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Owner: Mark Coleman: Director of Employee Relations
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Applies To:

Code of Conduct, 1043-20-17

POLICY

This Code of Conduct ("Code") provides employees with information on the basic direction that Hackensack University Medical Center (HackensackUMC) expects them to follow. Every employee, regardless of his or her position in the organization, is required to follow the Code. The Code establishes guidelines to ensure that Medical Center employees conform to the highest ethical standards and comply with all applicable laws, rules and regulations.

INTRODUCTION TO THE CODE OF CONDUCT

The Code does not address every situation and does not set forth every applicable rule, since there are other Medical Center policies, procedures and instructions, as well as common sense standards of conduct to which employees are expected to adhere.

Violations of the Code or of any other Medical Center Policy may result in disciplinary action up to and including termination.

The Code imposes an affirmative duty upon all employees to report any actual or perceived violations and the Medical Center will devote sufficient resources to investigate any report of violation of this Code. It is the Medical Center's policy that no adverse action or retribution will be taken against any employee reporting in good faith a suspected violation.

QUALITY OF CARE

HackensackUMC is committed to providing the highest possible quality patient care. Patient care services are provided across the continuum in accordance with the Medical Center's Mission, Vision, and Guiding Principles and Values.

PATIENTS' RIGHTS

Clinical decisions are based solely on the identified healthcare needs of the patient without regard to payment, the patient's ability to pay, or the financial compensation of the caregiver. To avoid compromise and to contribute to high quality patient care and satisfaction, HackensackUMC adheres to the New Jersey State Law and Regulations relative to patient rights, The American Hospital Association Patient Care Guidelines and the Joint Commission standards related to Patient's Rights. It is every employee's responsibility to know and observe the Patients' Bill of Rights.

Examples of potential violations of Patients' Rights:

- Any incident of patient abuse, or any violation of the Patients' Bill of Rights.
- Failure to assist any patient or to provide a service that is within the normal and usual scope of the employees' duties or which is required by an emergency relating to the patient.

MEDICAL NECESSITY

To fulfill our commitment to providing the highest quality patient care, it is the expectation that physicians, and other appropriately licensed or authorized individuals, will only provide services they believe are medically necessary for the diagnosis and appropriate treatment of their patients.

COMPLIANCE WITH LAWS AND REGULATIONS

The Medical Center and its employees will comply with all applicable laws, rules, and regulations. It is the expectation that all employees will carry out their job function in accordance with their given professional standards as well as adhering to all applicable laws, regulations, and policies and procedures. The Medical Center will comply fully with the law and cooperate with any reasonable demand in a government investigation or audit. HackensackUMC does not condone any false statements to a government agent or other payer. Medical Center employees have an obligation to promptly report violations of policy and/or the law. Avenues to report such violations are provided through open communication with management, the Corporate Compliance Department, the Employee Hotline, and Employee Relations in Human Resources.

RECORDKEEPING, CODING, AND BILLING

Employees are expected to appropriately and accurately record transactions and activities in a timely manner. The Medical Center's books, records, personnel files, employee health files, and other documentation will be maintained to adequately support all transactions, reports, and statements. The Medical Center requires that all bills reflect care deemed "medically necessary" and that proper and adequate documentation supporting this fact be appropriately maintained in the patient record. Medical Center employees shall take every reasonable precaution to ensure that their work is accurate and reflective of the service(s) rendered to the patient.

Examples of possible violations of the documentation standard:

- Falsification of employment application, any other Medical Center document or record, such as a patient's chart or a billing statement; or a document provided to the Medical Center, such as doctor's note;
- Pre-documentation or adding to a record without noting the correct time of the addition;
- Swiping in or out for another employee, or requesting another employee to do so.

POSITIVE WORKING ENVIRONMENT

HackensackUMC is committed to providing a positive working environment for its employees. This means that the Medical Center shall put forth its best efforts to provide a drug-free and otherwise safe workplace for its employees, and in accordance with its equal employment opportunity commitment, an environment in which employees are not subjected to unauthorized solicitation, illegal discrimination or harassment of any kind; a workplace where excellence is the standard and achievements are recognized. This positive working environment is the responsibility of every employee and will be achieved through mutual respect and cooperation among all levels of the staff.

Examples of negative behaviors that can adversely impact a positive working environment and may lead to disciplinary action up to and including termination:

- Insubordination
- Using foul and/or abusive language
- Gambling on Medical Center premises
- Immoral, indecent or disorderly conduct of any nature, or lending money for interest on Medical Center premises
- Harassment of any kind including that based on sex, race or any other protected classification
- Unauthorized use and/or possession of narcotics, dangerous drugs, intoxicating beverages or substances, or being under the influence of intoxicants or drugs on premises or during work time
- Threatening, intimidating, harassing, coercing, or fighting with another employee, by word or deed, whether on or off Medical Center premises
- Failure to follow the rules concerning solicitation and/or distribution of literature
- Unauthorized posting or removal of bulletins or notices on Medical Center property
- Disregard of one's appearance, uniform, dress, or personal hygiene
- Proven abuse of the leave policies
- Dishonesty
- Any other behavior in violation of HackensackUMC's Guiding Principles and Values

CONFIDENTIALITY

The Medical Center is dedicated to protecting the privacy of our patients by preserving the confidentiality of individually identifiable health information, whether or not such information is maintained electronically, in writing, is spoken or in any other medium. Access to Medical Center's books and records is limited to authorized individuals on a "need to know" basis as defined by Medical Center policy and should not be disclosed to others unless there is a valid business need.

Examples of violation of the confidentiality standard:

- Accessing a medical or financial record outside of your normal job responsibilities
- Disclosing any confidential information to someone who does not have a need to know
- Taping or video recording the Medical Center or individuals without knowledge or consent
- Unauthorized possession, use, copying or reading of Medical Center records or disclosure of information contained in such records to unauthorized persons.

CONFLICT OF INTEREST

The Medical Center's best interest is the single factor to be considered in all business dealings. Employees in their business dealings must never be influenced, or even appear to be influenced, by personal interests. Any actual or potential conflict of interest must be promptly reported to the employee's supervisor or the Chief Compliance Officer.

Examples of conflicts of interest:

- Failing to disclose when an employee or a member of his/her family has a financial interest in an organization doing or seeking to do business, or competing with the Medical Center.
- Undertaking any activity that is aimed at, or that could reasonably have the effect of, interfering with the functioning of the Medical Center. Any outside activity, such as a second job or self-employment, must be kept totally separate from employment with the Medical Center.

- Participating in any activity, including outside activities, that could adversely affect the independence and objectivity of their judgment, interfere with the timely and effective performance of their duties and responsibilities, or that could discredit the Medical Center.

GIFT POLICY

An employee or a member of his/her immediate family shall not accept or solicit, even indirectly, gifts, gratuities, loans, "kick backs", special privileges, services, or other benefits of hospitality from vendors, suppliers or other contractors. Family members, for the purposes of this policy, include an employee's spouse, parents, grandparents, children, grandchildren and siblings.

- Gifts or gratuities of any amount are prohibited. Gifts include, but are not limited to, payments in cash or cash equivalents (e.g., gift certificates), entertainment, non-business meals or promotional materials of nominal value (e.g. imprinted pencils, calendars, memo pads)

Exceptions to the gift policy:

- Meals in a social setting or entertainment in the normal course of business may be accepted as a matter of courtesy, and should be, when practical, on a reciprocal basis.
- Invitations for special events such as, Medical Center fundraisers, sporting events, trade shows or where Medical Center business may be conducted, may be accepted provided that attendance is in the best interest of the Medical Center. Such invitations must be reported and approved by the employee's supervisor.

Employees shall report gifts and promotional materials of nominal value promptly to their supervisor and then return them to the donor, if possible, or should the person persist, the employee may suggest that donations be made through the Hackensack University Medical Center Foundation. If there is a concern that declining or returning a gift would offend the giver based on culture or custom, before speaking with the giver, the employee should first discuss with their supervisor or the Office of Corporate Compliance.

Examples of violations of the gift policy:

- Accepting gifts, industry sponsored meals (unless explicitly permitted by policy), tips or gratuities from vendors, patients or visitors
- Soliciting tips or gratuities from patients or visitors

ACCOUNTABILITY FOR SAFETY

Staff shall be accountable at all times to provide and maintain a safe and healthful environment for patients, visitors, and other staff members. The highest priority for all employees, regardless of their position or function within the Medical Center, shall be the care and safety of patients. It is the duty of all Medical Center staff to report any infractions, deliberate or otherwise, regarding the environment of care to his/her supervisor and/or the safety officer.

Examples of behaviors that can adversely impact a safe environment:

- Possession of firearms or other types of weapons while on Medical Center property
- Commission of a work-related crime whether on or off premises or duty
- Violation of any and all safety rules
- Creating or contributing to unsafe or unsanitary conditions by act or omission
- Smoking in any/all buildings

USE OF MEDICAL CENTER ASSETS

Every employee is accountable for the responsible use of Medical Center resources. All employees should avoid waste and spoilage when using supplies. Employees are required to prevent the loss, damage, misuse, or theft of Medical Center property and should promptly report any actual or suspected loss, damage, misuse, theft or destruction of Medical Center property to their supervisor.

Misuse or Theft of Medical Center Assets

- Examples of misuse or theft of work time include:
 - Excessive tardiness, absenteeism, or unauthorized absence from the employee's work station during work time
 - Loafing or sleeping on the job during the employee's working hours
 - Unauthorized payment for entering or remaining inside Medical Center property outside of your scheduled working hours
- Examples of misuse or theft of Medical Center property include:
 - Unauthorized parking in undesignated Medical Center parking areas and/or unauthorized use of Medical Center complimentary parking vouchers
 - Theft or unauthorized possession of property belonging to the Medical Center, to another Medical Center employee, or to a patient or visitor to the Medical Center;
 - Negligent or deliberate destruction, misuse, or unauthorized use of property belonging to the Medical Center, to another Medical Center employee, or to a patient or visitor to the Medical Center; including but not limited to use and access of computers, and use of telephones, copy, and fax machines.

HUMAN RESOURCES

Equal Employment Opportunities

HackensackUMC is committed to the principle of equal employment opportunity. Applicants and employees are evaluated by the Medical Center on their individual merit, and under no circumstances will the Medical Center discriminate against any individual on the basis of sex, race, creed, color, religion, national origin, ancestry, age, nationality, marital or familial status, sexual orientation or preference, handicap or disability which can be reasonably accommodated without undue hardship, veteran status, or any other protected classification. This commitment applies to all terms and conditions of employment, including, but not limited to, hiring, promotion, training, and the provision of benefits/compensation.

Harassment-Free Workplace

It is the Medical Center's policy to provide employees with a workplace free of harassment. Harassment is defined as any behavior that has the purpose or effect of unreasonably interfering with an individual's work performance or which otherwise creates an intimidating, hostile, or offensive working environment. Harassment can be sexual in nature or it can be based on age, sex, race, national origin, disability, religion, or any other protected classifications. Any offer or request for a non-work related favor that is made as a term or condition of employment or that is used as a basis for an employment decision or for evaluating the merits/productivity of an employee qualifies as harassment.

Harassment may take different forms, and may involve, but is not limited to, visual displays, suggestive remarks or jokes, gestures, sexual demands, propositions, or unwanted physical contact. Whatever form it takes, the Medical Center will not permit any employee to harass anyone, including but not limited to other employees, patients, visitors or vendors. Similarly, the Medical Center will not allow employees to be illegally

harassed by non-employees, including but not limited to patients, visitors or vendors. It is the responsibility of all employees to assure a non-intimidating work atmosphere for their co-workers.

Employees who believe that they have been harassed, whether or not they wish to confront their alleged harasser, and employees who become aware of harassment, must notify Employee Relations in Human Resources, a member of management, or the hot line (888-411-0012) immediately. No retaliation by anyone will be allowed against an employee who reports harassment, except that employees who knowingly make false reports may be subject to disciplinary action up to and including termination. For additional information please refer to [Human Resources Harassment Policy #1043-20-16](#).

Raising a Concern

Hackensack University Medical Center prides itself on its ability to deal directly with employees on all issues and at all levels. Should you have questions or concerns regarding any work-related issue, especially those related to the Code of Conduct, you are encouraged to first speak with your immediate supervisor. If, however, a conference with management does not resolve a particular issue, Medical Center employees may participate in a more formal dispute resolution procedure. At any time you may access the Chief Compliance Officer either directly or through the Compliance Hot Line at (888) 411-0012. The Hot Line is available 24 hours a day, 365 days per year. All calls received through the Hot Line will be kept confidential and your anonymity will be protected to the extent permitted by the law. [Hot Line Operations Administrative Policy #703](#).

Hackensack University Medical Center is committed to maintaining an environment free of fraud, abuse and unethical practices of any kind. [Administrative Fraud and Abuse Prevention-DRA Compliance Policy #1521](#).

The Medical Center has a policy of non-retaliation or retribution for all good faith reporting of these practices. [Non-Retaliation/Retribution for Reporting Administrative Policy #703-1](#).

The Code of Conduct is also included in the [HackensackUMC Employee Handbook](#).

If you have any questions regarding this policy, you may contact the Employee Relations hotline in Human Resources at extension 71128.

No deviation from this policy is permissible without written Human Resources approval.

All revision dates: 12/2013, 09/2012, 10/2011, 04/2001, 06/1998, 11/1994, 02/1994, 01/1992

Attachments: No Attachments

	Committee	Approver	Date
		Marwah Tahoun: Employee Relations Specialist III	pending