

Code of Ethics and Corporate Compliance Program



Atlantic
Health System

Message from the President and CEO



Dear Colleagues:

At Atlantic Health System, we are committed to our PRIDE values – Pride, Respect, Innovation, Diversity and Inclusion, and Extraordinary Caring. These values guide and inspire us to deliver the highest quality care to our patients and to treat our team members, visitors and patients with sensitivity and respect.

The Atlantic Health System Code of Ethics (“Code”) is an extension of our PRIDE values. The Code summarizes the basic principles of behavior and requirements to comply with our policies and the law. Atlantic Health System expects team members and vendors to adhere to the Code in every interaction with patients and families, colleagues and members of our broad community.

If you are in doubt about the right course of action or observe an action inconsistent with our values or the Code, please consult with your leader or with the contacts provided in the Code to determine the best path forward.

The Code provides you with information on how to report any issues that might be inconsistent with our values, the Code, our policies or the law. Atlantic Health System does not tolerate retaliation against anyone for asking questions, reporting violations or raising concerns in good faith.

In the ever-changing world of healthcare, our patients, communities, colleagues, business partners and team members can rely on us to maintain the highest standards of ethical conduct at all times. As always, thank you for everything you do to care for our patients, communities and each other.

A handwritten signature in black ink, appearing to be the name 'B. Gagnolati'.

Brian Gagnolati
President and CEO, Atlantic Health System

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Purpose

The Code details and promotes our institutional values and is intended to guide our team members in conducting themselves ethically and legally. Throughout the Code, team members, vendors and medical staff are collectively known as team members.

Each section of the Code provides information about who you may contact with questions related to that section's topic. Team members may find additional, helpful resources on the Atlantic Health System Corporate Compliance Compass page.

“Act as if what you do makes a difference. It does.”

- William James
Father of American Psychology

Corporate Compliance Program

The Corporate Compliance Department promotes ethics and integrity and is responsible for monitoring compliance with federal and state laws, regulations and Atlantic Health System's Corporate Compliance policies. The department investigates possible breaches of patient privacy and compliance matters and assists departments with responses to issues and corrective action when needed.

Additionally, the department provides guidance on compliance and privacy-related inquiries. The department tracks and analyzes compliance and privacy activities, and develops training and risk mitigation programs.

The Corporate Compliance Department is composed of a team of legal, nursing, financial, ethics and compliance professionals. For more information about our compliance program, team members can visit the department's web page on The Compass.

The Atlantic Health System Board of Trustees is responsible for overseeing the compliance program. The Vice President, Corporate Compliance and Internal Audit, Chief Compliance Officer, reports to the Audit and Compliance Committee of our Board of Trustees on a regular basis to provide information about our compliance program.

The Vice President, Corporate Compliance and Internal Audit, Chief Compliance Officer leads the compliance department and reports to the President and CEO of Atlantic

Health System. Our Senior Leadership Compliance Committee is led by the Chief Compliance Officer. This committee meets regularly regarding the compliance program.

Report a Concern

In order to ensure Atlantic Health System team members follow the rules in our everyday work activities, the Corporate Compliance Department requires everyone's commitment to:

- Avoid situations that are improper or have the appearance of being improper
- Report activities that may violate Atlantic Health System policies and/or federal and state laws

Upholding this commitment requires teamwork. For this effort to be successful, all team members must work together.

Who to Contact

Anyone can report a suspected or actual issue to one of the following:

- His/her supervisor, manager, director or site HR representative
- Vice President, Corporate Compliance & Internal Audit, Chief Compliance Officer, Privacy Officer
- Director, Corporate Compliance and IRB Advisor
- Director, Internal Audit and Enterprise Risk Management
- Director, Clinical Audit and Drug Diversion
- Compliance Manager
- Privacy Manager
- Chief Legal Officer
- Compliance@atlantichhealth.org
- Corporate Compliance secure fax at 973-660-9059

- Corporate Compliance toll-free hotline (anonymous) at 888-213-0837. Our multilingual hotline is available 24 hours a day, every day of the year
- On-line reporting (anonymous) at atlantichealth.alertline.com

What to Include

In order to effectively investigate, please provide as much information as possible, such as:

- Who is involved
- What the involved parties are doing
- When the improper acts occurred or are occurring
- Why you believe that they are occurring
- How you became aware of the issue
- Where the issue occurred

Confidentiality

The Corporate Compliance Department endeavors to treat all reports confidentially and all team members' identities will only be revealed if it is absolutely necessary.

Atlantic Health System will not take adverse action against any team member if they, in good faith, report a suspected or actual violation.

Non-Retaliation

AHS team members may be worried that other staff will know they came forward and may retaliate against them. Team members who are found to have engaged in retaliation will be subject to disciplinary action up to and including employment termination. If team members report a problem or concern in good faith, they will be protected from retaliation, retribution and harassment.

Key Policies

1-02 Reporting & Open Communications(Corporate Compliance)

5-01 Patient Privacy & Confidentiality (Corporate Compliance)

Protection from Discrimination, Harassment and Retaliation (Human Resources)

“You can get compliance as a by-product of just doing your job right in the first place.”

- Colin Clark
Information Security professional



Patient Care

The Atlantic Health System mission is to design and deliver high quality, innovative and personalized health care, to build healthier communities and to improve lives for patients, consumers, and caregivers. Our main focus is for the well-being, comfort and dignity of our patients and members. In its provision of services and care, Atlantic Health System does not distinguish or discriminate based on race, color, age, religion, gender, pregnancy, gender identity or expression, breastfeeding, national origin and/or nationality, ancestor, creed, marital, civil union, or domestic partnership status, Vietnam-era veteran, other covered veteran, liability for service in the Armed Forces of the United States, disability, genetic information (including refusal to submit to a genetic testing and refusal to provide genetic information), citizenship status, functional or sexual orientation, use of a service dog, unemployed status, smoker or use of tobacco products.

Extraordinary Caring

At Atlantic Health System, the patient experience is defined as Extraordinary Caring. This is the standard that we strive to provide to all our patients. We use data from our patients' feedback to make strategic enhancements for an even higher degree of satisfaction with future visits. Consistent use of industry accepted practices, such as AIDET (Acknowledge, Introduce, Duration, Explanation, Thank you), provides best-in-class care across our many sites and settings. Always keeping in mind our Code and PRIDE values is the main way we provide Extraordinary Caring.

Patient Privacy

Team members demonstrate respect for our patients by protecting the confidentiality of all personal information. This information, known as “protected health information” or “PHI,” can include names, addresses, phone numbers, Social Security numbers, medical diagnoses, family illnesses and other personal information.

Federal and state laws, as well as quality of care standards, require team members to keep this information confidential. Atlantic Health System team members must never access, use, disclose or discuss patient information unless it is for the purpose of treatment, payment or health care operations as necessary for patient care or as required by law. Subject to limited exceptions, patient privacy will be protected and patient- and member-specific information will be released only to persons authorized by law or by the patient’s written authorization.

If any team member is unsure of the rules governing the release of PHI or other patient-related data, they should ask and be sure they understand them before they release any information.

Key Policies	
6-01 Patient Confidentiality & Privacy	6-08 Marketing and Fundraising
6-01 Health Information Access, Use and Disclosure	6-09 Genetics, HIV and Psychotherapy
6-01 Consent to use PHI for TPO	6-10 Electronic Communications and Signatures
6-04 Authorization	6-11 Personal Representatives
6-05 Permitted Communication	08-04 Notice of Privacy Practices
6-06 Patient Directory	08-09 Aviso de practicas de privacidad (NPP)
6-07 Patient Rights	

“Quality is never an accident. It is always the result of intelligent effort.”

- John Ruskin
English writer and philosopher

Employee Conduct

Conflict of Interest

Team members have a duty to avoid conflicts of interest and a duty of loyalty to Atlantic Health System. Our business conduct must always put Atlantic Health System’s interests ahead of our personal interests.

Our team members should not use their positions or confidential information obtained in the course of their work for personal gain.



Our team members must make sure that any outside jobs or positions do not conflict with their work at Atlantic Health System.

Team members must disclose any potential conflict of interest by filling out a Conflicts/Gifts/Travel/Endorsements/Disclosure form and submitting it to Corporate Compliance.

The following examples demonstrate possible conflicts of interest:

- Acting as a director, partner or consultant of a firm that provides services, supplies or equipment to Atlantic Health System or is a competitor
- Having a material financial interest (or a family member having such a financial interest) in a firm that is either a competitor of, or a vendor (or potential vendor) to Atlantic Health System

- Purchasing or leasing real estate that may increase in value based on knowledge that Atlantic Health System may have an interest in the property
- Hiring Atlantic Health System vendor personnel to perform personal work for a team member or a team member's family without appropriate administrative approval
- Having research funded by a company or evaluating a product owned, manufactured or distributed by a company in which a team member (or a family member) has received significant compensation

Certain members of the Atlantic Health System community must file annual Conflict of Interest disclosure forms. They will be notified if they are required to do so.

Key Policies

4-01 Conflicts, Gifts and Endorsement

5-04 Financial Conflict of Interest

8-01 Conflicts/Gifts/Travel/Endorsements/Disclosure

“Quality means doing it right when no one is looking.”

- Henry Ford
Founder of Ford Motor Company

Confidentiality of Business Data

In addition to patient information, other information created by Atlantic Health System during the course of business, such as staff data, financial data, development plans, proprietary research data, marketing strategies or information about pending or contemplated business deals, is confidential information that belongs to Atlantic Health System.

All data relating to team members, including data generated when team members are patients at our facilities, is strictly confidential.

When a team member receives confidential information in the course of performing their job, they may only use it for Atlantic Health System business purposes; they may not use it for their own or their family’s benefit and they must not disclose it to others for their personal use.

Information received by Atlantic Health System, under an obligation to maintain its confidentiality, may not be disclosed in violation of the obligation to maintain its confidentiality.

Equal Opportunity

It is our policy to provide equality of opportunity to all team members and applicants for employment. Team members do not discriminate based on a person’s race, color, age, religion, gender, pregnancy, gender identity or expression, breastfeeding, national origin and/or nationality, ancestor,

creed, marital, civil union, or domestic partnership status, Vietnam-era veteran, other covered veteran, liability for service in the Armed Forces of the United States, disability, genetic information (including refusal to submit to a genetic testing and refusal to provide genetic information), citizenship status, functional or sexual orientation, use of a service dog, unemployed status, smoker or use of tobacco products.

Leadership and Professionalism

Appropriate leadership and professionalism requires that team members engage in reasonable conduct patient advocacy, recommend improvement in patient care, and participate in the operations, leadership or activities of the staff, including the medical staff. Behaviors that undermine a culture of safety include, but are not limited to:

- The use of profanity within hearing distance of patients or visitors
- The refusal to speak or respond to others
- Inappropriate physical contact
- Sexual, religious, racial or other unlawful harassment
- Aggressive actions or behaviors
- Destruction of Atlantic Health System property

Violations of the Code by any team member affiliated with, or employed by, Atlantic Health System will be addressed in accordance with our policies. Violations by practitioners



credentialed by a medical board, physician trainees and medical students will be addressed by the procedures provided for in the bylaws, rules and regulations of the medical staff, as well as relevant Atlantic Health System policies.

Harassment

Team members must commit to maintaining a work environment in which all individuals are treated with respect and dignity. All team members have the right to work in a professional atmosphere free from harassment and discrimination.

Work relationships among team members and persons outside of Atlantic Health System should be businesslike and free of harassment and discrimination. If a team member believes they are being harassed or discriminated against they should report it. Team members who report harassment or discrimination, in good faith, are protected by our Protection from Discrimination, Harassment and Nonretaliation policy.

Drug and Alcohol-Free Workplace

Atlantic Health System prohibits the unauthorized manufacture, possession, use, sale, and distribution of drugs in

the workplace. Atlantic Health System also prohibits team members from being under the influence of alcohol, any illegal drug, or any non-prescribed controlled substance while at work or conducting business as a representative of Atlantic Health System.

Team members with substance abuse problems can find help through our Employee Assistance Program. If a team member or another staff member shows signs or symptoms of illness or impairment, management, Human Resources or the appropriate authority should be notified for their as well as everyone else's safety.

Violence-Free Workplace

Atlantic Health System does not tolerate aggression or violence on our premises by anyone working with or on behalf of Atlantic Health System.

If a team member witnesses someone engaging in violent or threatening behavior, they must report it immediately to a manager or to the Protection and Security Services Department. This includes persons acting in a disruptive or aggressive manner.



Research

Atlantic Health System research makes vital contributions to the development of new and better therapies for the treatment of our patients. Our mission requires that we adhere to high professional standards in conducting clinical research. Atlantic Health System also complies with all relevant statutes and regulations.

Atlantic Health System is committed to protecting the rights of participants in our clinical research. People who participate in clinical research at Atlantic Health System must do so voluntarily. They must be informed about the potential risks and benefits of their participation before they agree to participate. Atlantic Health System protects the privacy and confidentiality of research study participants.

Atlantic Health System has established an Institutional Review Board (IRB)

to fulfill its mandate to protect human research subjects. The IRB consists of members from our medical centers, as well as non-affiliated members.

The IRB has the authority to review and approve, require changes in, and/or disapprove proposed research conducted at any Atlantic Health System facility or otherwise under the auspices of Atlantic Health System. The IRB is required to review and approve all non-exempt research projects at intervals appropriate to the degree of risk, but not less than once a year.

Responsible Conduct of Research

Everyone involved in the research process must follow Atlantic Health System policies on the responsible research conduct of, and guidelines for, investigators in scientific research. This helps to ensure the quality and integrity of our research. Proper research conduct includes, but is not limited to:

Key Policies

- 4-01 Prohibited & Restricted Research
- 4-02 Research Misconduct
- 4-03 Research Financial Conflict of Interest

- The formulation of proposals
- Interactions with physicians, research associates and patients
- Collection and handling of data
- Evaluation of data, peer review and protection and presentation of results

Research involving human subjects must be administered according to institutional policies and federal regulations with a commitment to the highest ethical standards.

Business Conduct

Billing and Coding

One of the most important aspects of Atlantic Health System’s commitment to compliance is our dedication to the preparation and submission of accurate claims for payment to federal and state health care programs.

Team members can bill for only those goods and services actually provided and medically necessary. All claims for payment for services provided by Atlantic Health System must be supported by complete and accurate documentation in the medical record, proper coding based on that record and bills that accurately reflect the coding.

Accurate and timely documentation also depends on the diligence and attention of our clinicians who treat patients in our facilities. Atlantic Health System expects clinicians to provide us with complete and accurate information in a timely manner.

Atlantic Health System should always bill accurately for services rendered in accordance with the law and with its agreements with third-party payers. When team members receive a question from a patient or third-party payer about an invoice or charge, they should promptly address the question,

or refer the matter to the person who is authorized to address it.

The Deficit Reduction Act of 2005 (DRA)

The DRA was enacted to make Medicare and Medicaid Programs more efficient and to bolster enforcement of health care fraud, waste and abuse. Health care entities like Atlantic Health System are required to inform their team members about the federal and state false claims act provisions, penalties, and protections.

In compliance with the DRA, our written policies and annual mandatory training include a review of the general provisions of the whistleblower protections laws and the false claims regulations with respect to preventing and detecting fraud, waste, and abuse. Additionally, team members are required to comply with all federal and state anti-fraud laws and regulations and the DRA.

Anti-Kickback/Bribes

Atlantic Health System strictly prohibits its team members and other service providers from offering, paying, requesting or accepting money or other benefits in exchange for patient referrals, purchases, leases or orders.

Antitrust

Atlantic Health System engages in activities that are subject to state and federal antitrust laws. Generally, these laws prohibit competitors from entering into agreements to fix prices or to reduce price competition. Team members should not provide information about Atlantic Health System’s business to a competitor. In addition, team members are to refrain from engaging in unfair practices that might restrict competition.

Foreign Corrupt Practices Act “FCPA”

The FCPA prohibits organizations and individuals from paying anything of value to a foreign official in an attempt to obtain an improper business advantage. Atlantic Health System complies with the FCPA and requires its vendors to confirm their compliance with the FCPA.

Record Retention

Accurate and complete records are crucial for the continuity of patient care, appropriate and proper billing, and for compliance with regulatory, tax, and financial reporting requirements. A team member who enters information into a medical record, business record, regulatory or financial report has a responsibility to do so in a truthful, accurate, legible and timely manner. Records must be retained by Atlantic Health System, as required by federal and state laws.

Endorsements

Atlantic Health System and its team members cannot express support for or endorse products, services or ventures without prior approval. This includes vendors with whom Atlantic Health System conducts business. Requests or proposals to use Atlantic Health System’s name, logo, likeness or statements for an endorsement must be reviewed and approved by our Endorsements Committee. Vendor requests to include comments, quotes, or referrals from Atlantic Health System

staff, or an Atlantic Health System case study, in any publication or media of any type must also be approved by our Endorsements Committee. This includes press releases, marketing materials, and websites.

Business Partners

Atlantic Health System selects suppliers, vendors, contractors, and consultants based on the quality, price, delivery capabilities and supply of their goods and services. Atlantic Health System obtains these services only when there is a legitimate need for them.

Atlantic Health System examines the background of our business partners before allying with them to ensure they demonstrate high standards of ethical business conduct.

Referrals of Patients

Atlantic Health System does not pay or offer to pay anyone for the referral of patients to Atlantic Health System.

Similarly, Atlantic Health System does not accept payments for patient referrals that our team members make to third parties. When Atlantic Health System discharges patients or refers them to other providers, we ensure that the referrals are based on the patient’s need for the service and the ability of the referral provider to meet that need.

Atlantic Health System’s patients’ freedom to choose a service provider must be honored at all times. Financial

Key Policies

2-08 Anti-Kickbacks

2-03 Record Management

2-03a Record Retention Schedule

4-07 Insider Information

1-08 Screening and Exclusion

2-07 Conflicts, Gifts and Endorsement

6-01 Conflicts/Gifts/Travel/

Endorsements/ Disclosure

relationships with providers with whom Atlantic Health System has a referral relationship are reviewed to ensure compliance with relevant laws.

Gifts

Atlantic Health System does not solicit, accept, make or offer to make any payment, or accept or provide any

other thing of value to another person or company with the understanding or intention that such payment is to be used for an unlawful or improper purpose. Atlantic Health System does not offer or give gifts of any kind to government officials.

“If you think compliance is expensive – try non-compliance.”

- Former U.S. Deputy Attorney General Paul McNutty

Contact Information

Chief Compliance Officer	973-660-3143
Chief Legal Officer	973-660-3179
Director, Corporate Compliance	973-660-3264
Compliance Manager	973-660-3158
Director, Internal Audit	973-660-3134
Director, Clinical Audit	973-660-3114
Privacy Manager	973-660-3178
Protection & Security Services	973-971-8687
Research Compliance Manager	973-660-3554
Manager, IRB	973-660-3128
Employee Resource Center	973-660-3521
Protection & Security Services	973-971-8687
Hotline (Anonymous)	888-213-0837
On-line Reporting (Anonymous)	atlanticealth.alertline.com
Email	compliance@atlanticealth.org
Fax	973-660-9059

Atlantic Health System

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