

RALPH LAUREN CENTER
FOR CANCER CARE

IN PARTNERSHIP WITH MEMORIAL SLOAN KETTERING

RALPH LAUREN CENTER FOR CANCER CARE

CODE *of* CONDUCT

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PURPOSE

The Ralph Lauren Center for Cancer Care (“RLCCC” or the “Center”) operates a freestanding diagnostic and treatment center, licensed under Article 28 of the New York State health law, located in the City of New York. The Center provides a broad range of health services to a largely medically underserved population. Many of the services provided by RLCCC are funded by the U.S Department of Health and Human Services grants or reimbursed by the New York State Medicaid program. Both sources of funding require The Center to comply with specified conditions and program requirements.

The RLCCC Code of Conduct describes the governing values and standards of conduct for everyone associated with The Center. The Code of Conduct is designed to set the ethics and integrity standards for RLCCC employees, Board members, volunteers, vendors, contractors and consultants.

All individuals governed by the RLCCC Code of Conduct have a personal obligation to uphold the highest standards of ethics and integrity and are expected to:

1. Familiarize themselves with The Center’s Code of Conduct and compliance procedures;
2. Review and understand the key policies governing their particular functions and responsibilities;
3. Report any fraud, abuse or other improper activity through the mechanisms established in the Code of Conduct;
4. Cooperate in RLCCC audits and investigations; and
5. Carry out their functions and responsibilities in a manner that demonstrates a commitment to honesty, integrity and compliance with the law.

With ongoing education, auditing and enforcement in the area of compliance, RLCCC will strive to adhere to all state, federal and insurance (contracted) guidelines relating to legal and ethical practices.

COMPLIANCE PROGRAM OVERVIEW

The RLCCC Compliance Program is led by the Corporate Compliance Officer. The goal of the Compliance Program is to prevent and detect situations in which our behaviors do not follow policies, laws or regulatory and federal healthcare program rules. RLCCC does this by:

- Training and educating our workforce,
- Monitoring high-risk areas,
- Maintaining anonymous and confidential ways to report concerns,
- Responding promptly to compliance complaints,
- Protecting individuals who report concerns in good faith, and
- Taking corrective action when the rules are not followed.

Corporate Compliance Officer:

212.537.5347

Healthcare compliance programs are mandated by both federal and state laws. Healthcare regulations are enforced at the federal level by the Office of Inspector General (OIG) in the Department of Health and Human Services (DHHS) and at the state level of the Office of the Medicaid Inspector General (OMIG).

- ✓ *Fraud and Abuse:* Hospitals, outpatient facilities, doctors, and other healthcare providers can be found guilty of fraud or abuse if they knew or should have known something was wrong.

Fraud means intentionally misrepresenting facts, knowing that the deception could result in some unauthorized benefit – usually payment from a healthcare program such as Medicare, Medicaid, or a private insurer.

Abuse involves actions that are inconsistent with accepted sound medical, business, or fiscal practices. Abuse directly or indirectly results in unnecessary costs or improper payments. Both fraud and abuse carry significant penalties.

- ✓ *Penalties:* If RLCCC or you are found guilty of violating compliance regulations, we or you could be subject to financial penalties; exclusion from participation in Medicare/Medicaid and other federal healthcare programs; criminal penalties including imprisonment; and/or government oversight. RLCCC employees and staff that are found to be in violation of compliance regulations will be subject to disciplinary standards, up to and including termination.
- ✓ *Auditing and Monitoring:* The RLCCC Corporate Compliance Officer conducts routine reviews on an ongoing basis to monitor and assess adherence to federal and state laws.

REPORTING A CONCERN

If you have a good reason to believe that an activity is improper, it is your duty – **and a condition of your employment** – to report it as soon as possible.

RLCCC Confidential Compliance Hotline: If you are not comfortable raising a concern in your department or if you have raised a concern and feel that it has not been addressed you can call the RLCCC Confidential Compliance Hotline. The hotline is managed by an outside company that is in no way associated with RLCCC and is available 24 hours a day, 7 days a week. Reports can be made anonymously. You do not have to give your name or any identifying information.

You Are Protected from Retaliation: Being able to speak openly about compliance concerns is of the utmost importance to RLCCC. If you report a problem or concern in good faith, you will be protected from retaliation, retribution, and harassment. Employees who are found to have engaged in retaliation will be subject to disciplinary action up to and including loss of their job.

There are several ways you can report a concern:

1. Speak with your supervisor, manager or direct report.
2. Contact the Corporate Compliance Officer directly at **212.537.5347**
3. Call the RLCCC Confidential Compliance Hotline at **855.231.4277**

REGULATORY AFFAIRS

RLCCC is committed to following the laws and regulations that govern and impact all activities at The Center. Some of the government and private agencies responsible for overseeing what we do include:

- the Centers for Medicare and Medicaid Services (CMS),
- the New York State Office of the Medicaid Inspector General (OMIG),
- the Department of Health and Human Services (HHS),
- the Equal Opportunity Employment Administration (EEOC),
- the Occupational Safety and Health Administration (OSHA), and
- the New York State Department of Health.

As a part of ensuring compliance any of these agencies may conduct an unannounced on-site visit or request information by phone or mail. Should any of these circumstances occur you should immediately contact the Corporate Compliance Officer. The Corporate Compliance Officer will work with the appropriate department and staff to respond to the agencies request.

Responses to regulatory agencies must be truthful and open, misleading statements and/or destroying, hiding or altering documentation during a site visit or review is strictly prohibited by RLCCC.

PATIENT RIGHTS

RLCCC is committed to treating all patients with dignity and respect. This means recognizing that each patient has his or her own personal values, beliefs, and choices. The Center takes great lengths to ensure patients are safe and we are continuously working to improve the quality of care we provide.

Privacy - RLCCC is also committed to protecting the privacy of our patients' information. Our privacy policies are designed to ensure that access to patient information is provided only to those who have a right to this information. You should access patient health information only when you need this information to perform your job.

- Patient information should only be shared with individuals or organizations that are authorized to have it.
- Always follow procedures when faxing, mailing, or e-mailing patient data outside of RLCCC. This helps keep patient information secure and safe.
- You should not talk about patients in public areas where private information may be overheard by others.
- Never share passwords, and always log off applications that contain patient or other sensitive information.

Gifts from Patients – It is the policy of RLCCC that we only accept very limited gifts from patients. Valuable gifts such as performance or sporting event tickets, gifts cards and other items with a cash face value of over \$25 are not acceptable. Many patients are grateful for the care and service that we provide and want to express their appreciation by offering gifts. Gift giving can often be misinterpreted therefore valuable gifts or gifts of cash may never be accepted. If you have questions regarding the gift from patients' policy please contact the Corporate Compliance Officer.

EMPLOYEES RIGHTS

RLCCC recognizes the contributions that each and every one of its employees makes to our mission and success.

Equal Opportunity - RLCCC is an equal opportunity employer. We do not discriminate based on race, color, religion, gender, age, national origin, marital status, citizenship status, disability, veteran status, or sexual orientation.

Harassment or Discrimination in the Workplace – RLCCC does not tolerate harassment or discrimination of any kind. All employees have a right to work in an environment where everyone is treated with respect and dignity. If you feel like you are being harassed or discriminated against in the workplace, contact the Corporate Compliance Officer or your supervisor.

Exclusion Checks – All job applicants and RLCCC employees are required to disclose whether they have been excluded from participation in any federal or state healthcare programs. RLCCC conducts exclusion background checks on all job applicants and checks government databases on a regular basis to ensure current employees have not been excluded. Policy prohibits RLCCC from employing anyone who is excluded from participation in a healthcare program. Any employee who becomes excluded is subject to immediate termination.

Health and Safety – We follow all health and safety policies and procedure in order to maintain a physical environment free of hazard. RLCCC follows all federal, state and city safety and environmental protection regulations to protect our employees and patients. Training is provided for the following:

- Handling and storing hazardous materials,
- Disposing of hazardous wastes,
- Fire prevention, and
- Response to accidents and emergencies.

Drug Free Workplace - RLCCC prohibits the unauthorized manufacture, possession, use, sale, and distribution of drugs in the workplace. Employees are prohibited from being under the influence of alcohol, illegal drug, or any non-prescribed controlled substance while at work or conducting business as a representative of RLCCC. We reserve the right to search employee's belongings while on RLCCC premises.

Violence-Free Workplace – We do not tolerate aggression or violence on RLCCC premises. If you see someone being violent or threatening, you must report it immediately to a supervisor or the Corporate Compliance Officer.

WORKING WITH INDUSTRY

RLCCC's work with industry provides many benefits to the care that we provide to our patients and to the community. We recognize the many benefits that these relationships offer. However, we also work to ensure that these relationships do not compromise our clinical judgement or influence purchasing decisions.

Conflicts of Interest – When making business decisions, we must always consider what's in RLCCC's best interest. A conflict of interest may exist if your personal interests, activities, or relationships make it hard to perform your duties for RLCCC objectively and effectively. In order to safeguard the integrity and objectivity of our clinical judgment and business decision making, all staff are required to disclose outside activities that may create conflicts of interest.

Business Courtesies - As a general rule, RLCCC employees may not accept gifts or other business courtesies from industry.

If you have questions regarding work with industry please contact the Corporate Compliance Officer.

BUSINESS AT RLCCC

RLCCC conducts business ethically and legally. We comply with all federal and state regulations and always conduct business in support of our mission. We monitor and audit our business practices on a regular basis to ensure compliance with both internal and external standards and best practices.

Billing - Our billing policies follow all federal and state regulations and private payer rules. We bill only for medically necessary services that have been ordered and documented in patients' medical records.

Financial Reporting – We are accurate and complete when documenting and reporting our financial records.

Development and Fundraising Activities – RLCCC is grateful for the generous donations from many benefactors. We are committed to following all rules and regulations governing charitable fundraising.

Marketing and Advertising - We are honest and truthful about our services, capabilities and treatment in our marketing and advertising activities and materials. Our marketing activities are designed to educate the public, provide information to the community, and increase awareness of our services.

Endorsements - RLCCC and its employees do not express support or make endorsements for products or commercial ventures. This includes vendors with whom we do business. Requests or proposals to use RLCCC's name, logo, or likeness for an endorsement must be reviewed and approved.