



Anti-Kickback policy

The Federal Anti-Kickback Statute (42 USC § 1320a-7b(b)) makes it a criminal offense to knowingly and willfully offer, pay, solicit, or receive any “remuneration” to induce or reward referrals of items or services reimbursable by a Federal health care program (such as Medicaid). The Anti-Kickback Statute imposes criminal liability to parties on both sides of an impermissible “kickback” transaction. For purposes of the anti-kickback statute, “remuneration” includes the transfer of anything of value, directly or indirectly, overtly or covertly, in cash or in kind. There are New Jersey State laws and regulations similar to the Federal Anti-Kickback Statute.

Partners for Kids and Families (PFKF) has enacted this Anti-Kickback Policy to promote compliance with the Anti-Kickback Statute and similar state laws and regulations. PFKF employees, interns, volunteers, or Board members are prohibited from offering or receiving “compensation” of any kind from any system partner, vendor, or any other person for receiving preferential treatment of any kind.

For the purposes of this policy, “compensation” means any money, fee, commission, credit, gift, gratuity, object of value, offer of employment, or compensation of any kind for obtaining or rewarding favorable treatment in connection with PFKF’s business practice.

PFKF policy prohibits any employee, intern, volunteer, or Board Member from:

- Providing or attempting to provide or offering to provide any compensation
- Soliciting, accepting or attempting to accept any compensation; or
- Including, directly or indirectly, the amount of any compensation in any contract awarded by PFKF

Any PFKF employee, intern, volunteer, or Board Member found to be in violation of this Anti-Kickback Policy will be subject to disciplinary action up to and including termination of employment and may also be subject to additional civil or criminal penalties under applicable laws.