COMPLIANCE & PRIVACY

Code of Conduct

for The University of Vermont Health Network

THE University of Vermont HEALTH NETWORK

The heart and science of medicine.

RN

Nurse

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I. Introduction

This Code of Conduct applies to all employees, medical staff, students, volunteers, vendors and other members of the UVM Health Network community (referred to collectively as "Employees").

Who We Are

The University of Vermont Health Network (the Network) is an integrated academic health system that serves more than one million residents across Vermont and Northern New York with a shared mission: working together, we improve people's lives.

The partners are:

- The University of Vermont Medical Center
- The University of Vermont Health Network Medical Group
- The University of Vermont Health Network – Alice Hyde Medical Center
- The University of Vermont Health Network – Central Vermont Medical Center
- The University of Vermont Health Network – Champlain Valley Physicians Hospital
- The University of Vermont Health Network – Elizabethtown Community Hospital
- The University of Vermont Health Network – Porter Medical Center
- The University of Vermont Health Network – Home Health & Hospice

The Network consists of hospitals, nursing facilities, an academic medical center, a multi-specialty medical group and a home health and hospice agency. Our 15,000 employees are driven to provide high-quality, cost-efficient care as close to home as possible. Strengthened by our academic connection to the University of Vermont, each of our partners remains committed to its local community by providing compassionate, personal care shaped by the latest medical advances and delivered by highly skilled experts.

Working together to better serve our communities makes us stronger, focused on collaboration and delivering equitable and compassionate care. As a team, the members of the Network improve the lives of our patients by delivering outstanding care as close to patients' homes as possible. We are able to accomplish things together that we could not do alone.

We work to provide accessible, high-quality care for our families, friends and communities while also innovating to focus on wellness as much as illness and to control health care costs. Our hospitals and physicians are bringing the best of community and academic medicine together, sharing knowledge and resources to give patients access to cutting-edge technology, advanced treatment options and the highest level of compassionate, patient-centered care — the heart and science of medicine.

Our Mission, Vision and Values

OUR MISSION

The Network's mission is to improve the health of the people in the communities we serve by integrating patient care, education and research in a caring environment.

OUR VISION

Working together, we improve people's lives.

OUR VALUES

- **We respect the dignity of all individuals and commit to doing our part to create a diverse, equitable and inclusive environment for our patients, their families, our employees and our communities.**
- **We seek to manage health care costs and offer financial assistance so that no one goes without the care they need.**
- **We recognize that a healthy climate is critical for all patients and communities, and we incorporate sustainable practices in all operations.**
- **We take great pride in the care we provide, researching new treatments and training the next generation of health care professionals.**
- **We work to preserve access to care in our local communities to ensure the best possible care at the right time, in the right place, and by the right provider.**
- **We are caring and compassionate to each other and to those we serve.**
- **We communicate openly and honestly with the communities we serve.**

The Network strives to act in a manner that (i) promotes the Network's mission, (ii) is consistent with the Network's values, and (iii) complies with all applicable laws, regulations, organizational policies and accreditation standards, as outlined in this Code and other policies.

II. Quality Patient Care

We are committed to the implementation of organization-wide practices foundational to a culture of safety. These efforts acknowledge the need to be a high-reliability organization, through cultivation of a non-punitive reporting environment, supporting interdisciplinary collaboration, elevating the voice of all members of the care team, and devoting resources to address safety concerns.

To maintain our culture of safety, Employees are expected to abide by our standards of quality, teamwork and respect. These standards promote a just culture, and include the following:

- Communicate in a truthful, professional and ethical manner
- Create a welcoming environment by uniformly practicing all common courtesies toward fellow employees, patients and their families
- Respect and value our patients and their families, and one another
- Acknowledge when you have made an error
- Be receptive to coaching
- Take personal responsibility for patient privacy and confidentiality
- Ask for help if you do not know what to do
- Correct and report mistakes, do not cover them up
- As an organization, the Network promotes a culture of safety and a just culture by:
  - Continually evaluating and improving system design
  - Providing feedback when system issues are identified
  - Holding individuals accountable for the quality of their choices

Intimidating and disrespectful behaviors threaten our foundation of excellent patient care and an environment of healing. These behaviors are unacceptable and include:

- Slamming or throwing objects in anger or disgust
- Willfully disregarding an applicable policy
- Criticizing others' performance or competency in a manner not aimed at improving the patient experience
- Deliberate acts done with intent to harm or deceive
- Disrupting the delivery of high-quality patient care
- Retaliating against anyone who addresses or reports unacceptable behavior
- Being unfit for duty for any reason, including because of the use or possession of alcoholic beverages or other drugs

It is important to report potential hazards or adverse events at the time they are identified or occur. Each Network affiliate maintains a system to report adverse events and determine root causes in order to learn from adverse events and prevent future incidents. Information reported through these systems and the related root-cause analyses are confidential and protected by peer-review privilege.

PATIENT RIGHTS

We honor a patient's right to obtain treatment, make decisions regarding treatment and maintain privacy. We seek to have open communication between patients and caregivers, and to meet each patient's reasonable expectations. We are committed to providing care to all members of the community without regard to age, race, skin color, sex, sexual orientation, gender identity or expression, ethnicity, culture, place of birth, national origin, HIV status, religion, marital status, language, socioeconomic status, physical or mental disability, protected veteran status or obligation for service in the armed forces, or any other status protected by law. We are bound to protect our patients and respect patient rights during research, investigations and clinical trials. A patient's refusal to participate in a research study will not limit access to services.

ADVANCE DIRECTIVES

Patients have the right to prepare an advance directive and, as appropriate, the Network will provide information and education for patients about advance care planning. In an advance directive, a patient can specify which treatments they want (or don't want) and can name a family member or friend as their health care proxy (agent), someone who would make medical decisions for them if they weren't able to do so on their own. A patient's advance directive will be honored as required by law and within the capabilities of the Network. When an advance directive is received by a Network provider, it will be incorporated into the patient's medical record.

EMERGENCY TREATMENT

The Network's hospitals follow the Emergency Medical Treatment and Labor Act (EMTALA) and provide emergency medical screening and necessary stabilization to all patients, regardless of ability to pay. We will not delay emergency screening and necessary stabilizing treatment in order to seek financial and demographic information. Patients with emergency medical conditions should be transferred to another facility only at the patient's request or if the patient's medical needs cannot be met at the Network site and appropriate care is known to be available at another facility.

Q. A member of our department sometimes gets angry and throws things, but not in front of patients. Is this a problem?

Yes, actions like this can make an unsafe environment for patients, staff and any individuals that are within our facilities. People may want to avoid that person, and important communication could be missed. Respectful behavior in all areas leads to a safer environment.

Q. I made a mistake and it ended up hurting a patient. Should I tell anyone? Will I get in trouble?

Mistakes and patient injuries must always be reported. Tell your leader. We don't punish people for making good-faith mistakes. We try to identify how systems contribute to errors so we can continually improve and prevent future mistakes.

Q. My co-worker pokes fun at some team members based on their gender or race. What are the rules around that?

Any behavior that insults or makes fun of someone else is not allowed. The University of Vermont Health Network is committed to creating a healing environment for all. Dignity, respect, equity and justice are at the center of our work. Everyone, whether employees, patients, families and/or community members, should be treated with courtesy and respect. Discrimination or harassment on the basis of age, sex, sexual orientation, gender identity or expression, race, religion and many other characteristics is misconduct and you should report it to your leader or Human Resources.

III. Equity, Diversity and Inclusion

As the region's academic health system and major employer, we play an important role in creating a sense of community that fully embraces diversity and equity for our patients, their families, our visitors and our employees.

THE NETWORK IS COMMITTED TO:

- improve clinical outcomes and the patient care experience of our diverse patient populations
- build a workforce that represents the communities we serve
- leverage the richness and depth of ideas of a culturally diverse workforce to create more culturally responsive solutions and increase employee engagement
- provide an environment where all people feel welcomed, respected and valued

We are proud to serve people from all backgrounds, all orientations and from around the world — and we are committed to this important work.

FREEDOM FROM DISCRIMINATION AND HARASSMENT

We provide a workplace that practices non-discrimination and equal opportunity. All qualified persons, regardless of age, race, skin color, sex, sexual orientation, gender identity or expression, ethnicity, culture, place of birth, HIV status, national origin, religion, marital status, language, socioeconomic status, physical or mental disability, protected veteran status or obligation for service in the armed forces, or any other characteristic protected by law, are offered equal employment opportunities.

We are committed to diversity. Employees should respect the diverse opinions, beliefs and cultural differences of our staff, patients and visitors.

We do not tolerate harassment or unfair discrimination and treat such actions as a form of misconduct. Those who choose to file a complaint through the Network do not lose their right to file with an outside enforcement agency.

To file a complaint with the Network, please contact Human Resources at your work site, or use the Ethicspoint reporting resource **https://secure.ethicspoint.com/** or **877-518-3579**.

We do not tolerate bullying or unwelcome behavior that insults, humiliates or intimidates another individual or group. Anyone who is aware of such behavior should report it to their supervisor or Human Resources.

IV. Integrity in the Workplace

EXPECTATIONS OF ALL EMPLOYEES

We care about one another and the patients and families we serve. We know that our actions and behaviors can elevate the experience of others. Individually and collectively, we choose to treat others with respect, compassion, empathy and understanding to create a supportive environment for patients and families. We are committed to a culture of safety, high reliability and quality where the work environment supports teamwork and respect for all. We know that excellent customer service and excellent clinical care go hand in hand.

EMPLOYEE CONSCIENCE RIGHTS

The Network respects the cultural values, ethics, spiritual or religious beliefs and moral convictions of our staff. We recognize that there are situations where a conflict may exist between an Employee's cultural values, ethics, spiritual or religious beliefs and moral convictions and their participation in patient care. The Network provides a process by which an Employee may be excused from performing specific duties, provided that doing so does not endanger our duty to provide essential patient care. The Network balances the need for patients to receive the full range of safe, timely, effective care with the Employee's request to be reassigned from performing a specific type of care or treatment based on the Employee's values or beliefs. Employees should proactively raise concerns with their leader at the time of discovery about potential conflicts of care in order to give leaders the greatest possible opportunity to accommodate Employee requests.

SPEAKING UP IF SOMETHING ISN'T RIGHT

Employees have an affirmative obligation to report in good faith any known or suspected violation of a rule or policy, or other misconduct. Employees are encouraged to work through their supervisor or manager to report these issues, or to use the Network's confidential reporting resource, Ethicspoint, at https://secure.ethicspoint.com/ or 877-518-3579.

Reports will be treated confidentially. The Network is committed to a policy of non-retaliation against Employees who report suspected violations in good faith. The Network also expects all Employees who care for patients in any of its facilities to report medical errors, "near misses" and patient safety concerns.

FOLLOWING THE RULES

We are committed to acting in full compliance with all applicable laws, regulations, and organizational policies, as well as standards for accreditation. Employees are required to know and follow the laws, regulations, policies and procedures that apply to their jobs, and to ask for more information about rules or policies they don't understand. Failure to do so could result in exclusion from participation in federal or state health care programs, civil monetary penalties and loss of licensure, and could subject an Employee to corrective action, up to and including termination.

Employees are required to complete periodic training on applicable laws, regulations, policies and the Compliance and Privacy Plan.

Members of the Network's Board of Trustees are required to be educated about the Board's responsibility for oversight of compliance risk areas, the content and operation of our Compliance program, and the process for reporting compliance issues to the Board.

Vendors are required to undergo a certification process, which includes being educated about the requirements in this code, in order to be able to do business with the Network.

PROTECTING THE NETWORK'S RESOURCES

Employees should strive to make prudent and effective use of the Network's assets and resources, including time, supplies, equipment, space and information. This includes the use of the Network's funds for travel and entertainment-related expenses. Any use of the Network's assets or resources for personal financial gain is prohibited.

WORKPLACE VIOLENCE

The Network does not tolerate workplace violence. Workplace violence includes acts and threats of action, and verbal abuse as well as physical assaults. The Network seeks to provide an environment where incidents of workplace violence are avoided whenever possible. In addition, the Network will ensure consistency in the investigation of alleged instances of workplace violence, and respond immediately to in-progress incidents of violence.

The Network prohibits retaliation against an individual for the good faith reporting of alleged workplace violence, and ensures that victims of violence are supported and that the appropriate resources are made available to them.

IV. Integrity in the Workplace (continued)

WORKPLACE HEALTH AND SAFETY

To promote good health and protect patients and Employees, smoking is not permitted on any Network property.

Prescription and controlled medications and supplies must be handled properly and only by authorized individuals to minimize risks to patients, family members and Employees. Employees who become aware of inadequate security of drugs or controlled substances or the diversion of drugs from the organization must report the incident immediately.

To ensure that all Employees work in a safe environment, we follow federal and state laws and regulations regarding occupational safety. Employees who notice a potential or actual violation of occupational safety rules should report this to their supervisor or the organization's safety office.

PROTECTING THE ENVIRONMENT

We recognize that the health of the community is integral to the total health of the environment. We strive to ensure that day-to-day operations are founded in sound environmental practices in all aspects of care delivery. We strive to improve health and to mitigate the impact of climate change through efforts in the following areas: reduction of waste and conservation of natural resources; the use of safer chemicals wherever possible; the use of healthy, locally-produced foods; enforcing sustainable procurement guidelines; reduction of energy consumption and using green building design principles.

We are committed to complying with all environmental laws and regulations that relate to our operations. We operate our facilities with the necessary permits, approvals and controls, and we diligently use proper procedures to handle and dispose of all waste. Employees must understand how their job duties may impact the environment and follow all requirements for the proper handling of hazardous materials. Anyone aware of the improper release of a hazardous substance, improper disposal of medical waste, or any situation that may potentially damage the environment must immediately notify the appropriate supervisor.

ADDITIONAL LEADERSHIP RESPONSIBILITIES

Leaders are expected to foster a culture that promotes the highest standards of ethics and compliance. Everyone in the organization with supervisory responsibility is expected to be a role model for these standards and values, and should never sacrifice ethical and compliant behavior in the pursuit of business objectives.

Leaders should encourage staff to raise concerns and propose ideas free from the fear of retaliation or retribution. The Network does not tolerate retaliation against Employees who report suspected violations in good faith. Leaders are also responsible for ensuring that staff members have adequate information and resources to comply with laws, regulations and policies, as well as access to resources to help resolve ethical dilemmas.

V. Privacy and Security of Patient Information

It is a privilege to be entrusted with a patient's personal health information, and all members of the Network community have important obligations that accompany that privilege. We recognize that patients and their families trust us with private information in order to obtain the most effective and complete quality health care.

Maintaining a patient's privacy is the responsibility of every member of the Network workforce. You have a duty to actively avoid and prevent privacy violations, as well as a duty to report privacy incidents and to assist in mitigating any resulting harm. These rules apply to all types of patient information, including financial information, and all forms of information — spoken, written or electronic. Be familiar with the Network's privacy policies.

GENERAL PRINCIPLES

I. You may only access or disclose patient information to further patient care, conduct hospital operations, promote quality improvement and enhance education, and not out of curiosity or for personal interests.

II. Care coordination, financial operations and educational efforts require that patient information be shared with those with a need to know, but those sharing and receiving information must follow the principle of "minimum necessary" and respect for privacy and patient choice.

III. When an Employee becomes a patient, the separate roles of patient and Employee should remain clear and distinct.

IV. When discussing patient information with others involved in the patient's care, you must take reasonable precautions to minimize the chance that that information will be overheard by individuals not involved in that patient's care.

V. Communications technology is valuable to enhance patient care and coordinate care, but must be used carefully to avoid widespread dissemination of private information.

PARTICULAR CIRCUMSTANCES

A. Access to a Patient's Record

- You may access and use patient information only as needed for your work or educational program.
- You may not review patient lists or trackboards without a specific need for information.
- You may follow a patient you have previously cared for only if doing so would provide significant educational or quality information, and not out of curiosity.
- To optimize the quality of your own care as a patient, you may not access your own medical record through your standard workplace access. You may access your information via the online MyChart portal or obtain a copy of your record from Health Information Management.
- In order to maintain the highest level of confidentiality for all patients, you may not directly access the medical records or financial information of your family members, minor children, friends, staff members or other individuals for personal or non-work related purposes, even if authorization has been given. Patients may elect to grant proxy access to their MyChart accounts to a family member or friend by submitting the appropriate authorization form.

My friend is an inpatient at the hospital. May I look at their medical record because I am worried about them?

No. You may not look at a record because you are concerned about someone you know, or curious about a patient. You may only look at records you need to do your job.

B. Disclosing Patient Information

- We may disclose patient information to provide care to the patient, obtain payment for care, and operate our health care facilities. In general, any other disclosures require patient authorization. There are exceptions when information is legally required to be disclosed, is approved for disclosure under formal research processes, or is necessary to protect the public's health. Contact the Privacy Office for more information.
- If the patient agrees, you may share health information with a patient's family member, friend or other individuals identified by the patient as being involved in their care. If the patient is not available to agree or object or is incapacitated, you must exercise your professional judgment to determine whether it is in the patient's best interest to share information.
- Patients who are minors have privacy rights to certain information, including care related to mental health or substance use, as well as reproductive health. Check with the patient's provider or the Privacy Office if you are unsure if you should release information to parents or guardians.
- Please keep in mind that we live in a small community where many residents know the details of each other's lives. Sharing details about a patient such as a rare disease diagnosis, traumatic injury or general characteristics such as a job title, criminal history or community activities could result in a violation of privacy, even if a patient's name is not disclosed.

V. Privacy and Security of Patient Information (continued)

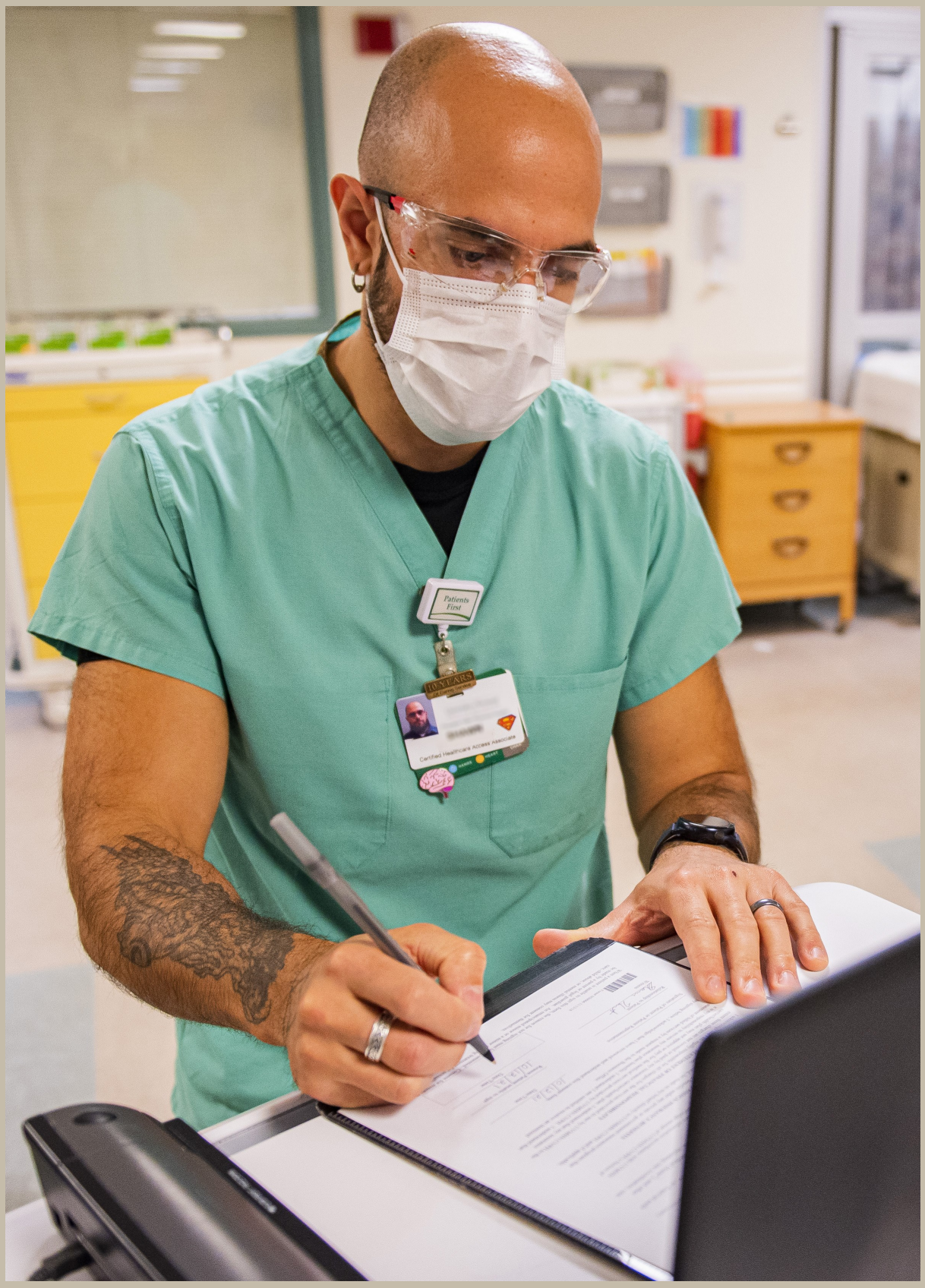
PARTICULAR CIRCUMSTANCES

C. Technology, Social Media and Photographs

- You must follow Network policies on security of data and devices, including password protection, encryption and data storage.
- You may not comment on or post on social media any information you learned about a patient through your work. Do not reach out to patients on social media. Do not contact the patient using any method unless you have a business need to contact the patient.
- Photographs may be taken for patient care purposes and included in a patient's medical record, and must be protected in accordance with privacy and security policies. Photographs of patients should be taken with Network-approved equipment and/or software applications, and may not be stored on personal devices.
- In general, photographs of Employees are not permitted without the individual Employee's permission.

D. Remedies and Corrective Action

- In the event that you become aware of a privacy incident, you must notify the Privacy Office and take appropriate steps to mitigate any improper disclosure. The Network will conduct a privacy breach analysis and, as applicable, notify the affected patient(s) and the HHS Office for Civil Rights or other entity of a privacy breach, as required by applicable law.
- In order to proactively protect patient privacy, the Network monitors Employee access to patient information on both a routine and as-needed basis. If a monitoring report indicates an Employee's access may be inconsistent with our privacy policies, the Privacy Office will investigate the access in collaboration with Human Resources and the Employee's leader(s).
- Any Employee who violates privacy policies will be subject to corrective action, up to and including termination.


Patients First
10 YEARS
Certified Healthcare Access Associate

VI. Accurate and Ethical Billing, Reporting and Financial Matters

We are committed to ensuring that bills to government programs, commercial payers and patients comply with laws, rules and contractual commitments. Every Employee has a responsibility to assist the Network in submitting complete and accurate claims for payment and quality reports. No one should intentionally or carelessly create inaccurate documentation, including using the wrong billing codes, falsifying the medical record, or billing for services that are not provided or are not medically necessary. Providers are obligated to provide complete, accurate and timely information in the patient's medical record to support the services rendered.

FINANCIAL AND QUALITY REPORTING

We are committed to maintaining complete and accurate financial and quality records. Every Employee is expected to be honest, complete and accurate in documentation and recordkeeping. We are required by laws and regulations to submit certain reports of our operating costs and other financial and quality information. We are committed to maintaining and filing complete and accurate cost reports and other data submissions.

The Network complies fully with applicable Certificate of Need (CON) laws, which require health care providers to obtain a CON before taking certain actions, such as committing to large capital expenditures or undertaking new services. We seek to maintain a cooperative and open relationship with state regulatory agencies and to provide Employees of the Network with education and training on the CON laws. Any project that is potentially subject to a CON must be reviewed and approved by the General Counsel before the project is initiated.

THOSE EXCLUDED FROM FEDERALLY-SPONSORED PROGRAMS

The Network does not hire or engage as contractors any person or entity who (1) is ineligible to participate in federal health care programs; or (2) has been convicted of a criminal offense related to the provision of health care items or services. All Employees and applicants are required to disclose whether they are ineligible persons before they start working at the Network. We routinely screen Employees against the government lists of such excluded and ineligible persons.

I believe my leader is entering false information in records. Should I report them? If I do, can they fire me?

If you believe your leader is falsifying documents, you may first want to discuss the issue with your leader. If you're not comfortable doing that, you may contact Compliance at **ComplianceOfficer@uvmhealth.org**, or report using **Ethicspoint**. Your leader may not retaliate against you for reporting misconduct in good faith – you have an obligation to report Compliance concerns, and the Network does not tolerate retaliation.

FALSE CLAIMS/ FRAUD, WASTE AND ABUSE

As required by law, the Network's policies provide detailed information to Employees about (a) the federal False Claims Act and Program Fraud Civil Remedies Act (and similar state legislation), (b) "whistleblower" protections under both federal and state law, and (c) our policies and procedures to prevent, detect and remedy fraud, waste and abuse.

Examples of the types of activities that would risk violating laws designed to prevent health care fraud include:

- Filing a claim for services that weren't provided or weren't provided as described on the claim
- Filing a claim for services without documentation to substantiate the performance of those services
- Submitting a claim containing information known to be false
- Adding false diagnoses or using a past diagnosis to represent the patient's current condition
- Billing for and accepting reimbursement for services that were not medically necessary

If Employees have any doubts or questions about whether any billing situation is correct, they should notify their supervisor or Compliance Officer.

PROTECTION OF BUSINESS RECORDS

The Network protects its data and business records from accidental or intentional modification, disclosure, destruction or use that is not authorized or appropriate. Network Employees may only access and use confidential information on a "need-to-know" basis to perform their particular duties, and must take appropriate measures to protect the confidentiality of Network records. Employees and others may disclose confidential information only to authorized individuals/third parties, and must report any violations of this policy to their supervisor, the Information Security Officer or the Privacy Officer.

Q. Our clinic bills the same set of services for every patient, even if they didn't receive all of them. Is that OK?

No. We need to bill based on what the patient actually received. The medical record should show the services that were provided. Billing for services that were not given and are not described in the medical record is not allowed and could result in fines and penalties.

Q. We are very busy. May I make my best guess when completing logs instead of checking every item?

No. It is important that our records are correct. Tell your leader if you are unable to complete work. We will see if the system can be improved to meet our goals.

VII. Ethical Business Relationships

NO PAYMENTS FOR REFERRALS

A patient's choice of health care provider should be based on quality and convenience for the patient, not on financial benefit to the provider. The Network does not pay for referrals or accept payment for any referrals we make. Federal and state laws prohibit payments in exchange for patient referrals or other business. "Payments" can be anything of value, such as a trip to a conference or free equipment. If Employees are aware of any inappropriate payments or gifts being offered or solicited, they should report the incident to their supervisor or the Compliance Officer.

GIFTS

The Network expects all Employees to uphold the highest ethical standards when interacting with vendors and patients and to avoid any arrangement that could improperly influence decision-making or patient care. In addition, federal and state laws place restrictions on the exchange of gifts or other benefits between the Network and its vendors or its patients. No personal gifts of any kind from vendors are permitted. Employees may not solicit, offer, or accept gifts to or from patients, vendors or others doing business with the Network, except as permitted by our Gifts policies. Our patients need to know that their care is not improperly influenced by gifts or other offers from vendors.

CONFLICTS OF INTEREST

The Network has a responsibility to maintain the public's trust. Our patients and community expect us to make unbiased decisions in providing patient care, choosing vendors or business partners, and hiring Employees. A conflict of interest may occur if an Employee's outside interests influence — or appear to influence — their job-related decisions or responsibilities. Our Conflict of Interest policy explains how Employees must disclose any relationship that could inappropriately impair that person's judgment in work-related decisions.

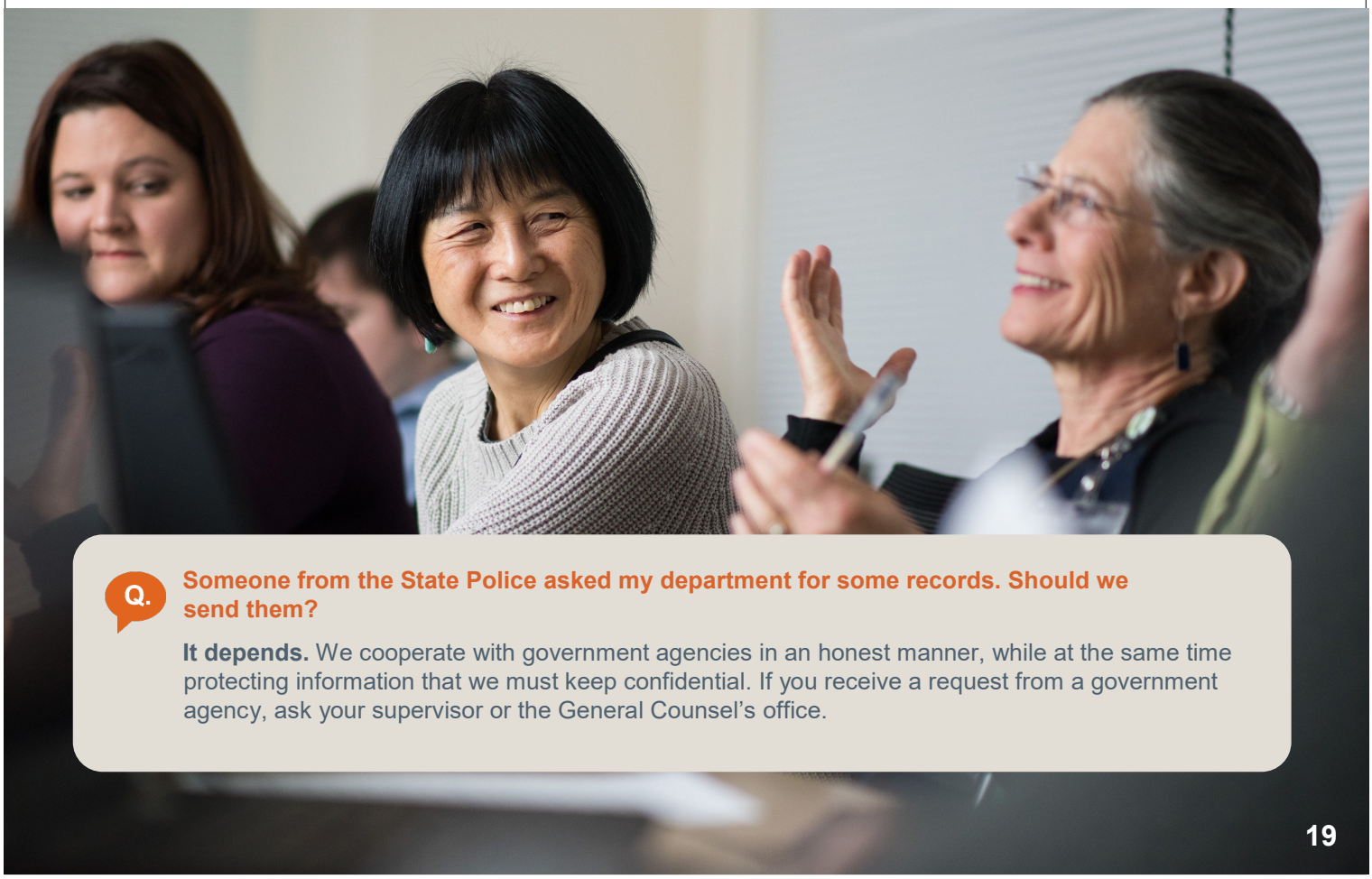
Q. A company that sells equipment to the hospital has offered me a free trip to a resort in Florida. May I accept the offer?

No. Gifts from vendors are not allowed. In some situations, vendors may pay for travel expenses to obtain training on their equipment. Refer to your organization's Gifts policy or check with your Compliance Officer.

COMMUNICATIONS WITH GOVERNMENTAL AGENCIES, REGULATORY AUTHORITIES AND THE MEDIA

It is the Network's policy to cooperate with all governmental agencies, regulatory authorities and accrediting bodies in a direct, open and honest manner. Employees should never mislead representatives of a governmental agency, regulatory authority or accrediting agency. We promptly and appropriately respond to government requests for information, such as a subpoena, summons, warrant, letter or verbal request, subject to confidentiality rules. Only certain people are authorized to accept these requests or respond to them on behalf of the Network or any Network provider. If you are asked to accept a legal document or to provide information to the government, accreditation body or other similar agency, consult with your supervisor, Office of the General Counsel, Risk Management, or the Compliance and Privacy Department.

The Network formally participates in social media communities to help educate our potential patients, current patients and their families about the Network and the services and programs we provide. Only Employees designated by the Network have the authority to speak on behalf of the organization in these channels or to the press. All Employees must abide by the Network's policies regarding social media, protect the confidentiality of patient and business information, and use social media responsibly.



Q. Someone from the State Police asked my department for some records. Should we send them?

It depends. We cooperate with government agencies in an honest manner, while at the same time protecting information that we must keep confidential. If you receive a request from a government agency, ask your supervisor or the General Counsel's office.

VIII. Additional Resources

https://secure.ethicspoint.com
or 877-518-3579
(Ethicspoint Reporting System)

PrivacyOfficer@uvmhealth.org

ComplianceOfficer@uvmhealth.org

Policies Procedures and Guidelines
Network Policies (sharepoint.com)

Notes

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THE
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HEALTH NETWORK

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