

May 21, 2018

An Important Communication from the WCHN Corporate Compliance Office

**WESTERN CONNECTICUT HEALTH NETWORK COMPLIANCE AND ETHICS HELPLINE –
ASK QUESTIONS. VOICE YOUR CONCERNS. REPORT IMPROPER CONDUCT.**

All Western Connecticut Health Network (“WCHN”) workforce members, business affiliates, and agents (collectively “Covered Individuals”) are responsible for fulfilling their day-to-day WCHN work functions, duties, and role in a manner that is: (i) ethical and legally compliant; (ii) consistent with WCHN’s mission, values, strategic goals, and *Code of Conduct and Business Ethics*; and (iii) centered on delivering the highest level and quality of patient care services. To that end, WCHN encourages and expects all Covered Individuals to promptly report any activity or other form of conduct that is contrary to or otherwise interferes with the fulfillment of these important responsibilities. Some examples of prohibited conduct include activities that:

- constitute fraud, waste, and abuse;
- violate patient rights;
- involve the provision of substandard patient care;
- involve the mishandling of confidential patient, employee, and/or WCHN business information;
- harm the environment; or
- create an uncivil and/or unsafe workplace.

Accordingly, we call on all Covered Individuals to do the following to help eliminate prohibited conduct: ***Ask Questions. Voice Your Concerns. Report Improper Conduct.***

To facilitate open communication of compliance-related questions, issues or concerns, WCHN has established the following toll-free Confidential and Anonymous Compliance and Ethics Helpline (the “Helpline”) that is available to all Covered Individuals: **1-844-395-9331**. We remind Covered Individuals that WCHN is committed to protecting whistleblowers and strictly prohibits retribution, harassment or any other form of retaliation that stems from engaging the WCHN Corporate Compliance Office for guidance on a particular topic or the good faith reporting of compliance issues and concerns.

Attached you will find the official Helpline poster, which provides additional information regarding the Helpline including further examples of prohibited conduct that must be reported.

Thank you for your valued contribution in assisting WCHN in meeting its compliance goals and initiatives and for supporting the WCHN Compliance and Ethics Program.



Wayne A. McNulty
Senior Vice President &
Chief Compliance, Audit & Privacy Officer

Western Connecticut Health Network Compliance and Ethics Helpline

Ask Questions. Voice Your Concerns. Report Improper Conduct.

At Western Connecticut Health Network ("WCHN"), we hold the highest level of value and respect for our patients, workforce, and affiliated business personnel. Accordingly, WCHN is committed to delivering patient care services and conducting its business initiatives in an ethical and legally compliant manner with integrity being at the cornerstone of our mission and strategic goals. All WCHN workforce members, business affiliates, and agents are expected to assist WCHN in its compliance efforts by promptly reporting compliance issues or concerns that they become aware of including, for example, any of the prohibited activities listed below. To facilitate open reporting without the fear of retribution, harassment or other forms of retaliation, WCHN has established the following toll-free Confidential and Anonymous Compliance and Ethics Helpline:

1-844-395-9331

Note: Reports may also be made confidentially online at: www.wchn.ethicspoint.com

- Administered through an independent company
- Connect with a live operator 24 hours a day, 7 days a week, 365 days a year
- WCHN protects whistleblowers and has established internal policies that strictly prohibit retaliation of any kind against individuals or entities who, in good faith, make a compliance report

Examples of Prohibited Activities

Fraud, Waste and Abuse, Conflicts of Interest, and Standards of Conduct

- Improper coding, billing or accounting
- Improper patient referrals
- Theft or misappropriation of WCHN assets or government funds
- Acceptance or offering of inappropriate gifts or gratuities
- Inappropriate business arrangements
- Actual or potential conflicts of interest
- Actual or suspected violations of Federal or State law or WCHN's internal policies and procedures including, without limitation, WCHN's Code of Conduct and Business Ethics
- Failure to comply with Federal healthcare program conditions of participation or private payor requirements
- Failure to refund overpayments

Privacy and Security of Patient, Employee, and other Confidential Information

- Inappropriate access, use, disclosure or disposition of confidential patient, workforce member or business information
- Violations of WCHN HIPAA, information technology or record management policies and procedures

Medical Necessity, Quality of Care, and Patient Rights

- Patient harassment, discrimination, abuse or other patient rights violations
- Preventable adverse patient events
- Human subject research misconduct
- Providing substandard, unsafe or medically unnecessary patient care

Environmental and Workplace Safety and the Protection of Human Resources

- Workforce member harassment including, without limitation, sexual harassment
- Workplace incivility or conduct that amounts to a hostile work environment
- Environmental hazards and other safety concerns
- Conduct that endangers the safety of the WCHN workforce
- The improper handling and/or disposal of medical waste, sharps, pharmaceuticals or radioactive or other toxic substances
- Workforce member discrimination