

# CODE of BUSINESS CONDUCT & ETHICS



## *A Message from Leadership*

Dear Colleague,

Enclosed is CarePoint Health's (Bayonne Medical Center, Christ Hospital, Hoboken University Medical Center, CarePoint Health Management Service Organization, CarePoint Health Medical Group, Garden State Healthcare Associates, McCabe Ambulance, and Quality Care Associates) Code of Business Conduct and Ethics. This Code of Conduct supports our mission, vision and value statements: to provide the highest quality service and commitment to our patients and their families. The Code is a key part of CarePoint Health's Compliance Program, which is a permanent part of the organization's infrastructure. Its purpose is to enhance our environment of fairness, sound judgment and mutual respect and to assure that CarePoint Health operations are conducted in compliance with the appropriate CarePoint Health Entity's policies and procedures and all applicable Federal and State laws and regulations. In other words, this Code provides guidance to all CarePoint Health employees in assisting us with carrying out our daily activities. Although many policies and procedures have been developed to guide CarePoint Health employees' behavior and protect them against unlawful and unethical activities, it is important to emphasize that the Code does not replace such policies, but simply enhances them.

CarePoint Health's Compliance Program, which was developed in 2013, can only succeed with the commitment and participation of everyone associated with the organization. The Compliance Program was developed to identify issues, prevent or remedy problems and give all CarePoint Health's employees another channel to voice their concerns. All employees will receive training on the Compliance Program, Code of Conduct and related policies upon orientation and annually. It is important that you read and understand the Code and its relevant policies and procedures.

We encourage you to bring to management's attention potential violations of CarePoint Health's policies and/or government laws. To voice your concerns, contact your Manager, Vice President, Vice President of Corporate Compliance. If you wish to remain anonymous you can call the confidential Compliance Hotline number listed below.

Bayonne Medical Center  
Christ Hospital  
Hoboken University Medical Center  
CarePoint Health Medical Group  
Garden State Healthcare Associates  
CarePoint Health Management Service Organization  
Quality Care Associates  
McCabe Ambulance

VP, Corporate Compliance & Internal Audit  
[CcomplianceOfficer@carepointhealth.org](mailto:CcomplianceOfficer@carepointhealth.org)  
Hotline: 844.246.4365

You have our personal assurance that no retaliatory action will ever be taken against you for asking a question or raising a concern in good faith about the Code of Conduct or unethical behavior. Because of our Compliance Program, the Code of Conduct, your commitment, dedication and integrity, CarePoint Health will continue to maintain the trust on which the fulfillment of its mission, values and vision depends.

Thank you for your support of this most important program and document.

Sincerely,

Executive Management Team

# CODE of BUSINESS CONDUCT and ETHICS

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## Mission

Treating with compassion and leading with innovation, we improve the health of the communities we serve.

## Vision

CarePoint Health will be recognized for pioneering the future of health care in New Jersey. We will reinvent health care by innovating at every opportunity, challenging convention, and building sustainable models for the patient, communities and health care providers.

## Core Values

**Patient-Centered.** *We put the patient first.* The patient is the center of everything that we do, and we will provide every patient with exceptional care and service that is delivered with dignity and compassion.

**Innovation.** *Innovation is a way of life.* From the coordination of care to advanced technologies, we seek out and embrace new, meaningful ways of delivering care.

**Coordinated Care.** *Personalized coordinated care.* As an integrated health system, we align our physicians, clinics, hospitals and affiliated services to provide the most effective and efficient care possible.

**Sustainability.** *Financial health to reinvest in the future.* Achieving financial health allows us to invest in the best people, at the best facilities, utilizing the latest technologies to provide the first-class care now and tomorrow.

**Community Impact.** *We take care of Hudson County.* We work to create positive outcomes by investing both financial resources and human resources to organizations that are equally committed to the health and vitality of the communities we serve.

## **PATIENT RELATIONS**

### Quality of Care

CarePoint Health as a whole is committed to providing quality healthcare to our patients and, as such, CarePoint Health treats all patients with respect and dignity and provides care that is both necessary and appropriate. We make no distinction in the admission, transfer or discharge of patients or in the care we provide based on race, color, religion or national origin. Clinical care is based on identified patient needs and only competent and qualified individuals will provide this care, while always considering the safety and well-being of our patients.

### EMTALA

CarePoint Health Hospitals and Medical Centers follows the Emergency Medical Treatment and Active Labor Act (“EMTALA”) in providing an emergency medical screening examination and necessary stabilization to all patients, regardless of ability to pay or the source of their payment. Provided that CarePoint Health Hospitals and Medical Centers has the capacity and capability, anyone with an emergency medical condition is treated. In an emergency situation, or if the patient is in labor, we will not delay the medical screening and necessary stabilizing treatment in order to seek financial and demographic information. Patients with emergency medical conditions are only transferred to another facility at the patient’s request or if the patient’s medical needs cannot be met and appropriate care is knowingly available at another facility. If this occurs, the patient will be transferred in strict compliance with the State and Federal EMTALA regulatory requirements.

### Patient Rights

CarePoint Health listens to and follows the choices made by our patients with respect to their clinical care. Each patient is provided with a written statement of patient rights and information regarding our privacy practices. CarePoint Health respects patients’ rights with respect to treatment and medical services without discrimination based on race, age, religion, national origin, sex, sexual preferences, handicap, diagnosis, ability to pay, or source of payment, and to make decisions regarding their medical care, establishing their advance directives and the freedom to choose physicians and other service providers.

## **BUSINESS AND FINANCIAL REPORTING**

### Billing for Services

CarePoint Health is committed to ethical, honest billing practices and, accordingly, CarePoint Health has implemented policies, procedures and systems to facilitate accurate billing to government payers, commercial insurance payers, and patients. All policies, procedures and systems conform to Federal and State laws and regulations. CarePoint Health will not tolerate any deliberately false or inaccurate submission of bills. Any employee who knowingly submits a false claim, or provides information that may contribute to submitting a false claim such as falsified clinical documentation, is subject to dismissal. CarePoint Health will invoice patients or third parties only for services provided and will provide assistance to those seeking to understand the costs of their care. CarePoint Health Centers will also attempt to resolve billing questions and objections to the satisfaction of the patient.

In support of accurate billing, medical records must provide reliable documentation of the services rendered. It is important that all individuals who contribute to medical records provide accurate information and do not destroy any information considered as part of the official medical record.

Accurate and timely documentation also depends on the diligence and attention of physicians who treat patients at CarePoint Health. Each physician must provide us with complete, legible and accurate information in a timely manner. All CarePoint Health employees involved in billing and coding are expected to be knowledgeable in all aspects of current laws and regulations affecting their duties. CarePoint Health will ensure annual training of applicable staff members, clinicians, coders and billers on proper coding, charge capture and billing.

### Errors and Corrective Action

We bill only for medically appropriate services actually performed by properly licensed individuals. We do not submit duplicate bills. If billing errors or billing requirement violations come to light, appropriate corrective action is taken, including refunding any overpayment.

### Coding

CarePoint Health will continue to make every attempt to code all medical records completely and accurately using the proper LCD, ICD-10, CPT-4 and/or HCPCS codes reflective of the treatment and diagnostic documentation written in the medical record by a physician or designee.

In the event a billing error is discovered, immediate action will be taken to correct the error, alert the payer and promptly refund any payments not due to CarePoint Health.

### Cost Reports

Compliance with all Federal and State laws, regulations and guidelines relating to CarePoint Health's cost report is essential. All employees involved with the cost report must have extensive knowledge on the laws, regulations and guidelines which govern and define what costs are allowable and the appropriate method used to claim reimbursement for the cost of services provided. CarePoint Health will not submit a cost report that contains false or inaccurate information. In preparation, submission and settlement of CarePoint Health's cost report, the Finance Department will seek clarification from the intermediary of any dilemma which could impact the Hospital. In addition, CarePoint Health's Finance Department will comply with applicable auditing, accounting and financial disclosure laws.

### Financial Statements

All financial statements and other reports must reflect actual transactions and conform to generally accepted accounting principles. CarePoint Health requires that all documents present a high level of accuracy and completeness. CarePoint Health employees recognize that these records serve as a basis for managing the business and are important in meeting our obligations to our patients, employees, the government, suppliers and others.

## **FRAUD WASTE AND ABUSE**

All staff and business associates have the responsibility to prevent fraud, waste, and abuse. The CarePoint Health's Fraud, Waste, and Abuse policy specifies individual responsibilities and actions regarding fraud/dishonest acts.

Fraud - an intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to him/herself or some other person. It includes any act that constitutes fraud under applicable federal or State law.

Waste - The thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of resources owned or operated by CarePoint Health to the detriment or potential detriment of CarePoint Health. Waste also includes incurring unnecessary costs because of inefficient or ineffective practices, systems, or controls.

Abuse means provider practices that are inconsistent with sound fiscal, business, or medical practices, and result in an unnecessary cost to the Medicaid/NJ FamilyCare program, or in reimbursement for services that are not medically necessary or that fail to meet professionally recognized standards for health care. It also includes enrollee practices that result in unnecessary cost to the Medicaid/NJ FamilyCare program

## **INTELLECTUAL PROPERTY**

Intellectual property includes any invention, discovery, trade secret, technology, creation, scientific or technological development, computer software, or other form of expression of an idea that arises from the activities of persons employed by CarePoint Health, or anyone using CarePoint Health offices or facilities under the supervision of corporation personnel. CarePoint Health owns the intellectual property created by staff and business associates if the intellectual property is:

Created by the staff and business associates member within the scope of employment; created by the staff and business associates member on corporation time with the use of corporation facilities or supplies; commissioned by CarePoint Health pursuant to a signed contract; fits within one of the nine categories of works considered works for hire under copyright law; or results from research supported by federal funds or third-party sponsorship.

Staff and business associates must disclose the intellectual property created by the staff member or business associates to the Compliance Officer well before he or she submits any information about the intellectual property for publication, or makes any public disclosure or even a private disclosure to a commercial entity.

## **CONFLICTS OF INTEREST**

### General

It is the policy of CarePoint Health to prohibit its employees and other associates from engaging in any activity, practice, or act which conflicts with, or appears to conflict with, the interests of CarePoint Health, or its patients. All CarePoint Health employees, medical staff, board members, and contractors must disclose to the Compliance Officer any interest they or their immediate family may have with any organization which does business or competes with CarePoint Health.

### Gifts and Entertainment

Members of CarePoint Health's workforce shall not accept anything of value for any care or assistance provided to patients, except perishable, non-cash items of nominal value (e.g., basket of fruit, candy, flowers, etc.) for general consumption or enjoyment.

Members of CarePoint Health's workforce and/or their immediate family may accept non-cash gratuities (e.g., meals or entertainment) offered in the normal course of business, up to \$150 aggregate value in any 12-month period from a single individual or entity, unless offered with the implied or explicit expectation of favorable action or obligation. Gratuities above this value must be reported to the Compliance Office for Conflict of Interest assessment.

Members of CarePoint Health's workforce, and/or their family members, may not under any circumstances solicit anything of value from any vendor, client, patient, or visitor. **Exception:** In alignment with common industry practices, McCabe Ambulance van drivers and EMT personnel may accept gratuities while carrying out their official duties.

### Outside Employment

Since outside employment may constitute a conflict of interest if it places the employee in a position that might affect the employee's objectivity in carrying out his or her responsibilities, or lessens the efficiency, alertness or productivity expected of

the employee, managers and above are required to record their outside employment on the CarePoint Health's Conflict of Interest questionnaire and notify Human Resources and their supervisors accordingly. Employees may not use CarePoint Health's time, materials, information or other assets in connection with their outside employment.

#### Relationship with Suppliers

It is CarePoint Health's policy to use best efforts to ensure that all contracts are in compliance with Federal/State health care program statutes, regulations and policies. Business transactions must be entered into solely on the basis of the best interest of the CarePoint Health Entity. CarePoint Health seeks to comply with all Federal and State laws and regulations including the requirement not to contract with sanctioned individuals or companies.

### **COMPUTER USAGE**

#### Computer Information Security

It is a violation of law to disclose computer passwords; penalties range from a Class B misdemeanor to a felony depending on the related monetary damage. Computer passwords should be considered highly confidential. Staff and business associates should never disclose computer passwords to anyone other than those individuals in CarePoint Health Plans that have official capacity and approval from the Board of Directors to access staff and business associates passwords. Furthermore, staff and business associates should not write or otherwise document passwords in a place that is accessible by others.

#### Computer Software

Staff and business associates who use software licensed to CarePoint Health or an entity owned by CarePoint Health must abide by applicable software license agreements and may copy licensed software only as permitted by the license. Unauthorized duplication of copyrighted software is a violation of federal copyright law. Staff and business associates should direct any questions about applicable software license agreements to their Department Director.

### **HIPAA**

#### Privacy - Confidential Information

We protect the confidentiality of patient information and CarePoint Health's internal information. CarePoint Health securely files documents and we are careful about written and spoken communications so that information is given only to people authorized to receive it and unauthorized disclosures are prevented. We access only what is needed to provide care or to conduct CarePoint Health business.

CarePoint Health will only use and disclose a patient's protected health information ("PHI") in accordance with the state and federal laws and regulations and for the purposes of Treatment, Payment or Health Care Operations ("TPO"). Activities that constitute TPO are:

Treatment - the coordination or management of health care by a health care provider; the referral of a patient from one health care provider to another, or consultation between health care providers relating to a patient.

Payment - billing, claims management, health care processing, data processing related to billing, claims management, appropriateness of care, coverage under a health plan, pre-authorization of services, justification of charges and collection activities

Health Care Operations - certain administrative, financial, legal, and quality improvement activities that are necessary to run CarePoint Health's business and support the core functions of treatment and payment (*e.g. customer service activities, mergers and acquisitions, etc.*)

A signed patient authorization is necessary for all other transactions. It protects our patients and limits the amount of PHI which may be released.

#### Security

CarePoint Health safeguards access to protected health information and other confidential information. CarePoint Health provides its employees access to computer, computer networks, email systems and internet services solely to help employees do their work. Incidental and occasional personal use is permitted, so long as such use does not interfere with CarePoint Health's needs and operations, is not for personal gain and does not violate any Federal and/or State laws or any CarePoint Health policy.

## **SAFEGUARDING ASSETS**

### Preservation of Assets

At CarePoint Health, we use resources responsibly and effectively solely for the purposes of furthering CarePoint Health's activities. We do not use CarePoint Health's facilities or resources for our personal benefit, or for the benefit of family members, friends or others.

### Expenditure of Funds

CarePoint Health's funds are used only for the legitimate business purposes of the CarePoint Health Entity. Expenditures of CarePoint Health funds are recorded and accounted for in an accurate and timely manner in the CarePoint Health Entity's books of accounts. All accounts of the CarePoint Health Entity funds, except authorized imprest funds/petty cash accounts, shall be established and maintained in the name of the CarePoint Health Entity and may be opened or closed only on the authority of CarePoint Health's Board of Trustees.

## **WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES**

### Drug and Weapon-Free Workplace

CarePoint Health is committed to a drug-free environment. Staff and business associates reporting to work under the influence of an illegal controlled substance or alcohol, or unlawful manufacture, sale, distribution, dispensing, possession or use of a controlled substance is prohibited in the workplace and on any property under the control of CarePoint Health. The use of alcoholic beverages is prohibited in CarePoint Health facilities. However, the CEO or his/her designee of CarePoint Health may waive this prohibition with respect to any event sponsored by CarePoint Health.

Staff and business associates of CarePoint Health are required to notify the Compliance Officer within five (5) calendar days of a conviction for an offense involving a controlled substance that occurred in or on the premises controlled by CarePoint Health.

In order to ensure a safe environment for employees and customers, CarePoint Health prohibits the wearing, transporting, storage, or presence of firearms or other dangerous weapons in our facilities or on our property. Any employee in possession of a firearm or other weapon while on our facilities/property or while otherwise fulfilling job responsibilities may face disciplinary action including termination. A client or visitor who violates this policy may be removed from the property and reported to police authorities. Possession of a valid concealed weapons permit is not an exemption under this policy.

### Equal Employment Opportunity

CarePoint Health is an Equal Employment Opportunity/Affirmative Action employer. In the administration of its employment policies and practices, CarePoint Health does not discriminate against employees or applicants for employment because of race, color, national origin, sex, sexual orientation, religion, age, veteran status, or disability. CarePoint Health takes affirmative steps to ensure that applicants are hired, and staff and business associates are treated, in a non-discriminatory manner. CarePoint Health's commitment to equal opportunity principles applies to all aspects of employment, including recruitment, retention, promotion, compensation, benefits, and training.

### Sexual Harassment and Sexual Misconduct

CarePoint Health is committed to the principle that the working environment should be free from inappropriate conduct of a sexual nature. Sexual harassment and sexual misconduct are illegal and unprofessional. Staff and business associate members who engage in such conduct will be subject to disciplinary action, including termination.

### Workplace Health and Safety

All staff and business associates should perform their duties in compliance with all applicable institutional policies, federal, state and local laws and standards relating to the environment and protection of worker health and safety. Staff and business associates should become familiar with and understand how these laws, standards, and policies apply to their specific job responsibilities. Each staff and business associates member is responsible for advising their immediate supervisor of any serious workplace injury or any situation presenting a danger of injury so that timely corrective action may be taken. Department Directors must report unsafe practices or conditions to the Human Resources Department or (Compliance Officer).

### Workplace Violence

CarePoint Health strives to assure that staff and business associates are provided a safe working environment. Violence in the workplace is not tolerated. Workplace violence may be considered illegal and it is certainly unprofessional.

Staff and business associates members who are involved in violent actions against other individuals or verbal or written threats directed at individuals will be subject to disciplinary action, including termination.

Staff and business associates of CarePoint Health who observe or experience any form of harassment or discrimination should report the incident to the Safety Officer or (Compliance Officer).

### Dishonest or Illegal Activities

Dishonest or illegal activities on CarePoint Health premises or while on business representing CarePoint Health, will not be condoned and may result in disciplinary action, up to and including dismissal and criminal prosecution.

### Training and Development

Training will be given to all employees at orientation to ensure employees have the proper knowledge of the organizational policies and processes to perform their duties and meet the needs of CarePoint Health's patients. Training relating to specific compliance issues and concerns, including but not limited to billing and coding issues, and specific federal regulatory provisions will be required for employees with relating skill sets and/or responsibilities. Attendance to related training/education sessions is mandatory.

### Verification of Qualifications

CarePoint Health hires only qualified individuals with proper expertise, licenses and experience. Qualifications are verified in connection with offering employment. CarePoint Health performs monthly exclusions checks on all employees using the Office of Inspector General (OIG) databank, System for Award Management (SAM) database and the NJ State Debarment database.

### Respect for Cultural Values and Religious Beliefs

CarePoint Health values diversity and treats patients, families, visitors, associates, medical staff and all others with respect and dignity.

### Employment of Relatives

Employment of relatives wherein such relatives have a direct reporting relationship to a member of senior management, including the CEO, shall be prohibited. In the event the situation involves a direct reporting relationship with a supervisor, manager, or director, this employment too shall be prohibited unless a waiver is granted by Carepoint Health leadership.

## **MARKETING**

To respect patients' rights to privacy and confidentiality, the CarePoint Health Entity will protect patient information from release to agencies, organization, or entities seeking to use patient information for marketing purposes in accordance with all Federal, State and JCAHO Privacy rules and regulations. CarePoint Health's patient/member information database will not be sold to any agency, organization or individual for any purpose.

Photographs of patients/members will not be used for any marketing material or news stories without the patient/member's verbal and written consent. Photographs of minors (under the age of 18) will only be taken and published if the verbal and written consent of one or both parents is received.

## **REPORTING ILLEGAL AND UNETHICAL BEHAVIOR**

All employees are required to comply fully with the rules, standards and principles of the Code of Conduct. Employees are required to report any suspected violations to a Manager, the service line Vice Presidents, the Compliance Director, or Vice President of Corporate Compliance. You may also use the Compliance Program confidential Compliance Hotline whereby you can remain anonymous. CarePoint Health will attempt to treat all reports, including the identity of the reporting employee, confidentially.

**As set forth in our Non-Retaliation Policy: No adverse action or retaliation will be taken against any employee because he/she reports in good faith a suspected violation of the Code.**

## **RECORDKEEPING**

### Accuracy of Records

Every CarePoint Health employee is responsible for the integrity and accuracy of the documents and records not only to comply with regulatory and legal requirements but also to ensure records are available to support the business practices and actions. No one may alter or falsify information on any record or document. CarePoint Health employees must not tamper with records.

### Record Retention

Medical and business documents and records are retained in accordance with the NJ State Division of Archive and Record Management. Please see your specific entity policy on Record Retention. Medical and business documents include paper documents such as letters and memos, computer-based information such as e-mail or computer files on disk or tape and any other medium that contains information about the organization or its business activities.

### Disposal of Documents and Records

It is important to retain and destroy records only according to CarePoint Health's policy. Therefore, no one may remove or destroy records prior to the specified date without first obtaining permission as outlined in the record management policy. Records must never be destroyed in an effort to deny governmental authorities that which may be relevant to a government investigation.

### Photocopying of Copyrighted Material

Most works should be presumed to be copyright protected, unless further information from the copyright holder or express notice reveals that the copyright holder intends the work to be in the public domain. Permission must be obtained from the copyright owner to copy copyrighted materials where: copying extends beyond the boundaries of the guidelines contained in the copyrighted materials policy; advice of the General Counsel has not been sought; and, copying is not fair use.

## **CONTACT WITH OUTSIDE INVESTIGATORS**

### Contacts with the Government and Outside Investigators

CarePoint Health we expect to cooperate in government investigations with all reasonable demands made in any government investigation. However, it is essential that the legal rights of CarePoint Health and its staff and business associates be protected. If a staff and business associates member receives a subpoena, inquiry, or other legal document from any governmental agency regarding corporation business, whether at home or in the workplace, the staff and business associates member must immediately notify the Risk Manager or (Compliance Officer). CarePoint Health does not prohibit a staff member or business associates from speaking to any government investigator or agent. However, to best protect the staff and business associates and CarePoint Health, if any governmental agency or any attorney contacts a staff and business associates member at home concerning corporation business, the staff member or business associates may politely ask the agent to contact the CarePoint Health General Counsel, Risk Manager or Compliance Officer.

**McCabe Ambulance Employees:** all McCabe personnel must forward investigatory requests to management. McCabe management will be responsible for release of records and/or other informational requests.

## **PHYSICIAN RELATIONSHIP**

### Preventing Improper Referrals or Kickbacks

CarePoint Health strictly adheres to the Federal and State laws and regulations regarding the relationship between hospitals and physicians who may refer patients to the facility. Therefore, we accept patient referrals/admissions solely based on the patient's clinical needs and our ability to render the necessary services. CarePoint Health does not pay or offer to pay anyone for referral of patients/members.

Adherence to Antitrust Regulations

CarePoint Health will comply with all applicable Federal and State Antitrust laws.

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VP, Corporate Compliance & Internal Audit

[ComplianceOfficer@carepointhealth.org](mailto:ComplianceOfficer@carepointhealth.org)

Hotline: 844.246.4365

## Acknowledgement Process

CarePoint requires all employees to sign an acknowledgment confirming they have received the Code of Conduct (“The Code”), understand that it represents mandatory policies of CarePoint and agree to abide by the Code during the entire term of employment. New employees are required to sign this acknowledgment as a condition of employment. Every existing employee is also required to participate in annual compliance training and update their acknowledgment of the Code

## Receipt and Acknowledgment

I acknowledge that I have received my personal copy of the CarePoint’s Code of Conduct (“The Code”). I understand that I am responsible for knowing its content and conducting all CarePoint activities consistent with these policies, principles and standards. I also understand that I am responsible for reporting any alleged or suspected violations of The Code to the appropriate person(s) identified in this handbook. I may contact the Compliance Department at:

Bayonne Medical Center  
Christ Hospital  
Hoboken University Medical Center  
CarePoint Health Medical Group  
Garden State Healthcare Associates  
CarePoint Health Management Service Organization  
McCabe Ambulance  
Quality Care Associates

VP, Corporate Compliance & Internal Audit  
[ComplianceOfficer@carepointhealth.org](mailto:ComplianceOfficer@carepointhealth.org)  
Hotline: 844.246.4365

I further understand that failure to follow the Code will subject me to disciplinary action, up to and including suspension or termination. In addition, I understand there is also a range of penalties which can apply to individuals or organizations for violation of applicable Federal and State laws and regulatory requirements.

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Department: \_\_\_\_\_

Date: \_\_\_\_\_