

NEW ENGLAND SINAI HOSPITAL AND REHABILITATION CENTER

**STANDARDS OF CONDUCT
Corporate Compliance Plan**

Preamble

New England Sinai Hospital (Sinai) is committed to the prevention, detection and resolution of fraud, or any instances of conduct that do not conform to federal, state and private health care program requirements. Sinai values honesty, integrity and high ethical standards in the conduct of its business.

Standards of Conduct

In accordance with Sinai's Compliance Plan, all employees and independent contractors are required to conform to the following standards. Violation of such standards may be grounds for corrective action.

All evidence or suspicion of fraudulent activity should be reported to the Compliance Officer who can be reached at ext. 1211.

- The hospital shall bill only for services actually rendered;
- The hospital shall follow appropriate accounting principles in the filing of cost reports;
- The hospital shall avoid all instances of duplicate billing, up-coding and unbundling;
- The hospital shall promptly refund all payer credit balances as defined by the Compliance Plan;
- The hospital shall prohibit any activity that violates the anti-kickback statute;
- The hospital shall ensure proper and timely documentation of physician and other professional services prior to billing;
- The medical staff shall order only those services or tests that are believed to be medically necessary;
- Medical Records and Billing staff shall adhere to ICD-9 CM and CPT/HCPCS coding principles;
- No services or tests shall be performed on a patient without an order;
- The hospital shall annually conduct an educational program on compliance;
- The hospital shall assure freedom of choice for all patients with regard to discharge - planning; and
- Each employee who is materially involved in Sinai's documentation, billing and marketing practices has an obligation to familiarize himself with all applicable laws and regulations, and to adhere at all times to those requirements in regards to the above.

When any question or uncertainty regarding these requirements exists, it is incumbent upon, and the obligation of each employee to seek guidance from a knowledgeable supervisor, administrator, or attorney for the hospital.

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