



POLICY: CODE OF BUSINESS CONDUCT	DISTRIBUTION: ORGANIZATION WIDE
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PREPARED BY: VP COMPLIANCE AND INTERNAL AUDIT	APPROVED BY: VP COMPLIANCE

POLICY

CarePoint Health (Bayonne Medical Center, Christ Hospital, Hoboken University Medical Center, CarePoint Health Medical Group, Garden State Healthcare Associates, CarePoint Health Management Associates, McCabe Ambulance, Quality Care Associates, LLC) is dedicated to providing each patient and their family with the highest quality of healthcare services. In addition, CarePoint Health is committed to conducting its business activities in full compliance with all federal, state and local laws and regulations. As such, CarePoint Health will act upon any report and/or recommendations from authorized agencies, as appropriate.

It is the obligation of each employee, contractor, and medical staff member to make a good faith effort to understand CarePoint Health policies and standards. Additionally, policies, rules and regulations that affect each area of responsibility should be understood, and clarification sought when something is unclear. In furtherance of providing specific guidance regarding standards or employee responsibilities, CarePoint Health has adopted a Code of Business Conduct and Ethics (“the Code”).

Violations of the Code may result in disciplinary action leading up to and including termination, based on the circumstances. In certain cases criminal prosecution may result. No adverse action or retribution will be taken against an employee, contractor or member of the medical staff who in good faith, reports a suspected violation of the Code.

CarePoint Health will regularly review, enhance, and amend the Code to meet evolving compliance guidelines and to implement more internal control and monitoring processes.

PURPOSE

The purpose of this Code is to communicate in writing, the expectation for basic standards of ethical behavior of all CarePoint Health employees. It is expected that CarePoint Health employees will maintain the highest ethical, professional and legal standards. CarePoint Health employees, contractors and members of the medical staff will recognize that each individual is accountable for their own actions; however, as members of the community we are collectively accountable for upholding high standards of behavior and compliance with all applicable law and regulations.

RESPONSIBILITIES

All new employees and contractors will be issued a Code during New Hire Orientation at which time they will sign an acknowledgement statement that they have received the Code and agree to abide by it during their employment with CarePoint Health (Attachment A). Members of the medical staff will receive the



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Code and acknowledge receipt during the credentialing process. Revisions or updates to the Code will be available to employees and contractors on the electronic learning management system platform for employees and contractors to review and acknowledge during mandatory annual compliance training. Members of the medical staff will receive updates during each re-credentialing cycle and may obtain copies sooner from the medical staff office.

In accordance with the Code, all CarePoint Health employees, contractors and medical staff have an obligation to:

- Follow CarePoint Health’s Mission and Vision Statements;
- Become familiar with the CarePoint Health Code of Conduct (especially in the areas that pertain to their responsibilities); and
- Report known or suspected violations of the Code, hospital policy, law or regulations.

The Code is intended to be comprehensive and easily understood. CarePoint Health has established numerous policies and procedures to promote compliance with sound legal and ethical principles, which may not be described in the Code. The current subject matter addressed in the Code includes:

- Mission Statement
- Vision Statement
- Patient/Client Relations
 - Quality of Care
 - EMTALA
 - Patients’ Rights
- Business and Financial Reporting
 - Billing for Services
 - Errors and Corrective Action
 - Coding
 - Cost Reports



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- Financial Statements
- Fraud Waste and Abuse
- Intellectual Property
- Conflicts of Interest
 - General
 - Gifts and Entertainment
 - Outside Employment
 - Relationship with Suppliers/Vendors
- Computer Usage
 - Computer Information Security
 - Computer Software
- HIPAA
 - Privacy
 - Treatment
 - Payment
 - Operations
 - Security
- Safeguarding Assets
 - Preservation of Assets
 - Expenditure of Funds
- Workplace Conduct and Employment Practices



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- Drug and Weapon Free Workplace
- Equal Employment Opportunity
- Sexual Harassment and Sexual Misconduct
- Workplace Health and Safety
- Workplace violence
- Dishonest or Illegal Activity
- Training and Development
- Verification of Qualifications
- Respect for Cultural Values and Religious Beliefs
- Employment of Relatives
- Marketing
- Reporting Illegal and Unethical Behavior
- Recordkeeping
 - Accuracy of Records
 - Record Retention
 - Disposal of Documents and Records
- Contact with outside Agencies/Investigators
- Physician Relationships



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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 acknowledgement 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 Physician Group
 Quality care Associates, LLC
 CarePoint Health Management Service Organization

VP, Corporate Compliance
complianceofficer@carepointhealth.org
 Hotline: 844.246.4365

Clover Health Plan
compliance@carepoint.org
 Helpline: 201.432.2133

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: _____