

AltaMed



Business Code of Conduct

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Introduction to the Business Code of Conduct

The Business Code of Conduct defines and establishes AltaMed's ethical standards and affirms AltaMed's commitment to compliance. The Business Code of Conduct applies to all board members, employees, contractors and all other representatives of the organization. The Business Code of Conduct is to be adhered to when conducting business for AltaMed on a daily business. The Business Code of Conduct should be referred to whenever possible with standards incorporated into annual employee evaluations.

THE BUSINESS CODE OF CONDUCT REFLECTS ALTAMED'S CORE VALUES WHICH ARE:

- Patients always come first
- Employees are our most valuable asset
- Encourage process, excellence and innovation for quality outcomes
- Promote wellness and advocate for strong and healthy communities
- Integrity, honesty, and respect in all of our endeavors
- Commitment and teamwork

THE PURPOSE OF THE BUSINESS CODE OF CONDUCT IS TO:

- Establish professional business conduct expectations for all board members, employees, contractors and all other representatives of the organization
- Confirm that AltaMed and its employees demonstrate a strong commitment to upholding and supporting compliance with all required standards and expected conduct
- Present specific guidelines to adhere to when conducting business for AltaMed
- Provide processes and standards for proper decision making and conduct
- Elevate corporate performance in daily operations and business relationships

Introduction to the Compliance Program

The Compliance Program is owned by the organization as a whole and includes efforts performed by all AltaMed employees, Board members and associated third parties. The Compliance Department is responsible for guiding and driving collaborative partnerships with business stakeholders to implement, “The Seven Fundamental Elements of an Effective Compliance Program:”

1. Implementing written policies, procedures and standards of conduct.
2. Designating a compliance officer and compliance committee.
3. Conducting effective training and education.
4. Developing effective lines of communication.
5. Conducting internal monitoring and auditing.
6. Enforcing standards through well-publicized disciplinary guidelines.
7. Responding promptly to detected offenses and undertaking corrective action.

¹ Health Care Prevention and Enforcement Action Team (HEAT). Office of Inspector General. US Department of Health and Human Services. (2017, May 22) “Operating an Effective Compliance Program.” <https://www.oig.hhs.gov/compliance/provider-compliance-training/files/OperatinganEffectiveComplianceProgramFinalBR508.pdf>

Compliance Strategy, Vision and Mission

Compliance Strategy, Vision and Mission

VISION

To establish and execute a leading Compliance Program that:

- Meets all laws, regulations, standards, requirements, rules and expected conduct around regulatory compliance
- Publishes appropriate reporting to the Board
- Exemplifies the attributes of high performance recognized by leading Compliance functions

This will enable the Compliance Department to be a business partner and advisor to Operations such that leadership, management and employees alike seek the guidance of the Compliance Department on appropriate risks and issues. The Compliance Department aims to foster an environment of accountability for compliance.

MISSION

AltaMed's Compliance Department provides the organizational framework and oversight mechanisms to prevent, detect, respond, mitigate and monitor potential instances of non-compliance. Further, Compliance delivers the tools to help the business understand applicable regulations and the implications of non-compliance.

DUTIES OF THE OFFICE OF COMPLIANCE

AltaMed always has been committed to conducting its activities with integrity and in accordance with all federal, state and local laws, regulations and standards to which it is subject. AltaMed's Compliance Program was created to continue that tradition. Duties of the Chief Compliance Officer through the Office of Compliance include but are not limited to:

- Execution of compliance strategy and functions across the enterprise;
- Guidance to the CEO, Board and Senior Leadership team on matters relating to reporting and compliance
- Collaboration with senior leadership and operational business units to build and drive a culture of compliance throughout the organization
- Independent review and evaluation of compliance issues and concerns within the organization
- Sponsorship of the Business Code of Conduct to ensure relevance in providing guidance to all board members, employees, contractors and all other representatives of the organization
- Implementation of an effective compliance communication program for the organization, including promoting: (a) use of the compliance hotline; (b) heightened awareness of Code of Conduct; and (c) understanding of new and existing compliance issues and related policies and procedures

DUTIES OF THE COMPLIANCE COMMITTEE

The Compliance Committee (the “Committee”) has general oversight responsibility to oversee the implementation of Corporate Compliance Program, advising and providing feedback to the Chief Compliance Officer and the Office of Compliance and Risk Management regarding compliance program activities and policies and procedures designed to respond to the various compliance and regulatory risks. Further, the Corporate Compliance Committee will assist the Board of Directors, through ongoing reports to the Board Compliance Committee, in fulfilling its oversight responsibility for AltaMed’s Corporate Compliance Program.

1. Ongoing evaluation of potential areas of compliance vulnerability as perceived or observed by executives, management, and employees.
2. Ensuring proper evaluation of the effectiveness of AltaMed’s Compliance Program.
3. Driving day-to-day compliance throughout the Company in general and in areas of responsibility, in particular.
4. Maintain awareness to identify, communicate and address potential and actual compliance issues, and improving the skills of employees in identifying and addressing compliance issues.
5. Providing an appropriate infrastructure throughout the enterprise for the administration of the Compliance Program including processes and systems to support the program.
6. Strengthening AltaMed’s Business Code of Conduct, including providing a method for its periodic review and update to ensure its continued applicability to employees.

**Business Code of
Conduct Approval by
Governing Body**

Business Code of Conduct Approval by Governing Body

The Chief Compliance Officer, through the Vice President of Compliance, will review and update the Business Code of Conduct on, at minimum, an annual basis. The President & CEO, General Counsel, and the Corporate Compliance Committee will provide input on material changes to the Business Code of Conduct. The Office of Compliance will provide periodic reports to the Board of Directors, through the Board Compliance Committee, on Compliance Program activities, including issues identified, investigated and resolved by the Compliance Program.

Employee Responsibilities

Employee Responsibilities

ADHERENCE TO THE BUSINESS CODE OF CONDUCT

AltaMed's policy is to promote ethical and lawful behavior as stated in the standards of the Business Code of Conduct. All AltaMed personnel must comply with the Business Code of Conduct standards, seek clarification through the Office of Compliance when questions or issues arise and assist any other Compliance personnel in investigating any allegations of wrongdoing and in the resolution of compliance issues. Adherence to the Business Code of Conduct is required and will be enforced through appropriate disciplinary actions when necessary.

DISSEMINATION OF THE BUSINESS CODE OF CONDUCT

The Business Code of Conduct will be disseminated and discussed with all board members, employees, and contractors during initial orientation, also known as New Hire Training, and reviewed with each member of the staff and Leadership annually during the Review Period. The Business Code of Conduct will be reinforced by all department Leadership and management on an ongoing basis.

Board members, employees, (serving in a corporate / business role) and contractors shall attest in writing that they have received, read and understand the Business Code of Conduct upon hire and annually thereafter.

VIOLATION OF BUSINESS CODE OF CONDUCT

Violation of AltaMed's Business Code of Conduct standards must be reported promptly. To obtain guidance on a compliance issue or to report a suspected violation, you may choose several options. We encourage the resolution of issues at a local level whenever possible with direct department Leadership and management. However, when an employee or contractor is uncomfortable reporting locally, they are encouraged to report directly to the Compliance Officer and/or through the Compliance Hotline:

Compliance Hotline

Telephone Number: (888) 418-1398

E-Mail Address: MyComplianceReport.com (ID is ALTA)

ANTI-RETALIATION POLICY

Retaliation against a person who makes a report in good faith will not be tolerated. Any employee who attempts to or encourages others to retaliate against an individual, who has reported a violation, will be subject to disciplinary actions up to and including termination of employment.

CORRECTIVE ACTION

Where an internal investigation substantiates a reported violation, it is the policy of AltaMed to:

- Initiate corrective action, including but not limited to immediate termination, requiring contractors to make, as appropriate, prompt restitution of any overpayment amounts
- Notify the appropriate governmental agency and/or health plan
- Institute whatever disciplinary action is necessary
- Implement systemic changes to prevent a similar violation from recurring

DISCIPLINE

Monitoring of non-compliance issues and violations will be conducted on an ongoing basis. The Office of Compliance will discuss with Legal Counsel and the appropriate supervisory person any process or policies requiring correction and/or individuals needing additional education or discipline. All violators of the Business Code of Conduct will be subject to disciplinary action. The precise discipline utilized will depend on the nature, severity and frequency of the violation, which may include by is not limited to, the following disciplinary actions:

- Verbal warning
- Written warning
- Written reprimand
- Suspension
- Termination
- Restitution

Compliance with Laws and Regulations

Compliance with Laws and Regulations

AltaMed will conduct its business with integrity, honesty, fairness and in compliance with all applicable laws and regulations. All board members, employees, and contractors must be knowledgeable about and ensure compliance with all laws and regulations applicable to his/her job function, including but not limited to the laws and regulations stated in the Business Code of Conduct. AltaMed personnel are encouraged to seek clarification when questions or issues arise that are in apparent conflict with the Business Code of Conduct or the Compliance Program.

Non-Discrimination

Non-Discrimination Regulations

No board member, employee, or contractor shall unlawfully discriminate on the basis of race, color, religion, sex (including pregnancy, childbirth, or related medical conditions), national origin, ancestry, age, physical disability, mental disability, medical condition, family care leave status, veteran status, marital status, or sexual orientation.

SAFE WORKING ENVIRONMENT

AltaMed is committed to practices that generate a safe workplace and continually works to develop and maintain a safe and healthy work environment. We encourage the reporting of any safety concerns to your immediate supervisor, particularly incidences such as:

- Injuries or other illnesses
- Hazards such as facilities and equipment malfunctions or dangers
- Security violations or criminal activity on company premises
- Actual or threatened acts of violence or intimidation

MEDICAL NECESSITY

In order to determine whether a claim should be paid, contractors apply coverage and medical necessity criteria, established by CMS regulations. Reasonable criteria are used to determine whether equipment or services were reasonable and necessary for a beneficiary's medical condition.

Services or procedures which do not fit the descriptions below would be considered unnecessary:

- Generally accepted in the medical community as safe and effective in the setting and for the condition for which it is used
- Proven to be safe and effective based on authoritative evidence
- Not experimental
- Reasonable and necessary in the particular case
- Furnished at a level, duration or frequency that is reasonably appropriate
- Furnished in accordance with accepted standards of medical practice
- Furnished in a setting appropriate to the patient's medical needs and condition

No supplies or services will be billed by AltaMed unless they are reasonable and necessary, as evidenced by a fully and accurately documented health record.

ACCURATE CLAIMS FOR REIMBURSEMENT

All claims for reimbursement to third party payers, including but not limited to Medicaid and Medicare, that are submitted on behalf of AltaMed must contain accurate and true information and must only reflect services provided as supported by the patient/participant/client's health record. For reimbursement of FQHC services, claims must be submitted under the FQHC Prospective Payment System (PPS) using the required payment codes and appropriate descriptions of services.

Examples of accurate claims for reimbursement include but are not limited to:

- Submitting claims to federally funded health care programs that correctly identify the services ordered by the physician and performed
- Accurately reporting diagnoses and procedures
- Properly recording discounts and rebates
- Billing for services provided based on medical necessity

No supplies or services will be billed by AltaMed unless they are reasonable and necessary, as evidenced by a fully and accurately documented health record.

ACCURATE BUSINESS RECORDS

It is the policy of AltaMed to create and maintain complete and accurate records. All records must accurately reflect the matter to which it pertains. No entry in any AltaMed record should disguise any material fact regarding the transaction.

Examples of accurate records include but are not limited to:

- Contacting the ordering physician to obtain diagnostic information when the physician has failed to provide such information
- Properly documenting dates and descriptions of services furnished
- Accurately translating narrative diagnoses obtained from physicians for appropriate code billing

FINANCIAL & DATA REPORTS

All cost reports, accounting records, data submissions, attestations, timesheets and other documents must be accurate and clearly represent the relevant facts and true nature of a transaction. AltaMed will only report properly allowable costs that were absolutely and reasonably incurred by AltaMed.

REFUND OF OVERPAYMENT

AltaMed will adhere to the requirements for returning overpayments to third-party payers and/or government programs. If AltaMed determines that it has received an overpayment, AltaMed will promptly refund the payment to the proper party in accordance with appropriate regulations, policies, and procedures.

Payment violations include but are not limited to:

- Continuing to bill for services when a billing issue has been identified
- Withholding amounts subject to refund
- Delaying refunds of identified overpayments

CO-PAYMENTS/DISCOUNTS

AltaMed must not waive the collection of insurer co-payment obligations unless it establishes that the patient/participant/client meets AltaMed's sliding fee scale requirements. A record of the patient/participant/client's financial indigence must be kept on file.

ETHICAL RESEARCH CONDUCT

AltaMed is committed to protecting the rights of its patients participating when participating in clinical research and/or trials, including their well-being and privacy by adhering to ethical standards and applicable policies and regulations. Ethical conduct includes but is not limited to:

- Adherence to the highest standards of honesty and integrity
- Prohibition of plagiarism, misrepresentation and falsification of data
- Compliance with applicable policies as well as requirements of research sponsors
- Adherence with regulatory standards, including protection of the rights and safety of research subjects and avoidance of conflicts of interest and scientific misconduct

HONEST DEALING WITH GOVERNMENT OFFICIALS

AltaMed will deal with government bodies and regulatory agencies in a direct, open and honest manner. No AltaMed board member, employee, or contractor will attempt to improperly influence actions or decisions made by government bodies, officials, employees or their representatives.

COOPERATION WITH GOVERNMENT AUDITS AND INVESTIGATIONS

AltaMed will be cooperative and truthful in its dealings with any governmental inquiry or request, including audits, surveys and certification reviews. If you receive a governmental request for information or if you are approached by a government investigator, contact your supervisor and the Office of Compliance and Risk Management immediately so that AltaMed can follow proper procedures in responding. In fulfilling governmental requests, it is important to be responsive and provide requested documentation in a timely manner. Respect should be shown for government officials and accurate and complete information be provided. In no circumstances, should an investigation or government official be improperly influenced or impeded.

Fraud, Waste and Abuse

Fraud, Waste and Abuse

AltaMed board members, employees, and contractors shall refrain from conduct, which would violate the fraud, waste and abuse laws, including but not limited to, the False Claims Act, Anti-Kickback Statute, Stark Law and Civil Monetary Penalties Law. AltaMed is committed to the detection, prevention and resolution of fraud, waste and abuse.

FRAUD

Fraud is the intentional deception or misrepresentation that an individual knows to be false and could result in some unauthorized benefit to himself / herself or some other person.

Fraud may occur due to a false statement or misrepresentation made or caused to be made that is material to payment under government programs. The violator may be a participating provider, a beneficiary, some other person, or business entity.

Examples of fraud may include but are not limited to:

- Incorrect reporting of diagnoses or procedures to maximize payments
- Billing for services not furnished and/or supplies not provided
- Billing that appears to be deliberate application for duplicate payment of services or supplies billing both Medicare and the beneficiary for the same service

WASTE

Waste is the overutilization of health services or other practices that, directly or indirectly, result in unnecessary costs to the health care system, including government programs. Waste is not generally considered to be caused by criminally negligent actions, but by the misuse of resources.

ABUSE

Abuse describes incidents or practices that are not usually fraudulent, but are inconsistent with accepted sound medical, business or fiscal practices. “Abuse” is used to describe incidents or practices which, although not considered fraudulent acts, may directly or indirectly cause financial losses.

FEDERAL FALSE CLAIMS ACT

The Federal False Claims Act imposes civil liability on any person who knowingly submits or causes to be submitted, a false or fraudulent claim to the federal government. The “knowing” standard includes acting in deliberate ignorance or reckless disregard of the truth or falsity of the information related to the claim.

Examples of violations of the Federal False Claims Act may include but are not limited to:

- A physician who knowingly submits claims to Medicare for medical services not provided
- An entity who submits records that are false and indicate compliance with certain contractual or regulatory requirements
- A person who obtains payment from the federal government to which he/she may not be entitled and then uses false statements or records in order to retain the payment

Individuals can be held directly liability by federal or state agencies for “knowingly” violating the False Claims Act. This can include, but is not limited to, civil penalties between \$5,000 and \$10,000, plus three times the amount of damages sustained from the federal government, and/or exclusion from participation in Medicare and Medicaid services.

ANTI-KICKBACK STATUTE

Employees or their families must not receive personal kickbacks or rebates as a result of the purchase or sale of goods or services at AltaMed. “Kickbacks or rebates” can take many forms and are not limited to direct cash payments or credits. In general, if an employee or family member stands to gain personally from a transaction, that transaction is prohibited. Such practices are not only unethical but are in many cases illegal.

Civil penalties for violating the Anti-Kickback Statute may include penalties of up to \$50,000 per kickback plus three times the amount of kickback. Criminal penalties for violating the Anti-Kickback Statute may include fines, imprisonment or both.

No AltaMed board member, employee, or contractor will offer, provide, solicit or accept anything of value from any person in return for the referral of a Medicare/Medicaid or other government sponsored patient/participant/client or in return for influencing or engaging in any related business transaction, directly or indirectly.

A limited number of “safe harbors” have been published by the Office of Inspector General to immunize certain payment and business practices that are implicated by the anti-kickback statute from criminal and civil prosecution under the statute. The Office of Compliance and/or General Counsel must be contacted to determine applicability of any safe harbors.

STARK SELF-REFERRAL LAW

In general, the Stark Self-Referral Law of the Social Security Act prohibits a physician with an ownership interest, investment interest, or compensation agreement with an entity from making referrals to that entity for the furnishing of designated health services for which Medicare payment would otherwise be made.

Penalties for physicians who violate the Stark Law may include fines as well as exclusion from participation in all Federal health care programs.

A limited number of “exceptions” have been adopted into Stark Law (42 CFR 411.357), which except certain compensation arrangements from constituting a financial relationship. The Office of Compliance and/or General Counsel must be contacted to determine applicability of any Stark Law exceptions.

CIVIL MONETARY PENALTIES

The Civil Monetary Penalties (CMP) Law imposes CMPs for a variety of health care fraud violations. Different amounts of penalties and assessments may be authorized based on the type of violation at issue. Penalties range from \$10,000 to \$50,000 per violation. CMPs can also include an assessment of up to three times the amount claimed for each item or service or up to three times the amount of remuneration offered, paid, solicited or received.

Conflicts of Interest and Private Financial Gain

Conflicts of Interest and Private Financial Gain

It is the responsibility of each board member, employee, and contractor to ensure he/she remains free of conflicts of interest in the performance of his/her job responsibilities with AltaMed. This includes remaining free of outside activities where personal interests may influence or appear to influence the ability to make objective decisions.

It is also the responsibility of each board member, employee, and contractor to disclose any actual or potential conflicts of interest to a supervisor or to the Office of Compliance and Risk Management for review to determine if the relationship warrants exception and/or restriction.

FINANCIAL INTERESTS

No board member, employee, or contractor may participate in the selection, award or administration of a contract, in which government funds are used, where he/she or his/her immediate family or partner has a financial interest.

No board member may vote on any matter which may directly or indirectly result in financial gain to him/her or which may conflict with his/her obligations to another organization's Board of Directors or to his/her employer. Provided that the board member has first disclosed a conflict or potential conflict and abstains from voting in that regard, he/she may participate in discussions relating to that matter.

GIFTS/GRATUITIES

Board members, employees, and contractors may not solicit or accept gratuities, favors or anything of value from contractors or potential contractors or vendors of AltaMed in exchange for referrals, clientele, Medicare / Medicaid services or other monetary benefit.

A gift means anything offered directly by or on behalf of a contractor or vendor other than promotional materials of little or nominal value such as a pen, calendar and other items intended for wide distribution. Gift include, but are not limited to, personal gifts, such as sporting goods; household furnishings and liquor; social entertainment or tickets to sporting events; personal loans or privileges to obtain discounted merchandise and the like.

Any board member, employee, or contractor shall decline or return any gift and notify the Compliance Officer of such gift.

HONORARIA

Employees or contractor, with permission of their supervisor, are encouraged to participate as faculty and speakers at education programs and functions. However, any honoraria in excess of \$100.00 shall be turned over to AltaMed unless the employee or contractor request paid or unpaid time off to attend the program or that portion of the program for which the honoraria is paid.

Exceptions may be made, with written approval by the CEO, prior to the event actually taking place.

COMPETITION

It is the policy of AltaMed to conduct all procurement transactions in a manner to provide, to the maximum extent practical, open and free competition. AltaMed will be sensitive to and seek to avoid organizational conflicts of interest or non-compliance practices among contractors. Consultants who want to bid for a contract from AltaMed are prohibited from drafting the contract's specifications, request for proposals and the like. Award will be made to the bidder whose bid is responsive to the solicitation and most advantageous to AltaMed, budget and other factors considered and employees.

AltaMed always retains the right to reject any and all bids when it is in AltaMed's best interest to do so.

BRIBERY

Bribes or gratuities involving public officials and the testimony of witnesses are prohibited. For each offense, a direct or indirect action to offer, promise, or give anything of value to any public official or witness, or a solicitation of anything of value by a public official or witness is prohibited. Thus, both the giver and the taker of a bribe may be sanctioned. AltaMed will immediately dismiss any employee, remove any officer or board member and terminate the contract of any contractor found to have offered or accepted a bribe to secure funding for AltaMed.

CONFIDENTIAL BUSINESS INFORMATION

All board members, employees, contractors and all other representatives of the organization may not communicate confidential information internally or externally about AltaMed absent the explicit authorization of the full Board of Directors. If, as a result of negotiations in which AltaMed is engaged in, an individual gains access to confidential information, the individual may not communicate this information to anyone without the authorization of the President. If AltaMed executes an agreement with another entity which includes provisions governing confidentiality of information, all board members, employees, contractors and all other representatives of the organization are bound by those provisions and required to comply with them.

PATIENT/PARTICIPANT/CLIENT INFORMATION

AltaMed collects information about the patient/participant/client's medical condition, history, and medication and family illnesses, known as protected health information (PHI), to provide the best possible care. AltaMed realizes the sensitive nature of PHI and is committed to maintaining its confidentiality. All board members, employees, contractors and all other representatives of the organization are expected to adhere to the Health Information Portability Accountability Act (HIPAA) Privacy requirements and AltaMed's Privacy policies & procedures.

All board members, employees, contractors and all other representatives of the organization will not:

- Release or discuss PHI with others unless it is necessary to serve the patient/participant/client or required by law or agencies with a need to know
- Disclose confidential information that violates the privacy right of our patients/participants/clients. No AltaMed employee, affiliated physician or other healthcare partner has a right to PHI other than what is necessary to perform his/her job

Patients/participants/clients can expect that their privacy will be protected and that PHI will be released only to persons authorized by law and/or by the patients/participants/clients written consent.

SECURITY OF INFORMATION

AltaMed will comply with the Health Information Portability Accountability Act (HIPAA) Security requirements and safeguard data and information against accidental or intentional unauthorized access, use, loss, destruction or disclosure. AltaMed will secure information appropriately to preserve its confidentiality.

All board members, employees, contractors and all other representatives of the organization will not violate the Health Care Theft and Embezzlement statute within HIPAA which is the:

- Knowingly and willfully embezzling, stealing, or otherwise without authority converting to the use of any person other than the rightful owner, or intentionally misapplying any of the moneys, funds, securities, premiums, credits, property, or other assets of a health care benefit program

SAFEGUARDING INFORMATION

All board members, employees, contractors and all other representatives of the organization will not violate the Health Care Theft and Embezzlement statute within HIPAA which is the:

- Properly securing property and equipment belonging to AltaMed
- Appropriate handling and disposal of confidential information
- Adhering to safety protocols when conducting business on behalf of AltaMed
- Complying with data security and privacy protocols related to PHI
- Avoiding disclosure of business information not relevant to daily job duties

**Other Applicable Laws,
Regulations and/or
Program Requirements**

POLITICAL ACTIVITIES

No employee, board member or contractor may engage in political activities during business hours. No employee, board member or contractor may use AltaMed's name, facility or resources in connection with political activities. In particular, no federal grant or related funds may be used to support the costs of prohibited lobbying activities, as defined in OMB Circular A-122, Department of Health and Human Services ("DHHS") rules implementing the Byrd Amendment and DHHS appropriations riders.

Employees, board members, and contractors may not solicit political support in any manner, which might suggest that AltaMed supports any political party or candidate. No employees, board members, and contractors shall, in any manner, solicit financial assistance or subscription for any political party, candidate, fund, publication or for any other political purpose from AltaMed employees in the workplace or otherwise in an employment-related setting. AltaMed employees may engage voluntarily in political activities outside business hours but must do so with no affiliation or connection with AltaMed or any of its affiliate entities.

Conclusion

WHERE TO GO FOR HELP

AltaMed is committed to creating an environment where anyone acting on behalf of the organization feels comfortable speaking up when there are questions or concerns. When you have an issue or concern, consult your direct supervisor. You may also seek guidance from the Office of Compliance or anonymously contact the Compliance Hotline.

Compliance Hotline

Telephone Number: (888) 418-1398

E-Mail Address: MyComplianceReport.com (ID is ALTA)



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