

# Our Standards of Conduct



SAFETY   QUALITY   SERVICE   PEOPLE   FINANCE   GROWTH   COMMUNITY

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**A message to the Memorial family  
from President and Chief Executive  
Officer**

Memorial Healthcare System is committed to conducting its business in accordance with the highest legal and ethical standards.

In July 1997, Memorial established the Corporate Compliance Program to demonstrate its commitment to excellence in legal, regulatory and ethical compliance and to ensure that it has established a culture that promotes self-monitoring, detection and resolution of problems. To help Memorial's employees and managers identify and prevent improper conduct, Senior Management and the Board of Commissioners have adopted Memorial Healthcare System's Compliance Program Standards and Procedures, of which the Code of Conduct is a critical component.

While the Standards and Procedures provide the framework of the Compliance Program, the Code of Conduct establishes the general principles that guide all Memorial business and that all employees are expected to follow as a condition of employment.

In healthcare, we are faced with many issues requiring us to exercise sound judgment and common sense. As Memorial employees, we are expected to maintain the outstanding reputation we have earned by demonstrating honesty and integrity in all of our actions.

Not only will Memorial Healthcare System be a world-class model of excellence as a fully integrated, quality and cost-effective healthcare system, it will also be a world-class model for honesty and integrity.

Please take the time to acquaint yourself with Memorial's Code of Conduct and other elements of the Compliance Program as presented here.

President and Chief Executive Officer

Deeper **Caring.**  
**Smarter** Healthcare.

## Mission Statement

Heal the body, mind and spirit of those we touch.



## Vision Statement

To be a premier clinically integrated delivery system providing access to exceptional patient- and family-centered care, medical education, research and innovation for the benefit of the community we serve.

# A Commitment to Doing the Right Thing

## **Compliance with All Laws and Regulations**

We comply with all federal, state and local laws and government regulations, and must immediately and directly report to the Compliance Office any actual or perceived violation of this Code of Conduct, the Corporate Compliance Program or any other Memorial policy.

The Corporate Compliance Program strives to summarize legal issues in general terms intended for a layperson. These general statements are intended to raise our awareness, but are not intended to replace the advice of counsel, or to address all situations and circumstances. They are also not intended to impose on us any standards greater than those required by law. Further, this Corporate Compliance Program is intended to summarize and supplement other standard practices of Memorial Healthcare System and rules and regulations of its hospitals and operating departments.

## **Compliance with All Memorial Policies and Procedures**

We comply with all Memorial policies and procedures included in the Standard Practice and Policies and Procedures Manuals, including, but not limited to, all equal employment

opportunity policies, Family Medical Leave Act policies, Americans with Disabilities Act policies, compensation policies, harassment policies and Fair Labor Standards Act policies.

## **Supervisors and Managers**

Memorial supervisors and managers are held to a higher standard and have a special responsibility to lead by example. They are responsible for making sure that their work areas reflect Memorial's values.

Supervisors and managers are expected to be open to employee concerns about ethics and compliance. They need to create a work environment in which concerns can be raised and openly discussed without fear of retaliation. Even if an employee has criticisms or raises an uncomfortable question, supervisors and managers must welcome the communication, always remembering that openness is essential to a healthy work environment.

## **Non-Retaliation**

When someone raises a good-faith concern, calls Memorial's Compliance Hotline or cooperates with an investigation of possible ethics or compliance violations, retaliation against that person is prohibited. Memorial takes reports of retaliation very seriously. If retaliation occurs, it will result in discipline, up to and including termination of employment.

Doing the  
Right  
Thing.

# Q&A

## Who is this Code of Conduct for?

This Code of Conduct establishes the general policies and procedures that all Memorial employees, volunteers, physicians and vendors must follow.

## Are these policies meant to cover all situations?

No. These policies and procedures are not meant to cover all situations. Questions as to the legality or ethics of particular conduct in a particular situation, whether or not the situation is described within this Code of Conduct, should be submitted either to your immediate supervisor or to Memorial's Legal Department or Compliance Office.

## What do we have to do?

As Memorial's reputation is the sum of the reputations of its employees, it is critically important that all of its employees perform their duties in accordance with legal and ethical standards. Every Memorial employee is required to understand and comply fully with both the rules and approval procedures established by this Code of Conduct. The standards of conduct apply to all Memorial employees regardless of rank or types of duties. In addition, promotion of and adherence to this Code of Conduct and to the Corporate Compliance Program will be one measure of performance of employees, supervisors, managers, directors and

officers. To the extent that any additional policies are set forth in any other Memorial manual, those policies should be consistent with this Code of Conduct. In case of any inconsistency, this Code of Conduct shall govern.

## What are the goals of Memorial's Corporate Compliance Program?

The Compliance Program's goals are to:

- Safeguard Memorial's tradition of strong moral, ethical and legal standards of conduct
- Provide Memorial with an accurate view of its employees' behaviors
- Identify and ferret out criminal and unethical conduct
- Create a compliance plan for efficient dissemination of information relating to changes in government requirements, and
- Establish an organizational structure that encourages employees to freely report concerns

## What is Memorial's responsibility?

Memorial will exercise due diligence in attempting to deter, detect and correct improper conduct by its employees or managers. Memorial will establish an environment or culture that promotes self-monitoring, detection and resolution of problems.

Memorial's reputation  
is the sum of the  
reputations of its  
employees.





# A Commitment to Our Patients

## Memorial's Patients' Rights Statements

We recognize the rights and obligations of patients as set forth in Memorial Healthcare System's Patients' Rights Statements. Memorial employees also should be guided by all patient-care policies governing patient care, including, but not limited to, Memorial Healthcare System's Standard Practice Manuals, Nursing Policy and Procedure Manuals, and departmental Policy and Procedure Manuals.

## Quality of Service

We are committed to providing services that meet all contractual obligations and Memorial Healthcare System's quality standards.

## Emergency Care

We will provide treatment to all individuals who have an emergency medical condition. System employees do not delay the treatment or the provision of an appropriate medical screening in order to inquire about the individual's method of payment or insurance coverage. Individuals may only be transferred from Memorial Healthcare System to another facility when that facility has accepted the transfer.

## Advance Directives and Patient Rights

We comply with all system policies and procedures and federal and state laws and regulations governing advance directives and patients' rights.

## Confidential Information

We safeguard all confidential information as required by law. We protect the confidentiality of all patient records and the information contained in such records in accordance with Memorial Healthcare System's Privacy Program. In addition, we respect and protect the confidential nature of personal information of other employees,

peer review information, trade secrets, and communications privileged as attorney/client or clergy information.

## Patient Records

We make every effort to ensure that entries we make into patient records are clear and complete, and reflect exactly the item or service that was provided to the patient. We strive to ensure that our records never include guesswork, exaggerations or miscoding. If we change a record, we note the change in the manner in which our internal policies require.

## Just Culture

We foster a culture that rewards reporting and puts a high value on open communication – where risks are openly discussed between managers and staff. However, we also recognize that while we as humans are fallible, we generally have control of our behavioral choices, whether we are an executive, a manager or a staff member. We understand the concept of shared accountability – that good system design and good behavioral choices of staff together produce good results.

## Patient- and Family-Centered Care

We make every effort to create partnerships among healthcare practitioners, patients and families that will lead to the best outcomes and enhance the quality and safety of healthcare. We focus on treating patients and their family members as partners on the care team. We make every effort to provide flexible visiting hours and in-depth information sharing to help families make decisions about current and continuing healthcare.





## Ask yourself:

1. Do I always treat patients with respect and dignity?
2. Am I careful not to let my feelings or circumstances interfere with patient care?
3. Do I avoid discussing patient information in public areas?
4. Am I careful not to leave patient files, reports or other information in areas that could be viewed by the public?



**“That  
just didn’t  
seem right.”**

If what we see appears to be inappropriate care or treatment of a patient, we commit to reporting it. If a situation does not seem right – even where the Code does not specifically address it – we have an obligation to report it to our supervisor, Human Resources, the Compliance Department or the Compliance Hotline.

# A Commitment To Each Other

## Respect

We support Memorial's equal opportunity employment and other employee development programs. We embrace the diversity of our co-workers, and never discriminate or harass on the basis of race, ethnicity, religion, gender, sexual orientation, national origin, age, disability, veteran status or any other characteristic protected by law. If we need to access employee information as part of our jobs, we will do so only when necessary for our work.

## Positive Work Environment

Each Memorial employee has the right to work in a positive environment. We do not tolerate conduct that disrupts our work environment, including behavior that is disrespectful, hostile, violent, intimidating, threatening or harassing. Harassment can be particularly harmful to the work environment, and thus we have a special responsibility to report any instances of it that we may see or of which we become aware. Requests for sexual favors, sexual advances, and other unwelcome verbal or physical conduct of a sexual nature are expressly prohibited. We should speak up if a co-worker's conduct makes us feel uncomfortable.

## Standards of Behavior for Championship Customer Service

We recognize that exceeding the customer's expectations is central to the culture and operating philosophy of Memorial Healthcare System. We acknowledge our role in providing Championship Customer Service, and we accept responsibility for assuring that our behavior always complies with

these standards.

We are committed to excellence in the provision of high-quality customer service. We recognize how important Championship Customer Service is to the success of Memorial Healthcare System and our role as essential members of the healthcare team.

We exhibit behavior that supports and upholds the Standards of Behavior for Championship Customer Service at all times.

## Health and Safety

We follow the health and safety policies and regulations that apply to our work. This includes following procedures for handling hazardous materials and related situations. If we see an injury or accident, or a dangerous situation, we will immediately report it to our supervisor, the Safety Officer or the Compliance Hotline. We access and handle prescription drugs, controlled substances and other medical supplies only as authorized, and administer them by physician order only. We may not use, possess or be under the influence of alcohol or illegal drugs on company property or during work time.

## Legal Employment

We maintain all credentials, licenses and certifications that are necessary to perform our jobs. We do not hire, contract with, or bill for services rendered by persons or entities excluded from participating in the federal healthcare programs by the Department of Health and Human Services or the U.S. General Services Administration. If we become ineligible ourselves, or are convicted of a crime that could lead to becoming ineligible (such as one related to the provision of healthcare), we

**“But I was  
only  
joking.”**

What may seem funny to you can be very hurtful to others. Telling degrading or humiliating jokes or jokes that pick on a specific group (race, religion, gender, etc.) can be very painful to others, even if that's not the intent. To respect each other means to be sensitive about what we say and how we say it, and taking the feelings of others into consideration.



## Ask yourself:

will inform the Compliance Office.

### Charging of Costs/Time Reporting

We are careful to submit time reports that are complete, accurate and timely. We are careful to ensure that hours worked and costs incurred are applied to the department and/or account for which the effort was required.

When a supervisor approves of a time report or expense report, he or she represents that it has been reviewed, and that steps have been taken to verify the validity of the hours or expenses reported and the correctness of the allocation of the hours or expenses. Supervisors must not tolerate or condone deviations from appropriate time reporting or cost-charging practices. Accordingly, supervisors must not set goals for subordinates that cannot be met through accurate, honest, and appropriate time reporting or cost charging practices.

### Refraining from Substance Abuse

Memorial is committed to providing employees and customers with a working environment that is free from problems caused by the use and abuse of controlled substances and the abuse of alcohol.

The consumption, possession, sale or purchase of alcohol on Memorial property is prohibited, with the exception of events approved in advance by management in approved conference, meeting or recreational facilities. Memorial also prohibits the use of alcohol by employees, either directly before or during the workday, whether in connection with business or on personal time. If an employee is found to be in violation of this policy, management will determine the appropriate disciplinary action, which may include termination.

### Behaviors that Undermine a Culture of Safety

Intimidating and disruptive behaviors include overt actions as well as passive activities. Examples include:

- Verbal outbursts
- Inappropriate loudness
- Physical threats
- Refusing to perform assigned tasks
- Quietly exhibiting uncooperative attitudes during routine activities
- Reluctance or refusal to answer questions, return phone calls or pages
- Condescending or demeaning language or tone
- Profane or disrespectful language
- Impatience with questions
- Throwing objects
- Criticizing others in front of patients or other staff
- Deliberate failure to adhere to organizational policies without adequate justification

Overt and passive behaviors undermine team effectiveness and can compromise the safety of patients. Intimidating and disruptive behaviors are unprofessional and will not be tolerated.

# A Commitment To Our Business Partners

## Contract Negotiation

We are committed to disclosing current, accurate and appropriate information while negotiating contracts with our business partners. Employees involved in the pricing of contract proposals or the negotiation of contracts are committed to ensuring the appropriateness of all data generated and representations made to customers and suppliers, both government and commercial.

## Antitrust and Trade Laws

We are committed to complying with applicable antitrust, trade and similar laws that regulate competition.

## Ineligible Persons

We will not employ, contract with, or bill for services rendered by an individual or entity that is excluded or ineligible to participate in federal healthcare programs; suspended or debarred from federal government contracts; or who has been convicted of a criminal offense relative to the provision of healthcare items or services, provided that we are aware of such criminal offense. We understand our individual accountability to report if we become excluded, debarred or sanctioned by a federal healthcare program, or have been convicted of a criminal offense related to the provision of healthcare products or services.

## False Claims Laws

We understand that there are federal and state laws that prohibit us from offering payments or items of value to induce a customer or potential customer to purchase services from us or to refer a patient to us. In addition, we understand that there are laws that prohibit the filing of false claims. As these are highly complex areas of the law, we take special care in this area, and promptly refer any questions to the Compliance Office, or to Memorial's legal counsel.

Examples of the types of actions that could violate the federal and Florida False Claims Acts and other federal false billing laws include:

- Filing a claim for services that were not rendered at all or were not rendered as described on the claim form
- Filing a claim for services that were rendered, but were medically unnecessary
- Submitting a claim containing information you know to be false, or
- Misusing Social Security or Medicare symbols, emblems or names in marketing

We are committed to being knowledgeable of and complying with all of the applicable laws, rules and regulations of all governmental agencies.

## Billing and Reimbursement

We are committed to ensuring that our billing and reimbursement practices comply with all federal

Disclose  
Conflicts  
of Interest.





## Ask yourself:

1. Does the clinical documentation support the necessity for, and level of, the services provided?
2. Am I ever instructed to process a bill in a way that is contrary to my understanding of third-party rules or regulations?
3. Am I ever asked to change a code or bill in order to increase reimbursement, even though I believe another code with a lower reimbursement is more appropriate?

and state laws, regulations, guidelines and policies, and that all bills are accurate and reflect current payment methodologies. We are committed to ensuring that all patients and customers receive timely bills and that all questions regarding billing are answered.

### Acceptance of Business Courtesies

We do not solicit anything from someone doing business with us or someone whose services are subject to our review. We do not solicit meals, drinks or entertainment. We do not solicit reimbursement for lodging or travel expenses or free lodging or travel. We do not solicit payments, benefits or gifts on behalf of ourselves or our family members provided by a vendor. Please refer to the Standard Practice titled *“Business Ethics and Conflicts of Interest.”*

### Providing Business Courtesies

Memorial's success in the marketplace results from providing quality services at competitive prices. We do not seek to gain an improper advantage by offering business courtesies such as entertainment, meals, transportation or lodging to customers, referral sources or purchasers of our services. State, local and foreign governmental bodies may also have restrictions on the provision of business courtesies, including meals and refreshments. Those of us doing business with such governmental bodies are committed to knowing and respecting all such restrictions.

### Educational Activities and Research Grants

We are committed to ensuring that all funds provided to support educational activities grants or healthcare research are provided for bona fide purposes. All research grants from vendors are for legitimate, bona fide research.

### Charitable Contributions

We are committed to ensuring that all charitable contributions directly benefit Memorial Healthcare System.

### Disclose!

The most important word to remember when it comes to conflicts of interest is disclose. We are obligated to be transparent in our dealings on behalf of Memorial. If we're ever in a situation where someone might wonder if our loyalty to Memorial is questionable (even if it's not), we have to disclose it.

For example, let's say that you are tasked with buying all the office supplies in your unit. Your best friend from college happens to sell office supplies. Even if your friend offers the best deal, the appearance of a conflict triggers the requirement to disclose the relationship to your supervisor.

# A Commitment to Our Board

## **Accurate Books and Accounts**

We are committed to ensuring that all payments and transactions are properly authorized, and be accurately and completely recorded on our books and records in accordance with generally accepted accounting principles and established corporate accounting policies. We record all payments and transactions and do not record false or incomplete entries. We do not maintain undisclosed or unrecorded corporate funds, nor do we place Memorial's funds in personal or noncorporate accounts.

## **Physical Assets**

We protect all corporate assets, regularly compare them to corporate records and reconcile any variances. We do not use supplies or equipment for personal purposes or remove them from the premises, even just to "borrow" them.

## **Avoiding Abuses of Trust**

We do not engage in any activity that might interfere or appear to interfere with the independent exercise of our judgment in situations where our personal interests might detract from or conflict with Memorial's best interest or the interests of Memorial's customers or suppliers.

## **Conflict of Interest**

We do not work, consult or have any other business relationship with a competitor, customer or supplier, or invest in any competitor, customer or supplier (except for moderate holdings of publicly traded securities). We do not invest in any privately held company that employs providers who may refer patients to Memorial or to which system patients may be referred.

We know that outside employment may constitute a conflict of interest if it places us in the position of appearing to represent Memorial Healthcare System, involves services substantially similar to those Memorial provides

or is considering making available, or lessens the efficiency, alertness or productivity normally expected of us in our jobs. We also recognize that outside employment may constitute a conflict of interest if we perform services either for (i) individuals or entities who may refer patients to Memorial (e.g., physicians), or (ii) individuals or entities to which Memorial patients may be referred (e.g., providers of ancillary services). All outside employment that raises any question in this regard must be disclosed to Memorial and approved in advance by the Compliance Officer.

## **Insider Trading**

We do not trade in the securities of any company, or buy or sell any property or assets, on the basis of nonpublic information acquired through employment at Memorial, whether such information comes from Memorial or from another company with which Memorial has a relationship.

## **Safeguarding Memorial Healthcare System's Restricted Information**

We do not disclose to any outside party any nonpublic business, financial, personnel, commercial or technological information, plans or data, and we protect these types of information from access by unauthorized personnel. Upon termination of employment at Memorial Healthcare System, we will not copy, take or retain any documents containing Memorial's restricted information. We will continue to protect the confidentiality of such information after the term of our employment ends, because we consider this an important part of our obligation to Memorial Healthcare System.

## **Intellectual Property**

We do not engage in any activity that infringes or misappropriates the intellectual property rights of others, including copyrights, trademarks, service marks, trade secrets, software piracy, and patents held by individuals, corporations or other entities.





## ? Ask yourself:

1. Do I ensure that my relationship with a competitor or supplier does not create the appearance of a conflict of interest?
2. Do I make sure that my family members are not involved in another business activity that might interfere with how I perform my duties as a Memorial employee?
3. Do I disclose any potential conflicts of interest to my supervisor?

Examples of prohibited activities include photocopying magazine articles or excerpts from trade journals or textbook pages; playing radio station broadcasts overhead or through public address systems; downloading MP3 content; using “Peer-to-Peer” file sharing software; and downloading non-Memorial-licensed software.

### **Financial Improprieties**

If you ever become aware of or suspect any potential improprieties regarding Memorial’s accounting, internal controls or auditing, report it immediately. Contact your supervisor, the Compliance and Audit Department, the Legal Department or the Compliance Hotline. Contact information can be found on the resources page at the back of this booklet.

# A Commitment to Our Community

## Marketing and Advertising Activities

We will provide honest information to the general public in conducting all marketing and advertising activities.

## Social Media Policy

We will provide honest information while using sound judgment and common sense. We will be transparent in every social media engagement. We will protect the privacy of our patients, co-workers and Memorial. We will be conscious when mixing our business and personal lives, and never disclose nonpublic information.

## Making Political Contributions

We do not contribute or donate Memorial's funds, products, services or other resources to any political cause, party or candidate. However, we may make voluntary personal contributions to any lawful political causes, parties or candidates, as long as we do not represent that those contributions come from Memorial and do not use Memorial's money to make these contributions.

## Giving Back to the Community

We serve our community by providing safe, quality, cost-effective, patient- and family-centered care, regardless of one's ability to pay. Our goals are to improve the health status of our community and becoming a world-class model of safety, quality, service and efficiency.

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## Community Accomplishments

- We were awarded the National Foster McGaw award in 2006 for outstanding commitment to the community by the American Hospital Association
- We have developed and maintained hundreds of community partnerships including government, nonprofit, faith- and community-based organizations, schools, neighborhood associations and businesses
- We facilitate the monthly meeting of the Coalition for a Healthy South Broward, dedicated to improving quality of life in our community
- We work continuously with low-income communities to assist them with access to healthcare through outreach, enrollment in Medicaid, Florida KidCare and Memorial Primary Care. Memorial Primary Care operates mobile health centers for both adults and children. Overall, primary care visits exceed 100,000 per year
- Approximately 20% of our employees have participated as community volunteers through the HERO (Healthcare Employees Reaching Out) corporate volunteer program
- We maintain a comprehensive network of speakers, available upon request, or deployed strategically
- We facilitate the Broward County Safe Kids Coalition as well as a wide range of safety and prevention programs targeting children
- Our Community Services Department designs and manages nearly 40 programs that address the important issues of maternal and child health, substance abuse, juvenile diversion, crime prevention, and kinship and foster care, plus after-school initiatives, summer camps and senior programming throughout Broward County



# Giving Back to the Community

# Resources to Help You Do The Right Thing

## Compliance and Audit Department

Compliance and Audit Department is led by a Compliance Officer and is supported by a team of professionals, including a Compliance Director, Internal Audit Director, Compliance and Internal Auditors, and Senior Information Systems and Privacy Auditor.



**Denise DiCesare**  
Compliance Officer

### Administers Memorial's Compliance Program, which includes:

- Developing current compliance policies, procedures and training
- Monitoring, auditing and reporting compliance issues
- Monitoring, auditing and reporting privacy issues
- Managing the Compliance Hotline and responding to employees' questions

The Compliance Officer can be contacted directly at **954-265-1875**

For more information, visit the **Corporate Compliance Department** page on Memorial's intranet.

## Office Hours

Our regular office hours are Monday through Friday, 8 am to 5 pm.

*We will be happy to meet with you at any time, by arrangement.*

## Physical Location

3111 Stirling Road, Ft. Lauderdale, FL 33312

Phone: 954-265-1875

Fax: 954-893-6199

## >> The Compliance Hotline

The Compliance Hotline is answered and staffed by an independent hotline company that specializes in healthcare compliance issues and is available 24 hours per day, 365 days per year. Callers may remain anonymous, and callers who give their names will be protected to the extent allowed by law. The Compliance Hotline may be reached in the following ways:

**Phone: 954-265-5855**

**Línea en Español: 1-800-297-8592**

**Online Reporting: <https://mhs.Alertline.com>**

## Other Resources

Document Center  
Standard Practice Manual  
HIPAA Central

Legal Department: 954-265-5933  
Corporate Human Resources Department: 954-265-5874  
Corporate Finance Department: 954-265-5120  
Clinical Effectiveness: 954-265-5871



# Statement of Understanding of and Compliance with Memorial Healthcare System's Code Of Conduct

## New Employees

I certify that I have read and understand the Code of Conduct and the Corporate Compliance Program, and agree to abide by it during the entire term of my employment.

I acknowledge that I have a duty to report any alleged or suspected violation of the Code of Conduct or the Corporate Compliance Program to the Compliance Officer.

I will promptly report any potential violation of which I become aware to the Compliance Officer or Compliance Team.

I understand that any violation of the Corporate Compliance Program, the Code of Conduct or any other corporate compliance policy or procedure is grounds for disciplinary action, up to and including discharge from employment.

I certify that I have not been convicted of, or charged with, a criminal offense related to healthcare, nor have I been listed by a federal agency as debarred, excluded or otherwise ineligible for participation in federally funded healthcare programs.

Unless otherwise noted below, I am not aware of any possible violation of the Code of Conduct or the Corporate Compliance Program.

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Date

Signature

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Place Employee Sticker Here



MEMORIAL REGIONAL HOSPITAL • MEMORIAL REGIONAL HOSPITAL SOUTH  
JOE DIMAGGIO  CHILDREN'S HOSPITAL • MEMORIAL HOSPITAL WEST  
MEMORIAL HOSPITAL MIRAMAR • MEMORIAL HOSPITAL PEMBROKE

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