

Code of Ethical Conduct



Code of Ethical Conduct

Introduction

For more than one hundred years, Cooper University Hospital has been dedicated to providing high-quality, comprehensive medical care to its patients. We continually strive to carry forth our mission of an academic medical center committed to world-class patient care, education, and research, resulting in a healthier community. In achieving this mission, we pledge to act ethically and in compliance with all applicable laws and regulations.

Every member of The Cooper Health System has been placed in a position of trust,—by our patients, by our organization, and by our community. That trust demands an unyielding commitment to ethical decision-making at all times. We must recognize that Cooper’s strength will always rest upon the solid foundation formed by our conduct and behavior as individuals committed to acting ethically, honestly, and with integrity in all that we do.

This Code of Ethical Conduct is an essential component of our Compliance Program and is intended to provide commonsense, guiding principles to be applied each and every day. It is central to continuing and strengthening a systemwide environment that is committed to doing what is right.

Of course, no code of conduct can substitute for integrity, candor, good judgment, and common sense by the individual. In that very real sense, Cooper’s long-term commitment to the principles embodied here rests with all of us. If you reasonably feel that Cooper’s standards are being compromised, it is your obligation as a member of the Cooper team to correct the problem. Utilize the many resources that are provided to you, such as consulting with a supervisor; seeking help from our Compliance, Legal, or Human Resources Departments; or contacting our Compliance Hotline (1.800.500.0333 or CooperHealth.alertline.com) to ensure that Cooper realizes its high standards. Reports can be made anonymously and always without fear of retaliation.

Thank you for your commitment to excellence and to the fundamental principles embodied in this Code.

Very truly yours,



George E. Norcross, III
*Chairman
The Cooper Health System*



Kevin O'Dowd, JD
*Co-President & Chief Executive Officer
Cooper University Health Care*



Anthony Mazzarelli, MD, JD, MBE
*Co-President & Chief Executive Officer
Cooper University Health Care*



Leslie Gordon
*Audit, Ethics and Compliance Committee Chair
The Cooper Health System*

Compliance Program Overview	Cooper Compliance Program	2
	Cooper Compliance Department	2
	Scope of the Compliance Program	2
	Obligations of All Cooper Representatives	2
	Special Responsibility of Leaders	2
Our Code of Ethical Conduct	Overview	3
	General Principles	3
	Ethical Business Conduct	3
	Caring for Our Patients	3
	Communicating With Our Patients	3
	Making Medical Decisions	3
	Ethics in Research	4
	Respecting Privacy Rights	4
	Reporting Adverse Events and Near Misses	4
	Collecting Payments	4
	Respect for Our Workplace	5
	Maintaining a Positive and Constructive Workplace	5
	Commitment to a Drug-Free Workplace	5
	Controlled Substances	5
	Ensuring Environmental Safety	5
	Political Activities	6
	Honesty in Record Keeping	6
	Medical Records	6
	Financial Records	6
	Reports to Outside Entities	6
	Record Retention	6
	Integrity in Billing	7
	Accurate and Truthful Billing	7
	Special Rules for Teaching Hospitals	7
	False Claims Laws	7
	Subcontractors: Billing and Coding Vendors	7
	License and Certification Renewals	7
	Dealing with Accrediting Bodies	8
	Interaction With Outside Entities	8
	Referrals	8
	Marketing	8
	Fair Competition	9
	Protecting Cooper's Resources	9
	Safeguarding Assets	9
	Electronic Communications	9
	Copyrights	9
	Confidential Business Information	9
	Avoiding and Resolving Conflicts	10
	Duty to Avoid Conflicts	10
	Specific Conflict of Interest Policies	10
	Gifts, Entertainment, and Promotional Items	10
	Interactions With Vendors	10
	Grateful Patients, Families, or Friends	11
	Education and Training	11
	Learning About Compliance	11
	Acknowledgement	11
	Disciplinary Action	12
	Disciplinary and Remedial Action	12
	Raising Questions, Reporting Concerns	12
	How to Report Concerns	12
	Whistleblower Protections	12

Compliance Program Overview



Cooper Compliance Program

The Cooper Health System (“Cooper”) Compliance Program was created to promote and sustain Cooper’s commitment to provide high-quality medical services consistent with high standards of business ethics and in compliance with applicable law. This Code of Ethical Conduct is distributed as part of the Compliance Program.

The Compliance Program provides a means to communicate all policies and procedures for ethical conduct and compliance to Cooper employees and those who conduct business with and on behalf of Cooper. It contains detailed policies that govern conduct undertaken in connection with Cooper, methods used by Cooper to measure and assess compliance, and procedures to respond to noncompliant conduct.

Cooper Compliance Department

The Chief Compliance Officer and the Compliance Department oversee the implementation of the Compliance Program. The Chief Compliance Officer reports to the Board of Trustees’ Audit, Ethics and Compliance Committee, comprised of at least two members of the Board and up to five additional members.

Members of the Compliance Department serve as a resource for anyone with questions or concerns about how Cooper is conducting business. Members of the Compliance Department provide education on compliance issues both through the Cooper Learning Network and through live training.

The Compliance Department is available to receive reports of any conduct that may be a violation of law or regulation, or that conflicts with Cooper’s Code of Ethical Conduct, policies, or procedures. Reports received through the Compliance Department may be made anonymously through the Compliance Hotline (1.800.500.0333 or CooperHealth.alertline.com) and are investigated with due care and sensitivity.

Scope of the Compliance Program

The Compliance Program and this Code of Ethical Conduct apply to everyone who is part of The Cooper Health System (“Cooper Representatives”), including:

- Members of the Board of Trustees and its committees.
- Cooper’s executives and officers.
- All Cooper Health System employees at all locations, including contract, part-time, and temporary employees.
- Residents, students, and volunteers.
- Medical staff.
- Agents of Cooper.

Obligations of All Cooper Representatives

Cooper Representatives are, without exception, required to follow the Compliance Program and this Code of Ethical Conduct. Cooper Representatives have an affirmative obligation to report known or reasonably suspected violations of law, regulation, or Cooper policy.

Special Responsibility of Leaders

It is important for all Cooper leaders, whether executive staff, senior staff, medical staff leadership, supervisor, or manager to recognize their additional responsibilities in ensuring adherence to Cooper policies. All leaders must strive to lead by ethical example, to clearly communicate their expectations to their team members, to create a fair and just culture where employees are free to raise concerns openly and without fear of retaliation, and to promptly respond to and work to solve problems, obtaining help and advice where needed.

Our Code of Ethical Conduct

Overview

Cooper has implemented policies and procedures to foster and maintain an environment of compliance with our high ethical standards. This Code of Ethical Conduct is designed to represent commonsense guidelines for Cooper Representative to follow in conducting business on behalf of or in association with Cooper.

Many of the concepts discussed in this Code are embodied in more detailed policies of specific Cooper departments, such as Human Resources, Compliance, Administration, and Health Information Management. These policies and others can be found in the Cooper Policy Network, more commonly referred to as the [CPN](#). Cooper Representatives must remain familiar with all policies pertinent to their specific roles.

This Code of Ethical Conduct cannot anticipate every situation or circumstance that a Cooper Representative may encounter. This Code is designed, however, to assist Cooper Representatives in making ethical decisions, guided by integrity, good judgment, and common sense. When a course of action is unclear, Cooper Representatives must seek appropriate guidance.

General Principles

Ethical Business Conduct

Cooper is committed to providing high-quality medical care to its patients in a welcoming and healing environment. In so doing, Cooper pledges to follow high standards of ethics, honesty, and integrity, and to comply with all applicable laws and regulations.

Cooper Representatives Shall:

- Provide high-quality medical care and courteous service to all patients.
- Conduct business ethically and honestly, and with high standards of integrity.
- Treat others with dignity, respect, and courtesy.
- Be truthful in all communications—with each other, with our customers, with our business partners, and with regulatory agencies.
- Understand and comply with applicable laws and regulations—and with Cooper's standards, policies, and procedures.
- Avoid any activity that could reasonably be expected to reflect adversely upon the integrity of Cooper.
- Maintain an alcohol-, smoking- and drug-free workplace.
- In good faith, report known or suspected violations of law or regulation and conduct that conflicts with Cooper's standards, policies, and procedures.

Caring for Our Patients

Cooper Physicians, employees, and associated Representatives will treat all patients with care and compassion; with dignity, respect, and courtesy; and without discriminatory purpose.

Communicating With Our Patients

Cooper Representatives communicate with patients and their families. This includes listening to and following the choices made by Cooper patients in connection with their clinical care, as appropriate. Communication must include obtaining appropriate consent, detailing patient rights, explaining care options and risks, honoring advanced directives, and respecting choice in the selection of care and service providers.



Making Medical Decisions

Cooper Representatives must review medical procedures to confirm that they are medically necessary and in accordance with medical and ethical standards, regardless of compensation or financial risk. Emergency medical care—a hallmark of The Cooper Health System—will be provided without regard to the ability to pay for services, in accordance with Emergency Medical Treatment and Active Labor Act (EMTALA) regulations ([Policy 3.217 EMTALA](#)).

Ethics in Research

Cooper Representatives must conduct any research activities ethically and with scientific integrity, providing appropriate patient notification and consent, and obtaining mandatory institutional review.

Respecting Privacy Rights

Cooper Representatives may have access to many kinds of confidential, proprietary, or private information. Indeed, our patients trust us to protect their privacy rights and safeguard their personal information. Cooper Representatives must access and disclose protected or private health information, financial information, or other private information only when authorized and when necessary to perform job responsibilities. Cooper Representatives must be careful not to discuss private information in public spaces.

Cooper maintains detailed policies regarding the Health Insurance Portability and Accountability Act (HIPAA) and other federal and state privacy regulations. Cooper Representatives must maintain a firm commitment to complying with these privacy laws, regulations, and policies when working with patient information—whether in spoken, written, or electronic form. Guidance on privacy of patient information is available through Cooper’s Privacy Officer (856.361.1697).

Reporting Adverse Events and Near Misses

Cooper Representatives have an ethical and legal obligation to report serious adverse events and near misses involving patient care. Reporting is available online through the Event and Activity Reporting System (EARS) from the hospital portal or any at computer (http://rlweb01.chsmail.root.cooperhealth.edu/RL6_Prod/Homecenter/Client/Login.aspx?ReturnUrl=%2fRL6_Prod%2f) and by telephone (856.342.2112). Reporting additionally allows Cooper to determine why an event occurred and to prevent similar events from happening in the future. Cooper Representatives are encouraged to report any concern they have about any aspect of patient care. Cooper’s Patient Safety Hotline may be reached at 856.342.3047.

Collecting Payments

Cooper Representatives will pursue collections fairly and without harassment. Questions about charges must be promptly reviewed and resolved. Cooper Staff may not settle debts, forgive co-payments or deductibles, or negotiate charges without appropriate authorization and careful review of Cooper policies and procedures.





Respect for Our Workplace

Maintaining a Positive and Constructive Workplace

Cooper is committed to providing a safe and healthy environment at all of our facilities, where Cooper Representatives can excel in a positive and constructive atmosphere. Cooper Representatives shall treat others in the same way that they themselves would want to be treated: with dignity, respect, and courtesy. Equal employment opportunities will be extended to all individuals.

Cooper does not tolerate conduct that is unprofessional or disruptive in the workplace, including any conduct that is discriminatory, harassing, disrespectful, intimidating, threatening, or violent. Cooper encourages all Representatives to report any such conduct immediately, either to a supervisor, to Human Resources, or through the Compliance Hotline.

Cooper prohibits retaliation against those making good faith reports of such conduct.

Commitment to a Drug-Free Workplace

Cooper maintains an alcohol-, smoking- and drug-free workplace. Cooper Representatives may not be under the influence of alcohol, illegal drugs, or any other substances that may impair the ability to perform their work responsibilities while at work or while on Cooper property.

Controlled Substances

Some of our employees routinely have access to prescription drugs, controlled substances, and other medical supplies. Many of these substances are governed and monitored by specific regulatory organizations and must be accessed only to fulfill job responsibilities and must be administered in accordance with physician orders. It is extremely important that these items be handled properly and only by authorized individuals to minimize risk to patients and to Cooper.

If you suspect or become aware of the diversion of drugs from the organization, you must report this immediately to the Drug Diversion Specialist at 856.342.2646 or in-house 100.2646 or Drug-Diversion-Reporting@cooperhealth.edu. You may also report through the compliance hotline (1.800.500.0333) or to your supervisor or Human Resources. Reports may be made anonymously. If a caller discloses his or her name but requests confidentiality, Cooper will keep this information confidential to the extent permitted by law.

Any other questions or concerns may be referred to the Drug Diversion Specialist or may be reported anonymously through the Compliance Hotline.

Ensuring Environmental Safety

Cooper Representatives must demonstrate care in ensuring the safety of our workplace and our employees. It is particularly important to remain vigilant when handling and disposing of hazardous substances and when providing care to patients. Employ all proper safety personal protective equipment (PPE) and safety measures when using equipment or when there is a potential risk of splash/exposure.

Cooper Representatives are required to report any conditions that they believe to be unsafe or to pose an environmental hazard. If a condition is an immediate threat to the safety of patients, visitors, staff, or property, Cooper Representatives must immediately contact the Safety Officer/designee by calling 856.342.2905 during normal business hours or contacting the Clinical Operations Director after normal business hours, on holidays, or if the Safety Officer or designee phone is not answered.

Cooper Representatives must submit a report via the EARS System available on the hospital intranet portal or from any computer at http://rlweb01.chsmail.root.cooperhealth.edu/RL6_Prod. Risk Management may also be contacted at 856.342.2112 or through the Hospital Operator.

Political Activities

As a tax-exempt, not-for-profit entity, Cooper is prohibited from conducting political activities as a condition of that status. Cooper Representatives must refrain from engaging in activity that may jeopardize Cooper's tax-exempt status and must make sure that personal political activities are not viewed as activities taken on behalf of Cooper. Additional information about restrictions on political activities in the workplace can be found in [CPN Policy 1.128](#).

Honesty in Record Keeping

Cooper Representatives are given the responsibility to create, access, and modify many types of important records that affect how we conduct business at Cooper and how we take care of our patients.

Cooper Representatives must ensure that Cooper records honestly and accurately reflect the true nature of the transactions or events that they represent. Cooper Representatives must not create records that are intended to mislead, to report events falsely or inaccurately, or to conceal improper activity. It is important to remember that "records" exist in many forms including paper and all manners of electronic storage. The obligation to maintain truthful and accurate records does not change with the type of record being used.

Medical Records

Accurate medical records are central to providing excellent medical care. Cooper Representatives must make every effort to complete medical records clearly, completely, and promptly, with every individual taking responsibility for the total content and accuracy of their medical documentation. Although computer and electronic tools can help to save time in preparing medical documentation, Cooper Representatives must exercise due care to document accurately and ethically to reflect the nature of the care provided.

Financial Records

Financial records must conform to generally accepted accounting principles. Financial statements and reports must fairly present Cooper's financial condition, operations, and cash flow. It is a violation of law and Cooper policy for any Cooper Representative to improperly influence or mislead any accountant preparing Cooper's audit.

Reports to Outside Entities

As with all Cooper records, reports to outside entities—such as to government agencies, accrediting bodies, and other authorized parties—must be truthful and accurate.

Record Retention

Cooper's Compliance Program establishes record retention schedules and policies that explain how long a record is to be kept. Disposal of Cooper records is not discretionary. Cooper Representatives may only dispose of Cooper records when they are following Cooper's retention policies. Records must not be destroyed whenever litigation, government investigation, or audit is pending because improper destruction of records may constitute a criminal offense or result in other civil sanctions.





Integrity in Billing

Accurate and Truthful Billing

Whether involved in patient care directly or indirectly, Cooper Representatives provide services that result in bills for medical care or other types of services. Cooper's bills—whether submitted to patients, government agencies, or private insurance companies—must be accurate and truthful in all ways.

For example, Cooper Representatives must not:

- Bill for items or services that were not actually provided.
- Seek reimbursement for services that were not medically necessary.
- Misrepresent the type or level of service provided.
- Upcode (or assign a billing code that is higher than accurately reflects the service provided).
- Bill for undocumented or duplicate items or services.
- Unbundle where services are required to be billed together.
- Misrepresent a diagnosis to obtain payment.

Special Rules for Teaching Hospitals

As an academic medical center authorized to train physicians, Cooper receives government funding in connection with graduate medical education and the training of residents, interns, and fellows. The federal government has created special rules (known as PATH guidelines) for teaching hospitals, which Cooper Representatives are required to follow. These rules include special documentation, billing, and coding requirements that govern the training of residents and the billing of teaching physician services, when provided in conjunction with residents. Detailed information about the PATH guidelines is available through the Compliance Program and Health Information Management.

False Claims Laws

Federal and state laws, including the New Jersey and federal False Claims Acts, seek to protect the integrity of government programs, such as Medicare and Medicaid, by making sure that government funds are appropriately spent. Cooper has implemented policies and procedures designed to achieve compliance with these laws and to prevent fraud, waste, and abuse in government programs.

A "false claim" can take many forms and includes not only the intentional submission of an inflated bill to a government program, but also the failure to return a known overpayment from a government program.

If you are aware of an incorrect claim prior to submission, the claim must be corrected before it is submitted. If you become aware that a previously submitted claim is incorrect, you have an affirmative obligation to immediately contact the Compliance Department or make a report using the anonymous Compliance Hotline.

Subcontractors: Billing and Coding Vendors

Any subcontractors engaged to perform billing or coding services must have the necessary skills, quality assurance processes, systems—and appropriate procedures in place to ensure that all billing for government and commercial insurance programs is accurate and complete. Those entities, contractors, and vendors that are considered for this role must meet these criteria.

License and Certification Renewals

Medical staff members, employees, and individuals retained as independent contractors in positions that require professional licenses, certifications, or other credentials are responsible for maintaining the current status of their credentials and shall comply at all times with federal and state requirements applicable to their respective disciplines. To ensure compliance, Cooper may require evidence of the individual's current license or credential status.

Dealing with Accrediting Bodies

Cooper will deal with all accrediting bodies in a direct, open, and honest manner. No action should ever be taken in relationships with accrediting bodies that would mislead the accreditor or its survey teams, either directly or indirectly. The scope of matters related to accreditation of various bodies is extremely significant and broader than the scope of Cooper's Code of Ethical Conduct. The purpose of this Code is to provide general guidance on subjects of wide interest within Cooper. Accrediting bodies may be focused on issues of both wide and somewhat more focused interest. In any case, where Cooper determines to seek any form of accreditation, obviously, all standards of the accrediting group are important and must be followed.

Any questions about dealing with accrediting bodies may be directed to the Vice President of Quality and Patient Safety.

Interaction With Outside Entities

When Cooper needs to obtain goods or services from outside entities, Cooper Representatives must enter into contractual relationships for fair market consideration, based upon ability to meet contractual terms, necessity of the arrangement, and demonstrated quality and service. Through contract terms and the Compliance Program, Cooper Representatives ensure that Cooper does not do business with individuals or companies excluded by state or federal law from participating in health care programs. Cooper Representatives and their families must not receive personal kickbacks or rebates as a result of the purchase or sale of goods and services at Cooper.

Referrals

Cooper makes and accepts referrals of patients based upon patient needs, ability to render necessary services, and patient choice. Cooper Representatives must not offer, give, or receive something of value in hopes of inducing referrals or as a reward for obtaining referrals from others. "Something of value" does not just include money, but could also be services, gifts, entertainment, or anything else that has value to the recipient. Offering or accepting something of value from a referral source may constitute both a criminal and civil offense. Cooper Representatives will refer patients to other providers based upon clinical needs, capabilities, and patient choice.

Financial relationships with those who are in a position to refer patients to Cooper must be in accordance with federal and state law, including the federal Stark law and the Anti-Kickback statute, and may not be entered without approval by the Legal Department and in accordance with Cooper's policies. ([See Admin. 1.140, Agreements with Referral Sources.](#))

It is illegal under federal, state, and local law to offer any government official, directly or indirectly, anything of value in exchange for official action, inaction, or influence.

Marketing

Cooper Representatives will endeavor to market Cooper's services in a fair, accurate, and ethical manner. Cooper Representatives may not induce Medicare, Medicaid, or other federal or state health care beneficiaries to use our services by offering gifts that would likely influence these beneficiaries to obtain services from Cooper.



Fair Competition

Cooper Representatives must compete fairly and comply with all antitrust laws. Cooper Representatives must not make agreements with competitors that set prices or stifle competition. Cooper Representative must not illegally access or obtain proprietary information from competitors.

Protecting Cooper's Resources

Safeguarding Assets

Cooper Representatives must safeguard Cooper resources, using them responsibly for proper business purposes and not for personal gain.

Cooper Representatives must not use Cooper funds or assets for any unlawful or unethical purpose. Payments to third parties—such as vendors, contractors, or consultants—for any purpose other than that on the payment documentation are also prohibited.

Electronic Communications

To perform their jobs, Cooper Representatives are given access to many types of electronic communications systems and devices—for example, telephones, cell phones, computers, Internet access, e-mail and messaging services, handheld devices, and media storage devices. Cooper Representatives must always use these tools properly and professionally, recognizing that misuse can have a widespread and long-lasting impact upon Cooper and its reputation.

All communications systems cited are the property of Cooper and are to be used for business purposes. Highly limited reasonable personal use of Cooper communication systems is permitted ([9.108 Internet Acceptable Use Policy](#)); however, you should assume that these communications are not private.

Patient or confidential information sent through the Internet or via e-mail must follow Cooper's encryption and patient authorization policies ([9.210 Encryption](#) and [H-022 Confidential Communication of PHI](#)).

Copyrights

Cooper Representatives may only make copies of copyrighted materials pursuant to the Health Care System's policy on such matters.

Confidential Business Information

Cooper Representatives must protect confidential business information and trade secrets, being particularly mindful not to discuss confidential information in public areas or during social conversation. Examples of confidential business information include:

- Salary or benefits information.
- Financial data.
- Employee information.
- Social security numbers.
- Billing information.
- Planned capital projects.
- Proposed business deals or arrangements.



Avoiding and Resolving Conflicts

Duty to Avoid Conflicts

The actions and decisions of Cooper Representatives must be made in a manner that promotes the best interests of Cooper. Cooper Representatives must avoid situations in which their personal interests could conflict or appear to conflict with the interests of Cooper.

Cooper's policies address two types of conflicts: conflicts of interest—where outside relationships might affect the exercise of professional judgment on behalf of Cooper; and conflicts of commitment—where outside activities affect the ability of Cooper Representatives to devote the time, talent, and loyalty required to fulfill the terms of employment.

Conflicts, however, may take many forms and may be difficult to identify. Cooper Representatives must remain vigilant in identifying actual and potential conflicts of interest and conflicts of commitment.

What should you do if a conflict or potential conflict of interest arises? If a conflict of interest or potential conflict of interest arises, Cooper Representatives must notify their supervisor and the Legal Department (either directly or through their supervisor) and withdraw from any related participation or decision-making until the matter is reviewed and addressed. It is important that conflicts be reported immediately so that the situation can be managed effectively and Cooper's interests in conflict-free decision-making can be protected.

Who examines a conflict or potential conflict? The Legal and Compliance Departments will work to fashion an appropriate solution, based upon the individual facts of the situation. For example, Cooper Representatives may be required to disclose the conflict to others and withdraw from any decision-making role potentially affecting the conflicted interest.

Specific Conflict of Interest Policies

Cooper recognizes that Cooper Representatives perform many different and varied functions on behalf of Cooper. In addition to Cooper's primary conflicts policy within the Compliance Program, some Cooper Representative are required to follow additional policies, procedures, and disclosure requirements. Other specific conflicts policies cover:

- Medical Staff.
- Research.
- Members of the Board of Trustees, executives, and other high-ranking Cooper employees.

Cooper Representatives whose roles are affected by these policies must remain knowledgeable of and compliant with them.

Gifts, Entertainment, and Promotional Items

Interactions With Vendors

Cooper has enacted a detailed policy regarding interactions with vendors and the acceptance of gifts ([Corporate Policy 1.139](#)).

For example, this policy prohibits Cooper Representatives from accepting:

- Entertainment, such as tickets to sporting events or trips, from vendors.
- Tickets to Cooper fundraising events.
- Gifts from referral sources.
- Cash, gift cards, or other gifts from vendors.
- Expensive meals in connection with a dinner meeting.
- Lunch or dinner, including staff lunches, in the absence of an educational program, business discussion, or product demonstration. The vendor representative must be present.
- Branded promotional items—such as note pads, pens, or coffee mugs that display vendor or product name.



On behalf of their department, Cooper Representatives may accept only an occasional gift from a vendor for the benefit of that department that serves a genuine educational function and has a fair market value of less than \$100. Cash, cash gifts, or their equivalent (e.g., gift cards or vouchers) may not be accepted under any circumstances.

Grateful Patients, Families, or Friends

Cooper discourages staff from accepting gifts from patients, patient family members, or patient friends under any circumstances. The Cooper Foundation has a Grateful Patient Program, and patients, families, or others wishing to show their appreciation should be referred to the Cooper Foundation. Gifts of all denominations are accepted by the Foundation, and gifts may be directed to the Cooper program or unit of the donor's choice.

If a Cooper Representative is offered a gift that may be inappropriate, he or she should politely refuse it and explain that Cooper policy discourages them from accepting gifts. A Cooper Representative who receives a gift without an opportunity to refuse it should consult his or her manager or the Chief Compliance Officer for guidance. If Cooper Representatives have any questions about the appropriateness of accepting a gift or an event invitation, they should discuss the matter with their manager or contact the Chief Compliance Officer prior to participation or acceptance.

The Cooper Code of Ethical Conduct does not limit gifts exchanged between friends. A Cooper Representative who is friends with a patient, patient family member, or patient friends, or with an individual who has a business relationship with Cooper may exchange or receive personal gifts from that person. A Cooper Representative may not include a personal gift as a business expense for tax purposes and/or charge Cooper for the gift or otherwise receive reimbursement from Cooper to cover this expense.

Education and Training

Learning About Compliance

Cooper Representatives are required to complete educational training related to health care compliance, confidentiality, and other mandatory topics. Courses are offered through the Cooper Learning Network, an online training academy that can be accessed either at Cooper facilities or on personal computers/devices. Cooper Representatives may also be required to attend live training sessions. Cooper Representatives are encouraged to contact the Compliance Department to arrange educational programs that address training needs.

Acknowledgement

At hire and at least annually, Cooper employees are required to acknowledge their receipt and review of the Cooper Code of Ethical Conduct and confirm that they understand that the Code reflects Cooper's core beliefs and agree to abide by it.

Employees who do not comply with the annual certification requirement will be subject to disciplinary action. Support of the Codes and participation in related training programs and education may be considered in decisions regarding hiring, promotions and performance evaluations.

All members of the Cooper Medical Staff are required to acknowledge their receipt of the Code at initial appointment and re-appointment.

Members of the Cooper Board of Trustees and Board Committees acknowledge their receipt and review of the Code annually and agree to abide by it.



Disciplinary Action

Disciplinary and Remedial Action

Cooper Representatives who knowingly violate the Code of Ethical Conduct, Cooper policy or procedure, or law or regulation will be subject to appropriate corrective action, which may include termination, civil liability, or referral to law enforcement agencies. Cooper Representatives who feel that they have been disciplined unfairly will have the opportunity to appeal disciplinary action, pursuant to Cooper employment policies.



Raising Questions, Reporting Concerns

How to Report Concerns

Cooper Representatives have an affirmative obligation to report known or reasonably suspected violations of law, regulation, or Cooper policy. Further, failure to report may result in disciplinary action. All reports must be made in good faith. When reporting, it is important to have as many facts as possible so that you can obtain the most complete advice and so that the most appropriate inquiry can be conducted.

Suspected violations of health care compliance laws, regulations, or policies must be conveyed to the Compliance Department or through the Compliance Hotline. Reports may be made anonymously. Identified callers may request confidentiality.

Toll-free telephone number: 1.800.500.0333

Internet address: CooperHealth.alertline.com

Examples of health care compliance concerns include:

- Billing and coding practices.
- Arrangements with referral sources.
- Gifts or benefits from vendors.
- Accuracy of record-keeping.
- Compliance with Medicare and Medicaid regulations.

When someone, in good faith, raises a concern or makes a report, calls the Compliance Hotline, or cooperates with an investigation or a corrective action, retaliation against that individual is prohibited.

If a caller discloses his or her name but requests confidentiality, the Compliance Department will keep information confidential to the extent permitted by law.

Other questions or concerns may be referred to: supervisors, the Compliance Department, the Legal Department, or the Human Resources Department, or may be reported anonymously through the Compliance Hotline.

Whistleblower Protections

Federal and state laws establish the rights of individuals—known as “whistleblowers”—to bring legal action against people or companies engaged in illegal behavior. Cooper provides whistleblowers with protection from retaliation. Additional details can be found in Cooper University Health Care Policy—Education About the False Claims Act.

