

Code of Conduct

Compliance & Policy Committee Approval on: 08/10/2023
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Table of Contents

I. Introduction.....	3
II. Standards.....	4
Standard 1. CHPIV Culture, Workplace Environment and Brand.....	4
Standard 2. Compliance with the Law	5
Standard 3. Regulatory Entities and Government Inquiries.....	6
Standard 4. Business Relationships and Conflicts of Interest Avoidance.....	6
Standard 5. Public Entity Integrity	7
Standard 6. Record Keeping and Confidentiality.....	7
III. Addressing Noncompliance with the Code of Conduct.....	8
IV. Resources	8

I. Introduction

Local Health Authority for Imperial County (hereafter, "Community Health Plan of Imperial Valley" or "CHPIV") maintains this Code of Conduct as framework for operating in accordance with applicable regulations and laws, organization policies and procedures, and our guiding principles. CHPIV is committed to ensuring compliance with all pertinent federal and state requirements. The Code of Conduct serves as a resource to guide you in fulfilling your business responsibilities ethically. CHPIV developed this Code of Conduct based on the principles reflected in our Mission, Vision, and Values:

Mission The mission of the Community Health Plan of Imperial Valley is to work with community residents and stakeholders in both the public and private sectors to: (1) advance opportunities for improved health and access to comprehensive health care services; (2) promote the long-term viability of safety net providers; (3) increase prevention, education, and early intervention services; and (4) partner with Medi-Cal managed care plans to monitor and improve the local healthcare system.

Vision Healthy Community, Healthy Residents

Values INTEGRITY. Honestly, Trustworthiness, hardworking, accountability for our actions, and helpful to all. RESPECT. Treating people how you would like to be treated. RESPONSIBILITY: Own the service we provide. TEAMWORK: Supporting your colleagues and team members when they need you and vice versa, them being there when you need them. SERVANT MANAGEMENT. Serve the interests of all.

The Code of Conduct applies to the CHPIV Commission (governing board) and all applicable committees that report to the Commission, CHPIV employees, affiliates, officers, community advisory committees, management, temporary staff, volunteers, contractors, consultants, vendors, interns, and providers (hereinafter collectively referred to as "Applicable Individuals").

Applicable Individuals are not only encouraged but are obligated to act with integrity and honesty in every aspect of their work. This commitment goes beyond merely following rules; it's about fostering a culture of transparency and respect, ensuring we always act in the best interests of those we serve and represent. Applicable Individuals hold a shared responsibility in guaranteeing compliance and plays a crucial role in upholding our Code of Conduct. If at any point you believe that our standards may be compromised, it is not only your right but your responsibility to raise such concerns. Applicable Individuals are required to:

- Submit an annual acknowledgement confirming you have read and understand the Code of Conduct.

- Participate in any required Code of Conduct training.
- Understand and comply with regulations, applicable laws, and CHPIV policies.
- Disclose any potential or actual conflicts of interest.
- Report possible or confirmed Code of Conduct violation to your immediate supervisor, the Chief Compliance Officer, or via the Compliance Hotline at 800-919-4947.

II. Standards

Standard 1. CHPIV Culture, Workplace Environment and Brand

- **Member-centric:** CHPIV operates in service of its members with the mission to provide equitable, high-quality care in Imperial County. CHPIV places its members at the center of its decisions and operations.
- **Respect for Others:** CHPIV team members and Applicable Individuals must treat one another with respect and professionalism. Each team member is a valued and integral part of creating a healthy, successful workplace environment and of driving equitable, high-quality care for CHPIV members.
- **Nondiscrimination:** CHPIV does not tolerate discrimination based on race, color, religion, gender, national origin, ancestry, age, physical disability, mental disability, medical condition, family care leave status, veteran status, marital status, sexual orientation, or any other category protected under applicable laws.
- **Non-harassment:** CHPIV does not tolerate harassment, bullying, violence, or threats of violence of any kind.
- **The CHPIV Brand (branding & media requests):** Code of Ethics, Media Contact, the CEO will be the only contact to or from the Media. If anyone receives contact, or would like to provide information to the media, it must be through the CEO.
- **Use of CHPIV Systems:** CHPIV computers, networks, and mobile communication devices should be used for work purposes only. The following activities are prohibited. This list is not exhaustive and other activities will be addressed on a case-by-case basis.
 - Sharing login credentials
 - Distribution of inappropriate materials
 - Excessive use of email accounts for personal purposes
 - Excessive access to websites that are not work-related
 - Unsecure transmittal of sensitive information, PII, and PHI
 - Use of non-CHPIV e-mail services to send or receive PII, PHI, or other sensitive company information

- Removal of CHPIV data
- Disabling or bypassing security controls
- Installing software
- Attempts to access unauthorized systems, networks, or data
- Failure to report lost or stolen computers/communication devices
- **Non-Retaliation/Intimidation:** CHPIV has a zero-tolerance policy for intimidation and retaliation. CHPIV encourages and supports team members in reporting potential/confirmed violations of this Code of Conduct and potential/confirmed non-compliance with CHPIV policies or applicable law.

Standard 2. Compliance with the Law

- **Fraud, Waste, and Abuse:** CHPIV maintains a Fraud, Waste and Abuse Program which describes examples of potential fraud, waste, and abuse, CHPIV and subcontractor obligations, and potential sanctions/disciplinary action related to violations. CHPIV and Applicable Individuals are prohibited from engaging in conduct that violates Fraud, Waste, and Abuse laws. CHPIV requires its staff, Commission members, and subcontractors/FDRs to complete required training regarding Fraud, Waste, and Abuse. CHPIV is committed to the prevention, detection, and reporting of Fraud, Waste and Abuse. All individuals are responsible for reporting suspected Fraud, Waste, and Abuse to Compliance@chpiv.org.
- **Anti-Trust:** CHPIV and Applicable Individuals are required to comply with applicable anti-trust laws. Individuals who encounter business decisions with potential for anti-trust law implications are required to seek advice from legal counsel.
- **Political Activities:** CHPIV funds, property, and resources cannot be used for any political activity. CHPIV and applicable individuals may not imply that their personal political views represent CHPIV.
- **Protecting Confidential Member Information:** CHPIV safeguards all member confidential information, including but not limited to protected health information (PHI) and personally identifiable information (PII), in accordance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH Act), the California Security Breach Notification Law, the California Confidentiality of Medical Information Act (CCMIA), and other applicable laws. CHPIV maintains policies and procedures that govern how the organization and Applicable Individuals are to ensure member confidentiality rights.
- **Protecting Proprietary Information:** In accordance with the Public Records Act, CHPIV safeguards confidential proprietary information, including contractor information, provider identification numbers, Medi-Cal license

information, Medicare numbers, social security numbers, and other identifying information.

- **Use of Proprietary Information:** Applicable Individuals may not use proprietary CHPIV information for their own personal benefit, during and after employment with CHPIV.
- **Compliance Training:** CHPIV requires its employees, interns, volunteers, and Commission to complete Compliance Training within 90 days of hire and annually. Compliance training includes topics related to Fraud, Waste, and Abuse, HIPAA, CHPIV's Compliance Program, and obligations to report potentially non-compliant activities.

Standard 3. Regulatory Entities and Government Inquiries

- **Communicating with Regulators/Government Entities:** CHPIV is committed to maintaining open, accurate, and truthful communications with regulators and applicable government entities. Communications with regulators are managed and coordinated through the Compliance department in collaboration with CHPIV leadership. If a regulatory or government entity contacts you, please reach out to the Compliance department (Compliance@chpiv.org) for guidance on how to proceed.
- **Exclusion from Government Programs/Participation Status:** CHPIV does not hire or conduct business with any Applicable Individuals who are excluded from participation in any federal or state health care program. Applicable Individuals are required to disclose if they are or become ineligible, whether due to suspension, termination, debarring, or other reason for ineligibility. Similarly, such individuals must also disclose if they are at risk of becoming ineligible, under investigation, or facing potential or actual disciplinary action.

Standard 4. Business Relationships and Conflicts of Interest Avoidance

- **Gifts:** Applicable Individuals are not permitted to solicit or accept gifts, favors, services, entertainment, or other items of value from any entity that provides items or services which may be used by CHPIV. Attending business meetings at which meals are served is considered a permissible activity.
- **Business Inducements:** Applicable Individuals are prohibited from using their positions to personally profit or assist others in profiting in any way. This includes improper use of business courtesies, payments, and offering, giving, soliciting, or receiving any form of bribe or improper payment.
- **Conflict of Interest:** Conflicts of Interests, as well as the appearance of a Conflicts of Interest, must be avoided. Applicable Individuals must comply with applicable Conflict of Interest Laws, including California Government Code 1090 et seq., California Political Reform Act (Government Code Section 81000 et seq.) and common conflict of interest laws. Additionally, Applicable

Individual must avoid actions or relationships that can appear to influence the individual's ability to perform their duties objectively. Examples of conflicts of Interest include but are not limited to seek employment as a director, officer, or consultant with or hold financial interest in any competitor, vendor, or health care provider; personal gain through access to company information; accepting gifts or favors from an outside company that does business with CHPIV; etc. CHPIV requires any potential or actual conflicts of interest to be reported to the Chief Compliance Officer. Prior written approval of the CEO, or in the case of the CEO, the Chair of the Commission, must be provided should an employee seek to perform work for any organization with which CHPIV does business/seeks to do business, be a director, officer, or consultant of any contractor, or permit their name to be used such that it indicates a business connection with any contractor. CHPIV will take action to eliminate the Conflict of Interest, up to and including separation from employment.

Standard 5. Public Entity Integrity

- **Use of Public Funds:** CHPIV complies with applicable laws regarding investment of public funds and expenditure limits. Applicable Individuals are prohibited from using public funds or assets for gifts or lending of credit to private persons without adequate consideration unless such actions clearly serve a public purpose consistent with CHPIV's mission and authority. Such use of funds must also be approved by CHPIV's legal counsel.
- **Public Meetings:** CHPIV and its Commission must comply with the Ralph M. Brown Act, California Government Code Sections 5490 et seq with regard to public meetings.

Standard 6. Record Keeping and Confidentiality

- **Books and Records:** CHPIV, a public entity, is subject to the California Public Records Act, California Government Code Sections 6250 et seq. (CPRA). As such, CHPIV records or copies of records may be viewed by members of the public, unless the information is protected from disclosure under the CPRA. If you receive a CPRA-related request, please refer the requestor to Compliance@chpiv.org.
- All CHPIV records, documents, and data, whether hard copy or electronic, must be preserved in accordance with applicable regulations and CHPIV policies.
- CHPIV requires recordkeeping to be accurate and legal. Alteration or falsification of any CHPIV records is prohibited. This includes financial records. Improper record keeping should be reported immediately to the Chief Compliance Officer (Compliance@chpiv.org).

III. Addressing Noncompliance with the Code of Conduct

In the case of a violation of the Code of Conduct, the Applicable Individual is subject to disciplinary action including termination of employment/contract. Violations of the Code of Conduct include but are not limited to failure to follow CHPIV policies or applicable law; failure to disclose information or giving false information in connection with an investigation; neglecting to address and/or report a violation with the Code of Conduct, policy, or applicable law; or retaliation against an individual who reported a suspected violation.

Potential violations can be reported via the following methods:

Compliance Hotline	800-919-4947
Chief Compliance Officer	Elysse Tarabola, Chief Compliance Officer Email: ETarabola@chpiv.org Direct Line: (760) 232-5021
Compliance Department	Compliance@chpiv.org
Human Resources	Michelle Ortiz, Office & HR Manager Email: MOrtiz@chpiv.org Direct Line: 760-970-5072
Online Reporting Form	chpiv.org/compliance-program

IV. Resources

[CHPIV Policies & Procedures Repository](#)

If you need more information or have any questions regarding the information within this Code of Conduct, applicable law, or CHPIV policies, please contact your Compliance or Human Resources departments.