

**SIGNATURE HEALTHCARE
BROCKTON HOSPITAL
ADMINISTRATIVE POLICY MANUAL**

Subject: Code of Ethical Behavior	Page 1 of 6
Effective Date: 9/97	Revised Date: 2/98, 7/00, 6/06, 7/09
References: MGL Chapter 111, S.70E DPH Advocacy Office Medicare Conditions of Participation	Classification Code: 100.006 Category: I

PURPOSE:

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

- an organizational code of ethics is in place
- ethical principles are clearly defined, communicated and reinforced
- mechanisms to monitor effectiveness of the organization’s code of 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 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. (Admitting Policy 400.405; Observation Status 200.117; TCU - Admission Policy 200.501; Patient’s Rights and Responsibilities 400.402; Patient Alias 400.407; Consent to Hospital Care 400.408; Safe Haven 100.911; Abuse 100.905; On-Site Utilization & Case Management Review Policy 400.510; Emergency Department Observation Status 100.509; Interpreter Services 100.908)
- 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.

Administration	Date	Legal Counsel	Date
Board of Trustees	Date	Medical Staff	Date

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(Discharge Planning 100.904; Perinatal Services Early Discharge of Mother and Newborn 200.210; On-Site Utilization & Case Management Review Policy 400.510; TCU - Transfer & Discharge Policy 200.516; Transfer of Patients from Signature Healthcare Brockton Hospital 200.099; Transportation of a Patient 200.100; Abuse 100.905; Indigent Patient Medications 100.903)

- 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. (Helicopter Transport 100.504; Discharge Planning 100.904; Patient's Transfer from the Emergency Room 200.101; Transfer of Patients from Signature Healthcare Brockton Hospital 200.000; Transportation of Patients 200.100)

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.
- 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. (Patient Complaint Process 200.109; Patient Rights and Responsibilities 400.402)
- c. Collection practices will meet federal and state regulations regarding debt collection. (Patient Complaint Process 200.109; Credit/Collection Policy 400.301; Uncompensated Free Care 400.410; Patient's Charges and Rates 400.101; Third Party Payor Contract 400.106; Patient's Rights and Responsibilities 400.402; Credit Card Policy 400.503)

3. Public Relations and Marketing Practices

- a. Signature Healthcare Brockton Hospital will adhere to all state and federal regulations which govern competitive behavior and business practices (American Hospital Association Guidelines)
- b. Signature Healthcare Brockton Hospital 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 on accreditation and licensure.

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- c. The privacy and confidentiality of patients' information will be maintained in any public relations and marketing efforts undertaken by Signature Healthcare Brockton Hospital. (Release of Information to the Media 100.805; Consent for Photography and Videography 100.806; Patient's Alias 400.407; Confidentiality of Computerized Patient Information 100.952; Confidentiality of Human Resources Records 100.307; Unauthorized Access to Computerized Patient Records 100.953; Patient Right to Privacy 200.110; Safe Haven 100.911; Abuse 100.905; Confidentiality and Release of Information from Medical Records 400.206; Corporate Compliance Manual)

4. Conflict of Interest

- a. All senior management, department managers, selected professional associates, physicians having contractual relationships with the hospital or receiving any remuneration from Signature Healthcare Corporation or its affiliates, and members of the Board of Trustees 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 the institution and shall obtain approval 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 addressed at the time of their occurrence. (Conflict of Interest 100.302; Donations to Other Organizations 100.210; Donations 100.808; Procedure for Handling Gifts of Stocks 400.501; Corporate Compliance Manual)

5. Proprietary Information and other Hospital Assets

- a. Managers, associates, members of the Medical Staff and volunteers are expected to protect hospital assets, including confidential and proprietary information. (Conflict of Interest 100.302; Articles Intended for Publication 100.803; Discharge Planning 100.904, Parental Notice & Authorization for Disposition of Fetal Remains 100.010; Safe Haven 100.911; Abuse 100.905; Interpreter Services 100.908; Restriction of Patient's Access to Communication/Visits 100.913; Patient Visitor Policy 200.107; Patient Alias 400.407; Adoption/Foster Care 100.901; Associate Patient Conflict Due to Cultural Values, Ethics, or Religious Beliefs 100.351; Confidentiality and Release of Information from Medical Records 400.206; Consent for Photography and Videography 100.806; Consent to Emergency Care Department 400.404; Discharge Medications 100.405; Emergency Treatment of Substance Abuse Patients 100.503; Service Animals & Pet Visitation Guidelines 100.104; Indigent Patient Medications 100.903 Informed Consent 400.401)
- b. All Hospital Assets are to be used solely for authorized, Hospital-related activities and are not to be subject to misuse or abuse. (Travel Authorization and Expense Reimbursement 400.109; Check Authorization 400.120; Purchasing Authorization Policy 100.701; Conflict of Interest 100.302; Reimbursement of Associates Membership Dues Paid to Professional Societies and Associations 100.304; Vendor Control Policy 100.703; Disbursement of Petty Cash 400.105)

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6. Patient Rights

- a. All patients, regardless of age, sex, sexual orientation, national origin, religion, disability or ability to pay are afforded the rights mandated by Massachusetts General Law and accepted professional practice. This applies to all managers, associates and members of the Medical staff and all settings of Signature Healthcare Brockton Hospital. (Patient Rights and Responsibilities 400.402; Confidentiality of Human Resources Records 100.307; Organ & Tissue Donation 100.105; H.I.V. Policy 100.110; Pastoral Care 100.322; Patient's Self Administration of Medications 100.406; Medical Screening Examination 100.506; Patient Complaint Process 200.109; Patient Right to Privacy 200.110; Security of Medical Records 400.201; Release of Special Privileged Information 400.209; Informed Consent 400.401; Confidentiality of Computerized Medical Record 100.952; Unauthorized Access to the Information System 100.953; Interpreter Services 100.908; Disclosure of PHI Requiring Patient's Authorization 400.213; Disclosure of PHI – Correctional Institutions and other Law Enforcement Custodial Situations 400.214; Disclosure of PHI – Deceased Individuals 400.215; Disclosure of PHI – Judicial & Administrative Release 400.216; Disclosure of PHI – Public Health 400.217; Disclosure of PHI to Family & Friends 400.218; Disclosure of PHI – Victims of Abuse, Neglect or Domestic Violence 400.222; Disclosure of PHI for Law Enforcement Purposes 400.226)
- b. Patients (or their representatives) have the right to refuse treatment or withhold or withdraw treatment within the limits of the law of the Commonwealth of Massachusetts. [Patient Elopement/Against Advice 200.103;; Refusal of Treatment 200.115; Withholding, Limiting and Withdrawal of Treatment 200.201; Health Care Proxy 100.909; Mechanism for Ethical Decision-Making 100.003]

7. Ethical Decision Making

- a. Ethical dilemmas, which arise in the care and treatment of patients, are resolved on a case-by-case basis; 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 the institution 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. (Mechanism for Ethical Decision-Making 100.003; Contracting 400.305; Corporate Compliance Manual; Health Care Proxy 100.909)

8. Conflict Resolution

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.

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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.

The Associate grievance procedure is designed to provide the associate with an acceptable means of expressing concerns and suggestions and thereby resolving matters in a fair and equitable manner.

- APM References – Patient Complaint Process 200.109; Mechanism for Ethical Decision-Making 100.003; Patients Rights and Responsibilities 400.402; Associate Patient Conflict Due to Cultural Values, Ethics or Religious Beliefs 100.351.
- Human Resources Policy Manual

9. Signature Healthcare Brockton Hospital maintains an ethical environment in all aspects of its operations and practices. Policies regarding specific codes of conduct include:

- *Medical Staff Conduct:* Disruptive Conduct by Members of the Medical Staff 100.009; Code of Ethical Behavior 100.006.
- *Corporate Compliance:* Corporate Compliance Program Manual

Human Resources:

- APM References – Sexual Harassment 100.220; Occupational Accommodation Request 100.231; Family and Medical Leave of Absence Policy 100.300; Americans with Disabilities Act Compliance 100.309; Chemical Dependency 100.319; Employment Policy 100.305; Competency Assessment 100.342; Drug Free Workplace 100.350.
- Corporate Compliance Manual – “Drug Free Workplace” p. 44
- Signature Healthcare Brockton Hospital Human Resource Manual.

Discrimination:

- APM References – Emergency Treatment of Substance Abuse Patients 100.503; Admitting Policy 400.405; Discharge Planning 100.904; Americans with Disabilities Act Compliance 100.309; Sexual Harassment 100.220; Temporary Transitional Duty 100.230; Occupational Accommodation Request 100.231; Family and Medical Leave of Absence Policy 100.300.
- Corporate Compliance Manual – “Discrimination” p. 47

Quality Resources:

- Patient Care Assessment Program

Purchasing:

- APM References – Purchasing Authorization Policy 100.701; Guidelines for Centralized Purchasing 100.702; Vendor Control Policy 100.703; Conflict of Interest 100.302; Code of Ethical Behavior 100.006; Contracting 400.305.
- Corporate Compliance Manual – “Purchasing” p. 50; “Independent Contractor and Vendors: p. 53.

Fundraising:

- APM References – Special Event Fundraisers 100.802; Solicitation of Associates 100.323; Donations to Other Organizations 100.210.
- Corporate Compliance Manual – “Fund Raising” p. 51

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Physician Recruitment:

- Corporate Compliance Manual – “Physician Recruitment” p. 15, “Group Practice Acquisition” p. 16.

Tax Exempt Status:

- Corporate Compliance Manual – “Tax Exempt Organizations” p. 27

Securities Laws:

- Corporate Compliance Manual – “Securities Laws” p. 36

Record Keeping and Retention:

- APM References – Confidentiality of Computerized Patient Information 100.952; Unauthorized Access to the Computerized Patient Record 100.953; Access to Clinical Data and Transcription Reports 100.954; Patient Access to Healthcare Records 400.205; Confidentiality and Release of Information from the Medical Record 400.206; Release of Special Privileged Information from Medical Records 400.209.

Faxing:

- APM References – Confidentiality and Release of Information from Medical Records 400.206; Faxing Policy 400.210.