



Mass General Brigham

# A guide to ethical standards

Compliance, Audit & Business Integrity Department



# Ethical principles

## Employment standards

Mass General Brigham is committed to fair and respectful treatment of all employees.

## Creating and preserving records standard

Mass General Brigham is committed to creating and preserving truthful and correct business records.

## Safety and the environment standard

Mass General Brigham recognizes the important role a safe and healthy physical environment plays in promoting human well-being and is committed to the practice of health care that conserves natural resources and is non-polluting.

## Financial standard

Mass General Brigham is committed to acting as a responsible steward of the financial resources we receive to support our mission. We use these resources to accomplish the greatest public good.

## Research standard

Ethics and integrity are essential to the advancement of scientific knowledge. Mass General Brigham is committed to conducting research in accordance with the highest professional, ethical and legal standards.

## Patient care standard

Mass General Brigham is committed to providing the right care, safely and skillfully delivered to all our patients.

## Managing conflicts standard

Mass General Brigham is committed to carefully managing relationships with outside individuals and organizations to avoid either real or perceived bias in the conduct of our patient care, research and educational activities.

## Public communications standard

Mass General Brigham is committed to transparent, truthful, responsive and clear communications.

## Safeguarding confidential information standard

Mass General Brigham is committed to protecting the privacy and security of confidential information entrusted to us by our patients, health plan members, employees and other members of our community.

For generations our patients and health plan members, our employees and our larger community have been able to count on us as we have considered thoughtfully the implications and context of the decisions we make.



Anne Klibanski, MD  
President and CEO  
Mass General Brigham

Mass General Brigham is a talented and dedicated team supporting our hospitals each day in order to make care better for our patients. As an organization, we regularly examine new ways to improve the care we provide; we are committed to training the next generation of caregivers and leaders; and we push the boundaries of science to find the cures and treatments of tomorrow.

Mass General Brigham can also take great pride in long history of ethical leadership. For generations our patients and health plan members, our employees and our larger community have been able to count on us to make careful decisions. We hold ourselves to the highest standards because we believe transparent, ethical behavior is the core of our mission. As members of the Mass General Brigham community, it is our job to build on this proud tradition. Please read this guide carefully; in it you will find the standards that will help direct your work.

Integrity is at the heart of what we do. Thank you for your commitment to the trust that is placed in us by our patients, health plan members and their families and the communities we serve.

A handwritten signature in black ink, appearing to read "Anne Klibanski".

# Why should you read this booklet?

This guide to ethical standards will introduce you to principles that you are expected to follow as a member of the Mass General Brigham system. These principles apply to you if you are a board member, officer, employee, provider, volunteer or an agent acting on behalf of our organization. Not every ethical or policy question you may have will be answered here—but you will discover advice on finding specific answers you need as well as general principles of conduct to guide you in considering how best to handle situations where there may not be a specific rule, policy or procedure.

Mass General Brigham depends on each individual to make our shared commitment to high ethical and legal standards come to life. The trust and respect of our patients and our community have been built by repeated acts of integrity by individuals within Mass General Brigham and our member institutions over many years. Regardless of your role, you are responsible for protecting and adding to this long and proud tradition. If you have questions about these principles or how to apply them to a particular situation, please contact your supervisor or the Compliance, Audit & Business Integrity Department.

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Throughout this guide, you will find **learn more** sections with suggestions of policies or people to provide you with a deeper understanding of our ethical standards. Mass General Brigham policies can be found online on Vitals or through Mass General Brigham applications. Information on how to find institution-specific policies can also be found through Mass General Brigham applications or the institution intranet site. Links in this booklet are for in-network use only.

# Your ethical responsibilities

The standards and expectations included in this booklet apply to all board members, officers, employees, providers, volunteers and agents acting on behalf of our organization. Each of us is responsible for understanding the ethical standards, policies and procedures related to our role.

## For employees

Adherence to these standards is a condition of employment. Mass General Brigham considers your actions under these standards to be a significant reflection of your judgment and competence; your knowledge of and compliance with them will constitute an important element of your annual performance evaluation.

## Individuals in non-employee roles

Should be aware that applying the ethical, legal and policy rules in your role is essential to your effectiveness and your continued participation in our organization.

If you are unsure about policies, legal requirements or ethical standards applying to your work, you are expected to ask for the clarification you need. Don't guess if you are unfamiliar with standards or laws—answers and consultation are available to you. Don't ignore your own good judgment about what is right and wrong.

## Special responsibilities of leaders and supervisors

If you supervise others, Mass General Brigham expects that you will both model and teach high ethical standards. You represent our organization to those you lead. If your staff do not see that working with integrity is important to you, it will be difficult for them to believe that ethical standards matter to our organization as a whole. One of your key leadership responsibilities is to inspire those around you to deliver results with integrity. In order to do this you must:

- Help those who report to you understand the legal and ethical standards that apply to their work.
- Model ethical decision-making by explicitly asking: "Is this the right thing to do?" "Did you check this against our standards and policies?"
- Create an open environment to aid and support others so they can raise compliance questions without hesitation.
- Listen carefully and act on the integrity concerns raised by those who report to you.



## Duty to report

Any individual working for or acting on behalf of Mass General Brigham is expected to notice and report any internal problem that violates our standards so it can be corrected. You may not remain silent if you see or know about a problem. This duty to report is both a right and an obligation for all members of our organization. You may choose to report concerns to your local compliance department, Compliance, Audit & Business Integrity, your supervisor or the department you believe can best correct the problem. However, if you have identified a possible instance of wrong doing that could put Mass General Brigham or the reputation of Mass General Brigham at risk, you or your supervisor should always report the issue to your local compliance department or Compliance, Audit & Business Integrity.

## Learn more

- [Policy on Reporting, Investigation and Resolution of Compliance Issues](#)
- [Fraud and Abuse Reporting Policy](#)
- [Mass General Brigham Compliance, Audit & Business Integrity Department](#)
- [Policy Against Discrimination Harassment Sexual Harassment and Retaliation](#)

## Non-retaliation standard

Mass General Brigham understands that individuals sometimes may be reluctant to voice their concerns due to a fear of retaliation. Management action that would deter a reasonable individual from making a report, even if it does not cause the reporter direct economic harm, may constitute retaliation. Whether obvious or subtle, such actions taken against an individual who has raised a good faith concern or cooperated in an investigation will not be tolerated at Mass General Brigham. Not only is it against Mass General Brigham policy to retaliate against those who report concerns, it is also illegal under both state and federal law.

Mass General Brigham has a firm policy prohibiting retaliation of any kind. Any person who violates this policy will be subject to corrective action.

# Compliance, Audit & Business Integrity Department

Mass General Brigham has established a Compliance, Audit & Business Integrity Department to assist all members of our organization with understanding and meeting their ethical, legal and regulatory responsibilities. This department's responsibilities include education, investigation and consultation with all members of the Mass General Brigham community, including management and board leaders.

The Compliance, Audit & Business Integrity Department serves as an independent resource for any members of the Mass General Brigham's community who need to raise concerns or report wrong-doing to the highest levels of our organization. Mass General Brigham chief compliance officer regularly updates senior management and reports to the Mass General Brigham Audit & Compliance Committee to ensure that leaders are aware of ethical and compliance issues. Compliance officers at each Mass General Brigham institution also maintain close communication with their site leadership about these issues.

## How to contact Compliance, Audit & Business Integrity

Mass General Brigham offers both a toll-free telephone service and a web-based reporting option to you for raising ethical, legal or policy concerns or asking questions.

The HelpLine receives many calls each year covering a wide variety of topics and locations across the Mass General Brigham system.

- Reports made using either of these methods are confidential and taken by professionals who do not work at Mass General Brigham.
- You may choose to make a report without giving your name using either method. If you file anonymously, you will be given a callback date and instructions on how to pick up the response to your report. Please be sure to check back; we may need additional detail to conduct an effective investigation of your concern.
- You will be provided with a response with as much detail as is possible.
- All concerns reported to the Compliance HelpLine by phone or online are investigated.



## Mass General Brigham Compliance HelpLine and web-based reporting

1-800-856-1983

[massgeneralbrigham.org/complianceline](https://massgeneralbrigham.org/complianceline)

Reports can be made at any time, 24 hours a day, seven days a week, from any location.

# Employment standards

**Mass General Brigham is committed to fair and respectful treatment of all employees.**

## Equal employment opportunity

Mass General Brigham values the diversity of our workforce. Mass General Brigham supports equal employment opportunity to employees and job applicants. Our workplace must be free from discrimination based on race, color, religious creed, national origin, sex, age, gender identity, disability, sexual orientation, military service, genetic information, and/or other status protected under law.

## Wage and hour standards

Mass General Brigham is committed to paying its employees all compensation they are entitled to receive in compliance with applicable state and federal laws. We have detailed policies about timekeeping and pay practices specifically for non-exempt employees. No employee at Mass General Brigham is permitted to instruct another employee to work "off the clock" (perform work that is not reported through the proper timekeeping systems and paid as working time). Every Mass General Brigham employee is responsible for understanding the policy and reporting policy violations or unresolved timekeeping errors to the Compliance, Audit & Business Integrity Department.

## Learn more

[Human Resources discrimination, harassment and sexual harassment policies](#)

## United Against Racism

United Against Racism is Mass General Brigham's long-term, multi-million-dollar commitment to address the many impacts that racism has on Mass General Brigham patients, employees and the broader community. We believe that systemic racism is a public health threat that impacts our workforce and the communities we serve. Our mission: to dismantle the barriers, systems and actions inside and outside our walls to provide excellent medical care and equity for all.

## Harassment/sexual harassment

Workplace harassment, sexual harassment, comments or other conduct that creates an intimidating or offensive environment will not be tolerated. Mass General Brigham has adopted specific policies with respect to workplace and sexual harassment that provide a way for you to bring such improper conduct to the attention of management.



[Human Resources concern management reporting system](#)

# Creating and preserving records

**Mass General Brigham is committed to creating and preserving accurate and complete business and patient medical records.**

## Creating accurate records

Each of us plays an important role in promoting the creation of accurate business records and patient medical records. Records present in our daily work activity include documents and transactions such as patient medical records, financial statements, expense accounts, vouchers, invoices, time reports, payroll records, reports to government agencies, measurement and performance records...the list of records pertaining to Mass General Brigham is virtually endless. All records must be prepared with care, honesty and accuracy. You must never improperly alter or falsify entries or intentionally omit required information on any Mass General Brigham record or document.

## Preserving records

Federal and state laws and regulations require that Mass General Brigham keep certain documents or data for specified periods of time. Examples include personnel records, patient medical records, government contracts, billing and other financial records. Always follow these legal requirements and the standards in the Mass General Brigham record retention policy, schedule and guidelines. Relevant records may never be destroyed during pending or anticipated litigation, internal investigation or audit. Destruction of records to avoid disclosing them in a legal proceeding may be a criminal offense.

## Learn more

[Mass General Brigham Record Hold Policy](#)

[Mass General Brigham Records and Information Management Policy and Schedule](#)

If you have any questions about your responsibility in retaining Mass General Brigham records, contact the Compliance, Audit & Business Integrity Department or your supervisor.

## Safely destroying records

When you determine that documents or data are permissible to be destroyed, use good judgment in preserving confidentiality. Think before you dispose of any electronic media or devices; old copiers, flash drives, cell phones and other devices could contain information capable of putting our patients or other individuals at risk if disposed of improperly. Never dispose of paper or electronic media containing patient information or other confidential information in the general trash or recycling bins. Use the special locked bins provided for paper and ensure that confidential data on tapes, flash drives and other electronic media is rendered permanently unreadable by following guidance from Mass General Brigham digital security staff before discarding it.



[Information Security & Privacy Office](#)

# Safety and the environment

## Good neighbor practices

Mass General Brigham and our member institutions value our relationship with our neighbors and have achieved a reputation of responsiveness to the interests of our community. Because of the nature of our business, we face particular challenges. Laboratories and research areas work with materials that may present problems if handled or disposed of incorrectly. Clinicians delivering medical and diagnostic care utilize substances that, while vital to successful clinical outcomes, can compromise the environment if we are not scrupulously careful in their use, monitoring, and disposal. State and national agencies have developed standards and rules of practice to protect our air, soil, and water. We all share the responsibility to learn and follow these standards and promptly report any risks we observe.

## Sustainable initiatives

Healthcare today is increasingly aware of its significant environmental footprint. Hospitals are some of the most energy-intensive buildings in the country, consuming large amounts of fuel and water and generating significant waste stream.

Mass General Brigham and our member institutions aspire to lead health care efforts to: promote a healthy environment, optimize the care of our patients and the well-being of our employees, and conserve the resources we expend. Mass General Brigham sustainable initiatives encourages the involvement of all members of the Mass General Brigham community to achieve these goals.

## Workplace safety

Mass General Brigham is equally committed to promoting a safe working environment for our employees and physicians. Each Mass General Brigham employee shares in the responsibility to keep our workplace safe. Employees are provided with information on handling and working with hazardous materials. Mass General Brigham also provides employees with necessary protective equipment and training in its use. It is vital that employees use equipment and materials properly and follow the appropriate procedures to ensure that everything possible is done to avoid compromising the safety of co-workers.

Mass General Brigham recognizes the important role a safe and healthy physical environment plays in promoting human well-being and is committed to the practice of health care that conserves natural resources and is non-polluting.

# Financial standards

## Billing for care

One of the most complex and important functions in our organization is accurate and appropriate billing for services. Mass General Brigham strives to achieve full compliance with all federal and state healthcare program requirements, including the requirement to prepare and submit accurate claims. We are equally committed to following the claims standards of our non-government payers. Billing is a highly complex process. Careful attention from many employees and providers is required at each step, even from individuals who may not always think of themselves as part of the billing process. Wherever you work in Mass General Brigham, it is likely that something you do impacts our ability to bill correctly. It is important to do your part and to raise concerns if you notice a practice that could lead to inaccurate or inappropriate billing.

## Avoiding fraud, waste and abuse

Billions of dollars intended to be spent on health care are lost to fraud, waste and abuse each year. Because Mass General Brigham receives significant government funds from Medicare, Medicaid and other federal and state programs, we have a responsibility to detect, correct and prevent fraud, waste and abuse. We are determined to avoid any practices that could cause federal or state healthcare funds to be misused. Mass General Brigham has multiple mechanisms in place to help prevent, detect and respond to potential fraud, waste or abuse.

## Learn more

[Gift Acceptance Policy](#)

[Policy and Procedures for Employee Business Expenses](#)

Mass General Brigham Finance and Compliance, Audit & Business Integrity work together to develop policies designed to produce claims which accurately reflect the services performed by qualified providers. Education is available for groups with questions about the requirements. Consultation is also available from Mass General Brigham and institution billing compliance staff when new systems or processes are being developed.

## Financial management of donated funds

Donors made the founding of Mass General Brigham hospitals possible some 200 years ago.

Today, Mass General Brigham and its member institutions, as non-profit organizations, are being supported by individual, foundation and corporate donors. We have been entrusted with these funds to achieve our mission of patient care, research, teaching and service to the community. We take our duty to use these funds carefully and to meet our responsibilities to donors very seriously. We adhere to the highest standards in the solicitation, acceptance, recording and use of donated funds. Groups within Mass General Brigham who wish to engage in fundraising activities must first consult with their development office to ensure that all legal and policy requirements are met.

[Fraud and Abuse Reporting Policy](#)

[Statement on Gift Acceptance](#)



Mass General Brigham is committed to acting as a responsible steward of the financial resources we receive to support our mission. We use these resources to accomplish the greatest public good.

# Research

## Authorship

Authorship decisions on all publications must appropriately reflect the degree of contribution of those who conducted the research.

## Data and results integrity

Falsifying or manipulating data or claiming the ideas of others as your own destroy the integrity of both research and researcher. Investigators are obligated to report results accurately regardless of whether the findings support or disprove their hypothesis. Results should be free from bias. This requires, at minimum, that researchers report and account for financial interests that could impair or appear to impair their judgment and impartiality.

## Respectful treatment of subjects

Clinical research should be focused on the patient. It should be based on voluntary consent and trust and should include a full disclosure of relationships and interests. Clinical research must do no harm and should carefully balance the risk of potential future harm and benefits. While research involving animals cannot involve consent, it should reflect similar ethical standards. All Mass General Brigham animal research must be based on the humane treatment of animal subjects, and be conducted in accordance with well-established standards.

## Learn more

[Mass General Brigham Research Navigator](#)

## Laboratory safety

Laboratory safety is critical to the research mission at Mass General Brigham. Researchers must be cognizant of the institutional and regulatory requirements associated with bench research, secure the necessary approvals and foster a culture of lab safety within their groups so that all participants fully understand the risks and hazards of advanced laboratory research.

## Financial management of grants and awards

Research grants and awards require us to use funds only for their intended purpose and to account for their use appropriately. In addition to following Mass General Brigham general financial standards, those involved in research and research administration are required to follow policies and procedures established to ensure accurate reporting of time and effort as well as grant-specific costs.



Ethics and integrity are essential to the advancement of scientific knowledge. Mass General Brigham is committed to conducting research in accordance with the highest professional, ethical and legal standards.



## Patient care standards

### Achieving quality requires integrity

Mass General Brigham and its member institutions are known worldwide for safe, high quality clinical care. Every member of our organization is responsible for doing their utmost to continue and advance our leadership in this area. Quality health care is safe, effective, efficient, equitable, timely, and patient centered based upon the practice of understanding and adhering to our ethical standards. It requires that we bring a high level of ethical decision-making to every action we take on behalf of Mass General Brigham. To provide safe, high quality health care we must ensure that we actively engage our patients and their families in their care, while treating them with kindness, respect and without discrimination. Quality requires everyone doing their job thoughtfully so patients, their families and communities can have confidence that we will uphold the highest standards of personal and institutional conduct.

### Safely and skillfully delivered

Patients must be able to trust that the staff they encounter are well qualified to provide their care. All Mass General Brigham institutions have instituted competency assessments, credentialing requirements, and supervision practices in order to ensure that we are consistently worthy of our patients' trust. It is appropriate that we are closely scrutinized by accrediting organizations and government agencies. All staff members are encouraged to cooperate fully with these standard-assessing bodies as part of our ongoing commitment to continuous quality improvement and to promote transparency with our patients and the public.

### The right care

We must provide the right care at the right time to each patient. This means we must provide only those services necessary for the proper diagnosis and treatment of the patient.

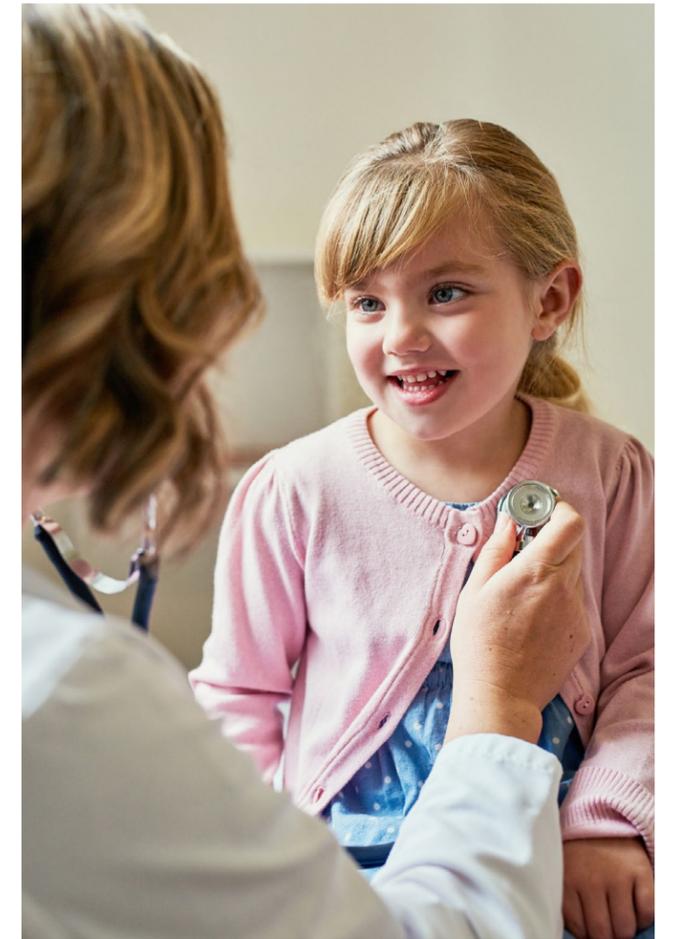
Provide services in the most appropriate setting for the patient. This requires careful assessment of outpatient vs. inpatient, primary care vs. specialty care, and institutional vs. home locations of service. It also requires sensitively considering the particular concerns of patients who may need physical, social, or cultural accommodations in their care.

Help patients with limited financial resources receive the care they need. Patients with an emergency medical condition always have the right to receive screening and care without delay to assess their ability to pay. Beyond this, our hospital financial counseling staff actively works with patients to help them access resources to pay for their ongoing care.

Address all of the patients' needs—medical, behavioral and social—regardless of patients' personal circumstances.

### Learn more

[Mass General Brigham Hospital Credit & Collection Policy](#)  
[Population Health Management](#)



[Mass General Brigham Quality and Safety](#)  
[Financial Assistance and Uninsured Patient Discount Policy](#)

Mass General Brigham is committed to providing the right care, safely, efficiently, and skillfully delivered to all our patients.

# Managing conflicts

**Mass General Brigham is committed to carefully managing relationships with outside individuals and organizations to avoid either real or perceived bias in the conduct of our patient care, research and educational activities.**

## Conflicts of interest

All of us have multiple roles, commitments and interests. When acting in our Mass General Brigham role, it is important to carefully manage situations where our personal interests could conflict or reasonably appear to conflict with the best interests of Mass General Brigham or our patients. A conflict of interest may exist whenever you have an opportunity to use your position at Mass General Brigham for personal gain for yourself, a family member or a friend. A conflict of interest may also exist when an outside interest might inappropriately influence your work decisions. Conflicts do not always have to be eliminated, but they must always be managed to protect the interests of our patients and the reputation of Mass General Brigham.

## Conflicts of commitment

Mass General Brigham recognizes that many individuals who are part of our organization also maintain consulting or other relationships to other organizations. These relationships may be either paid or unpaid. A conflict of commitment exists when these outside ties keep you from devoting appropriate amounts of time, energy, creativity or other personal resources to your Mass General Brigham responsibilities. Mass General Brigham has adopted policies limiting the time and other resources you may devote to outside activities.

## Disclosing potential conflicts

Mass General Brigham's Office for Interactions with Industry (OII) conducts a formal, mandatory conflict of interest disclosure process annually which includes physicians, board members and certain employees. Financial interests and outside activities reported in this process are reviewed by supervisors. Mass General Brigham individuals may be required to make formal disclosures at other times throughout the year. Researchers should be particularly careful to be sure they understand their reporting obligations. Mass General Brigham OII also monitors disclosures against other external and internal sources of information.

Even if you are not required to complete a formal disclosure, you should promptly disclose and discuss any potential conflict of interest or commitment with your supervisor. You may also contact OII or the Compliance, Audit & Business Integrity Department for clarifications and recommendations about how to assess and resolve a potential conflict.



## Gifts

Gifts from individuals or organizations outside Mass General Brigham pose a particular risk of creating actual or apparent conflicts of interest. For this reason, Mass General Brigham has adopted high standards in this area.

### Gifts from vendors

Mass General Brigham has adopted a comprehensive ban on gifts from all vendors. This ban applies to all employees of Mass General Brigham and Mass General Brigham institutions, including all full-time employed physicians and other individuals when they are acting in a Mass General Brigham capacity. Consult with your supervisor if you are not sure if this applies to you.

The definition of gifts prohibited by this standard includes many things vendors are accustomed to offering to their clients or customers; it covers meals, trips, tickets to sporting events, holiday baskets and even items of minimal value such as pens and coffee mugs. In addition to this Mass General Brigham standard, physicians and other prescribers are subject to particularly stringent state and federal requirements concerning acceptance of items or services from pharmaceutical or medical device vendors. Because of the high level of scrutiny attached to relationships with industry, it is essential that you never accept anything from a vendor or a potential vendor unless you have sought and received assurances from your supervisor and/or the Mass General Brigham OII that the item or service does not constitute a gift under our policy or the law. Gifts from industry may violate anti-kickback laws as well as Mass General Brigham policies.

## Learn more

[Mass General Brigham Code of Conduct](#)  
[Mass General Brigham Internet Site Vendor Information pages](#)  
[Mass General Brigham Giving](#)

### Gifts from patients

It is important to avoid any appearance that a different level of care and consideration will be provided to patients who give gifts to their caregivers. All patients deserve the very best care that we can provide. While a thoughtful word or a letter of thanks is the most appropriate expression of appreciation, a professional staff member or other caregiver is allowed to accept modest non-monetary gifts from their patients. If a grateful patient mentions a desire to make a charitable/monetary contribution, refer them to either the system's or a specific affiliate's development office.

### Gifts to or from referral sources

Mass General Brigham and its member institutions may not accept or give anything of value to an individual or organization where one of the purposes of the gift may be to obtain referrals of patients. Referral sources may include providers, hospitals or other health care entities outside Mass General Brigham. Gifts to or from referral sources may be considered kickbacks and may violate both our policies and federal law. Appearance matters; even if these gifts are not a violation of the law, they may carry significant risk to our reputation. Always seek guidance before offering or accepting them.

[Mass General Brigham Policy for Interactions with Industry and Other Outside Entities](#)  
[Mass General Brigham Office for Interactions with Industry](#)

# Public communications

## Speaking for Mass General Brigham

Individuals should not represent themselves as speaking for Mass General Brigham or a Mass General Brigham institution without express permission to do so. Communicating without authority risks misrepresenting our organization as a whole and confusing or even misleading our public community.

### Media contacts

If you receive a request from the media to comment on a matter that involves Mass General Brigham, you should contact the vice president of communications before responding.

### Use of logo and name

Mass General Brigham and each Mass General Brigham institution have developed guidelines on how and when their name and logo may be used; always check these guidelines to be sure any planned use is permitted.

### Public presentations

All presentations on topics related to your work at Mass General Brigham require approval from your supervisor. They must conform to logo and name-use standards as well as to more specific policies governing outside activities.

### Endorsements

It is generally not appropriate to endorse a company's product or service on behalf of Mass General Brigham. In some circumstances, it may be permissible to recommend products or services that Mass General Brigham has used and found successful or participated in developing. These exceptions always require the explicit approval of the Mass General Brigham marketing department as well as the relevant institution's public affairs and/or marketing department.

Mass General Brigham is committed to transparent, truthful, responsive and clear communications with those outside our organization.

## Official communications

Mass General Brigham official communications are designed to inform others about our goals and actions related to our mission of excellence in patient care, research, teaching and service to the community. We are careful to share only fully accurate and non-deceptive information. Departments responsible for representing Mass General Brigham to the public—marketing, government affairs and communications—must meet high standards of transparency and trustworthiness. They can serve as a resource to groups and individuals within Mass General Brigham and should be consulted on achieving these high standards when representing Mass General Brigham in the public arena.

## Political activities and contributions

Federal and state laws restrict the use of corporate assets and govern the activities of non-profit organizations such as Mass General Brigham in connection with elections. Examples of activities that are prohibited include:

- Using employee work time for personal political fundraising;
- using the Mass General Brigham telephone or email system for political solicitations;
- using Mass General Brigham copiers to reproduce material for political campaigns.

Senior management or other designated individuals may participate in legally permitted political activities to fulfill their duties as advocates for Mass General Brigham and our patients.

### Learn more

[Policy and Guidelines for use of the Mass General Brigham Brand and Logo](#)  
[Mass General Brigham Social Media Policy](#)

They may not use Mass General Brigham resources to support any candidate, office holder or political organization. Mass General Brigham advocacy activities must always be conducted in accordance with legal ethical standards regarding lobbying.

## Social media use

### Personal use

You are expected to use good judgment in your personal social media activities. Even private postings on social media sites may constitute a public communication; you should follow Mass General Brigham standards regarding confidentiality, truthfulness and respect for others. If you identify as a Mass General Brigham employee, post about Mass General Brigham or refer to the work of Mass General Brigham or an institution within Mass General Brigham, your communication is governed by all applicable Mass General Brigham policies.

### Official use

Mass General Brigham and all institutions of Mass General Brigham have adopted or are developing authorization processes and guidelines for official social media activities. Sites that present as official pages of Mass General Brigham or a program, institution or initiative of Mass General Brigham, must receive approval prior to going live. Because this is an area where standards continue to evolve to meet new circumstances, you are encouraged to contact the marketing department or the Compliance, Audit & Business Integrity Department for assistance in identifying where to go for necessary approvals.

[Mass General Brigham Code of Conduct](#)  
[Policy and Procedures for Employee Business Expenses](#)

# Safeguarding confidential information

## Protecting patient and health plan member information

Our patients and members entrust us with their personal and medical information so that we can care for them, and provide administrative services associated with their care (e.g. process payment, and conduct internal operations to promote safe and efficient care). We act as responsible stewards of this information and use it carefully to carry out our responsibilities. Patient privacy rules and standards change frequently as new risks are identified. We are committed to protecting our patients' and members' confidentiality in this dynamic environment. You are responsible for learning and staying current on the specific procedures related to your work, but some standards apply no matter your role:

Never divulge patient/member information to any individual who is not authorized to receive that information. This includes casual conversations with your family or friends as well as disclosures at work. Avoid talking about patients/members in public areas such as shuttle buses, elevators or cafeterias. Never share information about patients/members on virtual public platforms such as blogs or social media sites.

Only access patient/member information as required in order to perform your job duties. Only access the minimum necessary information required to accomplish your work. Access of any non-required information is strictly prohibited. You are NOT permitted to access records of friends, co-workers or family members. Contact the appropriate site health information services department if you need to request the health records of others.

When entering into a relationship with a vendor or organization needing access to patient/member information to perform services on behalf of Mass General Brigham, assess how the outside organization will protect our patients'/member confidentiality. A potential vendor's privacy and security practices should be a key element in the vendor selection process. Always obtain an approved business associate agreement before sharing patient/member identifiable data with the vendor or organization. Use good judgment and follow Mass General Brigham policies when you must mail or fax information that could be used to identify patients/members. Always encrypt patient information emailed outside of Mass General Brigham.

## Protecting personal information

You must also protect personal information about patients, health plan members, employees, vendors and others that could put any individual at risk of identity theft. Currently state law identifies an individual's name in conjunction with their Social Security number, their driver's license or state ID number or a financial account number as the elements most likely to cause a risk of identity theft. All of us must safeguard these data elements wherever they are used or stored in our systems. You must promptly report any improper disclosure or loss of this information so we can take required steps to protect the individual at risk. Other data elements such as biometric identifiers, mother's maiden name or other unique identifiers may also create risks for individuals. Mass General Brigham expects all members of our community and all vendors with whom we contract to thoughtfully safeguard any information that could compromise an individual's identity.

Mass General Brigham is committed to protecting the privacy and security of confidential information entrusted to us by our patients, health plan members, employees and other members of our community.

## Proprietary information

You must not share Mass General Brigham proprietary information with outside persons, such as competitors, suppliers or outside contractors unless you have been specifically authorized to do so. Proprietary information includes business strategies, pricing information, financial data, research protocols and intellectual property. This requirement continues to apply even after you leave Mass General Brigham employment or service. You may have similar obligations to prior employers or because of service to other institutions. Mass General Brigham will honor your responsibility to protect that information as well.

## Learn more

[IT Access Control Security Policy](#)

[Safeguarding Fax Copiers Printers Telephone Use and Pagers PH-145](#)

[Minimum Necessary Standard PH-112](#)

[Enterprise IT Asset Management Policy](#)

## Maintaining information security

Mass General Brigham has adopted security standards, policies and procedures to enable us to pursue our patient care, research, teaching and community service mission without disruption. These standards are also essential to protecting confidential information. Security rules include encryption of mobile devices and external email messages, password and access management, guidance on avoiding spam and phishing attempts and many other requirements. Because the risks are constantly changing, these standards will continue to evolve. You are responsible for knowing and following the security rules related to your job.

[For advice on protecting privacy, contact the Mass General Brigham Privacy Office](#)

[For consultation on security requirements, contact your site Information Security Officer](#)

[For information on Business Associate requirements contact Supply Chain or your site Privacy Officer](#)



# Confidential and anonymous reporting

Integrity is at the core of all we do. If you question the appropriateness of a decision or action, contact us:

**Mass General Brigham Compliance HelpLine**  
1-800-856-1983

**Mass General Brigham web-based compliance reporting**  
[massgeneralbrigham.org/complianceline](https://massgeneralbrigham.org/complianceline)

Retaliation for reporting a concern is a violation of Mass General Brigham policy and may violate federal and state laws.

Mass General Brigham Compliance, Audit & Business Integrity | 617-724-1177

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