



Institutional Policy

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Approver(s): Alicia Christensen

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ABOUT THIS DOCUMENT

Purpose

National Jewish Health (NJH) is committed to establishing and observing high standards of ethical conduct in business and operational practices. NJH extends this commitment to all contractors and vendors conducting business with NJH. NJH requires these individuals and organizations to comply with applicable state and federal laws and regulations.

Scope

All NJH workforce members including officer, manager, faculty, affiliates, volunteers and others working at or on behalf of NJH, whether or not they are paid by NJH.

CONTENT

Policy

As recipients of federal health care program funds, including Medicare and Medicaid, NJH will not employ, affiliate, or contract with, or otherwise enter into or continue any relationship, whether or not billing or payment are involved, with any person or entity excluded or otherwise ineligible to participate in federal health care programs. NJH will check vendors against appropriate lists to verify they are not excluded prior to hire and monthly thereafter.

Vendors that have not been excluded from federal health care programs may work and become affiliated with NJH with the expectation that they will comply with NJH Code of Conduct and Compliance policies, procedures and requirements.

Procedure

All new and potential NJH vendors will be held accountable for the requirements described in the Vendor Compliance Education document and NJH Code of Conduct. Prior to a vendor beginning work, each vendor will be checked against appropriate sanction lists in accordance with the [Identifying and Managing Excluded or Convicted Persons or Entities](#) policy. If the vendor is not excluded and affiliation or work develops, the vendor will continue to be checked monthly in accordance with the policy.

All vendors will receive copies of the Vendor Compliance Education document and Code of Conduct prior to hire. Vendors will also be subject to annual auditing for compliance with these requirements.

[Accountability](#)

All Business Units are expected to comply with Legal Affairs compliance requests. Any vendor who has been found to be in violation of NJH expectations are subject to corrective action up to and including termination. Any relationships or agreements with a vendor that have been found to be excluded from Federal health care programs will be terminated.

VERSION CONTROL

[Version Change Summary](#)

New Document reviewer revisions accepted.

[Supersedes:](#) Not Set