

Policy: Compliance Code of Conduct Policy and Procedure

Type: Administrative (ADM) / Compliance

Applicable To: Newark Beth Israel Medical Center & Children’s Hospital of New Jersey , RWJBarnabas Health Medical Group, RWJBarnabas Health Corporate Services, Children’s Specialized Hospital, RWJ University Hospital Rahway, RWJ University Hospital Somerset, RWJ University Hospital, Trinitas Regional Medical Center, RWJBarnabas Health Behavioral Health Center, Jersey City Medical Center, RWJ University Hospital Hamilton, Monmouth Medical Center, Clara Maass Medical Center, Community Medical Center, Cooperman Barnabas Medical Center, Monmouth Medical Center, Southern Campus, Saint Barnabas Outpatient Center

Policy Owner: RWJBH Corporate Compliance Department

Effective Date: 8/1/2023

Approved by: Chief Compliance Officer; Vice President Compliance

1. Policy Statement:

RWJBarnabas Health (“RWJBH”) shall maintain a mechanism and timeframe for dissemination of the Compliance Code of Conduct (“Compliance Code”) and related materials, including but not limited to, Compliance Policies and Procedures to all employees, medical staff members, trustees, contractors and all such other parties as required by the Corporate Compliance Department.

The Compliance Code sets forth RWJBH’s standards for ethical conduct and provides guidance for decision-making in the conduct of its business practices.

The Compliance Code establishes the following:

1. RWJBH’s commitment to full compliance with all Federal health care program and State program requirements, including its commitment to prepare and submit accurate claims consistent with such requirements.
2. The requirement that all RWJBH employees, medical staff members, trustees, contractors, and all such other parties as required by the Corporate Compliance Department, when applicable, shall be expected to comply with all Federal health care and State program requirements and with all policies and procedures.
3. The requirement that all RWJBH employees, medical staff members, trustees, contractors, and all such other parties as required by the Corporate Compliance Department when applicable, shall be expected to report to the Compliance Officer or other appropriate individual designated by the facility, suspected violations of any policies and procedures, or

Federal health care program and/or State program requirements, including but not limited to, fraud waste and abuse.

4. The consequences to RWJBH employees, medical staff members, trustees, contractors, and all such other parties as required by the Corporate Compliance Department when applicable, of the failure to comply with Federal health care program and/or State program requirements and/or Compliance Code, and the failure to report such noncompliance; and

5. The right of all individuals to report issues and voice concerns by speaking with a supervisor, the Human Resources Department, or another member of management; a Compliance Officer in the Corporate Compliance Department; or reporting the issue or concern through the Compliance Helpline or Compliance Helpline Web Reporting Site. The Compliance Helpline and Helpline Web Reporting Site are anonymous and confidential avenues for individuals to raise concerns. Individuals who raise compliance concerns will not be subject to retaliation for presenting potential issues in good faith. Confidentiality of the reports will be maintained, as appropriate, and unless otherwise required by law, in order to investigate and resolve the issue.

Adherence to the Compliance Code shall be a condition of employment or doing business within RWJBH. Individuals who fail to meet the standards of conduct explained in the Compliance Code will be subject to discipline, up to and including separation of employment. This includes disciplinary action for retaliation against an individual who reports a violation of the Compliance Code or who cooperates in an investigation or a legal proceeding involving a suspected violation.

All employees and all such other parties as required by the Corporate Compliance Department, are expected to promote, be knowledgeable of and adherent to the Compliance Code, including but not limited to the following:

- Demonstrate knowledge of and follow all policies and regulations applicable to their job or business relationship with RWJBH.
- Support a non-retaliatory environment through actions, words and demeanor.
- Encourage ethical decision-making with others.
- Openly raise compliance issues and concerns in the work setting.
- Meet all Policy, Regulatory and Governmental Payor Program requirements, applicable to their department; follow processes which meet conditions of payment and

conditions of participation in Federal health care programs and/or State programs, and identify and address governmental payment issues at the departmental level.

Employees in a managerial position are expected to have knowledge of and demonstrate competence of the implementation of the Compliance Code and other Compliance Training ensuring all individuals within the manager's supervision complete the Compliance Code of Conduct training and additional specialized training, as required.

Procedure:

1. The Compliance Code including general compliance and fraud, waste and abuse training, shall be provided (either by furnishing hard or electronic copies) to all new employees and to all such other parties as required by the Corporate Compliance Department within ninety (90) days of hire, or effective date of the individual's business relationship with RWJBH. Employees shall be required to sign the Compliance Code Certification acknowledging that they have accessed and read the Compliance Code, and shall abide by the Compliance Code. The signed Compliance Code Certification shall be retained in each individual's electronic human resources file or applicable record keeping for all such other parties, where applicable.
2. Employees shall have access to the Compliance Code via the RWJBH intranet (The Bridge). Non-employed individuals, including but not limited to, contractors and providers with medical staff privileges, are able to access the Compliance Code via the Compliance internet link: <https://compliance.rwjbh.org/Main/Home.aspx>.
3. Employees of RWJBH will receive annual mandatory education training, inclusive of the Compliance Code.

Any performance improvement plans, corrective and/or disciplinary actions issued to employees who fail to complete annual mandatory education training, inclusive of the Compliance Code, will be done in consultation with the employee's supervisor and the Human Resources Department.

4. The Compliance Code shall be updated and revised from time-to-time as determined by the Corporate Compliance Department (e.g., to incorporate non-substantive editorial changes, to address new regulatory guidance or Corporate policies, or to better promote the Compliance Program and adherence to the Compliance Code).

The Corporate Compliance Department shall determine in its reasonable judgment whether to include any such revisions to the Compliance Code.

2. Acronyms:

RWJBH	RWJBarnabas Health https://www.rwjbh.org/
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3. Related Documents:

Document Type	Document Name
Associated Procedures:	<ul style="list-style-type: none"> • Conscientious Employee Protection ACT - CEPA • Employment at Will - policy
Resources:	
Job Aids:	
Regulatory references:	<ul style="list-style-type: none"> • Department of Health and Human Services, Office of Inspector General. OIG Supplemental Compliance Program Guidance for Hospitals, January 2005 https://oig.hhs.gov/fraud/docs/complianceguidance/012705HospSupplementalGuidance.pdf • The New Jersey Conscientious Employee Protection Act “Whistleblower Act” (N.J.S.A 34:19-1) • Medicare Managed Care Manual Chapter 21– Compliance Program Guidelines; (Rev. 110, 01-11-13). Chapter 21. 50.3.1. and 50.3.2. • “Measuring Compliance Program Effectiveness: A Resource Guide”; HCCA-OIG Compliance Effectiveness Roundtable; Issue Date: March 27, 2017. • Department of Health and Human Services, Office of the Inspector General, Publication of the OIG Compliance Program Guidance for Hospitals, 2/1998. http://www.oig.hhs.gov/fraud/complianceguidance.html#1