

Nuvance Health Compliance and Ethics Helpline

Ask Questions. Voice Your Concerns. Report Improper Conduct.SM

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-YES-WECOMPLY (1-844-937-9326)

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
- Violations of the Foreign Corrupt Practices Act
- Violations of the U.S. Government’s export controls and sanctions laws
- Financial statement fraud and other financial wrongdoing
- 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 timely report and return overpayments and implement appropriate corrective measures
- Actual or potential conflicts of interest
- Refusal to cooperate in an internal investigation involving a violation of the Nuvance Compliance and Ethics Program
- Fraudulent or corrupt conduct
- Embezzlement, bribery, kickbacks, and abuse or misuse of corporate assets

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

- Inappropriate access, use, disclosure, transmission, or disposition of confidential patient, workforce member or business information
- Violations of Nuvance HIPAA (as well as other patient privacy and security policies), information technology, employee privacy 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 or other scientific research-related violations
- 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
- Engagement in retaliatory conduct