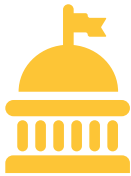


REGULATIONS



GOVERNANCE



STANDARDS

LIFESPAN CODE OF CONDUCT



RULES



REQUIREMENTS

Lifespan
Corporate
Compliance



See Something, Report Something



Dear Colleague,

*Every Lifespan employee, manager and member of the professional staff (collectively referred to as a “team member”) plays a vital role in realizing Lifespan’s mission: **Delivering health with care.** Essential to achieving this mission is Lifespan’s continuous commitment to conduct its business activities in an ethical manner. As such, knowledge of and continued adherence to the Lifespan Corporate Compliance Program is of the utmost importance.*

The **Lifespan Corporate Compliance Program** is a system-wide initiative consisting of a code of conduct, general compliance policies, internal monitoring, employee training and an employee response line. Designed to minimize Lifespan's risk of violating federal and state regulations, the Corporate Compliance Program addresses issues, from billing and claims, to patient confidentiality, to employees' rights. These policies and standards are not a new philosophy of complying with the law, but rather a daily reminder of Lifespan's commitment to being a responsible corporate citizen.

It is your responsibility to comply with the program, to use sound and ethical judgment and to report any suspected violation of law or ethical principle. Suspected violations can be confidentially reported without fear of retaliation by:

- Talking with the manager of your department
- Contacting an executive corporate compliance committee member
- Calling the confidential employee response line at **1-888-678-5111**
- Calling the corporate compliance officer at **1-401-444-4728**
- Completing a confidential employee response form via Lifespan's intranet at <https://intranet.lifespan.org>. "Report a Compliance Concern" is listed as a link at the bottom of the page.

This brochure was developed to help you understand the code of conduct, policy CCPM-1 "Code of Conduct," and the general compliance policies that support the code and the Corporate Compliance Program. If you would like additional information, please visit the Corporate Compliance Program website at <https://intranet.lifespan.org/compliance>.

Your ongoing commitment and support of the Corporate Compliance Program will enable Lifespan to continue to be a health care leader.

Kind regards,



John Fernandez

President and Chief Executive Officer, Lifespan

About Lifespan's Corporate Compliance Program

The Corporate Compliance Program began in the late 1990s in response to the changing health care environment. The Corporate Compliance Program directly aligns with Lifespan's shared values (Compassion, Accountability, Respect, Excellence). It establishes compliance standards and procedures for detecting, preventing and reporting violations of laws and professional regulations.

The mission of the Lifespan Corporate Compliance Program is guided by the Lifespan mission of *Delivering health with care*:

Mission: The Corporate Compliance Program's mission is to create a culture of system-wide compliance with all applicable laws, regulations and Lifespan policies, as well as an appreciation for privacy awareness. The compliance function is a resource to all Lifespan team members, using a collaborative approach to navigate compliance concerns.

To accomplish this mission, the program sets forth in policy reasonable methods for the Lifespan community to follow to achieve continued compliance, and it aims to resolve detected violations in a fair, ethical and consistent manner. For example, it requires all team members to report suspected violations or improper business practices to Lifespan leadership or the Lifespan Corporate Compliance office.

Vision: The Office of Corporate Compliance and Internal Audit is an accountable and supportive team that is innovative, approachable and a confidential resource to connect team members to achieve patient-centric solutions.



Components of Lifespan's Corporate Compliance Program

Lifespan's Corporate Compliance Program includes a code of conduct and numerous supporting policies to ensure compliance with all government rules and regulations.

The code of conduct defines the standards of conduct that all team members are expected to follow. It requires that they:

- Commit to Lifespan **CARE** values
 - ~ **Compassion:** Delivering care and comfort with empathy and kindness.
 - Value diversity
 - ~ **Accountability:** Taking ownership of actions and their consequences.
 - Demonstrate responsibility
 - Use resources effectively
 - ~ **Respect:** Placing the highest value on every individual's well-being regardless of personal and professional differences.
 - Demonstrate honesty, civility, patience, humility and integrity
 - ~ **Excellence:** Always providing safe, high quality, innovative care and service.
 - Demonstrate focus on organizational mission, vision and goal
- Comply with all applicable federal and state laws and regulations and professional standards governing Lifespan's operations and delivery of health care services, regardless of whether such laws, regulations, or standards are specifically mentioned in Lifespan's corporate compliance policies or other Lifespan policy.
- Maintain knowledge of such laws, regulations and professional standards relating to their specific responsibilities by attending educational and training programs offered by either Lifespan or other parties.
- Conduct themselves in accordance with the code of conduct and supporting corporate compliance policies. Failure to do so is not authorized by Lifespan, is inconsistent with Lifespan standards for team members, and may result in progressive disciplinary actions up to loss of employment or curtailment of privileges.
- Periodically review Lifespan's Corporate Compliance policies, located on the Lifespan Intranet at <https://intranet.lifespan.org/compliance>, to become familiar with those policies. Additionally, team members who are Lifespan

employees, as part of the annual performance evaluation process, must acknowledge their understanding of and adherence to the Lifespan Corporate Compliance Program; and active medical staff, during the credentialing process, must attest to their knowledge of and adherence to the Corporate Compliance Program and its policies.

- Report any apparent or threatened violations of any Lifespan policy or any applicable law, regulation, or standard of conduct to their supervisor, senior management or the corporate compliance office. Lifespan will not take adverse action against any person or party who reports in good faith any violation, or apparent or threatened violation. Disciplinary action may be taken against a team member if it is discovered that the team member knew or clearly should have known that a potential violation existed, but failed to report it.
- Know that violation of one or more of the various laws cited in the corporate compliance policies may result in personal, criminal and civil sanctions and penalties. These laws include the False Claims Act, Civil Monetary Penalties Law, the Stark Law, the Anti-Kickback Statute, and the Rhode Island False Claims Act.
- Exercise good faith cooperation in making the Corporate Compliance Program effective.

Summary of Lifespan's Compliance Policies

The following is a brief overview of the various compliance policies, grouped into categories. For more information on a specific policy, go to PolicyStat on the Lifespan Intranet or review the Corporate Compliance Program website at <https://intranet.lifespan.org>. Scroll down to Corporate Compliance (located at the bottom of the page).

Legal Compliance

Lifespan is committed to conducting its actions in conformance with all applicable laws and regulations. Our legal compliance policies cover topics including but not limited to anti-kickback laws, antitrust laws, patient referrals, patient transfers, physician recruitment, non-hiring of sanctioned individuals, and certification of need and licensure.



For example, our patient referral policy generally prohibits a physician from

referring a patient to an entity in which the physician has a financial interest. In addition, our antitrust policy focuses on a commitment to preserving the free enterprise system by not unreasonably restraining competition.

Billing and Claims

Our compliance policy states that Lifespan will adhere to all federal and state billing, coding, and claims regulations. The documenting of services, billing, coding, processing of claims, and obtaining reimbursement from Medicare and Medicaid programs is highly regulated and complex. As such, utmost attention to and diligence in these matters are required.

Many Lifespan team members are responsible for assigning and entering charges, procedure codes, and diagnostic codes; such team members are expected to comply with applicable billing rules to ensure accurate claims are prepared and submitted. False billing is a serious offense and is prohibited.

Examples of false claims include intentionally and knowingly:

- claiming reimbursement for services not rendered or not medically necessary;
- filing duplicate claims; and
- characterizing the service differently than the service actually rendered

Additional billing policies relate to professional courtesy, waiver of co-payments, and prohibition against contingency fee coding contracts.

Conflicts of Interest

Lifespan is committed to achieving its mission by conducting its affairs in accordance with the highest professional and ethical standards. The conflict of interest policy dictates Lifespan's requirements for implementing a system of disclosure and resolution of conflicts of interest.



Q - I received a gift card from my patient as a "thank you" for providing excellent patient care. I don't want to hurt their feelings, can I accept it?



A - Lifespan's policy CCPM 30 "Gift Acceptance" prohibits acceptance of gifts, whether in cash or gift card from patients. Please thank the patient sincerely and refer the patient to the Development Office of your hospital Affiliate for them to make a donation in your name.

Other similar policies in this category include interaction with vendors from the pharmaceutical, medical device and medical supply industries; gifts and entertainment; excess benefits; and private inurement/private benefits. For example, the policy regarding interaction with vendors prohibits our team members, including our employed physicians, from participating in speaker bureau activities.

Confidential Information

Lifespan takes very seriously its responsibility to maintain confidential information. The confidentiality policies relate to patient information, contact with the media and law enforcement, documentation retention, software copyright compliance, the issuance of tax-exempt bonds, and insider information.

For example, the confidentiality of patient information policy requires that all team members comply with our patients' rights to privacy and confidentiality of medical records, and it includes prohibitions on accessing the medical records of family members, friends and colleagues outside of work-related duties. This policy is supported by additional HIPAA privacy policies, which can also be accessed via the Corporate Compliance Program website. In addition, our computer software copyright policy dictates that personal computer software may not be installed, copied or used on any computer owned by Lifespan or its affiliates except as permitted by the software licensing agreement.



***Q-** I want to take a selfie with my favorite patient in their hospital bed and they said it was ok with them. My co-workers are in the photo also and they agree.*

***A -** Lifespan's policy CCPM 74 "Unauthorized Photography and Video Recording of Patients, Professional Staff and Workforce Members by Patients and Visitors" states that photography of a patient is not permitted if it is conducted during patient care or treatment unless there is a signed written authorization by the patient on file in the Marketing office for the specific photo.*





Q- *What if my favorite patient takes a picture of another patient?*

A - *If you see a patient taking a picture or a video of another patient, please alert a member of your clinical leadership and Risk Management as soon as possible. They will contact Corporate Compliance to assist in the next steps. Patients should not take pictures of other patients.*



Q- *I am so worried about my family member that I want to look at the documentation in their medical record that I can find in LifeChart (EPIC) or eClinicalWorks, which is the electronic patient record. Is that ok?*

A - *No. LifeChart and/or eClinicalWorks (eCW) contain confidential patient information. Those systems allow you to access your patient's information, for Lifespan business-related purposes only. Accessing the LifeChart or eCW for you, your family members, or your friends is prohibited, and will result in discipline or termination of your employment.*

However, you can access your personal medical records and the records of your family members for whom you serve as the proxy through MyLifespan and the eCW patient portal. MyLifespan and the eCW patient portal are the only permitted ways to access personal medical records. To secure access please reach out to the Health Information Services department at the hospital or medical group.

Social Media

Lifespan team members who publish or post content on user-generated media or the Internet (including, without limitation, social media sites, blogs, chatrooms and message boards) should exercise good judgment, respect for patient privacy, respect for self and others, and discretion, and should ensure compliance with Lifespan's policy on use of social media.

Positive Work Environment

Providing a positive work environment for all team members is vital to Lifespan's corporate values. The compliance policies include but are not limited to policies on sanctioned individuals, affirmative action, equal employment opportunity, sexual harassment, substance abuse, and occupational safety and health.

For example, the sexual harassment policy states that Lifespan will not tolerate sexual harassment of team members and that swift disciplinary action will occur to eliminate inappropriate conduct. The substance abuse policy dictates that all Lifespan team members will perform their duties at an acceptable performance level—without being impaired by drugs or alcohol.

Political Activities

Lifespan recognizes our team members participate in civic and political activities; however, when doing so they must ensure their actions comply with Lifespan's policy on lobbying. Moreover, Lifespan's direct political activities are limited by both state and federal laws, which mandate that corporations cannot make contributions to elected officials and candidates for political office. In addition, federal statutes govern the reporting of Lifespan's purchases for events that honor members of Congress. Finally, Lifespan has created policies governing contracts with major state and municipal decision makers and compliance with lobbying laws and regulations.

Protecting the Environment

Health care settings produce a variety of environmental wastes that are subject to regulatory and accreditation standards. Lifespan and its affiliates practice safe and responsible techniques for handling and disposing of these wastes in compliance with applicable regulations.



Q- *What if I find paper on the ground or prescription bottles that have patient protected healthcare information or patient address information?*

A - *Pick up the paper or prescription bottle and contact the Office of Corporate Compliance. A team member will work with you on the next steps.*

Research Activities

All research performed at Lifespan must comply with federal and state laws regulating research activities. For example, Lifespan's scientific integrity policy establishes procedures for resolving and reporting possible misconduct in research-related activities. In addition, the grants contract policy affirms Lifespan's intention to obtain grants and contracts from sponsors and to abide by the sponsors' requirements. Furthermore, the research conflict of interest policy describes established mechanisms to identify, analyze, manage and

eliminate conflicts of interest that may be detrimental to our patients' safety and the reputation of Lifespan and our research staff.



Q- I have been offered a consulting position with a vendor outside of my role at Lifespan, what do I do?



A - Lifespan's policy CCPM 46, "Vendor Interactions" specifically denotes interactions with Vendors. Please contact the Office of Corporate Compliance for guidance on your specific situation.



The Lifespan Corporate Compliance Program Model

The Lifespan Corporate Compliance Program is designed to conform with the United States Federal Sentencing Guidelines. Our program works to ensure that compliance is a continuous activity involving all Lifespan team members, including the board of directors, and executive management. The program calls for the development and internal publication of necessary policies, monitors Lifespan activities to anticipate and prevent problems, and it ensures that problems, when identified, are appropriately investigated and resolved, including reporting violations to the government when necessary.

The Corporate Compliance Program is fully supported by the office of the president and the board of directors. The board of directors' audit and compliance committee provides guidance to the corporate compliance officer, who reports directly to this committee. The compliance officer also serves as the organization's privacy officer.



The executive corporate compliance committee, composed of various executive managers from each Lifespan partner and the corporate compliance officer, works to develop, implement and maintain the program.

On an ongoing basis the corporate compliance officer and her team review regulatory publications, conduct special investigations, and complete medical record documentation and billing compliance audits. In addition, the corporate compliance officer oversees general and specific compliance training programs and works with affiliate privacy officers. In the event that a compliance violation is discovered, Lifespan has the proper mechanisms in place to report the violation to the government.

How to Report a Suspected Violation

Every team member is expected to comply with all the policies and to report any suspected violations. Ignoring a potential violation could jeopardize the high quality of care we provide to the community.

The corporate compliance policies and the code of conduct are meant to guide individuals throughout the system. Lifespan team members must follow all laws, use sound judgment, and consult with their manager or the corporate compliance officer when in doubt.

There are five options for making inquiries about a compliance issue or for reporting a potential compliance violation:

1. Talk to your manager.
2. Contact your executive corporate compliance committee site representative.
3. Call the 24-hour employee response line at **1-888-678-5111**.
4. Complete a confidential employee response form via the Lifespan's intranet at **<https://intranet.lifespan.org>**.
"Report a Compliance Concern" is listed as a link at the bottom of the page.
5. Call the corporate compliance officer directly at **401-444-4728**.

The employee response line established for the Corporate Compliance Program is completely confidential.



Q- *If I report something anonymously through the Confidential Employee Response line, how will I get information on the follow up?*

A - *The Compliance & Privacy staff will communicate with you at a minimum, weekly. You will be provided the ability to create a user name and password in our Confidential Employee Response line system which will allow you to come back to the system as often as you would like to receive an update.*



Once a compliance concern is reported, the corporate compliance office, along with the executive corporate compliance committee, will investigate the circumstances, take the appropriate steps to prevent a similar offense if it is determined there is a problem, and document the resolution and mitigation of the issue as appropriate.

Nonretaliation for Reporting

Lifespan may not retaliate against any team member who reports a concern in good faith. While the team member is accountable for their own wrongdoing, anyone who retaliates against someone who has reported in good faith will be subject to investigation and, if confirmed, disciplinary action.

Team members should report any retaliation or harassment to a supervisor immediately or to the compliance officer or the Response Line at **1-888-678-5111**. Please refer to Lifespan Policy CCPM-53, "Prohibiting Intimidating or Retaliatory Acts."

Accessing Additional Information on the Program

Extensive information on the code of conduct and the accompanying supporting policies can be found in the Corporate Compliance Program policy listing and on the Lifespan intranet at <https://intranet.lifespan.org>. Scroll down to Corporate Compliance (located at the bottom of the page).

All team members are urged to review the code of conduct and the various policies via the intranet.

Your commitment to complying with the program is critical to Lifespan's continued success. If you have any questions or concerns, please consult your manager or call the corporate compliance office at **401-444-4728**.

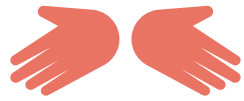




POLICIES



LAW



TRANSPARENCY



Lifespan

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