above.



HOW WE DO IT

- We seek to build diverse teams without bias.
- We create a space where everyone can bring their best authentic self to work each day.
- We actively listen and work to implement effective venues for discussions around diversity and inclusion.

Safe Workplace

We operate safely. Our wellbeing is key to our ability to serve our patients. Maintaining a safe work environment requires us to follow all laws, regulations and BILHPN policies related to safety. This includes all fire, chemical, biological, and radiation safety rules and procedures.

We do not work impaired. Substance use disorders are serious, and we must not work while impaired by alcohol, drugs or any other substance that affects our ability to perform our jobs. Substance use is against our policies, and those found to have violated those policies will be subject to disciplinary action. If you are experiencing issues with substance use disorder or believe another staff member is impaired, you should report your concern to a manager, leader or Human Resources.

We handle controlled substances with care. All who are authorized to handle controlled substances must make sure that they carefully follow our policies and procedures for the substances' use and distribution. Report any concerns about theft, loss or unauthorized use immediately to your manager or leader, to Integrity and Compliance, and to Public Safety/Security staff, or call the BILH Speak Up Hotline.

We raise issues. If you are injured while at work at our facilities or are aware of any condition or practice that you believe to be unsafe, speak up. Follow BILHPN's policies and procedures on alerting the appropriate safety official, Integrity and Compliance, Human Resources, or the safety reporting system to make sure you report an issue and get the support you need.



IN PRACTICE



Your manager contacts you about coming in to cover a shift you were not expecting to work. Although you've been out to dinner and had several glasses of wine, you think you might be able to cover the shift. What should you do?

You should inform your manager that you may be impaired and should not report for the shift. We should not take any chances when we think we might be impaired or believe other staff may be impaired. We should not potentially compromise our safety and that of our patients and co-workers.

Workforce Privacy

We protect private personal data. During normal business operations, BILHPN may collect employee personal data such as identification information, financial information, health information, employment history and other data. We are accountable for securing employee personal data and should use it only for necessary operational activities. Anyone with access to employee data must follow all relevant policies and procedures when accessing, collecting, using, transmitting, storing and destroying this data. Sharing employee data with anyone outside the organization without proper authorization is against our policies.



How We Respect and Serve Our Patients and Our Communities



Quality Patient Care

Patient care is at the center of what we do. BILHPN promotes excellence and innovation in patient care, and we all play a role in maintaining that focus.

We inform our patients. We make sure our patients are well informed. We obtain necessary consent for treatment or consent for participation in any research. We make sure that we properly inform patients about their treatment and care and provide them with relevant information regarding our policies and procedures.



HOW WE DO IT

- We recognize the dignity of each of our patients and treat them with respect.
- We are honest, transparent and empathetic with our patients.
- We respond to patients' concerns and answer their questions.

Safe Patient Environment

A safe and secure environment for patients and staff. We are committed to creating and maintaining an environment for patients and staff that is safe, focused on their wellbeing and conducive to preventing injuries. We follow patient safety policies and procedures and make sure we use proper equipment. We report patient and staff safety events or near-miss events to our safety reporting system.

Patient Privacy

Protect patient information. Patients trust us with their protected health information (PHI) and their personal information. We must protect this information and use it only when necessary for clinical care or other work tasks. This includes viewing, sharing and disposing of confidential information properly according to policies. When it comes to PHI and personal information, we don't guess; we are accountable for following our policies and procedures. If we are not sure or we have a question, we ask a manager, leader, or Integrity and Compliance. Only those authorized should view PHI and personal information and only for the reasons outlined in the appropriate policies. We do not view the medical information of family members, friends, colleagues, celebrity patients or former patients unless we are on their care team. We do not release patient information to colleagues or any third parties, including vendors, except in strict accordance with our policies and procedures, and only if we are authorized to do so.

Follow our policies and procedures. We carefully follow our policies and procedures regarding the handling of PHI and personal information. This includes information we share via written or verbal communication or through computers and encrypted mobile devices (laptops, tablets, thumb drives, cell phones, etc.). We also ask questions and report any concerns that we might have regarding any possible breach or misuse of patient information.



IN PRACTICE



You observe a fellow staff member failing to follow our procedures for disposing of hazardous biowaste. When you mention to him that you have noticed, he tells you that it simply takes too long to follow all the steps and that he cannot complete his duties if he were to follow the entire process. You feel like he does a good job otherwise, and you don't want to get him in trouble. What should you do?

Our safety procedures are in place for specific reasons, so you should speak up if you observe others failing to follow them. You should bring this to your manager's attention.



Community Involvement

We are part of our community. We are committed to our patients and our community. BILHPN participates directly and through other organizations in programs designed to promote and improve the quality of life and access to opportunities in our community. Additionally, BILHPN encourages all employees to support their communities through charitable activities and involvement with other local organizations. However, unless you are specifically authorized to act as a representative of BILHPN or BILH, you should always make it clear that you are acting on your own behalf and not the organization.



HOW WE DO IT

- We do give back to our community and get involved.
- We don't suggest we represent BILHPN or BILH or commit any of the organization's resources to any cause or organization without proper authorization.

Political Participation

Be clear about politics. BILHPN encourages staff to be involved in political causes they care about. It's important, however, that we are always very clear that our personal political beliefs or support of political causes is just that – ours, not BILHPN's or BILH's. BILHPN does not support individual political candidates or causes, nor does the organization make political contributions.

On your own time. We do not use BILHPN or BILH funds, assets or equipment to support political causes or candidates, nor do we engage in politics during work hours. We respect others' opinions.

IN PRACTICE



As part of your plan to run for the local school board, you've designed a simple flyer providing contact info and your stance on some local issues. Is it OK to print out a few copies on the organization's copy machine when no one else is using it? And is it OK to hand out a few to staff members you know live in the school district?

No. You should do neither of these things. While it's admirable that you want to serve, you must pursue that on your own time using your own resources. Additionally, you are prohibited from campaigning or engaging in political activity, such as handing out political materials, while you are on the job.



Sustainability and the Environment

We respect our shared environment. We act responsibly and sustainably and look for ways to preserve and protect our shared environment. We seek to reduce our impact on the environment by reusing and recycling materials and encouraging our team to engage in sustainability efforts.

We speak up. If you observe any issue or if you have an idea on how to better protect our resources or reduce waste, contact your manager or leader.



How We Keep Our Organization Strong

Conflicts of Interest

We avoid conflicts of interest. Conflicts of interest occur when personal interests or activities influence, or appear to influence, our ability to act in the best interest of BILHPN. When acting in our role at BILHPN, it is important to carefully manage situations where our personal interests could conflict or reasonably appear to conflict with the best interests of BILHPN or our patients.

We choose products and services fairly. When we choose medications, instruments, medical devices, equipment, and other supplies and services necessary for our business, we do so based on their value and fitness for purpose and not on personal interests.

We maintain our focus on BILHPN. We are aware of when our activities outside the organization have the potential to conflict with our responsibilities at BILHPN. We are accountable for our actions and follow policies on conflicts, including the policies of our partner academic institutions. Whenever we have a question or concern about conflicts, we talk with our manager or leader or with Integrity and Compliance. That includes situations when we need to disclose outside activities.



HOW WE DO IT

- We make fair business decisions based on what is best for the organization.
- We disclose any potential conflicts of interest immediately.
- We do not favor friends or family members when making business decisions.
- We do not accept gifts or otherwise act in a way to appear to gain from our role at BILHPN.

Personal Gifts and Entertainment

We follow policies on gifts. Personal gifts from vendors or those who do, or want to do, business with BILHPN or BILH should not influence or even appear to influence our decision making. Even gifts of nominal value, such as a tote bag or a pen from a vendor or potential vendor or other business partners, could be viewed as attempts to influence our decision making. Tokens of gratitude from patients may be accepted as long as they follow BILHPN's policies. Make sure to check with your manager or leader and be sure to learn our policies on what is acceptable for personal gifts from vendors or patients.

We say “no,” or ask that they donate. In some situations, it can be hard to turn down a personal gift, but alternatively, ask that the gift giver provide the gift to BILHPN to support our work. In these cases, they can contact Philanthropy to donate the gift.

Ask questions if you're not sure. The laws and regulations that apply to healthcare organizations and healthcare professionals giving and accepting gifts and entertainment can be complex. We hold ourselves to the highest possible standard, and we make sure to consult with our manager or one of the resources in this Code if we have any questions.

Make sure to check with your manager or leader and be sure to learn our policies on what is acceptable for personal gifts from vendors or patients.

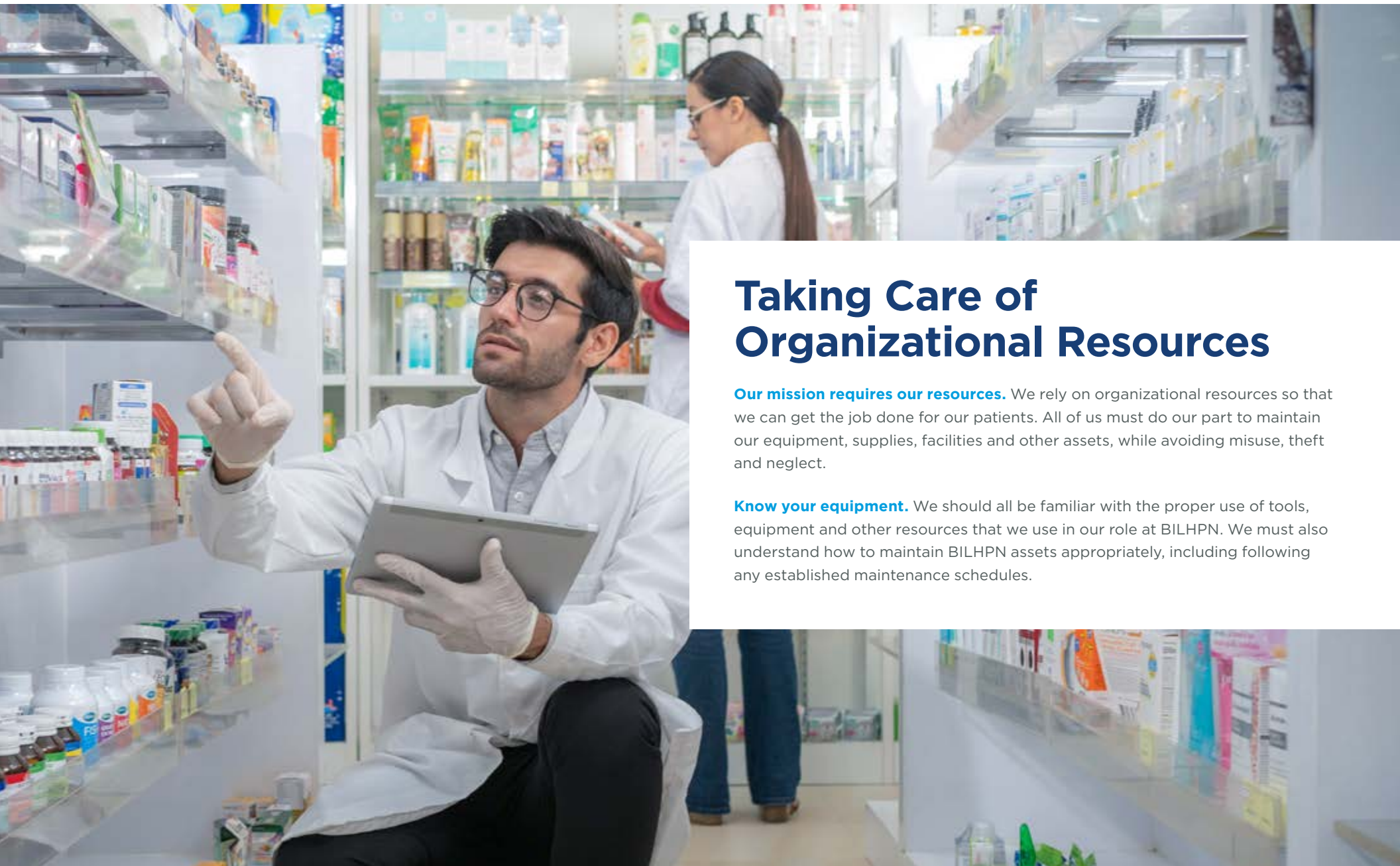


IN PRACTICE



A vendor is offering to bring in a holiday lunch spread for your staff. They have worked so hard and it would be a nice surprise. But you also know this vendor is competing for another contract with your organization. Can you accept this gift?

No. Our policies prohibit us from accepting gifts from vendors if the gift is meant to influence or appears to influence a business decision. If the vendor wants to make a contribution to support staff, research or other efforts at the institution, the vendor can contact Philanthropy.



Taking Care of Organizational Resources

Our mission requires our resources. We rely on organizational resources so that we can get the job done for our patients. All of us must do our part to maintain our equipment, supplies, facilities and other assets, while avoiding misuse, theft and neglect.

Know your equipment. We should all be familiar with the proper use of tools, equipment and other resources that we use in our role at BILHPN. We must also understand how to maintain BILHPN assets appropriately, including following any established maintenance schedules.



Reporting Any Fraud, Waste or Abuse

Look for false claims. We must make sure that we avoid making any false claims for payment to federal or state agencies. The U.S. False Claims Act and applicable state law make it illegal for BILHPN employees or affiliates to knowingly record or process any inaccurate information that is then provided to the government. We must watch for inaccurate coding, false expense reporting, false time reporting, changing beneficiary information or other data being modified. If you note any red flags in the reporting or claims being made to the government, seek assistance and contact your manager, leader or one of the resources listed in this Code.

Self-referral and kickbacks. State and federal laws also make it a crime for physicians and health care providers to improperly direct business or compensation of any kind to other organizations or entities with whom they have a financial relationship. Furthermore, it is illegal to provide a kickback or to pay for referrals for service. Any arrangement with a physician or organization associated with physicians must be in writing with rates at fair market value, meet a legitimate business need and be approved by the BILH Office of General Counsel. If you are in doubt about whether a situation may be problematic, you should contact Integrity and Compliance or our Office of General Counsel for guidance before proceeding.



HOW WE DO IT

- We watch for red flags in our billing and other reporting to the government. We make decisions based on what is best for patients and the interests of our institution.

Accurate Recordkeeping

Integrity and accuracy in our records. We keep both patient records and business records in accordance with federal and state law as well as our own policies and procedures. It is vital that our records accurately and completely reflect our business. Whether we maintain patient or business records, we are accountable for those records and must learn and follow the records management procedures that apply to our role while making sure that we access, use, store, transfer, and destroy records consistent with our policies and the record retention schedules. When notified, we comply with any request to preserve original documents, electronic information (emails, text messages, documents, etc.) or data for legal purposes.

Proper Billing and Coding

Correctly documenting and charging for services. We must make sure that billing is accurate, complete, and consistent with our policies and procedures. We follow state and federal laws and regulations as well as insurer rules and payor policies at all times. We ensure that the documentation reflects the services provided and uses the correct codes; if there are coding changes, we ensure that those changes are correct and that changes or corrections are documented appropriately.

If we note a mistake, we fix it. We do not intentionally create false or misleading documentation, and when we note errors, we take the time to fix them.

It's everyone's job. Physicians and other care providers should document information for billing purposes in an accurate and timely manner and make sure that coding is recorded accurately.



IN PRACTICE



While working a shift with a colleague, you notice that he is making changes to some inventory reports that had previously been filled out. When you ask him about it, he tells you he is just making some corrections. Is this OK?

Maybe. You should contact your manager to discuss the issue. It could be that he is appropriately correcting a mistake in our records, but in this sort of circumstance, it is appropriate for a manager to be involved and find out more.



Protecting Our Data

We protect both our data and the data shared with us. We have an obligation to protect the privacy of all data concerning patients, suppliers, contractors, vendors and others that we receive in the course of our work. To achieve the results we want with our partners, we must appropriately protect the data we use. We do that by making sure we follow our policies and procedures on the handling, use, storage, processing, transfer, sharing and destruction of data.

We follow organizational information security measures. We use the organization's networks, systems, hardware, software and other equipment safely and securely and follow all guidelines, policies and procedures.



HOW WE DO IT

- We follow our policies regarding the use of patient data.
- We use BILHPN equipment for appropriate business uses.
- We log out when not using a system, secure all files and protect our passwords.
- We tell Information Security (IS) about any cyber threats or phishing emails.
- We immediately report lost or stolen equipment, such as laptops or thumb drives, to IS and a manager, principal investigator or leader.

Confidentiality and Research Compliance

We keep our business private. We must be careful not to share confidential or proprietary information outside the organization. Only those with a need to know should have access to any confidential information such as intellectual property (patents, trade secrets, design rights, etc.) and sensitive business information such as development plans, financial data and projections, strategic business plans, marketing data, pricing data, supplier information and any other business operations data.

We protect research data. With regard to ongoing research studies, we are required to protect not only the privacy of study participants but all the data collected and reviewed during those studies as well. We must follow all of our policies and procedures as they pertain to research activity and show appropriate respect for the data of all participants.

IN PRACTICE



I am a member of an online group of alumni from my alma mater. We often discuss our careers, and I would really like to tell them about the new direction my team's cardiology research is taking. Is this OK?

You must first make sure that you understand what, if anything, you can share about any research studies that are ongoing. There may or may not be information that can be released to the public. You cannot share any information unless authorized to do so.





Cooperation with the Government

Interacting with the government. When we provide reporting, services, billing information and other data to the government, we need to make sure that we comply with all rules, policies and procedures. Claims for payment must accurately reflect the services provided and must not overstate any amounts owed.

We welcome and cooperate with agents. We fully cooperate with all government requests for audits and inspections. If law enforcement or regulators make any requests, we are cordial and immediately contact the Office of General Counsel, the Administrator on Duty or other departments as outlined in policies and procedures. Then we let the government agent know someone will respond. Refer to our policies for specifics around various law enforcement or regulator requests and to whom the requests should be directed.



HOW WE DO IT

- We follow those laws, regulations, rules, procedures and policies that apply to our work with the government.
- We cooperate with our government partners.

Responsible Competition

We provide superior service and quality health care. We achieve our results based on the quality of our service and not through unfair business practices. We do not make agreements with our competitors to set prices, allocate markets, discriminate against patients or suppliers, or coordinate any anti-competitive activities. We are careful when we have discussions with competitors to make sure we do not discuss competitive or confidential information.

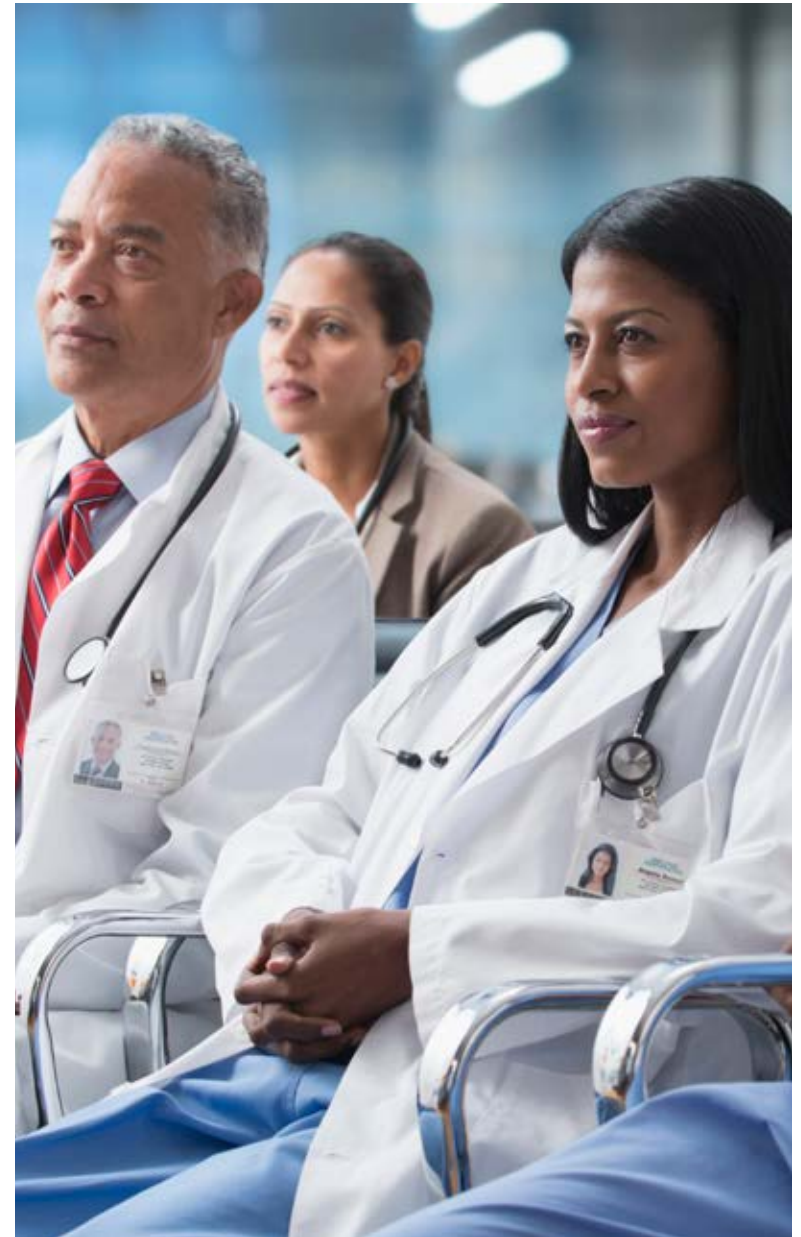
We gather any competitive information transparently. We collect competitive information only from public sources, published articles and other legal sources. We do not solicit former employees of competitors to provide any confidential information.

IN PRACTICE



While attending a medical seminar, you find yourself in a discussion with employees from a competing health organization. One of the employees starts asking about the pricing for certain services at BILHPN. What should you do?

You should end the discussion and report the incident to your manager. Any discussion involving competitive information could be considered illegal, no matter how informal. Antitrust laws are complex, so it is important to speak up and seek assistance if you find yourself in such a circumstance.



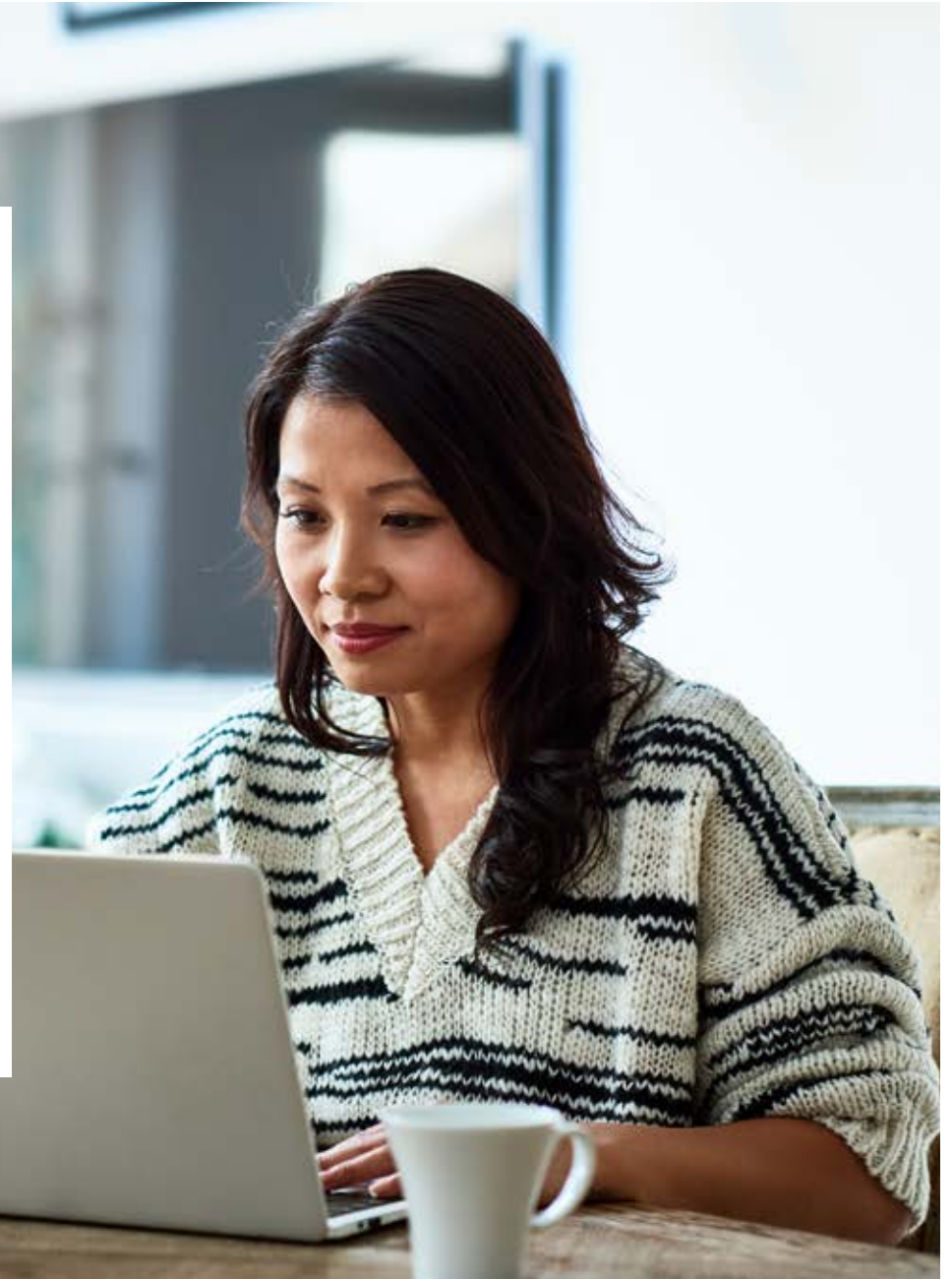
Responsible Communications

Don't speak for BILHPN. Unless your role and responsibilities specifically authorize you to speak on our behalf, don't. It can be tempting to defend the organization or try to explain to a third party how certain information about us is wrong, but that is the role of Marketing and Communications.

Don't share confidential information. When communicating outside the organization, including on social media, be mindful of your obligations to BILHPN and don't share any confidential information.

Messages can last forever. Be thoughtful and respectful when you make public statements or post on social media. When posting, you must make it clear you are speaking for yourself, not for the organization. Be careful to maintain patient privacy and to honor every other commitment that applies to our behavior online and in the workplace.

Speaking with the media. If you are contacted by the media or any organization wanting to film on-site or talk to staff, refer them to Marketing and Communications. We must speak with one voice through Marketing and Communications, even when the information or comment we want to share is positive.



Resources and Contacts

Speak Up

When in doubt, ask questions. When concerned, report.

Ask questions and report concerns to your manager or leader, BILHPN's Integrity and Compliance, Human Resources, or one of our other available resources:



Integrity and Compliance: Main Line 617-278-8300 or BILHIntegrityandcompliance@bilh.org



BILH Speak Up Hotline: 888-753-6533 or BILH.ethicspoint.com



Human Resources



For stolen or lost equipment: IT Service Desk (servicedesk.bilh.org)

