



NEW YORK CITY HEALTH AND HOSPITALS CORPORATION

STAY INFORMED

You can call the COMPLIANCE HELP LINE if you have questions about policy, ethics, or rules that apply to the following areas:

- Billing, accounting and record keeping
- Conflicts of interest
- Customer and vendor relations
- Discrimination, sexual harassment and retaliation
- Patient care and confidentiality
- Safety, health and environmental issues
- Improper business arrangements (e.g., leases)

If at any time you are concerned about a situation that appears to be illegal or unethical or if something you are being told doesn't "sit right" with you, it is your responsibility to report your concerns.

You should seek guidance from your supervisor first. If for any reason you are unable to speak to your supervisor, or don't feel comfortable speaking with your supervisor, contact any member of the Compliance Team, or make an anonymous report to the toll-free COMPLIANCE HELP LINE at:

1-866-HELP-HHC
(1-866-4357-442)



NEW YORK CITY HEALTH AND HOSPITALS CORPORATION

Created and Designed by: Office of Communications and Marketing
Office of Legal Affairs
Office of Corporate Compliance
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PRINCIPLES OF PROFESSIONAL CONDUCT

BASIC PRINCIPLES OF PROFESSIONAL CONDUCT

The Basic Principles of Professional Conduct is a guide to help all HHC employees make sure they conduct official business in a manner that is both lawful and ethical. You must comply with the rules that apply to health care operations and to your particular duties. In most cases, we are proud to say that our employees willingly adopt and uphold our standards.

Sometimes, however, employees make mistakes because they are not aware of the rules. We urge you to make sure you know and understand all the rules and policies that apply to your work. If you do not know what rules apply to you, talk to your supervisor.

WHAT HAPPENS IF YOU VIOLATE THE BASIC PRINCIPLES OF PROFESSIONAL CONDUCT?

- Employees who knowingly break HHC rules or a state, federal or local law are subject to disciplinary action up to and including dismissal.

EMPLOYEE PROTECTION FROM RETALIATION

- HHC strictly prohibits retaliation, in any form, against any individual making a report, complaint, or inquiry in good faith, concerning suspected fraud, waste, and abuse or other suspected violation of law or HHC policy will be subject to disciplinary action up to and including dismissal.

EXAMPLES OF VIOLATIONS OF PROFESSIONAL CONDUCT

- Improper billing practices, including but not limited to:
 - Billing for items or services not rendered.
 - Upcoding - Using a billing or DRG code that provides for a higher payment rate than the correct code.
 - Submitting multiple claims for a single service or submitting a claim to more than one primary payer at the same time.
 - Submitting false cost reports.
 - Unbundling - submitting claims in a piecemeal or fragmented way to increase payment for tests or procedures that should be billed together.
 - Providing medically unnecessary services.
 - Retaining any overpayments.
- Submitting false statements or certifications in business dealings.
- Accepting gifts or services from a vendor. Unlawfully donating hospital funds, services and products, or other resources to any political cause, party or candidate.
- Giving or receiving anything of value for Medicare or Medicaid referrals.
- Improper disclosure of confidential patient information.
- Any violation of HHC policies concerning patient care or advance directives.

Please complete the below Statement of Understanding and return it to your Human Resources Department. The signed statement will be placed in your personnel file.

BASIC PRINCIPLES OF CONDUCT STATEMENT OF UNDERSTANDING

I certify that I have read and understand the Basic Principles of Professional Conduct and agree to abide by it during the entire term of my employment. I acknowledge that I have a duty to report any alleged or suspected violation of the Basic Principles of Professional Conduct. Unless otherwise noted below, I am not aware of any violation of the Basic Principles of Professional Conduct.

Signature: _____

Date: _____

Print/Type Name: _____

Position/Department _____

Employee Number: _____