

**SIGNATURE HEALTHCARE
ADMINISTRATIVE POLICY MANUAL**

Subject: Code of Conduct & Ethics		Page 1 of 4
Effective Date: 9/97	Revised Date: 2/98, 7/00, 6/06, 7/09, 3/21, 11/22, 2/24, 5/24	Classification Code: 100.006
Reviewed Date: 4/24		
References: MGL Chapter 111, S.70E, DPH Advocacy Office, Medicare Conditions of Participation	Policy Section: I – Administration Issuing Department/Committee: Compliance	

PURPOSE: Signature Healthcare Corporation, Signature Healthcare Brockton Hospital, Signature Medical Group (“SHC”) is dedicated to providing excellent care to the community it serves. To ensure that integrity is maintained in the pursuit of our mission, SHC maintains an ethical environment in all aspects of its operations. The following guidelines are intended to ensure that:

- an organizational Code of Conduct & Ethics is in place
- ethical principles are clearly defined, communicated and reinforced
- mechanisms to monitor effectiveness of the organization’s Code of Conduct & Ethics are available

RESPONSIBILITY: All managers, associates, members of the Medical Staff and volunteers are expected to maintain the highest level of personal and business ethics in all interactions with patients, their families or caretakers, vendors, colleagues, and the communities we serve.

POLICY:

1. Admissions, Discharges and Transfers

- a. Admission to Signature Healthcare Brockton Hospital and any other SHC facilities will be based upon the medical needs of the patient and will not be influenced by race, age sex, sexual orientation, religion, national origin, disability or source of payment.
- b. Patients will be discharged from Signature Healthcare Brockton Hospital only when it has been determined by a physician that their medical needs can be met in a more appropriate setting. Third party payors may determine whether or not care is paid for, only medical professionals may determine when the patient is able to be safely discharged from the hospital. (Discharge Planning 100.904; Perinatal Services Early Discharge of Mother and Newborn 200.210; On-Site Utilization & Case Management Review Policy 400.510;
- c. Patients will be transferred to other facilities based upon their medical needs, requirements of their insurer, or at the patient’s request. If a needed service is not available at Signature Healthcare Brockton Hospital, transfer may be arranged at the discretion of the physician in charge of the patient’s care. When a patient no longer requires the intensity of services provided by Signature Healthcare Brockton Hospital, transfer to a lower level of care may be arranged with the approval of the attending physician. When a patient requests to transfer to another facility, that request will be honored.

In all instances, transfer will only be-- initiated if the patient is stabilized for transport (unless the potential medical benefits outweigh the risk of transfer in extreme situations) and a physician at the receiving institution has agreed to be responsible for the care of the patient.

2. Billing and Collection Practices

- a. Billing to third party payors, patients and guarantors will be prompt, accurate and include only charges for services rendered to the patient.

**SIGNATURE HEALTHCARE
ADMINISTRATIVE POLICY MANUAL**

Subject: Code of Conduct & Ethics

Page 2 of 4

- b. Patients and families will be provided with explanation of any charges upon request. Any discrepancies between services rendered and billed will be investigated and explained.
- c. Collection practices will meet federal and state regulations regarding debt collection.

3. Public Relations and Marketing Practices

- a. SHC will adhere to all state and federal regulations which govern competitive behavior and business practices, and with American Hospital Association Guidelines.
- b. SHC will at all times ensure accurate representation of facts and circumstances to the community it serves. All communications will be designed to inform and persuade but not to deceive or mislead. All marketing materials will reflect accurate representation of information, including on accreditation and licensure.
- c. The privacy and confidentiality of patients' information will be maintained in any public relations and marketing efforts undertaken by SHC.

4. Conflict of Interest

- a. All senior management, department managers, certain employees, and physicians having contractual relationships with SHC or receiving any remuneration from SHC or its affiliates, members of the Board of Trustees and members of the Medical Executive Committee are required to disclose, in writing, any interests or activities in which they are involved or become involved that could conflict with the interests or activities of SHC and shall obtain approval from SHC leadership prior to commencing, continuing or consummating any activity or transaction which raises a possible conflict of interest.
- b. Disclosure of potential conflicts of interest shall be made annually; issues, which arise in the interim, must be raised at the time of their occurrence.

5. Proprietary Information and other Hospital Assets

- a. Managers, associates, members of the Medical Staff and volunteers are expected to protect SHC assets, including confidential and proprietary information.
- b. All SHC assets are to be used solely for authorized, SHC/Hospital-related activities and are not to be subject to misuse or abuse.

6. Patient Rights

- a. All patients, regardless of age, sex, sexual orientation, national origin, religion, disability, gender identity, veteran's status, or ability to pay are afforded the rights mandated by Federal and Massachusetts laws and accepted professional practice. This applies to all managers, employees and members of the Medical staff and in all SHC settings.
- b. Patients (or their representatives) have the right to refuse treatment, withhold, or withdraw treatment within the limits of the law of the Commonwealth of Massachusetts.

**SIGNATURE HEALTHCARE
ADMINISTRATIVE POLICY MANUAL**

Subject: Code of Conduct & Ethics

Page 3 of 4

7. Ethical Decision Making

- a. Ethical dilemmas, which arise in the care and treatment of patients, are resolved on a case-by-case basis; by the consulting attorney, appropriate medical and nursing personnel, as well as outside experts, the patient and/or family members participate in the resolution as appropriate. Documentation of the outcome of the resolution is contained in the medical record.
- b. An Ethics Committee serves as a resource to SHC in ethical matters. The Committee is charged with the responsibility of recommending policy in the area of ethics and patient rights, monitoring organization wide performance of processes that pertain to ethics and patient rights, and educating medical staff and other professionals regarding current thinking in ethical matters.

8. Conflict Resolution

- a. Signature Healthcare Brockton Hospital is committed to improving patient care and customer satisfaction. This is partially accomplished through a systematic approach to responding to complaints initiated by patients, patient's families and visitors.
- b. Patients receive instructions on how to file a complaint in their admission packet and are given additional information and assistance upon request. The hospital patient representative will meet with patients and their family in an attempt to resolve complaints and/or bring them to the appropriate management team person.
- c. In addition, the employee grievance procedure is designed to provide the employee with an acceptable means of expressing concerns and suggestions and thereby resolving matters in a fair and equitable manner.

9. Promotion of a Safe and Respectful Environment

- SHC is committed to upholding a Code of Conduct & Ethics to maintain a safe, inclusive, equitable, and respectful environment for patients, staff, and visitors.
- SHC is committed to the creation of policies and practices that promote the protection of staff, patients, and visitors.
- SHC's "WeCare" values and service standards provide a foundation for how SHC staff and providers interact with each other every day.
- SHC understands a safe environment promotes patient, visitor, and staff safety.
- And that offensive, abusive, or discriminatory language or behavior undermines the safety of patients and staff.

10. Code of Conduct & Ethics Violations, May Include, But Are Not Limited to:

- Disrespectful, aggressive, abusive, or violent behaviors or actions towards staff, patients, and visitors.
- Threatening, discriminatory, bullying, disrespectful, or offensive language towards staff, patients, and visitors.
- Possession of weapons or firearms.
- Disruption of other patients' care or experience.

**SIGNATURE HEALTHCARE
ADMINISTRATIVE POLICY MANUAL**

Subject: Code of Conduct & Ethics

Page 4 of 4

- Taking photos or videos of patients, visitors, and/or staff without permission.

11. Potential Consequences

- All violations of the Code of Conduct & Ethics will be addressed by SHC management/staff per policies and procedures.
- Patients violating the Code of Conduct & Ethics may be asked to continue their care plan elsewhere and their future ability to obtain non-emergent care at SHC/Brockton Hospital may require further review.
- Anyone found violating the Code of Conduct & Ethics may be asked to leave and future visits may be restricted.
- SHC may report violations of personal conduct to appropriate authorities.

12. Maintenance of Code of Conduct & Ethics

- Alert members of your care team if you witness or are a victim of behaviors or actions that violate the Code of Conduct & Ethics
- Retaliation for reporting a violation is prohibited.
- Staff will report all observed or experienced violations of the Code of Conduct & Ethics to the appropriate individual or offices per SHC's violence prevention policy.

SHC maintains an ethical environment in all aspects of its operations and practices.

REVIEWED BY:

Chief Compliance Officer
SVP Chief Legal Officer
Administrative Policy Committee
Medical Executive Committee

DATE:

5/24
5/24
3/24
4/24