

Code of Conduct



Purpose

This Code of Conduct is a statement of the Hospital for Special Care's commitment to compliance. It describes our commitment to comply with laws that affect our organization and to ethical principles that guide us as we carry out our day-to-day operations.

As members of the Hospital for Special Care community, we are expected to act in a way that is true to our vision, mission, values and Code of Ethics. The core values we aim for are caring, integrity, and the pursuit of excellence. Based on these guiding principles, this Code of Conduct is meant to help you understand how we define responsible behavior at all levels of our organization.

Responsible behavior means making the right choice, even when it is not the easy solution.

Our Code of Conduct cannot cover every situation in detail. Further guidance is provided on specific subjects in the Standards of Conduct and supporting policies and procedures.

What is Expected of Me?

We require every member of our community to follow the Code of Conduct, Standards of Conduct and our policies and procedures.

This includes all employees, members of our board of directors, officers, medical and clinical staff members,

students, volunteers, contractors, and other individuals or organizations connected with Hospital for Special Care.

We have a duty to ask when it is not clear - what is the right choice? We have a duty to ask this when a situation seems to violate a legal or ethical obligation. We have a duty to report to management any actual or possible violation. There will be no retaliation or retribution against someone who asks questions or reports a possible violation in good faith. To the extent possible, the Hospital will keep the name of the person making a report confidential while the report is investigated. Anyone who makes a false report for the purpose of harming or retaliating against another person will be subject to discipline.

Anyone who fails to comply with the Code of Conduct, Standards of Conduct and our policies and procedures may be disciplined, up to and including termination.

It is important that compliance questions or problems be brought to our attention as soon as possible. Compliance is in everyone's best interest, including our patients and employees. Compliance protects our reputation and our relationships with payers and other providers.

Our Standards

Hospital for Special Care will strive to comply with all applicable laws, regulations and federal health program requirements. We will strive for high ethical standards in our relationships with others, in our workplace environment and in our business practices.

The statements summarized below are drawn from the Standards of Conduct that are located on Symplr, the Hospital's on-line policy portal. These statements reflect our values and ethical principles and should be carried out in day-to-day actions and behavior.

Caring

We dedicate ourselves to:

- Provide quality patient care according to accepted standards of practice.
- Treat all patients and employees with respect, dignity, caring and compassion.
- Protect patient rights and ensure that each patient maintains autonomy and is involved in his or her medical care.
- Make decisions regarding admissions and clinical care based on patient health care needs, not on the financial gains to the Hospital.
- Guard the confidentiality of patient information. Information is shared only on a "need-to-know" basis.
- Respect the privacy of our patients.
- Be sensitive to individual cultural or religious beliefs.
- Respond quickly to complaints or concerns.
- Maintain a drug and alcohol free work environment.
- Conduct clinical research in accordance with applicable law, ethical standards and clinical guidelines.
- Handle controlled substances, medications and supplies according to clinical and regulatory standards.
- Identify and respond to health and safety hazards that affect our patients and workforce.

Integrity

We commit ourselves to:

- Operate in a manner that is honest, fair and responsible.

- Comply with applicable laws and regulations.
- Present only truthful information in our marketing materials and public announcements.
- Provide care and take personnel actions without discriminating on the basis of race, color, religious creed, age, marital status, national origin, ancestry, sex, ability to pay, sexual orientation, gender identity or disability.
- Ensure that we do not tolerate harassment or violent behavior of any kind.
- Ensure responsible and efficient use of the organization's resources.
- Use our systems and equipment, such as email, Internet access, copiers, phones and fax machines, only for business purposes.
- Keep our passwords confidential and protect information from unauthorized access.
- Access health and business records for job-related reasons only.
- Maintain accurate records and documents.
- Ensure that records are not altered, changed or destroyed, except as set forth in the Retention of Records policy.
- Bill correctly for items and services, based on federal and state law and program requirements and accepted coding standards.
- Cooperate with outside officials and agencies that have the authority to make inquiries and inspections.
- Identify and avoid possible conflicts of interest. A conflict of interest may exist when an observer of your actions could question whether you are acting to serve your own interests.
- Refuse to offer or accept gifts that might have an effect on our business decisions or relationships. Our relationships with other providers, referral sources, customers, suppliers, and other third parties will be based on ethical standards that seek the best outcomes and value for our patients and the organization.
- Use ethical means when gathering facts about our competitors and share only necessary facts with our suppliers and competitors.
- Avoid antitrust concerns and anti-competitive behavior (such as price fixing or sharing "trade secrets").
- Keep personal political actions separate from our actions on behalf of Hospital for Special Care.

The Pursuit of Excellence

We will:

- Strive for the highest level of competence and skilled performance.
- Follow the ethical standards that apply to us as health care professionals.
- Not sacrifice ethical and compliant behavior in the pursuit of business objectives.
- Expect that questions and concerns related to compliance with any law or policy will be raised, and investigate and resolve any such questions or concerns in a timely manner.
- Ensure that our workforce has the information and tools necessary to comply with applicable laws, regulations and policies.

What is the Organizational Ethics and Corporate Compliance Program?

Hospital for Special Care's parent organization, Center of Special Care, Inc., established its Organizational Ethics and Corporate Compliance Program to ensure that all the organizations in its corporate family comply with laws and other rules that affect us, including federal health care program requirements. To carry out this purpose, the role of the Organizational Ethics and Corporate Compliance Program is to:

- Identify an individual as Corporate Compliance Officer and designate the members of the Organizational Ethics and Corporate Compliance Steering Committee.
- Develop and maintain written standards and policies on compliance matters.
- Maintain an open process for reporting possible problems without fear of retaliation.
- Oversee education and training on compliance matters.
- Audit and monitor our practices and procedures on an ongoing basis.
- Consistently respond to alleged violations.
- Ensure consistent enforcement of disciplinary standards.

The Corporate Compliance Officer is always available to answer questions you may have about legal or ethical requirements, our operating procedures, or the actions of an individual or entity that may violate our Code of Conduct.

Where Do I Go With Questions or Reports?

When you have a question or concern, you are encouraged to talk with your supervisor. However, at times you may not feel comfortable doing this and may talk with any of the following:

The Corporate Compliance Officer	860-827-1958 ext. 3951
Human Resources	860-827-4780
Any member of the Organizational Ethics and Corporate Compliance Steering Committee.	
President/CEO	860-832-6281

Any of these individuals welcome questions, concerns or issues related to compliance matters. We will look into any report of a compliance violation promptly.

Can I Report Without Giving My Name?

You may call the compliance hotline at 1-888-220-5463 at any time. You may also file an anonymous online report at www.mycompliance.com/report?cid=HFSC. Company access code: HFSC.

Ethico is an outside service that will take your information regarding a compliance concern, and then share that information with the Corporate Compliance program staff. You may choose not to give your name. You may also call back to the Ethico for a response to your concern.

Leaders at all levels of Hospital for Special Care will set the example, creating a culture that promotes the highest standards of ethics and compliance. Our leaders welcome questions regarding this Code of Conduct, the Standards of Conduct and related matters.