

STANDARDS

of

BUSINESS CONDUCT



INTRO LETTER

As Maryland's premier health care system, the University of Maryland Medical System, in partnership with the University of Maryland School of Medicine, has an obligation to set high standards for business integrity. Our vision of serving Maryland includes:

- The highest quality patient care
- Service excellence
- Commitment to academic medicine by supporting:
 - Medical advancements and
 - The education of future health care professionals to work in the communities we serve
- All provided in a cost effective manner

The core values of the University of Maryland Medical System – Service, Respect, Excellence, Integrity, and Teamwork – guide our behaviors.

Our success depends on maintaining our reputation for providing high quality services and maintaining business integrity. 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 for all employees, medical staff and contractors when providing services on behalf of our organization.

In today's highly regulated health care environment, it is important 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. There can be no shortcuts or special exceptions. We must never lose the confidence of our patients or their physicians by failing to provide high quality medical care – or of our business partners, our payors, or government officials by failing to conduct our business with integrity.

Whether in clinical operations, billing, finance, marketing or any other aspect of our business, each of us can make a positive contribution to our shared success. At the core of this effort is an obligation for all of us to accept and adhere to the principles outlined in the Standards of Business Conduct. Because no single set of business standards can address every situation, a number of other resources are available within the Medical System to provide assistance with specific questions or concerns. These include policies covering a variety of operational and regulatory topics as well as the Corporate Compliance Department – see Appendix A.

Please join us in embracing these Standards of Business Conduct as the foundation of a corporate culture based on integrity.

Handwritten signature of Robert A. Chrencik in black ink.

Robert A. Chrencik
President and CEO
University of Maryland Medical System

Handwritten signature of Lyle E. Sheldon in black ink.

Lyle E. Sheldon
President and CEO
UM Upper Chesapeake Health

Handwritten signature of Christine Bachrach in black ink.

Christine Bachrach
Chief Compliance Officer
University of Maryland Medical System

Standards of Business Conduct

PURPOSE OF THE STANDARDS OF BUSINESS CONDUCT

The University of Maryland Medical System is committed to conducting business in compliance with all applicable federal, state and local laws and regulations and to acting, at all times, in conformance with the highest standards of business integrity. The Standards of Business Conduct are designed to help us accomplish these objectives by establishing a general framework for acting with integrity and accountability in accordance with a shared set of principles. They cannot, however, address every issue that may arise in the course of our business. There are many more focused policies and systems to address specific areas in greater detail. These policies should be consulted as a supplement to the standards.

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

WHO IS COVERED

University of Maryland Medical System Corporation includes the following Affiliates:

- Baltimore Washington Medical Center
- Chester River Hospital Center
- Civista Medical Center
- James Lawrence Kernan Hospital
- Maryland General Hospital
- Shore Health System
- Mt. Washington Pediatric Hospital
- University of Maryland St Joseph Medical Center
- University of Maryland Medical Center
- Upper Chesapeake Medical Center
- Harford Memorial Hospital
- Other affiliates identified on Appendix B

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

OUR COMPLIANCE PROGRAM

The Medical System's Compliance Program is based on eight key elements

- **Development of effective regulatory compliance policies and management controls.** The policies are made available through each Affiliate in an electronic format.
- **Promotion of strong compliance governance function and "tone at the top" through a formal structure** that promotes adherence to the Compliance Program. The Chief Compliance Officer ("CCO") reports to the Audit and Compliance Committee of the Board of Directors, which is responsible for oversight of the compliance program; the Executive Compliance Committee is responsible for approving the annual compliance plan and policies, and the Hospital Compliance Committees are responsible for the implementation of the Compliance Program.
- **Dissemination of policies to employees and contractors and development of appropriate training mechanisms** to ensure that such policies are clearly understood.

- **Provision of opportunities for employees and contractors to ask questions or report suspected violations** of policies or regulatory obligations without fear of retaliation and the prompt investigation of all credible reports of such violations.
- **Regular self-monitoring and independent review** of the effectiveness of internal controls related to regulatory requirements and other potential risks.
- **Accountability for violation** of policies or regulatory obligations (including those in supervisory positions who allow, or unreasonably fail to prevent, improper conduct).
- **Continuous improvement** of the Compliance Program based on experience.
- **Assessment of compliance risks** to assist in guiding the best use of compliance resources.

COMPLIANCE – A SHARED COMMITMENT

Compliance is a shared commitment among all Medical System employees, medical staff members, and contractors. The Medical System, through the board of directors and senior management, is responsible for setting standards of business conduct and for developing policies, procedures and systems to assist employees and contractors in understanding and meeting these standards. Employees and contractors are responsible for acting with integrity at all times and for upholding the standards and policies established by the Medical System.

Guidelines for employees

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.

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 resource personnel listed in Appendix A.
- **Know the law.** These standards do not require you to be a legal expert. You are expected, however, to be familiar with the basic laws that apply to your specific job and level of responsibility. Pay close attention to all training information and policies. Do not be afraid to ask questions.
- **Be part of a team.** Offer suggestions to improve management controls or make policies and systems easier to understand and use. Cooperate with The University of Maryland Medical System representatives on audits and internal investigations.
- **Report potential violations of law or policy.** If you believe there is a potential violation of law or policy bring the matter to the attention of your supervisor or other avenue under the Getting Answers section. Do not assume that senior management already knows about an issue.
- **Report exclusions and convictions.** You must inform your supervisor and human resources department if you are convicted of a felony, 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.

Special responsibilities of supervisors and managers.

Supervisors and managers have a special responsibility for compliance and integrity. 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. Never ask or expect an employee to violate the rules at any time. Further, 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.** Take prompt and appropriate action when a suspected violation of law or policy is brought to your attention. 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 in good faith is subject to any retaliation.

Leadership requires that you set a personal example of integrity in all aspects of your job. It is up to you to set the right tone for the people who report to you.

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, and contractors, and the organization. These may include termination of employment, prison, personal or corporate fines, exclusion from Medicare and other health care programs, loss of credibility and respect by physicians and patients.

GETTING ANSWERS TO QUESTIONS OR REPORTING A POSSIBLE VIOLATION OF LAW OR POLICY

Open discussion of regulatory and policy issues without fear of reprisal is 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 or department manager

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. If they do not have an answer, they have access to other resources.

The human resources department

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

Hospital / Affiliate Compliance Officer

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

Corporate Compliance

Questions or concerns relating to health care or other regulatory issues should be brought to the attention of the Corporate Compliance Department 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 about raising an issue through 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 confidentially and anonymously and without fear of retaliation. The Compliance Hotline operates 24 hours a day, 7 days a week. It is staffed by an independent company with no other relationship to the Medical System. 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, appropriate 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 fully protecting your anonymity. Calling back or responding to the questions is entirely voluntary, but may assist in conducting a more effective investigation.

THE STANDARDS

Legal obligations

STANDARD: The Medical System 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. The Medical System will not employ or contract with any person or entity that is ineligible to participate in federal health care programs.

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: The Medical System 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, 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 - The Health Insurance Portability and Accountability Act (HIPAA) and Maryland laws set the standard for maintaining the confidentiality of patients' protected health information (PHI) whether oral, written, or electronic. 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 TPO – Treatment, Payment, and Operations) are permitted access to that PHI unless authorized by the patient. Any improper use or disclosure of PHI should be reported to a manager. The Health Information Technology for Economic and Clinical Health Act (HITECH) of 2009 requires certain improper uses and disclosures to be reported to the patient and the government.

Dispensing Drugs and Controlled Substances - Federal and state governments regulate the use of controlled drugs and other pharmaceuticals, including orders, storage, administration and inventory. 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: The University of Maryland Medical System will market its services fairly and in accordance with federal and state laws and regulations. The Medical System will not offer or accept any kickback or other unlawful benefit for the purpose of inducing the referral of patients or health care products or services.

Accuracy and Integrity - All sales and marketing presentations and literature will fairly and accurately describe Medical System services. The Medical System will respect copyright and trademark rules when using materials published by others.

Fraud and abuse laws - Federal laws prohibit a health care provider from paying or receiving a kickback or other unlawful benefit to or from anyone for the referral of a patient or for the purchase of health care products or services. Such laws apply not only to physicians and other health care professionals, but also to all types of referral sources, such as hospitals, nursing homes, case managers, workers' compensation attorneys, and any other individuals in a position to influence referrals or purchases. They cover both:

- The offer or payment of a kickback to secure referrals.
- The request or receipt of an unlawful benefit in exchange for agreement to purchase a health care product or service from a particular vendor or contractor.

Kickbacks or unlawful benefits can take many forms besides cash, including excessive gifts and entertainment or items or services not at fair market value.

Federal law also prohibits the use of gifts or other financial benefits to induce a Medicare patient to receive care at a Medical System Affiliate.

Antitrust and business competition - The Medical System will compete vigorously, but fairly, in the marketplace. Antitrust laws prohibit such activities as “unfair methods of competition” and agreements “in restraint of trade.” Examples of conduct prohibited by these laws include: agreements to fix prices and collusion (including price sharing) with competitors and boycotts (such as of certain payors). Questions relating to antitrust should be directed to the Office of General Counsel (Appendix A).

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.

- 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 (Appendix A).

Federal False Claims Act (FCA) - The federal FCA prohibits any entity from knowingly submitting false or fraudulent claims payable by the federal government and avoiding or decreasing an obligation to pay amounts to the federal government. "Knowingly" mean that a person (1) has actual knowledge; (2) acts in deliberate ignorance; or (3) acts in reckless disregard. Examples of the type of activity prohibited by the FCA include billing a federally funded program, such as Medicare or Medicaid, for services that were not provided, upcoding (i.e., billing for a highly reimbursed service in lieu of the service actually provided), or billing for medically unnecessary services. It also includes retaining overpayments received from a federally funded program.

Penalties for violation of the FCA include fines between \$5,500 and \$11,000 for each such claim submitted, regardless of the size of the false claim, plus up to three times the amount of the claim.

The FCA also protects individuals who report suspected fraud. Any person who lawfully reports information about actual or potential violations of the FCA, may not be retaliated against, demoted, suspended, threatened, or harassed for making such a report.

The FCA allows an individual to initiate a formal claim if he or she is the "original source" of the information. If any funds are recovered, a portion of the funds may be paid to the person who initiated the formal claim, at the discretion of a federal court. If a person wishes to file a claim regarding fraud or suspected fraud related to a health care payment directly with the government, he or she must first present a formal complaint, along with all material evidence relating to the alleged fraud, to the authorities at the U.S. Department of Justice. The authorities have sixty (60) days to investigate, during which time the complaint is kept confidential. Upon completion of the investigation, the government will decide either to pursue the case on its own or decline to proceed with the case.

Maryland Medicaid Fraud Law - Maryland has enacted a law similar to the federal False Claims Act that provides for criminal and civil remedies for the submission of false and fraudulent claims to the Medicaid program. Under the Maryland Medicaid Fraud law, it is a crime for an individual to knowingly and willfully attempt to defraud the Medicaid program in connection with the delivery of or payment for a health care service; or obtain or attempt to obtain by means of false representation anything of value in connection with the delivery of or payment for a health care service through the Medicaid Program.

Penalties for violating the Maryland Medicaid Fraud law include imprisonment, fines and civil penalties of up to three times the amount of the overpayment.

Maryland law protects employees from retaliation if they, in good faith, disclose to a supervisor or board any potential violation of state or federal law.

Each Affiliate has a policy that explains the Federal and Maryland False Claims Acts in more detail.

Working environment

STANDARD: The Medical System strives to maintain a work environment where employees and contractors are treated fairly and with respect, where they can perform their jobs safely and effectively, and where they are encouraged to realize their full professional 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 - Each employee should endeavor to deal fairly with the Medical System's customers, suppliers, and employees. Employees and contractors are expected to 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 - The Medical System values a diverse workforce and recognizes its contribution to creativity and business growth. The Medical System does not tolerate unlawful discrimination or harassment by or against its employees, contractors, patients, visitors or medical staff members. All employees and applicants for employment must be afforded equal employment opportunities without regard to race, ethnicity, sex, 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 escalate the level of interpersonal tension in any situation is not tolerated.

Workplace violence - Physical violence or threat of violence is never acceptable. This includes abusive or aggressive behavior intended to threaten or intimidate another person.

Impairment related to the use of alcohol or drugs - Employees and contractors are expected to be 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 - Employees and contractors are expected to conform to applicable state professional practice acts and professional codes of ethics at all times.

Health and safety - All employees and contractors are expected to be familiar with the potential hazards in their workplace and to 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 - Federal and state laws regulate the handling and disposal of many infectious materials. Employees and contractors will properly dispose of blood and other bodily fluids, used needles and syringes, potentially toxic chemicals, and other materials.

Accounting and financial reporting

STANDARD: All accounting entries and financial reports must be prepared accurately and on a timely basis in accordance with the company's internal policies and procedures. External financial reports should fairly and accurately reflect the operations and financial condition of the Medical System.

Record keeping and management - The Medical System is required to prepare and maintain accounts, books and other records that fairly reflect the results of business operations. All transactions must be properly authorized, recorded in the period in which they were executed and properly documented. Each employee is expected to be familiar and comply with Medical System record retention policies that apply to documents (both paper and electronic) in his or her 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.

Management controls - Employees and contractors are expected to assist in the development, execution and enforcement of effective internal controls to ensure that contracts, payments and other business transactions are properly authorized, conform to policies and procedures, and are recorded accurately.

Financial reports - All financial reports, accounting records, and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction. Financial reports must be prepared in accordance with generally accepted accounting principles and legal requirements. Cost reports must be completed accurately and in accordance with established procedures and applicable

Management of Medical System assets

STANDARD: Medical System employees and contractors are expected to manage Medical System assets and other resources honestly and wisely. Medical System assets should be used for business purposes. Proper authorization in accordance with policies must be obtained prior to the commitment of Medical System funds or the disposition of other Medical System resources.

Physical assets - Employees have a duty to protect and not misuse Medical System property, assets, equipment and supplies. Missing property, as well as any unusual circumstances, should be reported to a supervisor.

Financial assets - Medical System funds may never be diverted for personal use, even temporarily, or used for any purpose that is not authorized and approved in accordance with policies.

Confidential or proprietary information - In addition to physical and financial assets, The University of Maryland 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.

Use 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: Employees and non-employees in leadership positions should avoid conflicts, as well as the appearance of conflicts between their private interests and the interests of the Medical System.

A conflict of interest occurs if a business or personal relationship with another person or entity interferes with your ability to perform your duties for the Medical System in an objective manner such as:

- An employee steers business to a vendor in which he/she or a family member have a personal financial interest
- An employee conducts private business on Medical System time
- An employee accepts gifts, meals or entertainment in excess of normal business courtesy that may appear to obligate the Medical System to do business with a particular contractor or vendor
- He or she serves as an officer, director, partner or any other advisory capacity for a supplier, customer, partner, subcontractor or competitor of The University of Maryland Medical System

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.

If you have a question about whether a specific situation constitutes a conflict of interest, you should review the Disclosure of Financial Relationships policy and submit the associated questionnaire to Corporate Compliance.

Dealing with the media

STANDARD: In general, only Medical System's executive officers and specifically designated members of the corporate communications should speak to the media about the Medical System. Local media contacts by hospital personnel should be coordinated with the corporate communications department. See Appendix A for contact information.

Government filings and reports

STANDARD: The University of Maryland Medical System will endeavor to 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. Non-routine requests for information should be brought to the attention of the Office of General Counsel.

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.

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: All lobbying and other government advocacy carried out by or on behalf of the Medical System must conform to applicable federal and state regulations.

Lobbying - The federal government and many state governments impose rules on lobbying or other types of government advocacy activities. All lobbying and other legislative or public policy advocacy at the federal and state level must be approved by the SVP of External Affairs (Appendix A).

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.

Contacts by government agencies

STANDARD: The Office of General Counsel should be promptly notified (see Appendix A) if you or your hospital are contacted by a government agent in connection with an investigation.

Document the name of the agent, the agency, the subject of the investigation and any other relevant information. This will allow the Medical System attorneys to contact the agent to establish a basis for cooperating with the investigation. If the agent wishes to arrange a personal interview with you, the Medical System attorneys can explain your rights and obligations and respond to any questions.

No employee may destroy or alter a Medical System document or record 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

People / Departments

Affiliate Level

Department	Contact Persons	E-mail	Phone
Hospital Compliance Officer	Jim Hursey	jhursey@umm.edu	443-643-2404
Privacy Officer	Tina Hornung	thornung@umm.edu	443-643-2466
Human Resources	Susan Harrison	sharrison@umm.edu	443-643-3410
Quality	Jane Gordon	jgordon@umm.edu	443-643-2510
Finance	Steve Bowman	sbowman@umm.edu	443-843-5588
Compliance & Privacy	Debbie Bittle	dbittle@umm.edu	443-643-3100
Communications	Martha Mallonee	mallonee@umm.edu	443-643-4219

Policy Locations: [UCHS Intranet Compliance & Corporate Ethics, and HIPAA Websites]

System Level

Department	Contact Persons	E-mail	Phone
Corporate Compliance	Chief Compliance Officer	compliance@umm.edu	410-328-3889
Office of General Counsel (aka legal)	Aaron Rabinowitz, VP, General Counsel, UM- UCHS	arabinowitz@umm.edu	443-643-3374
Corporate Communications	Mary Lynn Carver	mlcarver@umm.edu	410-328-6776
Risk Management	Sue Kinter	skinter@mmcip.umm.edu	410-328-1770
Government Affairs	Donna Jacobs	djacobs@umm.edu	410-328-7410

APPENDIX B: University of Maryland Medical System Corporation Affiliates

University of Maryland Medical System Corporation includes the following Affiliates:

- Baltimore Washington Medical Ctr
- Chester River Hospital Center
- Civista Medical Center
- James Lawrence Kernan Hospital
- Maryland General Hospital
- Shore Health System
- Mt. Washington Pediatric Hospital
- University of Maryland St Joseph Medical Center
- University of Maryland Medical Center
- Upper Chesapeake Health System
- Other affiliates identified below

36 South Paca Street, LLC	O’Dea Medical Arts Limited Partnership
Advanced Imaging at St. Joseph Medical Center, LLC	OLP, LLC
Baltimore Washington Emergency Physicians, Inc.	Shipley’s Choice Medical Park, Inc.
Baltimore Washington Health Enterprises, Inc.	Shore Clinical Foundation, Inc.
Baltimore Washington Medical System, Inc.	Shore Emergency Services Foundation, Inc.
Care Health Services, Inc.	Shore Health Enterprises, Inc.
Chester River Health Foundation, Inc.	SJMC Physicians, LLC
Chester River Health System, Inc.	SJMC-RA, LLC
Chester River Home Care & Hospice, LLC	Terrapin Insurance Company
Chester River Manor, Inc.	UCH/UMMS Venture, LLC
Civista Care Partners, Inc.	UCHS/UMMC Real Estate Venture, LLC
Civista Health Foundation, Inc.	UMSJ Health System, LLC
Civista Health, Inc.	UMSJ Properties, LLC
CMROC, LLC	UniversityCare, LLC
Maryland General Health Systems, Inc.	University of Maryland eCare, LLC
Maryland Medicine Comprehensive Insurance Program Self Insurance Trust	University of Maryland Medical System Foundation, Inc.
Memorial Hospital Foundation, Inc.	University of Maryland Regional Professional Services, LLC (d/b/a Towson Sports Medicine)
MHF – Federal Street, LLC	University of Maryland Regional Supplier Services, LLC (d/b/a University of Maryland St. Joseph Medical Equipment)
Mt. Washington Pediatric Foundation, Inc.	University of Maryland St. Joseph Foundation, Inc.
North Arundel Development Corporation	University of Maryland St. Joseph Medical Group, LLC
North County Corporation	University of Maryland St. Joseph Orthopaedics, LLC

RECOGNIZE • RESPOND • REPORT

COMPLIANCE QUESTIONS

WAYS TO REPORT

IN PERSON

- Your Supervisor
- Higher-Level Manager
- Hospital Compliance Officer
- Hospital Privacy Officer
- Email: compliance@umm.edu

Hospital Deputy Compliance
Officer

Name: Debbie Bittle

Contact: DBittle@uchs.org
443-643-3100

ANONYMOUSLY

- Internal Hotline 410-328-3889 (DUTY)
- Toll-Free Hotline 1-877-300-3889 (DUTY)
- Online www.reportIT.net

Username: UCHS

Password: UCHS

Hospital Privacy Officer

Name: Tina Hornung

Contact: Thornung@uchs.org
443-643-2466

WE WANT TO HEAR FROM YOU

Help Us Improve

Standards of Business Conduct Receipt Form

I have read and understand the Standards of Business Conduct for University of Maryland Medical System (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 the content of 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 anytime.

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
