



# Code of Conduct

Our Commitment to Compliance, Quality and Integrity



**BROWARD HEALTH®**



## *A Message from Leadership*

Since 1938, Broward Health has been improving the health and well-being of our community. As we celebrate the 85<sup>th</sup> anniversary of our healthcare system, it's also a time to reflect on our long-standing reputation of healthcare excellence and our commitment to maintaining the highest standards of ethical and professional conduct.

To demonstrate our healthcare system's culture of compliance, we are pleased to introduce Broward Health's Code of Conduct. This comprehensive guide serves as a foundation of our healthcare system's Compliance Program, and it outlines ethical standards that we are all expected to uphold every day.

Serving our patients with honesty and integrity is at the heart of everything we do. Although we all serve in various roles at Broward Health, everyone is held to the same standard of ethics, including Board members, executives, medical staff, management, employees, contractors, and volunteers.

Please take a moment to read and understand our comprehensive Code of Conduct. It addresses many compliance-related issues you may face in your workday, as well as tips, proper protocols, and available resources. Broward Health's culture of compliance depends on all of us, and we must all hold each other accountable to report any practices or conduct that may violate Broward Health's compliance standards. If you see something that raises an issue, you can report it without any fear of retaliation.

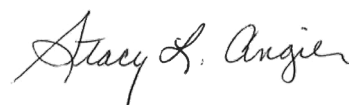
By committing to the standards outlined in our Code of Conduct, we can ensure our patients are cared for with the highest level of integrity. If you have any questions about our Code of Conduct, please reach out to our Corporate Compliance & Ethics Department by calling 954.473.7500 or by emailing [Compliance@BrowardHealth.org](mailto:Compliance@BrowardHealth.org).

Thank you for upholding our Code of Conduct and for your commitment to living out our values every day.

Sincerely,



Shane Strum  
President/Chief Executive Officer  
Broward Health



Stacy Angier  
Chair  
North Broward Hospital District  
Board of Commissioners

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# Our Mission, Vision, Guiding Pillars and Five Star Values

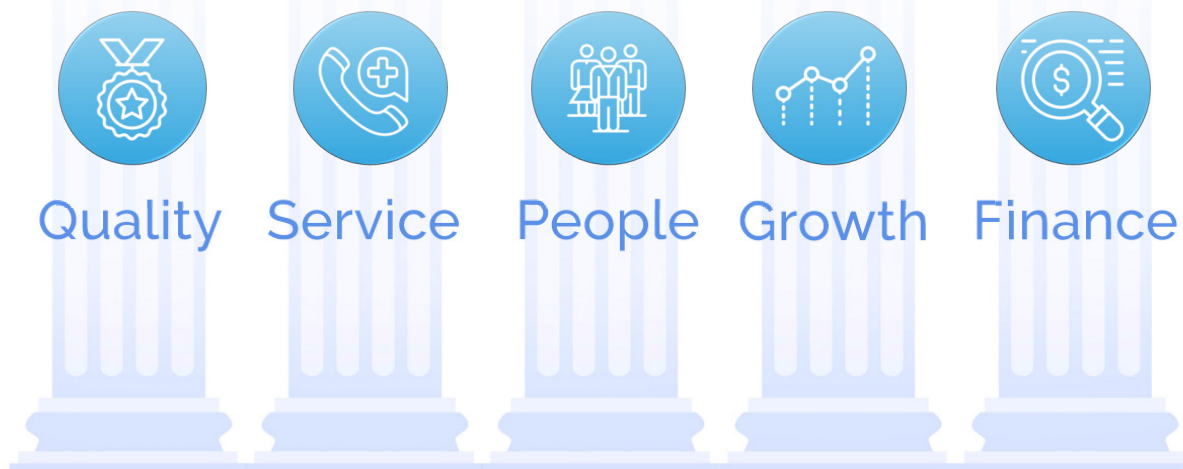
## MISSION

*The mission of Broward Health is to provide quality healthcare to the people we serve, and support the needs of all physicians and employees.*

## VISION

*The vision of Broward Health is to provide world-class healthcare to all we serve.*

## GUIDING PILLARS



## BROWARD HEALTH'S FIVE STAR VALUES

- ★ *Accountability for positive outcomes*
- ★ *Exceptional Service to Our Community*
- ★ *Fostering an Innovative Environment*
- ★ *Collaborative Organizational Team*
- ★ *Valuing our Employee Family*

A photograph of a woman with dark hair and glasses, smiling and looking towards a man whose back is to the camera. They appear to be in a professional setting. The image is partially covered by a blue circular graphic on the right side.

# Introduction

*The North Broward Hospital District d/b/a Broward Health ("Broward Health"), a Florida special taxing district and public and not-for-profit hospital system governed by the Board of Commissioners of North Broward Hospital District (the "Board") composed of seven (7) commissioners appointed by the Governor of Florida. Pursuant to the Board's authority over Broward Health, this Code of Conduct has been adopted based on guidance provided by Office of Inspector General, U.S. Department of Health and Human Services.*

## Our Compliance Program:

- Demonstrates Broward Health's commitment to the highest standards of compliance and ethics among all workforce members, physicians, contractors and agents within the healthcare system.
- Advances significantly the prevention of fraud, waste, and abuse at Broward Health, while at the same time furthering the fundamental mission of providing enhanced care to our patients for the betterment of the community.

## Our Code of Conduct:

- Serves as a guide, outlining individual and collective responsibilities under the Compliance Program and facilitating compliance with legal and ethical standards.
- The Board has adopted this Code of Conduct that applies to all Board members, officers, employees, agents, independent contractors, volunteers, as well as anyone who provides goods or services or who does business with or on behalf of Broward Health.
- Reinforces the fact that every covered person and entity has an affirmative duty to report actual or suspected compliance issues and is protected from any form of retaliation for reporting timely and in good faith. Please note that while reporting will not exempt anyone from the consequences of wrongdoing they commit, timely and thorough self-reporting will be a factor when sanctions are being considered.

For questions or concerns related to a compliance issue, please contact the Corporate Compliance & Ethics Department ("Corporate Compliance") at **954.473.7500** or the Compliance Hotline at **1.888.511.1370**.

## Compliance Program Elements

### Written Policies, Procedures and Standards of Conduct

Broward Health's Compliance and Ethics Written Standards includes our Code of Conduct and Broward Health's policies and procedures. The Code of Conduct is reviewed bi-annually and approved by the Board and sets forth the legal and ethical standards. The policies and procedures provide information on specific compliance and ethics topics and focus on the operational aspects of the Compliance Program and include:

- Information pertaining to training
- Hotline operations, auditing, and monitoring requirements
- Duty to report and protection from retaliation
- Sanction screening
- Document retention, Code of Conduct review, and revisions
- Conflicts of interest

### Compliance Officer and Compliance Committee

The role of the Chief Compliance Officer is to develop, oversee, implement, audit, and monitor the compliance requirements of Broward Health Compliance Program and Broward Health's compliance with the requirements of Federal and State Health Care Programs. The Chief Compliance Officer reports to the Board and the Board's Compliance & Ethics Committee, works closely with the Chief Executive Officer and the Broward Health management team, and chairs Broward Health's Compliance & Ethics Committee.

## *Compliance Program Elements Continued*

### **Effective Training and Education**

Broward Health requires ongoing and regular educational and training programs to ensure all employees are familiar with its Compliance Program and Code of Conduct, and understand the fraud and abuse laws, as well as the requirements imposed by Medicare, Medicaid, and other applicable government and commercial third-party payers. Health Insurance Portability and Accountability Act (HIPAA) training is also required. New and existing employees will be required to complete an educational program regarding Broward Health's Compliance Program and shall be informed of its compliance standards and policies. Copies of the policies are available to all employees. Timely completion of these training programs is mandatory.

### **Effective Lines of Communication**

Broward Health's Compliance Program has procedures for reporting, investigating, and responding to actual or suspected violations of compliance with the laws, regulations, and corporate values that govern our work. Employees, and others, as applicable, are required to report any actions or conduct they believe do not adhere to our standards, policies, procedures, or values of honesty and fairness. Reports may be made to management or directly to the Chief Compliance Officer. The Compliance Hotline is also available for anonymous reporting, if necessary.

### **Effective Systems for Auditing and Monitoring**

Broward Health audits and monitors its operations to help verify the accuracy of information submitted, compliance with applicable rules and regulations and overall effectiveness of the Compliance Program. Auditing efforts typically are conducted by objective parties, while monitoring is an ongoing management function that focuses on the accuracy and effectiveness of current operations. In addition, Broward Health regularly monitors adherence to its compliance policies to verify whether such policies are being followed and effectively enforced.

### **Enforcement of Well-Publicized Standards**

Employees and those doing business at, or on behalf of, the organization are required to comply with all compliance policies and standards, and all federal and state laws and regulations applicable to the performance of his or her duties. If an employee is involved in a questionable activity, the employee will be treated fairly and given an opportunity to explain his or her actions. If it has been determined that an employee has violated any provision of the compliance standards or policies or has engaged in conduct that violates a state or federal law or regulation, the employee is subject to disciplinary action up to, and including, termination.

### **Procedures and Systems for Prompt Responses to Detect Offenses**

Employees and those doing business at, or on behalf of, the organization are required to promptly report upon discovery all suspected or actual violations of Broward Health's Corporate Compliance and Ethics Requirements or Applicable Federal and State Requirements.

The Chief Compliance Officer, or the Chief Compliance Officer's designee, upon becoming aware of suspected non-compliance, will investigate the matter in question to determine whether a violation has occurred, and if so, take steps to verify that the problem is appropriately reported, addressed, and corrected. Internal investigations can include interviews and/or a review of relevant documents. Outside counsel, auditors, or healthcare experts may be called upon to assist in the investigation.

After an offense or violation of the compliance standards or policies has been detected, Broward Health will take all reasonable steps to respond appropriately to the situation and to prevent further similar offenses or violations from recurring. This includes making necessary modifications to the Compliance Program.

All reports of potential violations of laws, regulations, policies, or questionable conduct, from any source, shall be logged and maintained by the Compliance Officer. Records of the investigation will contain documentation of the alleged violation, a description of the investigative process, copies of interview notes and key documents, including but not limited to, a log of the witnesses interviewed, the documents reviewed, and the results of the investigation (e.g., any disciplinary action taken and the corrective action implemented).



# Compliance Program Principles

## QUALITY OF CARE AND SERVICE

***At Broward Health, we put patients first. Delivering high-quality care starts with developing strong patient relationships. We are dedicated to protecting our patients' rights and ensuring they play an active role in all decisions regarding their medical care.***

To ensure quality of care and service, we will:

- Act in accordance with the provisions of the Patient Bill of Rights.
- Honor the dignity and privacy of our patients and treat them with consideration, courtesy and respect.
- Provide care that conforms to acceptable clinical and safety standards.
- Have a qualified practitioner properly evaluate every patient before initiating a treatment plan.
- Provide appropriate care to our patients without regard to race, color, national origin, gender, gender identity or gender expression, pregnancy, sexual orientation, religion, age, disability, military status, genetic information or any other characteristic protected under applicable federal or state law.
- Provide the same level of service and care to all patients, regardless of a person's ability to pay.
- Provide patients who present with emergency medical conditions with a screening examination and stabilization in accordance with applicable laws, rules and regulations.
- Transfer a patient only after that person has been medically stabilized and an appropriate transfer has been arranged.
- Maintain accurate and complete records of patient information to fulfill the requirements set forth in our policies, accreditation standards and applicable laws and regulations.
- Always verify that only qualified people provide treatment to patients.
- Maintain professional licenses, certifications or other credentials, in accordance with the requirements of the corresponding position and function.
- Continuously strive to cultivate a culture of patient safety, reporting errors or near misses in a timely manner to the appropriate officials.



## Let's Be Clear

Providing quality and compassionate care for all patients is our prime directive.

## Let's Be Clear

It is important to know and understand all laws, rules, regulations and policies that impact Broward Health and be able to identify when a potential or actual violation may be occurring. Any potential or actual violations must be reported immediately.



## COMPLIANCE WITH LAWS AND REGULATIONS

***At Broward Health, we follow the letter and spirit of applicable laws and regulations and conduct our business ethically and honestly. We perform our duties in a manner that enhances Broward Health's standing in the community as a compliant and caring organization.***

To ensure compliance with laws and regulations, we will:

- Report any practice or condition that may violate any law, rule, regulation, safety standard, policy or the Code of Conduct to appropriate levels of management, the General Counsel or Corporate Compliance.
- Demonstrate honesty, integrity and fairness when performing job duties.
- Make every effort to prevent, detect and report any fraudulent, wasteful or abusive activity that may affect our resources or interactions with federal, state or local governments.
- Adhere to all applicable laws, regulations and professional standards regarding financial reporting and disclosures.
- Submit accurate claims and reports to federal, state and local governments and other payers.
- Refrain from giving or receiving any form of payment, kickback or bribe to induce the referral or purchase of any healthcare service.
- Refrain from offering any improper inducement or favor to patients, physicians or others to encourage the referral of patients to our facilities.
- Refrain from accepting improper inducements or favors from vendors to influence our patients or others connected with Broward Health to use a particular product or service.
- Inform vendors of our policies regarding ethical business conduct and compliance with law, as well as our expectation for vendors to act in accordance with such law and policies.
- Inform vendors who are our business associates of their requirements under HIPAA to safeguard information and report security breaches.
- Verify that contracts for services to be provided to Broward Health comply with the Anti-Kickback and Stark laws, ensuring that all payments made by Broward Health are supported by appropriate documentation.
- Fully comply with the Sherman Act, FTC Act, and all other applicable antitrust laws by, among other things, refraining from entering into agreements or engaging in other conduct that may unreasonably restrain competition or trade and by refraining from engaging in unfair or deceptive methods of competition.
- Be aware of situations that may present potential antitrust issues and avoid inappropriate discussions with competitors regarding business issues. This includes prices for goods and services, salaries and benefits, payment rates and business plans.

- Market and advertise accurately, and in compliance with laws and regulations.
- Procure, maintain, dispense and transport drugs and controlled substances used in the treatment of patients according to applicable laws and regulations.
- Refrain from making any verbal or written false or misleading statements to a government agency or other payer.
- Refrain from pursuing any business opportunity that requires unethical or illegal activity.
- Provide reports or other information required by any federal, state or local government agency on time, accurately and according to applicable laws and regulations.

## Laws that Impact Our Work

**Anti-Kickback Statute:** Prohibits the exchange of (or offer to exchange) anything of value, to induce or reward the referral of federal healthcare program business. One purpose rule: If one purpose of remuneration is to induce referrals, the statute is violated, even if the payment or gift was also intended to compensate for legitimate professional services.

**Stark Law:** Prohibits a physician from making a referral to an entity for furnishing a "designated health service" for which payment may be made under Medicare or Medicaid if the physician (or an immediate family member) has a financial relationship with the entity (ownership, investment interest or a compensation arrangement).

**False Claims Act:** Makes it illegal to submit claims for payment from Medicare, Medicaid or another government payer that you know or should know are false or fraudulent. Examples include upcoding, billing for services not medically necessary or billing for services not provided. In addition, the fact that a claim results from a kickback or is in violation of the Stark law also may render it false or fraudulent, creating liability under the civil FCA as well as the Anti-Kickback Statute or Stark law.

**Antitrust Laws:** The Sherman Act, FTC Act, and other antitrust laws exist to ensure a thriving, competitive free market. The antitrust laws prohibit companies from engaging in unfair or deceptive commercial conduct and from engaging in conduct that unreasonably restrains competition and trade. Examples of prohibited conduct include: (i) agreements between competitors to fix the prices of the goods or services they sell; (ii) agreements between companies to divide up the markets in which the companies will operate (e.g., geographically or by product or service type); and (iii) agreements between companies to not solicit each other's employees or to fix wages or employee benefits.







## WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES

***At Broward Health, we treat each other with dignity and respect. Our workplace is nurturing and free of harassment. Our goal is to create and maintain a positive, engaged, and collaborative partnership and an inclusive work environment.***

In accordance with workplace conduct and employment practices, we:

- Expect all workforce members to follow Broward Health's Conduct Standards and exhibit behavior reflective of our five-star values, policies and processes as well as any laws, rules or regulations that apply to our specific roles. Disruptive behavior that intimidates others and affects morale will not be tolerated and will be addressed appropriately.
- Provide equal opportunity to all, regardless of race, color, national origin, gender, gender identity or gender expression, pregnancy, sexual orientation, religion, age, disability, military status, genetic information or any other characteristic protected under applicable federal or state law. It is Broward Health's position that harassing or discriminatory behavior only serves to undermine the integrity of the employment and/or patient relationship. For that reason, all employees, medical staff, vendors, and independent contractors are covered by and expected to comply with Broward Health's Anti-Discrimination/Harassment policy and take appropriate measures to prevent unlawful harassment and/or discrimination.
- Require any allegation of discrimination or harassment that is made known to any employee, medical staff, vendor or independent contractor of Broward Health, whether it occurs to him/herself or another employee, vendor, independent contractor, patient, visitor or medical staff be reported immediately to that employee's department manager and to the Regional Chief Human Resources Officer. A report of potential discrimination or harassment may also be made to the Office of Equity and Inclusion Hotline at **954.473.7323**. Notifying non-management personnel of allegations will not qualify as notification to Broward Health of potential harassment or discrimination (See Anti-Discrimination/Harassment policy).
- Should feel comfortable in respectfully sharing our opinions or asking questions, especially when it is related to ethical concerns or potential policy/regulatory violations. As a result, our management/ leadership team has a responsibility to create an open and supportive environment where employees feel comfortable raising questions or concerns.



- Employees are encouraged to address any concerns or issues with their leader or HR team as most concerns can be resolved at the regional level. If for any reason, it is not possible or an employee is not comfortable raising concerns with his or her leader, employees are encouraged to report the concern up the chain of command. System-wide resources and reporting mechanisms are also available through the Compliance Hotline. Workforce related concerns should be reported through the Department of Workforce Diversity, Inclusion and Advocacy Hotline.
- Screen all prospective workforce members to ensure they have not been sanctioned by any regulatory agency and are eligible to perform their designated responsibilities.
- Require workforce members to immediately disclose to their supervisor and/or Human Resources material facts regarding their own wrongdoing, arrest and/or criminal charges.
- Prohibit workforce members from manufacturing, distributing, dispensing, possessing or using illegal drugs or other unauthorized or mind-altering or intoxicating substances while on Broward Health property or while otherwise performing company duties away from Broward Health in accordance with our Drug and Alcohol-Free Workplace Policy and the Florida Drug-Free Workplace Program.
- Understand that while the use of prescription/over-the-counter medication is not prohibited, use of such medication must not impair an employee's ability to safely and effectively perform his or her job and should be documented with the Regional HR Employee Health Department.
- Commit to providing a safe and healthy environment for our patients, visitors and workforce members, and therefore prohibit the possession of firearms, weapons, explosive devices or other dangerous materials in our facilities. This does not apply to law enforcement officers who must be armed as a requirement of their position or appointment.
- Are not permitted, without prior approval, to distribute materials or to engage in any solicitation on Broward Health premises. We may not use e-mail, voicemail or facsimiles to solicit membership, sell items or obtain support for external businesses or organizations. Off-duty employees who remain on Broward Health premises for any reason other than official Broward Health business shall be subject to the rules applicable to non-employees.



## Let's Be Clear

Employees are expected to treat others with dignity and respect and comply with all applicable policies and laws. Harassment or discrimination of any form is not tolerated. We are an equal opportunity employer and want to encourage all employees to report any instances of potential harassment/discrimination or policy or regulatory violations to their manager or Regional HR department. Workforce related concerns may be reported to the Office of Equity and Inclusion Hotline at 954.473.7323.

## PROTECTION OF PATIENT AND PROPRIETARY INFORMATION

***Broward Health maintains the confidentiality of patient and other information in accordance with legal and ethical standards, and breaches will not be tolerated.***

To protect patient and proprietary information, we will:

- Establish confidentiality and privacy policies and procedures that adhere to the Health Insurance Portability and Accountability Act (HIPAA).
- Respect and protect patients' health and personal information in all forms, including paper, electronic, verbal, telephonic, social media, etc.
- Only access a patient's chart when involved in that patient's care or for a legitimate work-related reason such as billing, administrative, teaching or research requirements. Access is limited to only the minimum amount necessary to complete the related work.
- Refrain from revealing information unless it is supported by a legitimate clinical or business purpose need, in compliance with our policies and procedures and applicable laws, rules and regulations.
- Refrain from discussing patient information in public, including, but not limited to, elevators, hallways or dining areas.
- Maintain computer workstations responsibly and refrain from sharing computer identification information and passwords.
- Carefully manage and maintain confidential and proprietary information to protect its value.
- Refrain from disclosing other Broward Health financial information, including the healthcare system's financial performance and contract pricing for goods and services, without prior, appropriate approval.
- Refrain from using or sharing "insider information," which is not otherwise available to the general public.

## Let's Be Clear



To provide quality care and engender trust from our patients and those with whom we do business, Broward Health must maintain a confidential environment where patient and all proprietary information is protected.

## SOCIAL MEDIA

- Employees who choose to participate in social networking activities are responsible for their postings and should use good judgment. Broward Health has the right and duty to protect itself from unauthorized disclosure of information and protection of the organization's public image
- Blogging or other forms of social media or technology include but are not limited to video or postings, sites such as Facebook, Instagram, Tik Tok, Snapchat and Twitter, chat rooms, personal blogs or similar forms of online journals, diaries or personal newsletters not affiliated with Broward Health. Please refrain from using your personal social media during work hours or to satisfy your duty to report obligation.
- Employees may not publicly discuss and disclose information obtained due to their employment relationship or while performing their job duties and responsibilities. This includes but is not limited to patient information, employee information, active investigations, proprietary, strategic, and other non-public information.
- Employees are expected to comply with and adhere to legal and ethical laws and regulations and Broward Health's policies and procedures relating to their online activities.

## SECURITY AWARENESS

- Maintain computer workstations responsibly and refrain from sharing computer identification information and passwords.
- Refrain from allowing unknown users to access your computer workstation or network.
- Create strong passwords with at least 12 characters, one upper-case, one lowercase, a number, and a special character. Regularly change passwords to personal and office computers every 3 months.
- Being aware of potential threats and scams can help prevent security incidents. Do not download or install unknown software/freeware. Refrain from clicking on suspicious or unknown sender emails.
- Patient Information should not be stored or texted on your unsecured personal cell phone or personal laptop.
- Broward Health continuously updates all applications and operating systems. Assist with software updates on your computer when prompted.
- Always report suspicious activity by calling the Broward Health Service Center at **954.847.4357** or the Compliance Hotline at **888.511.1370**.

## RECORD RETENTION, STORAGE AND DISPOSAL

***It is Broward Health's duty to apply effective techniques to maintain complete and accurate Records to avoid the cost and burden of storage and retention. Workforce members should be routinely disposing of Records that do not serve an ongoing business purpose and are not otherwise required to be maintained by law or regulation.***

Records, Retention and Inventorying

- Records to be retained will be stored by Broward Health and shall be accessible for retrieval in the event of a Public Records request, litigation, or other business necessity.
- Records Coordinators are designated for each department, division, business region, group, or subsidiary of Broward Health. They are responsible for implementing and maintaining Records management programs.

- A Records Retention Schedule describes a Record Series and sets a minimum time for which the Records must be retained before final disposition can be made. Every Record Series must have an approved retention schedule in place before Records can be destroyed or disposed of. Regardless of whether the Records are Electronic Records, paper records, or another format in which they reside, retention periods are determined by the content, nature, and purpose of records and are set based on their legal, fiscal, administrative, and historical values.
- There are two types of retention schedules: General Records Schedules and Individual Records Schedules. General Records Schedules establish retention requirements for Records common to several or all government agencies, while Individual Records Schedules establish retention requirements for Records that are unique to Broward Health. To ensure the proper storage and disposition of Records, it is essential that proper inventories of Records be kept. Examples of a Record Series might be personnel files, project research files, equipment maintenance and repair records, or procurement files.
- In general, scanned images of Records can be designated as Master Records and the original hard copies can be designated as Duplicates and disposed of when no longer needed, provided that the Electronic Records are scanned at a minimum 300 dpi, use "a published International Organization for Standardization (ISO) open standard image format," are in compliance with Rule 1B-26.003, Florida Administrative Code, and the completeness and accuracy of the scanned copies have been verified. Once the Electronic Record is designated the Master Record, the Duplicate original Record may be disposed of at any time and the Electronic Record deemed the Master Record must be retained for the length stated in the applicable retention schedule.

## DISPOSITION OF RECORDS

- Records that have satisfied their legal, fiscal, administrative, and archival requirements shall be destroyed when: (1) the specified retention period has expired; (2) there is not an active Legal Hold or a tax/compliance audit prohibiting destruction; (3) an appropriate current Records Retention Schedule (either a General Records Schedule or an Individual Records Schedule) must be identified; and (4) a Records Disposition Document has been properly filled out and approved by designated Administrative leadership.
- Records must not be placed in trash receptacles unless the Records are rendered no longer recognizable.
- All destruction of Records shall be conducted in a manner that safeguards the interests of Broward Health and the safety, security, and privacy of individuals. In destroying Records containing information that is confidential or exempt from disclosure or that contains PHI, destruction methods that prevent unauthorized access to or use of the information and ensure that the information cannot practicably be read, reconstructed, or recovered must be employed.

## Let's Be Clear

To provide quality care and engender trust from our patients and those with whom we do business, Broward Health must maintain a confidential environment where patient and all proprietary information is protected.



For electronic records containing information that is confidential or exempt from disclosure or that contains PHI, appropriate destruction methods include physical destruction of storage media such as by shredding, crushing, or incineration; high-level overwriting that renders the data unrecoverable; or degaussing/demagnetizing. Failure to retain and preserve records in violation of state and federal law may have serious legal consequences for both Broward Health and the individual. Broward Health officers, employees, and agents are required to report any known violations of destruction to Corporate Compliance to enable Broward Health to investigate and take appropriate mitigation steps if necessary.

## CONFLICTS OF INTEREST

***Broward Health employees should avoid conflicts or the appearance of conflicts between personal interests or an outside interest and the interests of Broward Health.***

To avoid conflicts of interest, we will:

- Perform services and maintain business relationships to promote the best interests of Broward Health and our patients.
- Refrain from any activity, practice or act that creates an actual or apparent conflict of interest with Broward Health.
- Report actual or potential conflicts of interest to a direct supervisor and/or Corporate Compliance.
- Promptly and accurately complete any conflict of interest forms as required.
- Avoid placing business with any vendor of Broward Health, in which an employee or immediate family member may have a direct or indirect interest, employment or other financial relationship, unless the relationship is disclosed and approved according to policy.
- Avoid being involved in any enterprise that does business or competes with Broward Health when that connection might influence decisions or affect our ability to perform our job functions.
- Disclose promptly and timely to Corporate Compliance via the conflict of interest form or other appropriate means any situation where an employee may serve as a director, trustee or officer of an organization whose interest may compete or conflict with that of Broward Health.
- Refrain from participating, directly or indirectly, in decisions involving a direct benefit (e.g., initial hire, rehire, promotion, salary, performance appraisals, work assignments or other working conditions) for those related by blood or marriage or members of the same household, including domestic partners.
- Refrain from accepting cash or cash equivalent gifts (e.g., gift cards) in any amount from outside vendors provided in connection with employment.

## Let's Be Clear

It is important to remember that employees' actions must always reflect the best interests of Broward Health. Gifts should never be offered or accepted where the intent is to induce or reward someone for doing business with our organization or to try to influence an employee in planning a decision.

Gifts offered by patients or family members can be tricky because we never want the community to believe that great care is contingent upon the receipt of gifts.



## Let's Be Clear

Coding and billing must be based on what is contained in the medical record.

Billing errors that result in overpayments must be corrected immediately and overpayments must be refunded within 60 days of discovery. Under the Affordable Care Act, if overpayments are not refunded within 60 days, Broward Health may be subject to penalties under the False Claims Act.

- Recognize that we are not allowed to accept gifts, payments, fees for services, discounts, privileges or other favors that would or might appear to influence our duties at Broward Health. Items such as food, popcorn, cookies, etc. may be accepted on special occasions (e.g., during the holiday season or a celebratory week such as Nurses' Week or Hospital Week) provided they are infrequent, modest and shared among the entire department.
- Understand that upon receipt of a gift that is not permitted, the gift should be returned and reported to Corporate Compliance. If the donor refuses to take the gift back, Corporate Compliance will provide guidance as to next steps.

## BILLING AND REIMBURSEMENT

***Broward Health codes and bills based on what is contained in the medical record. Effective communication among clinicians, the coders and the billers is necessary to assure that accurate information is provided.***

In accordance with billing and reimbursement policies, we will:

- Code and bill accurately and document the services rendered and the amounts billed.
- Maintain complete and thorough records to fulfill requirements set forth in our policies and procedures, accreditation standards, and applicable laws and regulations.
- Code and bill only for services that were rendered.
- Bill in compliance with rules and regulations.
- Notify the payer of payment errors and process refunds promptly and accurately.
- Properly train staff and provide them with coding and billing updates in a timely manner.
- Bill in compliance with rules and regulations regarding teaching physicians and resident requirements at teaching hospitals.
- Act in accordance with law and established rules, policies and procedures in the rare occasion when patients' coinsurances and deductibles are waived.
- Continually evaluate coding and billing activities to identify areas for improvement, making special note of concerns identified by regulators (e.g., laboratory services, clinical trials, bad debts, transfers) to mitigate the risk of improper billing.
- Strive to identify errors, report them to a direct supervisor or Corporate Compliance, and correct them in a timely and appropriate manner.

## ENVIRONMENTAL STANDARDS AND WORKPLACE SAFETY

***Broward Health is committed to providing a safe and secure environment for patients, family members, workforce members, visitors and customers.***

To ensure environmental standards and workplace safety, we:

- Are in compliance with established safety and infection control laws and regulations, which are intended to prevent job-related hazards.
- Are consistent with ergonomic standards and maintain a safe work environment.
- Identify visitors and assist them in their travels through the system, recognizing and reporting any suspicious activity.
- Are in compliance with permit requirements that allow for the safe discharge of pollutants into the air, sewage systems, water or land.
- Are in compliance with all laws and regulations governing the handling, storage, use and disposal of hazardous materials, infectious wastes and other pollutants.
- Exercise good judgment with regard to the environmental aspects of the use of Broward Health buildings, property, laboratory processes and medical products.
- Encourage the reporting of any violation of safety policies and procedures, laws, regulations or standards to a manager or supervisor. If an employee is not satisfied that the issue has been addressed, they should notify the Risk Management Department or Corporate Compliance.
- Require the use of identification badges. If asked, workforce members will identify themselves by name and department.

## Let's Be Clear



**We must all work together to ensure the safety and security of patients, workforce members and third parties in all Broward Health activities.**





## PROTECTION OF BROWARD HEALTH ASSETS

***We are expected to use company assets judiciously and in accordance with established policies and procedures. Improper or unauthorized use is prohibited. Accordingly, we will correctly use and care for all property and equipment entrusted to us including the property of third parties.***

To protect Broward Health assets, we will:

- Maintain internal controls within our areas of responsibility to safeguard Broward Health's assets and verify the accuracy of financial statements and all other records and reports.
- Use Broward Health property appropriately and take measures to prevent any unexpected loss of equipment, supplies, materials or services.
- Report time and attendance accurately and work productively while on duty.
- Use Broward Health's funds and maintain accurate records and documentation consistent with Broward Health's policies and state and federal law.
- Issue and maintain financial reports, accounting records, research reports, expense accounts, time sheets and other documents that are accurate and clearly reflect the true nature of transactions.
- Refrain from patient copyright infringement on Broward Health's intellectual property.

## Let's Be Clear



**We have a fiduciary responsibility to protect all of Broward Health's assets and to use them appropriately and in furtherance of our mission.**



## REPORTING ISSUES OR CONCERNS

***In the spirit of the Broward Health Code of Conduct, we work as a team to maintain the highest standards of compliance and ethics.***

To address reporting issues or concerns, we:

- Are required to report any issue that we, in good faith, believe violates or may violate Broward Health's Code of Conduct, Broward Health's policies and procedures, or any applicable laws, rules or regulations.
- Must not engage in illegal retaliation, retribution or harassment against anyone for reporting misconduct, provided that the report was made in good faith.
- Understand that deliberately making a false accusation with the purpose of harming or retaliating against someone is not tolerated.
- Will seek guidance from any of the below if there is a question or concern about a situation that we believe is illegal or unethical:
  - Manager
  - Compliance Officer or any member of Corporate Compliance
  - Chief Human Resources Officer
  - General Counsel
- Understand that management is responsible for responding to issues or concerns identified by employees.  
If a manager is unable to respond to an employee, they are encouraged to seek guidance from a superior and, if necessary, Corporate Compliance.
- Understand that management is also responsible for maintaining a workplace environment where employees or others are comfortable raising issues or concerns or just asking questions.
- Understand that managers are responsible for verifying that their employees understand and adhere to responsibilities under the Compliance Program.

***The Compliance Hotline, managed by a third party, is available for employees should they wish to make an anonymous compliance report. The toll-free 24/7 hotline can be reached by calling 1.888.511.1370.***

## Let's Be Clear

We have an affirmative duty to report actual or suspected violations of law, regulation, or the Code of Conduct and are protected from retaliation for reporting timely and in good faith. Self-reporting is encouraged and will be a factor when disciplinary action is being considered. Failure to report may be subject to disciplinary action.

## INFORMATION FOR VENDORS

***The goods and services provided by our vendors and/or their representatives are an integral part of Broward Health's mission to provide quality healthcare to the community we serve. This Code of Conduct outlines Broward Health's expectations of all vendors and their representatives For purposes of this Code a vendor is defined as any sole proprietor, partnership, company, corporation, entity, or individual representing any of the foregoing, that provides services and/or goods to the hospital and/or physician of a hospital, or any person representing a manufacturer or distributor of products.***

### Compliance with Laws

Broward Health expects its vendors and their representatives to fully comply with all federal, state, and local laws and regulations in their business activities. These include, but are not limited to, the Anti-Kickback statute, Health Insurance Portability and Accountability Act of 1996 (HIPAA), Florida Information Protection Act (FIPA), False Claims Act, and Stark law.

### Credentialing

Vendors and their representatives must be familiar with Broward Health's visitation policy and must be credentialed prior to entering a Broward Health facility.

Upon entering a Broward Health facility, vendor and/or its representatives must sign-in using the Intellicentrics system and must always maintain identification.

Additionally, vendor may only access areas where they have been granted proper access. Vendor may not enter any inventory or supply room unless escorted by a member of Broward Health's staff. Vendors should attend one of the quarterly orientation sessions which provide detailed information on how to conduct business with Broward Health.

## Conflicts of Interest

Conflicts or the appearance of conflicts between a vendor and any Broward Health workforce member should be avoided. Vendors are expected to timely notify Broward Health of any potential conflict of interest so that Broward Health can attempt to mitigate or resolve the conflict.

## Gifts

Vendors should not exchange or offer gifts or gratuities with any workforce member that could induce or give the appearance of inducing business with Broward Health.

## Cone of Silence

Broward Health prohibits communication to/or from any member of the Board or any Broward Health official, department, division, or employee during the formal bid submission process, except as otherwise provided in Broward Health's formal bid template. Communications initiated by a Vendor to any other Broward Health commissioner, officer, employee, or agent regarding a Request For Proposal (RFP) may be grounds for disqualifying the offending Vendor from consideration for an award of a contract and/or any future bids or proposals from Vendor.

## Eligibility to Participate in State and Federal Healthcare Programs

Broward Health does not conduct business with any individual or organization that has been excluded, debarred, or is ineligible from participating in federal or state health care programs. Vendors should notify Broward Health immediately if they are placed on an exclusion list by the OIG.







**BROWARD  
HEALTH<sup>®</sup>**

Corporate Compliance  
& Ethics Department

1800 N.W. 49th Street, Fort Lauderdale  
954.473.7500

**[BrowardHealth.org](http://BrowardHealth.org)**