Working Together for Quality

Our Code of Ethical Conduct
A message from our President and Chief Executive Officer

Dear Colleague,

Welcome to Northwell Health's Code of Ethical Conduct. Our Code demonstrates that we are committed to honesty, integrity and ethical behavior in all aspects of our work. We strive to act with intent, with heart and with passion to make people's lives the best possible, while protecting patient privacy and working honestly and fairly with our business partners and government regulators.

Equally important is the commitment we make to each other as colleagues as part of our new employee promise. As team players made for unwavering support, we are committed to providing a workplace that is free from discrimination, harassment and retaliation. We value the contributions of everyone across all of our practices, hospitals and facilities, and our Code helps all team members fulfill their desires to make things better.

Compliance is an integral part of quality, and our Code helps guide us on how to do our jobs the right way every day. We are very proud of the many quality awards we have received in recent years. In fact, our hospitals received 68 overall quality awards and a total of nearly $1 million in financial incentives from the US Centers for Medicare and Medicaid Services' Hospital Quality Improvement Demonstration.

Following our policies and procedures and complying with all relevant state and federal laws governing healthcare will help ensure that we continue providing high quality care.

Guided by our organizational values, 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 non-compliant 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 visiting Northwell.ethicspoint.com online. 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

Click to see a message from Michael Dowling.
Our values

Our organizational values represent our culture – who we are and what we stand for. They are the foundation upon which our Code of Ethical Conduct is built, guiding us on our journey to make people’s lives the best possible while protecting patient privacy and working honestly and fairly with our business partners and government regulators. At Northwell Health, we are:

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

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

Truly Ambitious
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.

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

Truly Ourselves
We are all unique. We stand united, proud and respectful, always celebrating our differences.
A message from our President and Chief Executive Officer 2

Our values 3

Our commitment to compliance 5
– The Code of Ethical Conduct 6
– Northwell Health’s Compliance Program 7
– Compliance-related policies 7
– Special responsibilities of supervisors and managers 7
– Discipline 7

Duty to comply and report 8
– Making ethical decisions 9
– Reporting obligations 9
– Consequences for not reporting potential compliance issues 9
– Non-retaliation and non-intimidation 10
– Responding to potential compliance issues 10

Our commitment to our patients and members 11
– High quality patient and member care 12
– Patient and member choice 12
– Emergency treatment (EMTALA) 13
– Safeguarding patient and member information 13
– Patient records 14
– Research 14
– Responsible conduct of research 14
– Credentialing 15
– Adverse event reporting 15
– Marketing and advertising 15

Our commitment to our business partners 19
– A shared responsibility 20
– Supplier, vendor, subcontractor, attorney and consultant relationships 20
– Referral of patients and members 20
– Gifts and interactions with industry 21

Our commitment to our colleagues 22
– Conflicts of interest 23
– Confidentiality of business data 24
– Substance abuse and impairment in the workplace 24
– Controlled substances 24
– Non-discrimination and equal employment opportunity 25
– Harassment 25
– Leadership and professionalism 25
– Health and safety 26
– Environmental protection 26
– Political contributions 26
– Use of Northwell Health resources 26
– Intellectual property 26
– Screening of excluded individuals and entities 27
– Media relations 27
– Responsible use of social media 27

Compliance resources 28
– The Office of Corporate Compliance 29
– The Compliance HelpLine 30
– The Office of Research Compliance 31
– The Office of Legal Affairs 31
– Compliance publications 31
– Compliance-related policies 32
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

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.

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

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

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. 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.

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


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.

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

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.

Find out more
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.

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.

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.

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.

Check-up

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.
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”

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 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 online.

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.

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.
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.

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.

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
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.

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.
Antitrust

Northwell Health and its employees have an obligation to comply with state and federal antitrust laws. These laws are designed to preserve and promote fair and honest market competition. Generally, these laws prohibit understandings or agreements with competitors that (i) artificially impact the price of services (i.e., including reimbursement rates, payment methodologies) or the cost of supplies (i.e., including wages), or otherwise improperly reduce competition; or (ii) allocate patients or services or divide geographic markets or territories. The antitrust laws also prohibit other conduct and arrangements that effectively exclude a competitor, supplier or vendor from doing business in a relevant market.

Antitrust issues can be complex. Northwell Health employees are expected to seek advice from the Office of Legal Affairs before (i) sharing with, or accepting from, a competitor information relating to pricing, reimbursement, salary or compensation, or other terms of doing business, (ii) agreeing to restrictions on Northwell Health’s ability to offer particular services, conduct business in particular geographic areas, or conduct business with one or more third parties; (iii) engaging in business activities that are intended to exclude another party from doing business in a particular area; or (iv) otherwise engaging in conduct that may involve a risk of violation of the antitrust laws or other, similar laws.

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.

Legal and policy updates

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.
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.

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.

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

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.

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.

Vital signs

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

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.

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.

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

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.

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.

Find out more

#100.024, “Policy on Intellectual Property”
#GR021, “Research Data Ownership”
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.

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 online.

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, 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.
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.

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.

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.

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.

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.

Vital signs

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

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.

Find out more

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

#900.00, “Computer Use Policy”
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
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
Phone: (516) 465-8327

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

Aaron Lund
Compliance Officer ACO
Compliance Director & Privacy Officer
CEMS, LIJ Forest Hills, LIJ Valley Stream, COI
Email: ALund@northwell.edu
Phone: (516) 465-3267

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

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

Compliance Audit

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

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

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

HIPAA Privacy and Security

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

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

AnnaMarie Amato
Specialist, HIPAA Compliance
Email: AAmato@northwell.edu
Phone: (516) 465-8844
Compliance Directors & Privacy Officers

Central Region: Long Island Jewish Medical Center, Cohen's Children's Medical Center, Zucker Hillside Hospital, North Shore University Hospital, Long Island Jewish Valley Stream, Long Island Jewish Forest Hills
Contact: Jennifer Fromkin
Title: Regional Compliance Director & Privacy Officer
North Shore University Hospital & Corporate
Email: jfromkin@northwell.edu
Phone: (516) 465-1835

Contact: Dara Goldstein
Title: Compliance Director & Privacy Officer
Zucker Hillside Hospital, Long Island Jewish Medical Center & Cohen's Children's Medical Center
Email: dgoldstein@northwell.edu
Phone: (516) 465-1821

Eastern Region: Glen Cove Hospital, Huntington Hospital, Peconic Bay Medical Center, Southside Hospital, Plainview Hospital, Syosset Hospital, South Oaks Hospital
Contact: Jonathan Dreyfuss
Title: Regional Compliance Director & Privacy Officer
Southside Hospital & Peconic Bay Medical Center
Email: jdreyfuss@northwell.edu
Phone: (516) 465-1942

Contact: Elizabeth Lotito
Title: Compliance Director & Privacy Officer
Glen Cove Hospital, Plainview Hospital, Syosset Hospital & OPTUM 360
Email: elotito@northwell.edu
Phone: (516) 465-1811

Contact: Sarah Putney
Title: Compliance Director & Privacy Officer
Huntington Hospital & South Oaks Hospital
Email: sputney@northwell.edu
Phone: (516) 465-3089

Northwest Region: Lenox Hill Hospital, Lenox Hill Greenwich Village, MEETH, Northern Westchester Hospital, Phelps Memorial Hospital
Contact: Louis DiGiovanni
Title: Regional Compliance Director & Privacy Officer
Northwest Region Lenox Hill Hospital, MEETH & Lenox Hill Greenwich Village
Email: ldiagiovanni@northwell.edu
Phone: (516) 465-3224

Contact: Eric Sandhusen
Title: Compliance Director & Privacy Officer
Northern Westchester & Phelps Memorial Hospitals
Email: esandhusen@northwell.edu
Phone: (516) 465-3007

Northwell Hospital Physician Partners
Contact: Maria Joseph
Title: Regional Compliance Director & Privacy Officer
Northwell Hospital Physician Partners
Email: m joseph@northwell.edu
Phone: (516) 465-7937

Contact: Donna Angulo
Title: Compliance Director & Privacy Officer
Northwell Hospital Physician Partners
Email: dangulo@northwell.edu
Phone: (631) 351-4171

Southwest Region: Staten Island University Hospital
Contact: Janice Stewart
Title: Regional Compliance Director & Privacy Officer
Southwest Region & Joint Ventures
Email: jstewart2@northwell.edu
Phone: (516) 465-8831

Contact: Michael Scognamiglio
Title: Compliance Director & Privacy Officer
Staten Island University Hospital
Email: mscognamiglio@northwell.edu
Phone: (718) 226-4630

Contact: Robert Abramson
Title: Compliance Audit Manager
Staten Island University Hospital
Email: r abramson1@northwell.edu
Phone: (718) 226-5029

Contact: Michele Bonomo
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Staten Island University Hospital
Email: mbonomo1@northwell.edu
Phone: (718) 226-4859

Contact: Elaine Burke
Title: Compliance Specialist
Staten Island University Hospital
Email: e burke4@northwell.edu
Phone: (718) 226-1919

Staten Island University Hospital, PPS
Contact: Regina Bergren
Title: Compliance Officer
Email: rbergren@statenislandpps.org
Phone: (718) 226-5029

Post-Acute Services: Broadlawn Manor, Home Care Network, Hospice Care Network, ORZAC, STERN, STARS, Northwell Health Laboratories
Contact: Patricia Cooper
Title: Regional Compliance Director & Privacy Officer
Post-Acute & Northwell Health Laboratories
Email: p cooper2@northwell.edu
Phone: (516) 465-1822

Contact: Jennifer Small
Title: Compliance Director & Privacy Officer
Northwell Health Laboratories & Westchester Health Associates
Email: j small5@northwell.edu
Phone: (516) 465-7994

CareConnect Insurance Co., Inc.
North Shore-LIJ Health Plan, Inc.
Contact: Erin Murphy
Title: Compliance Director & Privacy Officer
Email: emurphy2@nslijcc.com
Phone: (516) 405-7515

Contact: Mary Chaber
Title: Privacy and Special Investigations Unit Officer
Email: mchaber@nslijcc.com
Phone: (516) 405-7514

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 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 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
Phone: (516) 321-2108

Stephen Frattini, DVM
Pre-Clinical Research Compliance Manager
Email: sfattini@northwell.edu
Phone: (516) 321-2112

Hamangi Patel, MSW, CCRP
Research Compliance Manager
Email: hpate17@northwell.edu
Phone: (516) 321-2110

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

**Quality Assurance Division**
JiYoung Choi, CCRP, ROAP-GCP
Research Compliance Manager
Email: jcho7@northwell.edu
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Stephen Frattini, DVM
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Alison Powell, LATG
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Phone: (516) 321-2115

**Regulatory Affairs Division**
Sharon Hochman, MA
Clinical Research Monitor
Email: shochman@northwell.edu
Phone: (516) 321-2121

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

**External Interests (COI) Compliance Division**
Scott Beardsley
Research Compliance Manager
Email: sbeardsley@northwell.edu
Phone: (516) 321-2119

Gerry Kasoff
Research Compliance Manager
Email: gkasoff@northwell.edu
Phone: (516) 321-2116

**Contact the ORC for Assistance**

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

**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
Phone: (631) 414-1413

**Acknowledgment**
Northwell Health requires that you sign an acknowledgment confirming that you 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”
#800.03 – “Release of Protected Health Information for Deceased Patients”
#800.04 – “Identity Theft Prevention Program”
#800.05 – “Patient’s Right to Request Accounting of Disclosure of Protected Health Information”
#800.06 – “HIPAA and State Privacy Breach Notifications”
#800.07 – “HIPAA Privacy and Security Officer Designation”
#800.19 – HIPAA Business Associate Policy
#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”

HR compliance related policies

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

HR compliance related policies
(cont.)

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”


# 900.20 – “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

#9051 – “Research Misconduct”

#9053 – “Research at the Northwell Health”

#9056 – “Research with Human Subjects (IRB Approval)”

#9027 – “Preparation for an External Regulatory Research Inspection at a Clinical Site”

#9078 – “Review of External Consulting Agreements with Industry for Researchers”

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

#GR021 – “Research Data Ownership”

#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”