

Code of Conduct

Integrity, accountability,
and excellence

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Dear Kaweah Health Team Member:

We are proud to introduce you to our Code of Conduct for Kaweah Delta Health Care District (Kaweah Health). Our Code of Conduct reflects Kaweah Health's commitment to providing high-quality services to patients, and our commitment to ethical and legal business practices. These goals are vital to the ongoing success of Kaweah Health. This information booklet is an important and valuable expression of our commitment to integrity, accountability, and excellence – three of Kaweah Health's fundamental values. It has been designed to show each of us how our core values and standards go hand in hand.

Every person at Kaweah Health plays a role, directly or indirectly, in the patient experience and our reputation is based on how we conduct ourselves on a daily basis. Our reputation brings hope and confidence to patients who trust us to deliver high quality care and attracts people with the highest integrity to seek employment or affiliation with us.

The information in our Code of Conduct booklet will assist you in understanding the variety of legal, professional and ethical standards that regulate our work. Please make it a priority to become familiar with it. Much of what you see in the Code of Conduct booklet will not be new to you, but it will provide an accessible source of information when you have a question about a particular situation.

There may be times when you face a situation that is not specifically covered by the Code of Conduct. The complex challenges we face in the healthcare arena are not always easily categorized, and you may find that you need assistance in addressing a specific issue related to compliance. We encourage you to discuss the situation and initially seek guidance from your supervisor. If you are ever uncomfortable discussing the situation with your supervisor and would rather speak to our Compliance and Privacy Officer directly, you may do so by contacting the Compliance and Privacy Officer at 1-559-624-5006. If you prefer to report an issue or concern anonymously, you may call our Confidential Reporting Line at 1-800-998-8050. We will work diligently to ensure that questions and issues brought to our attention are addressed and resolved.

A commitment to ethical and legal business practices in caring for our patients and in our business dealings is crucial. Compliance means doing the right thing. I thank you for your personal commitment to compliance, our Code of Conduct and the part you play in making Kaweah Health an organization that we can all be proud of.



Sincerely,

A handwritten signature in black ink, appearing to read 'M Mertz', written over a light blue background.

Marc Mertz
Chief Executive Officer

Our Code of Conduct

PURPOSE OF THE CODE OF CONDUCT

Our Code of Conduct provides guidance to all Kaweah Delta Health Care District (Kaweah Health) employees and our care partners by creating and fostering an environment in which all stakeholders feel empowered and obligated to “do the right thing.” The Code of Conduct assists us in carrying out our daily activities and working within appropriate ethical and legal standards. These obligations apply to our relationships with patients, affiliated physicians, third-party payers, subcontractors, independent contractors, vendors, volunteers, consultants and one another.

The Code of Conduct is a critical component of our Compliance Program. We have developed the Code of Conduct to ensure we all understand our ethical obligations and standards, administrative regulations, and medical staff bylaws comply with all applicable laws and regulations. Adherence to the Compliance Program is a condition of employment at Kaweah Health. Likewise, the granting of medical staff privileges and the offer of employment at Kaweah Health is contingent upon acceptance of and compliance with the Compliance Program.

The Code of Conduct is intended to be comprehensive and easily understood. However, in many cases, the subject matter discussed may have complexities that require additional guidance and direction. To provide additional guidance, we have developed comprehensive policies and procedures which may be accessed in Kaweah Health’s Policy Tech system. The policies expand upon many of the principles communicated in our Code of Conduct. The standards set forth in the Code of Conduct are mandatory and must be followed.

KAWEAH HEALTH

Kaweah Delta Health Care District is a community venture, operating under the authority granted through the California Health and Safety Code as a health care district. As such, Kaweah Delta Health Care District is publicly owned and operates as a non-profit entity. Kaweah Health was established to provide quality health care within defined areas of expertise. Kaweah Health’s intent is that no person shall be denied emergency admission or emergency treatment based on their ability to pay. Similarly, no person shall be denied access to treatment or admission to our facilities based upon race, color, national origin, ethnicity, disability, economic, religious or age status and/or on the basis of sexual preference. The medical welfare of the community and its particular health needs will be fulfilled, to the extent possible, based upon Kaweah Health’s financial limitations.



OUR MISSION.
OUR VISION.
OUR PILLARS.

OUR MISSION STATEMENT

Health is our Passion.
Excellence is our Focus.
Compassion is our Promise.

The mission articulates the reason Kaweah Health exists

OUR VISION

To be your world-class healthcare choice, for life.

Our vision statement is what we aspire to be for our community and sets the future path and framework in our strategic planning.

OUR PILLARS

- Achieve outstanding community health
- Deliver excellent service
- Provide an ideal work environment
- Empower through education
- Maintain financial strength

Like pillars that support a structure, these efforts are foundational to the success of Kaweah Health.

Kaweah Health Compliance Program

PROGRAM STRUCTURE AND STANDARDS

The Compliance Program was developed to provide oversight of administrative compliance efforts including:

- 1 | establishing operating protocols and standards of conduct;
- 2 | designating oversight responsibilities;
- 3 | providing employee compliance training;
- 4 | monitoring and auditing;
- 5 | supporting and facilitating open lines of communication and reporting;
- 6 | following through with enforcement and disciplinary procedures; and
- 7 | establishing response and prevention plans.

The Compliance Program is intended to demonstrate in the clearest possible terms the absolute commitment of the organization to the highest standards of ethics and compliance. The elements of the program include setting standards (the Code of Conduct and Policies and Procedures), communicating the standards, providing a mechanism for reporting potential exceptions, monitoring and auditing, and maintaining an organizational structure that supports the continued growth of the program. Each of these elements is detailed below.

These elements are supported at all levels of the organization. Providing direction, guidance and oversight are the Audit and Compliance Committee of the Board of Directors and the Executive Team consisting of Senior Management.

The Compliance Officer shall have sufficient authority to fulfill the responsibilities of the position and shall have direct reporting responsibility to the CEO and the Board. The Compliance Officer shall administratively report to the CEO and provide an update to the Board annually, at a minimum, on the state of the Program.

The Compliance Officer is responsible for the day-to-day operation and oversight of Program activities. The Compliance Officer will oversee the implementation and maintenance of the Program and all Kaweah Health compliance policies, compliance education and training, auditing and monitoring activities, and resolution of compliance issues. The Compliance Officer shall have access to all documents and information related to compliance activities and may seek advice from Legal Counsel or retain consultants or experts, when necessary. The Compliance Officer may request additional staff, as deemed necessary, to assist in the performance of compliance activities.

The Compliance Team plays a key role in ensuring the successful implementation of our Compliance Program. They are responsible for distributing standards, ensuring training is conducted, conducting monitoring and responding to audits, investigating and resolving Confidential Reporting Line issues and otherwise administering the Compliance Program.

Another important resource to address issues related to this Code of Conduct is the Human Resources Department. Human Resources staff are highly knowledgeable about many of the compliance risk areas described in this Code of Conduct, particularly those that pertain to employment and the workplace. The Human Resources staff are responsible for ensuring compliance with various employment laws. If a concern relates to specific details of an individual's work situation, rather than larger issues of organizational ethics and compliance, the Human Resources Department is the most appropriate area to contact. In that we promote the concept of management autonomy, every effort should be made to resolve workplace conduct and employment practice issues through the individual's supervisor. However, the Human Resources Department is also available to provide support to employees and management.

RESOURCES FOR REPORTING A CONCERN

To obtain guidance on an ethical or compliance issue or to report a concern, individuals may choose from several options. We encourage the resolution of issues,

including human resources-related issues (e.g., payroll, fair treatment and disciplinary issues). It is an expected good practice, when one is comfortable with it and thinks it appropriate under the circumstances, to raise concerns first with one's supervisor. If it is uncomfortable or inappropriate, the individual may discuss the situation with the Compliance and Privacy Officer (559) 624-5006 or the Human Resources Department. If the issue is employee relations in nature, employees should contact the Human Resources Department for assistance and further guidance. Individuals are always free to contact the Confidential Reporting Line at 800-998-8050.

Kaweah Health makes every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports concerns or possible misconduct. There is no retribution or discipline for anyone who reports a concern in good faith.

Any employee who deliberately makes a false accusation with the purpose of harming or retaliating against another employee is subject to discipline.

PERSONAL OBLIGATION TO REPORT

We are committed to ethical and legal conduct that is compliant with all relevant laws and regulations and to correcting any wrongdoing whenever it may occur in the organization. Each employee has an individual responsibility for reporting any activity by any employee, physician, subcontractor, or vendor that appears to violate applicable laws, rules, regulations, accreditation standards, medical practice standards, Federal Healthcare Conditions of Participation or the Code of Conduct. If a matter posing serious compliance risk to the organization or involving a serious issue of medical necessity, clinical outcomes or patient safety is reported, and if the reporting individual doubts that the issue has been given sufficient or appropriate attention, the individual should report the matter to higher levels of management, the Director of Risk Management, the Compliance and Privacy Officer or the Confidential Reporting Line until satisfied that the full importance of the matter has been recognized.

QUESTIONS CONTACT:

**Kaweah Health Compliance
and Privacy Officer**
(559) 624-5006

**Kaweah Health Compliance Advocate/
Kaweah Health Legal Counsel**
(559) 738-8100 or (559) 280-3075

Confidential Reporting Line
1 (800) 998-8050

INTERNAL INVESTIGATIONS

We are committed to investigating all reported concerns promptly and confidentially to the extent possible. The Compliance and Privacy Officer coordinates findings from investigations and immediately recommends corrective action or changes that need to be made. When an investigation is initiated based upon a report of a problem by an employee, the final resolution of the issue will be reported back to that employee. We expect all employees to cooperate with investigation efforts. Giving false or misleading information during an investigation may lead to disciplinary action, up to and including termination.

CORRECTIVE ACTION

Where an internal investigation substantiates a reported violation, it is the policy of the organization to initiate corrective action, including, as appropriate, making prompt restitution of any overpayment amounts, notifying the appropriate governmental agency, instituting disciplinary action as necessary and implementing systemic changes to prevent a similar violation from recurring in the future.

DISCIPLINE

All violators of the Code of Conduct will be subject to disciplinary action. The seriousness of the offense and frequency of the violation precise discipline utilized and frequency of the violation may result in any or all of the following disciplinary actions:

- Written Warning
- Written Reprimand
- Suspension
- Termination and/or
- Restitution

TRAINING AND EDUCATION

Training and education have been developed to ensure that employees throughout the organization are aware of the standards that apply to them. Code of Conduct training is conducted at the time an individual joins the organization and is communicated regularly to all employees.

Compliance training in areas of specific compliance risk (e.g., billing, coding, cost reports) is required of certain individuals. Kaweah Health policies outline the training requirements.

All Staff and Board Members shall receive on-going education about relevant compliance topics including updates to the Compliance Program, Code of Conduct, new laws and regulations, or new Compliance and Privacy policies and procedures.

Many resources regarding our program are available to all Kaweah Health employees on our Intranet and to the general public on the Internet.

MEASURING PROGRAM EFFECTIVENESS

We are committed to assessing the effectiveness of our Compliance Program through various efforts. Our efforts are supported in part by the Internal Audit Department, which routinely conducts internal audits of issues that have regulatory or compliance implications. Responsible Executives and management routinely undertake

monitoring efforts in support of policies and compliance in general. Departments conduct self-monitoring, and the Compliance Department conducts reviews designed to assess facility implementation of the Code of Conduct, policies and procedures, Confidential Reporting Line and related investigations, and monitoring efforts. Most of these methods of assessment result in reports of findings by the reviewers and corrective action plans by the departments that are reviewed. Through these reviews, we are continuously assessing the effectiveness of the Program and finding ways to improve it.

LEADERSHIP RESPONSIBILITIES

While all Kaweah Health employees are obligated to follow our Code of Conduct, we expect our leaders to set the example, and in every respect to be a model for others. We expect everyone at Kaweah Health with supervisory responsibilities to be kind, sensitive, honest, thoughtful and respectful. We expect all leaders to create an environment where each team member feels free to raise concerns and propose new ideas.

We also expect that leadership will provide their team members with sufficient information to comply with laws, regulations, policies and procedures, and will provide the resources to address and resolve ethical dilemmas. They must help to create and maintain a culture that promotes the highest standards of ethics and compliance. This culture must encourage everyone in the organization to share concerns when they arise. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

Kaweah Health Leaders at all levels should use all available education and guidance to most effectively incorporate ethics and compliance into all aspects of Kaweah Health.

OUR FUNDAMENTAL COMMITMENT

We are committed to providing Personal, Professional, Compassionate Experiences, Every Person Every Time and specifically:

To our patients:

We are committed to providing safe, high quality care that is sensitive, compassionate, promptly delivered, and cost effective.

To our employees:

We are committed to a working environment which treats all employees with fairness, dignity and respect, and affords them an opportunity to grow and develop professionally, and to work in a team environment in which all ideas are considered.

To our affiliated physicians:

We are committed to providing a work environment which has excellent facilities, equipment and outstanding professional support.

To our third-party payers:

We are committed to working with our third-party payers in a manner that demonstrates our commitment to contractual obligations and reflects our shared concern for quality healthcare and bringing efficiency and cost effectiveness to healthcare. We encourage our payers to adopt their own set of ethical practices to recognize their obligations to patients and providers and the need for fairness and responsiveness.

To our regulators:

We are committed to maintaining an environment of compliance with rules, regulations, policies and sound business practices. We accept the responsibility to self-govern and monitor adherence to the requirements of the law and to our Code of Conduct.

To our joint venture partners:

We are committed to fully performing our responsibilities to support our jointly owned services in a manner that reflects the mission and values of each of our organizations.

To the communities we serve:

We are committed to understanding the needs of the communities we serve and to providing high quality, cost-effective healthcare. We realize that we have a responsibility to those in need. We proudly support charitable contributions and community events in an effort to promote goodwill, health and other good causes.

To our suppliers:

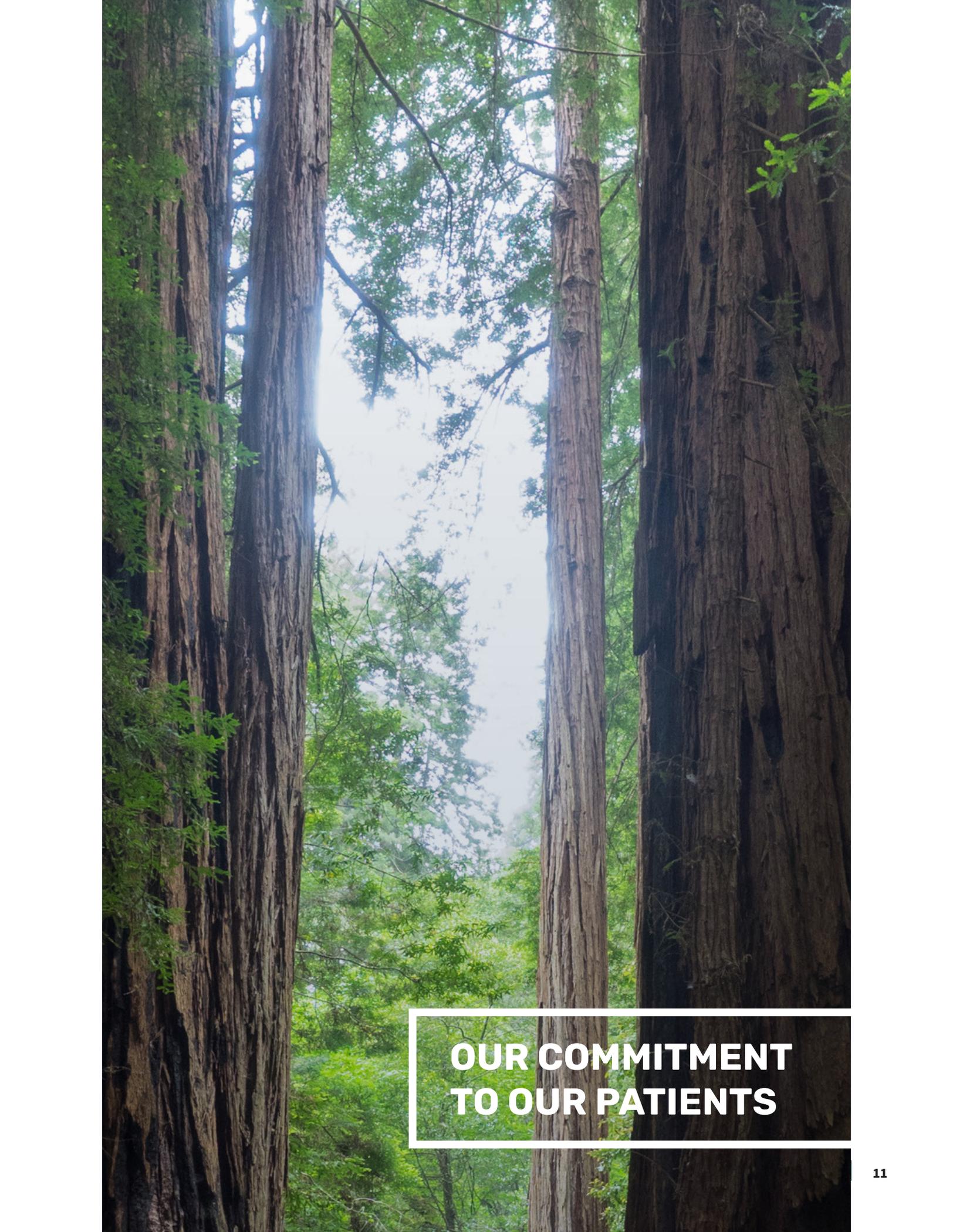
We are committed to fair competition among prospective suppliers and the sense of responsibility required of a good customer. We encourage our suppliers to adopt their own set of ethical principles.

To our volunteers:

We are committed to ensuring that our volunteers feel a sense of meaning from their work and receive recognition for their volunteer efforts. Volunteers assisting our patients and their families are an integral part of the fabric of healthcare. Our volunteers are an important part of the Kaweah Health team.

To our Foundation donors:

We are committed to ensuring that donations made to Kaweah Health are managed respectfully and responsibly to serve the needs of Kaweah Health and the patients and communities we serve.



**OUR COMMITMENT
TO OUR PATIENTS**

Our Commitment To Our Patients

Patient Care and Rights

In the availability of services; the admission, transfer or discharge of patients; or in the care we provide, we make no inappropriate distinctions based on age, gender, disability, race, color, religion, sexual orientation, gender identity, medical condition, educational background, economic status, the source of payment for care or national origin.

Upon admission, we provide each patient with a written statement of Patient Rights and a Notice of Privacy Practices. These statements include the rights of the patient to make decisions regarding medical care and regarding his or her health information maintained by Kaweah Health. Such statements conform to all applicable state and federal laws, including but not limited to the Health Insurance Portability and Accountability Act of 1996 (hereinafter referred to as HIPAA).

We seek to involve patients in all aspects of their care, including giving consent for treatment and making other healthcare decisions, which may include managing pain effectively, foregoing or withdrawing treatments, and, as appropriate, end of life care. In the promotion and protection of patients' rights, each patient and his or her representatives are afforded appropriate confidentiality, privacy, security and protective services, opportunity for resolution of complaints, and pastoral or spiritual care.

Patients shall be treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights, and involvement in their own care. Kaweah Health facilities maintain processes to support patient rights in a collaborative manner which involves Kaweah Health leaders and others. These processes are based on policies and procedures, which address both patient care and organizational ethics. These processes include informing each patient, or when appropriate, the patient's representative of the patient's rights in advance of furnishing or discontinuing care. Patients, and when appropriate, their families or caregivers are informed about the outcomes of care, including unanticipated outcomes. Additionally, patients are involved as clinically appropriate in resolving dilemmas about care decisions.

Kaweah Health maintains processes for prompt resolution of patient grievances which include informing patients of the grievance process which includes notification of the

resolution. Patients and/or their families have a right to file a complaint or grievance regarding their care and may do so by contacting Kaweah Health's Risk Management Department, the Joint Commission, or California Department of Public Health.

Kaweah Health maintains an ongoing, proactive patient safety effort for the identification of risk to patient safety and the prevention, reporting and reduction of healthcare errors.

Kaweah Health has established patient safety and quality of care policies. It is the responsibility of each staff member to follow our standards and policies. It is important to report non-compliance, safety or quality concerns to management so the issues can be addressed. Kaweah Health is committed to investigating and responding to all reported concerns. An employee may also report safety or quality of care concerns to the Joint Commission (TJC) by accessing their website at www.jointcommission.org. Additionally, TJC can be contacted online at https://www.jointcommission.org/report_a_complaint.aspx or by fax at (630) 792-5636. Kaweah Health will take no disciplinary action against any employee because they report a safety or quality of care concern.

Interpretive Services

Fluency in English is required for all employees having patient contact. To facilitate communication with non-English speaking or hearing-impaired individuals, Kaweah Health has alternatives in place including a 24-hour Language Line of more than 100 languages. Employees may access the line directly. A procedure is in place explaining how to use the Language Line. Employees may also contact management or the Interpreter Services department for assistance.

Interpreting services are available for both verbal and sign languages. Contact the nursing staffing office for details or to obtain an interpreter. Kaweah Health employees who are able to communicate in a second language are encouraged to contact the Interpreter Services Department for information on the voluntary interpreter program.

Patient Information

We collect information about the patient's medical condition, history, medication, and family illnesses. We realize the sensitive nature of this information and are committed to maintaining its confidentiality.

Kaweah Health employees must never access, use or disclose confidential information in a manner that violates the privacy rights of our patients. In accordance with our appropriate access and privacy policies and procedures, which are consistent with state and federal privacy requirements, no Kaweah Health employee, affiliated physician or other healthcare partner has a right to any patient information other than what is necessary to perform his or her job duties.

Subject only to emergency exceptions, patients can expect their privacy will be protected. Patient-specific information will be released only to persons authorized by the patient to receive the information or those authorized by law to receive the information.

Abuse and/or Neglect Reporting

Kaweah Health is committed to promoting a healthcare environment free from threats, harassment, abuse (verbal, physical, mental, or sexual), neglect, corporal punishment, involuntary seclusion and misappropriation of property.

Following State and Federal laws and Kaweah Health policy, all employees are mandated reporters of suspected child or elder/dependent adult abuse and domestic violence injuries. Patient and Family Services staff are available to help assess patients and make appropriate telephone and written reports. Please call (559) 624-2257 for assistance. See [Suspected child and or elder dependent adult abuse reporting/AP66 policy](#) for additional information.



**LEGAL AND REGULATORY
COMPLIANCE**

Legal And Regulatory Compliance

Legal and Regulatory Compliance

Kaweah Health provides a variety of healthcare services in the local area. These services are provided pursuant to appropriate federal, state, local laws and regulations and the Conditions of Participation for Federal Healthcare programs.

We have developed policies and procedures to address many legal and regulatory requirements. However, it is impractical to develop policies and procedures that encompass the full body of applicable law and regulation. Clearly, these laws and regulations not covered in organization policies and procedures must be followed. There are sources of expertise within the organization concerning these matters and these resources should be utilized for advice concerning human resources, legal, regulatory, and the Conditions of Participation requirements.

Witnessing Legal Documents

Employees must not act as a witness to a last will and testament, a promissory note, or other legal document not prepared by Kaweah Health, for a patient, a patient's family member, or another staff member.

Coding and Billing for Services

We have implemented policies, procedures and systems to facilitate accurate billing to government payers, commercial insurance payers and patients. These policies, procedures, and systems conform to pertinent federal and state laws and regulations. Kaweah Health prohibits its employees and agents from knowingly presenting or causing to be presented claims for payment or approval which are false or otherwise fraudulent.

In support of accurate billing, medical records must provide reliable documentation of the services rendered. It is important that all individuals who contribute to medical records provide complete and accurate information and do not destroy any information considered part of the official medical record.

Accurate and timely documentation also depends on the diligence and attention of physicians who treat patients in our facilities. We expect those physicians to provide us with complete and accurate documentation in a timely manner.

Any subcontractors engaged to perform billing, coding or collection services are expected to have the necessary skills, systems and appropriate quality control procedures to ensure all billings are accurate and complete. Kaweah Health requires the business associates to have their own ethics and compliance programs and a Code of Conduct or to adopt Kaweah Health's Code of Conduct as their own.

For coding questions, you can contact Health Information Management Services at (559) 624-2218. For billing questions, contact Patient Financial Services at (559) 624-4200. To report any suspected billing or coding misconduct, contact the Compliance and Privacy Officer at (559) 624-5006 or the Confidential Reporting Line at 1-800-998-8050.

False Claims Act and the Deficit Reduction Act of 2005

Both the Federal False Claims Act and the California State False Claims Act (FCA) protect the government from fraud involving any state or federally funded contract or program, including the Medicare and Medicaid (Medi-Cal) programs. Both acts establish liability for any person who knowingly presents or causes to be presented a false or fraudulent claim to the State or Federal government for payment. Any provider who violates the Federal and/or California FCA is liable to the state for three (3) times the amount of damages, Civil Monetary Penalties for each claim submitted, and possible exclusion from participation in federal and state healthcare programs.

Employee Protection – Qui Tam “Whistleblower” Provision

To encourage individuals to come forward and report misconduct involving false claims, both the Federal False Claims Act and the California False Claims Act include “qui tam” or whistleblower provisions. The “qui tam” or whistleblower provision allows a person who is the “original source” of knowledge of a past or present fraud to file a

qui tam action. The party bringing the action is known as the “relator.” “Original source” is defined as direct and independent knowledge of the information on which the allegations are based by one who has voluntarily provided the information to the Government before filing a lawsuit on behalf of the U.S. Government or State of California. The purpose of a qui tam suit is to recover the funds received as a result of the false claims to the U.S. Government or State of California. If the suit is successful, the relator may receive a percentage of the funds recovered.

In addition to a possible financial award, the False Claims Act entitles whistleblowers to additional relief, including employment reinstatement, back pay, and any other compensation arising from retaliatory conduct against a whistleblower for filing an action under the False Claims Act or committing other lawful acts, such as investigating a false claim or providing testimony for, or assistance in, a False Claims Act action.

Cost Reports

We are required by federal and state laws and regulations to submit certain reports of our operating costs and statistics. We comply with federal and state laws, regulations, and guidelines relating to all cost reports. These laws, regulations, and guidelines define what costs are allowed and outline the appropriate methodologies to claim reimbursement for the cost of services provided to program beneficiaries.

Kaweah Health policies address cost report compliance and articulate our commitment to ensuring accurate development and submission. Finance Department personnel are educated regarding federal and state laws, regulations and guidelines, and corporate policies; maintain a standardized work paper package to provide consistency in the preparation, organization, presentation, and review of cost reports; apply a uniform cost report review process; identify and exclude non-allowable costs; adhere to documentation standards; and use transmittal letters to report protested items and report other appropriate disclosures. All issues related to the preparation, submission and settlement of cost reports must be performed by or coordinated with our Finance Department.

Financial Reporting and Records

We have established and maintain a high standard of complete accuracy in documenting, maintaining, and reporting financial information. This information serves as a basis for managing our business and is important in meeting our obligations to patients, employees, suppliers, and others. The financial records are also necessary for compliance with tax and financial reporting requirements.

All financial information must reflect actual transactions and conform to generally accepted accounting principles. All funds or assets must be properly recorded in the books and records of the organization. Kaweah Health maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with management’s authorization and are recorded in a proper manner so as to maintain accountability of the organization’s assets.

We diligently seek to comply with all applicable auditing, accounting and financial disclosure laws. Finance management receives training and guidance regarding auditing, accounting and financial disclosures relevant to their job responsibilities. They are also provided the opportunity to discuss issues of concern with the Board of Directors’ Audit and Compliance Committee. Anyone having concerns regarding accounting or auditing matters should report such matters to the Director of Internal Audit, the Compliance and Privacy Officer or the Confidential Reporting Line.

Emergency Treatment-EMTALA

We adhere to the Emergency Medical Treatment and Active Labor Act (“EMTALA”) and Kaweah Health policy in providing an emergency medical screening examination and necessary stabilization to all patients, regardless of ability to pay. Provided we have the capacity and capability, anyone who presents in the Emergency Department with an emergency medical condition or who is in labor is treated. In an emergency situation or if the patient is in labor, we will not delay the medical screening and necessary stabilizing treatment in order to seek financial and demographic information. We do not admit, discharge, or transfer

patients with emergency medical conditions simply based on their ability or inability to pay or any other inappropriate discriminatory factor.

Patients with emergency medical conditions are only transferred to another facility at the patient's request or if the patient's medical needs cannot be met at Kaweah Health Medical Center (e.g., we do not have the capacity or capability) once the patient has been stabilized, appropriate care is knowingly available at another facility and the receiving hospital has accepted the transfer. Patients are only transferred in strict compliance with state and federal EMTALA regulatory and statutory requirements.

Response to Government Inquiries

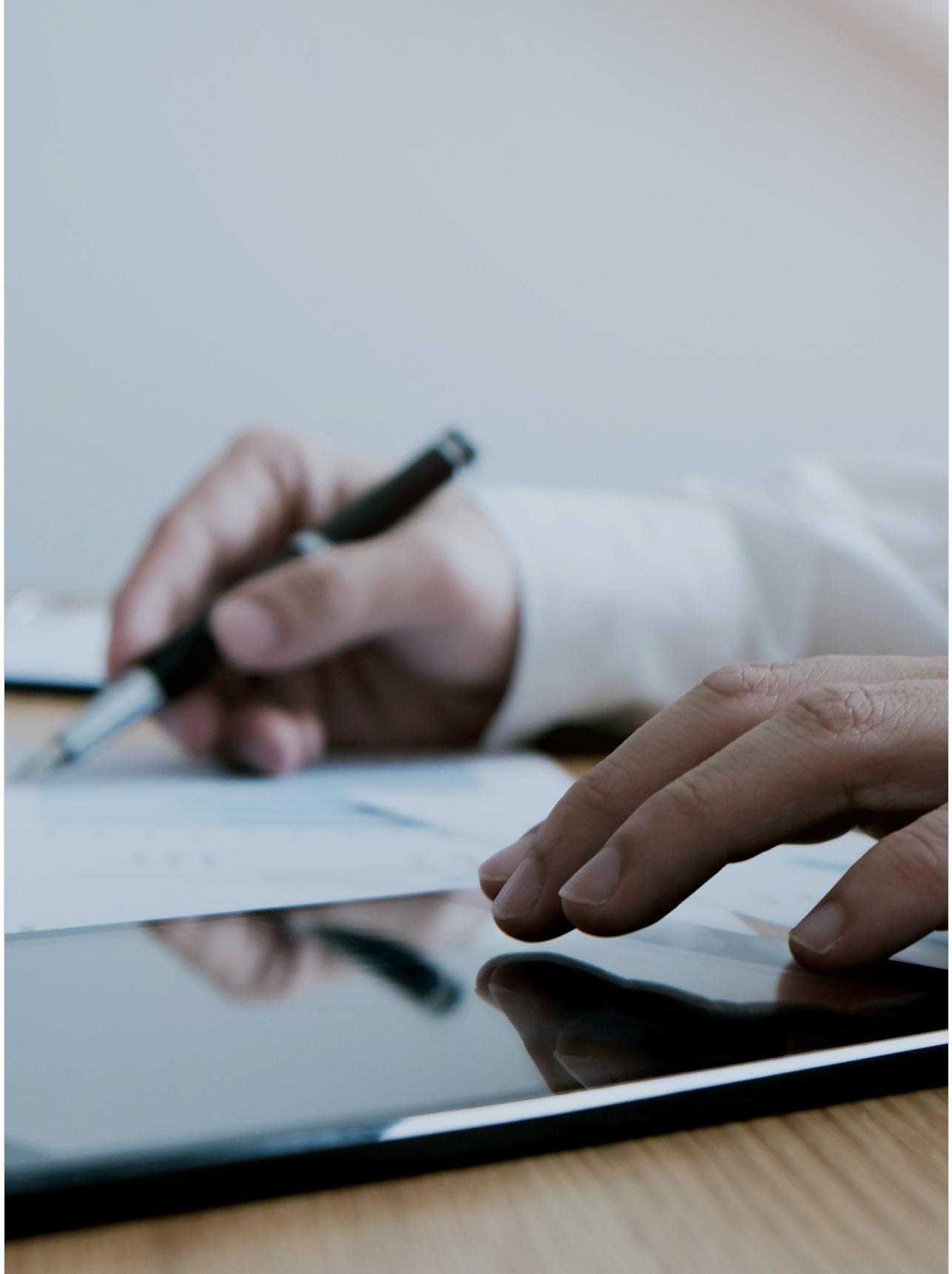
Various agencies may contact individuals associated with Kaweah Health to initiate a compliance-related inquiry. We will comply with lawful and reasonable requests or demands and we will provide truthful responses to government inquiries. At the same time, it is imperative that we protect the rights of Kaweah Health and its employees. Both Kaweah Health and its employees have the right to be represented by legal counsel during any compliance-related governmental inquiry. Kaweah Health employees have the right to have an attorney present during questioning by outside government agencies, whether that questioning occurs at work or away from work. Any individual who receives an inquiry, visit, subpoena or other legal document from a government agency, at work or at home regarding Kaweah Health business shall immediately notify his or her supervisor, the Compliance and Privacy Officer and/or the Director of Risk Management.

Your supervisor, Director of Risk Management and/or the Compliance and Privacy Officer will assist in verifying the credentials of the investigator and determining the legitimacy of the inquiry, and will follow proper procedures for cooperating with the request.

In some cases, government investigators, or persons presenting themselves as such, may contact employees outside of the workplace, during non-work hours, or at the employee's home. Do not feel pressured to talk with the person under such circumstances without first contacting the Compliance and Privacy Officer, the Director of Risk Management or the Compliance Advocate.

Accreditation and Federal/State Agencies

In preparation for, during and after surveys, Kaweah Health employees respond to all consultants and representatives of accrediting bodies in a direct, open and honest manner. No action should ever be taken when interacting with representatives of accrediting bodies that would mislead any member of a survey team.



**COMPLIANCE ADVOCACY
& PARTNERSHIPS**

Compliance Advocacy & Partnerships

Risk Management

The Risk Management Department oversees the risk prevention and claims process. Each employee is considered an important component of Kaweah Health's risk prevention program. Every employee plays a key role in risk prevention by functioning within the scope of their job description and following Kaweah Health's policies, procedures and guidelines. Staff must alert their supervisors to unsafe situations. If something does not feel right or you suspect an undesired patient outcome, notify your immediate supervisor and complete an occurrence report. Any employee who has a concern about the safety or quality of care provided in Kaweah Health may report their concerns to Risk Management, Compliance or the Confidential Reporting Line.

Audit and Consulting Services

The Audit and Consulting Services Department (ACS) serves as an independent and objective auditing and consulting service for Kaweah Health, reporting to the Board of Directors and the Chief Executive Officer. The Internal Audit function within ACS seeks to gain an in-depth understanding of the business culture, systems, and processes in place at the organization and to provide assurance to the Board and Management that internal controls are in place, that they adequately mitigate risks and that they help Kaweah Health meet its organizational goals and objectives. While the Department assesses the internal controls throughout the organization, each Kaweah Health employee is a part of and is responsible for maintaining a proper control structure. This involves performing their roles as outlined in their job description, following all laws and regulations and adhering to Kaweah Health policies. Any employee that has a concern related to internal controls at Kaweah Health, adherence to Kaweah Health policies and procedures, or adherence to laws and regulations should notify their supervisor immediately. Concerns may also be reported to Internal Audit, Compliance, Risk Management or the Confidential Reporting Line. The Consulting Services function within ACS provides internal consulting support to the Organization. This includes Project Management, Data Analysis, Performance Improvement, and other services. The scope of the engagements varies and is determined

in conjunction with Management requesting the service. Reporting for consulting projects is not typically at the Board level unless internal control, compliance or other significant issues are identified during the course of the project.

Quality and Patient Safety

Kaweah Health works to continuously improve its clinical and organizational functions. Each quality improvement activity is carried out in various formal and informal settings. Continuous quality improvement is achieved through the effective implementation and coordination of three distinct but overlapping processes:

- The systematic measurement and evaluation of outcomes, processes and services, especially as they relate to Kaweah Health's strategic plan defined annually.
- The analysis of these observations and measures.
- The design and implementation of quality improvement projects when desired or necessary.



BUSINESS RECORDS AND INFORMATION SYSTEMS

Business Records And Information Systems

Accuracy, Retention, and Disposal of Documents and Records

Each Kaweah Health employee is responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements but also to ensure records are available to support our business practices and actions. No one may alter or falsify information on any record or document. Records must never be destroyed in an effort to deny governmental authorities that which may be relevant to a government investigation.

Medical and business documents and records are retained in accordance with the law and our record retention policy. It is important to retain and destroy records only according to our policy. Kaweah Health employees must not tamper with records.

Electronic Media

All communications systems, including but not limited to electronic mail, Intranet, Internet access, telephones, and voice mail, are the property of Kaweah Health and are to be used primarily for business purposes in accordance with electronic communications policies and standards.

Users of computer and telephonic systems should presume no expectation of privacy in anything they create, store, send, or receive on the computer and telephonic systems. Kaweah Health reserves the right to monitor and/or access electronic media usage and content consistent with policies and procedures.

Employees may not use internal communication channels or access the Internet at work to post, store, transmit, download, or distribute any threatening materials; knowingly, recklessly, or maliciously false materials; obscene materials; or anything constituting or encouraging a criminal offense, giving rise to civil liability, or otherwise violating any laws.

Employee Privacy

Kaweah Health collects and maintains personal information that relates to your employment, including medical and benefit information. Access to personal information is restricted solely to people with a need to know this information. Personal information is released outside Kaweah Health or to its agents only with employee approval, except in response to appropriate investigatory or legal requirements, or in accordance with other applicable law. Employees who are responsible for maintaining personal information and those who are providing access to such information must ensure that the information is not disclosed in violation of Kaweah Health's policies and procedures.

Information Security and Confidentiality of Information

Confidential information about our organization's strategies and operations is a valuable asset. Although Kaweah Health employees may use confidential information to perform their jobs, it must not be shared with others unless the individual(s) and/or entities have a legitimate need to know the information in order to perform their specific job duties or carry out a contractual business relationship. In addition, these individuals and/or entities must have agreed to maintain the confidentiality of the information.

We exercise due care and diligence in maintaining the confidentiality, availability and integrity of information. Because so much of our clinical and business information is generated and contained within our computer systems, it is essential that each Kaweah Health employee protect our computer systems and the information contained in them by not sharing passwords and by reviewing and adhering to our information security policies and guidance.

It is Kaweah Health's policy to observe copyrights, trademarks, and/or licenses and safeguard the intellectual property of Kaweah Health and those with whom we do business.



WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES

Workplace Conduct And Employment Practices

Diversity and Equal Employment Opportunity

It is the responsibility of Kaweah Health to create and maintain an equal opportunity work environment in which employees are treated with respect, diversity is valued, and opportunities are provided for development. Harassment or abuse is prohibited in the workplace.

Kaweah Health also prohibits discrimination in any work-related decision on the basis of race, creed, sexual orientation, gender identity, age, disability status, national origin, or any other illegal basis. We make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities.

We comply with all laws, regulations, and policies related to non-discrimination in all of our personnel actions. Such actions include hiring, staff reductions, transfers, terminations, evaluations, recruiting, compensation, corrective action, discipline, and promotions.

If a Kaweah Health employee perceives that inequitable or unfair conduct is occurring in the workplace, the employee should contact the Human Resources Department. If the employee feels the matter was not resolved to his/her satisfaction, the employee may contact the Compliance and Privacy Officer or the Compliance Advocate or call the Confidential Reporting Line. See [Equal Employment Opportunity/HR.12 policy](#) for additional information.

Conflicts of Interest

A conflict of interest may occur if a Kaweah Health employee's outside activities, personal financial interests, or other personal interests influence or appear to influence his or her ability to make objective decisions in the course of the employee's job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract an employee from the performance of his or her job or cause the individual to use Kaweah Health resources for other than Kaweah Health purposes. Situations of actual or potential conflict of interest are to be avoided by all employees, including personal, financial, or romantic involvement with a competitor, supplier, patient

or employee of Kaweah Health which impairs the ability to exercise good judgment on behalf of Kaweah Health or creates an actual or potential conflict of interest. A good rule of thumb is that a conflict of interest may exist any time an objective observer of your actions might wonder if your actions are significantly influenced by your personal or financial activities or interests.

Kaweah Health employees are obligated to ensure they remain free of conflicts of interest in the performance of their responsibilities. If employees have any question about whether an outside activity or personal interest might constitute a conflict of interest, they must obtain the approval of their supervisor before pursuing the activity, or obtaining or retaining the interest. See [Vendor Relationships and Conflict of Interest/AP.40 policy](#) for additional information.

Gifts

Kaweah Health employees are prohibited from soliciting or receiving gifts, loans, entertainment or any other consideration of value from any individual or organization that does business or may wish to do business with Kaweah Health. If an employee receives any gift or favor, it must be returned, and the employee's supervisor must be notified. A Kaweah Health employee must not accept a personal gift of any consideration of value or any cash payment from a patient. In accordance with Kaweah Health policy, patients wishing to express appreciation to employees may do so in the form of flowers or candy addressed to and for the enjoyment of the entire department or by donating to the Foundation Guardian Angel recognition program in the employee's honor. For more information about the Guardian Angel Program, you can contact Kaweah Health Hospital Foundation at (559)624-2359. See [Vendor Relationships and Conflict of Interest/AP.40 policy](#) for additional information on gifts.

- **Referral Sources.** Any gifts or entertainment involving physicians or other persons in a position to refer patients are subject to federal laws, rules and regulations regarding these practices and must be undertaken with the utmost integrity and good judgment. Individuals uncertain about whether a particular event or function is appropriate should contact Human Resources or Compliance for direction.

Anti-Kickback and Stark Law

Federal and state laws and regulations govern the relationship between hospitals and physicians who may refer patients to the facilities. The applicable federal laws include the Anti-Kickback Law and the Stark Law. It is important that those employees who interact with physicians, particularly regarding making payments to physicians for services rendered, leasing space, recruiting physicians to the community, and arranging for physicians to serve in leadership positions in facilities, are aware of the requirements of the laws, regulations, and policies that address relationships between facilities and physicians.

If relationships with physicians are properly structured, but not diligently administered, failure to administer the arrangements as agreed may result in violations of the law. Any business arrangement with a physician must be structured to ensure compliance with legal requirements, our policies and procedures and with any operational guidance that has been issued. See [Physician Contracts and Relationships/CP.03 policy](#) for additional information.

Keeping in mind that it is essential to be familiar with the laws, regulations, and policies, there are two overarching principles that govern our interactions with physicians:

- **We do not pay for referrals.** We accept patient referrals and admissions based solely on the patient's medical needs and our ability to render the needed services. We do not pay or offer to pay anyone - employees, physicians, or other persons or entities - for referral of patients.
- **We do not accept payments for referrals we make.** No Kaweah Health employee or any other person acting on behalf of the organization is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. Similarly, when making patient referrals to another healthcare provider, we do not take into account the volume or value of referrals that the provider has made (or may make) to us.

Relationships with Subcontractors and Suppliers

We must manage our subcontractor and supplier relationships in a fair and reasonable manner, free from conflicts of interest and consistent with all applicable laws and good business practices. We promote competitive purchasing to the maximum extent practicable. Our selection of subcontractors, suppliers, and vendors will be made on the basis of objective criteria including quality, technical excellence, price, delivery, adherence to schedules, service, and maintenance of adequate sources of supplies. Our purchasing decisions will be made on the supplier's ability to meet our needs, and not on personal relationships and friendships. We employ the highest ethical standards in business practices in source selection, negotiation, determination of contract awards, and the administration of all purchasing activities.

Research, Investigations and Clinical Trials

Participation in Human Subjects Research is governed by federal and state laws. Federal law requires all research involving human subjects to have prior approval from an Institutional Review Board, and the approval includes additional examination of the proposed research from both ethical and privacy protection perspectives. Kaweah Health's Institutional Review Board (IRB) is made up of several scientists, non-scientists and public members.

All persons invited to participate in a clinical investigation or human subjects research study are provided a full explanation of potential risks, expected benefits and alternatives. Additionally, no persons are ever required to participate in research, and may withdraw from a study at any time, and for any reason.

Sanctioned/Excluded Individuals and Entities

We do not contract with, employ, or bill for services rendered by an individual or entity that is excluded or ineligible to participate in Federal healthcare programs; suspended or debarred from Federal government contracts; or has been convicted of a criminal offense related to the provision of healthcare items or services and has not been reinstated in a Federal healthcare program after a period of exclusion, suspension, debarment, or ineligibility, provided that we are aware of such criminal offense. Pursuant to Kaweah Health's policy, we routinely search the Department of Health and Human Services' Office of Inspector General and General Services Administration's lists of such excluded and ineligible persons. Kaweah Health's policy addresses the procedures for timely and thorough review of such lists and appropriate enforcement actions.

Employees, vendors, and privileged practitioners at Kaweah Health facilities are required to report to us if they become excluded, debarred or ineligible to participate in Federal healthcare programs; or have been convicted of a criminal offense related to the provision of healthcare items or services. See [Excluded Individuals/Entities/CP.07 policy](#) for additional information.

Identification Badge Policy

All Kaweah Health employees, contracted non-employees, physicians, care providers, vendors and volunteers are required to wear an identification badge at all times while performing their work on Kaweah Health premises. Students, vendor and service representatives, temporary help, contractors and construction workers, and volunteers will wear identification badges as a condition of being on Kaweah Health property. Additionally, all employees should wear a badge attachment, which contains important safety information. Badges must be worn chest high or above, with the name and picture clearly visible to patients, visitors, co-workers, physicians, and volunteers. If an employee damages or loses their badge, a replacement must be purchased through the Human Resources Department. See [Identification Badges/HR.183 policy](#) for additional information.

Kaweah Health Property and Assets

Kaweah Health property is made available to Kaweah Health employees only for authorized business purposes and shall not be used for personal reasons. This applies to physical assets such as office equipment, computers, software, medical supplies, as well as other types of property such as company records, patient information and customer lists. Kaweah Health property must not be removed from the premises unless it is necessary to do so to perform your job. If property is removed from the premises, you must maintain it in your possession at all times and return the property as soon as it is no longer needed. See [Security of Purchased Equipment and or Supplies/AP42 policy](#) for additional information.

All Kaweah Health employees are expected to maintain and properly care for Kaweah Health property. We all have an obligation to treat Kaweah Health property and equipment with care and respect. This includes reporting any damage or malfunction of Kaweah Health property to appropriate personnel. If you are aware of anyone intentionally or negligently damaging Kaweah Health property or equipment, report your observations to your supervisor or other manager who will investigate the matter and take appropriate action. See [Safe Medical Device Act/ Medical Device Tracking and Reporting/EOC 6009 policy](#) for additional information.

Client lists are a valuable asset and should never be disclosed to anyone outside Kaweah Health without specific management approval. Ask your supervisor about any request you receive for such a client listing.

Controlled Substances

Some of our employees routinely have access to prescription drugs, controlled substances, and other medical supplies. Many of these substances are governed and monitored by specific regulatory organizations and must be administered by physician order only. Prescription and controlled medications and supplies must be handled properly and only by authorized individuals. If you become aware of inadequate security of drugs or controlled substances or the diversion of drugs from the organization,

the incident must be reported immediately. See [Reporting Requirements for Drug Diversion Illegal Substance Abuse or Controlled Substance Abuse/AP110 policy](#) for additional information.

Harassment and Workplace Violence

Each Kaweah Health employee has the right to work in an environment free of harassment, abusive, threatening, intimidating and disruptive behavior. We do not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable in our workplace.

Sexual harassment is prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions. Moreover, verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment will not be tolerated at Kaweah Health.

Harassment also includes incidents of workplace violence. Workplace violence includes robbery and other commercial crimes, stalking, violence directed at the employer, terrorism, and hate crimes committed by current or former employees. Employees who observe or experience any form of harassment or violence should report the incident to their supervisor, the Human Resources Department, a member of Management, the Compliance and Privacy Officer or the Confidential Reporting Line. Retaliation for reporting is strictly prohibited by law and policy. See the [Anti-Harassment and Abusive Conduct/HR.13 policy](#) for additional information.

Health and Safety

Kaweah Health shall comply with all applicable workplace health, safety, and environmental laws and regulations. Kaweah Health employees handle hazardous chemicals, infectious agents, medical waste, and low-level radioactive material at various locations. All employees are expected to handle materials according to established control, storage and disposal procedures. If you do not know the correct procedure for handling or disposing of any material, promptly ask your supervisor or another Kaweah Health resource such as the Safety Officer at (559)624-2381 or Director of Risk Management at (559)624-2340 for assistance.

Most chemicals used in our facilities are not classified as hazardous waste. Information regarding the hazards, proper handling, and disposal of chemicals is contained within the Material Safety Data Sheets (MSDS) supplied to us by the manufacturer. The MSDS can be found on Kaweah Health's Intranet and in a binder available to departments where hazardous materials are used. If you are not sure, ask your supervisor or the Safety Officer before disposing of any chemical waste. Kaweah Health safety plans and manuals provide additional guidance.

Kaweah Health contracts with licensed disposal companies to remove and treat bio-hazardous waste to render it non-infectious. Bio-hazardous waste is placed in designated containers, either all red in color or having a fluorescent orange and black biohazard symbol.

Behaviors that Undermine a Culture of Safety

Intimidating and disruptive behaviors can cause medical errors, contribute to poor patient satisfaction, contribute to adverse outcomes, increase the cost of care, and cause qualified clinicians, administrators, and managers to seek new positions in more professional environments. Safety and quality of patient care is dependent on teamwork, communication, and a collaborative work environment. To assure quality and to promote a culture of safety, we endeavor to address behaviors that threaten the performance of the healthcare team.

Intimidating and disruptive behaviors include overt actions such as verbal outbursts, and physical threats, as well as passive activities such as refusing to perform assigned tasks or quietly exhibiting uncooperative attitudes during routine activities. Such behaviors include reluctance or refusal to answer questions, return phone calls or pages; condescending language or voice intonation; and impatience with questions. Overt and passive behaviors undermine team effectiveness and can compromise the safety of patients. All intimidating and disruptive behaviors are unprofessional and should not be tolerated.

License and Certification Renewals

Employees, individuals retained as independent contractors, and privileged practitioners in positions which require professional licenses, certifications, or other credentials are responsible for maintaining the current status of their credentials and shall comply at all times with federal and state requirements applicable to their respective disciplines. To assure compliance, Kaweah Health may require evidence of the individual having a current license or credential status.

Kaweah Health does not allow any employee, independent contractor or privileged practitioner to work in a position that requires a license or certification without valid, current licenses or credentials.

Substance Use and Mental Acuity

To protect the interests of our employees and patients, we are committed to an alcohol and drug-free work environment. All employees must report for work free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol; having an illegal drug in an employee's system; or using, possessing, or selling illegal drugs while on Kaweah Health work time or property may result in immediate termination. We may use drug testing as a means of enforcing this policy.

It is also recognized that individuals may be taking prescription or over-the-counter drugs, which could impair judgment or other skills required in job performance. Employees with questions about the effect of such medication on their performance or who observe an individual who appears to be impaired in the performance of his or her job must immediately follow appropriate protocol for reporting. The reporting protocol may vary by department or by site. It is up to the employee to familiarize themselves with their proper reporting chain of command.



**MARKETING, ADVERTISING
AND FUNDRAISING PRACTICES**

Marketing, Advertising And Fundraising Practices

Marketing and Advertising

Kaweah Health will advertise to inform the community of the availability and value of our services, to provide educational information about personal health, and to inform the public of Kaweah Health's views on public policy issues related to healthcare.

Kaweah Health is perceived as a reliable, authoritative source of information about medical care within the healthcare system. We shall remain mindful of the trust the public places in us to provide accurate, balanced information. Advertising will be honest and accurate and, when presenting views on issues, clearly distinguish opinion from factual data. Advertising shall not disparage or demean competitors, customers, or patients.

Antitrust - Compete Fairly

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. These laws could be violated by discussing Kaweah Health business with a competitor, such as how our prices are set, disclosing the terms of supplier relationships, allocating markets among competitors, or agreeing with a competitor to refuse to deal with a supplier. Our competitors are other health systems and facilities in markets where we operate.

At trade association meetings, employees must be alert to potential situations where it may not be appropriate to participate in discussions regarding prohibited subjects with competitors. Prohibited subjects include any aspect of pricing, our services in the market, key costs such as labor costs, and marketing plans. If a competitor raised a prohibited subject, employees must end the conversation immediately.

In general, employees should avoid discussing sensitive topics with competitors or suppliers. Employees also must not provide any information in response to an oral or written inquiry concerning an antitrust matter without first consulting their manager, responsible Executive Team member or the Compliance and Privacy Officer.

Kaweah Health Hospital Foundation

Kaweah Health Hospital Foundation is one of our oldest and strongest traditions. The members of the Foundation Board of Directors are volunteers from the community including Kaweah Health employees and doctors who believe in advancing local healthcare by being donors, fundraisers, and ambassadors for Kaweah Health. Since being established in 1980, the Foundation has raised monies to build new facilities, purchase medical technology, and advance patient care. The Foundation conducts fundraising activities throughout the year; it receives gifts from individuals, businesses, Kaweah Health employees and other foundations in the form of cash, securities and bequests.

Government Relations and Political Activities

Kaweah Health complies with all federal, state, and local laws governing participation in government relations and political activities. Additionally, Kaweah Health funds or resources may not be contributed directly to individual political campaigns, political parties, or other organizations which intend to use the funds primarily for political objectives. Organization resources include financial and non-financial donations such as using work time and telephones to solicit for a political cause or candidate or the loaning of Kaweah Health property for use in the political campaign. Kaweah Health engages in public policy debate only in a limited number of instances where it has special expertise that can inform the public about the public policy formulation process. When the organization is directly impacted by public policy decisions, it may provide relevant factual information about the impact of such decisions. In articulating positions, the organization only takes positions that it believes can be shown to be in the larger public interest. The organization encourages trade associations with which it is associated to do the same.

It is important to separate personal and corporate political activities in order to comply with the appropriate rules and regulations relating to lobbying or attempting to influence government officials.

No use of Kaweah Health resources, including e-mail, is appropriate for personally engaging in political activity. An employee may, of course, participate in the political process on his or her own time and at his or her own expense. While doing so, it is important that Kaweah Health employees not give the impression they are speaking on behalf of or representing Kaweah Health in these activities. Employees cannot seek to be reimbursed by Kaweah Health for any personal contributions for such purposes.

At times, Kaweah Health may ask employees to make personal contact with government officials or to write letters to present its position on specific issues. In addition, some members of Kaweah Health's Management Team may be required to interface on a regular basis with government officials.

Solicitation, Fundraising and Distribution of Material

In order to avoid disruption of healthcare operations or disturbance of patients, and to maintain appropriate order and discipline, solicitation and distribution of literature on Kaweah Health premises and among Kaweah Health staff and patients is prohibited.

Kaweah Health supports community organizations who engage in health-related charitable and fundraising activities/events that are consistent with or advance Kaweah Health's mission. Furthermore, Kaweah Health will consider support of certain health-related charitable activities/events that are held in the local communities. Formal approval is required by Kaweah Health policy for these types of charitable and fundraising activities. See [Solicitation, Fundraising and Distribution of Materials/ AP158 policy](#) for additional information.

Acknowledgment Process

Kaweah Health requires all employees to attest in an acknowledgment confirming they have received the Code of Conduct, understand it represents mandatory policies of Kaweah Health and agree to abide by it. New employees are required to sign an acknowledgment as a condition of

employment. Adherence to and support of Kaweah Health's Code of Conduct and participation in related activities training is considered in decisions regarding hiring and promotion.

Notes

Code of Conduct

Integrity, accountability,
and excellence

