

POLICY COMMUNICATIONS REPORT (PCR)

DATE: August 12, 2009

Policy Name and Code #: Reporting Compliance and Ethics Concerns, 00-01-15-55:00

Check one of the following actions:

New Revised (Substantive) Revised (Non-Substantive)
 Rescinded Reclassified

Date of Action: July 21, 2009

Purpose of Policy:

UMDNJ is committed to the prevention and detection of fraud, waste, and abuse related to all aspects of the operation of UMDNJ, including all UMDNJ, federal and state healthcare programs.

UMDNJ is also committed to the highest possible standards of ethical and business conduct and to the proposition not only that employees have a responsibility to report actual or suspected wrongful conduct but also that they should be able to do so without fear of reprisal. Such reports shall be accepted willingly, kept confidential to the extent possible in conformance with applicable laws, regulations and other procedures, and addressed promptly and appropriately.

Consistent with UMDNJ's commitments, this policy is intended to formalize and enhance existing procedures for reporting allegations of wrongful conduct.

Motivation for Revision:

The policy was revised to carve out the Federal and State Statutes Related to Section 6032 of the Deficit Reduction Act of 2005 and NJ Statutes relating of the same and place it as an addendum policy to highlight its definition. Moreover, provide a clarification of the disciplinary review committee (DRC) role in adverse termination.

Highlights:

- The policy places the responsibility on all employees to create and enhance a workplace that encourages employees to report their concerns, free of intimidation or harassment.
- All University employees are responsible for their activities on behalf of UMDNJ and those of their colleagues, comply with all applicable laws and UMDNJ policies.
- DRC will only review proposed termination if the adverse employment action appears to be a result of retaliation.
- Additional definitions to clarify terminology used in the policy.

Review/Approval Process

The policy was reviewed and endorsed by the General Counsel and the Chief Compliance Officer and approved by the Board of Trustees at their meeting on July 21, 2009.