



# Working Together for Quality

Our Code of Ethical Conduct



# A message from our President and Chief Executive Officer

Dear Colleague,

Welcome to the Northwell Health's Code of Ethical Conduct. Why do we have a Code? Our Code demonstrates that we are committed to honesty, integrity and ethical behavior in all aspects of our work. We strive to provide the highest quality patient care, protect patient privacy, and work honestly and fairly with our business partners and government regulators.

Equally important is the commitment we make to each other as colleagues. We are committed to providing a workplace that is free from discrimination, harassment and retaliation. Northwell Health values the contributions of everyone affiliated with our hospitals and facilities.

We are very proud of the many quality awards Northwell Health has received in the past few years. Recently, our hospitals received 68 overall quality awards and a total of more than \$900,000 in financial incentives from the US Centers for Medicare and Medicaid Services' Hospital Quality Improvement Demonstration.

Compliance is an integral part of quality. Unless we follow the rules and comply with all relevant state and federal laws governing healthcare, we cannot continue to provide high quality care. Our Code can help you when you need guidance on compliance-related issues. Northwell Health's policies and procedures tell us how to do our jobs the right way every day.



This Code also establishes the foundation we need to maintain the trust of our patients, members, communities, and employees, as well as those who do business with Northwell Health. The Code provides tools that help ensure that our work is done in an ethical and legal manner. It also contains resources that can help you find assistance when you believe the Code may have been violated. As a condition of your association with Northwell Health, you are required to know the provisions of the Code and to report any activity that may constitute a violation.

If you become aware of any such activity, you should report it immediately to your supervisor, to another member of senior management at your facility, or to the Office of Corporate Compliance at (516) 465-8097. You can also make a confidential report to the Compliance HelpLine, 24 hours a day, 7 days a week, by calling (800) 894-3226 or by visit line. You can make a report anonymously if you choose to do so. You will not experience any retaliation for asking questions or reporting concerns about the Code or about conduct you have observed in the workplace.

Compliance is the responsibility of every member of the Northwell Health community. We expect everyone's professional conduct to reflect the ethical standards set forth in the Code. I need your help and commitment to achieve these important goals. Please join me in working to maintain Northwell Health's reputation as a leader in the healthcare industry and a model of integrity and compliance.

**Michael J. Dowling**  
President and Chief Executive Officer  
Northwell Health

**Michael Dowling**



[Click to see a message from Michael Dowling.](#)

# Our values



**Every moment matters.**  
We're passionate about caring for our patients, our communities and each other, keeping everyone safe and well.



**We never settle.**  
We're pioneers, always curious in our everyday tasks and our quest to shape the future of health care.



**It's our ambitious spark that changes lives.**  
We seek integrity and excellence, while taking every opportunity to spread our wings and redefine what it means to work in health care.



**We rely on each other.**  
We couldn't do it on our own, and trust each other to perform seamlessly as one.



**We are all unique.**  
We stand united, proud and respectful, always celebrating our differences.





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# Our commitment to compliance



 Everyday excellence

# Our commitment to compliance

## The Code of Ethical Conduct

The Code of Ethical Conduct provides guidance for how we can carry out the mission and vision of Northwell Health. The Code reflects Northwell Health's core values.

Our Code provides guidance for you so that you can respond properly when compliance-related issues arise. It is designed to assist you in the performance of your job within appropriate moral, ethical and legal standards. The Code is not intended to cover every situation. Rather, it can help you to make the right decisions or ask the right questions.

The Code and the associated Northwell Health policies and procedures apply to everyone who has a relationship with our organization, including but not limited to:

- Board members
- Officers
- Employed and non-employed staff
- Vendors
- Volunteers
- Consultants and contractors

We also expect all individuals and organizations working on behalf of Northwell Health to adhere to the ethical standards set out in the Code.

We are committed to having an ethical environment at Northwell Health founded on these principles of conduct:

- Treat patients, members, staff and the public with dignity and respect
- Abide by applicable laws, rules, guidelines and procedures
- Behave honestly and fairly and be truthful and accurate in all communications
- Use good judgment and high ethical standards in all business dealings
- Safeguard confidential patient, member, employee health and other private information
- Protect trade secrets, competitive and other business information
- Maintain accurate and timely records
- Strive for mutual respect and trust in work relationships
- Ensure a safe and healthy work environment
- Avoid conflicts of interest
- Guard against theft and misuse of Northwell Health property and other assets
- When in doubt about a situation, ask before acting



## Vital signs

We expect and require everyone affiliated with Northwell Health to perform their job duties and responsibilities in a law-abiding, honest and trustworthy manner.

Everyone at Northwell Health is responsible for maintaining an ethical environment. Your actions in the workplace must demonstrate your commitment to honesty, integrity and accountability every day. Your job performance will be evaluated, in part, based on your compliance with the Code and with Northwell Health's compliance-related policies and procedures.

Certain Northwell Health compliance policies are referenced in this Code. Other compliance policies can be reviewed and downloaded from myIntranet, Northwell Health's intranet site, on the Office of Corporate Compliance web page or obtained from a supervisor in hard copy form.

Please contact the Office of Corporate Compliance whenever you have questions about any compliance-related issue. Northwell Health's Human Resources staff also can provide guidance on workplace issues arising from the Code of Ethical Conduct and/or Northwell Health's policies and procedures.



## Vital signs

You have a duty to know, understand and comply with the requirements of all Northwell Health policies, regardless of whether they are referenced in this Code.





## Northwell Health's Compliance Program

Northwell Health's Compliance Program demonstrates our firm commitment to the highest standards of ethics and compliance.

- The Northwell Health Board of Trustees is responsible for guiding the Compliance Program. The Vice President and Chief Corporate Compliance Officer reports to the Audit and Corporate Compliance Committee of the Board and the full Board on a periodic basis to ensure that the Trustees are fully informed on compliance issues and that transparency exists in the program at all times.
- The Chief Corporate Compliance Officer leads the Office and also reports to the President and CEO of Northwell Health and to the General Counsel.
- Northwell Health also has an Executive Audit and Corporate Compliance Committee consisting of members of senior management and led by the Chief Corporate Compliance Officer. This committee provides direction, oversight and guidance to the Compliance Program.

- The Office of Corporate Compliance carries out the day-to-day implementation of the Compliance Program. The staff of the Office is comprised of a team of ethics and compliance professionals who are experienced in the areas of coding, billing, auditing, ethics and quality.

Please contact the Office of Corporate Compliance whenever you have questions about any compliance-related issue. Northwell Health's Human Resources staff also can provide guidance on workplace issues arising from the Code of Ethical Conduct and/or Northwell Health's policies and procedures.

For more information about Northwell Health's Compliance Program, visit the Office of Corporate Compliance web page on myIntranet.



Find out more

#800.00, Corporate Compliance Program

## Compliance-Related Policies

Northwell Health has a number of policies that support the operation of our compliance program. These policies cover several topics that include, but are not limited to, privacy, security, coding, billing, identifying risk areas, and responding to compliance issues promptly as identified in the course of audits, internal reviews, and Compliance HelpLine inquiries.

Please see a complete listing of our policies in the Compliance resources section at the end of this Code. If you have questions about any of the policies, please contact your supervisor or manager, the Office of Corporate Compliance at (516) 465-8097, the Compliance Director assigned to your facility, or the Chief Corporate Compliance Officer.

## Special responsibilities of supervisors and managers

Northwell Health's supervisors and managers have a special responsibility to set the right ethical tone. Supervisors and managers must:

- Make sure that their work areas reflect Northwell Health's commitment to compliance and quality healthcare
- Create a work environment in which concerns can be raised and openly discussed without fear of retaliation
- Promote honesty and integrity and model it for others

## Discipline

Anyone employed by Northwell Health who violates the Code or related policies and procedures will be subject to disciplinary action. The discipline imposed will be determined on a case-by-case basis and will depend upon the nature, severity and frequency of the violation.

Possible disciplinary actions include:

- Verbal warning
- Written warning
- Suspension
- Termination of employment

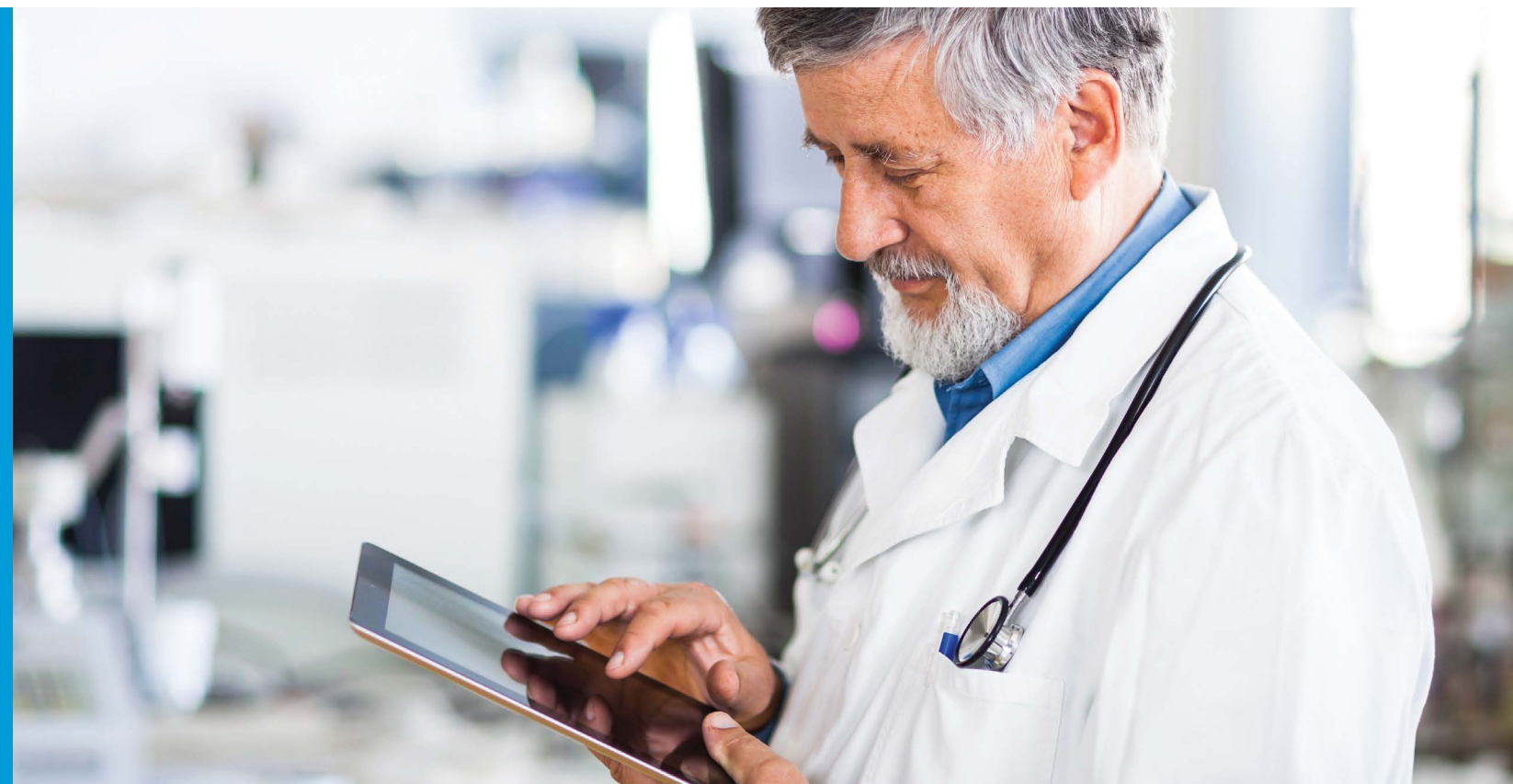


Vital signs

The disciplinary policy will be firmly and fairly enforced with respect to all persons affiliated with Northwell Health.



# Duty to comply and report



 Integrity first

# Duty to comply and report

## Making ethical decisions

When you're unsure of what to do in a given situation, ask yourself:

Is it ethical?



Is it consistent with our Code, policies, the law and our core values?



Is it in the best interest of our company, patients and members?



Would you feel comfortable if it were shared publically?



If you answered "yes" to the questions above, then it is probably okay to move forward. If you answered "no" or if you are unsure, stop and seek help before proceeding.

## Reporting obligations

It is the duty of every trustee, officer, employee and all other individuals affiliated with Northwell Health to comply fully with all governing laws, regulations, Northwell Health policies and procedures and the Code. Everyone must offer their complete cooperation with any investigation by Northwell Health and/or governing authorities.

You are required to report to the Office of Corporate Compliance or the Compliance HelpLine any actual or suspected violations of the Code, Northwell Health's policies and procedures and/or federal or state law. You also must report any other compliance-related issues, including but not limited to, conflicts of interest, patient privacy and security, fraud or other misconduct of any type relating to Northwell Health's operations.

## Consequences for not reporting potential compliance issues

The failure to comply with the laws and/or to report suspected violations of state or federal law can have very serious consequences for Northwell Health and for any affiliated individual who fails to comply or report. The individual may be terminated from employment (or from his/her contractual arrangement with Northwell Health) or be subject to other disciplinary measures, depending on the nature of the violation.

Ensuring compliance with the many laws, rules, regulations and industry standards that govern the operations of Northwell Health requires teamwork. For this effort to be successful, everyone who is employed by or affiliated with Northwell Health must work together.



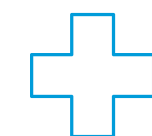
## Vital signs

Even if an employee expresses criticism or raises an uncomfortable question, supervisors and managers must welcome the communication, always remembering that openness is essential to a healthy work environment.



## Vital signs

We need your help to continue to act with honesty and integrity.



## Check-up

### How do I report a compliance-related concern?

You can call the HelpLine at (800) 894-3226 or report online at [Northwell.ethicspoint.com](https://www.northwell.ethicspoint.com). You also can report the matter directly to the Office of Corporate Compliance at (516) 465-8097 or to your supervisor or another manager in your facility.



## Check-up

### Can I be retaliated against for participating in an investigation as a witness?

No. Northwell Health does not permit retaliation against anyone for good faith and honest participation in an internal or external investigation. Everyone affiliated with Northwell Health is expected to cooperate with all investigations.

## Non-retaliation and non-intimidation

Northwell Health prohibits anyone from retaliating against or intimidating an employee who discloses a compliance concern. Northwell Health will immediately investigate and take appropriate action with respect to all suspected acts of retaliation or intimidation. Any individual who is found to have retaliated against an employee or intimidated an employee will be subject to immediate discipline, up to and including termination of employment.



Find out more

#800.01, “Non-Intimidation and Non-Retaliation”

#800.09, “Detecting and Preventing Fraud, Waste, Abuse and Misconduct”

#800.08, “Compliance HelpLine”

Northwell Health Human Resources Policy Part V, Section 3, “Employee Conduct in the Workplace/ Progressive Discipline”



## Vital signs

We do not to retaliate in any manner against an individual who reports a potential compliance problem or violation of law in good faith.

## Responding to potential compliance issues

Northwell Health is committed to investigating all reported concerns promptly, thoroughly and confidentially, to the extent possible and appropriate. The Chief Corporate Compliance Officer directs the investigation of compliance concerns. Where an internal investigation substantiates a reported violation, we initiate corrective actions or other changes that need to be made in order to remedy the problem.

These actions can include:

- Making prompt repayment of any government funds to which we are not entitled
- Notifying the appropriate government agency
- Instituting disciplinary action
- Implementing systemic changes to prevent a reoccurrence of the problem

## Deficit Reduction Act of 2005 – The False Claims Acts

Under the Deficit Reduction Act of 2005, any employer who receives more than \$5 million per year in Medicaid payments is required to provide information to its employees about:

- The Federal and New York State False Claims Acts
- The rights of employees to be protected as whistleblowers
- The employer’s policies and procedures for detecting and preventing fraud, waste and abuse

The Acts also impose liability on individuals who knowingly submit a false record in order to obtain payment from the government or who obtain money from the federal government to which he or she is not entitled and then uses false statements or records in order to retain the money.

The Acts permit private parties to bring actions to recover money on behalf of the United States and to share in a percentage of the proceeds obtained by the government. Persons who bring these actions are protected against retaliation.



## Vital signs

The Federal and New York State False Claims Acts impose liability on any person who submits a claim to the federal government that he or she knows to be false.

Examples of false claims include:

- Billing for a higher level of services than were actually performed
- Billing for services that were not medically necessary
- Billing multiple codes instead of one for a drug panel test to increase reimbursement
- Submitting a claim under one patient’s name when services were provided to another person
- Altering claim forms or medical records
- Billing for services provided by an unlicensed provider
- Failing to repay overpayments within 60 days after identification
- Submitting false or inaccurate pricing or rebate information on pharmaceuticals to a Federal health care program
- Enrolling a beneficiary in a Medicare Advantage program without the beneficiary’s consent



Find out more

#800.09, “Detecting and Preventing Fraud, Waste, Abuse and Misconduct”



# Our commitment to our patients and members



 Building trust



# Our commitment to our patients and members

## High quality patient and member care

Northwell Health's number one priority is the delivery of the highest quality of care possible. Our main concern is for the well-being, comfort and dignity of our patients and members. We do not make a distinction in the availability of services or the care we provide based on age, gender, disability, race, color, religion, national origin, actual or perceived sexual orientation, marital status, veteran status or based on the source of payment for the patient or member's services or the patient or member's ability to pay.

- We treat all of our patients and members equally with compassion, understanding and respect.
- We provide only that care which is medically necessary and appropriate.
- All clinical decisions are based upon identified health care needs regardless of how Northwell Health compensates or shares financial risk with any individual or entity.



### Vital signs

Our commitment to quality of care and patient and member safety is an obligation of every person affiliated with Northwell Health.

## Patient and member choice

All patient care at Northwell Health is administered in accordance with the [Patient's Bill of Rights in New York State](#). Every patient is provided with a statement of these rights and with a Notice of Privacy Practices. [These patient rights include:](#)

- The right to make decisions regarding medical care
- The right to refuse or accept treatment
- The right to informed decision-making
- Rights related to how the patient's health information is used and maintained by Northwell Health

We are responsible for informing patients about their proposed plan of care, including the risks, benefits and alternatives available to them. We respect patients' rights to make informed decisions about treatment, as well as to establish and have followed advance directives. Patients are free to choose their service providers, including but not limited to, physicians and ancillary service providers such as home health, home infusion and durable medical equipment suppliers.



### Vital signs

We listen to and follow the choices made by our patients and members with respect to their clinical care, as required by law.





## Emergency treatment (EMTALA)

We follow the Emergency Medical Treatment and Active Labor Act (EMTALA) in providing an emergency medical screening examination and necessary stabilization to all persons who present themselves for emergency care, regardless of ability to pay or any other discriminatory factor. Patients with emergency medical conditions are transferred to another facility at the patient's request or if the patient's medical needs cannot be met at Northwell Health facilities because we do not have the capacity or capability to do so. Patients must consent to any transfer and all transfers are accomplished in strict compliance with state and federal EMTALA regulatory and statutory requirements.

### EMTALA



[Click to see a message from our Chief Quality Officer.](#)

## Safeguarding patient and member information

We demonstrate our respect for our patients and members by protecting the confidentiality of all personal information they share with us for the purpose of receiving quality medical care. This information, known as "Protected Health Information" or "PHI," can include:

- Names
- Addresses
- Phone numbers
- Social Security numbers
- Medical diagnoses
- Family illnesses
- Other personal information

Federal and state laws, as well as quality of care standards, require us to keep this information confidential. Northwell Health employees or members who are patients in our facilities also must be accorded the highest level of confidentiality with respect to their medical records and the PHI contained in them.

We must never use, disclose or discuss patient and member specific information except as necessary for patient and member care or as required by law.

If you become aware of an unauthorized disclosure of patient or member information, you must report it immediately to your supervisor or to the Office of Corporate Compliance. Northwell Health prohibits retaliation against any person who makes a good faith report of a privacy violation.

Subject to emergency exceptions, patient and member privacy will be protected and patient and member specific information will be released only to persons authorized by law or by the patient or member's written authorization. For example, it is inappropriate to:

- Discuss patients' or members' cases in a public area where conversation may be overheard by others
- Permit access to a patient's or member's record by individuals who are not involved in legitimate activities relating to the patient or member
- Access employees' medical records when they are receiving medical care at our facilities, unless it is for treatment, payment or health care operations

If you are unsure of the rules governing the release of patient and member related data, ask and be sure you understand them before you release any information.

Anyone affiliated with Northwell Health who engages in unauthorized access or disclosure of patient or member information will be subject to disciplinary action up to and including termination of employment. Individuals also may be subject to civil or criminal penalties.



**May I delay the examination or treatment of an ER patient in a life-threatening situation to obtain financial and demographic information about the patient?**

**No.** Appropriate screening and emergency care must be provided in a timely manner and cannot be delayed while information is obtained from the patient.

### Encryption Snippet



[Click to learn more about safeguarding patient and member information.](#)

### Cyberscam



[Click to learn more about how to be aware of social engineering and phishing that can occur in the workplace.](#)

### Returning Billing Calls



[Click to learn more about returning patient calls.](#)



## Device Security Safeguard



Click to learn more about safeguarding patient and member information.

## Snooping



Click to learn more about our policies regarding access of information.



## Find out more

#800.02, “Release of Protected Health Information for Living Patients”

#800.17, “HIPAA and State Privacy Breach Notification”

#800.42, “Confidentiality of Protected Health Information”

#800.45, “Notice of Privacy Practices”

#800.11, “Identity Theft Prevention Program”

## Patient records

We make every effort to ensure that entries we make into patient or member records are clear and complete and reflect exactly the item or service that was provided to the patient. Northwell Health strives to ensure that our records never include guesswork, exaggeration, or miscoding.

## Research

We conduct research according to the highest ethical standards and in full compliance with federal and state laws and regulations. We are committed to fostering a research environment that promotes the responsible conduct of research.

When we ask patients or members to participate in research projects, we advise them of all alternative treatments available to them and the risks and benefits of the proposed treatments. We want patients and members to make informed decisions as to whether or not to participate in research projects.

If you have any questions about the conduct of research with patients or members, you may contact the The Human Research Protection Program at **(516) 465-1910**.

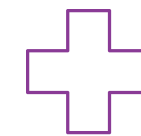
If you wish to report a compliance-related concern about any research being conducted at Northwell Health, you can call the HelpLine 24 hours a day, seven days a week at **(800) 894-3226** or visit [Northwell.ethicspoint.com](https://www.northwell.edu/ethicspoint) online.



## Check-up

### What is an Institutional Review Board (IRB)?

The IRB is a committee of people from various backgrounds, including Northwell Health employees and community members, who are responsible for protecting the rights and welfare of patients and members who participate in research studies.



## Check-up

### What should I do if I observe or suspect misconduct in research?

You must report it immediately to the Research Integrity Officer, Dr. Bettie Steinberg, at (516) 562-1159 or to any Feinstein Institute official, the HelpLine at (800) 894-3226 or online at [Northwell.ethicspoint.com](https://www.northwell.edu/ethicspoint.com) or the Office of Corporate Compliance at (516) 465-8097. Any employee who reports such information in good faith will be protected against retaliation for making the report.

## Responsible conduct of research

Truth, integrity and credibility are critical and distinctive principles of Northwell Health and the Feinstein Institute for Medical Research.

These principles are essential for the progress of scientific research and to preserve the trust of the public in the research community. Northwell Health has set standards and procedures for its researchers in order to preserve truth, integrity and credibility in research, to prevent research misconduct and to deal efficiently and fairly with allegations or other indications of research misconduct.



## Vital signs

We listen to and follow the choices made by our patients and members with respect to their clinical care, in accordance with our Code and as required by law.



## Find out more

#GR051, “Research Misconduct”

#GR053, “Research at Northwell Health”

#GR056, “Research with Human Subjects”

## Credentialing

One important aspect of our commitment to high quality care is the proper credentialing of all health care providers associated with our institutions.

We conduct credentialing reviews for:

- Hospital employees whose work requires licenses
- Temporary and non-employed staff, such as voluntary physicians, visiting physicians, agency-employed nurses, and our provider network

Credentialing reviews occur before the relationship between Northwell Health and an individual commences. We recertify those credentials at regular intervals in accordance with regulatory requirements. We also conduct background checks on individuals who work in our facilities, regardless of whether their position requires a license, to ensure that they do not have criminal backgrounds.



## Vital signs

We ensure that our providers are appropriately credentialed and that their work is within the parameters of their respective licenses.

## Adverse event reporting

New York State law requires us to report to the Department of Health certain adverse patient events within 24 hours after their occurrence. Our health care providers are required to report such incidents to designated Northwell Health administrators immediately upon learning of them. Failure to do so constitutes an unacceptable practice and is grounds for discipline.



## Vital signs

We are committed to the full and prompt investigation of every adverse event and to the implementation of corrective or remedial action where appropriate.

## Marketing and advertising

We market Northwell Health’s services in a fair, truthful and ethical manner and adhere to the applicable federal and state regulatory standards. Our marketing materials are designed to reflect only the services available and the level of the provider’s licensure and accreditation. Northwell Health uses marketing and advertising to educate the public, report to our community, increase awareness of our services and to recruit staff members.



# Our commitment to government regulators



 Accountability and compliance



# Our commitment to government regulators

## Coding and billing

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

Remember:

- All claims for payment for any service provided by Northwell Health must be supported by complete documentation in the medical record, proper coding based on that record and bills that accurately reflect the coding. We bill only for those goods and services actually provided and medically necessary.
- Accurate and timely documentation depends on the diligence and attention of clinicians who treat patients in our facilities. We expect those clinicians to provide us with complete and accurate information in a timely manner.
- Northwell Health should always bill accurately for services rendered in accordance with the law and with its agreements with third party payers. When we receive a question from a patient, member or a third-party payer about an invoice or charge, we promptly address the question, if authorized to do so, or refer the matter to the person who is authorized to address it.

Under federal law, all identified overpayments must be refunded to the government payer within 60 days of identification. Failure to do so can result in fines and other penalties.

### OIG: Coding and Billing



Click to learn more about submitting accurate claims for payments to government healthcare programs.



## Vital signs

We have a zero tolerance policy with respect to billing for improper claims.



## Check-up

**What should I do when I receive a question from a patient, member or a third-party payer about an invoice or a charge on a patient or member's bill?**

You should promptly address the question or issue if it is within your job duties and responsibilities to do so. Unresolved disputes should be referred to your supervisor for resolution.

## Cost reports

Northwell Health receives reimbursement under federal and state health care programs. These programs require us to submit complete and accurate reports of our costs of operation and other information.

These laws, regulations and guidelines define what costs are allowable and outline the appropriate methodologies to claim reimbursement for the cost of services provided to program beneficiaries.



## Vital signs

We comply with all applicable legal, regulatory and program requirements in the preparation of our cost reports.

## Anti-kickback/bribes

Northwell Health strictly prohibits its employees and other service providers from offering, paying, asking for, or accepting money or other benefits in exchange for patient or member referrals, purchases, leases or orders.



## Not-for-profit tax-exempt status

Northwell Health is a tax-exempt entity because of our charitable mission. We provide community benefits that include health care services, medical training, education, research and community outreach activities.

### The Stark Law



[Click to learn more about the Stark Law.](#)

## Antitrust

Northwell Health 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. We should not provide information about Northwell Health's business to a competitor. In addition, we are to refrain from engaging in unfair practices that might restrict competition.



### Vital signs

We must use Northwell Health's resources in a manner that furthers the public good rather than the private or personal interests of any individual or entity.

## 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. Everyone 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 Northwell Health, as required by federal and state laws.

## Response to governmental inquiries

Northwell Health cooperates fully with government inquiries and investigations. We do not prevent persons affiliated with us from speaking with government officials. However, you should contact your supervisor and the Office of Legal Affairs before doing so. When we receive a request for documents or a subpoena, we refer it to the Office of Legal Affairs, which will coordinate our response and ensure that it is appropriate and complete. We never destroy, alter or change Northwell Health records requested by or related to a government investigation.

When we receive notice of an investigation or lawsuit, a request for documents or a subpoena, we preserve all related records and cooperate with the Office of Legal Affairs in making them ready for evaluation and/or production.



### Find out more

#800.48, "Responding to Government Inquiries"

#GR027, "Preparation for an External Regulatory Research Inspection at a Clinical Site"

## Accreditation and surveys

In preparation for, during or after surveys, Northwell Health employees and affiliated persons deal with all accrediting bodies in a direct, open and honest manner. No action should ever be taken in a relationship with an accrediting body that would mislead the accrediting organization or its survey teams, either directly or indirectly.

### OIG: Kickbacks to Physicians



[Click to learn more about kickbacks and fraud.](#)

# Our commitment to our business partners



 High standards



# Our commitment to our business partners

## A shared responsibility

Our business partners – suppliers, contractors, physicians and others with whom we do business – are vital to our success. We always treat them with respect, professionalism and fairness. We examine the backgrounds of our business partners before allying with them to ensure they demonstrate high standards of ethical business conduct.

## Supplier, vendor, subcontractor, attorney and consultant relationships

Northwell Health selects our suppliers, vendors, subcontractors, attorneys and consultants based on the quality, price, delivery and supply of their goods and services. We obtain these services only when there is a legitimate need for them.



## Vital signs

Our patients, members and the community we serve frequently associate our business partners' performance with Northwell Health.

## Referral of patients and members

We do not pay or offer to pay anyone – colleagues, physicians or other persons or entities – for the referral of patients or members. Similarly, we do not accept payments for referrals we make. When Northwell Health discharges patients and refers them to other providers, we ensure that the referrals are based on the patient's documented need for the referred service and the ability of the referral provider to meet that need.

Our patient and member's freedom to choose a service provider must be honored at all times. Financial relationships with providers with whom Northwell Health has a referral relationship are reviewed to ensure compliance with the relevant laws.



## Vital signs

We do not accept any form of compensation that is designed to influence the selection process.





## Gifts and interactions with industry

Northwell Health 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. Northwell Health does not offer or give gifts of any kind to government officials.

All gifts from health care vendors, regardless of value or size, are strictly prohibited. Recent scientific evidence also suggests that certain business practices of pharmaceutical, medical device and similar companies can negatively influence physician decisions and the educational and training experience of students and trainees. As a teaching resource to medical students and trainees, Northwell Health prohibits gifts, improper meals, and other forms of compensation by industry representatives.

### Vendor



[Click to learn more about gifts from industry.](#)



### Find out more

#800.04, "Gifts and Interactions with Industry Policy"

#800.10, "Business Courtesies to Potential Referral Sources"

#GR078, "Review of External Consulting Agreements with Industry"



### Check-up

**One of our vendors wants to attend a community information session being hosted by Northwell Health and provide inexpensive trinkets to the people attending the session. Is this permitted under our Gifts policy?**

No. We cannot accept any gifts from vendors and we do not allow vendors to provide trinkets to anyone in our facilities.





# Our commitment to our colleagues



 Working responsibly

# Our commitment to our colleagues

## Conflicts of interest

We have a duty to avoid conflicts of interest and a duty of loyalty to Northwell Health. Our business conduct must always put Northwell Health's interests ahead of our personal interests.

- We do not use our positions or confidential information obtained in the course of our work for personal gain.
- We make sure that any outside jobs or positions do not conflict with our work at Northwell Health.
- We disclose to our managers and the Office of Corporate Compliance any potential conflict of interest.



### Vital signs

We are obligated to avoid conduct that could create a conflict of interest.

Examples of potential conflicts of interest include:

- Acting as a director, partner, consultant or employee of a firm that provides services, supplies or equipment to Northwell Health or is a competitor of Northwell Health
- Having a material financial interest (or a family member having a financial interest) in a firm that is either a competitor of, or a vendor (or potential vendor) to Northwell Health
- Purchasing or leasing real estate that may increase in value based on knowledge that Northwell Health may have an interest in the property
- Hiring subordinates or Northwell Health vendors to perform personal work for yourself or your family without appropriate administrative approval
- Having your research funded by a company or evaluating a product owned, manufactured or distributed by a company in which you (or a family member) have a material ownership interest or from which you (or a family member) have received significant compensation

Certain members of the Northwell Health community must also file an annual Conflict of Interest Disclosure form. You will be notified if you are required to do so.



## Find out more

#800.03, "Conflicts of Interest and Recusal"

#GR065, "Review and Management of External Interests (COIs) in Research"







## Confidentiality of business data

In addition to patient information, other information created by Northwell Health in the conduct 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 Northwell Health. All data relating to employees, including data generated when employees are patients at Northwell Health facilities, is strictly confidential.

When you receive confidential information in the course of performing your job duties and responsibilities you must not use it for your own or your family's benefit and you may not disclose it to others for their personal use.

Information received by Northwell Health, under an obligation to maintain its confidentiality, is also confidential information which, if you receive such information, is to be utilized only for the purpose for which it was provided, and may not be disclosed in violation of the obligation to maintain its confidentiality.



Find out more

#100.024, "Policy on Intellectual Property"

#GR021, "Research Data Ownership"



Vital signs

We always keep Northwell Health business information confidential and do not use it as a basis for personal gain.

## Substance abuse and impairment in the workplace

Northwell Health works diligently to maintain an alcohol-free and drug-free environment in our facilities.

If we suspect that you are under the influence of drugs or alcohol, you will be required to submit to appropriate drug or alcohol testing. If you are found to be performing any activity for Northwell Health while impaired by or under the influence of alcohol or illegal drugs you will be subject to disciplinary action up to and including termination of your employment.



Vital signs

We are expected to perform our job duties and responsibilities in a professional manner free from the influence of alcohol, drugs or other substances which may impair our job performance or judgment.

## Controlled substances

Pharmaceutical drugs may be handled only by properly authorized individuals who do so as a part of their job duties and responsibilities. You may not under any circumstances divert pharmaceuticals for personal use or sale. You are expected to protect the integrity of Northwell Health by safeguarding the drugs entrusted to you.



Vital signs

If you become aware of any potential lapses in security, or any actual violation of law, policy or regulation relating to drugs, you are required to immediately inform your supervisor or the Office of Corporate Security.



## Non-discrimination and equal employment opportunity

Northwell Health promotes diversity in its workforce at all levels of our organization. We are committed to providing a work environment where everyone is treated with respect, dignity and fairness. We are an equal opportunity employer and do not discriminate on the basis of race, color, creed, religion, gender, national origin, actual or perceived sexual orientation, veteran status, marital status, age or disability.

We comply with all laws, regulations and policies relating to equal employment opportunity in hiring, reductions in force, transfers, terminations, evaluations, recruiting, compensation, promotions and discipline. We make reasonable accommodations to the known physical and mental limitations of qualified individuals with disabilities.



### Vital signs

We celebrate cultural and other differences because they contribute to the strength of Northwell Health.

## Harassment

Northwell Health strives to provide a workplace that is free from harassment and disruptive behavior. Degrading jokes, slurs, intimidation or other harassing conduct are not acceptable at Northwell Health.

Sexual harassment can be particularly harmful to the work environment and is prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with your employment. Verbal and physical harassment or abuse or any other behavior that creates an intimidating, hostile or offensive work environment has no place at Northwell Health. If you engage in this conduct, you will be subject to discipline.

All individuals associated with Northwell Health must treat others with respect, courtesy and dignity and must conduct themselves in an appropriate, professional and cooperative manner.

If you observe or experience any form of harassment or violence, you must report it to your supervisor, the Human Resources Department, a member of management, the Office of Corporate Compliance or the HelpLine at **(800) 894-3226** or by visiting [Northwell.ethicspoint.com](https://www.northwell.edu/ethicspoint.com) online.



### Vital signs

We do not tolerate harassment of any kind especially harassment based on diverse characteristics or the cultural backgrounds of those who work with us.

## Leadership and professionalism

Northwell Health is committed to the highest standards of excellence in the practice of medicine and strongly believes that collaboration, communication and collegiality are essential for the provision of safe and competent patient and member care. Appropriate professional and cooperative behavior means any reasonable conduct intended to advocate for patients, to recommend improvement in patient care and to 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 in the workplace
- The refusal to speak or respond to others
- Inappropriate physical contact
- Sexual, religious, racial or other unlawful harassment
- Throwing objects
- Destruction of Northwell Health property

Violations of the Code of Ethical Conduct by any staff member affiliated with or employed by Northwell Health 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 and the relevant Northwell Health policies. Issues relating to non-credentialed employees will be addressed by the procedures set forth in the “Employee Conduct in the Workplace/Progressive Discipline” Policy.

Anyone who observes or is subjected to inappropriate conduct by any staff member should notify their supervisor, Human Resources, the Office of Corporate Compliance, the HelpLine at **(800) 894-3226** or online at [Northwell.ethicspoint.com](https://www.northwell.edu/ethicspoint.com), the relevant Medical Director and/or Nurse Executive for the facility. Employees who make such reports in good faith cannot be retaliated against for making the report.



### Find out more

#100.76, “Professional Behavior”

Northwell Health Human Resources Policy Part V, Section 3, “Employee Conduct in the Workplace/ Progressive Discipline”



## Health and safety

Northwell Health is committed to providing a workplace that is safe, healthy, smoke-free and in compliance with all applicable laws and regulations.

It is important that you immediately advise your supervisor of any workplace injury or any circumstance presenting a danger of injury so that timely corrective action can be taken to resolve the problem.



### Vital signs

You are expected to know the safety issues and policies that affect your job and to follow those policies at all times.

## Environmental protection

We are to dispose of all waste and other materials and store all chemicals and substances in accordance with applicable laws and regulations. It is important to file all necessary environmental reports accurately and promptly and to cooperate fully with all governmental authorities in the event of an environmental incident. Northwell Health is proud that we have received a number of awards for the green initiatives we have undertaken, including the 2012 “Partner for Change” award from Practice Greenhealth for reducing our waste output.

## Political contributions

We do not use Northwell Health revenues directly or indirectly for political activities or in support of political campaigns. We do not reimburse personal expenses related to any political activities including money spent in support of any political candidate. You may not solicit political contributions from your colleagues in Northwell Health facilities. We do not take positions on political elections or campaigns.

## Use of Northwell Health resources

Each of us is responsible for preserving Northwell Health’s assets including time, materials, supplies, equipment and information. All communications systems including, but not limited to, telephones, computers, electronic mail, intranet, internet and voice mail are the property of Northwell Health and are to be used primarily for business purposes in accordance with our policies.



### Find out more

#900.00, “Computer Use Policy”



## Intellectual property

Northwell Health is committed to adhering to all applicable intellectual property laws. We will respect the intellectual property and copyright laws regarding books, trade journals and other applicable resources. All software used in connection with business must be properly licensed and used in accordance with that license.



### Find out more

Northwell Health Policy, #100.024  
“Policy on Intellectual Property”



### Vital signs

You have no right to privacy with respect to anything you create, store, send or receive on Northwell Health computer and telephonic systems. Northwell Health reserves the right to monitor and/or access all communication usage and contact.





## Screening of excluded individuals and entities

Northwell Health will not knowingly employ, appoint, elect, contract with or bill for any individual or entity that has been listed as debarred, excluded or is otherwise ineligible for participation in federal or state health care programs. We routinely search the lists of excluded and ineligible persons including the U.S. Department of Health and Human Services, Office of Inspector General, the General Services Administration and the New York State Department of Health's exclusion lists.

You are required to report to us if you become excluded, debarred or ineligible to participate in federal or state health care programs or have been convicted of a criminal offense related to the provision of health care items or services.



### Vital signs

Think before you act and protect patient and member privacy.



### Find out more

Northwell Health Human Resources Policy Pt. XIII, Section 11, "Social Media Acceptable Use"

## Media relations

All requests from reporters or the general public for information should be referred to the Public Relations Department at **(516) 465-2600**. Employees should never release information without the permission of the Public Relations Department.

## Responsible use of social media

Protected health information, employee health information and confidential business information (such as Northwell Health business plans) must not be posted on Facebook, Twitter or any other social media site, unless specific advance written permission is obtained from the Office of Public Relations.

### Social Media



Click to learn more about protecting health information when using social media.





# Compliance resources



 Answers and guidance

# Compliance resources

## The Office of Corporate Compliance

The Office of Corporate Compliance is located at 200 Community Drive, Great Neck, NY. Office hours are 9 am to 5 pm, Monday through Friday. Walk-ins are welcome or you can call to make an appointment. The office can be contacted at **(516) 465-8097** or by fax at **(516) 465-8996** during regular working hours.

## Corporate Compliance Office

**Greg Radinsky**  
Senior Vice President & Chief Corporate Compliance Officer  
Email: [GRadinsk@northwell.edu](mailto:GRadinsk@northwell.edu)  
Phone: (516) 465-8327

**Melissa McCarthy**  
AVP, Deputy Chief Corporate Compliance Officer  
Email: [MAlexand@northwell.edu](mailto:MAlexand@northwell.edu)  
Phone: (516) 465-8081

**Brenda Tirsun**  
Specialist, Conflict of Interest  
Email: [BDweck@northwell.edu](mailto:BDweck@northwell.edu)  
Phone: (516) 465-3274

**Laura Vigliotti**  
Senior Executive Assistant  
Email: [LVigliotti1@northwell.edu](mailto:LVigliotti1@northwell.edu)  
Phone: (516) 465-1883

## Compliance Audit

**Debbie Bohr**  
Director, Corporate Compliance Audit  
Email: [DMeade@northwell.edu](mailto:DMeade@northwell.edu)  
Phone: (516) 465-3105

**Stephen Holloway**  
Senior Coding Auditor  
Email: [Sholloway@northwell.edu](mailto:Sholloway@northwell.edu)  
Phone: (516) 574-3160

**Elizabeth Barone**  
Specialist, Corporate Compliance  
Email: [EBarone@northwell.edu](mailto:EBarone@northwell.edu)  
Phone: (516) 465-1877

## HIPAA Privacy and Security

**Kimberly White**  
AVP, Corporate Privacy Officer  
Email: [KWhite6@northwell.edu](mailto:KWhite6@northwell.edu)  
Phone: (516) 465-1889

**Debbie Wright**  
Director, HIPAA Security Program  
Email: [DWright3@northwell.edu](mailto:DWright3@northwell.edu)  
Phone: (516) 465-8858

**AnnaMarie Amato**  
Specialist, HIPAA Compliance  
Email: [AAmato@northwell.edu](mailto:AAmato@northwell.edu)  
Phone: (516) 465-8844



# Compliance Directors & Privacy Officers

## North Shore University Hospital, Plainview, Syosset Hospitals, Corporate & Northwell Health Physician Partners

Contact: **Jennifer Fromkin**  
 Title: Compliance Director & Privacy Officer  
 Email: [Jfromkin@northwell.edu](mailto:Jfromkin@northwell.edu)  
 Phone: (516) 465-1835

## MEETH, Lenox Hill, Northwell Health Physician Partners & Lenox Hill Greenwich Village

Contact: **Louis DiGiovanni**  
 Title: Compliance Director & Privacy Officer  
 Email: [LDiGiovann@northwell.edu](mailto:LDiGiovann@northwell.edu)  
 Phone: (516) 465-3224

## LIJ Medical Center, Steven and Alexandra Cohen Children’s Medical Center, Joint Ventures & Northwell Health Physician Partners

Contact: **Janice Stewart**  
 Title: Compliance Director & Privacy Officer  
 Email: [JStewart2@northwell.edu](mailto:JStewart2@northwell.edu)  
 Phone: (718) 470-4311

## Northern Westchester Hospital, Phelps Memorial Hospital & Northwell Health Physician Partners

Contact: **Eric Sandhusen**  
 Title: Compliance Director & Privacy Officer  
 Email: [ESandhusen@northwell.edu](mailto:ESandhusen@northwell.edu)  
 Phone: (516) 465-3007

## DSRIP, CEMS, LIJ Forest Hills, LIJ Valley Stream, ACO & Northwell Health Physician Partners

Contact: **Aaron Lund**  
 Title: Compliance Director & Privacy Officer  
 Email: [ALund@northwell.edu](mailto:ALund@northwell.edu)  
 Phone: (516) 465-3267

## Huntington Hospital & Northwell Health Physician Partners

Contact: **Donna Angiulo**  
 Title: Compliance Director & Privacy Officer  
 Email: [DAngiulo@northwell.edu](mailto:DAngiulo@northwell.edu)  
 Phone: (631) 351-4171

## Glen Cove Hospital, Northwell Health Physician Partners, OPTUM 360, & Regional Care Recovery

Contact: **Elizabeth Lotito**  
 Title: Compliance Director & Privacy Officer  
 Email: [Elotito@northwell.edu](mailto:Elotito@northwell.edu)  
 Phone: (516) 465-1811

## Northwell Health Laboratories & Northwell Health Physician Partners

Contact: **Jennifer Small**  
 Title: Compliance Director & Privacy Officer  
 Email: [JSmall5@northwell.edu](mailto:JSmall5@northwell.edu)  
 Phone: (516) 465-7994

## STARS, Stern & Orzac CECR, Home Care, Hospice, Region Care & Northwell Health Physician Partners

Contact: **Patricia Cooper**  
 Title: Compliance Director & Privacy Officer  
 Email: [PCooper2@northwell.edu](mailto:PCooper2@northwell.edu)  
 Phone: (516) 465-1822

## Joint Ventures & Northwell Health Physician Partners

Contact: **Maria Joseph**  
 Title: Compliance Director & Privacy Officer  
 Email: [MJoseph37@northwell.edu](mailto:MJoseph37@northwell.edu)  
 Phone: (516) 465-7937

## Northwell Health Physician Partners

Contact: **Sarah Putney**  
 Title: Compliance Director & Privacy Officer  
 Email: [SPutney@northwell.edu](mailto:SPutney@northwell.edu)  
 Phone: (516) 465-3089

## The Zucker Hillside Hospital, The Long Island Home & Northwell Health Physician Partners

Contact: **Dara Goldstein**  
 Title: Compliance Director & Privacy Officer  
 Email: [DGoldstein@northwell.edu](mailto:DGoldstein@northwell.edu)  
 Phone: (516) 465-1821

## Peconic Bay Medical Center, Southside Hospital & Northwell Health Physician Partners

Contact: **Jonathan Dreyfuss**  
 Title: Compliance Director & Privacy Officer  
 Email: [JDreyfuss@northwell.edu](mailto:JDreyfuss@northwell.edu)  
 Phone: (516) 465-1942

## Westchester Health Associates

Contact: **Hester Beukes**  
 Title: Compliance Director & Privacy Officer  
 Email: [HBeukes@northwell.edu](mailto:HBeukes@northwell.edu)  
 Phone: (914)-401-8045

## CareConnect Insurance Co, Inc., North Shore-LIJ Health Plan, Inc.

Contact: **Erin Murphy**  
 Title: Compliance Director & Privacy Officer  
 Email: [EMurphy2@nsljcc.com](mailto:EMurphy2@nsljcc.com)  
 Phone: (516) 405-7515

## Contact: Mary Chaber

Title: Privacy and Special Investigations Unit Officer  
 Email: [MChaber@nsljcc.com](mailto:MChaber@nsljcc.com)  
 Phone: (516) 405-7514

## Staten Island University Hospital, PPS

Contact: **Regina Bergren**  
 Title: Compliance Officer  
 Email: [RBergren@statenilandpps.org](mailto:RBergren@statenilandpps.org)  
 Phone: (718) 226-4572

## Staten Island University Hospital

Contact: **Michael Scognamiglio**  
 Title: Compliance Director & Privacy Officer  
 Email: [Mscognamiglio@northwell.edu](mailto:Mscognamiglio@northwell.edu)  
 Phone: (718) 226-4630

## Contact: Robert Abramson

Title: Compliance Audit Manager  
 Email: [Rabramson1@northwell.edu](mailto:Rabramson1@northwell.edu)  
 Phone: (718) 226-5029

## Contact: Elaine Burke

Title: Compliance Specialist  
 Email: [Eburke4@northwell.edu](mailto:Eburke4@northwell.edu)  
 Phone: (718) 226-1919

## Contact: Michele Bonomo

Title: Compliance Specialist  
 Email: [Mbonomo1@northwell.edu](mailto:Mbonomo1@northwell.edu)  
 Phone: (718) 226-4859

# The Compliance HelpLine

The Compliance HelpLine is available 24 hours a day, seven days a week. Compliance HelpLine callers may remain anonymous and those who choose to give their name will have their identities protected to the extent allowed by law. The Compliance HelpLine has multi-lingual operators who can take reports from individuals whose first language is not English. The Compliance HelpLine can be reached by calling **(800) 894-3226** or by visiting [Northwell.ethicspoint.com](http://Northwell.ethicspoint.com) online.

## The Office of Research Compliance

The Office of Research Compliance (ORC) provides comprehensive regulatory guidance to the research community, and is responsible for oversight of research throughout Northwell Health to ensure the responsible conduct of research. This includes the development of training and education, auditing and monitoring, and distribution of policies, procedures and standards of conduct that promote adherence to applicable laws, regulations and institutional policy.

The ORC is located at 3333 New Hyde Park Rd., Suite 317, New Hyde Park, NY 11042. You can call the general number (516) 321-2101 or email: [orc@northwell.edu](mailto:orc@northwell.edu) for questions or to request consultations.

The ORC staff members are:

### ORC Staff

**Emmelyn Kim, MA, MPH, CCRA, CHRC**  
AVP, Research Compliance and Privacy Officer  
Email: [ekim@northwell.edu](mailto:ekim@northwell.edu)  
Phone: (516) 321-2108

## External Interests (COI) Compliance Division

**Scott Beardsley**  
Research Compliance Manager  
Email: [sbeardsley@northwell.edu](mailto:sbeardsley@northwell.edu)  
Phone: (516) 321-2119

**Gerry Kassoff**  
Research Compliance Manager  
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Phone: (516) 321-2116

## Quality Assurance Division

**JiYoung Choi, CCRP, RQAP-GCP**  
Research Compliance Manager  
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**Stephen Frattini, DVM**  
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**Hamangi Patel, MSW, CCRP**  
Research Compliance Manager  
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Phone: (516) 321-2110

**Alison Powell, LATG**  
Research Compliance Manager  
Email: [apowell6@northwell.edu](mailto:apowell6@northwell.edu)  
Phone: (516) 321-2115

## Regulatory Affairs Division

**Sharon Hochman, MA**  
Clinical Research Monitor  
Email: [shochman@northwell.edu](mailto:shochman@northwell.edu)  
Phone: (516) 321-2121

**Ji-Eun Kim, RPh, PhD**  
Research Pharmacist  
Email: [jkim31@northwell.edu](mailto:jkim31@northwell.edu)  
Phone: (516) 321-2131

## Contact the ORC for Assistance

**ORC**  
Email: [orc@northwell.edu](mailto:orc@northwell.edu)  
General Line: (516) 321-2101  
Website: [www.northwell.edu/](http://www.northwell.edu/)

## The Office of Legal Affairs

The on-call attorney in the Office of Legal Affairs can be reached 24/7 by calling:

Phone: **(516) 321-6650** 9am – 5pm  
Phone: **(516) 321-6649** 5pm – 9am

## Compliance publications

All publications listed below are available on the Corporate Compliance web pages on myIntranet. Click on “Policies and Forms.”

- Conflict of Interest Brochure
- FAQs for Conflict of Interest and Recusal
- FAQs for Gifts and Interactions with Industry
- Gifts and Interactions with Industry Brochure for Employees

## Office of Corporate Security

Phone: **(516) 321-6900**

## Information Security

**Kathy Hughes**  
VP, Chief Information Security Officer  
Email: [khughes@northwell.edu](mailto:khughes@northwell.edu)  
Phone: (631) 414-1413

## Acknowledgment

Northwell Health requires board members, employees, medical staff and applicable business partners to sign an acknowledgment confirming that they have received and read the Code of Ethical Conduct, understand its contents and agree to abide by the spirit and intent of the Code.

If you have any questions regarding the Code or the policies referenced within the Code, please contact your supervisor or manager, the Office of Corporate Compliance at (516) 465-8097, the Compliance Director assigned to your facility, or the Chief Corporate Compliance Officer.

## Detachable wallet card

### Corporate compliance program

- Adhere to the Code of Ethical Conduct.
- Treat patients, members and staff with dignity and respect.
- Obey applicable laws, rules and regulations.
- Behave honestly.
- Do not use confidential information for personal gain.
- Keep accurate and timely records.
- Maintain all patient and member information as confidential.
- Ensure a safe and healthy work environment.
- Avoid personal conflicts of interest.
- When in doubt about a situation, ask before acting.



## Compliance-related policies

### General compliance policies

#800.00 – “Corporate Compliance Program”

#800.01 – “Non-Intimidation and Non-Retaliation Policy”

#800.03 – “Conflict of Interest and Recusal”

#800.04 – “Gifts and Interactions with Industry”

#800.05 – “Screening of Federal and State Exclusion Lists”

#800.06 – “Corporate Compliance Investigative Resolution Process”

#800.07 – “Compliance with Government-Funded Healthcare Claims and Cost Reporting Requirements”

#800.08 – “Corporate Compliance Helpline”

#800.09 – “Detecting and Preventing Fraud, Waste, Abuse and Misconduct”

#800.10 – “Business Courtesies to Potential Referral Sources

#800.12 – “Potential Referral Sources”

#800.14 – “Office Space and Equipment Leases with Physicians and Other Potential Referral Sources”

#800.16 – “Professional Courtesies”

#800.20 – “Physician Signature Requirements”

#800.21 – “Physicians at Teaching Hospitals (PATH) Supervision and Billing Policy”

#800.49 – “Inpatient and Outpatient Facility and Professional Coding Compliance Policy”

#800.50 – “Billing Compliance Policy”

#800.61 – “Insider Trading Policy”

# 700.01 – “Emergency Treatment, Stabilization, Transfer of Patients and EMTALA (Emergency Medical Treatment and Active Labor Act)”

#800.48 – “Responding to Government Inquiries”

### HIPAA privacy policies

#800.02 – “Release of Protected Health Information for Living Patients”

#800.11 – “Identity Theft Prevention Program”

#800.15 – “Patient’s Right to Request Accounting of Disclosure of Protected Health Information”

#800.17 – “HIPAA and State Privacy Breach Notifications”

#800.18 – “HIPAA Privacy and Security Officer Designation”

800.19 - HIPAA Business Associate Policy

#800.42 – “Confidentiality of Protected Health Information”

#800.43 – “HIPAA Marketing and Sale of Protected Health Information Policy”

#800.44 – “Patient’s Request to Inspect a Medical Record”

#800.45 – “Notice of Privacy Practices”

#800.46 – “Patient’s Rights to Request Confidential Communications and Disclosure Restrictions of PHI”

#800.47 – “Disposal Policy for Protected Health and Confidential Health System Information”

#800.51 – “Release of Protected Health Information (e.g. Medical Record) for Deceased Patients”

#800.52 – “Release of Protected Health Information for (e.g. Medical Record) for Living AIDS HIV Patients”

#800.53 – “Release of Protected Health Information for Living Mental Health Patients”

#800.54 – “Release of Protect Health Information for Minors”

#800.55 – “Release of Drug and Alcohol Abuse PHI (e.g. Medical Record) for Living Patients”

#800.56 – “Special Provisions for the Release of PHI for Student Immunizations”

#800.57 – “Removal of Protected Health Information from Health System Facilities”

#800.58 – “Facility Directory Opportunity to Agree or Object (Opt-Out)”

#800.62 – “Release of Protected Health Information for Skilled Nursing Facilities”

#800.63 – “Copy and Paste Notes in the Electronic Medical Record”

#100.80 – “Patient Solicitation Policy”

#100.99 – “Facility Access Controls for Protected Health Information (PHI) and Electronic Health Information (ePHI)”

# Compliance-related policies

## HR compliance related policies

Northwell Health Human Resources Policy Part V, Section 3, Employee Conduct in the Workplace/ Progressive Discipline

Northwell Health Human Resources Policy Pt. XIII, Section 11, Social Media Acceptable Use

#100.76-Professional Behavior

## IT security compliance related policies

#100.97 – “Records Retention and Destruction”

#100.99 – “Facility Access Controls for Protected Health Information (PHI) and Electronic Protected Health Information (ePHI)”

#900.00 – “Computer Use Policy”

#900.01 – “Internet, Cloud, Instant Messaging and Other Web Services Usage Policy”

# 900.03 – “Cellular and Smart Phone Purchase and Usage Policy”

# 900.06 – “Anti-Virus Policy”

# 900.07 – “OCIO IS Investigation Support Services Policy”

# 900.08 – “Remote Access Policy”

# 900.10 – “User Password Policy”

# 900.11 – “Electronic Mail Acceptable Use”

# 900.11A – “Email Communication with Patients Consent-Final Final”

# 900.12 – “Data Classification and Handling Policy”

# 900.14 – “IS Asset Theft Reporting Procedure”

# 900.15 – “Wireless Policy”

# 900.16 – “Information Technology Risk Management Policy”

# 900.19 – “Computer Security Response and Management Policy”

# 900.20 – “OCIO Security Awareness and Training Program”

# 900.24 – “Information Services Disaster Recovery Policy”

# 900.25 – “Data Encryption and Integrity Policy”

# 900.26 – “Device and Media Control Policy”

# 900.27 – “Information System Review and Audit Controls Policy”

# 900.28 – “Procurement and Registration of Computer Equipment and Software Policy”

# 900.29 – “Equipment Disposal Policy”

## Research compliance policies

#GR051 – “Research Misconduct”

#GR053 – “Research at the Northwell Health”

#GR056 – “Research with Human Subjects (IRB Approval)”

#GR027 – “Preparation for an External Regulatory Research Inspection at a Clinical Site”

#GR078 – “Review of External Consulting Agreements with Industry for Researchers”

#GR065 – “Review and Management of External Interests (COIs) in Research (Individuals)”

#100.024 – “Policy on Intellectual Property”

#GR021 – “Research Data Ownership”

#GR080 – “Human Subject Research Oversight and Monitoring”

#GR082 – “Review and Management of Institutional Financial Conflict of Interest in Research”

#GR094 – “Access, Use and Disclosure of Protected Health Information for Research”

#GR097 – “IND/IDE Sponsor-Investigator Responsibilities”

#GR042 – “Maintenance of Human Subject Research Regulatory Documentation”

#GR052 – “Maintenance, Storage, and Archiving of Human Subject Research Data”

#GR049 – “Medications and Investigational New Drugs Used in Clinical Research”

#GR050 – “Use of Controlled Substances in Research”

## Legal related policies

#100.97 – “Records Retention and Destruction”