



Corporate Compliance

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Phone: 973-754-5500

To: St. Joseph's Health Trustees, Employees, Contractors, Vendors and Agents

From: Moira K. Connolly, MSN, Esq., VP & Chief Compliance Officer

Date: February 12, 2021

Subject: The Federal Deficit Reduction Act of 2005, 42 U.S.C. §1396(a)(68)

Section 6032 of the Federal Deficit Reduction Act of 2005 ("DRA") requires St. Joseph's Health to assist in preventing, detecting and addressing fraud, waste and abuse in federal health care programs by taking certain actions, including establishing written policies for employees, contractors and agents that provide detailed information about federal and state false claims statutes and penalties, and whistleblower protections.

SJH has established written policies and is making them available to you as required by the DRA. The policies are:

- **False Claims Liability, Anti-retaliation Protections, And Detecting And Responding To Fraud**
- **Sanction And Exclusion List Monitoring**

These policies are also available in PolicyManager which is accessible on the SJH intranet as well as on the SJH website at <https://stjosephshealth.org/corporate-compliance>.

St. Joseph's Health is committed to conducting business in an ethical and honest manner and within the bounds of the law. The Corporate Compliance Program has been established to prevent the occurrence of illegal or unethical behavior, to stop any such behavior as soon as reasonably possible after it has been discovered, to discipline the individuals involved (including those who know of violations but fail to report them), and to recommend and implement changes in policy and procedure necessary to avoid a recurrence of any prior violation.

SJH encourages individuals to bring forward information and/or complaints about violations of state or federal law, SJH policy, rules or regulations. Questions or concerns about potential violations may be addressed to a supervisor or department head as well as directly to the Corporate Compliance Department at 973-754-2859. SJH also has a dedicated Compliance Hotline for employees and other individuals to report compliance concerns. The hotline can be accessed 24 hours per day, 7 days per week by phone at 844-300-107 or online at <http://stjosephshealth.ethicspoint.com/>.