



 **NewYork-Presbyterian**

# Code of Conduct

April 2022

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# Letter from the Chief Executive Officer

A special message from Steven J. Corwin, M.D., President and Chief Executive Officer, to the employees, medical staff, and others who work or do business with the NewYork-Presbyterian community.

Our goal is to be the preeminent academic integrated delivery system in the country, providing the highest quality, safest, and most compassionate care to our patients and their families. To achieve our goal, we must be true to our commitment to “We Put Patients First” and operate in a manner that satisfies regulatory requirements and social responsibility. Every employee, medical staff member, and all those doing business at or on behalf of New York-Presbyterian are expected to embrace our Culture and act with integrity, fairness, honesty, and in the best interests of our Institution and those we serve.

This is our Code of Conduct (Code), a “living document” reviewed continuously to reflect current requirements in an ever-changing regulatory environment. It was recently amended by our Board of Trustees to include language reinforcing NYP’s absolute commitment to a safe and respectful environment for all – patients, caregivers, staff members and visitors – anyone who enters our campuses or interacts with our enterprise. The Code articulates principles that guide us as we meet current, and future, challenges.” While each of us should take the time to read and familiarize ourselves with the Code, I want to emphasize the following:

1. Compliance is essential in every aspect of our business; we need to be aware of and adhere to all laws and regulations.
2. When issues or concerns are raised, they will be addressed appropriately by our management team. It is management’s job to foster an environment that facilitates problem identification and resolution. So, do not be afraid to ask.
3. Each of us has an affirmative duty to bring matters of concern to the attention of the appropriate personnel. You will be protected from retaliation or retribution for doing so in good faith.
4. The Code applies to all of us.

Please read this booklet carefully, paying particular attention to those aspects of the Code which apply to your area of responsibility. Use the information to guide your work at NYP. Thank you for your ongoing support, and for your commitment to our patients and their families.

Very truly yours,



**Steven J. Corwin, M.D.**  
President and Chief Executive Officer

# *Our Culture*







## Our Commitment

“We Put Patients First”



## Our Vision

To Be the Top Academic Integrated Delivery System in the Nation in Patient Centered Care, Research and Education.

## Our Culture

### Respect

Every Person Counts, Every Role Counts

### Teamwork

Working Together

### Excellence

Exceptional Quality and Service

### Empathy

Listen, Understand and Respond

### Innovation

Creative Ideas, Cutting Edge Solutions

### Responsibility

Honoring Our Past, Ensuring Our Future



# Our CREDO



## RESPECT at NewYork-Presbyterian

*At NYP, every person and every role counts. We will treat everyone as a valued human being, considering everyone's feelings, needs, ideas and preferences. We will honor everyone's contributions to creating a safe healing environment for our patients, families and colleagues.*

### AS A MEMBER OF THE NYP COMMUNITY:

#### I believe

- Every individual who comes to us for care and who works here deserves my courtesy and respect.
- Every contact with a patient or co-worker is a chance to build a trusting relationship.
- It is my responsibility to honor our commitment to *We Put Patients First*.
- Teamwork and clear communication are necessary for providing the highest quality care.
- NYP is enriched by embracing our diversity and standing against racism and prejudice in all its forms.
- Every team member contributes to NYP's success and to creating an environment where everyone feels like they belong.

#### I will

- Treat others as they want to be treated, with kindness, courtesy, and empathy.
- Show respect in my words, actions, communication, and body language.
- Listen to and respond to patients, families, and colleagues.
- Do my best to assist a patient or colleague asking for help.
- Assume the best of others and give them the benefit of the doubt.
- Be open to the ideas of others and handle differences of opinion constructively.
- Hold myself, my colleagues, and my team accountable for our work.
- Help foster an environment of professionalism, openness, and high ethical standards.
- Uphold NYP's commitment to diversity, inclusion and belonging.

#### I will not

- Speak or act disrespectfully toward anyone.
- Engage in or tolerate abusive or discriminatory language and behavior in any form.
- Speak negatively about patients or colleagues, especially in front of patients and visitors.
- Create an environment in which people are afraid to bring forward concerns or issues of safety.
- Act irresponsibly with NYP resources.

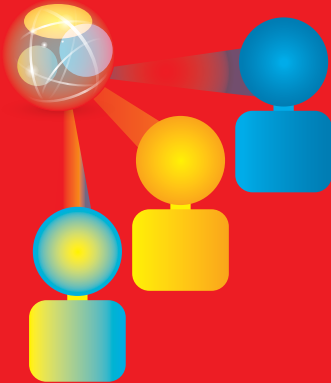


If you have a concern,  
please tell us about it.

Contact the NYP Respect Office via HR Connects. Scan QR code, email [hrc@nyp.org](mailto:hrc@nyp.org), or call 646-697-4727

# Overview and Introduction

## What is NewYork-Presbyterian's (NYP) Code of Conduct?



NYP's Code of Conduct clearly and concisely outlines the types of behaviors expected in the workplace. The Code of Conduct was developed to support NYP's workforce in complying with applicable laws, regulations and NYP policies and assist with making decisions that are in the best interest of the hospital and our patients.

## Why is it important to have a Code of Conduct?



NYP established a Code of Conduct to reflect our culture and foster an environment that optimizes the delivery of the highest quality and compassionate, patient-centered care. We share a common commitment, vision and values, and the Code of Conduct helps us to fulfill each with integrity, fairness and in the best interest of NYP and those we serve.

## Does the Code of Conduct apply to me?



Without exception, this Code applies equally to everyone at all levels of the organization across the NYP system and it is the responsibility of senior leadership, medical/professional staff, contract staff, volunteers, students, researchers and all employees of NYP to act in a manner consistent with the Code of Conduct.



# Responsibility

Compliance with Rules, Regulations and Policies

## Compliance with Rules, Regulations and Policies

### NYP's Commitment to You

- We work every day to achieve the organization's mission, vision and values.
- We apply the Code of Conduct and other organizational standards and policies fairly and consistently.
- If these important expectations are not followed, we respond appropriately, according to the organization's discipline guidelines and, if applicable, the terms of any contracts and labor agreements.



## Your Commitment

- You understand and comply with applicable rules, regulations and laws that govern NYP and its employees.
- You use the Code of Conduct and other resources from the organization to help you make the right decisions.
- You familiarize yourself and comply with the contents of the Employee Handbook as well as with the policies and procedures applicable to your employment and responsibilities at NYP. If you have questions about any of these requirements, you address them with management.
- You know that a violation of your responsibilities, as explained in the Code of Conduct, other organizational standards and policies, and applicable laws, can result in corrective action, up to and including termination. Medical staff members, because they are employed by or appointed by the medical colleges, may have additional obligations.

# Reporting Expectations and Resources

## NYP's Commitment to You

- We establish, maintain and make available multiple mechanisms for reporting compliance concerns, including a Compliance Helpline.
- Reports can be made through the toll-free Compliance Helpline at 1-888-308-4435 or web-based submission at [nyp.ethicspoint.com](http://nyp.ethicspoint.com), which is available 24/7. The Compliance Helpline is operated by an outside organization. Reports can be made anonymously and in both English and Spanish.



- We ensure all reports received through the Helpline are thoroughly investigated and addressed.
- We make every effort to maintain the confidentiality of the information provided to the fullest extent practical or allowed by law.
- We make sure that the information we create, maintain and report is fair, accurate, complete and timely.





## Your Commitment

- You foster a culture of integrity and compliance, and model that behavior.
- You timely report any known or suspected Compliance violations.
- You understand that you cannot be retaliated against for reporting a compliance concern.
- You will not intimidate or retaliate against others for reporting compliance concerns.
- You will report all known or suspected concerns in good faith.
- If there is a question or concern about a situation that you believe may be illegal or unethical, you may first seek guidance from your manager. If you are uncomfortable addressing the issue with your manager or the manager has failed to address the issue in a timely or effective manner, you will inform one or more of the following: Senior Management, Office of Legal Affairs, Human Resources or Compliance. When managers are unsure of how to respond to an inquiry from an employee, you seek assistance through the chain of command, the Human Resources Department, the Office of Legal Affairs or the Office of Corporate Compliance
- Reporting directly to the Office of Corporate Compliance should never be discouraged.

# Excellence

## Training and Education

### Training and Education

#### NYP's Commitment to You

- We maintain a comprehensive, formal program of general compliance and privacy training to ensure that members of the NYP workforce are aware of their legal, moral and ethical responsibilities.
- We will prepare and periodically update the compliance and privacy training content and maintain records of training completion. Other communication and training mechanisms (e.g., specialized training and huddle messages), will be implemented at the discretion of the Office of Corporate Compliance.
- We provide training and education to new workforce members to ensure awareness of the NYP Compliance and Privacy Program expectations.

NYP Learning Center: Home | Person free vector download | What a Way to Live!, Part 1 | Adobe Sign, an Adobe Document Cloud Service |

https://nyp.sabacloud.com/Saba/Web\_spf/NA3P1PRD006/local

Apps | PrinterLogic | Conference Room... | Lynda.com | NYP Service Porta... | Best Medical Stoc...

NewYork-Presbyterian

Home | Me | Groups

Search | BROWSE

Personalize

Google CHROME is the preferred browser for the Learning Center.

West Campus Provider Training Enrollment Is Now Live. Clinical and Administrative Staff Begin Enrollment on June 3rd.

Epic Training Enrollment Assistance Is Available By Phone. Call the EpicTogether Training Hotline Monday - Friday, 9 AM - 5 PM, at 646-697-EPIC (3742)

Welcome to  
EpicTogether

Are You  
EpicCurious?

LGBTQ+ AT NYP

NYP ACHIEVE

Find training programs and career coaching events to build your career at NYP.

## Your Commitment

- You will attend general compliance and privacy training at new hire orientation and complete a general compliance and privacy training annually thereafter online.
- You complete required education and training on time.
- You ask your manager or reach out to the Office of Corporate Compliance for help if you do not understand something that is covered in a training or educational materials.
- You reach out to the Office of Corporate Compliance if you recognize the need for specialized department-specific compliance training.



# Billing, Coding and Reimbursement

## NYP's Commitment to You

- We continually evaluate our coding and billing activities to identify areas for improvement.
- We will make special note of concerns identified by regulators to mitigate the risk of improper billing.
- We will properly train staff and provide them with coding and billing updates in a timely manner.
- We will ensure payers are notified of payment errors and process refunds promptly and accurately.

## Your Commitment

- You will document, code and bill only for services that were actually rendered.
- You will maintain accurate, thorough and complete documentation to support coding and billing for all services.
- You will bill for services according to Federal Payer Guidelines where applicable.
- You will bill in compliance with the Teaching Hospitals Guidelines where applicable.
- You will not routinely waive patients' coinsurances and deductibles.
- If you notice a coding or billing error, you will report it to your manager or the appropriate NYP authority.



# Referrals of Care and Service

## NYP's Commitment to You

- It is important that patients trust that when we suggest treatment and other services, our recommendations are based on their needs and that we are providing the highest quality, safest and most compassionate care to our patients and their families. Therefore, we follow all laws, sound care, and referral practices by making sure patients receive appropriate care and service.

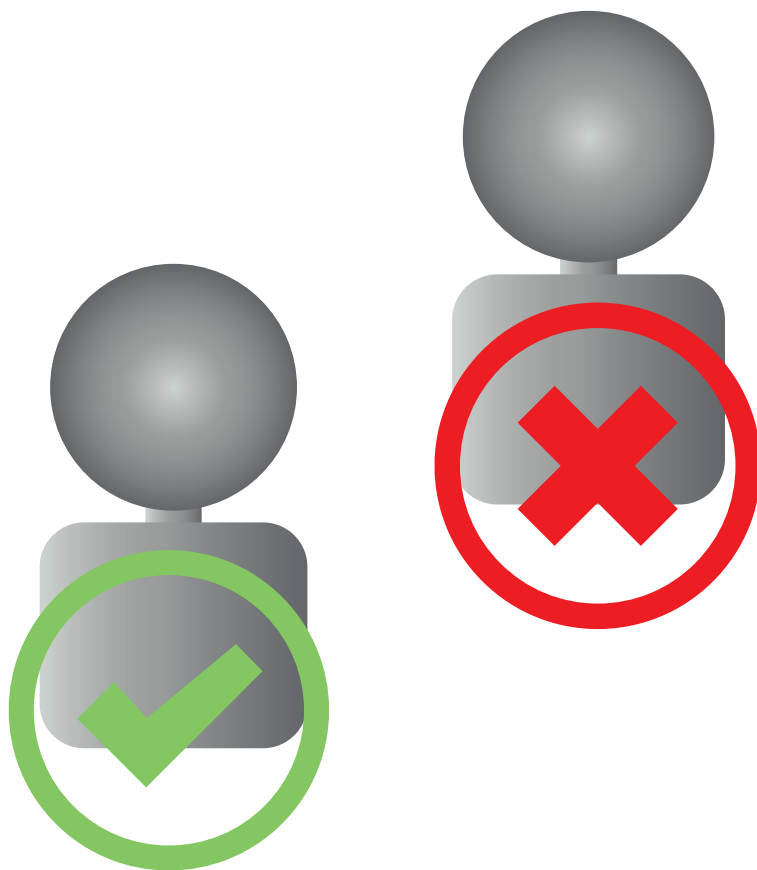
## Your Commitment

- You follow all laws about referring patients to other providers, facilities, suppliers and plans. These laws, some of which are known as the Anti-kickback, Stark (or physician self-referral) and Patient Freedom of Choice laws can be complicated; consult with the Office of Legal Affairs if you are considering an arrangement with an outside provider or supplier that might affect patient or member referral patterns or choices.
- You do not directly or indirectly solicit, accept or offer anything of value in exchange for patient or member referrals.
- You do not give, offer or promise anything of value to any government official, primary contractor, subcontractor or other entity for the purpose of improperly obtaining or receiving favorable treatment for yourself or NYP.
- You do not accept, directly or indirectly, anything of value from any NYP vendor (or entity seeking to do business with NYP) in exchange for giving favorable treatment to the vendor.
- If you are a physician, you do not refer patients to other providers or facilities with which you or your family have a financial relationship.
- You do not offer special benefits or incentives to patients unless those arrangements meet very specific criteria approved in advance by the Office of Legal Affairs.

# Quality of Care and Services

## NYP's Commitment to You

- We screen all prospective employees, vendors and medical staff to assure that they have not been sanctioned by any regulatory agency and are eligible to provide services or perform their designated responsibilities.
- We provide high quality care and skilled, compassionate, reliable service to our patients and to our community in a safe and healing environment.
- We expect all employees and medical staff to conform to the standards of their professions and exercise appropriate judgment in the performance of their duties.
- We know that excellent patient experiences result when people are engaged and proud of their work.







## Your Commitment

- You act in accordance with the provisions of the Patient Bill of Rights, as well as adhere to the following principles as applicable:
  - You honor the dignity and privacy of each of our patients and will treat them at all times with consideration, courtesy and respect.
  - You provide appropriate and timely care to all patients without regard to race, color, religion, age, gender, sex, national origin, sexual orientation, gender identity or expression, disability, military status or source of payment.
  - When a patient presents with an emergency medical condition, you provide that patient with a screening examination and stabilization of any emergency condition in accordance with applicable laws, rules and regulations, regardless of the patient's ability to pay. Patients will only be transferred after they are medically stabilized and an appropriate transfer has been arranged.
  - You ensure a qualified practitioner properly evaluates every patient before initiating a treatment plan.
  - You provide patient care that conforms to acceptable clinical and safety standards.
  - You maintain complete and thorough records of patient information to fulfill the requirements set forth in our policies, accreditation standards, and applicable laws and regulations.
- You support and promote the continuous quality and performance improvement program (s) throughout NYP.
- You continuously strive toward a culture of patient safety.
- You provide service to our patients and their families in a manner that embodies our philosophy of “We Put Patients First” and aligns with Commitment to Care service expectations for all NYP employees or medical staff.

# Empathy

## Harassment and Workplace Violence

### Harassment and Workplace Violence

#### **NYP's Commitment to You**

- We do not tolerate any form of harassment, including verbal, physical, visual or sexual harassment, or the intent to create an offensive, hostile or intimidating environment.
- We strive to create and maintain an environment free from violence, both real and implied.



## Your Commitment

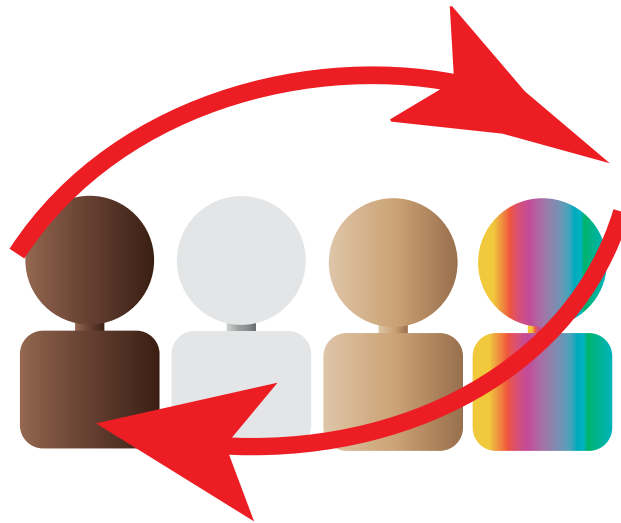
- If you feel you have been the subject of harassment (verbal, physical, visual or sexual), or have witnessed or been told of an incident, report it immediately.
- If you feel you have been the subject of violence, believe you are at risk of experiencing violent behavior, or become aware of an incident of violence, report it immediately.
- You will not engage in any form of harassment, including verbal, physical, visual or sexual, or create an environment which is offensive, hostile or intimidating.



# Diversity, Equal Opportunity and Inclusion

## NYP's Commitment to You

- We recognize the freedom, rights and dignity to which colleagues and applicants for employment are entitled.
- We do not make employment decisions based on race, creed, color, age, sex, marital status, national origin, religion, sexual orientation, sexual and other reproductive health decisions, gender identity or expression, physical or mental disability, veteran status, or status with regard to public assistance or genetic information.



- We recognize that our greatest strength lies in the talent of our staff who create the organization's success and determine its reputation.
- We are committed to creating safe, respectful environments to support our employees, medical staff, vendors, independent contractors, volunteers and practitioners who encounter abusive and/or discriminatory behavior.
- We will not permit any act of retaliation or reprisal against an employee or medical staff member who in good faith reports a violation of law, regulation, standard, policy or the Code of Conduct.
- We encourage teamwork and create structures, processes and programs that enable a positive culture to flourish. Disruptive behavior that intimidates others and affects morale or staff turnover will not be tolerated and will be addressed appropriately.





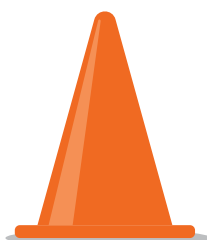
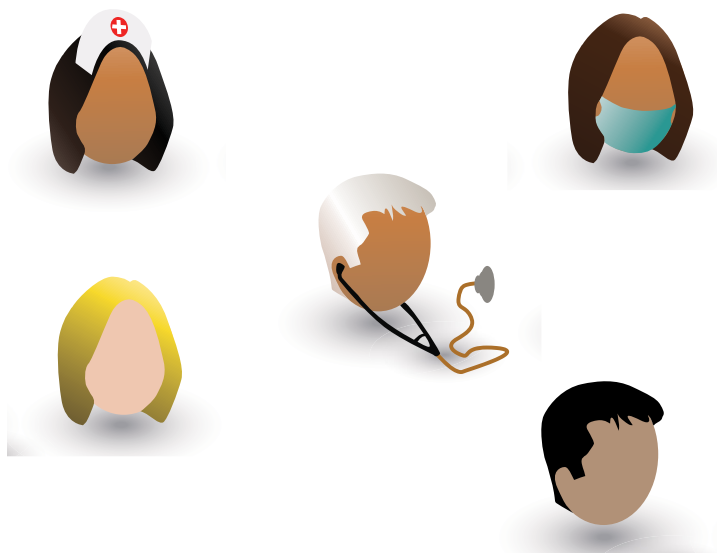
## Your Commitment

- You do not discriminate based on race, creed, color, age, sex, marital status, national origin, religion, sexual orientation, sexual and other reproductive health decisions, gender identity or expression, physical or mental disability, veteran status, or status with regard to public assistance or genetic information.
- You support your colleagues, medical staff, vendors, independent contractors, volunteers and practitioners who encounter abusive and/or discriminatory behavior.
- You treat all people with respect, dignity and courtesy.

# Environmental and Safety Considerations

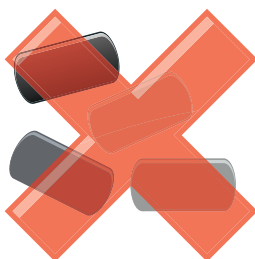
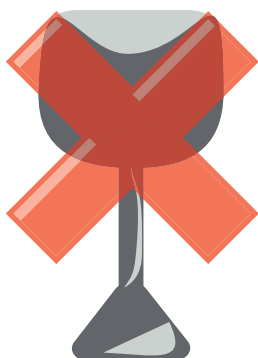
## NYP's Commitment to You

- We maintain a safe, secure and healthy environment for everyone onsite, including employees, volunteers, patients and visitors.



- We make workplace safety a priority.

- We support an alcohol, drug and smoke-free workplace and abide by policies prohibiting illegal possession, distribution, use or being under the influence of illegal drugs, alcohol or other substances.







## Your Commitment

- You work to provide a safe, secure, healthy and productive work environment for all colleagues.
- You make workplace safety one of your priorities.
- You follow all workplace health and safety laws and policies at your location, including Safety and Infection Control policies and procedures.
- You report unsafe work acts or conditions, accidents and environmental concerns to your manager, Safety Officer, or Corporate Compliance right away.
- You participate in safety meetings and trainings as required.
- You work in a responsible and professional manner, including exercising good judgment with regard to the environmental aspects of the use of NYP buildings, property, laboratory processes and medical products.
- NYP is a smoke-free environment, and you comply with related, applicable policies.
- You comply with all laws and regulations governing the handling, storage, use and disposal of hazardous materials, other pollutants and infectious wastes.
- You comply with permit requirements that allow for the safe discharge of pollutants into the air, sewage systems, water or land. You wear an appropriate identification card at all times while performing your duties on behalf of NYP. At any time, you may be asked to identify yourself by name and department.



# Teamwork

## Business Ethics

## Business Ethics

### NYP's Commitment to You

- We will follow all applicable laws and regulations, conduct our business ethically and honestly, and act in a manner that enhances NYP's standing in the community and is sensitive to those whom we serve.
- We work to prevent, detect and correct fraud, waste and abuse related to health care benefits paid by the government, commercial health plans and employers.
- We routinely assess the risk that illegal conduct might occur, whether in our own facilities, by subcontractors, or network providers.
- When fraud, waste or abuse is identified, we address the issue through appropriate corrective action, which may include a report of our findings to the government and a refund or repayment of any undue payment.
- We cooperate fully with regulators and law enforcement.
- We notify workforce members about federal and state laws relating to false claims, false statements and whistleblower protections in accordance with the Deficit Reduction Act of 2005.



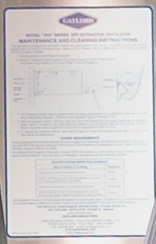
## **NYP's Commitment to You** (continued)

- We will procure, maintain, dispense and transport drugs and controlled substances used in the treatment of patients according to applicable laws and regulations.
- We will 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.
- We will follow the laws regarding intellectual properties, including patents, trademarks, marketing, copyrights and software.

## Your Commitment

- You demonstrate honesty, integrity and fairness in the performance of your duties.
- You make every effort to prevent and detect fraudulent, wasteful or abusive activity that may affect our resources or our interactions with local, state and federal governments.
- You report any practice or condition that may violate any law, rule, regulation, safety standard, policy or the Code of Conduct to appropriate leadership, the Office of Legal Affairs or the Office of Corporate Compliance.
- You adhere to all applicable laws, regulations, and professional standards regarding financial reporting and disclosures, and submit accurate claims and reports to the federal, state and local governments.
- You will maintain the accuracy of NYP's books and records, and will not create or be a part of the creation of any records intended to mislead or to hide anything that is improper.
- You must: i) avoid agreements or understandings with competitors on how we will compete, or not compete, to provide healthcare services; recruit, employ or compensate practitioners and staff; or bid for or select vendors; and ii) not discuss or share competitively-sensitive information with competitors. Competitively-sensitive information includes pricing, reimbursement rates, discounts, wages, compensation, benefits, business plans, terms, projections, strategies, investments, and any non-public information. You will raise or report any antitrust questions or concerns to Corporate Compliance.
- You do not make verbal or written false or misleading statements to a government agency or other payer.
- You do not pursue business opportunities that require unethical or illegal activity.
- You provide truthful reports and information as required by any federal, state or local government agency on time, accurately and according to applicable laws and regulations.
- You will comply with federal regulations regarding government contracts and programs in which we participate.
- You will not engage in lobbying activities on behalf of NYP that are inconsistent with the laws, rules or regulations applicable to tax-exempt entities.
- If applicable, you will conduct fundraising in accordance with all applicable laws and regulations and policies and procedures.
- Travel and entertainment expenses should be consistent with our job responsibilities,
- NYP's needs and in accordance with policy.







# Conflict of Interest

## NYP's Commitment to You

- We offer care and service to our patients and research participants that is objective and based on the best available scientific evidence.
- We use processes to make decisions about care, service, prescribing and purchasing that ensure those decisions are free from the influence (or perception) of personal gain.
- We are not influenced by gifts, entertainment opportunities, meals or other offers from the people and organizations that we do business with.
- We respond appropriately in situations where we are offered gifts or other tokens of appreciation from vendors, patients, their families, customers, competitors and others.
- We will not employ members of the same family in an organizational unit where one supervisor supervises them or where one of them supervises others in the family unit (spouse, children, parents, in-laws or siblings). NYP reserves the right to avoid the possibility of nepotism by unilateral transfer of the individuals concerned.



# Personal Interests

## Your Commitment

- You make decisions about your work that are in the best interests of our organization and all of the people we serve. This commitment includes those acts formalized in written contracts, as well as everyday business relationships with vendors, customers, government officials and government employees.
- You avoid personal relationships and arrangements that could interfere, or appear to interfere, with your ability to do your work objectively and with independent judgment.
- You recuse yourself from any purchasing, ordering or prescribing decision if you have a personal interest in the outcome of the decision.
- You promptly fill out all conflict of interest forms completely and honestly.
- You disclose all outside interests that involve health care, our competitors or our suppliers to your leader and as part of any organizational certification or disclosure process that applies to you. Medical staff members must complete, at a minimum, a conflict of interest form on every reappointment and will update the information as appropriate.
- You promptly disclose any material changes to your conflict of interest responses.

### Examples of potential conflicts of interest that must be disclosed include:

- A significant investment in a company that may do business, seek to do business or compete with NYP.
- Conducting business on behalf of NYP with a relative or company in which you or a relative has a substantial interest.
- Employment with or providing services to a company that may do business, seek to do business or compete with NYP.
- Accepting gifts, entertainment, travel or education expenses from a company that may do business, seek to do business or compete with NYP.
- Participating on outside boards of directors/trustees of competitors or those doing business with or on behalf of NYP.
- Having a directorial, supervisory or subordinate relationship with a relative, or hiring a relative.

\*\* Keep in mind it is not possible to define all circumstances in which a conflict of interest does or does not occur. Acting within the letter and spirit of this section in conjunction with Conflict of Interest policies is the responsibility of each individual.

## Employee Relatives

### Your Commitment

- You treat your family members' personal and business interests as your own, and disclose them to your leader and as part of any organizational certification or disclosure process that applies to you.
- You will disclose family relationships appropriately to management and/or the Office of Corporate Compliance in order to minimize potential conflicts.

## Gifts, Gratuities and Entertainment

### Your Commitment

- You do not solicit or accept gifts, entertainment opportunities, meals or favors from a vendor in appreciation for good service or as a thanks for business.
- You refuse offers from vendors to provide parties or donate food for internal functions.
- You do not solicit or accept cash or cash equivalents (such as gift cards) from vendors, suppliers, other contractors or others, including patients, unless approved by the Development Office and/or the Office of Corporate Compliance.
- You do not attempt to influence others' care or business decisions with gifts or other offers.
- You do not accept cash gifts or cash equivalents (including gift certificates, gift checks, and gift cards) in any amount, from patients, family members, or their visitors.
- You may accept a non-cash gift (retail value not exceeding \$100) in a calendar year, given on holidays when gifts are customary.
- You may accept tokens of appreciation, of nominal value (e.g., perishables, flowers, baked goods. etc.), from patients as long as the token is unsolicited and shared with the recipient's team, unit, or department.
- You are not prohibited from exchanging gifts of a personal nature with other employees, provided hospital funds are not utilized. Gifts related to a person's employment at the Hospital (e.g. for Secretary's Day, Nurses Week, etc.) are permitted, provided they are customary for the occasion.
- You are aware that gifts between managers and staff may create an appearance of favoritism.
- You disclose all gifts or gifts offered to a manager.



- If you have a question as to the value or the appropriateness of a gift, you refer to NYP's conflict of interest policies regarding Acceptance of Gifts and Honorarium and Speaking Engagements and then seek approval from your manager or the Office of Corporate Compliance.

## Vendors

### Your Commitment

- You will inform vendors of our policies regarding ethical business conduct and compliance with law, as well as our expectation that vendors act in accordance with such law and policies. You will inform vendors who are our business associates of their obligation requirements under HIPAA to safeguard our patients' information and immediately report any privacy and/or security breaches.
- You will avoid agreements or other actions that may unfairly restrain trade or reduce competition.
- You will avoid placing business with any vendor of NYP in which you or members of your immediate family have a direct or indirect interest, employment or other financial relationship, unless the relationship is disclosed and approved according to policy.
- You seek approval from your manager before attending vendor-sponsored events. If your manager has questions about whether a specific invitation may be accepted under this item, s/he should discuss it with the Compliance Officer.





# Respect

## Privacy, Security and Confidentiality

### NYP's Commitment to You

- Protecting the privacy and confidentiality of all patients and workforce members is a top priority.
- We do not tolerate deliberate breaches of privacy or confidentiality.
- We are committed to maintaining the confidentiality of employees, patients and other sensitive or proprietary information in accordance with legal and ethical standards.
- We educate new workforce members on the importance of protecting and keeping confidential employee information, sensitive and protected patient information and other privileged information.



## Your Commitment

- You are committed to maintaining the confidentiality of all employees, patients and other privileged information in accordance with legal and ethical standards.
- You adhere to all established confidentiality, privacy and security policies, procedures and laws including the Health Insurance Portability and Accountability Act (HIPAA).
- You respect the privacy of our patients, fellow employees, and medical staff.
- You actively protect and safeguard patients' Protected Health Information (PHI) and patients' personal information in all forms, including paper, electronic, verbal, and telephonic.
- You only access a patient's chart or medical data when you are involved in that patient's care, or when you need access to the chart for a legitimate work-related reason such as billing, administrative, teaching or research requirements.
- When appropriately sharing patient information, you share only the minimum necessary to meet the request.
- When appropriately sharing patient information outside of the organization, you ensure that the information is shared in a secure manner.
- You secure patients' information by using encrypted and password-protected electronic devices only (i.e., flash drives, laptops, etc.) and by following all applicable NYP policies.
- You do not discuss patient information in public areas, including elevators, hallways and dining areas.
- You seek permission from the patient before discussing patient information in front of patient family members and/or friends.
- You use appropriate channels to obtain you or your family members' patient records.

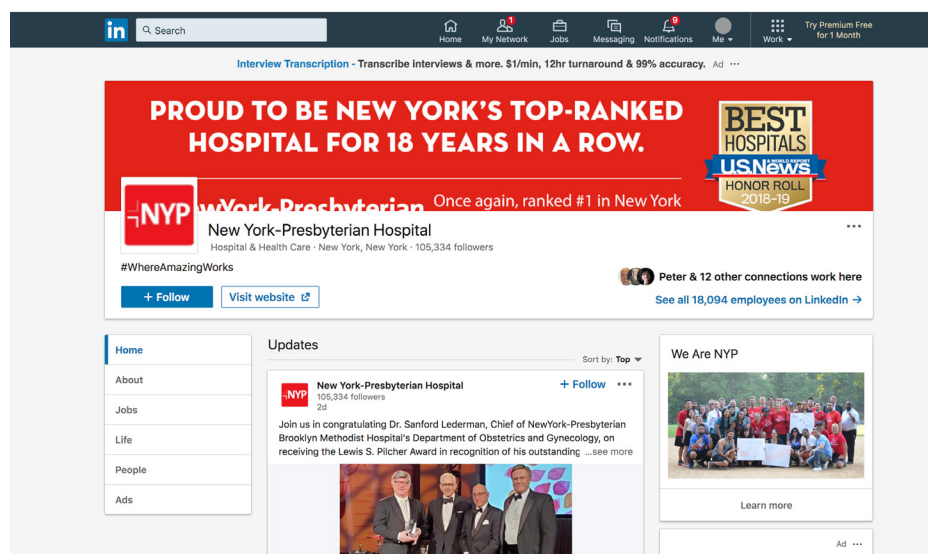
# Innovation

## Communication, Marketing and Social Media

### NYP's Commitment to You

- We communicate openly, honestly and in good faith with each other, those we serve and the community.
- We encourage colleagues to speak directly with their leaders when they have concerns about their work, their employment or any other issue related to the organization.
- In the age of social and interactive media and emerging new ways to communicate, we remain committed to the basic expectation of communicating with integrity and discretion.





## Your Commitment

- When you communicate about the organization or your work in a public setting or forum, avoid using statements, images or recordings that could be viewed as unlawful, profane, discriminatory, threatening or hateful to another person or to an organization, including our organization, the people we serve, vendors, competitors or your colleagues.
- You are clear in your public communications about whether you are speaking as an individual or on behalf of the organization and only speak on behalf of the organization if you are authorized to do so as part of your job responsibilities.
- Whether you are discussing your work in a public setting, such as at a conference, or in a personal setting, such as at home, you always follow organizational policies on privacy, business confidentiality, social media, e-mail and internet usage and conflicts of interest.
- You never talk about or post PHI or any patient-related information, including images of patients, on social media.
- You only take pictures on units or in patient care areas consistent with NYP policies. You market and advertise accurately and in compliance with laws and regulations.

# Information Security and the Protection of NYP Assets and Proprietary Information

## NYP's Commitment to You

- Our success depends in part on the unique nature of our services, products, brand, systems and other business information. It is essential that we protect the confidentiality of our business information and respect the intellectual property rights of the organization and others.
- We will treat all personnel files and records containing personal information as confidential.





## Your Commitment

- You handle all confidential business information as carefully as you would handle patient and member information and your own personal information.
- You only access patient information with a legitimate business reason using the minimum amount necessary.
- You do not share insider information, which is not otherwise publicly available, including pricing and financial information, for any direct or indirect personal gain or other improper use.
- You protect NYP assets and the assets of others entrusted to NYP against loss, theft or misuse. This includes physical and intellectual property.
- You use NYP property appropriately and take measures to prevent any loss of equipment, supplies, materials or services.
- You do not use NYP assets or property for personal use without appropriate permissions. Managers or clinical service chiefs must approve any personal use of NYP equipment, supplies, materials or services.
- You only use hospital issued and/ or approved systems and platforms for hospital business.
- You will not copy NYP computer software unless it is specifically allowed in the license agreement.
- Employees will report time and attendance accurately and will work productively while on duty.
- You only share business information outside the organization when approved.
- You encrypt all confidential information when storing or transmitting outside of NYP.
- You keep the organization's business information confidential after your association with NYP ends.
- If you are unsure if you should share the organization's intellectual property or other organizational information, ask your manager.
- You protect your User IDs, identification information and passwords.
- You lock your computer when stepping away and log off your computer at the end of each shift.
- You do not open a link or email attachment from an unknown or unexpected source.
- You do not insert a non-NYP flashdrive or other peripheral device into an NYP computer.



# Research Compliance

## NYP's Commitment to You

- We learn through research and innovation while honoring ethical and legal standards. Scientific truthfulness and integrity ensure that research results are useful and reliable.



- We consider protecting the rights of research participants of the utmost importance.





## Your Commitment

- You ensure research projects are reviewed and approved through the research review process (Institutional Review Board) before any research begins.
- You protect the rights of research participants.
- All patients asked to participate in a research project will be advised of the risks and benefits, as well as alternative services or treatments available. In addition, a patient's refusal to participate will not in any way affect his/her access to care or services provided by NYP.
- You propose, conduct, and report research with integrity and honesty.
- You are educated on, follow, and demonstrate accountability for meeting and ensuring compliance with the requirements of sponsor's regulatory bodies, and other applicable entities.
- You faithfully describe and transmit research data and findings.
- You ensure originality of work, provide credit for the ideas of others upon which their work is built, and are responsible for the accuracy and fairness of information published.

# Compliance Resources

**Compliance Helpline:** 1-888-308-4435

**Office of Corporate Compliance Main Number:** 212-746-1644

**Compliance Infonet Page:**

<https://infonet.nyp.org/Compliance/Pages/CompliancePrivacyAudit.aspx>

**Physician Billing Compliance:** [pbcc@nyp.org](mailto:pbcc@nyp.org)

**Conflicts of Interest:** [coi@nyp.org](mailto:coi@nyp.org)

## Compliance Policies

[Antifraud Program: Incident Identification, Reporting & Investigation - \(F140\)](#)

[Billing and Claims Reimbursement - \(C142\)](#)

[Code of Conduct - \(C143\)](#)

[Compliance Helpline Operations - \(C146\)](#)

[Conflict of Interest – Acceptance of Gifts - \(C144\)](#)

[Conflict of Interest Policy Statement](#)

[Conflict of Interest Questionnaire](#)

[Conflicts of Interest - Speaking Engagements and Honoraria - \(C154\)](#)

[Corporate Compliance Plan - \(L124\)](#)

[Disruptive Behavior / Behaviors That Undermine a Culture of Quality, Safety and Compassionate Care - \(C155\)](#)

[Federal Deficit Reduction Act of 2005 Fraud and Abuse Provisions - \(D160\)](#)

[Non-Retaliation - \(C148\)](#)

[Possible Identity Theft: “Red Flags” Rule - \(R120\)](#)

[Sanction Screening - \(C149\)](#)



# Privacy and Information Security Policies

[Privacy and Confidentiality/Notice of Privacy Practice \(P205\)](#)

[HIPAA Minimum Necessary Standards \(L125\)](#)

[HIPAA Breach Notification - \(L135\)](#)

[Corrective Action to Deter Policy \(C140\)](#)

[Anti-Harassment Policy \(Human Resource Policy and Procedure manual 412\)](#)

[Accounting of Disclosures of Protected Health Information](#)

[Corporate Identification and Marketing Activities](#)

[Corrective Action to Deter and Sanction Breaches of Protected Health Information](#)

[Electronic Mail](#)

[Fundraising](#)

[HIPAA Business Associates](#)

[Patient Access to Medical Records](#)

[Privacy and Confidentiality/Notice of Privacy Practice](#)

[Telefax \(Fax\) Transmissions of Protected Health Information](#)

[Acceptable Use of Electronic Devices and Information - \(I205\)](#)

[Acceptable Use of Personally Owned Mobile Devices - \(I203\)](#)

[General Information Security Policy - \(I220\)](#)

[Information Access Management and Control - \(I215\)](#)

[Information Security Audit and Evaluation - \(I225\)](#)

[Information Security Management Process - \(I210\)](#)

[Information Security Variances - \(I227\)](#)

[Information Security Disaster Contingency and Recovery Plan - \(I250\)](#)

[Information Security: Device and Media Controls - \(I240\)](#)

[Information Technology Acquisition and Use - \(I200\)](#)

[Website Accessibility Policy - \(W150\)](#)

[Workforce Security Clearance, Termination and Authorization - \(I235\)](#)

[Workstation Use and Security - \(I230\)](#)

## Notes

This image shows a full page of blank handwriting practice paper. It features approximately 28 evenly spaced horizontal red lines across the entire width of the page. The background is white, and there are no margins, text, or other markings present.

## This image shows a full page of blank white paper with horizontal red lines. The lines are evenly spaced and run across the width of the page, typical of notebook paper or a document template. There are no margins, text, or other markings present.



