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INTRODUCTION

The Fraud, Waste and Abuse Policy is being implemented at New Jersey City University (NJCU) to comply with the Public Company Accounting Reform and Investor Protection Act of 2002 (Sarbanes Oxley Act of 2002) and the New Jersey State Statutes. Title VIII, Section 806 of the Sarbanes Oxley Act of 2002 and NJSA 34:19-1 provide protection to any employee who provides evidence of fraud, waste or abuse at an organization.

PURPOSE



business relationship, or, in the case of an employee who is a licensed or certified health care professional, provides information to, or testifies before, any public body conducting an investigation, hearing or inquiry into quality of patient care;
or

c. Objects to, or refuses to participate in, any activity, policy or practice which the employee reasonably believes:

(1) Is in violation of a law, or a rule or regulation issued under the law, or, if the employee is a licensed or certified health care professional, constitutes improper quality of patient care;

(2) Is fraudulent or criminal; or

(3) Is incompatible with a clear mandate of public policy concerning the public health, safety or welfare.

NJCU will ensure that the following policy elements are developed:

- There is a confidential avenue for reporting suspected fraud, waste or abuse.
- There is a process to thoroughly investigate any reports.
- There is a process for disseminating the findings from the investigation.
- The employee filing the complaint will not be subjected to termination, firing, harassment, or refused of promotional opportunities.
- Even if the findings do not support the nature of the complaint, the employee who made the complaint will not face any retaliations or repercussions.

KEY PERFORMANCE INDICATORS

The success of the policy will be assessed annually using the following quantifiable measures:

1. Communicate the policy to all employees and board members.
2. Review the number of complaints reported and investigated with management and the Finance, Audit and Planning Committee.
3. Ensure the complaints are investigated promptly and respond to the individuals making the complaint within four to six weeks.



PROCEDURES

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