MEMBERS OF THE ROWAN SCHOOL OF OSTEOPATHIC MEDICINE COMMUNITY:

The State of New Jersey has entrusted the Rowan University School of Osteopathic Medicine (RowanSOM) with the responsibility of providing high quality education, health care, and research and for assuring that the highest standards of ethical conduct and integrity are practiced in carrying out these responsibilities.

Trustworthy conduct, respectful behavior, accountability, fair and just actions, compassion, good citizenship, and responsible management are the values and expectations that guide and direct the RowanSOM community. These values are the foundation of the RowanSOM Code of Conduct and apply to every member of our community, from students to executive management to the Board of Trustees. Rowan University is excited to embrace and continue supporting such solid values.

Our obligation and responsibility as members of this community is to uphold and embody the tenets established by this Code of Conduct. By doing so we earn the trust and respect of the community we serve.

Ali Houshmand, Ph.D.

President of Rowan University
**Purpose**

The pursuit of Rowan University’s School of Osteopathic Medicine (RowanSOM) fourfold mission — excellence in teaching, patient care, research and public service — requires a shared commitment to the University’s core values and ethical conduct in the discharge of one’s duties, responsibilities and all other RowanSOM activities. The Code of Conduct (“Code”) is a statement of that commitment, emphasizing key aspects of dealings inside and outside the University which demand ethical and professional behavior and is intended to inform us of the basic principles which Rowan SOM requires us to follow in conducting RowanSOM business.

All members of the RowanSOM community are expected to adhere to the Code as well as to applicable laws, regulations and RowanSOM policies. The RowanSOM Community includes the Board of Trustees, the RowanSOM management, faculty, and other academic personnel, clinical staff, researchers, employees, students, contractors, agents and others associated with or supporting RowanSOM (collectively “persons associated with RowanSOM”).

The 15 Basic Tenets of the RowanSOM Code of Conduct

1. **Respect for our Clinical Mission**

RowanSOM is committed to providing high quality health care in a manner that is appropriate, medically necessary, and efficient, in accordance with current medical and ethical standards, which includes the obligation to provide medical screening exams or emergency care. RowanSOM respects the rights of patients to make choices about their own care including the right to refuse treatment. Providers inform patients and their representatives about the RowanSOM CODE OF CONDUCT alternatives and risks associated with the care they are seeking and/or which is recommended by professional staff in order to obtain informed consent. Information is provided in a language that the patient can understand.

2. **Respect for our Educational Mission**

RowanSOM is also committed to providing high quality academic services in accordance with all laws, regulations, program requirements and academic accreditation standards. We do this as faculty and as students through:

- Accurate representations of all credentials;
- Accuracy and completeness of RowanSOM records;
- Compliance with standards for maintaining intellectual property and copyrights;
- Demonstrating behavior acceptable to RowanSOM and the community at large;
- Compliance with the RowanSOM Honor Code, requirements for graduation and the Family Educational Rights and Privacy Act (FERPA). In this regard, RowanSOM students have academic responsibilities set out in various school policies, procedures, rules and regulations
collectively “Rules” — including the Honor Code. As members of the RowanSOM community, students are responsible for adhering to the School Rules and its Honor Code as a condition of continued enrollment. Violations may result in disciplinary actions that may include dismissal from the School.

- Efforts to attract and retain high quality medical and academic staff and to reward existing staff for growth and development, bearing in mind that quality medical and academic performance is directly related to the quality of the staff who provide such services.

3. **Respect for our Research Mission**

RowanSOM researchers shall conduct their research with integrity, intellectual honesty and the appropriate respect for human and animal subjects. All research involving human subjects is to be approved by institutional review boards. Similarly, all research involving animal subjects is to be approved by institutional animal care and use committees. Researchers obtaining approvals for research must comply with all the conditions imposed by the institutional committees. Research misconduct is prohibited. RowanSOM researchers are not permitted to fabricate data or results; change or knowingly omit data or results to misrepresent results in the research record; or intentionally misappropriate the ideas, writings, research, or findings of others. All those engaged in research are expected to pursue the advancement of knowledge while meeting the highest standards of honesty, accuracy, and objectivity. They are also expected to demonstrate accountability for the funds of sponsors, payors and RowanSOM, and they are to comply with specific terms and conditions of contracts and grants.

4. **Individual Responsibility and Accountability**

All persons associated with RowanSOM must meet the highest professional standards and must exercise responsibility appropriate to their position and delegated duties. All University business is expected to be conducted in accordance with the University’s mission and this Code of Conduct, and in a manner exercising sound judgment and serving the best interests of the institution, the community and the State of New Jersey. We are responsible to one another both for actions and inactions and are responsible to cooperate with all internal inquiries in order to resolve detected or reported issues. To this end, all persons shall have compliance with this Code of Conduct as part of their annual performance appraisal, to the extent that these persons are eligible for annual performance appraisals.

5. **Respect for Others**

RowanSOM is committed to treating everyone with respect and dignity, and, among other things, to:
  - prohibit discrimination or harassment;
  - have zero tolerance for workplace violence;
• provide equal opportunities for all members of the University community and job applicants regardless of race, color, national origin, religion, sex, gender identity and expression, pregnancy, physical or mental disability, ancestry, marital status, civil union or domestic partnerships, age, genetic information, sexual orientation, or military or veteran status. Those who experience or observe discrimination, harassment, and/or workplace violence should report the incident(s) to their supervisor (or in the case of students to their faculty advisor) or to the Ethics Helpline.
• acknowledge that although consensual relationships between persons are within the realm of individual privacy, these relationships may expose RowanSOM to potential liability. Persons in these relationships in supervisory or management roles have a responsibility to discuss with their immediate superior whether the relationship poses any conflict, so that the University may take steps to eliminate the conflict in accordance with its policies.
• commit to creating and maintaining a safe and healthful work environment. All persons are expected to comply with all safety and health standards.
• expect persons providing medical and clinical services to be committed to the ethical and compassionate treatment of patients/clients and to follow established policies and statements of patient/clients rights in support of this principle.

6. Respect for ROWAN SOM and State Resources

All persons associated with RowanSOM are caretakers of the University’s and of the State’s resources. Persons must thus exercise reasonable care in the use of RowanSOM and State property and must report any damage or misuse to appropriate RowanSOM officials. RowanSOM resources, including but not limited to cash, property, facilities, intellectual property rights, patient and student records, name and logo, information technology and electronic resources, may only be used for activities on behalf of the University and not for private gain or personal purposes.

RowanSOM shall respond promptly with discipline for willful or negligent damage to RowanSOM property; theft or dishonesty; unauthorized use of RowanSOM vehicles, mail services, identification and credit cards, telephones, computers or computer equipment, or other RowanSOM equipment or materials; and tampering with or destroying RowanSOM data, records or other information, gaining unauthorized access to such information, disclosing confidential information, or otherwise misusing RowanSOM data or information.

Computers and computer accounts are provided to persons to assist them in the performance of their jobs. Persons do not have a right to privacy in anything they create, send or receive on the computer. RowanSOM has the right to monitor, for any reason, any and all aspects of any RowanSOM computer system, including employee e-mail.

Persons may not solicit, collect money, or circulate petitions on RowanSOM property at any time unless it is expressly allowed under current RowanSOM policies or by law.
7. **Compliance with Applicable Laws and Regulations**

Persons are expected to comply with the laws and regulations bearing on their areas of responsibility. Many of the laws and regulations are unique to health care, research and higher education, and many, but not all, are embodied in RowanSOM policies. Failure to comply can have serious adverse consequences both for individuals and for RowanSOM in terms of reputation, finances and the health and safety of the community. RowanSOM business is to be conducted in conformance with legal requirements, including contractual commitments undertaken by individuals authorized to bind RowanSOM to such commitments. The Office of General Counsel has the responsibility to work with departments to provide legal guidance and opinions.

8. **Compliance with Applicable RowanSOM Policies, Procedures, Codes and Other Forms of Guidance and Avoidance of Conflicts of Interest**

Policies and procedures for RowanSOM are designed to guide our everyday job activities and to give persons a clear understanding of expectations for work-related behavior. Persons are expected to seek clarification of a policy, procedure or other directive which they believe is unclear, outdated, or at odds with RowanSOM objectives or applicable laws or regulations. It is not acceptable for persons to ignore or disobey policies with which they may disagree. In addition, persons are expected to keep current with updates and revisions to RowanSOM policies and procedures.

Some persons must also comply with all ethical codes or standards of their professions or disciplines. They are expected to comply with those codes and standards, in addition to complying with all applicable RowanSOM policies and procedures.

Persons must comply with specific and/or specialized codes of conduct developed by RowanSOM, such as the Financial Aid Code of Conduct, the Codes of Conduct for Research or Codes of Conduct for specific departments.

Persons associated with RowanSOM are expected to devote primary professional allegiance to RowanSOM and to the missions of teaching, patient care, research and public service. Outside employment must not interfere with RowanSOM duties and must be disclosed to and approved by RowanSOM on an annual basis before such outside employment is accepted. Outside professional activities, personal financial interests, or acceptance of benefits from third parties can create actual or perceived conflicts between RowanSOM's mission and an individual's private interests, and persons associated with RowanSOM are expected to disclose them in compliance with applicable conflict of interest laws, regulations and policies.

Practices such as accepting from industry small gifts or pharmaceutical samples; support for resident/continuing medical education; funds for physician travel, speakers’ bureaus, ghostwriting, consulting; and clinical trials and research contracts may pose challenges to professional or business ethics, especially in an academic health center environment. To avoid the appearance of or actual
impropriety and to ensure that healthcare professionals always put the best interests of their patients first, avoid bias in decision-making, and adhere to the principles of scientific integrity, persons associated with RowanSOM shall truthfully and accurately provide disclosures to RowanSOM and to patients regarding industry relationships to ensure that those relationships between faculty and industry are at arm’s length.

In all such matters, persons associated with RowanSOM are expected to take appropriate steps, including consultation with the Rowan University Ethics Liaison Officer if issues are unclear, to avoid both conflicts of interest and the appearance of such conflicts. Questions involving scholarly, academic and research activities may also be referred to the Academic Affairs office and/or the Research Office, for appropriate advice.

9. **Compliance with the New Jersey Conflict of Interest Laws and State Ethics Code**

As public employees, persons associated with RowanSOM must comply with State of New Jersey Conflict of Interest Laws, State of New Jersey Ethics Guidelines, and RowanSOM policy to avoid actual or perceived conflicts between their RowanSOM roles and other interests (including their personal and/or financial interests).

10. **Protecting Confidentiality and Privacy of Records**

RowanSOM is the custodian of many types of information. Persons with access to confidential, proprietary and/or private information are expected to understand and to comply with applicable laws and RowanSOM policies, procedures, directives and agreements pertaining to access, use, protection and disclosure of such information. Computer security, privacy of personal information, privacy of student information and privacy of patient information are also subject to New Jersey State law, federal laws including HIPAA, the Health Information Technology for Economic and Clinical Health Act (HITECH), and FERPA, as well as ROWAN SOM policy.

The Reference Guide contains information about RowanSOM’s patient privacy policies and privacy laws. Questions relating to the release of patient records should be directed to the RowanSOM Privacy and Security Officer or the operating unit’s Custodian of Medical Records. The public right to access information is governed by RowanSOM policies and New Jersey Open Public Records Act. Questions relating to the release of RowanSOM records should be directed to the RowanSOM Custodian of Records.

Access to student records is governed by RowanSOM policies and procedures and student privacy laws. Questions relating to the release of student records should be directed to the University Registrar or the registrar of the School.

11. **Accurate Financial Reporting**
All RowanSOM patient records, accounting and financial records, expense reports, time sheets and effort reports, and other documents including those submitted to government agencies must be accurate, clear and complete.

All published financial reports must make full, fair, accurate, timely and understandable disclosures as required under generally accepted accounting principles for government entities, bond covenant agreements and other requirements. Certain individuals with responsibility for the preparation of financial statements and disclosures, or elements thereof, may be required to attest to the accuracy of those documents.

Failure to fully comply with reporting requirements could jeopardize RowanSOM’s participation in Federal healthcare programs. In addition, individual persons may be:

• Subject to disciplinary actions, up to and including termination, for failure to comply with the reporting requirements or to report suspected violations; and
• Potentially subject to fines, penalties, revocation of licenses and accreditation, criminal and civil actions as well as exclusion from federal and state healthcare programs for failure to comply with the financial reporting rules or to report suspected violations of the Rules.

12. Need for Adherence to Internal Controls

Internal control, a major part of managing an organization, comprises the plans, methods and procedures used to meet our mission, goals and objectives. Internal controls also serve as the first line of defense in safeguarding assets and in preventing and detecting fraud, waste, abuse and possible errors. Internal controls help managers achieve desired results through effective stewardship of resources, support performance-based management and are intended to provide reasonable assurance regarding the achievement of objectives in all aspects of RowanSOM operations including the following categories:

• Effectiveness and efficiency of operations including the use of RowanSOM’s resources;
• Reliability and accuracy of financial reporting, including reports on budget execution, financial statements and other reports for internal and external use; and
• Compliance with applicable laws and regulations.

All business units or department heads are specifically responsible for ensuring that internal controls are established, properly documented and maintained for activities within their jurisdiction and that internal controls set by the Rowan University Board of Trustees and/or Rowan University management are followed. Any person entrusted with funds, including principal investigators, is responsible for ensuring that adequate internal controls exist over the use and accountability of such funds and to adherence to internal controls which may be set by the Board or management.

13. Fair Dealing in Agreements

When we need to obtain services or goods we comply with:
• Rowan University policies governing procurement, including public bidding requirements and New Jersey laws, where applicable;
• The Rowan University policies relating to potential vendors;
• The federal and state laws relating to anti-referral and anti-kickback arrangements;
• Laws that prevent us from doing business with excluded individuals or companies; and
• Other state and federal laws that may require that certain terms and conditions be included in our agreements.

Rowan University is committed to competitive bidding for the procurement of goods and services, except in limited situations permitted by statute and/or University policies. Vendors are to be evaluated and selected on the basis of quality, technical excellence, delivery, cost-effectiveness and appropriateness for the identified task or need, in accordance RowanSOM policies and New Jersey laws where applicable. All RowanSOM agreements are to be managed in a fair and reasonable manner, free from conflicts of interest and consistent with all applicable laws and good business practices.

The highest ethical standards must be adhered to in all RowanSOM business arrangements for selection, negotiation, determination of awards and the administration of all purchasing activities.

Persons affiliated with RowanSOM have an obligation to be honest, consistent and truthful in all marketing and advertising practices pertaining to the business of RowanSOM’s academic health centers and health systems and to adhere to fair business practices.

14. Full compliance with all state and federal healthcare program statutes, regulations, directives and guidelines

Federal and state healthcare programs like Medicare and Medicaid require RowanSOM to comply with all applicable statutes, regulations, directives and guidelines, including the rules of Medicare fiscal intermediaries or carriers, RowanSOM policies and procedures and any agreements that RowanSOM may enter into with state or federal organizations or regulatory agencies (collectively, “Rules”). Persons affiliated with RowanSOM may be required to attest to their and RowanSOM’s compliance with the Rules, because, among other things, failure to fully comply with the Rules could jeopardize RowanSOM’s participation in these healthcare programs.

When providing clinical patient care that may be submitted for payment to private or public payors, persons are required to:
• Provide only such clinical care as is medically necessary;
• Submit timely and accurate bills for payment and accurate cost reports;
• Follow up to make sure that payments to ROWAN SOM are paid in a timely fashion;
• Report all suspected violations of Rules immediately when there are allegations of patient harm; and
• Report all suspected violation of Rules no later than thirty (30) days.
Persons affiliated with RowanSOM may be subject to disciplinary actions, up to and including termination for failure to comply with the Rules or to report suspected violations of the Rules as well as being subject to fines, penalties, revocation of licenses and accreditation, criminal and civil actions as well as exclusion from federal and state healthcare programs.

Persons affiliated with RowanSOM are subject to periodic background checks. In accordance with Federal law, RowanSOM will not employ or enter into contracts with any individual or entity currently excluded by the Office of the Inspector General (OIG) and/or the General Service Administration (GSA) from participation in Federal health care programs. If it is determined that an employee, a non-employee provider with current clinical privileges, or an individual or entity with a contractual relationship with RowanSOM is on the exclusions lists, the employment and/or contractual relationship shall be immediately terminated.

15. Protection from Retaliation

In accordance with the RowanSOM “Reporting Compliance and Ethics Concerns Policy” persons affiliated with RowanSOM are required to report all known or suspected improper activities to appropriate authorities, and persons who report such misconduct are to be protected from retaliation.

The Code of Conduct is reviewed annually and necessary changes are recommended to the Rowan University Board of Trustees for consideration and if appropriate, adoption.

For more information please contact:

RowanSOM – Compliance/Ethics Department

Ray Braeunig – 856-566-6136
40 East Laurel Road
UEC-1031
PO Box 1011
Stratford, NJ 08084

To report any complaint please call:
1-855-431-9967