



From the office of
Wayne McNulty, JD
Chief Compliance Officer



November 8, 2023

National Corporate Compliance & Ethics Week: November 5-11, 2023

Awareness, Recognition, Reinforcement

The foundation of the Nuvance Health Compliance and Ethics Program (the “Program”) is primarily centered on cultivating a culture of integrity that is rooted in: (i) promoting ethical and legally compliant conduct; and (ii) combatting fraud, waste, and abuse. Accordingly, we ask all Nuvance Health workforce members, business affiliates, and agents (“Covered Individuals”) to please join us in celebrating this commitment by recognizing **National Corporate Compliance and Ethics Week, November 5-11, 2023**. As in previous years, our compliance theme continues to place a spotlight on ***Awareness, Recognition, and Reinforcement***.

- ***Awareness:*** As a Covered Individual, it is crucial that you review, become familiar with, and adhere to our organization’s ethical and compliance principles as well as applicable Federal and State administrative, civil, and criminal law, which are embodied in the following Nuvance Health standards of conduct, policies and procedures, and other compliance-related documents created by Nuvance Health to implement the Compliance Program:
 - [Health Quest Code of Conduct](#) and [Vendor Code of Conduct](#) (for Covered Individuals at Nuvance Health West);
 - [Western Connecticut Health Network Code of Conduct and Business Ethics](#) (for Covered Individuals at Nuvance Health East);
 - [Nuvance Health Compliance and Ethics Program Charter](#);
 - [Nuvance Health Whistleblower Protection Policy](#); and
 - [Deficit Reduction Act of 2005 Communication](#);

As you are aware, Nuvance Health’s confidential and anonymous Compliance and Ethics Helpline is available to you to request guidance or report any compliance issues, concerns, or incidents that you may become aware of at:

- **1-844-YES-WECOMPLY (1-844-937-9326)** at Nuvance Health West; and
- **1-844-395-9331** at Nuvance Health East;

Attached you will find the official Helpline poster, which provides additional information regarding the Helpline, including examples of prohibited conduct that must be reported. We encourage you to post this information in an area that is accessible to all.

Always remember to: ***Ask Questions. Voice Your Concerns. Report Improper Conduct.***

- ***Recognition:*** Supervisors, managers, directors, and leadership are encouraged to continue acknowledging and recognizing the compliance and ethics activities and efforts of their direct reports, which contribute to the effectiveness of the Program.
- ***Reinforcement:*** Through training and educational programs and, where necessary, corrective measures, the Corporate Compliance Office will continue to reinforce Nuvance Health’s dedication to an organizational culture that promotes Nuvance Health’s: (i) [Reason for Being and Values](#); and (ii) steadfast focus on detecting, deterring, and preventing illegal, unethical, and unprofessional conduct.

Additionally, Nuvance Health reinforces its compliance efforts by fairly and consistently enforcing its non-retaliation and whistleblower protection policies. Under these policies, Covered Individuals who engage in retaliatory conduct will face progressive disciplinary action up to and including, where appropriate, termination of employment, contract or other affiliation with Nuvance Health.

Join us in commemorating *National Corporate Compliance and Ethics Week* by chatting with a member of the Nuvance Health Compliance Team, who will be present at various Nuvance Health locations this week, or by visiting Nuvance

Health's *The Hub* and external web pages listed below. There you will find: (i) compliance week activities; and (ii) numerous compliance-related resources.

- **Nuvance Health *The Hub***

- [Nuvance Health East](#)
- [Nuvance Health West](#)

- **Nuvance Health External Webpage**

- [Compliance | Nuvance Health](#)

Thank you for joining us in our celebration of *National Corporate Compliance and Ethics Week*. We greatly appreciate your commitment to the Program.

Nuvance Health

Compliance and Ethics Helpline

Ask Questions. Voice Your Concerns. Report Improper Conduct.

At Nuvance Health (“Nuvance”), we hold the highest level of value and respect for our patients, workforce, and affiliated business personnel. Accordingly, Nuvance 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 Nuvance workforce members, business affiliates, and agents are expected to assist Nuvance 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, Nuvance has established the following toll-free Confidential and Anonymous Compliance and Ethics Helpline:

1-844-395-9331 (Nuvance Health East)
1-844-YES-WECOMPLY (Nuvance Health West)

Note: anonymous and confidential reports may also be made online at:

www.nuvancehealth.ethicspoint.com

- Administered through an independent company
- Connect with a live operator 24 hours a day, 7 days a week, 365 days a year
- Nuvance 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 Nuvance assets or government funds
- Acceptance or offering of inappropriate gifts or gratuities
- Inappropriate business arrangements
- Employing or contracting with an Excluded or Ineligible Person or Entity
- Actual or suspected violations of Federal or State law or Nuvance’s internal policies and procedures including, without limitation, Nuvance’s standards of conduct
- Failure to comply with Federal healthcare program conditions of participation or private payor requirements
- Failure to report and return overpayments and implement corrective measures to reduce the likelihood of future overpayments
- Actual or potential conflicts of interest

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 Nuvance 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
- Failure to maintain sufficient medical record documentation to support services provided
- Human subject research misconduct
- Providing substandard, unsafe or medically unnecessary patient care
- Providing medical services to patients without being duly credentialed and privileged

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 Nuvance workforce
- The improper handling and/or disposal of medical waste, sharps, pharmaceuticals or radioactive or other toxic substances
- Workforce member discrimination

Danbury Hospital, New Milford Hospital, Northern Dutchess Hospital, Norwalk Hospital, Putnam Hospital, Sharon Hospital, Vassar Brothers Medical Center, Eastern New York Medical Services, P.C., Nuvance Health Medical Practice CT, Inc., Nuvance Health Medical Practice, P.C., Health Quest Home Care, Inc., Western Connecticut Home Care, Inc., Hudson Valley Cardiovascular Practice, P.C., and all other Nuvance Health affiliated entities.

