

# Code of Ethics & Business Conduct

Maintaining the Highest Standards of Ethical Excellence



UMass Memorial Medical Center • UMass Memorial Medical Group

UMass Memorial Health Ventures • Clinton Hospital • Community Healthlink

Central New England HealthAlliance • Marlborough Hospital • Wing Memorial Hospital and Medical Centers

## ***Letter from the President and Chief Executive Officer***

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The mission of UMass Memorial Health Care is to improve the health of the people of Central New England through excellence in clinical care, service, teaching and research. As the region's preeminent health care system, we value integrity and honesty, and we treat all patients, employees, physicians and visitors with dignity and respect.

To ensure we conduct our business according to the highest standards, we established a Code of Ethics and Business Conduct to guide our decision-making regarding patient care, employee relations and business practices. These principles apply to all employees, physicians, agents and vendors, as well as members of the Boards of Trustees, so it is important to familiarize yourself with the legal and ethical standards outlined in this booklet.

If you have any questions regarding our Code of Ethics and Business Conduct or have concerns that any part of our Code is not being met, please contact your supervisor, your Compliance Office or the appropriate Compliance Office Confidential Reporting Line listed in the Appendix of this booklet.

Your involvement and vigilance are important. We continuously monitor our compliance with the Code of Ethics and Business Conduct and provide training as needed to achieve these goals.

We are dedicated to providing the highest quality care and commit to keeping the patient at the center of all our decision-making. Thank you for your adherence to these values and standards. Our patients and colleagues deserve no less.



John G. O'Brien

President and CEO, UMass Memorial Health Care

January 2009

Our Code of Ethics and Business Conduct provides guidance to all UMass Memorial “covered individuals.” Covered individuals — a term used throughout this booklet — include members of the Board of Trustees, employees, medical staff, housestaff, trainees, agents and vendors of UMass Memorial.

Throughout this booklet there are references to individuals and departments that you, as a covered individual, can call to report a violation of the Code or for additional information. For specific telephone numbers, see the Appendix which has a directory of contacts for each UMass Memorial entity.

Our Code builds upon the Mission, Vision and Values of each of our member entities. These statements are also included in the Appendix.

The Code applies to all entities that are part of our UMass Memorial Health Care. Throughout this booklet we refer to all these entities simply as “UMass Memorial.” In addition to our “parent” corporation, these entities include:

- UMass Memorial Medical Center
- UMass Memorial Medical Group
- UMass Memorial Health Ventures
- Clinton Hospital
- Community Healthlink
- Central New England HealthAlliance
- Marlborough Hospital
- Wing Memorial Hospital and Medical Centers

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## ***Purpose of the Code of Ethics and Business Conduct***

Our Code of Ethics and Business Conduct assists us in carrying out our daily activities within appropriate ethical and legal standards. These obligations apply to our relationships with patients, our medical staff, third-party payers, and all covered individuals of the organization. The Code is intended to be comprehensive and easily understood. In some instances, the Code deals fully with the subject matter. In many cases, however, the subject matter is more complex and requires additional guidance for those individuals directly involved. For this detailed information, consult our Intranet sites, especially the Compliance Office and Policy sections.



The Code communicates to all covered individuals the expectation and requirement of ethical conduct and compliance with all applicable laws, as well as the policies of UMass Memorial member entities. Ethical conduct and compliance is a personal responsibility and every covered individual is held accountable for his/her conduct.

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### **Leadership Responsibilities**

While all covered individuals are obligated to follow our Code, UMass Memorial expects our leaders to set the example and be a model. Our leaders must ensure that those on their team have sufficient information to comply with laws and UMass Memorial policy as well as the resources to resolve ethical dilemmas. Our leaders must help to create a culture within UMass Memorial that promotes high standards of ethics and compliance. This culture must encourage everyone in the organization to raise concerns when they arise. UMass Memorial must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

### **Supervisor and Management Responsibilities**

Managers and supervisors are expected to set an ethical “tone” and to be role models for ethical behavior in their departments. These leaders should create a departmental culture that promotes the highest standards of ethics and compliance, and encourages everyone in the department to voice concerns when they arise. Leaders are responsible for ensuring that all individuals under their supervision receive a copy of the Code of Ethics and Business Conduct, receive training on the Code and understand the Code’s application to the individual’s day-to-day responsibilities. If there are questions regarding the Code, leaders should facilitate communication with the Compliance Office for clarification or training. Finally, leaders are required to ensure and verify that all individuals reporting to them attend appropriate compliance training.

## Acting with Integrity

It is the policy of UMass Memorial to provide and maintain a culture characterized by integrity, responsible behavior and a commitment to the highest legal and ethical standards. All UMass Memorial covered individuals share responsibility for ensuring that UMass Memorial conducts its activities in a compliant manner. This includes ensuring the integrity of all claims, reporting of inappropriate conduct and protecting the rights of any individual who reports concerns. The UMass Memorial Medical Center Fraud and Abuse Reporting Policy (and similar policies of other UMass Memorial entities) discusses these expectations in detail. The policy also discusses the federal and state False Claims Acts, whistleblower rights and protection, and the Compliance Program structure, as required by the Deficit Reduction Act of 2005.



### Compliance Program Structure

UMass Memorial is committed to effectively communicating our standards, policies and procedures to all covered individuals by providing education and training to develop compliance awareness and commitment. It is the responsibility of each manager to ensure the individuals reporting to him/her receive all required training.

The vice president and chief compliance officer is responsible for overseeing the Compliance Program for all UMass Memorial entities. The Board of Trustees/Directors of each UMass Memorial entity has adopted a Compliance Program and has appointed a Compliance Committee. Each UMass Memorial entity chief executive officer and the entity Compliance Committee are responsible for ensuring the effectiveness of that entity's Compliance Program. Each covered individual remains responsible and accountable for his/her own compliance with applicable laws and UMass Memorial policies.

UMass Memorial member entities should ensure:

- All covered individuals are educated about the UMass Memorial Code of Ethics and Business Conduct, applicable laws and UMass Memorial policies
- There is reasonable auditing, monitoring and oversight of compliance with these laws and policies
- Mechanisms exist to investigate, discipline and correct noncompliance
- Responsibility is not inappropriately delegated to individuals who have previously violated the law or UMass Memorial policies
- Covered individuals are encouraged to report noncompliance without fear of retribution

### Code of Ethics and Business Conduct Guidelines

UMass Memorial expects all covered individuals to conduct themselves in accordance with all legal requirements and institutional policies that apply to their position. All covered individuals must adhere to the basic guidelines outlined below.

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UMass Memorial must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

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## Our Mutual Responsibilities

The guiding principle of UMass Memorial is simple: Do what is right.

Although simple to write, it is sometimes more difficult to do. We should each understand UMass Memorial policies, procedures and associated laws, as well as UMass Memorial policies applicable to our individual responsibilities. We should ask questions when we do not understand, are confused or feel that UMass Memorial practices are inconsistent with these laws and policies.



When faced with a tough ethical decision, UMass Memorial expects individuals to consider the following:

- Does the action comply with UMass Memorial policy?
- Does the action comply with applicable laws?
- How would the action look to covered individuals, our patients and our community if it were published on the front page of the newspaper?
- Are we being fair and honest?

Most importantly:

- When we know the action is wrong, do not do it!
- When not sure, we should ask our supervisor, or call the Compliance Office or Office of the General Counsel.

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## Reporting Wrongdoing

Ethical behavior is the responsibility of every covered individual. Each individual has a personal obligation to report any activity that appears inconsistent with applicable laws or UMass Memorial policies.

UMass Memorial encourages communication, dialogue and reporting of incidents of potential wrongdoing or suspected violations. If a covered individual has reasonable cause to believe that such an incident has occurred, he/she is expected to report these concerns to his/her supervisor or manager. Alternatively, he/she may report these concerns anonymously to the Compliance Office Confidential Reporting Line (see Appendix for telephone number).

It is important that individuals act in good faith in making any report. UMass Memorial will not retaliate against any person that reports an incident in good faith. The section Reporting of Violations provides additional discussion and contact information on reporting wrongdoing.

## Compliance with Applicable Laws

Simply put, UMass Memorial is committed to complying with all applicable laws, standards of care and accreditation standards which govern our organization. This requires an extensive team effort on every individual's part.

UMass Memorial is also committed to complying with our obligations to those who pay for the services we provide. These include all federal and state health care programs (including Medicare and Medicaid), commercial payers, grant-funded programs and our patients themselves. It is incumbent on each of us to ensure the integrity of all claims submitted for payment of the services and supplies of the care that we render.

## Tax-Exempt Organization

As a tax-exempt organization and in accordance with Internal Revenue Service regulations, UMass Memorial has a legal and ethical obligation to engage in activities and allocate resources to further its charitable purpose. UMass Memorial resources should never be used for or to advance personal interests.

Transactions involving UMass Memorial and covered individuals should occur only when in the best interests of UMass Memorial. These transactions must be fair market value and comply in all ways with requirements set forth in the UMass Memorial Medical Center Conflicts of Interest Policy and other applicable UMass Memorial policies, and applicable policies at all other entities. Compensation arrangements must be fair market value and comply in all ways with the UMass Memorial Medical Center Compensation Policy or the applicable policies at other entities. Violation of these rules could result in the imposition of sanctions against UMass Memorial or the loss of tax-exempt status for UMass Memorial.



## Excelling at Patient-Centered Care

### Patient Care

All patients are entitled to equal access to care, to be treated with caring and respect, and to the protection of their privacy and the confidentiality of their medical and financial records.

UMass Memorial is committed to:

- Achieving patient-focused excellence through the highest standards of quality care, patient safety and patient satisfaction
- Equal access to care
- Providing care consistent with UMass Memorial policies, professional standards and regulatory requirements, including but not limited to Joint Commission standards of care and the Centers for Medicare and Medicaid Services Conditions of Participation
- Treating patients with warmth, respect and dignity, and providing care that is both necessary and appropriate
- Informing patients of their rights and responsibilities, and notice of privacy practices
- Clinical decision-making focused upon patient needs, ensuring that patient admission, discharge and transfer policies are based on the patient's clinical needs and not the source of payment
- Inclusion of patients in decisions regarding their care, and alternatives and risks associated with this care
- Assuring that all staff has the necessary credentials to perform their specific duties
- Accurate, timely and complete documentation supporting clinical services provided, and correctly billed

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- Privacy and confidentiality of medical record information, with access to patient care information limited to those involved with the treatment of the patient, quality oversight or administration of patient accounts
- Educating patients regarding the costs of their care, and facilitating timely and responsive resolution of billing related disputes

### Licenses and Credentials

Covered individuals must obtain and maintain required licenses or other credentials needed for their area of service. The granting of licenses, credentials or other privileges must be based upon accurate and complete information by the applicant. The suspension or revocation of these credentials or licenses must be immediately communicated, as appropriate, to the covered individual's supervisor or manager, division chief or department chair, and the Medical Staff Services Office.



UMass Memorial does not allow any individual or practitioner, allied health care professional or clinician to work within any entity without current licensure and/or required credentials.

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### Emergency Treatment

Medical screening examinations are provided to all patients presenting to UMass Memorial with a potential emergency medical condition, regardless of the patient's ability to pay, to determine if an emergency medical condition exists or, for pregnant women, if active labor exists, and, if so, appropriate stabilizing treatment is provided. This is consistent with the Emergency Medical Treatment and Active Labor Act (EMTALA). Patients with an emergency medical condition are only transferred at the patient's request or if the patient's medical needs cannot be met at UMass Memorial.

### Occurrence Reporting

All employees and licensed independent practitioners are required to notify their Risk Management Department, immediately or as soon as possible after patient care priorities are met, of any events in which they are involved or become aware of. These events are defined in the UMass Memorial Medical Center Occurrence (Incident) Reporting Policy and other related policies of the Medical Center and other entities.

Covered individuals who report adverse events may do so without fear of reprisal in relationship to their employment or medical staff status as a result of reporting. If it is determined that an individual may be in violation of these principles, if there is evidence of criminal intent and/or if there is a pattern of behavior that could threaten patient safety and/or is indicative of ongoing substandard job performance, further action may occur under pertinent policies and procedures.

*If you have questions, contact your Risk Management Department (see Appendix for telephone number).*

**For Example:** *An inpatient is transported on a stretcher to another department for testing. The patient falls from the stretcher and gets injured prior to receiving the test. After the patient is cared for appropriately, anyone who either directly observed or has knowledge of the fall should complete an occurrence report and send it to the Risk Management Department for follow up. The documentation on the occurrence report should be factual and concise and should not include opinions or assign blame. Remember — this occurrence report can be filled out by any hospital employee.*

## Medicare Conditions of Participation/Massachusetts Department of Public Health

UMass Memorial is committed to complying with all applicable laws including Medicare Conditions of Participation and Massachusetts Department of Public Health (DPH) regulations. Furthermore, covered individuals are expected to work collaboratively with the DPH in the conduct of applicable surveys or other interactions.



## Joint Commission and Other Accreditation Agencies

UMass Memorial believes strongly in the Joint Commission and other applicable accreditation processes, and is committed to adhering to the accreditation standards and to the highest quality patient care.

## Patient Rights

Every patient of UMass Memorial Medical Center has the right:

- To freedom of selection of a physician except for emergency medical treatment, provided that the physician is able to accommodate the patient
- To receive, upon request, an itemized bill reflecting charges from the physician and/or the facility including laboratory charges, pharmaceutical charges, and third party credits and charges
- To obtain, upon request, the name and specialty of the physician or others responsible for your care or coordination of care
- To confidentiality of all records and communication as provided by law
- To have all reasonable requests responded to promptly and adequately within the capabilities of this facility
- Upon request, to obtain an explanation as to the relationship, if any, of UMass Memorial to any other health care facility or educational institution as it relates to your care or treatment
- Upon request, to receive any information which this facility has available relative to financial assistance and free care as well as any rules that apply to your conduct as a patient at UMass Memorial
- Upon request, to inspect your medical records and to receive a copy for a fee determined by the current rate of copying expenses
- To refuse to be examined, observed or treated by students or any other staff member without jeopardizing access to psychiatric, psychological, or other medical care and attention

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All employees and licensed independent practitioners are required to notify their Risk Management Department, immediately or as soon as possible after patient care priorities are met, of any events in which they are involved or become aware of.

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In accordance with our policies and procedures, UMass Memorial covered individuals may only access information necessary to perform their jobs, and this information is released only to persons authorized by law or by the patient's written authorization.

- To refuse to serve as a research subject and to refuse any care or examination when the primary purpose is educational or informational rather than therapeutic
- To privacy during medical treatment or care within the capacity of UMass Memorial
- To lifesaving treatment in an emergency without discrimination because of source of payment or delay due to discussions of source of payment
- To informed consent to the extent provided by law, including the right to accept or refuse medical treatment, including foregoing or withdrawing life-sustaining treatment or withholding resuscitative services
- To appropriate assessment and management of pain
- If you are a female rape victim of childbearing age, to receive medically and factually accurate written information prepared by the Massachusetts commissioner of public health about emergency contraception, to be promptly offered emergency contraception and to be provided with emergency contraception, upon request
- If you have breast cancer, to complete information regarding alternative treatments which are medically viable; if you are having a breast implant, you have the right to know the disadvantages and risks associated with breast implantation, and your physician should discuss this with you at least 10 days before the planned surgery, except in an emergency
- To be free from seclusion, physical restraints and medications that are used as restraints when they are not medically necessary
- To have a family member or other representative and your own physician notified of your admission to the hospital
- To formulate advance directives and revise those directives at any time; in Massachusetts, the tool for implementing your advance directives is a Health Care Proxy
- To receive care in a safe setting free from all forms of abuse or harassment

**For Example:** *When a patient enters the hospital, staff members ask the patient if he/she has a health care proxy. A health care proxy is someone who the patient chooses to make decisions about his/her care and treatment if unable to do so personally. This is an example of one way in which UMass Memorial demonstrates support for a patient's right to determine his/her care decisions while under our watch.*

### Privacy and Security of Patient Health Information

To provide quality care, UMass Memorial collects sensitive information about every patient's medical condition, history, medication and family illness. Because of the nature of this information, UMass Memorial is committed to maintaining its confidentiality and security.

Under the Health Insurance Portability and Accountability Act, commonly referred to as HIPAA, we are required by law to maintain the privacy of patient health information and to provide a notice of information practices to our patients, which outlines our legal duties and patient rights related to their health information maintained by our organization.

UMass Memorial does not use, disclose or discuss patient-specific information with others except as set forth in the Notice of Information Practices, as necessary for treatment, payment or operations, or as authorized by law.

In accordance with our policies and procedures, UMass Memorial covered individuals may only access information necessary to perform their jobs, and this information is released only to persons authorized by law or by the patient’s written authorization.

UMass Memorial has determined standards for electronic protected health information to safeguard the confidentiality, integrity and availability of this information while it is stored and during electronic transmission.

Under Massachusetts law we are required to provide notifications about unauthorized breaches of security involving personal information (e.g., a Massachusetts resident’s first name and last name or first initial and last name in combination with any one or more of the following data elements: social security number, driver’s license number, state-issued identification card number, financial account, credit card or debit card number with or without any required security code, access code, PIN or password that would permit access to the account).

*If you have questions or to report a breach of security involving personal information, contact your Privacy Office (see Appendix for telephone number).*



UMass Memorial strives to provide a working environment based on respect, fairness, honesty and integrity, and has developed workplace policies and practices to support this goal.

**For Example:** *If you know a relative, friend or coworker is being treated at one of our facilities, you should not access, use or disclose his/her protected health information. If it is a part of your role to process information, such as medical records or billing for payment, you should consider it an ethical responsibility to disclose the relationship and have a colleague process that information where practical. If it is not practical, you are ethically bound to keep that information confidential, even to the patient.*

## **Respecting One Another**

### **Workplace Conduct**

UMass Memorial strives to provide a working environment based on respect, fairness, honesty and integrity, and has developed workplace policies and practices to support this goal.

Safety and quality of patient care are fostered by a collaborative environment of courtesy and mutual respect. Intimidating and disruptive behaviors are unprofessional and are not tolerated. Behaviors that are considered intimidating and disruptive can be verbal or physical. They include verbal outbursts and foul language; sexual harassment in any form; physical roughness; threats; refusing to perform assigned tasks; quietly exhibiting uncooperative attitudes during routine activities; reluctance or refusal to answer questions, return telephone calls or pages; condescending language or voice intonation; and impatience with questions. Covered individuals should conduct themselves in a responsible manner that protects the interests of UMass Memorial.

## Diversity and Equal Employment Opportunity

UMass Memorial is committed to enhancing diversity in the workplace and a positive work environment. UMass Memorial is an equal opportunity/affirmative action employer and complies with all applicable federal and state laws in this area. Employee hiring, personnel actions, and social and recreational programs sponsored by UMass Memorial are designed and administered without discrimination with respect to race, color, religion, gender, age, sexual orientation, national origin, veteran status, disability or any other category protected by law. UMass Memorial workforce members strive to celebrate our diversity, and to build on each others' differences and expertise.



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The policies of UMass Memorial prohibit discrimination or harassment. Retaliation against any person seeking to report concerns in good faith regarding our compliance with applicable laws or UMass Memorial policies is not tolerated.

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## Discrimination and Harassment

The policies of UMass Memorial prohibit discrimination or harassment. Retaliation against any person seeking to report concerns in good faith regarding our compliance with applicable laws or UMass Memorial policies is not tolerated.

Employees should bring concerns to their manager, Human Resources Department or the Equal Opportunity Office. The manager, in consultation with the Human Resources Department and/or Equal Opportunity Office, will promptly follow up to address the particular behavior and to ensure that all parties understand that UMass Memorial policies prohibit discrimination or harassment, and that retaliation against any individual for reporting concerns is not tolerated.

*If you have questions or wish to report suspected discrimination or harassment, call your Human Resources Department or the Equal Employment Opportunity Office (see Appendix for telephone number).*

**For Example:** *An employee works in a close-knit department where people frequently make sexual jokes or engage in discussions about sexual topics. Most of the staff participate and appear to enjoy the conversation. However, several employees are uncomfortable and are concerned that the conversations might be heard by visitors or patients. These employees do not feel comfortable in speaking directly to their coworkers, fearing the coworkers will be angry or think the employees are "too sensitive." In this case they should contact their Human Resources Department.*

## Workplace Violence

UMass Memorial prohibits workplace violence, including behavior that is threatening, overly aggressive, confrontational or violent (e.g., verbal threats, stalking, terrorism, hate crimes or similar conduct).

*Workplace violence should be reported immediately to your Security Office (see Appendix for telephone number).*

## Individuals with Disabilities

UMass Memorial is committed to providing access for individuals with disabilities in compliance with the law. Covered individuals should not discriminate against individuals with disabilities in any manner that violates the law, including discrimination in an offer, term or condition of employment at UMass Memorial.

*If you have questions or to report concerns, contact the applicable Human Resources Department (see Appendix for telephone number).*

## Alcohol-free and Drug-free Workplace

UMass Memorial is committed to an alcohol-free and drug-free workplace. Prescription medications and devices, including controlled substances, must be handled only by legally authorized people. While on duty, employees or contractors may not be under the influence of alcohol or any other substance, whether or not legally obtained, that may interfere with their ability to perform their job. The UMass Memorial Employee Assistance Program is available at no cost to employees with alcohol, drug or other personal problems that may affect work performance.

*If you have questions or for more information, call your Employee Assistance Program (see Appendix for telephone number).*

## Health and Safety

UMass Memorial is committed to providing a safe and healthy workplace. Employees must understand and comply with UMass Memorial policies and applicable laws relating to health and safety that apply to their areas of responsibility. These policies and laws include, but are not limited to, occupational safety and environmental laws, and laws applicable to the proper storage and disposal of medical waste and other hazardous materials.

*If you have questions, contact your Safety/Environmental Health and Safety Office, Office of the General Counsel or your Compliance Office (see Appendix for telephone number).*

## Embracing Accountability

### Fraud and Abuse and Self-referral Laws

Covered individuals must understand and comply with applicable fraud and abuse and self-referral laws and UMass Memorial policies relating to their areas of responsibility.

Covered individuals must be vigilant in ensuring the complete and accurate documentation of patient care services and submission of associated claims. They must not offer to pay, solicit or accept money, gifts or services in return for the referral of patients, or to induce the purchase of items or services.



While on duty, employees or contractors may not be under the influence of alcohol or any other substance, whether or not legally obtained, that may interfere with their ability to perform their job.

Covered individuals must avoid any conduct that could violate federal or state laws concerning fraud and abuse, false claims, anti-kickback and self-referrals (Stark), or even appear to violate these laws.

Prohibited activities include but are not limited to the following:

- Billing for supplies or services not delivered
- Misrepresenting services actually provided
- Duplicate billing for services rendered
- Seeking to increase reimbursement by “upcoding,” which results in billing for medical procedures/tests or services meriting higher reimbursement than those actually furnished, or “unbundling” (dividing a procedure or service generally billed as one procedure or service into two or more component parts in order to increase reimbursement)
- Seeking to collect amounts exceeding the copayment and deductible from a Medicare or Medicaid beneficiary, or any beneficiary who has assigned his/her rights to health benefits to us
- Falsely certifying that services were medically necessary (certifying a nonexistent medical condition)
- Falsely certifying that an individual meets the Medicare requirements for home health or any other services
- Entering into contracts, leases or other business transactions at other than fair-market value (for example, paying in excess of fair-market value in return for other goods or services such as referrals, other contractual arrangements or personal items)
- Entering into contracts, leases or other business transactions or relationships with referral sources such as physicians, without meeting strict regulatory requirements; the Office of the General Counsel should pre-approve any contractual relationships with referral sources (See Physician Arrangements and Relations below.)
- Offering money, gifts or other items of value to a patient or prospective patient to influence the receipt of services from UMass Memorial
- Permitting a provider or supplier who is excluded from federal health care programs to provide goods or services through UMass Memorial to federal health care program beneficiaries

*If you have questions, contact your Compliance Office or Office of the General Counsel (see Appendix for telephone number).*

### **Physician Arrangements and Relations**

Arrangements with physicians are governed by state and federal laws, including the federal and state anti-kickback statutes and the Stark laws on self-referrals. Generally, the arrangements governed by these laws include but are not limited to:

- Any payments for services rendered
- Provision of space or services to or by physicians or organizations with which physicians have a financial relationship
- Recruitment and compensation of physicians
- Arrangements for physicians to serve in administrative roles within UMass Memorial



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Covered individuals must avoid any conduct that could violate federal or state laws concerning fraud and abuse, false claims, anti-kickback and self-referrals (Stark), or even appear to violate these laws.

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To ensure compliance with these laws:

- UMass Memorial accepts patient referrals and admissions based exclusively on the patient’s clinical needs and our ability to provide medically necessary services. We do not offer to pay, solicit or accept money, gifts or services in return for the referral of patients.
- Any arrangement with a physician or organization associated with the physician must be in writing, with rates at fair-market value, and must be approved by the Office of the General Counsel.
- Because of the complicated and sensitive nature of joint venture arrangements, all such arrangements must be approved by the Office of the General Counsel.
- UMass Memorial has an open medical staff and a privileging process which relies upon uniformly applied professional criteria, without discrimination on the basis of race, ethnicity, sex or any other protected category of the law.



**Contracting**

UMass Memorial business must be conducted in compliance with applicable laws and UMass Memorial policies. Any financial, governance or family relationships which covered individuals have with existing or prospective vendors or personnel should be disclosed promptly prior to the commencement of any bidding or contracting process. Individuals must comply with the UMass Memorial Medical Center Conflict of Interest Policy or the applicable policies at other entities.

*If you have questions, contact your Compliance Office or Office of the General Counsel (see Appendix for telephone number).*

**Vendor Discounts/Rebates**

Commissions, rebates, discounts and allowances are customary and acceptable business practice, if they are consistent with UMass Memorial policy and do not constitute illegal payments.

They should be:

- Reasonable in value
- Competitively justified
- Properly documented
- Appropriately accounted for
- Made to or by the UMass Memorial entity to which the original agreement or invoice was made or issued

**Accuracy of Financial Reporting and Billing**

All UMass Memorial records, documents and reports must be accurate, complete and in compliance with applicable laws and UMass Memorial policies.

Among other reports required to be filed, UMass Memorial business involves reimbursement under government programs that require the submission of certain reports of our costs of operations. UMass Memorial complies with federal and state laws relating to all cost reports. The law defines what costs are allowable and outlines the appropriate methodologies to claim reimbursement for the cost of services provided to program beneficiaries.

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Any financial, governance or family relationships which covered individuals have with existing or prospective vendors or personnel should be disclosed promptly prior to the commencement of any bidding or contracting process.

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All bills for UMass Memorial services must be supported by actual services and supplies provided and by required documentation. As part of our documentation efforts, UMass Memorial maintains current and accurate medical records. Any subcontractors engaged to perform billing or coding services must have the necessary skills, quality assurance processes, systems and appropriate procedures to ensure that all billings for government and commercial insurance programs are accurate and complete.



**For Example:** *Correctly coding inpatient and outpatient medical records is necessary to maintain accurate and complete patient medical records to allow us to bill government and commercial insurance programs and generate appropriate revenue. To support these efforts, the Health Information Management/Medical Records Department at each of our entities provides coder education and inservices to maintain necessary technical coding skills.*

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Covered individuals owe loyalty to UMass Memorial and may not use their positions to profit personally or to assist others in profiting at the expense of the organization.

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### Avoiding Conflicts of Interest

Covered individuals owe loyalty to UMass Memorial and may not use their positions to profit personally or to assist others in profiting at the expense of the organization. (Refer to the UMass Memorial Medical Center Conflict of Interest Policy or applicable policies of other entities for further guidance.) Covered individuals must obey all applicable laws applying to conflicts of interest for nonprofit and charitable corporations.

Conflicts of interest can take many forms. The following examples of activities by a covered individual or family member may constitute a conflict of interest:

- Ownership in or employment by any outside concern which does business with UMass Memorial
- Representation of UMass Memorial by a covered individual in any transaction in which he/she or a family member has a substantial personal interest
- Competition with UMass Memorial by a covered individual, directly or indirectly, in the purchase, sale or ownership of property or property rights or interests, or business investment opportunities
- Disclosure of confidential, special or inside information of or about UMass Memorial, particularly for personal profit or benefit of a covered individual or family member

**For Example:** *An employee with a significant investment in the stock of a vendor or prospective vendor or receiving any amount of compensation from that vendor should disclose this information if he/she is asked to participate in any process which could influence a business transaction between UMass Memorial and that vendor. If the employee has a family member with employment or financial relationships similar to those above, these relationships should be disclosed. The employee may participate in establishing criteria to assist in a decision, but should not participate in making or influencing the decision.*

Covered individuals should discuss potential conflicts of interest with their managers and should contact their Compliance Office (see Appendix for telephone number) with questions or issues. Any covered individual involved with purchasing or contractual arrangements with external parties should ensure potential conflicts are discussed with and disclosed to their managers and, as necessary, with the Compliance Office at the commencement of such processes.

### Insider Trading in UMass Memorial Bonds

From time to time UMass Memorial engages in tax-exempt financing which results in issuing bonds. These bonds are considered publicly traded securities and, as such, are regulated by federal securities laws.

UMass Memorial policy requires scrupulous compliance with the requirements of securities laws that prohibit buying or selling securities while possessing material nonpublic information as well as furnishing such information to another who buys or sells. These illegal activities are commonly referred to as “insider trading.” All information that an investor might consider important in deciding whether to buy, sell or hold securities is considered material. All covered individuals including those of UMass Memorial member entities must comply with these laws and UMass Memorial policies. This extends to all information about the affairs of UMass Memorial or its member entities, specifically information which might be of interest to persons considering the purchase or sale of the bonds.

There are two categories of individuals for whom this policy applies and different rules apply to each.

- **Designated persons:** This includes trustees, all members of Board of Trustees committees, officers, vice presidents, directors and department heads, department chairs, chiefs and physician leaders, and all persons whose primary job responsibility is to select or assist in the selection of a provider of goods or services. For all of the above individuals and their family members, there is an absolute prohibition on the trading in any UMass Memorial bonds. This prohibition extends to trading in the bonds for the account of another, having anyone else trade for these designated persons or sharing of information to another who then trades.
- **All other covered individuals or members of the medical staff:** When a covered individual knows material nonpublic information about UMass Memorial or its member entities, he/she is prohibited from trading in any UMass Memorial bonds. This prohibition extends to trading in the bonds for the account of another, having anyone else trade for the covered individual or sharing of information to another who then trades.



UMass Memorial policy requires scrupulous compliance with the requirements of securities laws that prohibit buying or selling securities while possessing material nonpublic information.

**For Example:** Any individual listed above under designated persons is prohibited from trading in UMass Memorial bonds, in trading in UMass Memorial bonds for the account of another, or having another trade for him/her. A staff nurse, pharmacist or other staff-level employee may trade in UMass Memorial bonds unless they are in possession of material nonpublic information about UMass Memorial or its member entities, such as financial reports or statements.

### Gifts from Patients

All covered individuals are prohibited from soliciting money, personal gratuities or gifts, and from accepting personal gratuities and gifts of more than a nominal value from patients and their families. Money may never be accepted by a workforce member from a patient or patient family. Gifts of perishable items, such as flowers or cookies, given as tokens of appreciation by patients and their families may be accepted and should be shared among unit staff. Patients and family members should not be expected or encouraged to provide gifts or gratuities in return for patient care.



***For Example:** A patient's family members would like to thank the staff for the exceptional care provided to their loved one. It is appropriate that they might drop off candy, baked goods or a similar small token for sharing by the unit staff. However, if the family would like to provide a more sizable recognition the staff should suggest that the family discuss their gift with a member of the UMass Memorial Foundation staff rather than make a significant gift to the patient unit itself.*

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All covered individuals are prohibited from soliciting money, personal gratuities or gifts, and from accepting personal gratuities and gifts of more than a nominal value from patients and their families.

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### Charitable Donations/Fundraising

The UMass Memorial Foundation is responsible for raising funds for purposes established by senior leadership and the Board of Trustees. The Foundation may solicit corporations, endowments, trusts, not-for-profit and other health care providers and patients. All corporate interactions and patient solicitations must comply with applicable state and federal laws, the UMass Memorial Medical Center Conflict of Interest Policy, applicable policies at other entities, and this Code of Ethics and Business Conduct. Corporate/vendor donations may not influence the corporation's/vendor's relationship (or potential relationship) with UMass Memorial.

The UMass Memorial Foundation is responsible for coordinating fundraising activities and the solicitation and processing of all gifts made to UMass Memorial. Physicians or managers with influence over purchasing decisions related to goods or services should not solicit vendors or prospective vendors who provide those goods or services.

All gifts must be received by the Foundation. No covered individual should be compelled to give gifts or participate in fundraising, and any gifts given or received should be appropriate and consistent with UMass Memorial policy.

### Vendor Relationships (Gifts, Entertainment, Meetings, Meals, Sponsorship)

UMass Memorial Health Care, UMass Memorial Medical Center, UMass Memorial Medical Group and UMass Memorial Health Ventures have adopted a policy whereby, in general, no gifts, entertainment, meals, sponsorship or anything of value of any kind may be accepted from any clinical vendor by any UMass Memorial clinical personnel (employed physician, nurses, technicians, etc.) or agent acting on behalf of UMass Memorial, unless the gift, sponsorship, etc., meets a specific exception in the Vendor Relationships Policy.

The only exceptions include:

- Meals provided as part of UMass Memorial/UMass Medical School continuing medical education (CME) events sponsored by clinical vendors consistent with the Vendor Relationships Policy
- Meals provided as part of national CME events

All funding to support CME and graduate medical education programs must be directed to the respective UMass Memorial Foundation development office. Funding may be restricted to a clinical department and must be overseen by the department chair or senior vice president.

Each UMass Memorial entity has a policy addressing requirements related to vendor relationships. Consult the entity compliance officer with related questions.

*If you have questions, contact your Compliance Office (see Appendix for telephone number).*

### Academic/Research Integrity

UMass Memorial and UMass Medical School are jointly responsible for and dedicated to upholding the legal and ethical standards applicable to medical education and research, including federal and state requirements relating to scientific misconduct, the protection of human subjects in research and the use of animals in research. Research data must be accurate and complete. All patients asked to participate in a research protocol or project will be given a full explanation of alternative services that might prove beneficial to them. Patients will also be fully informed of the risks, expected benefits and alternatives, as well as the procedures to be followed, especially those that are experimental in nature.

### Antitrust Laws

Antitrust laws prohibit agreements which unreasonably restrain trade or eliminate competition. For example, covered individuals may not engage in price fixing, collusion regarding bids, or agreements with competitors to allocate customers or markets, nor should they discuss pricing, bids, markets, customers and related matters with our competitors.

*If you have questions, contact the Office of the General Counsel (see Appendix for telephone number).*

### Safeguarding and Use of Resources

Covered individuals must ensure UMass Memorial resources are used to support the charitable purposes of UMass Memorial and that these resources are protected against loss, theft or misuse. These resources include, but are not limited to, employee time, supplies, equipment, databases, records, proprietary business information, strategic plans, business plans and financial data. Limited, occasional, incidental personal use of resources such as telephone or e-mail may be permitted, subject to UMass Memorial policies and procedures. Decisions related to support or sponsorship of outside organizations or activities must be approved by senior leadership.

*If you have questions or concerns, address these to your supervisor or your Compliance Office (see Appendix for telephone number).*



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The UMass Memorial Foundation or respective entity development office is responsible for coordinating fundraising activities and the solicitation and processing of all gifts made to UMass Memorial.

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**For Example:** An employee may be tempted to use his/her UMass Memorial issued laptop to download software found on the Internet to help out with UMass Memorial job tasks. However, placing outside information without authorization on a work laptop may compromise its software or other work documents, encryption may not be activated to protect your laptop, and any wireless remote access poses risk, too.

### Excluded Individuals and Other Ineligible Persons

UMass Memorial does not employ, contract with or bill for the services of individuals or organizations that are suspended, barred, excluded or ineligible to participate in federal health care programs or government contracting (inclusive of the Office of Inspector General and U.S. General Services Administration sanctions reports). It is the responsibility of the manager recommending the hiring of an employee or approval of any contract to ensure the prospective employee or vendor is not excluded from participation in federal health care programs or government contracting.



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Decisions related to sponsorship or support of outside organizations or activities must be approved by senior leadership.  
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*If you have questions, contact your Compliance Office (see Appendix for telephone number).*

### Document Retention, Security and Disposal

All records will be retained and, when appropriate, disposed in accordance with legal requirements and UMass Memorial policy. Records include paper documents such as letters and memos, computer-based information such as e-mail or computer files on disk or tape, and any other medium that contains information about the organization or its business activities. Institutional records or documents of any kind should not be removed from the premises unless approved in conjunction with policies and procedures.

### Subpoenas, Government Investigations and Litigation

Any covered individual that receives a subpoena or notice of a lawsuit or investigation, or has information that litigation or a government investigation involving UMass Memorial are anticipated should follow the UMass Memorial Medical Center Litigation/Investigation Document Hold Policy and the Service of Legal Process and Governmental Notices Policy, or the applicable policies at other entities.

*If you have questions, contact your Compliance Office or Office of the General Counsel (see Appendix for telephone number).*

**For Example:** If an employee receives a document or someone is trying to deliver a document that may relate to a lawsuit or investigation, the employee needs to follow the procedure in the UMass Memorial policy on service of process. A common example involves medical records. If someone is attempting to hand deliver subpoenas or court orders seeking medical records, the employee should direct the person to the Health Information Management Department/Medical Records Department. If an employee receives a document in the mail seeking medical records, it should be forwarded immediately to the same department.

## Political Activities and Contributions

UMass Memorial resources are not to be used for political purposes promoting or benefiting any candidate for office or any political party. Resources include financial (e.g., gifts, payments), human, and property or space for use in campaigning. Furthermore, as a tax-exempt organization, UMass Memorial is prohibited from engaging in any activity that is intended to support or oppose any candidate for public office.

Covered individuals may participate in the political process on their own time and at their own expense.

**For Example:** Interested in working on a candidate's election campaign to raise funds or make telephone calls? It is okay to do this on an employee's personal time with personal resources, but these activities should not involve UMass Memorial time, telephones, e-mail, faxes, copiers or other business property.



## Marketing Activities

Marketing materials should always accurately represent UMass Memorial Health Care and any of our member entities, and address the care, treatment and services that we provide either directly or by contractual arrangement.

UMass Memorial resources are not to be used for political purposes promoting or benefiting any candidate for office or any political party.

## Improving through Teamwork and Systems Thinking

The Code of Ethics and Business Conduct provides a framework for complying with applicable laws and UMass Memorial policies, and for accessing resources for guidance when necessary. While each covered individual is responsible for complying with policies and laws, often a team approach is required to ensure that organizationally, UMass Memorial remains compliant. Compliance requires teamwork and systems thinking, looking at the big picture and working together.

- Whenever possible, use team-based approaches to improving compliance
- Report violations and suspected violations
- Do not discourage others from reporting and never retaliate against those that report
- Look at the big picture when there is a violation
- Use a systems-based approach when a problem arises to help decrease compliance risk across the system
- Think of ways to help prevent future violations

Compliance is not orchestrated and implemented in an office. It is part of UMass Memorial organizational and individual culture, becomes part of our routine and is played out as part of each and every decision we make.

As a learning organization, it is incumbent on each of us to keep current on changes in policies and laws that impact our day-to-day responsibilities. As importantly, we each need to be resourceful in ensuring that we have access to appropriate interpretations of the law and answers to our questions. As we each become aware of changes, we should share our knowledge with the entire UMass Memorial community.

### Reporting of Violations

Covered individuals have an individual responsibility to come forward with any information regarding violation of this Code, UMass Memorial policies or applicable laws. Covered individuals are expected to cooperate fully in the investigation of any alleged violation of which they have knowledge. Reports may be made either in person, by telephone or in writing to any of the following. See the Appendix for specific telephone numbers.



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Covered individuals have an individual responsibility to come forward with any information regarding violation of this Code, UMass Memorial policies or applicable laws.

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- Your supervisor or responsible vice president
- Chief compliance officer
- Office of the General Counsel
- Chief medical officer
- **Compliance Office Confidential Reporting Line** (available to all covered individuals to discuss concerns about possible violations of the law or UMass Memorial policy)
- **Privacy and Information Security Line** (available to report privacy or information security related concerns)

### Protection from Retaliation

There will be no retaliation for good faith reporting of actual or possible violations of the Code. Any covered individual who deliberately makes a false accusation with the purpose of harming or retaliating against another covered individual will be subject to discipline. UMass Memorial will protect the identity of anyone reporting a violation to the extent permitted by law, unless doing so prevents UMass Memorial from fully and effectively investigating an alleged violation.

### Discipline for Violations

UMass Memorial will take appropriate disciplinary action, including dismissal when appropriate, against any covered individual who violates any applicable legal requirements or UMass Memorial policies.

## Questions Regarding the Code

Questions regarding the Code should be directed to the individual's supervisor or manager, or to those listed above under Reporting of Violations. Feel free to contact your Compliance Office with questions at any time (see Appendix for telephone number). Copies of compliance policies are available on the Compliance Office Intranet site or, by request, from the Compliance Office.

## Code of Ethics for the Chief Executive Officer, Presidents, Vice Presidents and Senior Financial Management

The chief executive officer, vice presidents and senior financial management are bound by all provisions of this Code and particularly those provisions relating to ethical conduct, conflicts of interest, compliance with applicable laws and internal reporting of violations of the Code. Senior financial management includes but is not limited to the UMass Memorial Health Care chief financial officer, corporate controller and director of financial reporting, and UMass Memorial member entity chief financial officers and controllers.

The CEO and senior financial management also have a responsibility for full, accurate and timely disclosure in all external reports and filings by the organization with governmental organizations, bondholders or other interested third-parties, and in other public communications.

In addition to the above, it is the responsibility of the CEO and each senior financial manager to promptly report to the chief compliance officer or the Confidential Reporting Line any information of which he/she may become aware that materially affects the integrity of disclosures made by the organization in its public communications. The CEO and each senior financial manager also is responsible for reporting promptly any information they may have concerning significant deficiencies in the design or operation of internal controls which could adversely affect the organization's ability to record, process, summarize or report financial data. The CEO and each senior financial manager also is responsible to report promptly any fraud, whether or not material, that involves management or other covered individuals who have significant roles in the organization's financial reporting, disclosures or internal controls.

Senior leadership or appropriate designees must determine appropriate corrective actions in the event of violation of the Code. Senior leadership must report these corrective actions to the Compliance Committee of the Board of Trustees.



Questions regarding the Code should be directed to the individual's supervisor or manager, or to those listed above under Reporting of Violations.

## Appendix

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# UMass Memorial Health Care, UMass Memorial Medical Center, UMass Memorial Medical Group and UMass Memorial Health Ventures

### Resources

Your manager or supervisor should always be a resource for you and can provide answers to your questions or point you in the direction of resources to help you understand UMass Memorial policies, procedures and practices related to the Code of Ethics.

Compliance Office Confidential Reporting Line . . .	508-770-1290
Privacy and Information Security Line . . . . .	508-334-5551
Privacy and Information Security E-mail . . . . .	privacyandsecurity@umassmemorial.org
Chief Compliance Officer . . . . .	508-334-0008
Chief Medical Officer . . . . .	508-334-6925
Compliance Office . . . . .	508-334-0008
Employee Assistance Program (EAP). . . . .	508-856-1327 or 800-322-5327
Equal Employment Opportunity Office (EEO). . . .	508-334-8729
Human Resources Department . . . . .	508-334-5072
Office of the General Counsel . . . . .	508-334-1700
Privacy Office . . . . .	508-334-5551
Risk Management Department . . . . .	508-856-2573
Safety/EHS Office (Memorial/ Hahnemann Campuses). . . . .	508-334-6508
Safety/EHS Office (University Campus). . . . .	508-856-3985
Security Office (Memorial/ Hahnemann Campuses). . . . .	508-334-6415
Security Office (University Campus) . . . . .	508-856-3296
Senior Director, Internal Audit . . . . .	508-334-9970

### Mission, Vision and Values

**Our Mission:** UMass Memorial is committed to improving the health of the people of Central New England through excellence in clinical care, service, teaching and research.

**Our Values:** Members of UMass Memorial are committed to:

- **Excelling at patient-centered care** – Achieving patient-focused excellence through the highest standards of quality care, patient safety and patient satisfaction
- **Acting with integrity** – Dealing honestly, fairly and responsibly with each other
- **Respecting one another** – Valuing the contributions, ideas and opinions of our coworkers, colleagues, patients and partners
- **Contributing to the community** – Partnering with the community at large and with other health care and social agencies in meeting the health needs of the community
- **Improving through teamwork and systems thinking** – Working to continuously improve ourselves, our processes and our patient services through cooperation and thinking as an integrated health care system
- **Embracing accountability** – Holding ourselves, our coworkers and our leaders to the highest standards of performance

## Clinton Hospital

### Resources

Your manager or supervisor should always be a resource for you and can provide answers to your questions or point you in the direction of resources to help you understand UMass Memorial policies, procedures and practices related to the Code of Ethics.

Compliance Office Confidential Reporting Line	.978-368-3714
Privacy and Information Security Line	.978-368-3714
Chief Compliance Officer	.978-368-3899
Compliance Office	.978-368-3899
Compliance Liaison	.978-368-3714
Employee Assistance Program (EAP)	.888-238-6232
Equal Employment Opportunity Office (EEO)	.978-368-3901
Human Resources Department	.978-368-3901
Office of the General Counsel	.508-334-1700
Privacy Office	.978-368-3714
Risk Management Department	.978-368-3714
Safety and Security Office	.978-368-3735

### Mission, Vision and Values

**Our Mission:** The mission of Clinton Hospital is to deliver high-quality comprehensive services with excellence, compassion and competence.

**Our Vision:** The vision of Clinton Hospital is to be the first choice for health care in our communities.

**Our Values:** Staff members of Clinton Hospital are committed to:

- **Integrity** – Earning the trust of our community, patients, physicians and staff
- **Dedication** – Putting those we serve first and contributing positively to our community
- **Excellence** – Maintaining the highest standards of performance in all we do
- **Adaptability** – Constantly innovating in response to changing needs
- **Listening** – Listening carefully to our community, patients, physicians and staff
- **Staff** – Recognizing that people are our most important asset, and promoting collaborative practice and teamwork

## Community Healthlink

### Resources

Your manager or supervisor should always be a resource for you and can provide answers to your questions or point you in the direction of resources to help you understand UMass Memorial policies, procedures and practices related to the Code of Ethics.

Compliance Office Confidential Reporting Line	.508-438-5578
Privacy and Information Security Line	.508-438-5578
Chief Compliance Officer	.508-860-1163
Compliance Manager	.508-438-5578
Chief Medical Officer	.508-860-1025
Compliance Office	.508-438-5578
Employee Assistance Program (EAP)	.508-856-1327 or 800-322-5327
Human Resources Department	.508-860-1122
Office of the General Counsel	.508-334-1700
Privacy Office	.508-438-5578
Risk Management Department	.508-860-1163
Safety/EHS Office	.508-860-1163
Security Office	.508-769-1728

### Mission, Vision and Values

**Our Mission:** Community Healthlink, Inc. is a multi-service, private, nonprofit organization committed to promoting, maintaining and restoring the dignity, well-being and mental health of individuals and families in Central Massachusetts.

## Central New England HealthAlliance

### Resources

Your manager or supervisor should always be a resource for you and can provide answers to your questions or point you in the direction of resources to help you understand UMass Memorial policies, procedures and practices related to the Code of Ethics.

Compliance Office Confidential Reporting Line . . .	978-466-4333
Privacy and Information Security Line . . . . .	978-466-2441
Chief Compliance Officer . . . . .	978-466-2005
Chief Medical Officer . . . . .	978-466-2005
Compliance Office . . . . .	978-466-2441
Employee Assistance Program (EAP) . . . . .	800-538-3543
Equal Employment Opportunity Office (EEO) . . . .	617-727-3990
Human Resources Department . . . . .	978-466-2224
Office of the General Counsel . . . . .	508-334-1700
Privacy Office . . . . .	978-466-2441
Risk Management Department . . . . .	978-466-4337
Safety/EHS Office . . . . .	978-466-2030
Security Office . . . . .	978-466-2013

### Mission, Vision and Values

**Our Mission:** The mission of HealthAlliance Hospital is to provide clinical and service excellence to individuals in our diverse communities through each stage of their lives.

**Our Vision:**

- Local Commitment
- National Acclaim
- To be nationally recognized for our outstanding care

**Our CARES Values:**

- **Commitment:** to our patients and communities.
- **Accountability:** for all we do.
- **Respect:** for one another.
- **Excellence:** in every encounter.
- **Service:** with a smile.

## Marlborough Hospital

### Resources

Your manager or supervisor should always be a resource for you and can provide answers to your questions or point you in the direction of resources to help you understand UMass Memorial policies, procedures and practices related to the Code of Ethics.

Compliance Office Confidential Reporting Line . .	508-486-5820
Privacy and Information Security Line . . . . .	508-486-5820
Chief Compliance Officer . . . . .	508-486-5809
Chief Medical Officer . . . . .	508-486-5723
Compliance Office . . . . .	508-486-5809
Employee Assistance Program (EAP). . . . .	508-486-5400
Equal Employment Opportunity Office (EEO). . . .	508-486-5400
Human Resources Department . . . . .	508-486-5400
Office of the General Counsel . . . . .	508-334-1700
Privacy Office . . . . .	508-486-5809
Risk Management Department . . . . .	508-486-5518
Safety/EHS Office. . . . .	508-486-5581
Security Office . . . . .	Page via Operator

### Mission, Vision and Values

**Our Mission:** The mission of Marlborough Hospital is to improve the health of the individuals and the community we serve as an integral part of the UMass Memorial Health Care system.

**Our Vision:** The vision of Marlborough Hospital is to be

recognized as a leading community hospital in the United States.

**Our Values:** The values that define the Marlborough Hospital culture:

- Caring
- Integrity
- Respect
- Commitment
- Leadership
- Excellence

## Wing Memorial Hospital and Medical Centers

### Resources

Your manager or supervisor should always be a resource for you and can provide answers to your questions or point you in the direction of resources to help you understand UMass Memorial policies, procedures and practices related to the Code of Ethics.

Compliance Office Confidential Reporting Line	. 413-284-5249 or 800-880-9464
Privacy and Information Security Line	. . . . . 413-284-5760
Chief Compliance Officer	. . . . . 413-284-5249
Chief Medical Officer	. . . . . 413-284-5210
Compliance Office	. . . . . 413-284-5249
Employee Assistance Program (EAP)	. . . . . 413-284-5304 or 800-451-1834
Equal Employment Opportunity Office (EEO)	. . . . . 413-284-5304
Human Resources Department	. . . . . 413-284-5304
Office of the General Counsel	. . . . . 508-334-1700
Privacy Office	. . . . . 413-284-5760
Risk Management Department	. . . . . 413-284-5297
Safety Department	. . . . . 413-284-5297
Security Office	. . . . . 413-284-5345

### Mission, Vision and Values

**Our Mission:** The mission of Wing Memorial Hospital and Medical Centers is to provide integrated, community-oriented, culturally sensitive quality health care to the diverse people of our service area by:

- Emphasizing programs that promote good health
- Providing superior clinical services
- Offering health care resources to the community at large

**Our Vision:** Our vision is to continue to be the provider-of-choice of primary and acute care community hospital services for our primary service area through the year 2011. In accordance with our vision, we define “provider-of-choice” as:

- Providing an appropriate array of high-quality patient-focused clinical services
- Improving our highly competitive market position within our primary service area

- Developing an accessible provider network of physicians and other caregivers that supports the needs of our patients
- Demonstrating responsibility in achieving the financial performance needed to accomplish our mission
- Improving and expanding the facility and embracing innovation to meet the needs of the community at large
- Developing innovative ways to recruit and retain a workforce that is competent, compassionate and motivated to fulfill the mission of Wing Memorial Hospital and Medical Centers

**Our Values:** Members of Wing Memorial Hospital and Medical Centers are committed to:

- **Excelling at patient-centered care** – Achieving patient-focused excellence through the highest standards of quality care, patient safety and patient satisfaction
- **Acting with integrity** – Dealing honestly, fairly and responsibly with each other
- **Respecting one another** – Valuing the contributions, ideas and opinions of our coworkers, colleagues, patients and partners
- **Contributing to the community** – Partnering with the community at large and with other health care and social agencies in meeting the health needs of the community
- **Improving through teamwork and systems thinking** – Working to continuously improve ourselves, our processes and our patient services through cooperation and thinking as an integrated health care system
- **Embracing accountability** – Holding ourselves, our coworkers and our leaders to the highest standards of performance





UMass Memorial Health Care is the largest not-for-profit health care system in Central Massachusetts with 1,500 physicians and more than 12,000 employees. Our comprehensive network of care includes teaching hospitals, affiliated community hospitals, outpatient clinics, community-based physician practices, and home health, hospice, rehabilitation and mental health services. UMass Memorial is dedicated to promoting health and wellness in the community, and is proud to be the clinical partner of the University of Massachusetts Medical School.

Contributions and memorial gifts to UMass Memorial Health Care are deeply appreciated. For information, call the UMass Memorial Foundation at 508-856-5520 or e-mail to [giving@umassmed.edu](mailto:giving@umassmed.edu).

