



INTRO LETTER

The lives of our patients depend upon our doing what we say we will do with speed, accuracy, quality and integrity. This is why we take compliance and ethics so seriously. The University of Maryland Medical System has set high standards for business integrity to fulfill our obligations to our patients and their loved ones, to the communities we serve, and to each other.

The Standards of Business Conduct describe a set of shared principles upon which we can continue to build a reputation for excellence. These Standards apply to all aspects of our clinical and business operations and should serve as a guide when providing services on behalf of our organization.

In today's highly regulated health care environment, each of us must take the responsibility to foster a culture that encourages a strong understanding and commitment to regulatory compliance. To rise to this challenge, we must remain true to our principles even under internal or external pressure to do otherwise. We must honor and protect the confidence that has been earned over the course of more than a century by generations of persons who dedicated their careers to the Medical System. To preserve our reputation and sustain our Medical System, we must hold ourselves accountable to the high standards of our vision.

Whether you work in clinical operations, billing, finance, marketing or any other aspect of our business, you must make a positive contribution to our shared success. At the core of this effort is an obligation for all of us to accept and follow the principles outlined in the Standards of Business Conduct. You will find good information in these Standards to guide your decisions, but no single document can ever address every situation. Therefore, we encourage you to ask questions. You have in this document the names and contact numbers of many other resources who can help provide you with assistance to your specific questions or concerns.

We appreciate the work that you do every day to build on the excellence of the generations before you. Please join us in embracing these Standards of Business Conduct as the foundation of a corporate culture based on integrity.

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Standards of Business Conduct

PURPOSE OF THE STANDARDS OF BUSINESS CONDUCT

We are committed to doing business in compliance with applicable federal, state and local laws and regulations. The Standards of Business Conduct are designed to help us accomplish these objectives by establishing a framework for acting with integrity and accountability in accordance with a shared set of principles. The Standards cannot, however, address every issue that we may encounter. There are many other policies and systems to help us with specific issues. You should read these policies and ask questions. As the laws around us change, these policies and procedures will also evolve.

The Standards of Business Conduct are not an employment contract. The Medical System reserves the right to modify, revise or alter any policy, procedure or condition of employment at its sole discretion. Unless otherwise specified by contract or state law, employment with the Medical System is at will and may be terminated by either the employee or the Medical System at any time, for any reason or for no reason.

WHO IS COVERED

The University of Maryland Medical System includes the following Affiliates:

University of Maryland Medical System Corporation has these institutional Affiliates:

- University of Maryland Medical Center – University Campus
- University of Maryland Medical Center – Midtown Campus
- University of Maryland Rehabilitation and Orthopaedic Institute
- University of Maryland Baltimore Washington Medical Center
- University of Maryland Shore Regional Health
- University of Maryland St. Joseph Medical Center
- University of Maryland Charles Regional Medical Center
- University of Maryland Upper Chesapeake Health
- University of Maryland Capital Region Health
- University of Maryland Physician Network
- Mt. Washington Pediatric Hospital

There are additional Affiliates that are also part of the University of Maryland Medical System family. If you have any question as to whether these standards apply to you, please discuss with your supervisor or call 410-328-3889.

The standards apply to all employees of the University of Maryland Medical System and its Affiliates (collectively "Medical System"), as well as medical staff members, vendors and other professionals who provide services to or on behalf of the Medical System.

COMPLIANCE – A SHARED COMMITMENT

We have a shared commitment to compliance within the Medical System. The Boards of Directors and the executive leadership teams are ultimately responsible for establishing and enforcing standards of business conduct, policies, procedures and systems that assist us in understanding and meeting these standards. All of us are responsible for acting with integrity at all times and for upholding these standards and policies.

PERSONAL RESPONSIBILITIES

To our patients and their loved ones, your actions represent the University of Maryland Medical System. Our success depends upon each of us accepting personal responsibility for doing the right thing. We accept the personal responsibility to ask questions and to stop or prevent actions that could cause harm. You should know the basic laws and regulations that apply to your job. If you have questions, ask a supervisor or use other resources. You should also know and follow policies and procedures that pertain to your role.

Each employee is expected to:

- **Comply with all laws and ethical standards.**

You will never be expected to violate the law or any ethical standard of your profession. If you ever feel pressure to do something with which you are uncomfortable or have any questions, seek guidance from the resource personnel listed in Appendix A.

- **Apply the Standards of Business Conduct.**

You are expected to read and understand these standards. Use good judgment and apply the standards every day in the course of your job. Questions about the standards or how

they apply to you can be directed to your supervisor or resources described in “Getting Answers”.

- **Know the requirements.**

These standards do not require you to be a legal expert. You are expected, however, to be familiar with the requirements that apply to your specific job and responsibilities. Pay close attention to all training information and policies. It is your responsibility to ask questions if you would like more clarification or information.

- **Be part of a team.**

You are expected to show respect and courtesy to the persons you interact with. If you suspect that standards are not being met or rules are being violated, you are expected to let somebody know (for example your supervisor, director, or the compliance hotline). If there are opportunities for improvement in policies and systems, offer suggestions so that others may benefit. You are expected to cooperate with process improvements, patient safety initiatives, audits, and internal investigations.

- **Report potential violations of law or policy.**

If you believe there is a potential violation of law or policy, you are required to bring the matter to the attention of your supervisor or other resource under the “Getting Answers” section. Do not assume that others are aware of the issue.

- **Report safety concerns.**

If you believe that there is an unusual or unnecessary potential for harm, you are required to correct the action or to bring the matter to the attention of your supervisor or other resource under the “Getting Answers” section. Do not assume that others are aware of the issue.

- **Report significant changes.**

You must inform your supervisor and human resources department if you are convicted of a felony. You must inform your supervisor and human resources department if you have sanctions threatened or imposed against your professional license or are informed

by any governmental entity that you are no longer eligible to participate in federal or state reimbursement programs or contracts.

- **Protect confidential information.**

If you have access to confidential information (including patient information, financial information, marketing, and/or business information), you have a responsibility to not disclose this information.

- **Fairness, Respect and Dignity.**

Treat all persons with fairness, respect, and dignity.

SPECIAL RESPONSIBILITIES OF SUPERVISORS AND MANAGERS

Supervisors and managers are in positions of trust and authority and have special responsibilities to sustain an ethical work environment and to lead by example. As a supervisor or manager, you should ensure that all employees and contractors understand and apply the principles outlined in the Standards of Business Conduct and other policies. Communicate relevant policies to your employees and assist them in understanding the policies. Never ask or expect an employee to violate the rules at any time. Further, maintain open and honest two-way communications with your employees. Encourage questions, suggestions, and reports of wrongdoing. Be clear in your verbal and written communications to avoid any inference of tolerating rule violations.

- **Be proactive.** Ensure that employees and contractors are properly trained and understand their obligations under the standards. Ensure that policies and procedures are in place to promote compliance with regulatory standards.
- **Be receptive.** Maintain an open-door policy for concerned employees. Make it clear that you are open to questions or concerns about compliance-related issues.
- **Be responsive.** Follow up on allegations of wrongdoing with quick and appropriate action. Contact one of the resources in Appendix A.
- **Do not allow retaliation.** Ensure that no one who reports a suspected violation of law or policy is subject to any retaliation.

Leadership requires that you set a personal example of integrity in all aspects of your job.

Consider your employees' compliance efforts and results when you are doing your evaluations.

Make employees available for and emphasize the value of training. It is up to you to set the right tone for the people who report to you. It is also important to recognize that the persons who report to you may be placed in a difficult position if you ask them to do things that are not related to their employment. For those reasons, supervisors should not ask employees to help with personal matters and should not request their employees donate to particular political candidates.

CONSEQUENCES OF NON-COMPLIANCE

Failure to comply with the law and federal and state health care regulations could lead to serious consequences for you, your fellow employees, medical staff members, contractors, and the organization. These may include prison, termination of employment, personal or corporate fines, exclusion from Medicare and other health care programs, loss of credibility and respect by physicians and patients.

GETTING ANSWERS OR REPORTING YOUR CONCERNS

Open discussions of regulatory and policy issues without fear of retaliation are vital to the effectiveness of the Compliance Program. Ask questions about policies or practices that you do not understand and report suspected violations of law or policy to a supervisor or other appropriate person. Any of the following resources (*see also* Appendix A) may be used for this purpose.

YOUR SUPERVISOR

Many questions and problems can best be addressed at the department level. Your supervisor knows you and the issues in your workplace better than anyone else in the Medical System.

THE HUMAN RESOURCES DEPARTMENT

If your question or concern involves a human resources or general workplace issue, contact your human resources department.

AFFILIATE COMPLIANCE OFFICER

Each of the Medical System Affiliates has an Affiliate Compliance Officer. Their contact information is included in Appendix A.

CORPORATE COMPLIANCE AND BUSINESS ETHICS GROUP

Questions or concerns relating to health care or other regulatory issues may be brought to the attention of the Corporate Compliance and Business Ethics Group by phone 410-328-3889 or by email (compliance@umm.edu).

COMPLIANCE HOTLINE

If you have not been able to resolve an issue through other channels or if you feel uncomfortable discussing the concern with your supervisor or other managers, you may call the toll-free Compliance Hotline at 877-300-3889 or go online to www.reportit.net to report a concern. You can report the concern confidentially and, if you choose, anonymously. We will also not tolerate retaliation against reports of concerns. The Compliance Hotline operates 24 hours a day, 7 days a week. Your call will not be traced or recorded and your anonymity will be protected up to the limits of the law if you wish to remain anonymous.

All reports received by the hotline will be investigated. If substantiated, corrective actions will be taken, including disciplinary action against employee(s) and/or other involved parties, changes to policies and systems, additional training, and/or disclosure of issues to appropriate governmental or other entities.

The hotline is intended to supplement, not replace, other channels for communicating questions and concerns within the Medical System. When you call the hotline, you will be given a report number which will allow you to follow-up on your report. This will also allow Corporate Compliance to seek your help in answering questions while protecting your anonymity. Calling back or responding to the questions is entirely voluntary, but may assist in conducting a more thorough investigation.

THE STANDARDS

LEGAL OBLIGATIONS

STANDARD: As representatives of the Medical System, we will comply with federal, state and local laws and regulations that apply to our business.

You should know the basic laws and regulations that apply to your job. If you have questions, ask a supervisor or other resources. You should also know and follow policies and procedures. If you have concerns about the legality of any matter, you are responsible for consulting with one of the resources identified in the “Getting Answers” section in these Standards before any potentially illegal acts have taken place.

Suspected violations of law or regulation must be promptly reported to a supervisor or other appropriate person (Appendix A).

Competitive pressure or “industry practice” is never a valid reason for violating company policy or regulatory standards.

QUALITY OF CARE AND TREATMENT OF PATIENTS

STANDARD: As representatives of the Medical System, we will furnish high-quality medical care to patients safely and in accordance with professional standards. We will respect each patient’s dignity and right to privacy of medical information.

Quality Services - Furnishing high-quality medical care to patients is the primary goal of the Medical System. Services should be furnished in accordance with medical orders issued by a physician or another authorized health care professional based on the needs of each patient.

Some examples of how services must be furnished:

- Medical services should be furnished skillfully, safely and in accordance with clinical policies and procedures, government regulations, and professional standards.
- Services should be medically appropriate for the patient.
- Only persons with appropriate training and professional credentials and licenses may furnish or supervise the delivery of medical care.
- No health care professional should ever furnish a service, or take any action, that would violate a professional code of ethics or practice act.

Treatment of Patients - All patients will be treated with respect and dignity. Patients will not be denied access to medical services at any Medical System hospital based on race, ethnicity, sex, sexual orientation, gender identity, religion, national origin, color, creed, age, mental disability, physical disability or other protected classification. The well-being of patients should be the focus of all employees, whether their roles involve direct patient care or other supportive functions. Some examples of ways you should demonstrate this focus include:

- Respond promptly and courteously to patients' questions and concerns.
- Provide adequate and accurate information to patients and their families in order to allow them to participate in treatment planning whenever appropriate and to make informed treatment decisions.
- Medical ethical issues may arise related to treatment provided to our patients. When confronted with such ethical concerns, you should voice your concerns through the proper mechanism. Each Medical System hospital has a mechanism for addressing medical ethical concerns.

Safe Patient Care - Safe care is essential to the well-being and recovery of patients. The Medical System will promote a corporate-wide safety culture.

- Buildings and space will be maintained in order to protect patients, visitors, and staff.
- Equipment used to furnish medical services should be safe, effective and in good working order at all times. Maintenance will be performed and documented in accordance with the manufacturer's instructions and contract requirements.

Clinical records - All clinical records should be accurate and complete.

Protection of patient health information - All patients' medical and financial information must be treated as confidential. Only those who require specific patient information to furnish care, perform quality control activities, bill or collect charges for services, or furnish other administrative services (known as treatment, payment, and operations) are permitted access to that patient's health information unless authorized by the patient. Any improper use or disclosure of patient health information, whether oral, written, or electronic should be reported to a manager.

Dispensing Drugs and Controlled Substances - The loss, diversion, or misuse of any controlled substance must be reported immediately to a supervisor.

Clinical Research - All research activities conducted at Medical System hospitals must be reviewed and approved in advance to ensure that research protocols have been reviewed, patients have been informed and have given consent to participate, and that systems are in place to prevent inappropriate billing or disclosure of confidential information.

SALES AND MARKETING

STANDARD: As representatives of the Medical System, we will market our services fairly and accurately. We must not offer or accept any kickback or other unlawful benefit. We will respect copyright and trademark rules when using materials published by others.

BILLING AND CODING

STANDARD: All claims for services must be fair, accurate, and conform to applicable regulatory and contractual requirements. Collecting the correct payment for the services provided is a fundamental part of the Medical System's business. Accordingly, care should be taken to properly code, bill, and collect only for services actually rendered and that are documented properly.

Principles-

- Bills must be coded to accurately reflect the services rendered, as well as relevant diagnoses.
- Billing, coding and collection practices must conform to applicable regulatory requirements and commercial contract obligations.
- Coders must be trained and qualified to perform such functions.
- Overpayments must be promptly identified and returned to payors.
- Effective management controls will minimize the scope and frequency of billing errors.

If you discover an error or a suspected error in a claim or in any billing system, promptly alert your supervisor or another person (*see* Appendix A).

WORKING ENVIRONMENT

STANDARD: As representatives of the Medical System, we take personal responsibility to maintain a work environment where all of those we interact with are treated fairly and with dignity and respect, can perform their jobs safely and effectively, and are encouraged to realize their full potential.

Additional information on the duties of each employee to promote these policies and programs is provided in each Affiliate's employee handbook.

Fair dealing – We must deal fairly with the Medical System's customers, suppliers, and employees. We must also deal fairly and honestly with the Medical System in recording hours worked, using Medical System property, seeking reimbursement for business-related expenses and all similar matters.

Diversity, discrimination and harassment - We value a diverse workforce and recognize its contribution to creativity and business growth. We will not tolerate unlawful discrimination or harassment. Harassment includes slurs, offensive remarks, jokes, and other visual, verbal, or physical conduct that could create a hostile or offensive work environment. All employees and applicants for employment must be afforded equal employment opportunities without regard to race, ethnicity, sex, sexual orientation, gender identity, religion, national origin, color, creed, age, mental disability, physical disability or any other protected classification.

Disruptive behavior - Behavior that promotes excellent clinical care and superior patient satisfaction is expected. Verbal or physical behavior that could reasonably be expected to disrupt patient care is not tolerated.

Workplace violence – We will never engage in acts of physical violence or threats of violence. This includes abusive or aggressive behavior intended to threaten or intimidate another person.

Impairment related to the use of alcohol or drugs – We are committed to work free from the influence of alcohol or illegal drugs in the workplace. Further, impairment related to alcohol or any drug use (whether legal or illegal) while conducting Medical System business jeopardizes the health and safety of patients and other employees and contractors. Employees and contractors who suspect that a co-worker is intoxicated or under the influence of illegal drugs should notify a supervisor.

Professional practice acts – We will conform to applicable professional practice acts and professional codes of ethics at all times.

Health and safety – We will be familiar with the potential hazards in their workplace and comply with government regulations and policies relating to workplace safety. These policies and requirements include safety management plans, standard precautions for potentially infectious materials, storage and use of hazardous materials.

Handling and disposal of infectious materials - We will properly dispose of blood and other bodily fluids, used needles and syringes, potentially toxic chemicals, and other materials.

REPORTS AND RECORDS

STANDARD: As representatives of the Medical System, we will keep accurate and timely reports and records, which are the foundation of any business. Examples of these reports and records include: accounting entries, financial reports, employee expense reports, medical records, billing and invoices, employment records, unusual occurrence reports, and committee and board minutes.

Record keeping and management

You are expected to be familiar with and comply with record retention policies that apply to documents (both paper and electronic) in your custody or control. Special care should be taken to preserve documents that are known to be subject to a government investigation, commercial litigation or audit.

Financial reports

All financial reports, accounting records, and other documents must accurately and clearly represent the transaction. Financial reports must be prepared in accordance with generally accepted accounting principles and legal requirements.

MANAGEMENT OF MEDICAL SYSTEM RESOURCES

STANDARD: As representatives of the Medical System, we will manage our resources honestly and wisely. Medical System resources must be dedicated for business purposes. Resources of the Medical System include, among others: staff time, supplies, computers, and money.

Confidential or proprietary information

In addition to physical and financial assets, the Medical System assets also include certain intangible or “intellectual” property. This includes processes, inventions, pricing information, provider agreements, financial information, development plans and other information that has not been made public. No confidential or proprietary information should be disclosed to individuals within or outside the Medical System who do not need the information to perform their duties, unless expressly authorized by a supervisor or manager.

Uses of information systems

The Medical System’s information systems, including all hardware and software used to support such systems, should be used for business purposes. No software should be installed on Medical System computers or used for Medical System purposes without approval by Information Services and Technology.

CONFLICTS OF INTEREST (DISCLOSURES OF FINANCIAL RELATIONSHIPS)

STANDARD: As representatives of the Medical System, we will manage situations in which our personal or financial interests may cause our loyalties to be divided or others to doubt our fairness or integrity.

A potential conflict of interest occurs if a business or personal relationship with another person or entity makes it more difficult for the person to be objective in performing their duties for the Medical System. Examples of situations that may create the appearance of a conflict of interest include:

- A person who is in charge of buying copy paper for their workplace starts buying all of the copy paper from her sister’s newly formed copy paper company.
- An employee uses a consultant company where his best friend also works.
- A vice president takes a trip paid for by a new software company to an exotic location that is not necessary to evaluate the software functionality. The vice president then signs a contract with that company.
- A physician is part owner of a company that performs a specialized laboratory test. The physician starts sending all of his tests to the company he owns.

In general, employees are permitted to hold other jobs so long as doing so does not put the employee in a position to compromise confidential or proprietary information or prevent the employee from meeting the performance standards of their position at the Medical System. Do not take personal advantage of business or investment opportunities that are discovered through your association with the Medical System.

If you have a question about whether a specific situation may be a conflict of interest, review the Conflicts of Interest policy and submit the associated form to your Affiliate Compliance Contact (*see Appendix A*).

DEALING WITH THE MEDIA

STANDARD: In general, only the Medical System's executive officers and specifically designated members of the corporate communications should speak to the media on behalf of the Medical System. Local media contacts by hospital personnel about hospital business should be coordinated with the Communications department.

GOVERNMENT FILINGS AND REPORTS

STANDARD: The University of Maryland Medical System will make all required filings and reports to federal, state, and local government authorities accurately and in a timely manner. This includes, but is not limited to, Medicare cost reports and other required program filings, tax filings, and certificate of need filings and reports.

The Medical System will cooperate with authorized requests for information from government auditors and other officials.

Employees and contractors responsible for providing information to be included in a report or filing to be signed by a more senior manager are responsible for ensuring the accuracy of the information, providing the information in a timely manner, and disclosing any problems or concerns to the manager before the final report or filing is submitted. Those signing the reports or filings are responsible for asking reasonable questions.

Documentation and work papers used to prepare or support information contained in a government report or filing should be retained in accordance with record retention policies.

LOBBYING AND POLITICAL ACTIVITIES

STANDARD: We each have the right to individually support political candidates and issues of our choosing. However, this involvement, unless prior approval is granted by the Senior Vice President of External Affairs or is part of your job description, must be done on your own time and at your own expense. Do not use company assets or resources for political purposes unless prior approval is granted. You must make it clear that the views you express are your own and not those of the Medical System. All lobbying and other government advocacy carried out by or on behalf of the Medical System must conform to applicable federal and state regulations.

Political activities - Medical System funds and assets, including the use of buildings, may not be used to support a political candidate or party.

Gifts to public officials - Strict laws and rules govern the giving of gifts, including meals, to public officials and their staff members. Employees or agents should never give or promise anything of value to any government official in exchange for a specific action or decision.

AUDITORS AND REGULATORS

STANDARD: We will cooperate with auditors and regulators as they conduct audits and inspections. These external reviews assist the Medical System in maintaining our reputation and services.

Verify (i.e. ask for and examine the badge/photo identification that associates this individual with the claimed agency) the name of the agent, the agency, the subject of the inquiry and any other relevant information.

We must not destroy or alter documents or records in anticipation of a government subpoena or other government request for documents or make any intentionally false or misleading statement to a government official or advise another employee to do so.

APPENDIX A: IMPORTANT CONTACT INFORMATION AND RESOURCES**Corporate Compliance & Privacy Contacts**

<i>Contact Person</i>	<i>Title</i>	<i>E-mail</i>	<i>Phone</i>
Jeff Stavely	VP, Interim Chief Compliance Officer	jstavely@umm.edu	410-328-2791
Martina Sedlak	Privacy Officer	msedlak@umm.edu	410-328-3889

Affiliate Compliance & Privacy Contacts

<i>Affiliate</i>	<i>Contact</i>	<i>E-mail</i>	<i>Phone</i>
UMMC – University Campus	Martina Sedlak	msedlak@umm.edu	410-328-3889
UMMC – Midtown Campus	Sheryl Blecker	sblecker@umm.edu	410-225-8311
UM St. Joseph Medical Center	Heather Hill	Heather.Hill@umm.edu	410-337-1477
UM Rehabilitation and Orthopaedic Institute	Laura Muchow Martha Green	lmuchow@umm.edu mgreen1@umm.edu	410-448-6769 410-448-6888
UM Baltimore Washington Medical Center	Charles Prandy	Charles.Prandy@umm.edu	410-787-4650
UM Shore Regional Health	Linda Pittman	lpittman@umm.edu	1-410-822-1000, ext. 5446
UM Charles Regional Medical Center	Denise Ferguson	dferguson1@umm.edu	301-609-4322
Mt. Washington Pediatric Hospital	Marlene Moon Linda Carson	MMoon@mwph.org Linda.Carson@mwph.org	410-578-5349 410-578-2635
UM Physician Network	Jon Martin	Jonathanmartin@umm.edu	443-462-5592
Upper Chesapeake Health	Debbie Bittle Tina Hornung	dbittle@uchs.org THornung@uchs.org	443-643-3100 443-643-2466
UM Capital Region Health	Meredith Harrison	Meredith.Harrison@dimensionshealth.org	301-583-4020

Corporate Shared Service Contacts

<i>Department</i>	<i>Contact Persons</i>	<i>E-mail</i>	<i>Phone</i>
Office of General Counsel (aka legal)	Mia Zorzi	mzorzi@umm.edu	410-328-9700
Risk Management	Sue Kinter	skinter@mmcip.umm.edu	410-328-1770
Government Affairs	Donna Jacobs	djacobs@umm.edu	410-328-7410

Standards of Business Conduct Receipt Form

I have read and understand the Standards of Business Conduct for the Medical System. I understand that adherence to these Standards is an essential element of my employment. I agree to discuss any questions or concerns related to the Standards with my supervisor or a member of management. I acknowledge and agree that I am responsible for familiarizing myself with and complying with the Medical System policies and procedures.

I understand that applicable laws may change from time to time and new laws may be enacted. I acknowledge and agree that I am responsible for familiarizing myself with and complying with any new or revised policies or procedures. I further acknowledge and agree that the Medical System reserves the right in their respective sole discretion to amend policies, procedures, programs and/or guidelines at any time.

I acknowledge and agree that the Standards are not an employment contract.

I certify and attest that I currently am not and have not been sanctioned by or excluded from participation in federal health care programs. I will notify Human Resources immediately if I am or may be sanctioned by or excluded from participation in federal health care programs, including but not limited to any action or activity which could become the basis for an adverse action by a federal health care program.

I certify and attest that I am not aware of any ongoing activity within the Medical System that may violate the Standards or applicable law. I agree to notify my supervisor or a member of management immediately if I am or become aware of any activity that may violate the Standards or applicable law.

Date

Employee Signature

Print name

Approved by the ECC