

Orthodox Jewish Nurses Association

Corporate Compliance Policy

411 Hempstead Turnpike, Suite 200, West Hempstead, NY 11552

Introduction Purpose

The purpose of this Corporate Compliance Program is to assist and ensure that all covered persons and members understand and adhere to the Code of Ethical Conduct. The Program is designed to educate employees and members, ensure compliance with the Code, foster an ethical corporate environment, establish a mechanism to detect and identify violations of the Code or other unethical behavior, and audit the organization's, members', and employees' compliance and adherence to the Code.

To comply with all applicable laws, rules and regulations and the Office of Inspector General, among others, this policy establishes a code of ethical conduct and ethical operational standards for all covered entities/individuals doing business with Orthodox Jewish Nursing Association (OJNA). This policy is not intended to address all situations; it is a safeguard. Therefore, questions should be addressed with immediate supervisors and/or the Compliance Officer as appropriate.

What is OJNA?

Orthodox Jewish Nurses Association (OJNA) was founded in 2016. OJNA is a non-profit organization that serves to operate as an Organization for Orthodox Jewish nurses. Additionally, the OJNA's mission seeks to provide a forum to discuss professional issues related to Orthodox Jewish nurses, arrange social and educational events, and to serve the special needs of its members.

I. Policy

It is the policy of the Orthodox Jewish Nurses Association to comply with all applicable federal, state and local laws and regulations and payer requirements. It is also the OJNA policy to adhere to the Code of Ethics adopted by the Board of Directors, the Chairperson and the Compliance Committee.

II. Commitment

We have always been and remain committed to our responsibility to conduct our business affairs with integrity based on sound ethical and moral standards. We will hold our employees, members, contracted practitioners, and vendors to these same standards.

OJNA is committed to maintaining and measuring the effectiveness of our Compliance policies and standards through monitoring and auditing systems reasonably designed to detect noncompliance by its employees, members, and agents. We shall require the performance of

regular, periodic compliance audits by internal and/or external auditors who have expertise in federal and state health care statutes, regulations, and health care program requirements.

III. Responsibility

All board members, members, committee members, employees, contracted practitioners, and vendors shall acknowledge that it is their responsibility to report any suspected instances of suspected or known noncompliance to their immediate supervisor, the Chairperson or the Compliance Officer. Reports may be made anonymously without fear of retaliation or retribution. Failure to report known noncompliance or making reports which are not in good faith will be grounds for disciplinary action, up to and including termination. Reports related to harassment or other workplace- oriented issues will be referred to the OJNA Board.

IV. Policies and Procedures

OJNA will communicate its compliance standards and policies, via distribution of this Compliance Policy, to all members, employees, committee members, and vendors.

Plan Overview

The policy of OJNA always has been to conduct its business in compliance with all applicable federal, state and local laws and regulations as well as to adhere to the highest ethical standards. This Compliance plan reflects the commitment of the Board of Directors, management and staff to integrate compliance and quality into all aspects of OJNA activities. This Plan is designed to promote compliance with applicable laws and regulations as well as all requirements of government contracts and conditions of participation in public programs.

The Compliance Plan reflects a commitment to:

- Prevent fraud, abuse and other improper activities by maintaining a culture of compliance within OJNA;
- Detect errors and potential or suspected misconduct at an early stage;
- Respond swiftly to compliance problems through appropriate disciplinary and corrective action; and
- Encourage members and employees to report compliance concerns and protect employees from retaliation for making reports in good faith; and
- Protect the interests of OJNA overall.

Many aspects of the Compliance Plan have been in effect since before the development of a formal Compliance Plan document. Existing policies, procedures and standards are integral to compliance controls. The Compliance Plan is an evolving document. It will be amended and supplemented from time to time to reflect experience and to conform to changes in law, regulations, guidance and best practices.

Scope of Responsibility of Compliance Plan

The Compliance Plan reflects principles that all OJNA employees, members, committee members, officers, and contractors are expected to adhere to as they perform their duties with regard to OJNA. *Employees, members, committee members, and officers are referred to collectively in the Compliance Plan as “Covered Persons.”*

All Covered Persons are expected to:

- Familiarize themselves with this Code of Conduct and the compliance procedures that pertain to their OJNA responsibilities;
- Understand the key policies that govern their responsibilities to OJNA;
- Report any suspected fraud, abuse, non-compliance or other improper activity through the mechanisms established under the Plan;
- Reports may be made anonymously without fear of retaliation or retribution;
- Cooperate in training, reviews and other Compliance Plan functions; and
- Carry out their responsibilities to OJNA in a manner that demonstrates a commitment to honesty, integrity and compliance with the law, and adhere to OJNA's interests.

Failure to report known non-compliance or making reports which are not in good faith will be grounds for disciplinary action, up to and including termination of OJNA membership.

V. OJNA Code of Ethical Conduct / Conflict of Interest

Intent

OJNA's Code of Ethical Conduct (the Code) applies to all covered members, committee members, employees and independent contractors. At the discretion of the Chairperson or the Board of Directors, a Board member, management and other members and employees may be required to complete a Conflict of Interest Disclosure Statement (Attachment A).

The Code of Conduct was approved by OJNA's Board of Directors and is a formal statement of the Foundation's commitment to the standards and rules of ethical conduct.

OJNA is committed to preventing the occurrence of unethical or unlawful behavior, stopping such behavior as soon as possible after discovery, and to discipline members or employees who violate the Code, including those who neglect to report a violation.

All members and employees must comply with this Code, immediately report any alleged violations of wrongdoing, and assist management and compliance personnel in investigating allegations of wrongdoing.

While these standards addressed in the Code of Conduct are intended to guide members and employees in the course of their day-to-day responsibilities, they do not replace any Organization or program policies and procedures. There may be instances that are not addressed by the Code of Conduct or existing policies and procedures, or activities that may conflict with these standards. Members and employees must seek direction from the OJNA Board, OJNA management staff, or the Compliance Officer in these instances.

Ethics

It is the policy of OJNA to observe all laws and regulations applicable to its business and to conduct business with the highest degree of integrity. To accomplish this, all members, employees, and contractors must obey the laws and regulations that govern their work and always act in the best interest of the membership we serve and OJNA.

Guidelines for Members, Employees, and Contractors

- You are expected to keep committee chairs and the OJNA Board informed of what you are doing; to document or record all services or transactions accurately; and to be honest and forthcoming with OJNA, regulatory agencies, and internal and external auditors.
- You are expected to comply with the OJNA's policies and procedures, accounting rules, and internal controls.
- You are expected to function with honesty in your work for OJNA and with people we serve, providers, suppliers and all others with whom OJNA does business.

Conflict of Interest

Officers, members, employees, and contractors must not allow any outside financial interest, or competing personal interest to influence their decisions or actions taken on behalf of OJNA.

Members, employees, and contractors must avoid any situation where a conflict of interest exists or might appear between their personal interests and those of OJNA. The appearance of a conflict of interest may be as serious as an actual conflict of interest.

It is a conflict of interest for you to personally take for yourself opportunities that are discovered through the use of OJNA property, information or position with OJNA; to use OJNA property or information for personal gain; or to compete with OJNA.

There are many types of situations where potential conflicts may arise. You must promptly report any actual or potential conflicts of interest to the OJNA Board of Directors or directly to the Compliance Officer.

Outside Activities and Employment/Membership

- Committee members and OJNA Board Members represent OJNA in their everyday life and they must represent OJNA positively in the community.
- Any interest by board member or committee member in an OJNA vendor must be disclosed and cleared by the board.
- Any employment with an OJNA vendor or provider must be disclosed and cleared by the board.

Committees

- Committees are set up at the sole discretion of the Board of directors and can be modified, disbanded, and formed at the Board's will. Each committee will be composed of different members or employees of OJNA.
- Committee members will be provided with a mandate for their committees to include the rules of which they must follow. Broadening the mandate without written approval of the Board will be grounds for possible disbandment of the committee and/or termination

of membership/employment.

- No committee has more power over the other. Sole power rests with the Board.
- Committees must submit their budget to the board for approval.

Use of OJNA Funds and Resources

- OJNA assets are to only be used for the benefit of OJNA and its members. Assets include monies, funds, equipment, inventory, and supplies, but also concepts, business plans and strategies, information about members, financial information, computer property rights, and other business information about OJNA. For gifts, gratuities, or entertainment rules see page 8 below.
- You may not use OJNA assets for personal gain or give them to any other persons or entities, except in the ordinary course of business as part of an approved transaction.
- The full board must evaluate, thoroughly understand, and approve any funds that are reimbursed to an officer, member, employee, or contractor for outlay of funds in service of the organization.
- The board will fully review any expenditure above \$1,000 and must issue a written statement of approval prior to any outlay. The board only authorizes any officer to approve payments or receipts on behalf of OJNA that are described in documents supporting the transaction. "Slush funds" or similar off-book accounts, where there is no accounting for receipts or expenditures on the Foundation books, are strictly prohibited.

Confidentiality

- During your employment/membership, you may acquire confidential information about OJNA, its members, staff, and people we serve that must be handled in strict confidence and not discussed with outsiders. The protection of confidential business, staff and consumer information is very important.

Ownership of Work Product

- All writings, works of authorship, technology, inventions, discoveries, ideas and other work product of any nature whatsoever, that are created, prepared, produced, authored, edited, amended, conceived or reduced to practice by a member or employee individually or jointly with others during membership/employment hours, or during committee operations and relating in any way to OJNA business or contemplated business, research or development of OJNA (regardless of when or where the Work Product is prepared or whose equipment or other resources is used in preparing the same) and all printed, physical and electronic copies, all improvements, rights and claims related to the foregoing, and other tangible embodiments thereof (collectively, "Work Product"), as well as any and all rights in and to copyrights, trade secrets, trademarks (and related goodwill), patents and other intellectual property rights therein arising in any jurisdiction throughout the world and all related rights of priority under international conventions with respect thereto, including all pending and future applications and registrations therefor, and continuations, divisions, continuations-in-part, reissues, extensions and renewals thereof (collectively, "Intellectual Property Rights"), shall be the sole and exclusive property of OJNA.

Business Dealings Between the Organization and its Members or Employees

- OJNA will not be inappropriately influenced with goods or services from any business in which a Covered Person or their immediate family members have a substantial interest or employment.
- Property and resources of OJNA should only be used for the benefit of the Organization or its members. Any resources that will benefit a Covered Person or an immediate family member must be disclosed and cleared by the board.
- Any Meals or Entertainment for OJNA must be cleared by the board with a properly approved expense report.

Maintenance of Records

Members, employees, and contractors must record and report all Organization, consumer and financial information fully, accurately, and honestly. Records include, but are not limited to, records of the people we serve, documentation of services, accounting books or records, financial statements, timesheets or records, expense reports, vouchers, bills, payroll, claims payment records, correspondence, and any other method of communication. Members, employees, or contractors must not omit or conceal any relevant information. The Board will review the books and records on a quarterly basis to ensure compliance.

Many of the OJNA forms are documents used to prove that an expenditure was made, to bill, to record a job task, or to record specific happenings. You must document accurately and honestly, for those services that you provided or those events you were involved in.

Falsification of Records

- You must not make any false entries in any of OJNA's records or in any public record for any reason.
- You may not alter any permanent entries in OJNA's records.
- You may not create or participate in the creation of any records that are intended to mislead or to conceal anything that is improper.
- Each Covered Person must maintain their own records as to their operation within the Organization and any material changes made to such records other than the original preparer must be disclosed and cleared by the board.

Expense Records

- You must always charge expenses accurately regardless of the financial status of the program, project, or contract, or the budget status of a particular account or line item.

Retention of Records

- The retention, disposal, or destruction of records of or pertaining to OJNA must always comply with legal and regulatory requirements and Organization policy.

- You may not destroy records pertaining to litigation or government investigations or audit without express written approval of the Compliance Officer.

Protection of Confidential Information

The Organization has developed policies and procedures to assure that the confidentiality of Organization information and information about the members is protected and released only with the appropriate authorization or for lawful reasons, in addition to purposes of treatment, payment, and operations. All members, employees, and contractors are required to comply with the OJNA Privacy Policy. If you have any questions concerning confidential information or the Privacy Policy, contact your committee chair, OJNA Board Members, or the Compliance Officer.

Guidelines for Officers, Members, Employees, and Contractors

You must treat all OJNA records and information and work product as confidential.

You may not release confidential information without the proper authorization. Confidential information includes not only information about the people that we serve, but also non-public information about OJNA that may be of use to the OJNA's competitors or harmful to OJNA or its members if released.

You must protect OJNA information and avoid discussing or disclosing OJNA information, purposefully or inadvertently (through casual conversation), to any unauthorized person inside or outside OJNA. Furthermore, members and staff may not share confidential OJNA information with anyone, except where required for a legitimate business purpose.

Termination of Employment/Membership

- You may not use any confidential information gained from your employment/membership with OJNA for your or another company's benefit. You may not take copies of any reports, documents, or any other property belonging to OJNA.
- Upon termination of employment/membership with OJNA you must return all Organization property including, but not limited to, copies of documents, notes and other records containing confidential information; computer disks; and credit cards.

Information Security

- You are responsible for properly using information stored and produced by all of OJNA's digital platforms.
 - Computers, Internet access, email, or other office communications systems are intended for business-related purposes only and not for uses that may be disruptive, offensive, harassing, or harmful to others.
 - All members, employees, and contractors are required to comply with OJNA's information technology policy and procedure. If you have any questions concerning information security, contact the OJNA Board or Compliance Officer.

Fair Dealing

Conducting business with providers, contractors, suppliers, people we serve, and competitors

may pose ethical problems. Employees and contractors are expected to deal fairly with providers, contractors, people we serve, and competitors.

The Code of Conduct and the following guidelines are intended to help you make appropriate, responsible and correct decisions in these and all matter:

- Kickbacks and rebates in cash, credit, or other forms are prohibited. They are not only unethical but, in many cases, illegal.

Gifts and Gratuities and Entertainment

- You may not solicit money, gifts, gratitude, or any other personal benefits or favors of any kind from providers, contractors, producers, or accounts.
- You must not offer or accept meals or entertainment that is not a reasonable addition to a business relationship but is primarily intended to gain favor or to influence a business decision.
- Gifts to donors or vendors that further the OJNA mission are permitted if they do not exceed \$25. Any gifted items that is to be outlaid with an expenditure above \$25 will need written approval by the board, with a compelling reasoning as to why it is necessary, and such statement and its approval must be referenced in the OJNA books and records.
- Offers of meals or entertainment for donors or vendors that further the OJNA mission are permitted if they are limited in nature, and not exorbitant. Any of the above items that is to be outlaid with an expenditure above \$100 per participant will need written approval by the board, with a compelling reasoning as to why it is necessary, and such statement and its approval must be referenced in the OJNA books and records.

Agreements with Contractors and Vendors

OJNA must assure that any agreements with contractors and vendors clearly and accurately describe the services to be performed or items to be purchased. Performance standards, and the applicable compensation, if any, must be reasonable in amount, not be excessive in terms of industry practice and must equal the value of the services rendered. Any conflicts or connections between a contractor or vendor and any board member, officer, or employee of OJNA must be properly disclosed in writing to the board, the board must agree in writing to any assumption of such agreement in light of the disclosed conflict or connection. The conflicted officer, or employee will be walled off from any compensation decision making.

Improper Use of Funds or Assets

Use of the Organization's funds or assets for any improper purpose is strictly prohibited. If you are aware of or have reason to believe that funds or assets are being improperly used, you must report this immediately to the OJNA Board or the Compliance Officer.

Federal and State Programs

OJNA is committed to complying with the laws and regulations that govern the federal and state programs that it participates in. Policies and procedures, the Compliance Program, and this

Code of Conduct are developed to provide guidance in your day-to-day work on behalf of the organization. You must abide by the policies and procedures and the standards set by OJNA.

Governmental Investigations

There may be times that OJNA is asked to cooperate with an investigation by a federal or state governmental Organization, or to respond to a request for information. A request may be formally addressed to the Organization or an individual within OJNA. Employees and contractors must report any requests for information or cooperation with an investigation to the Compliance Officer immediately.

Political Activities and Contributions

Because OJNA is a nonprofit organization, it is prohibited from engaging in any political campaign activities and a "substantial" amount of lobbying. Organization funds and resources may not be used for political contributions or activities.

You may not act as a representative of OJNA in any political campaign activity. In expressing your personal political views or support or opposition of a candidate for public office, it must be very clear that you are expressing your personal view, support, or opposition as an individual and not a representative of the Organization.

Laws and regulations prohibit a "substantial" amount of lobbying. There are allowances for OJNA to advocate its position on public issues. To assure that OJNA does not violate any laws or regulations, or risk losing its tax-exempt status, you must seek prior approval from the Compliance Officer before engaging in any lobbying activities. The Compliance Officer must need to consult with legal counsel on the matter and will need to record the amount of time spent in lobbying activities.

Employment Environment

OJNA is committed to creating a safe and professional environment where members, employees, and others are treated with respect and without regard to protected characteristics such as their race, sex, age, religion, national origin, color, marital status, disability or sexual orientation. Business integrity, teamwork, trust, and respect are OJNA's most important values. Unlawful discrimination or harassment of any sort violates these values. All OJNA members and employees must exhibit and promote respect, integrity, trust, and teamwork in the workplace and must comply with this policy prohibiting discrimination and harassment in all facets of the Organization's work.

All members and employees are required to support the OJNA commitment to a safe and professional work environment and to demonstrate appropriate behavior in the workplace or at its events.

All members and employees are prohibited from joking about another member or employee's race, sex, age, religion, national origin, color, marital status, disability, sexual orientation or other protected characteristics.

All members and employees are prohibited from considering someone's race, color, religion, sex, national origin, age, disability, sexual orientation or other protected characteristic in

making decisions about hiring, placement, assignment of duties, training, promotion, termination, compensation, benefits and other work terms.

Sexual harassment is prohibited. Sexual harassment includes any form of unwelcome sexual advance, request for sexual favors, or other verbal or physical conduct of a sexual or sex-based nature. You are responsible for understanding the OJNA policy prohibiting discrimination and sexual harassment, as well as its implementation.

Seeking Guidance and Reporting Violations

Members, employees, and contractors must report any actual or suspected violations of this Code of Conduct, any applicable law or regulation, or any OJNA policy and procedure to the OJNA Board or the Compliance Officer.

When an actual or suspected violation of this Code of Conduct, any applicable law or regulation, or any Organization policy and procedure is reported to any OJNA member or employee, it must be promptly referred to the Compliance Officer. Steps will be taken to protect confidentiality and anonymity, when appropriate and warranted. OJNA will not tolerate any form of retaliation against a person who makes a good-faith report in accordance with this Code of Conduct.

All officers, members, employees, and contractors must cooperate fully and honestly in any investigation into a reported violation of this Code of Conduct, any applicable law or regulation, or Organization policy, procedure, or practice.

Corrective Action and/or Discipline

Any officer, member, employee or contractor who violates or knowingly fails to report any violation of this Code of Conduct, any applicable law or regulation, or OJNA policy, procedure, or practice is subject to appropriate disciplinary action, up to and including termination.

Disciplinary action may range from a warning to suspension, discharge, or termination of membership depending upon the nature of the incident and the relevant surrounding circumstances.

Your Responsibilities

- Read and understand OJNA Corporate Compliance Plan, Corporate Compliance Policies and Procedures, and Code of Conduct.
- Follow the OJNA Code of Conduct and abide by all policies and procedures, guidelines, and federal and state laws and regulations.
- Be alert to any situation that could violate the OJNA Code of Conduct, policies and procedures, guidelines, and/or federal and state laws and regulations.
- Promptly report any issues, concerns, violations or suspected violations to the OJNA Board, other management staff, Committee Head, Compliance Officer, or the Chairperson.

VI. Compliance Oversight

Designation of a Compliance Officer and a Compliance Committee

The Corporate Compliance Officer is appointed by the Board of Directors.

The OJNA Corporate Compliance Officer will report directly to the Chairperson, and to the Board of Directors, or can be the Chairperson with regular oversight by the Board. The Corporate Compliance Officer will be tasked to oversee and monitor the implementation of the Compliance Plan and serve as a member of the Compliance Committee which will be comprised of representatives of both the service and administrative sides of the OJNA organization and provide coordination, oversight and evaluation of OJNA operations, including subcontractors and providers.

The Corporate Compliance Officer will be given the authority to review all documents and other information that is relevant to the compliance activities, including, but not limited to, member records, billing records, contracts and obligations of OJNA and its subcontractors and providers as applicable.

The Corporate Compliance Officer has responsibility for the day-to-day operation of the compliance program. The Corporate Compliance Officer has responsibilities that include:

- Overseeing the development and implementation of policies and procedures that govern OJNA's compliance efforts;
- Coordinating various functions, such as auditing, training, reporting, following up with investigations, and making recommendations for corrective action;
- Implementing plans for correction of deficiencies;
- Overseeing administration of Organization risk assessment relative to compliance issues;
- Developing and implementing internal audit procedures relative to compliance issues;
- Maintaining a library of regulations, Organization policies, and procedures;
- Overseeing the implementation of the compliance training program, in conjunction with the Board of Directors;
- Investigating matters related to compliance issues;
- Ensuring proper reporting of violations to enforcement agencies as appropriate; and
- Developing and implementing communication channels, which encourage members and employees to report potential problems without fear of retaliation.

The Compliance Officer will report directly to the Board of Directors regarding the status of all items under his/her purview.

The Board of Directors shall:

- Receive regular reports from the Compliance Officer and provide guidance regarding the operation of the program;
- Approve the internal auditing plan carried out under the Program;
- Approve the compliance training program provided to all staff, members, contractors,

and Board members;

- Review and confirm the adequacy of all investigations of suspected non-compliance and any corrective actions taken as a result of such investigations;
- Review the books and records of the Organization quarterly;
- Review policies and procedures related to compliance; and
- Recommend and approve any changes to the program.

VII. Training and Education

Training as to information regarding compliance issues, expectations and compliance program operation will be presented to the Board of Directors, officers, managers, members, employees, and contractors to an extent and in a manner pertinent to their OJNA responsibilities.

Training will include the Corporate Compliance Plan, a summary of the standards of conduct, explanation of the elements of the Corporate Compliance Plan including the complaint or reporting process, and highlights of OJNA's commitment to integrity in its business operations and compliance with laws and regulations.

Additional training may be required for members and employees in specific areas of risk and the Compliance Officer will coordinate and schedule this as needed and may supplement training.

VIII. Effective, Confidential Communication

OJNA maintains an open door policy toward members and employees, especially in areas concerning compliance. Any communication brought to the attention of the Compliance Officer will be investigated thoroughly and fairly.

Members and employees are required to promptly report any suspected improper activity of which they become aware in one of the following ways:

- Notifying the Compliance Officer;
- Notifying any other member of the OJNA Board

Members and employees may report compliance concerns in any fashion with which they are comfortable, including face-to-face, telephone, written communications, and e-mail. Members and employees who wish to anonymously report suspected violations of the Compliance Plan or Code of Conduct may do so in writing to the Compliance Officer.

Other Covered Persons, and any other individual, may report compliance concerns by contacting the Compliance Officer, or by contacting a member of the OJNA Board.

OJNA will make every reasonable effort to maintain in confidence the identity of any individual who reports possible misconduct, to the extent consistent with OJNA obligations to investigate the report, take corrective action, cooperate with government agencies, and to comply with applicable laws. A strict non-retaliation policy shall be established to protect employees and others who report problems and concerns in good faith from retaliation.

The OJNA policy for reporting compliance concerns and non-retaliation shall include:

1. All members and employees have an affirmative duty and responsibility for promptly reporting any known or suspected misconduct, including actual or potential violations of laws, regulations, policies, procedures, Organization's Corporate Compliance Plan, or the Organization's Code of Conduct.
2. The "open-door policy" will be maintained at all levels of management to encourage members and employees to report problems and concerns.
3. OJNA will provide a Compliance Officer full contact information. Members and employees may report their compliance concerns confidentially to the Compliance Officer.
4. Any form of retaliation against any member or employee who reports a perceived problem or concern in good faith is strictly prohibited.
5. Any member or employee who commits or condones any form of retaliation will be subject to discipline up to, and including, termination of membership.
6. Members and employees cannot exempt themselves from the consequences of their own misconduct by reporting the issue, although self-reporting may be taken into account in determining the appropriate course of action.
7. Members and employees have the same reporting obligations for actual or suspected violations committed by OJNA vendors or subcontractors.
8. Confidentiality will be maintained to the extent that is practical and allowable by law.
9. Members and employees may report their compliance concerns confidentially to the Compliance Officer.
10. If a member or employee believes in good faith that he has been retaliated against for reporting a compliance complaint or concern or for participating in any investigation of such a report or complaint, the member/employee should immediately report the retaliation to the Compliance Officer. The report should include a thorough account of the incident(s) and should include the names, dates, and specific events, the names of any witnesses, and the location or name of any document that supports the alleged retaliation.
11. Knowledge of a violation or potential violation of this policy must be reported directly to the Compliance Officer

Procedures that apply to Management (which includes executives and committee chairs)

1. Any member of management who receives a report of a violation or suspected violation will immediately notify the Compliance Officer in writing.
2. Management must take appropriate measures to ensure that all levels of management support this policy and encourage the reporting of problems and concerns.

Procedures that apply to the Compliance Officer

- The Compliance Officer will ensure that all reports of violations or suspected violations are recorded.
- The Compliance Officer will determine the scope of the reported issue and make a determination regarding the course of action, including the investigation process and notifications to be made. (Refer to Investigation of Compliance Issues Policy.)
- The Compliance Officer will be responsible for the investigation and follow-up of any reported retaliation against a member or employee for reporting a compliance concern or participating in the investigation of a compliance concern.
- The Compliance Officer will report the results of an investigation into suspected retaliation to the governing entity deemed appropriate, such as the Corporate Compliance Committee or the Board of Directors.

IX. Enforcement of Compliance Standards / Disciplinary Policies

OJNA has developed procedures for disciplinary actions to be taken for violations of the Corporate Compliance Program and/or Code of Conduct by officers, members, employees, and/or independent contractors.

A. Policy

1. Officers, members, employees, and independent contractors who, upon investigation, are found to have committed violations of applicable laws and regulations, the Corporate Compliance Program, the Code of Conduct, or the Organization's policies and procedures will be subject to appropriate disciplinary action, up to and including termination.
2. The following actions may result in disciplinary action:
 - Authorization of or participation in actions that violate the law, regulations, and Corporate Compliance Program, including the Code of Conduct, and all related policies and procedures;
 - Failure to comply with Organization's policies governing the prevention, detection, or reporting of fraud and abuse;
 - Failure to report a violation by a peer or subordinate;
 - Failure to cooperate with an investigation;
 - Retaliation against an individual for reporting a possible violation or

participating in an investigation; and

- Failure to act as an honest, reliable and trustworthy service provider.
3. Discipline will be appropriately documented along with a written statement of reason(s) for imposing such discipline.
 4. The Compliance Officer will be responsible for assuring that disciplinary actions related to non-compliance with the law, regulations and Corporate Compliance program, including the Code of Conduct, are consistent with actions taken in similar instances of non-compliance.

B. Procedures

1. OJNA shall apply progressive discipline consistent with the violation. Examples of the disciplinary action that may be taken in accordance with the nature and scope of the infraction include but are not limited to: (a) verbal counseling or warning; (b) counseling with written warning; (c) retraining; (d) reassignment or demotion; and (e) termination of membership/employment (or arrangement with an independent contractor).
2. When the determination is made that a compliance violation has occurred, the Compliance Officer will notify the Chairperson or representative for independent contractors. If contact with the Chairperson would hinder the procedure, the Compliance Officer must notify the entire Board before the next regularly scheduled meeting when a full report of compliance-related disciplinary actions would normally be presented.
3. The Compliance Officer and Chairperson or Board members shall work in collaboration with the appropriate supervisor/manager in determining disciplinary action related to an instance of non-compliance. The Compliance Officer shall have the discretion to recommend a disciplinary process other than the normal procedure.
4. The Compliance Officer and/or and Chairperson or Board members shall consult with the outside legal counsel, as necessary, to determine the appropriate disciplinary action to be taken.
5. The Chairperson or Board members are responsible for reporting disciplinary actions taken as a result of violations of OJNA's Code of Conduct and/or Corporate Compliance Program to the Compliance Officer.
6. The Compliance Officer shall maintain a written record of all disciplinary actions, including verbal warnings, related to compliance violations and report regularly to the Corporate Compliance Committee and not less than annually to the Board of Directors regarding such actions.
7. The Compliance Officer will reference the record of disciplinary actions as necessary to ensure consistency in the application of disciplinary measures related to compliance violations.

C. Termination of Employment

1. Employment is considered “at will,” and either party may terminate upon thirty (30) days prior written notice.
2. OJNA may terminate any employee that breaches a provision in this Corporate Compliance manual and fails to cure such breach immediately.
3. Upon the termination, the member or employee shall immediately return to OJNA all information, material or property including without limitation, printouts, manuals, reports, letters, memos, plans, diagrams, and laptop computers either belonging to or the responsibility of OJNA and all copies of that material, which are in possession or under member/employee control.

D. Termination of Membership

The Board will meet and vote on termination of the membership of any member or employee if he or she is in violation of the policies of the Organization. A member shall have the opportunity to present evidence in defense of the violation.

X. Identification of Compliance Risk Areas and Non-Compliance

OJNA, in developing and implementing a Compliance Program, endeavors to detect non-compliance through any mechanism; e.g., compliance auditing procedure and/or confidential reporting, training and institution of a non-retaliation policy. OJNA is dedicated to the resolution of such matters and will take all reasonable steps to prevent further similar violations, including any necessary modifications to the Compliance Plan.

A. Policy

1. OJNA will conduct ongoing auditing and monitoring of identified risk areas related to compliance including, but not limited to, billing, fiscal management, clinical operations and service provision.
2. OJNA is committed to prompt, complete and accurate billing of all services provided to individuals. OJNA and its officers, members, employees, contractors, and agents shall not make or submit any false or misleading entries on any claim forms. No member, employee, contractor or agent shall engage in any arrangement or participate in such arrangement at the direction of another person, including any supervisor or manager, which results in the submission of a false or misleading entry on claims forms or documentation of services that result in the submission of a false claim.
3. This policy applies to all members and employees, including management, contractors and agents.

B. Procedures

1. On an annual basis, the Compliance Officer, in conjunction with the Chairperson and the Board of Directors, will determine the scope and format of routine audits of OJNA’s operations. The Compliance Officer will include all scheduled audits on a work plan that is shared with the Board of Directors.

2. The Compliance Officer will recommend and facilitate auditing and monitoring of the identified risk area related to compliance with laws and regulations, as well as OJNA policies, procedures and standards of conduct. Risk areas may be identified through the regular course of business, external alerts or internal reporting channels.
3. The Corporate Compliance Officer will monitor all audits of financial processes or systems with the Treasurer or external accounting team. The audits will serve to ensure that internal controls are in place so that:
 - Generally Accepted Accounting Principles (GAAP) are followed; and
 - Federal, state and local laws, regulations and requirements are met.
4. The Compliance Officer will monitor all audits of operational and programmatic issues with OJNA's Chairperson, or Board members at large if appropriate. The audits will serve to evaluate, at minimum, the following:
 - Compliance with laws, regulations and related policies and procedures governing OJNA's programs and operations;
 - Fraud and abuse issues;
 - Third party billing practices;
 - Service delivery and documentation practices;
 - Employment practices;
 - Conflict of interest;
 - Contract review;
 - Member, employee, independent contractor and related Board compliance training and education; and
 - Corporate Compliance Plan and related policies.
5. The audits and reviews will examine the OJNA's compliance with specific rules and policies through member interviews and general questionnaires (submitted to members, employees, and contractors), clinical record reviews to support claims for reimbursement, and documentation reviews. The Compliance Officer will conduct and/or oversee compliance reviews with assistance from management staff and/ or quality assurance/internal audit staff with the requisite skills to carry out the audit. Whenever feasible, the Compliance Officer will seek to have audits conducted by OJNA employees/members who are not involved in the delivery of services subject to the audit.
6. The Compliance Officer will determine the sample size and sample criteria prior to each audit. All review tools used will be standardized throughout OJNA and approved by the Compliance Officer.
7. A written report of audit findings will be forwarded to the Compliance Officer

within seven days from the completion of the internal audit.

8. The Compliance Officer will ensure that a post-audit review is scheduled to occur within six months of the completion dates specified in the Plan of Corrective Action.
9. The results of all internal auditing and monitoring activities, including records reviewed, audits results, and corrective actions, will be recorded and maintained by the Compliance Officer.
10. Any correspondence from any regulatory body charged with administering a federally or state-funded program received by any department of the Organization will be copied and promptly forwarded to the Compliance Officer for review and subsequent discussion by the Corporate Compliance Committee.
11. The Compliance Officer will be responsible to report to the board on the general status of compliance reviews, the outcome of compliance auditing and monitoring, and the corrective actions taken. The reporting will occur at the first regularly scheduled Corporate Compliance meeting after the conclusion of the audit.
12. The Compliance Officer will be responsible to report the results of auditing and monitoring activities and corrective actions at least annually to the Board of Directors. The report will also include an assessment of any compliance risks to the Organization. On a year-to-year basis, the Compliance Officer will benchmark audit results and compare results of similar audits to determine whether improvement is occurring. On an annual basis, the Compliance Officer will monitor the effectiveness of the Corporate Compliance Plan and will update compliance policies and procedures as necessary to comply with regulatory changes or industry trends. The Compliance Officer will provide a report of this review to the Corporate Compliance Committee and the Board of Directors.
13. The Compliance Officer will ensure that all employees and agents receive training related to the contents of this policy and the False Claims Act. The Compliance Officer will ensure that records are maintained to document the receipt of training.

XI. Investigation and Resolution of Compliance Issues

The implementation of the Plan is part of an effort to establish a culture within the organization that promotes prevention, detection and resolution of misconduct. This accomplished, in part, by establishing communication channels for members and employees to report problems and concerns. Members and employees are encouraged to report issues via the traditional chain of command who will report directly to the Compliance Officer. Therefore, the Compliance Officer is responsible for responding to compliance issues that are raised through the various communication channels. This policy is designed to establish a framework for managing and responding to compliance issues that are raised to the Compliance Officer.

A. Policy

OJNA will respond to reports or reasonable indications of suspected non-compliance by commencing a prompt and thorough investigation of the allegations to determine whether a violation has occurred.

B. Procedures

1. The Compliance Officer will conduct or oversee the conduction of all internal investigations involving compliance-related issues and shall have the authority to engage either inside legal counsel or outside legal counsel or other consultants, as needed. The Compliance Officer will consider whether the investigation should be conducted under attorney/client privilege.
2. Before conducting an investigation of any compliance-related issue, the Compliance Officer shall ensure a full understanding of the relevant laws, regulations, and government issuances
3. Upon report or notice of alleged non-compliance, the Compliance Officer will conduct an initial inquiry into the alleged situation. The purpose of the initial inquiry is to determine whether there is sufficient evidence of possible non-compliance to warrant further investigation. The initial inquiry may include documentation review, interviews, audit, or other investigative techniques. The Compliance Officer should:
(a) conduct a fair impartial review of all relevant facts; (b) restrict the inquiry to those necessary to resolve the issues; and (c) conduct the inquiry with as little visibility as possible while gathering pertinent facts relating to the issue.
4. If deemed appropriate, the Compliance Officer will recommend the cessation of internal activities that may be the cause of, or contribute to, the alleged non-compliance.
5. If, during the initial inquiry, the Compliance Officer determines that there is sufficient evidence of possible noncompliance of any criminal, civil, or administrative law to warrant further investigation, the issue should be turned over to legal counsel. A memorandum to this effect should be directed to legal counsel with a copy to the Chairperson and the Board of Directors. The memorandum should state whether legal counsel or the Compliance Officer would be leading the investigation. All documents produced during the investigation by legal counsel to be possibly protected from disclosure should include the notation: "Privileged and Confidential Document; Subject to Attorney-Client Privileges; Attorney Directed Work Product."
6. The Compliance Officer, in consultation with legal counsel, the Chairperson, and the Board, will evaluate the violation to determine if a voluntary self-disclosure of the violation is appropriate. In the event voluntary disclosure is appropriate or required, the Compliance Officer will consult with internal counsel or external counsel on the notification of appropriate government officials, private payers, or other entities. Notification shall be made within a reasonable time period from date of discovery and may include restitution of monies paid by the applicable federal or state Organization, payer, or other entity.

7. For investigations that do not involve legal counsel, the Compliance Officer will determine what personnel possess the requisite skills to examine the particular issue(s) and will assemble a team of investigators, as needed. The Compliance Officer will also decide whether the Organization has sufficient internal resources to conduct the investigation or whether external resources are necessary.
8. The Compliance Officer shall work with the investigation team to develop a strategy for reviewing and examining the facts surrounding the possible violation. The Compliance Officer will consider the need for an audit of billing practices and determine the scope of interviews.
9. The Compliance Officer will maintain all notes of the interviews and review of documents as part of the investigation file.
10. The Compliance Officer should ensure that the following objectives are accomplished:
 - Fully debrief complainant;
 - Notify appropriate internal parties;
 - Identify cause of problem, desired outcome, affected parties, applicable guidelines, and possible regulatory or financial impact;
 - Provide a complete list of findings and recommendations;
 - Determine the necessary corrective action measures, (e.g., policy changes, operational changes, system changes, personnel changes, training/education); and
 - Document the investigation.
11. Upon receipt of the results of the investigation, depending upon the scope and severity of the identified violations, the Compliance Officer may consult with inside legal counsel or outside legal counsel, the Chairperson, and/or the Board of Directors to determine: (a) the results of the investigation and the adequacy of recommendations for corrective actions; (b) the completeness, objectivity, and adequacy of recommendations for corrective actions; and/or (c) further actions to be taken as necessary and appropriate.
12. Upon conclusion of the investigation, the Compliance Officer will organize the information in a manner that enables the Organization to determine if an infraction did, in fact, occur. The Corporate Compliance Officer will track the investigation, responsible parties, and due dates in a compliance log. The log will include the resolution of the investigation as closed or fully resolved.
13. The Compliance Officer will be responsible for reporting the results of all investigations to the Chairperson, and the Board of Directors.
14. The Compliance Officer will inform the reporter, if known, of the conclusion of the investigation and the outcome, if appropriate.

XII. Response to Government Investigations

OJNA's Corporate Compliance Plan addresses the Organization's intent to fully comply with the law and will cooperate with any reasonable and appropriately authorized government investigation or audit by law enforcement or regulatory authorities.

OJNA directors, management, members, staff, and subcontractors may not conceal, destroy or alter any documents nor lie or intentionally make misleading statements to authorized government representatives. OJNA directors, management, members, staff, and subcontractors may not aid in any attempt to provide inaccurate or misleading information nor unreasonably delay communication of information or records to a possible violation of the law in response to a legally authorized inquiry by a government representative acting within the scope of its authority.

XIII. Summary

In summary, the Orthodox Jewish Nurses Association Corporate Compliance Plan and associated policies and procedures confirm the establishment of a Corporate Compliance Officer, Committee and a Program for effective training, education, auditing and monitoring. Effective and clear lines of communication have been established and internal investigation and disciplinary processes developed. Specific controls have been set in place to prevent and detect fraud and abuse and procedures for reporting of fraud and abuse are in place. OJNA has established a clear commitment to compliance.

NOTE: Employment, membership, and involvement in an OJNA committee is contingent on employee/member's adherence to this Corporate Compliance Plan.

June 26, 2019

ADOPTED BY UNANIMOUS ASSENT OF THE BOARD OF DIRECTORS OF ORTHODOX
JEWISH NURSES ASSOCIATION ON JUNE 26, 2019

FOR THE BOARD,

Elisheva Rosner

Elisheva Rosner, President