



POLICY: NON-RETALIATION	MANUAL: CAREPOINT COMPLIANCE
EFFECTIVE DATE:	POLICY NUMBER: CPCOM 003
LAST REVISED DATE: MARCH 2, 2015	PAGE 1 OF 3
PREPARED BY: CAREPOINT COMPLIANCE	

PURPOSE

This policy is designed to provide employees and management of CarePoint Health (Bayonne Medical Center, Christ Hospital, Hoboken University Medical Center, CarePoint Health Medical Group, Quality Care Associates, LLC, McCabe Ambulance, CarePoint Health Management Service Organization) with appropriate guidelines for addressing problems and concerns raised by employees. This policy applies to employee reports that are made through any medium, for example, in-person, through the CarePoint Health Hotline, or in writing via email. These problems/concerns shall include, but not be limited to operational matters, ethical/legal violation or policy infractions.

POLICY

It is the policy of CarePoint Health that positive employee relations and morale can be best achieved and maintained in an environment that promotes ongoing, open communication between supervisors and their employees. Candid discussions of employee problems and concerns are an important part of open communication. CarePoint Health encourages its employees to express their problems, concerns, and opinions on any issue. Through its Corporate Compliance Program, CarePoint Health provides an effective process for employees to express problems, concerns and opinions without fear of retaliation or reprisal.

PROCEDURES

All managers should be instructed to take aggressive measures to assure their staff that CarePoint Health encourages the reporting of problems and concerns, and that employees will not be retaliated against for making such reports.

The following actions will be taken across all CarePoint Health operations on a yearly basis:

- Employees will be notified of the non-retaliation policy upon orientation.
- Compliance will provide the policy and education annually to all managers at a management staff meeting.
- All managers will receive a copy of this Policy along with a brief discussion of the spirit, intent and importance of non-retaliation.
- Senior management will meet with the lower level managers to discuss this policy, including a discussion about the proper treatment of employees and how to create a work environment that fosters open communication.
- All lower-level managers or department heads will personally meet with their employees to discuss this policy. The policy shall be shared annual with employees during their annual training competencies. The policy shall also be part of new employee orientation with the new employees returning a certification form to Human Resources.

Every employee must understand that retaliation in response to a report of a problem or concern is not tolerated under this policy. Reports of retaliation will be investigated thoroughly and expeditiously, with appropriate disciplinary actions taken, up to and including termination of employment.



A. EMPLOYEES

- 1) Employees are required to report any suspected waste, fraud, abuse, mismanagement, violation of law, and violation of CarePoint Health's Code of Business Conduct & Ethics or policies and procedures.
- 2) Concerns regarding any issue should be addressed by CarePoint Health management preferably via (a) an immediate supervisor, (b) the department's manager, (c) the department's administrator, or (d) another senior administrator of the organization
- 3) If for any reason, an employee feels constrained or uncomfortable following the order set forth above, the employee should address his or her concern to the Human Resources Department.
- 4) If an employee's concern or problem cannot be satisfactorily resolved through the methods described above, the employee should address the concern to the Chief Compliance Officer, either directly or through the Compliance Hotline(s) listed below.

Bayonne Medical Center
Christ Hospital
Hoboken University Medical Center
CarePoint Health Medical Group
Quality Care Associates, LLC
McCabe Ambulance
CarePoint Health Management Service Organization

844-246-4365 or Complianceofficer@carepointhealth.org

B. DEPARTMENT DIRECTORS/MANAGERS

1. It is the responsibility of management to promote an "open-door" attitude about employee problems and concerns at all times.
2. Department Directors/Managers shall be receptive to employee concerns, problems and opinions and explore with the employee suggestions for resolving the issue.
3. Department Directors/Managers shall inform the Director of Human Resources of concerns and problems raised by employees that indicate a system or pattern of problems.
4. Department Directors/Managers shall inform the Vice President of Compliance Officer of concerns and problems raised by employees that indicate a system or pattern of problems, particularly those that involve legal or fraud and abuse issues.
5. Department Directors/Managers shall maintain the confidentiality of employee concerns and problems at all times, insofar as legal and practical, informing only those personnel who have a need to know.

C. HUMAN RESOURCES

1. The Director of Human Resources and her/his designees shall provide assistance and guidance to supervisors in receiving and resolving employee concerns, problems and opinions.
2. The Director of Human Resources and her/his designees shall keep administration informed of concerns and problems raised by employees.
3. Depending on the nature of the report, the Chief Compliance Officer may need to be notified prior to beginning an investigation.



4. When the Corporate Compliance Officer is involved, the Director of Human Resources shall assist the CarePoint Health's Corporate Compliance Officer in investigating the matter. If a resolution can be reached, the Corporate Compliance Officer or the Director of Human Resources, as the case may be, shall promptly inform the employee of the results of the investigation and the resolution, if possible.
5. The Senior Vice President of Human Resources and her/his designees shall ensure the confidentiality of the employee raising the concerns and problems at all times, to the extent legal and practical, informing only those personnel who need to know about the concern or problem. The Senior Vice President of Human Resources shall ensure that all new employees have certified they read and understood the non-retaliation policy. This shall occur at all new employee orientation sessions as well as the annual competency