
Compliance Office
718-589-2440 Ext 4418
Compliance Hotline
1-800-826-6762

CODE OF CONDUCT

Revised 2018

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Dear Fellow Associates:

Urban Health Plan (UHP) has a long history and tradition of responsible and ethical behavior, which has earned UHP & its associates the respect and trust of patients/clients, professional colleagues, the community, and the health care system at large.

In this regard we have adopted a Corporate Compliance Program to make sure that this tradition is maintained and that we all continue to strive for excellence. As an organization, we devote ourselves to delivering the highest quality care and related social services, while meeting rigorous professional standards and adhering to the strictest ethical and legal guiding principles.

Through our Corporate Compliance Program, UHP aims to ensure that all board members, associates, independent contractors, and all those associated with UHP, function in an ethical environment. The Code of Conduct outlines principles for performance in the workplace and specifies organizational expectations with regard to all applicable laws and regulations.

UHP provides the necessary information and related training to ensure that all associates are fully aware of what is required from their position. The Compliance Program defines ways for an individual to report suspected noncompliance issues, so that they can be addressed promptly.

The Code of Conduct embodies our commitment to ethical, professional, and legal standards, and helps us make the right choices when confronted with difficult decisions. This will enable UHP to sustain the trust of our patients/clients, their families, board members, third-party payers, government regulators, vendors, our community and one another.

Please read the Code of Conduct carefully and completely and participate actively in the orientation and training. If you have any questions please seek assistance from your supervisors, the Human Resources Department, or the Compliance Office.

Thank you for your cooperation and support in making this program a success, and for helping us maintain an ethical and lawful environment in which to serve our patients/clients.



Sincerely,

A handwritten signature in black ink that reads "Paloma Hernandez". The signature is fluid and cursive.

Paloma Hernandez
President & CEO

UHP is a mission-driven entity and a leader in the provision of world-class primary and specialty health care and related social services. With over 40 years of service and a deeply rooted foundation in the South Bronx, UHP is dedicated to rendering care in a nonjudgmental, trustworthy, and patient-focused holistic manner, with an emphasis on prevention through education and the provision of state-of-the-art services.

Our mission statement defines why the organization exists and what we strive to achieve. Our vision statement illustrates the mental picture we have for ourselves and our community in the future. Our values communicate those things we hold close to our hearts and define who we are. Our Principles of Behavior guides us in our day-to-day activities by emphasizing an expected set of behaviors.

MISSION STATEMENT

UHP's mission is to continuously improve the health of communities and the quality of life of the people we serve by providing affordable, comprehensive, quality primary and specialty health care and by assuring the performance and advancement of innovative best practices

VISION STATEMENT

UHP will remain nationally acclaimed through its informative and innovative approach to fostering healthy and vibrant communities.

OUR VALUES

Excellence drives everything we do. We strive for superior performance to assure health equity and to improve the quality of life of the communities we serve. We enjoy what we do, we have fun.

Diversity We nonjudgmentally embrace our differences and accept all cultures. We are a welcoming and family-centered organization characterized by respect and empathy.

Trust characterizes our every interaction. Our culture is one of integrity, transparency, credibility and open communication. We are responsible and accountable for all of our actions.

Patient-Focused Holistic Care Healthy, happy people is our goal. Our focus is timely, safe, efficient and effective services. We strive to heal the mind, body and spirit by delivering care that is individualized, confidential and coordinated.

Continuous Improvement & Innovation We are process improvement experts. The quest for continued performance improvement and innovation drives our work. Continuous learning and optimization of technology allows us to adapt to evidence-based guidelines and develop best practices. We transform health care.

Community is at the heart of everything we do. We are a warm and nurturing family that puts people first. We value and invest in ourselves and our communities in order to make a positive impact on social conditions.

PRINCIPLES OF BEHAVIOR

**We live the mission
& put patients first**

**We treat everyone with
dignity & respect**

We are fair, honest & kind

We count on each other

**We know our patients & meet
their needs**

We are better than good

**Before saying no, we find
a way to say yes**

We make work fun

Together, we innovate & transform

UHP, with the support of its board and management, has established a comprehensive Corporate Compliance Program and Code of Conduct in order to create a culture that promotes detection, correction and prevention of instances of conduct that do not conform to the organization's internal ethical or business practice standards, or to federal, state or local laws or regulations.

Within the Corporate Compliance Program, the Code of Conduct is the foundation of the program, which serves as the guiding principle for UHP's rules, values, and expectations of behavior for associates and all those affiliated with UHP. The Code of Conduct provides an overview of the highest ethical standards we are expected to follow, and promotes compliance with all applicable laws, regulations and UHP's business practice standards.

As a UHP associate, you should always act with a sense of ethics, making sure you're doing the right thing. Furthermore, it is important that you have an understanding of the Compliance Program, the Code of Conduct, and how it impacts you and your job responsibilities. The Code of Conduct applies to all associates, vendors, board members and all those affiliated with UHP.

We require everyone to fully cooperate with the Compliance Program because the program is only effective if everyone works together to ensure its success and understands the requirements under the law. The Code of Conduct does not cover every issue that may arise in the workplace and a more detailed overview of the Compliance Program is available in the Compliance Manual.

If there are questions or concerns about the Compliance Program or the Code of Conduct, please direct questions to your supervisor, the Human Resources Department, or the Compliance Office.



Question: You become aware of a situation that is troubling to you and may be an instance of noncompliance. However, you are unsure if you should report the concern or how to report it. What should you do?

Answer: Report the concern using our Unexpected Event (UE) Reporting process, as well as reporting the issue to your supervisor, coordinator, senior manager, or an executive team member. It is your duty as a UHP associate to immediately report any potential instances of noncompliance with UHP's policies and procedures, ethical standards, or federal, state, and local laws and regulations. A verbal or written report may also be made to the Human Resource Department, or the Compliance Office. If you do not feel comfortable reporting the instance to your supervisor, Human Resources Department or the Compliance Office, an anonymous report may be made through UHP's Compliance Hotline at 800-826-6762. For more information, refer to the Compliance Manual "Duty to Report" policy and procedure.

BASICS OF CORPORATE COMPLIANCE

The Corporate Compliance Program has been established to develop and continuously improve processes and behaviors that promote honest, ethical, safe and legal practices in our day-to-day operations. We each must conduct ourselves in a way that preserves and enhances the integrity of the organization and UHP's reputation in the community and larger health care system.

THE EIGHT ELEMENTS OF UHP's CORPORATE COMPLIANCE PROGRAM

In order to meet the generally accepted standard for an effective Corporate Compliance Program, UHP has established the following eight elements:

- 1** Development and distribution of written standards of conduct.
- 2** Designation of compliance personnel and a Corporate Compliance Committee responsible for operating and monitoring the Compliance Program.
- 3** Implementation of an ongoing education and training program for board members, associates, vendors and contractors.
- 4** Development of a system to report compliance issues through various lines of communication.
- 5** Development of a process to respond to allegations of improper/illegal activities and ways to enforce appropriate disciplinary standards and/or corrective action.
- 6** Use of internal audits and or other evaluation techniques to monitor compliance and assist in the reduction of problem areas.
- 7** Investigate with plans to improve identified problem areas.
- 8** Development of a process to periodically assess and address risk within UHP.

REPORTING POSSIBLE COMPLIANCE ISSUES

UHP expects that board members, associates, independent contractors, and all those affiliated with UHP will comply with the Corporate Compliance Program and Code of Conduct. It is the responsibility of all individuals to report any perceived or actual violations of law or ethical standards of behavior. Violations should be reported through our “Unexpected Events” reporting system, to a UHP supervisor, the Human Resources Department, the Compliance Office, and/or the Compliance Hotline. A reasonable belief that a violation may have occurred is sufficient to initiate a report. Disclosure of potential compliance issues allows for thorough investigation and a plan to implement or improve systems, processes, or policies, as needed.

It should be noted, that UHP maintains a “blame-free environment” and will not hold any individual responsible for reports made in “good faith.”

A “good faith” report is made with an honest belief that an issue exists but with no malicious intent involved. Individuals will not be intimidated or retaliated against for reporting or participating in an investigation around a violation of the Compliance Program or Code of Conduct. However, a violation of UHP’s Compliance Program, Code of Conduct, or any applicable federal, state, and local laws may lead to disciplinary actions up to and including termination.

FALSE CLAIMS ACT

UHP expects that board members, associates, independent contractors, and all those affiliated with UHP will become familiar with The Federal False Claims Act (31 U.S.C. [section symbol] 3729-33) and the New York State False Claims Act (Article 13 of the State Finance Law) and its mandates. The Federal/State False Claims Acts (the “FCA”) are laws that are intended to detect, correct, and prevent fraud, waste, and abuse in federally funded programs such as Medicare and Medicaid. The FCA makes it illegal to knowingly present a false or fraudulent claim to federal or state government programs for payment. Under the FCA, the term “knowingly” means either having actual knowledge that information is false or acting with deliberate ignorance or reckless disregard of the truth.

In addition, UHP has developed a Compliance Program to assist with targeting areas for review in an effort to detect, correct, and prevent possible fraud. All those associated with UHP should be aware of their responsibility and role in detecting and reporting fraud, waste, and abuse. If anyone becomes aware of any type of concern regarding fraud, waste, and abuse, it is recommended that the matter be referred to the Compliance Office for review and investigation initiated through the “Unexpected Event” Reporting System or through the anonymous Compliance Hotline at **1-800-826-6762**. Compliance personnel may also be reached at **718-589-2440** ext. 4418.

It should be noted that the FCA prohibits retaliation in the form of termination, demotion, suspension, harassment or any other discriminatory acts against employees for assisting in the prosecution of a FCA claim. UHP also does not tolerate retaliation or intimidation against anyone for reporting a perceived or potential violation of the federal or state FCA. Furthermore, UHP does not tolerate retaliation or intimidation against anyone for participating in the investigation of an alleged violation.

For more details about the Federal or State False Claims Acts, please contact the Human Resources Department or the Compliance Office.

BASIC RULES OF CONDUCT

UHP is committed to assuring that all those associated with it understand the organization's expectations of behavior. We must always assure that we conduct ourselves in a way that preserves and enhances the integrity of our organization.

As such, we will:

- Act with integrity when working with patients/clients, coworkers, and members of our local communities, and maintain an ethical and lawful environment.
- Provide the best quality services to our patients/clients while observing the highest standards of legal and ethical conduct.
- Exercise the utmost care in our day-to-day conduct, while striving to follow UHP's Mission, Vision, Values, and Principles of Behavior.
- Respect and be sensitive to the cultural values, religious beliefs, and needs of patients/clients, their family members, coworkers, and visitors.
- Make certain that all communications and exchanges of information, both within UHP and external to UHP, are truthful and correct.
- Avoid situations that may create a conflict of interest or the appearance of a conflict of interest, and/or immediately disclose any actual or possible conflict of interest.
- Not tolerate retaliation or intimidation against any associate who reports a violation or participates in an investigation.
- Make every effort to follow the Compliance Program and Code of Conduct.

QUALITY OF CARE & SERVICES

UHP is committed to providing comprehensive high-quality medical, dental, mental health and other social services in a safe and secure environment to our patients/clients.

As such, we will:

- Support our patients'/clients' rights to receive the necessary information regarding the UHP professionals providing care to them, UHP's policies and procedures, and UHP's fees for services.
- Provide the appropriate support and resources to help our patients/clients understand the services provided to them and UHP's fees for services.
- Respect the dignity, comfort and privacy of patients/clients and treat them all with consideration, courtesy and respect.
- Respect the right of patients/clients to participate in decisions about their care.
- Be sensitive to and value the cultural, religious and ethnic diversity of the population we serve and be mindful of their differing beliefs and values.
- Provide appropriate services regardless of gender, gender identity, age, race, color, religion, sex, national origin, citizenship, language, marital status, sexual orientation, disability, military status, inability to pay or any other characteristic protected by federal, state, or local laws.
- Have qualified practitioners provide necessary services throughout the entire continuum of care.
- Provide services to our patients/clients that work toward the best possible outcomes and that meet the patients'/clients' needs.

CONFIDENTIALITY & PRIVACY

UHP will actively safeguard the confidentiality of patients'/clients' information in strict accordance with existing laws and ethical standards. Patient/client information will be protected in all formats, whether written, verbal, or electronic.

As such, we will:

- Respect the privacy of our patients/clients and fellow associates and will avoid any release or access of private information from being seen, heard, or read without authorization.
- Not access a patient's/client's information or records without appropriate justification and/or authorization.
- Strictly adhere to all confidentiality rules that apply to patients/clients in mental health, substance abuse treatment, and HIV/AIDS programs.
- Not make inappropriate modifications to information or destroy information except as authorized.
- Protect and secure documents, including patient/client information containing sensitive or confidential data. Documents will be retained as required by federal, state, and local laws and regulations, and UHP's policies and procedures.
- Disclose information only in accordance with UHP's policies and procedures, as well as with applicable federal, state and local laws, rules and regulations.



Your cousin is a patient at UHP. She contacted you to tell you that she needs a letter from her doctor stating that she had a physical. She had her physical last month. She said she needs the letter for tomorrow and won't make it to the office in time to pick it up. She asked you to print the letter for her and bring it home. What should you do?

Answer: You cannot print the letter for your cousin. All patients must submit a written request to receive information from their chart. As an associate, you cannot access any client's medical record without proper authorization. Protected health information should only be accessed to carry out your job's functions in accordance with UHP's policies and procedures and federal and state laws and regulations. For more information, refer to the HIMS Manual "Medical Records Regulations" and "Release of Information" policies and procedures.

ENVIRONMENT OF CARE & ORGANIZATIONAL BEHAVIOR

UHP is dedicated to providing a comfortable and productive workplace that is secure and safe for patients/clients, associates, and visitors.

As such, we will:

- Respect the safety and security of patients/clients, visitors and associates in all of our activities.
- Immediately report to our supervisor any accident or incident that we are involved in or witness that occurs to a patient/client, associate, or visitor, and document these accidents or incidents through UHP's "Unexpected Event" Reporting System.
- Follow all safety and infection control policies and procedures to ensure a safe work environment.
- Understand and adhere to applicable laws, rules, and regulations of the U.S. Occupational Safety and Health Administration (OSHA) and related state agencies.
- Follow UHP's policies and procedures addressing the proper handling, storage, use and disposal of hazardous materials, pollutants or infectious wastes.
- Maintain a work environment free of tobacco, alcohol and illegal drugs. UHP does not allow for the distribution, possession, or illegal use of controlled substances in the workplace.

- Forbid the possession of any weapon, dangerous instrument or substances while on UHP's premises.

- Not tolerate any sign or behavior from an associate that may be viewed as harassment, discrimination, or bullying, or that is threatening, abusive, or aggressive in nature.

Harassment, discrimination and abuse may come in the form of:

- Unwelcome remarks, gestures, or physical contact
- Displaying offensive, derogatory or sexually explicit pictures or other materials
- Offensive or derogatory jokes or comments
- Verbal or physical abuse or threats

NOTE: If you believe you are a victim of discrimination or harassment, you should initiate a report through our UE reporting process and inform your supervisor or coordinator. If you do not feel comfortable reporting it to your supervisor, directly contact the Human Resources Department or the Compliance Office.



You notice a sharps container that is not operating properly and could cause a needle stick. You would like to report it but you are running behind schedule and are concerned you won't finish your work. What should you do?

Answer: We must strive to ensure a safe environment for clients and associates. Therefore we must actively support all safety and infection control policies and procedures. An immediate call to your supervisor or coordinator, and submitting a work order to the Facilities Department could prevent an incident. You must also submit a "UE" detailing the instance encountered. For more information, refer to the Environment of Care manual, "Reporting Spills, Exposure, and Other Incidents" policy and procedure.

BUSINESS ETHICS & COMPLIANCE

UHP conducts business in a manner that is in the best interest of the organization, the community, and those whom we serve by using an approach that is ethical, honest, and in accordance with applicable laws and regulations.

As such, we will:

- Report any event that violates, seems to violate or break any law, regulation, safety standard, health center policy, or the Code of Conduct, to a supervisor, the Human Resources Department, or the Compliance Office. Disclosure should be initiated through the “Unexpected Event (UE)” reporting system.
- Refrain from offering or receiving, or appearing to be offering or receiving, any form of incentives, or payment, to influence the referral or purchase of any health care service including:
 - The offering or giving of incentives or gifts to patients/clients, providers, or other organizations to encourage the referral of patients/clients to UHP;
 - The acceptance of any incentives, gifts or preferential treatment from vendors to influence the use of a particular good or service.

- Avoid the inappropriate disclosure of UHP private corporate information, intellectual property, financial information, salary, fringe benefit and personnel information, and/or other specific information, for personal gain or other improper use.
- Not participate with competitors or others in any activities that may illegally limit competition.
- Prepare and submit accurate and truthful information to federal, state and other regulatory authorities in accordance with applicable time frames.
- Perform outreach, marketing and advertising accurately and ethically.
- Maintain up-to-date knowledge of applicable federal, state, and local laws and regulations.
- Continuously initiate improvement activities and identify and implement corrective actions as needed, based on information received through the Compliance Program and/or continuous performance improvement and risk management activities.



A patient offers you an expensive looking watch as a way to thank you for a pleasant experience every time they visit the office. What should you do?

Answer: Do not accept the watch. As a UHP associate, it is your responsibility to treat patients with dignity and respect. Gifts should not be anticipated for doing what is expected of you at work. Gifts may possibly influence the exercise of proper business judgment, and regardless of the intent, may prevent you from following existing policies and procedures. For more information, refer to the Compliance Manual, “Policy on Acceptance and/or Solicitation of Gifts and Benefits.”

CONFLICT OF INTEREST

UHP does not tolerate associates, independent contractors, board members and all those affiliated with us, engaging in any activity that may conflict with the best interests of UHP. We must avoid business relationships and actions that could potentially or actually interfere with or be perceived as interfering with our business decisions.

As such, we will:

- Dedicate our time, effort, and ability toward properly performing our duties on behalf of UHP and its patients/clients during business hours.
- Avoid participating in any activity, practice or act that may create a real or apparent conflict with the interests of UHP.
- Understand that we have a duty and obligation to always act in the best interest of UHP, particularly whenever we act on behalf of the organization in our dealings with vendors, patients/clients, the public or government agencies.
- Place UHP's interests ahead of any outside business, commercial or personal interest, and avoid situations in which conflict of interest, or the appearance of such conflict could arise.
- Not offer or receive gifts under circumstances in which the gift may possibly influence the exercise of proper business judgment, regardless of the intent.
- Not take part in any activity that could be damaging to UHP or behave in a manner that could be perceived as disloyal.
- Immediately disclose any actual or possible conflicts of interest.



You had unexpected expenses this month and do not have sufficient funds to pay your rent. You run into a patient you know from the neighborhood, who you heard randomly gives money to people he knows. When the patient sees you, he offers you money. What should you do?

Answer: It is important that all associates strive to create a culture of ethical, professional behavior and integrity. It is unprofessional to either borrow or lend money in the workplace. This behavior could lead to negative complications in your relationship with patients and other associates, thereby compromising your ability to fulfill your job. For more information, refer to the Compliance Manual “Conflict of Interest” policy.

EQUAL OPPORTUNITY

UHP recognizes our associates are one of our greatest resources and strengths. We are committed to the full development of all necessary skills to ensure that each associate is able to fulfill their job function and duties.

As such, we will:

- Recruit, select, train, retain, and promote associates on the basis of their skills, experience, and performance without regard to gender, age, race, color, religion, sex, national origin, citizenship, marital status, sexual orientation, disability, military status, or any other characteristic protected by applicable federal, state, or local laws.
- Conduct screening and where appropriate, verify credentialing of all prospective associates and current associates to ensure they are eligible to perform their duties as designated by our clinical or administrative policies and procedures.
- Expect all associates to conform to the standards of their professions and exercise suitable judgment in the performance of their duties and responsibilities.
- Encourage associates to develop and enhance their skills through their active participation in training programs and work to provide opportunities for professional and personal growth.

BILLING FOR SERVICES

UHP will make sure that billing is performed accurately, by following established policies and procedures and in accordance with all applicable laws and regulations.

As such, we will:

- Not refuse services to a patient/client due to their inability to pay, and will offer a sliding fee scale discount to all those that qualify.
- Ensure that coding and billing performed by UHP associates is correct and accurately reflects services provided.
- Strive to identify errors, report them to our supervisor, and correct them properly and in a timely fashion.
- Promptly investigate overpayments and, when appropriate, initiate a refund to any and all third-party payers or patients.
- Observe strict compliance with all Medicare and Medicaid laws and regulations, and other guidelines established by the various payers.
- Not hire, do business with, or bill for services provided by individuals or entities excluded from participation in federal health care programs or other governmental programs.
- Maintain appropriate documentation to support coding, billing, and sliding fee scale discounts offered.



You find out that a particular service is not in agreement with the Electronic Health Record (EHR). The service was not properly coded, procedures were not checked, and the service in the record does not accurately reflect the medical services performed. The provider is very busy and you do not want to disturb them. What should you do?

Answer: The provider must be informed of the potential errors and corrections. The EHR is a source of documentation for the billing process. Thus, we should make every effort to quality-check the input into the EHR, ensuring that services are properly and appropriately documented in the system. We must be sure to identify errors and report them to our supervisor, coordinator, or senior manager. For more information, refer to the HIMS Manual “Medical Records System, Documentation Standards” policy.

SAFEGUARDING ASSETS & EFFICIENT USE OF RESOURCES

UHP will protect assets against loss, theft and misuse. UHP will also ensure that work standards are established and that the economical and efficient use of resources is maximized.

As such, we will:

- Work in a productive fashion while on duty and report time and attendance accurately and honestly.
- Only incur expenses for travel and entertainment that are reasonable, usual and customary and in accordance with existing policies.
- Create and maintain internal controls to ensure protection of UHP's assets, as well as to ensure the accuracy and integrity of the financial statements and all other records and reports.
- Ensure to preserve UHP property and take appropriate measures to prevent any unexpected loss or misuse of equipment, supplies, materials or services.
- Issue and maintain financial reports, accounting records, and source documents that are accurate.
- Follow UHP's established policies and procedures governing record management and retention.
- Ensure cost-effective and efficient use of resources.

REPORTING SUSPECTED OR ACTUAL COMPLIANCE VIOLATIONS

Reporting suspected or actual compliance violations is an essential element of an effective Compliance Program. UHP maintains a process to report compliance issues while protecting the anonymity of the associates making the report. In addition, UHP maintains a “blame-free environment” where no individual will be disciplined, retaliated against or intimidated because he or she makes a report in good faith.

As such, we will:

- Establish and maintain an organizational culture where associates are willing and comfortable raising compliance-related questions or concerns.
- Communicate an understanding of the requirements of the Corporate Compliance Program and its importance throughout the organization.
- Promptly respond to issues or concerns identified by UHP associates.
- Initiate and implement actions to prevent potential compliance problems.
- Take appropriate steps to identify and correct any violations of the Compliance Program or Code of Conduct.
- Report any possible violations of law or ethical standards.

■ Thoroughly investigate reported areas of concern and address issues within a timely manner.

■ Cooperate with any investigation related to UHP. Associates and all those affiliated with UHP, may not interfere with or obstruct an investigation conducted by UHP, a third-party source on UHP's behalf, or any governmental agency.

Always Ask Yourself:

Q. Is the action legal and in accordance with federal/state/local rules and regulations?

Q. Does the action align with UHP's Mission, Vision, Values statements, and Principles of Behavior?

Q. Does the action comply with UHP's policies and procedures?

Q. Will the action meet the Code of Conduct and Corporate Compliance Program standards?

Q. Is the action fair and honest?

Q. How would the action appear if it were disclosed to the community or our peers?

HOW TO REPORT A SUSPECTED OR ACTUAL COMPLIANCE VIOLATION

In order for UHP to have a successful Compliance Program we must all actively work together. We have a duty to report any concerns or issues regarding noncompliance. Failure of any employee to report a suspected problem will result in disciplinary action up to and including termination depending upon the compliance issue. Disclosure of suspected or actual violations can be made in person, by telephone or in writing. Disclosure should first be made, if possible, to the associate's supervisor or coordinator. Reports should also be made through the "Unexpected Event" Reporting System and/or senior managers, executive team members, the Human Resource Department, the Compliance Office. If you do not feel comfortable reporting the issue to a supervisor, you may report the issue directly to the Human Resources Department or the Compliance Office.

RESOURCES FOR ADDRESSING CONCERNS

The "Unexpected Event" Reporting System is a process that documents unintended events and where possible ensures and facilitates performance or process improvement. It allows associates and others affiliated with UHP to report problems or concerns, or to ask questions anonymously. All reports will be kept confidential to the extent permitted by law and by UHP's need to investigate the incident.

It should be noted that UHP maintains a "blame-free environment," and no associate will be disciplined, retaliated against, or intimidated due to a report made in good faith. However, acts that are considered to be "blame worthy" include a violation of the law, an intentionally unsafe act with no legitimate reason, a criminal act, or an act involving alcohol or other intoxicants.

This Code of Conduct does not address all issues that may arise in the workplace. The following chart summarizes which UHP resource you should contact to address specific questions or concerns.

TYPE OF QUESTION OR CONCERN	YOU SHOULD CONTACT
Workplace- or employment-related, including questions or concerns about your job, company policies and procedures, etc.	Begin with the chain of command, i.e., start with the person to whom you report.
Employment-related issues or questions about Human Resources policies and procedures, labor relations, compensation, employment actions, payroll policies, benefits, etc.	Human Resources Department 718-542-5555, ext. 3129
Unsafe conditions, workplace hazards, etc., or any event, incident or injury to a patient, associate or guest.	1. Call Facilities at 718-589-2440, ext. 4212 and / or Site Administrator 2. Follow Unexpected Event reporting policy and procedure
Questions about changes in the law or regulations affecting your department or job.	Begin with the chain of command, i.e., start with the person to whom you report.
Questions about code of ethics, policies and procedures, or to report suspected violations of the Code of Conduct, company policies and procedures or the law.	Human Resources Department 718-542-5555, ext. 3129 Compliance Office 718-589-2440, ext. 4418 UHP's Compliance Hotline 1-800-826-6762

