



YALE NEW HAVEN HEALTH

CODE OF CONDUCT

VALUES AT WORK



A Letter
from
Marna P.
Borgstrom

Dear Colleagues,

Yale New Haven Health System is a leader in providing safe, high-quality, comprehensive patient care. We are committed to service excellence in our day-to-day interactions with our patients and their families, our visitors, other staff members and the communities we serve.

The underlying foundation of our work is ethical behavior – beyond that we rely on our education, training, experience and personal dedication. However, in our daily activities, we sometimes face new and difficult situations that raise questions about values at work – such as patient confidentiality, conflicts of interest or financial reporting. For this reason, we need a thorough understanding of our hospital policies, the rules and regulations that govern our work, and the ethical implications of our actions and decisions.



The Yale New Haven Health System Code of Conduct reflects our commitment to ethical business behavior, provides guidelines for making informed decisions, and presents an overview of the policies to which we must all adhere.

If you are unsure about an issue or concerned about a possible violation, your hospital's corporate compliance officer will provide guidance or clarification. Or, if you are still unsure, you may call the compliance hotline at **1-888-688-7744** or go to the Corporate Compliance/Privacy website at the address below.

Thank you for your continued commitment to providing safe, high quality care to the patients we are privileged to serve.

Sincerely,

A handwritten signature in black ink that reads "Marna P. Borgstrom" with a horizontal line extending to the right.

Marna P. Borgstrom
President and CEO

www.ynhhscomplianceprogramhotline.com

MISSION

Yale New Haven Health System, through its Bridgeport, Greenwich, Yale-New Haven and Northeast Medical Group Delivery Networks, provides comprehensive, cost-effective, safe, advanced patient care characterized by clinical and service quality.

Yale New Haven Health System, in affiliation with Yale School of Medicine and other universities and colleges, educates health professionals and advances clinical care. In all of its work, YNHHS is committed to the communities it has the privilege of serving.



VISION & VALUES

To be the preferred, comprehensive health system recognized for excellence in advanced patient care, safety, clinical quality, service, cost effectiveness and leadership in advancing healthcare reform.

In carrying out its mission and working towards its vision, Yale New Haven Health System is guided by the following values:

EXCELLENCE

in service to customers, which requires up-to-date knowledge, service, skilled performance, and ensures a safe environment

COMPASSION

for the needs which bring people to us, requiring all employees to be sensitive, responsive and respectful of each person's unique circumstance

COST-EFFECTIVE PERFORMANCE

which provides full value to our patients, their families and other customers, only rendering care which is necessary, appropriate and effective

FAIRNESS

for everyone, assuring access to all services, staff appointments, and employment and procurement opportunities without discrimination

INTEGRITY

in all interactions, both personal and organizational, reflecting our obligation to the truth and our commitment to honesty

LEADERSHIP

as a provider of services which respond to community need and contribute to improving the health of our communities, as a model employer and corporate citizen

WHY WE HAVE A CODE OF CONDUCT

Our Code of Conduct reflects our collective commitment and our responsibility to uphold our organization's reputation, practice ethical business behavior, meet rigorous professional standards, and comply with the laws, regulations and policies that govern our work. The Yale New Haven Health System (YNHHS) Code of Conduct applies to every individual associated with YNHHS, whether employee, volunteer, member of the Medical Staff or Auxiliary at the Health Services Corporation or the Bridgeport, Greenwich, Yale-New Haven and Northeast Medical Group Delivery Networks.



YALE NEW HAVEN HEALTH

WHAT THE YALE NEW HAVEN HEALTH SYSTEM CODE OF CONDUCT PROVIDES

An overview
of the
commitments
that govern
our work

Tools for
reporting concerns
or suspected
violations without
fear of retaliation

Guidance in
making choices
that may seem
questionable
or confusing

Yale New Haven Health System

CORPORATE COMPLIANCE PROGRAM

Our Corporate Compliance Program is designed to enhance our understanding of acceptable behavior and appropriate decision-making.

It is everyone's duty to promptly report any activity that appears to violate the Code of Conduct or any laws, regulations or organizational policies.

All YNHHS relevant compliance/privacy policies can be found on the intranet.

What should you do if you suspect a violation of our values and commitment?

Go to the System intranet or any of the four delivery network intranets.

In the blue bar on the top of the home page, click on

Corporate Compliance/Privacy

<http://intranet/ynhhs/opcc/Default.aspx>

or

Ask your Department Director for a printed version.

If you wish to obtain guidance on ethics or compliance issues, or if you are unsure about reporting a suspected violation, you may take any of the following actions:

Contact your direct supervisor.

or

Voice your concern at the next supervisory level up to and including the highest level of management.

or

Contact the Human Resources Department if the issue involves a human resource concern such as work conditions, discrimination or harassment, theft or abuse of property and personal security.

or

Contact the YNHHS Compliance Officer (203) 688-3369
or your own Compliance Officer
Bridgeport Hospital – (203) 384-3870
Greenwich Hospital – (203) 863-3783
Northeast Medical Group – (203) 688-3369
Yale-New Haven Hospital – (203) 688-3369

or

To make an anonymous report, call the Compliance Hotline at [1-888-688-7744](tel:1-888-688-7744) or visit the Corporate Compliance/Privacy website at www.ynhhscomplianceprogramhotline.com

COMMITMENT

YNHHS Code of Conduct articulates our commitment to our values and ethical business behavior while reminding us that our overriding responsibility is to use sound judgment and personal integrity.

It is the responsibility of each of us to understand and comply with the organizational policies and procedures emanating from our Code of Conduct.



WE ARE COMMITTED TO:

ETHICALLY TREATING:

PATIENTS AND THEIR FAMILIES

We are committed to providing safe, high quality medical care with respect for the privacy and the dignity of the patients and in recognition of the importance of our patients' families. We recognize the need to maintain patient confidentiality, and we will use our best efforts to assure that no information is shared in an unauthorized manner.

EMPLOYEES

We are committed to honesty, fairness, the provision of a safe and healthy environment and respecting each person's dignity.

SUPPLIERS AND VENDORS

We are committed to ethical business practice and fair competition. We choose vendors objectively to provide the products and services that best meet our organization's need.

DONORS

We respect and honor our donors' generosity and the intent of their donations.

COMMUNITY

We are responsible neighbors, collaborating with other groups to improve the health status of our communities. We protect the environment in which we are located and comply with appropriate environmental laws.

VOLUNTEERS

We respect and appreciate our volunteers' service and generosity.

MEDICAL STAFF & OTHER HEALTHCARE PROVIDERS

We are committed to providing the resources required for safe, high quality care, with honesty, fairness and respect for the competence of our caregivers.

We will abide by all laws relating to making or accepting patient referrals.

PAYORS

We seek appropriate payment for services provided in compliance with the law and with appropriate documentation.

We honor all contracts.

WE ARE COMMITTED TO:

KNOWING AND ADHERING TO OUR ORGANIZATIONAL POLICIES & THE LAW

We perform our work in compliance with all applicable laws, regulations and our organization's policies and procedures. We are responsible for knowing and complying with the legal requirements relevant to our jobs. We appropriately report any suspected wrong-doing and cooperate with activities and investigations which are conducted to ensure compliance.

OBJECTIVE DECISION-MAKING / AVOIDING CONFLICTS OF INTEREST

We make objective decisions and avoid participation in any decision in which we have a self-interest. We are conscious of the appearance of being unduly influenced in any decision. The most important word to remember when it comes to conflicts of interest is "disclose." We have the obligation to be open and candid in our dealings on behalf of YNHHS.

APPROPRIATELY USING ORGANIZATIONAL ASSETS AND INFLUENCE

We recognize the community has entrusted us with the responsibility and resources to provide safe, high quality health care. We safeguard, invest and use assets to achieve the mission of our organization.

We use YNHHS resources for the benefit of YNHHS only, and it is an organizational decision, supported by the leadership of the System or one of its Delivery Networks, to sponsor or support any outside organization or activity.

APPROPRIATELY GIVING OR RECEIVING GIFTS

We neither accept nor give gifts or other forms of remuneration to induce the referral of patients or influence the purchase or selection of products and services.

We abide by our organizational policies on acceptable gifts and entertainment.

KEEPING ACCURATE AND COMPLETE RECORDS

We follow established procedures to ensure the accuracy and reliability of our financial reports. We report information promptly and accurately to all regulatory agencies, payors and others. All patient records include the documentation required for quality care and to comply with reimbursement regulations.

Patient records and information are treated confidentially, as required by law.

Calling the Compliance Hotline

If you feel uncomfortable about your activities or those of others around you and feel hesitant about making a report in person, call the 24-hour Compliance Hotline at **1-888-688-7744** or make a report on the Corporate Compliance/Privacy website at **www.ynhhscomplianceprogramhotline.com**.

The Hotline is outsourced to an independent company that has trained, professional personnel available to speak with you.

You are not required to identify yourself.

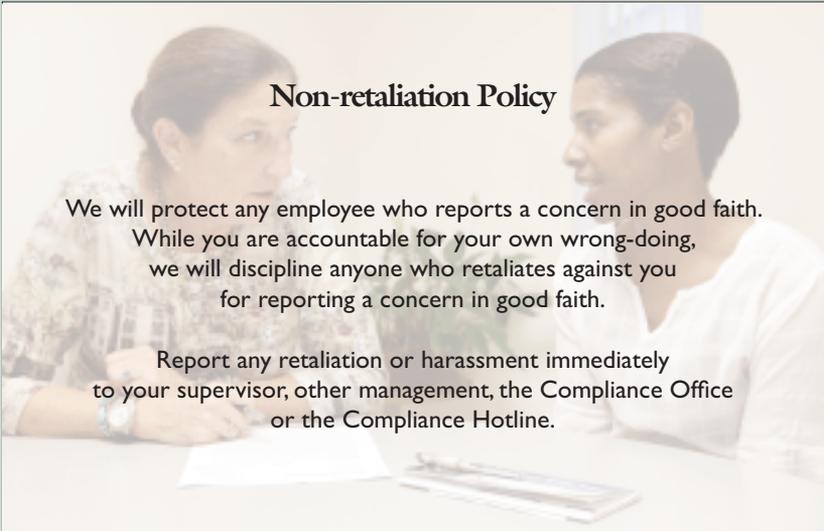
The Hotline is not set up for caller ID and cannot trace calls.

However, you may decide to identify yourself in order to provide information that may be necessary in an investigation.

Information you provide will remain confidential to the extent possible.

You will be given a case number and a call back date.

You may call back again on or after the call back date to determine whether action has been taken, but the nature and outcome of an investigation is always confidential.



Non-retaliation Policy

We will protect any employee who reports a concern in good faith.

While you are accountable for your own wrong-doing, we will discipline anyone who retaliates against you for reporting a concern in good faith.

Report any retaliation or harassment immediately to your supervisor, other management, the Compliance Office or the Compliance Hotline.



YALE NEW HAVEN HEALTH



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System Compliance Office:
(203) 688-8416