

<b>Beth Israel Deaconess</b> CARE ORGANIZATION	Policy # BIDCOACO-COMP-002	Effective Date: 2018	Revised Date: -
	Title: <b>Code of Conduct</b>		Owner: Compliance Officer
	Approved By: BIDCO Sr. Leadership		Date: January 2018

**APPLICABILITY:** This policy is applicable to all BIDCO Employees, Managers, Officers, and Reporting Physicians unless exempted by the Conflict Review Committee.

**POLICY:** BIDCO operates in accordance with high legal, moral, and ethical standards and with all applicable laws, regulations, and standards. BIDCO will not tolerate false statements by employees to a government agency or other payer. Deliberate misstatements to government agencies or other payers will be grounds for disciplinary action. BIDCO will not pay employees, physicians, or health care professionals for referral of clients, or accept payments for referrals we make. BIDCO will ensure that all reports or other information required by any federal, state, or local government agency are filed timely, accurately, and in conformance with the applicable laws and regulations. BIDCO will not engage, either directly or indirectly, in any corrupt business practice, including bribery, kick-backs or payoffs, intended to induce, influence, or reward favorable decisions of any client, contractor, vendor, government personnel, or anyone in a position to benefit us in any way.

BIDCO will not hire or contract with any individual or entity that is currently excluded, suspended, debarred, or otherwise ineligible to participate in the federal health care programs or has been convicted of a criminal offense related to the provision of health care items or services and has not been reinstated in the federal health care programs after a period of exclusion, suspension, debarment, or ineligibility.

**DEFINITIONS:**

“ACO” refers to Beth Israel Deaconess Care Organization (the "ACO").

**BACKGROUND:**

This Code of Conduct has been adopted by the BIDCO’s BIDCO Board of Managers as part of BIDCO’s Compliance Plan in order to provide standards by which all members, partners, participants, participant employees, managers and contractors will conduct themselves. BIDCO is fully committed to conducting its activities in compliance with all federal, state and local laws and regulations and in conformance with the highest standards of business integrity. Individual conduct must be in a manner that protects and promotes integrity and enhances BIDCO’s ability to achieve its organizational mission. The Code of Conduct is intended to serve as a guide to help all to whom it applies to make sound ethical and legal decisions during their day-to-day activities so we can ensure we achieve the level of compliance required by law. The standards and principles contained in this Code of Conduct apply to all BIDCO members, partners, participants, participant employees, managers and contractors. The BIDCO Board of Managers fully embraces the concepts contained herein and has formally adopted this Code of Conduct as the policy of BIDCO. It is a requirement of all members, partners, participants, participant employees, managers and contractors to fully

adhere to the Compliance Plan and Code of Conduct at all times. Failure to comply can have serious consequences for BIDCO and for those who do not comply.

**Conflicts of Interest**

In accordance with Policy # BIDCOACO-COMP-002, all employees will perform their duties on behalf of BIDCO in a truthful and loyal manner. All employees and Managers will avoid any actions that may be reasonably construed to cause an actual or potential conflict of interest with their responsibilities.

**Billing and Coding Integrity**

BIDCO and its participants will require accurate bills, which include only services actually rendered, using billing codes that accurately describe the services, and are based on documented medical necessity. BIDCO and its participants will take every reasonable precaution to ensure that billing and coding is accurate, timely, and in compliance with federal and state laws and regulations. BIDCO will not tolerate the submission of any claims that contain any kind of false, fraudulent, or inaccurate statements. It has adopted policies and procedures to prevent and detect fraud, waste and abuse that are in compliance with both federal and state law. Any employee who lawfully reports a concern is protected from retaliation by these same policies, as well as federal and state laws governing false claims.

**Privacy and Security of Information**

BIDCO will take every precaution to ensure the confidentiality, integrity, and availability of the information it collects and uses for health care and business purposes. The confidentiality protection extends to all information, regardless of location or storage medium, and it applies to both paper and electronic-based information.

**Related Policies**

BIDMC Personal Gifts, Travel, Meals, and Entertainment Policy (Policy #: ADM-17A).

BIDMC Conflict of Interest Policy for Institutional Transactions Policy (Policy #: ADM-18).

BIDMC Code of Conduct

**History**

<b>Version No.</b>	<b>Approved By</b>	<b>Date</b>	<b>Action Taken (revision, retirement, etc.)</b>
One	BIDCO Leadership	January 2018	Approval