

COMPLIANCE

It's our commitment

Our commitment – to bring knowledge, responsibility, excellence and integrity every day and in everything we do.

If you suspect any violation of our Code of Conduct or instances of discrimination, harassment or a hostile work environment speak with your supervisor, local Human Resources team, Employee Relations Task Force or Compliance Officer. If you prefer, report your issue through the RWJBarnabas Health Compliance and Discrimination Helpline or through the Helpline online reporting site, 24 hours a day, 7 days a week. Reports can be made anonymously.

RWJBarnabas Health has a non-retaliation policy for all good faith communications of compliance issues or concerns.

RWJBarnabas Health Compliance and Discrimination Helpline

800-780-1140

Call or visit rwjbarnabashealth.ethicspoint.com to report concerns about:

- ▶ Antitrust Issues
- ▶ Coding and Billing
- ▶ Confidentiality
- ▶ Conflicts of Interest
- ▶ Discrimination
- ▶ EMTALA
- ▶ Financial Reporting
- ▶ Fraud, Waste and Abuse
(in a Federal healthcare program such as Medicare or Medicaid)
- ▶ Gifts and Business Courtesies
- ▶ Improper Payments and/or Referrals
- ▶ Patient Relations
- ▶ Political Contributions
- ▶ Retaliation
- ▶ Vendor Relations
- ▶ Workplace Safety



Let's be healthy together.



Our Commitment to Excellence with Integrity

The Compliance Code of Conduct



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Introduction to the Code of Conduct

Since our inception, RWJBarnabas Health has maintained a strong commitment to operating with excellence and integrity in everything we do. We take pride in employing and aligning with the best in our industry. We expect that everyone we work with has the best interest of our patients and our organization in mind at all times. Sometimes, however, figuring out the right decision in a given situation is hard to do.

The purpose of this Code of Conduct is to guide you to the right decision. The Code presents our basic compliance standards and expectations, and is intended to be a day-to-day tool. It will help you tell right from wrong in the workplace and contains practical information and resources to utilize if you are confronted with a potential compliance issue.

Remember, the power of the individual is in the choices he or she makes. When the right choice is not immediately clear to you, turn to the Code of Conduct for direction, or seek help by voicing your concerns. We must all work together to honor the RWJBarnabas Health values and fulfill our mission.



A message from our President and Chief Executive Officer



Dear RWJBarnabas Health Colleague,

I am pleased to introduce our Compliance Code of Conduct. This important document represents our commitment to excellence with integrity as the largest, most comprehensive academic healthcare system in New Jersey.

At RWJBarnabas Health, we are one system, one family, united around our noble mission to make the communities we serve healthier through clinical, academic and social programs. Each of us has chosen to devote our career to healthcare knowing its deep rewards and its complex challenges. We are in the business of taking care of people and our mission of service centers around being kind. Kind to our patients and to each other. Our Code of Conduct honors this choice and acknowledges our dedication to healthcare, and each other.

Our industry is like no other. Nowhere are expectations higher or scrutiny greater. Every day we must make decisions that can withstand this scrutiny, and most importantly, bring the highest quality of care to the individuals and communities we serve. This Code of Conduct helps guide us in achieving our mission-focused goals and reinforces the fundamental message of togetherness – that we, as colleagues, are here to support each other and that there should never be hesitation to reach out for help when you are in doubt, have concerns or need assistance.

Thank you for your commitment and for all you do.

Mark E. Manigan

*President and Chief Executive Officer
RWJBarnabas Health*





Who we are

RWJBarnabas Health is New Jersey's largest integrated health system and its second largest private employer. Our 18,200 employees, 4,600 physicians and 445 residents and interns are united in our mission to deliver the highest quality of care in the best possible environment to over two million patients a year.

The people of RWJBarnabas Health show their dedication to excellence every day by providing compassionate and skilled care with honesty and respect to others. We maintain health care settings which offer the most advanced health care technology to all members of our communities, without regard to color, creed, sex, national origin, sexual orientation, disability or source of payment. Together, we enhance human dignity and the quality of life of those we serve.

OUR MISSION

RWJBarnabas Health's mission is to create and sustain a patient-centered culture of excellence. Our focus on the patient's experience is the catalyst for continual improvement and the basis for providing outstanding care. We are committed to fulfilling our ethical obligation to provide the finest healing environment for our patients and their families, and a positive, fulfilling work environment for our physicians and employees.

OUR VISION

Our vision is to create the industry standard for the highest quality service and patient satisfaction for our patients and their family members, in every encounter.

*“Together, we enhance
human dignity and the
quality of life of those
we serve.”*

“If you are going to achieve excellence in big things, you develop the habit in little matters. Excellence is not an exception, it is a prevailing attitude.” – Colin Powell

About our Commitment

The Code of Conduct defines RWJBarnabas Health’s expectations of ethical conduct and compliance for all employees, as well as those who do business with or on behalf of RWJBarnabas Health, including Trustees, Medical Staff members, vendors and volunteers.

The Code of Conduct is meant as a daily reference guide and it is intended to be easily understood. Since the healthcare environment we live in is so complex, we have summarized concepts and focused on those most relevant to you. This guide is not meant to override any of our other policies or procedures, nor is it intended to function as the final decision-making tool. When in doubt, or when you need more guidance on your concern, you should ask your supervisor or a member of the Compliance Department for assistance.

To maintain high ethical standards and compliance with the law, each of us must act ethically and honestly as individuals; we must inspire our colleagues to *“do the right thing”*; and we must strive each day to help the organization as a whole fulfill its ethical and legal duties. It is only through our greatest resource – people – that we can honor our values and fulfill our mission.

Doing the right thing: a Condition of Employment

The principles found in the Code represent our continued commitment to excellence with integrity, which all members of RWJBarnabas Health are expected to adopt. Since the success of our organization depends on this dedication, adherence to the Code of Conduct is a condition of employment with RWJBarnabas Health.



Our Commitment to Excellence

Striving for consistent execution of our standards for superior service ensures that the care we provide is exceptional – without exception.

Exceptional Communication

By embracing each day with enthusiasm, we will strive to offer our patients and colleagues a kind word, gentle touch or warm smile – simple, yet comforting gestures that mean so much. We consistently seek opportunities to keep patients, families and colleagues informed regarding issues that affect their day.

Compassionate Care

We will provide our patients with compassionate, exceptional care that meets their every need – anticipating, understanding and responding to their concerns with a genuine sense of urgency, energy and caring.

Outstanding Teamwork

We will work alongside our colleagues as a team committed to contributing to the overall well-being of our patients and making a difference in the lives of everyone we touch.

Professional Integrity

Acknowledging that all patients and colleagues are individuals with unique and diverse needs, we will show sensitivity and honesty in establishing trust and respect.

Ownership & Accountability

We will take responsibility for any actions that have an impact on our patients, their families, and our colleagues, and will demonstrate the highest level of professionalism in the performance of our responsibilities.

Our Commitment to Integrity

About the RWJBarnabas Health Compliance Program

The principal objective of RWJBarnabas Health's Compliance Program is to create a culture of compliance by fostering open communication and sound decision-making in matters of industry regulation and business ethics. To accomplish this, the Program strives to be as dynamic as healthcare itself.

A Collective Commitment

The message of compliance starts at the top and the Code applies equally to our boards and senior management. This includes the President and Chief Executive Officer, the hospital Presidents and Chief Executive Officers, System Vice Presidents and other members of senior management.

The Responsibility of Management

Management has the fundamental responsibility for ensuring high ethical standards and actions by all members and affiliates of RWJBarnabas Health. Management is measured on their support in implementing the Code of Conduct, including an assurance that their employees received compliance training and know that they can raise and discuss ethical concerns without fear of retaliation.

Doing the Right Thing

We must always remember that the law represents a minimum standard of behavior. Therefore, it is important to consider the moral principles that govern our conduct and led us to a career in patient care. Ethical decisions allow each of us to make the future better in an environment which presents ethical conflicts every day. The Code helps us recognize and address such concerns.



Our Commitment to Patients

Patient Satisfaction and Quality Care

RWJBarnabas Health continuously aims to improve the quality of health services provided to our patients. We are committed to the delivery of safe, clinically appropriate care

in an environment focused on improving patient safety, the prudent management of resources, compliance with all legal and regulatory requirements and ethical conduct with integrity in all of our transactions and the highest achievable patient satisfaction.

We deliver this care with compassion and kindness, understanding the unique needs of each individual. We protect our patients' rights and preserve their dignity. We comfort our patients and families in times of need and sorrow. We constantly challenge ourselves, expand our competency and seek out new information through education and research. We advocate for our patients in every situation, and treat each patient and family member as if we were caring for our own.

Patients have certain rights when receiving treatment. These rights are provided in written form to our patients, and are extended to all patients, regardless of age, race, religion, national origin, sex, sexual preference, handicap, diagnosis, ability to pay, or source of payment. It is the duty of every member of the RWJBarnabas Health family to help ensure that the following rights, at a minimum, are guaranteed:

Our Patients' Bill of Rights

- A. To receive considerate and respectful care consistent with sound nursing and medical practices;
- B. To be informed of the name of the physician responsible for coordinating his or her care;
- C. To obtain from the physician complete, current information concerning his or her diagnosis, treatment, and prognosis in terms he or she can reasonably be expected to understand;
- D. To receive from the physician information necessary to give informed consent prior to the start of any procedure or treatment;
- E. To refuse treatment to the extent permitted by law and to be informed of the medical consequences of such action;
- F. To privacy to the extent consistent with providing adequate medical care to the patient;
- G. To privacy and confidentiality of all records pertaining to the patient's treatment,

and access to those records, in accordance with HIPAA and state law;

- H. To expect that within its capacity, the hospital will make reasonable response to the patient's request for services, including the services of an interpreter in a language other than English if 10% or more of the population in the hospital's service area speaks that language;
- I. To be informed by the patient's physician of any continuing health care requirements which may follow discharge and to receive assistance from the physician and appropriate hospital staff in arranging for required follow-up care after discharge;
- J. To be informed by the hospital of the necessity of transfer to another facility prior to the transfer and of any alternatives to transfer which may exist;
- K. To be informed, upon request, of other health care and educational institutions that the hospital has authorized to participate in the patient's treatment;
- L. To be advised if the hospital proposes to engage in or perform clinical research and to refuse to participate in research;
- M. To examine and receive an explanation of the patient's bill, regardless of the source of payment, and to receive information or be advised on the availability of sources of financial assistance to help pay for the patient's care, as necessary;
- N. To expect reasonable continuity of care;
- O. To be advised of the hospital rules and regulations that apply to his or her conduct as a patient; and,
- P. To treatment without discrimination as to race, age, religion, sex, national origin, or source of payment.



As a patient-centered organization, RWJBarnabas Health provides many resources to help resolve any conflicts that may arise among patients, their families or their caregivers. If you become aware of such a conflict, refer patients to their Patient Representative, the Patient Satisfaction Department, religious and cultural advisors, bioethics representatives or the medical and clinical professionals involved with their care.

“Don’t bother just to be better than your contemporaries or predecessors. Try to be better than yourself.” – William Faulkner

Emergency Medical Treatment and Labor Act (“EMTALA”)

As part of the RWJBarnabas Health mission to fulfill ethical and legal obligations to our patients and the community, we are committed to providing appropriate emergency medical care to all patients, regardless of their ability to pay. The purpose of the Emergency Medical Treatment and Labor Act is to prevent hospitals from rejecting patients, refusing to treat them, or transferring them to other hospitals because they are unable to pay. In simple terms, EMTALA sets forth provisions that require all patients who present with an emergency medical condition to be examined, and then to be stabilized in the same manner as anyone else presenting with the same symptoms. RWJBarnabas Health’s obligations under EMTALA include, but are not limited to, the following:

1. Providing an appropriate medical screening exam to any individual who comes to a hospital emergency department and requests examination and treatment;
2. Providing necessary stabilizing treatment to an individual with an emergency medical condition (including a woman in labor) anywhere on the hospital’s campus;
3. Providing for an appropriate transfer of the individual if either the individual (or someone acting on the individual’s behalf) requests the transfer or the hospital does not have the capability or capacity to provide the treatment necessary to stabilize the emergency medical condition (or the capability or capacity to admit the individual);

Definitions

Under EMTALA, a medical screening exam is the process required to reach (with clinical confidence) the point at which it can be determined whether an individual has an emergency medical condition. This process begins with triage, which is the process of assessing a patient’s signs and symptoms at the time of arrival to prioritize when the individual should be seen by qualified medical personnel. The medical screening exam, however, goes beyond triage and, depending on the medical condition, may also include a detailed history and physical, as well as diagnostic lab and imaging tests.





4. Not delaying the examination and/or treatment in order to inquire about the individual's insurance status or payment method;
5. Obtaining or attempting to obtain written and informed refusal of examination, treatment or an appropriate transfer in the case of an individual who refuses examination, treatment or transfer;
6. Not taking adverse action against a physician or qualified medical personnel who refuses to transfer an individual with an emergency medical condition, or against an employee who reports a violation of these requirements; and,
7. Accepting appropriate transfers of individuals with emergency medical conditions if the hospital has the specialized capabilities not available at the transferring hospital, and has the capacity to treat those individuals.

EMTALA rules can be complex and difficult to navigate. When in doubt, contact the Compliance Department, the Legal Affairs Department or the Corporate Standards Department if you have questions or concerns about your facility's process.

Americans with Disabilities Act

The Americans with Disabilities Act, the Rehabilitation Act and the New Jersey Law Against Discrimination prohibit discrimination against persons with disabilities in employment and in access to public accommodations. As the largest healthcare system in New Jersey, RWJBarnabas Health is committed to ensuring that appropriate accommodations are made for individuals with disabilities in our facilities. Our Human Resources Department provides reasonable accommodations for employees with disabilities, while our patient representatives and medical staff are trained to identify and assist patients with disabilities, such as patients with a hearing or vision impairment. RWJBarnabas Health does not tolerate the unlawful discrimination of any individual in our facilities. Such allegations against our employees should be reported to Human Resources, while allegations against our consumers should be reported to Patient Care Services immediately.



Preserving Patient Privacy & Security

Our patients trust us with a vast amount of sensitive, personal and confidential information while under our care. Because of the nature of this information, we must protect patient information from inappropriate and unnecessary disclosure. In accordance with the federal Health Insurance Portability and Accountability Act (“HIPAA”) and applicable state medical privacy laws, RWJBarnabas Health is committed to maintaining the confidentiality and security of our patients’ health information.



Protected health information (“PHI”) consists of any information that can identify a patient and relates to their health condition, treatment or payment for healthcare. Therefore, PHI includes a variety of information in written, electronic or oral format, including not only a patient’s medical record, but also information in a patient’s bill or even a mailing list for facility services. Every employee, physician, and volunteer working with RWJBarnabas Health is expected to safeguard PHI by knowing and following our HIPAA Privacy and Security policies. No one may use patient information except as necessary to perform his or her job at RWJBarnabas Health. Additionally, external organizations, such as our vendors, that assist with RWJBarnabas Health with treatment, payment or healthcare operations (known as business associates (“BAs”)), are also required to safeguard the confidentiality and security of PHI.

RWJBarnabas Health has processes in place to protect the security of patient data, but also counts on our employees, physicians and volunteers to exercise care and strictly follow all procedures when they discuss, access or use PHI both within and outside our facilities. HIPAA violations and other inappropriate disclosures of patient information can result in disciplinary actions (including termination) for employees, physicians and/or volunteers, fines and penalties for the System, and even criminal proceedings for egregious violations. Most importantly, the failure to safeguard our patients’ information can break the trust our patients have in the way we provide care.

If you become aware of any unauthorized use, disclosure, loss, theft, breach or suspected breach of any PHI, you must immediately report the improper use, disclosure or breach to your local privacy officer or anonymously through the Compliance and Discrimination HelpLine. If the use or disclosure of PHI constitutes a security breach of information, RWJBarnabas Health must follow all applicable Federal and State breach notification requirements to alert patients and applicable government agencies regarding the breach.

Questions and Answers:

Q: I saw the name of my friend listed on the ICU admission list. Can I go visit her in the ICU?

A: No. While you may have seen your friend's name while you were involved with the treatment, payment or healthcare operations of another patient, you may not use the information for the personal purpose of visitation. Additionally, without your friend's written authorization, you cannot access her medical record information at any time for purposes other than treatment, payment or health care operations.

Q: I saw an interesting case on my unit and I would like to share the information with a colleague from another unit. While my colleague is not involved with the case, can I still share it?

A: You are permitted to share information from the case so long as you do not include any identifying information of the patient you are discussing. While it may be helpful to share details of the case with colleagues for educational purposes, the use of identifying information may violate HIPAA since your colleague is not directly or indirectly involved with the care of the patient.

Tips to help ensure PHI Privacy and Security:

- If you need to use patient information to perform administrative services, you must use only the minimum amount of patient information to perform your job.
- Never discuss patient information in public places or where you can be overheard.
- Keep documents containing PHI locked and secure.
- When faxing PHI, you should call the recipient first to confirm the number and inform them of the incoming fax, and call after the fax was transmitted to ensure that it was appropriately received by the recipient. Only fax PHI in time-sensitive situations.
- Check copy machines and fax machines regularly to ensure that PHI is not exposed.
- Never share your computer system passwords, and do not allow anyone to use your computer while you are logged in.
- Choose passwords that are difficult for others to identify.

“We are what we repeatedly do. Excellence, then, is not an act, but a habit.” – Aristotle

Social Media and You

Social media and networking continue to be a growing force in today's society. With the rise of new media and next generation communications tools and devices, the way in which individuals associated with RWJBarnabas Health can communicate internally and externally continues to expand and evolve. Individuals affiliated with our organization are representatives of RWJBarnabas Health, and it is expected that any social media and networking communications by an employee or affiliate are done in a responsible manner. Please remember:

- Social media activities are not permitted during work hours, and social media sites may not be accessed on any device, company-owned or personal, during work shifts.
- You may not speak, write, or post anything in any electronic messages or on message boards or websites on behalf of RWJBarnabas Health unless previously approved in writing to do so.
- Social media or networking posts may not include any RWJBarnabas Health confidential or proprietary information, including identifiable information or photos of patients, employees or other affiliates.
- Logos or trademarks of the organization may not be used for any personal purposes, including posting or using in any personal use of social media, electronic messages or otherwise.

Our Commitment to Employees

Fair Treatment of Employees and Standards of Workplace Behavior

RWJBarnabas Health strives to create a work environment in which employees have the opportunity to realize their personal career aspirations. We believe in the principle and practice of Equal Employment Opportunity, and we are committed to treating employees fairly.

RWJBarnabas Health intends to comply with Federal, State, and Local laws and regulations prohibiting discrimination on the basis of race, color, ancestry, creed, religion, affectional or sexual orientation, genetic information, atypical hereditary, cellular or blood trait, sex, age, national origin, marital or family status, service in the United States Armed Forces, and disability. This includes non-discrimination in work assignments, employment, placement, promotion, demotion, transfer, recruitment and recruitment advertising, referrals, layoff, recall, termination, training, educational and tuition assistance, social and recreational programs, wages, other forms of compensation



and job requirements. Additionally, this policy extends beyond employees to Board members, physicians, contractors, vendors, patients, patient families, volunteers, and visitors at our facilities.

RWJBarnabas Health will not accept unlawful discrimination of any kind. We expect that our staff members employ the following standards while in our facilities. If these standards are not maintained, please speak with your supervisor or a member of Human Resources or the Compliance Department.

Standards for Employee Behavior in the Workplace:

Standard 1: Whenever interacting with patients/customers, each employee must introduce him/herself by name, title or department when appropriate, and ask if he/she can be of assistance. Each employee must have an ID Badge that is readily visible and legible.

Standard 2: When interacting with patients/customers, be polite, smile and say “hello.” Treat the person as you would want to be treated. Kind words and polite gestures make people feel special.

Standard 3: Use the patient’s formal name and not their first name or endearing “nickname”, etc. without permission from the patient. Your words and tone should show respect and consideration. Make eye contact and extend a few words of concern.

Standard 4: A professional and neat appearance is required to properly represent the institution and to have a positive influence on those we meet. Departmental dress codes must be adhered to at all times.

Standard 5: If asked specific questions by patients/customers and/or peers, employees must make every effort to be as informative as possible whether or not the question pertains to his/her specific job. If unsure of the answer to a question, the employee is expected to ask the help of a fellow employee, supervisor, manager or another department.


Standard 6: Personal conversations in front of patients, physicians and customers are unacceptable. Also, do not use patient waiting areas, nursing stations or elevators for personal conversations or activities.

Standard 7: When speaking by telephone to patients, physicians and customers, the employee needs to be as informative as possible. The volume of the voice needs to be carefully monitored. Shouting is clearly unacceptable. The words and tone should show respect and consideration, and a desire to be of service. Also, remember if the telephone inquiry is about a patient, we only acknowledge the person’s presence in the hospital/facility. In some instances, the Information Desk handles telephone inquiries. Each employee should understand the protocol for handling telephone inquiries in his/her area.

Standard 8: Privacy and confidentiality are to be maintained at all times. When entering a patient room, the employee is required to knock first and state his/her name and the purpose of the visit. All employees are required to conduct themselves professionally and to discuss patient information only in private areas. Employees are not to enter a patient’s room or treat patients without first identifying themselves and explaining what they are going to do.

Standard 9: Each employee is required to interact positively with fellow employees by being polite, and by showing respect and consideration. Each employee should treat people as he/she would want to be treated. When employees help co-workers, they help patients.

Standard 10: Take the initiative. Each employee is expected to pitch in to get tasks done. Listen when patients/customers complain: don’t become defensive, don’t blame others, and don’t make excuses. Anticipate needs, respond quickly and make things right.



“The quality of a person’s life is in direct proportion to their commitment to excellence, regardless of their chosen field or endeavor.” – Vince Lombardi

Maintaining a Safe and Healthy Workplace

The safety of our patients, employees and all members of the RWJBarnabas Health team is a top priority. We must all know and follow our facility’s Safety and Health Standards that apply to our job responsibilities in an effort to maintain a safe environment.

Employees must abide by requirements stated in the Environment of Care Management Plans for each facility. These plans cover the management of Safety, Fire Prevention, Hazardous Materials, Emergency Preparedness, Medical Equipment, Utilities and Security. If an employee feels that a safety concern has not been properly addressed, the concern may be reported to the Corporate Safety Management Department or his/her supervisor.

All employees have the right to report any safety or occupational health problem without being discriminated against or facing reprisals. Safety problems may be reported anonymously through the Corporate Safety Management Department or the Patient Safety Hotline.

In addition to the safety of our physical plant and environment, it is the expectation that RWJBarnabas Health employees, physicians, vendors, volunteers, patients and patient families exercise sound judgment and conduct themselves in a way that does not pose harm to the individuals in our facilities. To that end, please remember:

- Follow the facility’s policy and procedure on properly handling and disposing of medical waste.
- Threatening, aggressive or abusive behavior toward others is not tolerated at any time.
- Weapons of any kind are not permitted on the premises of any RWJBarnabas Health facility, without explicit authorization.
- The use of illegal or unauthorized drugs or the consumption of alcohol is strictly prohibited in the workplace. Reporting to work while under the influence of illegal or unauthorized drugs or alcohol or smelling of alcohol consumption can lead to discipline up to, and including, termination.
- If you handle controlled substances, which are drugs whose manufacturing, possession and use are regulated by the government, you must exercise caution with their distribution and you must know and adhere to the policies and procedures governing these substances.

Our Professional Qualifications

RWJBarnabas Health takes pride in the qualifications of our employees and affiliates. To ensure the best care for our patients, we seek the best individuals to join our organization. We are committed to ensuring that our employees, medical staff and volunteers are honest and trustworthy, and possess the skills and credentials required of their health profession.

RWJBarnabas Health makes reasonable inquiries into the background of all candidates for employment and physicians applying for medical staff privileges, appropriate to the level of responsibility of the position sought by the applicant. This includes conducting a criminal background check for all employees, medical staff and volunteers, as well as consumer credit checks for employees whose position requires the handling of money, receivables and/or valuables. Where specific credentials are required, these will be verified as well.

All employees and medical staff are screened upon hire to ensure that they have not been barred from participating in governmental health care programs and have not appeared on databases as ineligible or otherwise as excluded (e.g., unlicensed or uncertified). The screening process includes checking databases maintained by the United States Department of Health and Human Services' Office of the Inspector General, the United States General Services Administration, as well as various other databases. After hire, all RWJBarnabas Health employees and affiliates are screened against these databases again periodically and on an annual basis.

It is the employee's and physician's ongoing responsibility to remain in compliance with all licensing and/or registration requirements and to immediately report any preliminary or final action that may affect his or her license negatively or eligibility to participate in Federal Health Care Programs.



Wellness and Well-being

RWJBarnabas Health's top priority has always been to provide a high level of quality care. At the same time, helping those around us make healthy choices and prevent disease is the ultimate attainment of our mission. This starts with our employees and affiliates through wellness programs. We are also committed to providing similar services to our communities through outreach and education.



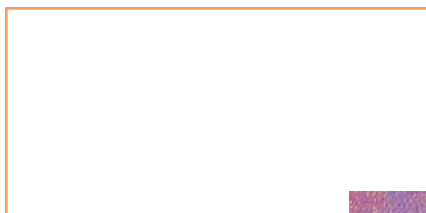


Our Commitment to Physician Alignment

Interactions with Physicians and other Referral Sources

RWJBarnabas Health has financial arrangements with certain physicians and other health care practitioners and providers as part of our effort to develop a comprehensive integrated health system that advances patient satisfaction, quality of care and the interests of the community. RWJBarnabas Health has adopted detailed processes to memorialize our collaborations with physicians and other referral sources to ensure compliance with Federal self-referral and anti-kickback regulations.

To make certain that we are only entering into appropriate and commercially reasonable arrangements with physicians and other referral sources, RWJBarnabas Health requires that all financial transactions with these parties are in writing and signed by the parties, and that payments under these arrangements are set in advance, consistent with fair market value (without regard to the value or volume of referrals or other business generated), and are the product of arms-length negotiations. Under no circumstances does RWJBarnabas Health enter into agreements with the intent to induce or influence referrals from physicians or other referral sources.



Getting Technical

It is important that physicians make decisions regarding the care of their patients and are not improperly influenced by financial considerations. The Federal Government and the State of New Jersey have adopted strict laws and regulations governing financial relationships with physicians and other referral sources. These laws and regulations include the Federal Stark Self-Referral Law and the Federal Anti-Kickback Statute.

What is the Stark Law?

The Federal Physician Self-Referral Law, also known as the Stark Law, prohibits a physician from referring a Medicare patient to another provider for certain health care services if the physician (or immediate family member of the physician) has a financial relationship with the other provider, unless the financial relationship satisfies one or more specifically delineated exceptions. The Stark Law is complex and contains a number of different exceptions, but it is a law of strict liability; parties' intentions are largely irrelevant.

A financial relationship with a physician or the physician's immediate family member can be anything of economic value transferred from a health care provider, like RWJBarnabas Health. This can range from a salary for helping manage a clinical department to providing office space to seeing patients. In these examples, a written, signed agreement with the terms set in advance helps to place the arrangement into a Stark exception.

What is the Anti-Kickback Statute?

The Anti-Kickback Statute prohibits one from knowingly and willfully offering, paying, soliciting, or receiving any remuneration or payments for referring patients or for purchasing or ordering health care items or services reimbursed by Medicare, Medicaid or other Federal health programs. The law is very broad and applies to everyone, not just hospitals and healthcare facilities. Like the Stark Law, the government has issued a number of safe harbor regulations under the Anti-Kickback Statute. A transaction that fits within a safe harbor is deemed lawful under the Anti-Kickback Statute. However, unlike the Stark Law, a party's intent in entering into an arrangement is relevant.

Can physicians receive incidental benefits from RWJBarnabas Health?

Yes. Under the Stark Law and Anti-Kickback Statute, a physician generally may receive an incidental benefit in the course of an activity that facilitates, promotes or relates to RWJBarnabas Health legitimate business operations, so long as the benefit does not take into account the value or volume of the physician's referrals to the organization. An example of this could include a physician receiving a modest lunch in the physician's lounge while the physician is at the hospital rounding on patients. Other benefits and business courtesies that are commonly provided to other staff members also can be provided to physicians, so long as the value of the benefit is tracked and the total benefits provided to the physician remains under an annual limit set by the Federal Government.



“Be a yardstick of quality. Some people aren’t used to an environment where excellence is expected.” – Steve Jobs

Strategic Alignments for the Community Good

As part of the RWJBarnabas Health mission, we are consistently focused on providing the finest healing environment for our patients. However, our commitment to our patients extends far before a patient enters our doors. As a healthcare organization with a patient-centered value system, RWJBarnabas Health seeks to promote the continuity of care for our current and future patients. To that end, we are resolved to maintain strategic alignments with healthcare providers in the community. It is our goal to create a system of information exchange and care planning that can improve the wellness of our patients and the community as a whole.

Our Commitment to Compliance with Federal & State Laws and Regulations

The Deficit Reduction Act

The prevention and enforcement of healthcare fraud, waste and abuse remains a top priority for the Federal Government. Section 6032 of the Federal Deficit Reduction Act of 2005 (“DRA”) requires healthcare organizations such as RWJBarnabas Health to notify their employees and affiliates of important Federal and State anti-fraud regulations.

In an effort to comply with the DRA, RWJBarnabas Health issues a DRA notice on an annual basis to all governing Board members, employees, management, physicians, contractors and agents from all RWJBarnabas Health facilities. The notice describes the general provisions of certain false claims statutes and whistleblower protection laws. These laws include the Federal False Claims Act and whistleblower protection provisions of the False Claims Act, the Program Fraud Civil Remedies Act, the New Jersey False Claims Act, the New Jersey Insurance Fraud Prevention Act, the New Jersey Medical Assistance and Health Services Act, and the New Jersey Conscientious Employee Protection Act.

Employees, physicians, trustees, volunteers and other affiliates of RWJBarnabas Health are required to comply with the provisions of the DRA and all government anti-fraud laws and regulations. Please speak with your manager or the Compliance Department if you have questions related to this requirement.

The False Claims Act

RWJBarnabas Health is committed to honest and ethical interactions with all health care payers. Federal health care programs, such as Medicare, Medicaid and TRICARE, are the largest source of reimbursement to the organization, so it is critical that the bills that

we submit to government programs are accurate and complete. The Federal False Claims Act (“FCA”) is the principal statute that the Federal Government relies upon to enforce health care fraud matters. The FCA prohibits providers from ‘knowingly’ submitting false or fraudulent claims to the government. In addition, the FCA requires providers to disclose and return overpayments by the later of: (A) the date which is 60 days after the date on which the overpayment was identified; or (B) the date any corresponding cost report is due, if applicable.


Knowingly submitting a claim for a Medicare patient that does not properly reflect the services provided can constitute a violation of the FCA. Because of the complex nature of billing and coding healthcare claims, it is important that all individuals involved with the process are familiar with the coding and billing requirements relating to their job activities. RWJBarnabas Health prohibits knowingly submitting claims for payment that are false or fraudulent. Furthermore, RWJBarnabas Health is committed to disclosing and refunding overpayments from Federal Health Care programs within 60 days of identifying the overpayment.

If you are concerned that claims are not being submitted properly, or are concerned that an identified overpayment received from a Federal Health Care Program has not been disclosed or refunded, speak with your supervisor or the Compliance Department.



Questions and Answers:

- Q:** What does ‘knowingly’ mean?
- A:** The FCA defines the term knowingly to mean any person who has actual knowledge of the falsity of the claim, acts in deliberate ignorance of the truth or falsity of the claim, or acts in reckless disregard of the truth or falsity of the claim.
- Q:** What can I do to make sure I comply with the FCA?
- Q:** You should know the billing and coding requirements relating to your job activities. You should also make sure that the documentation in the medical record supports the coding and billing for each claim and that all entries on hospital cost reports are accurate. Individuals not involved in the claim or cost report submission process can help RWJBarnabas Health maintain compliance with applicable laws, rules and regulations by always documenting accurately and completely all services that are provided in the applicable medical record and ensuring that all information that is provided to those responsible for preparing hospital cost reports is accurate and complete. If you feel that you do not understand the billing, coding or documentation requirements relating to your job activities, speak with your supervisor or the Compliance Department.



“All labor that uplifts humanity has dignity and importance and should be undertaken with painstaking excellence.”
— Dr. Martin Luther King, Jr.

Documentation

The medical record chronicles a patient's experience in our facilities. In addition to serving as the basis for reimbursement of services provided, the medical record is a crucial tool to memorialize the chronology and outcomes of a patient's care. RWJBarnabas Health is committed to maintaining complete and accurate medical records through clear and comprehensive documentation.

To achieve this objective, RWJBarnabas Health has implemented an electronic medical record. This will allow for improved collection and tracking of data related to the patient's care. The technological transformation to an electronic medical record confirms our commitment to efficiently collecting and analyzing patient information. This new system, however, requires the manual input of complete and accurate documentation from our clinical and medical staff.

Keep the following tips in mind when documenting in a patient's medical record:

- In order to bill for a service, it is important always to document what services need to be provided to the patient (the intensity of the service) and why the patient needs those particular services (the severity of the patient's illness).
- Always paint the complete picture of the patient's signs, symptoms and medical history.
- Services ordered for a patient should be documented clearly in the medical record.
- Verbal orders are to be authenticated in writing within 48 hours by the individual originating the order.
- Orders and progress notes must be dated, timed and authenticated by the originator.
- A medical record is considered complete when it contains sufficient information to identify the patient; support the diagnosis/condition; justify the care, treatment, and services; document the course and results of care, treatment, and services; and promote continuity of care among providers.



Coding and Billing

RWJBarnabas Health is committed to maintaining the integrity and quality of patient data through accurate coding and billing. We rely on our coding professionals to translate the documentation in a patient's medical record into a format that allows for appropriate billing and reimbursement.

We may only seek reimbursement for services that were actually rendered, properly documented and coded and billed correctly.

Our coding teams can only assign and report codes that are properly supported by physician documentation. No one may make coding assumptions when language is not sufficiently clear, and no one may include or exclude a code because of the effect on payment or coverage.

When a claim is submitted for payment by RWJBarnabas Health, we must certify that the claim is accurate and complete. Therefore, it is the responsibility of all individuals involved with the coding and billing process to understand the claim creation process and the rules associated with correct submission. We may only submit claims for services that are reasonable and necessary for the patient's care.

It is your responsibility to be familiar with the appropriate coding and billing rules and practices of your relevant area of operations. If you have questions or concerns regarding the coding and/or billing process, please contact your supervisor or the Compliance Department.

Government Investigations

As a result of the increased scrutiny on health care practices nationally, RWJBarnabas Health, like all other health care providers, must be prepared to respond to government investigations. It is the policy of RWJBarnabas Health that all employees and affiliates respond to government investigations with honesty, integrity and in a cooperative manner.

If a person identifying himself or herself as a government investigator approaches you, requests documents from you or presents you with a subpoena or search warrant, notify the


Compliance Department or the Legal Affairs Department immediately. These departments will assist in verifying the credentials of the investigator and following proper procedures for cooperating with the investigation. Do not discard or alter any RWJBarnabas Health document or record if you anticipate, or are aware of, a request by the government, an outside agency or court, that would cover the document or record. Any requests for information from a Federal Health Care Program (such as Medicare or Medicaid) should be forwarded to the Health Information Management Department or the Compliance Department, depending on whether or not the request is routine.

Remember

While employees are not prohibited from speaking to an investigator, you also are under no obligation to speak to an investigator. If you do choose to speak with an investigator, do not lie or make false or misleading statements or attempt to persuade others to lie or make false or misleading statements. You may opt to end the conversation at any time.

Retention of Records

RWJBarnabas Health maintains retention policies for different types of documentation, including but not limited to medical record documentation, personnel files, payroll and tax forms, and documentation related to risk management, legal and compliance issues. Employees and affiliates of RWJBarnabas Health may not violate the retention policies in place for any documents, particularly those related to an investigation by a patient, third party or the government or specific hold orders issued by the Compliance Department or Legal Affairs. You may not alter or destroy records in an effort to cover up omissions or errors. Contact your supervisor or Legal Affairs if you have a question about document retention.



“Formulate and stamp indelibly on your mind a mental picture of yourself as succeeding. Hold this picture tenaciously. Never permit it to fade. Your mind will seek to develop the picture.”
— Norman Vincent Peale

Our Commitment to Independence

Conflicts of Interest

RWJBarnabas Health is committed to ensuring that staff members do not engage in activities that involve a conflict, or a perceived conflict, between their system duties and their personal interest. As conflicts of interest can arise in many different types of business transactions, it is important for all employees and affiliates of RWJBarnabas Health to act with integrity in all business dealings.

If a potential conflict arises, the employee or affiliate involved must document the details of the potential conflict and provide it to the Compliance Department. The individual may not proceed with the potential conflict without prior approval.

Examples of Potential Conflicts

- A financial interest in a vendor who does business with RWJBarnabas Health.
- Receiving a gift from an entity or individual that could be viewed as trying to influence a decision on behalf of RWJBarnabas Health.
- Membership on the governing board of a company that does business with RWJBarnabas Health.
- A department manager hiring a family member into the department.

Gifts and Business Courtesies

Patients and family members sometimes offer gifts to show gratitude for the care we provide. Because providing high quality care is an integral part of the mission of our organization, it is the policy of RWJBarnabas Health to prohibit the acceptance of unapproved gifts, cash or reimbursements from patients or third parties.

1. Employees and affiliates may not accept cash gifts from a patient or patient's family member, or anyone else; donors should be directed to the RWJBarnabas Health Foundation.
2. Employees and affiliates may accept occasional and unsolicited gifts offered as a recognized gesture of appreciation or during the holiday season (such as gifts of flowers or candy) if the value of the gift is under \$50.00. Frequent gifts from a specific individual or entity should be reported to a supervisor or the Compliance Department.
3. Under no circumstances may an employee or affiliate solicit gifts from patients, vendors or anyone else.
4. Questions related to an item received should be directed to your supervisor or the Compliance Department.

At times, vendors or other third parties may offer to reimburse education or training programs for our employees. While these opportunities present benefits for our employees and affiliates, we may not accept any support that could create an appearance of impropriety. RWJBarnabas Health prohibits the receipt of business courtesies that could create an appearance of impropriety or that could affect the decision-making of our employees and affiliates. Before accepting a business courtesy, approval must be obtained in advance from Senior Management.

Vendor Relations

RWJBarnabas Health employees and affiliates shall interact with vendors, suppliers and subcontractors in a manner that meets ethical standards, protects patient confidentiality, does not interfere with the process of patient care, and encourages the appropriate, efficient and cost-effective use of products and services. We are fair and open in our dealings with vendors, and we only enter into contracts with these third parties based on objective business criteria. All employees must avoid any interaction with a vendor that could create a conflict of interest or even an appearance of impropriety.

It is the policy of RWJBarnabas Health to prohibit knowingly entering into contracts with third parties that have been excluded from participation



in any government programs. If a vendor, supplier or subcontractor becomes excluded from Federal Health Care Programs while under a contract or agreement with our organization, the contract or relationship shall be terminated immediately. For third parties that may have access to protected health information, a business associate agreement is signed to ensure information privacy and security provisions are upheld in all business dealings.

Vendors, suppliers and subcontractors are not permitted to access areas of our facilities or solicit members of RWJBarnabas Health without authorization. RWJBarnabas Health maintains facility-specific policies and procedures regarding vendor relationships. Questions or concerns about a vendor's interactions with RWJBarnabas Health employees or affiliates can be addressed to your supervisor or the Compliance Department.



“Excellence is the gradual result of always striving to do better.” – Pat Riley

Political Contributions

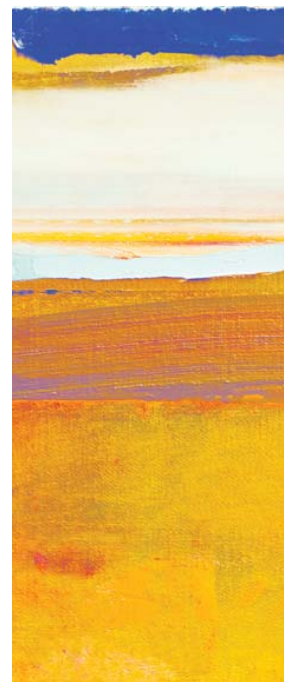
As a tax-exempt organization with a not-for-profit business standing, members of RWJBarnabas Health must remain unbiased and objective during political campaigns and elections. Employees and affiliates of RWJBarnabas Health are not permitted to participate or intervene in political campaigns on behalf of (or in opposition to) any candidate for public office in the capacity of their position with the organization. Speak with your supervisor or call the Compliance Department if you have questions about your individual participation or funding of a political campaign.

Dos:

- You are permitted to contribute personal funds to the candidacy of a public official, subject to applicable law.
- You are free to be involved in the democratic process during your personal time or your time away from work, so long as you are speaking for yourself as an individual and are not presenting yourself as a representative of RWJBarnabas Health.

Don'ts:

- You may not receive reimbursement for contributions to political activities from RWJBarnabas Health.
- You may not use RWJBarnabas Health resources, property or facilities for any political activities.
- You may not use RWJBarnabas Health funds to contribute to a political campaign or election in any way.



Our Commitment to Advancements in Medicine & the Community

Teaching in our Hospitals

Medical education programs can contribute to the delivery of high-quality, cutting-edge, cost-effective, and integrated medical care. With a reputation of attracting the best clinical minds and keeping abreast of advances in medical science, RWJBarnabas Health is proud to participate in the education of our future clinical leadership. The medical education programs within RWJBarnabas Health include those for undergraduates and graduate medical education, continuing medical education and allied health professions education.

As part of our role as a teaching organization, RWJBarnabas Health is committed to maintaining appropriate supervision at all times for physicians in training, as required by the Centers for Medicare and Medicaid Services. Additionally, RWJBarnabas Health adheres to Medicare's Cost Reporting guidelines for the calculation of Graduate Medical Education and Indirect Medical Education costs.

Research Initiatives

As a leader in the healthcare industry, RWJBarnabas Health seeks to contribute to new knowledge in healthcare through clinical research. Our support of research initiatives undertaken by our employees and medical staff reinforces and promotes our mission to remain a healthcare leader.

RWJBarnabas Health is committed to performing research in compliance with applicable law and ethical principles. Clinical trials are approved by the facility's Institutional Review Board prior to the recruitment of patients, and informed consent is obtained, as required, from all participants or subjects prior to the initiation of research activities. Individuals involved in performing research activities must receive training on ethical research practices, scientific integrity and misconduct, and other research compliance

matters as appropriate. RWJBarnabas Health is committed to assuring that research billing is accurate and in compliance with applicable law.

Contact the Compliance Department with any questions related to our research compliance practices.

Antitrust Compliance

RWJBarnabas Health is committed to healthy competition based on the exceptional quality of care and services we provide our patients. Federal and state antitrust laws are designed to help promote competition and create a 'level playing field' in the marketplace. RWJBarnabas Health competes with other healthcare organizations in the areas we serve, and we support antitrust practices that promote consumer welfare.

RWJBarnabas Health prohibits engaging in unfair or inappropriate anti-competitive practices, such as price fixing or exchanging price information with competitors, and agreements with competitors to divide customers or geographic markets.


Sometimes, determining whether conduct violates the antitrust laws requires a detailed analysis of all the relevant facts and circumstances. If you are unsure whether a particular activity raises antitrust issues, discuss it with your supervisor or a member of the Compliance Department or Legal Affairs Department.

Question:

I am developing a new outpatient program at my hospital, and I would like to call my friend at a nearby hospital to find out where she is advertising her program so that I may market in other areas. Can I do that?

Answer:

No, you may not discuss advertising techniques with your friend, as it may appear that you are attempting to divide customers or geographic markets.



“The secret of joy in work is contained in one word - excellence. To know how to do something well is to enjoy it.”
— Pearl S. Buck

Marketing Activities

RWJBarnabas Health uses advertising, marketing and fundraising activities to inform the communities we serve about the healthcare services available to them and the quality care we provide. We also use advertising and marketing to educate the public about current healthcare trends and other information to promote wellness in the community. Our marketing and advertising efforts represent truthful information that accurately reflects the services available and the level of certification or accreditation achieved by our facilities.

Tax-Exempt Status

RWJBarnabas Health and many of our affiliates are not-for-profit organizations that have been granted tax exempt status by the Internal Revenue Service (“IRS”) based upon our charitable health care mission. Maintaining this status is critical and the use of RWJBarnabas Health tax exempt assets and revenues must meet all applicable IRS requirements. For instance, we must not engage in activities that inappropriately benefit private organizations or individuals, including employees. If a private benefit is more than incidental, it may jeopardize the organization’s tax exempt status. This restriction is to ensure that a tax-exempt organization serves a public interest, not a private one. For Hospitals, the IRS requires healthcare organizations with a tax-exempt status to provide annually certain information on financial assistance and community benefit as well as information on billing and collections, charges for medical care and policy relating to emergency medical care. RWJBarnabas Health is committed to carrying out our mission of maintaining a strong, patient-centered, high quality healthcare system that is responsive to the needs of our communities.

Our Responsibility to the Environment

As a community-centered organization focused on the wellness of our constituents, RWJBarnabas Health is committed to acting in an environmentally responsible manner. In addition to the thorough disposal procedures for hazardous waste materials, RWJBarnabas Health is working toward improvements in our operations that help preserve our resources for future generations.

RWJBarnabas Health has implemented several sizable energy efficiency projects to reduce fuel consumption and emissions into the atmosphere. RWJBarnabas Health prides itself on being an environmentally responsible consumer of the earth’s resources and explores every feasible/practical approach to confirm if it bears merit for consideration and implementation.

Living the Commitment

Resources & References

The purpose of the RWJBarnabas Health Code of Conduct is to serve as a guide that will help you navigate through difficult ethical decisions. These are questions that arise every day in our business. We strive for excellence in everything we do, but we are committed to achieving that excellence through the highest level of integrity. The RWJBarnabas Health Compliance Program is available to help you determine the best course of action in complicated situations.

The RWJBarnabas Health Compliance Program has received the full support of senior management and the Board of Trustees, and is a resource for any individual affiliated with RWJBarnabas Health. With a staff of dedicated compliance professionals that are well-versed in healthcare laws, regulations and policies, the RWJBarnabas Health compliance team is available to discuss compliance concerns with you. In addition, we provide training and education on general compliance issues as well as risk-specific topics, as necessary. We conduct auditing and monitoring activities to identify and resolve issues. Finally, we work to promote the culture of compliance and integrity throughout the workplace. If you have a compliance concern, do not hesitate to contact your Local Compliance Officer.

A Note on Non-Retaliation

RWJBarnabas Health is committed to operating with honesty and integrity in all aspects of our business. The rules under which we must abide can be complex and difficult to understand. It is natural for questions to arise and issues to be identified. In compliance with the Federal False Claims Act and the New Jersey Conscientious Employee Protection Act, individuals who report compliance issues in good faith will not be subject to retaliation.

What is retaliation?

Retaliation can be any adverse act undertaken as a result of an employee exercising a protected right.

What does it mean to report an issue in good faith?

When you report an issue in good faith, it means that you are telling the truth as you know it.

What should I do if I believe I am being retaliated against?

If you believe a retaliatory action has taken place as a result of you reporting an issue in good faith, please contact the Compliance Department immediately.





Applying the Commitment Everyday

It is not always easy to make the right decision when confronted with a sensitive issue. To help maintain a culture of integrity, we encourage all individuals to report issues as soon as they are identified, so that we may work to review and resolve the details and promote a culture of ethical behavior.

When you are confronted with a situation that does not feel right or makes it difficult to comfortably proceed down a path of integrity, we urge you to voice your concerns. There are three ways to act:

1. Speak with your supervisor, the Human Resources Department, or another member of management about your concern.
2. Speak with an individual in the Compliance Department.
3. Report the issue through the Compliance and Discrimination HelpLine.

The Compliance and Discrimination HelpLine is an anonymous and confidential avenue for you to raise concerns. It is available 24 hours a day, seven days a week and is maintained by an outside vendor, to protect your privacy. RWJBarnabas Health offers this anonymous reporting option because it is crucially important to us to identify and work to resolve all compliance-related concerns, regardless of the identity of the individuals raising the issue. Any RWJBarnabas Health employee, physician, contract worker, patient, vendor or interested member of the community may call the HelpLine to ask questions concerning ethical or legal conduct, to raise a concern, or to report any potentially improper action.

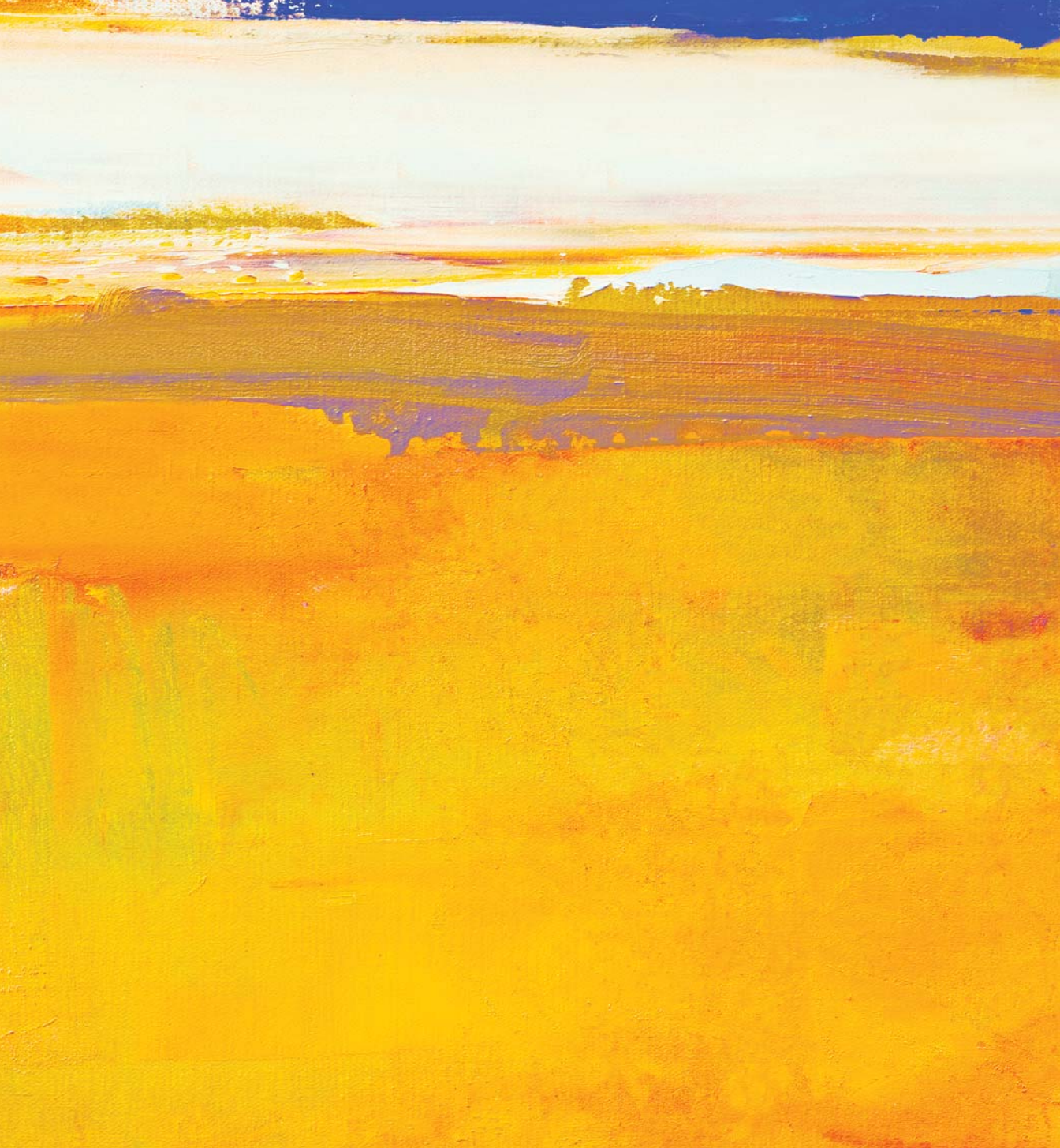
The Compliance and Discrimination HelpLine number is 1.800.780.1140.

When you report a potential violation of the Code of Conduct through the HelpLine or otherwise, the Compliance Department will ensure that an appropriate investigation is conducted. We maintain confidentiality of these reports, and unless otherwise required by law, only inform those who need to know to help review, investigate or assist with the resolution of these matters. Individuals who raise compliance concerns will not be subject to retaliation for presenting potential issues in good faith.

RWJBarnabas Health strives to excel in everything we do and provide the best possible service to our communities. We cannot succeed in our mission and vision without a strong culture of integrity and ethical decision making. We rely on each individual that is affiliated with RWJBarnabas Health to make ethical choices and do what is right each time and ask for assistance when in doubt.

Acknowledging the Commitment

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.



Compliance and Discrimination HelpLine: 1.800.780.1140

RWJBarnabas
HEALTH

RWJBarnabas Health Compliance Department

Code of Conduct

General Compliance Training Certification

I acknowledge that I have received and read the RWJBarnabas Health Compliance Code of Conduct, understand its contents and agree to abide by it.

I have also completed the Code of Conduct General Compliance Training in its entirety.

Name

Signature

Facility

Department

Date
