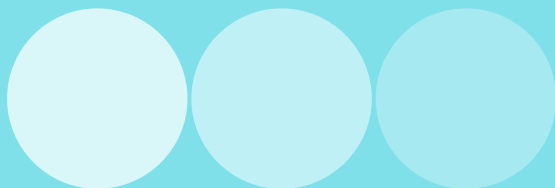


# Group Health Code of Conduct



November 2015

# A Message from Group Health Leadership

We operate in an uncertain and volatile health care environment in which a commitment to change is essential for our success. But as important as this is, there are some things at Group Health that have not—and will not—change. Our belief in patient-centered care that starts with prevention is one. Our commitment to the highest standards of integrity and ethical business conduct is another.

This commitment is rooted in our deeply held beliefs about how we, as an organization of skilled and compassionate women and men who value service to others, are driven to operate. But it is also a practical business matter. Our reputation is one of our most important assets. Over our long history, we have earned the confidence and trust of our patients, members, purchasers, and the wider community. We must be diligent in maintaining our reputation for excellence and integrity, and preserving that trust.

This is vital to our ability to care for our patients, to serve our members, to achieve long-term success as a health care organization, and to maintain our reputation in the communities we serve. Group Health relies on our shared commitment to maintaining the highest integrity in everything we do. Upholding this commitment means taking responsibility for our own ethical conduct and for preserving the integrity of our work and care environment. In this way, each of us helps Group Health deliver quality care and service in a way that makes all of us proud.

To this end, we have developed this Code of Conduct to provide an ethical roadmap to help each of us meet our responsibility to act with the highest level of integrity as we strive to make the best choices in our work on behalf of Group Health.

The Code of Conduct is available to regulators and the public, but its most important audience is within Group Health. Everyone who works on Group Health's behalf is expected to live up to these principles and apply them to any and all circumstances which may arise.

Trust has always been the foundation of our success, and it must be earned every day by every person who represents Group Health. This Code of Conduct is a guide for how we earn that trust. As part of the Group Health team, you are expected to read, understand, and embody the principles it describes. It and the values embedded within it are critical to every part of our work.

Please take the time to read our Code of Conduct and consider how you will embody this code in your daily work, and how you will respond appropriately when faced with a potential ethical challenge.

Susan Byington



Chair of the Cooperative

Scott Armstrong



President and  
Chief Executive Officer

Steve Tarnoff, MD



President and Chief Medical Executive,  
Group Health Physicians

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# Group Health's Commitment to Compliance

## An Overview of Compliance and Ethics at Group Health

### Compliance and Ethics Program

Group Health's Compliance and Ethics Program formalizes our commitment to conducting business with integrity and complying with all applicable standards, laws and regulations. It sets the ethical tone for work performed at Group Health and provides a framework for reporting and addressing instances of known or suspected violations of the Code of Conduct. The Code serves as an important foundation for Group Health's Compliance and Ethics Program.

### Office of Compliance and Ethics

The Office of Compliance and Ethics, led by the Chief Compliance and Ethics Officer, oversees the Compliance and Ethics Program. It serves as a resource for staff for ethics and compliance concerns and assists the organization in its goal of preventing problems initially, detecting existing problems, and resolving problems.



#### How am I expected to participate in the Compliance and Ethics Program?

Every element of Group Health's Compliance and Ethics Program is important in helping us keep our compliance commitments. However, no element is as important as your participation. You support the program in the following ways:

- Read and understand the Code of Conduct and the other policies and procedures that apply to your work.
- Remember that each of us is responsible for compliance and ethics at Group Health. To remind us of this commitment, we are all asked to acknowledge the Code of Conduct annually, as a condition of employment or other position in the organization.
- Ask questions if you don't understand what's expected of you, and report your concerns. Group Health relies on us to speak up so that potential problems can be prevented or corrected.

# Code of Conduct

## Introduction

All of us are representatives of Group Health and have a responsibility to conduct ourselves with integrity and comply with the Code of Conduct. We must make our best effort to abide by the laws and regulations that apply to Group Health and behave ethically toward our patients, our members, our colleagues, and those with whom we do business. We have a responsibility to consult with our direct supervisor, manager, chief or with the Office of Compliance and Ethics when questions or issues arise and to report suspected violations of the Code of Conduct. We also have a responsibility to familiarize ourselves with the applicable policies and procedures that govern in more detail how we uphold our commitments.

Acting with integrity helps to ensure that Group Health retains and rewards the trust placed in us by our patients, members, and purchasers. Doing the right thing – behaving ethically, being aware of and abiding by the many requirements placed on a complex health care organization like Group Health - may be complicated, but following these simple steps can help you make the best decision in any situation:

**T**hink before you act

**R**eflect on the Code of Conduct and relevant laws and policies

**U**se your best judgment

**S**eek clarification and share your concerns as needed

**T**ake responsibility



This approach is more fully developed in Group Health's Values-based Decision Making model.

## Values-based Decision Making

At Group Health, values-based decision making means that staff and others working on behalf of Group Health are expected and empowered to act consistent with Group Health's values, even in the face of pressure to act otherwise. The values-based decision making model is a set of questions for staff to ask themselves to help them make the right decisions in their everyday work activities as well as when they are making difficult choices on behalf of the organization.



### Ask Yourself:

- Is it consistent with Group Health's values?
- Is it consistent with Group Health's policies and standards?
- Would it preserve or enhance Group Health's reputation?
- Does it serve the best interests of Group Health and our customers?
- Can I be proud of this decision or action?
- Will my colleagues, managers, and company be pleased with my decision?



**If the answer to all of these questions is "yes":**  
The decision to move forward appears to be appropriate.



**If the answer to any of these questions is "no" or:**

- It could appear to be improper, or
- You are unsure,



**Seek further guidance before moving forward.**

Take one or more of the following steps until your concerns or questions are resolved:

1. Review the Code of Conduct and/or Group Health's policies and standards.
2. Talk to your manager or, if necessary, to a more senior manager.
3. Contact the Office of Compliance & Ethics at 206-448-2019 or [complianceoffice@ghc.org](mailto:complianceoffice@ghc.org).
4. Call the Compliance Hotline at 1-800-741-7817 or make a report [online](#).

## Speaking Up

To keep Group Health a safe and inviting place to work, we rely on staff to speak up and report:

- Potential non-compliance with the law, this Code of Conduct, and company policies; or
- Any situation or circumstance that seems unethical

In some cases, you may have information about what appears to be a clear violation of applicable policies, laws, or standards. Many times, however, you will be required to make a "judgment call" based on your professional experience.

You don't have to suspect there's a problem to speak up, though. It's also important to ask questions when you're confronted with a situation where the proper course of action is unclear.

Typically, the best place to raise an issue or ask a question is within your own department or business unit. In most cases, your manager is closest to the issue and may be the best place to start. If you are uncomfortable reporting a concern to your manager, you may choose to report to either:

- **The Office of Compliance and Ethics**
  - By phone at 206-448-5819 (CDS 320-5819) or
  - E-mail at [complianceoffice@ghc.org](mailto:complianceoffice@ghc.org).
- **The Group Health Compliance Hotline**
  - at 1-800-741-7817 or
  - [online](#).



The Compliance Hotline is operated by an outside contracted organization and reported information is held in the strictest confidence possible.



I'm not sure whether a situation I'm concerned about is a compliance issue or some other kind of issue. What should I do?

If you call or e-mail the Office of Compliance and Ethics, we can help you evaluate the situation. If it's not a compliance issue, we can direct you to the right resource or forward your concern appropriately.

I know of a situation that may violate Group Health's Code of Conduct. Should I report it even if I am not absolutely sure it's a problem?

Yes. You have a responsibility to communicate your concerns immediately. Your report will be investigated to determine whether or not there is an issue, so it's better to report a suspected violation than to allow a potential problem to continue. Reports can be made to your manager, the Office of Compliance and Ethics, or to the Compliance Hotline. Group Health does not tolerate any form of retaliation against a person for reporting an issue in good faith.

As a manager, what should I do if one of my staff reports a concern to me?

Managers should encourage staff to bring their concerns to them. Your manner should be open, objective and responsive, not skeptical or dismissive. Remember, raising concerns is a positive sign that your staff are committed to doing the right thing and that they trust you to handle the matter. Be sure to report any compliance, legal or workplace behavior issue to the Office of Compliance and Ethics, Legal or HR as appropriate.

There is a situation I'm concerned about, but I worry that I'll be retaliated against if I report it. What should I do?

Don't worry. Group Health welcomes your concerns and questions and does not tolerate retaliation against anyone who makes a report in good faith.



## Investigations

All reported issues of concern, no matter how they are communicated, are investigated fully by the [Office of Compliance and Ethics](#) in partnership with other Group Health departments as appropriate.

You may make a report anonymously, although it is helpful to know who is making a report in case additional information is needed to properly investigate it. Investigations are handled confidentially and, to the extent permitted by law, the identities of staff members with concerns who wish to remain anonymous are not disclosed.



I called the Compliance Hotline to report a concern I have. What happens now?

The Office of Compliance and Ethics (OCE) will review your report. Depending on the kind of concern you raise, the OCE may refer it to another part of the organization to address (such as Human Resources for employment-related matters, the Privacy Office for privacy issues and the Special Investigations Unit (SIU) for suspected fraud, waste and abuse), or conduct its own investigation. Once the report is investigated, recommendations about appropriate corrective actions may be made. The Office of Compliance will notify you when this is complete, although it's possible that details of the investigation or its outcome may not be shared with you due to confidentiality issues or other considerations.

What happens if there is a suspected violation of the Code of Conduct?

The Office of Compliance and Ethics (OCE) will review all suspected code or other violations that are reported. If it appears likely that a violation actually did occur, an investigation will be conducted. Depending on the kind of violation, the OCE may refer it to another part of the organization to address (such as [Human Resources](#) for employment-related issues or the [Privacy Office](#) for privacy issues), or conduct its own investigation. When the investigation is complete, recommendations about appropriate corrective actions may be made.

## Non-Retaliation

Group Health will not tolerate any form of retaliation against a person for reporting an issue in good faith or participating in an internal or governmental investigation. It is important to maintain an environment in which we can report any suspected Code of Conduct violations without fear of retaliation. Group Health's [non-retaliation policy](#) protects us from adverse personnel actions taken in retaliation for disclosing what we believe to be improper, unethical, unlawful, or dangerous activities or business practices within Group Health.



What is a "good faith" report?

A "good faith" report is one made by a person who reasonably believes the situation he or she reports is true, and that he or she believes violates the Code of Conduct, the law, or Group Health policy, or is unethical. Reports that are made frivolously or maliciously are not considered good faith.

## Disciplinary Action

Our compliance with this Code of Conduct is an expectation and a condition of employment at Group Health. Staff members and others working on behalf of Group Health who violate it or related policies and procedures or who knowingly fail to report violations may be subject to disciplinary action up to and including termination. Supervisors, managers and chiefs who fail to adequately oversee compliance by those they supervise may also be subject to disciplinary action.

# Our Commitment to Our Patients and Members

## Patient Care and Member Services

Group Health exists to enrich people's lives by improving health. We do this by:

- Providing our patients with high-quality and appropriate health care delivered in a compassionate manner.
- Designing and offering a variety of excellent health plans and services that are convenient, affordable and meet the needs of our members, customers and purchasers.

The health care we provide must meet established professional standards. All patient care and health plan activities must comply with applicable laws and regulations.

## Patient and Member Privacy

Group Health's patients and members have a right to confidentiality that is assured by state and federal laws, such as the Health Insurance Portability and Accountability Act (HIPAA) and Health Information Technology for Economic and Clinical Health Act (HITECH), and by Group Health policies. Actively safeguarding this right is a responsibility of every one of us. Patient and member information should be accessed only when it is needed to provide care or conduct Group Health business.

Sometimes it can be difficult to know when it is acceptable to access, use or share patient and member information. The [Privacy Office](#) is available to answer privacy and confidentiality questions, provide resources, and respond to concerns and complaints.

There are also laws that may require us to inform patients and members or the government of an activity that may be a violation of privacy policy. If you know of an activity that may be inappropriate, you must report it to the [Privacy Office](#). The Privacy Office can be reached at [privacy.office@ghc.org](mailto:privacy.office@ghc.org) or 206-448-2422 (CDS 320-2422).



## Honoring Patient and Member Diversity

It is Group Health's privilege to serve a diverse patient and member population. Our respect for diversity is fundamental to our ability to provide continuously improving, high-quality health care. We have a responsibility to honor and respect the beliefs, interpersonal styles, attitudes, and behaviors of the individuals, families and communities we serve. We strive to make Group Health welcoming to all members and patients by delivering care and services in a manner that recognizes this diversity and does not discriminate.

# Our Commitment to Each Other

## Treatment of Staff

Each of us has a responsibility to treat our fellow staff members with respect, dignity, and fairness at all times. This includes maintaining a professional work environment that is free of harassment and discrimination in all aspects of the employment relationship.



**My co-worker occasionally tells off-color jokes in the break room. A lot of people think he's funny, but he makes some of us uncomfortable. Is there anything I can do?**

Off-color jokes are not appropriate in the workplace. You should tell your co-worker that he is making you uncomfortable with his jokes and ask him to stop. If he continues, speak to your manager, your Human Resources consultant, or report the matter to the [Compliance Hotline](#).

## Workplace Safety

It is our intention that every person who enters a Group Health facility is kept safe. Group Health is committed to complying with laws and regulations affecting safety, health, and the environment and maintaining a drug- and alcohol-free workplace. To that end, Group Health has in place policies, procedures, systems, tools, equipment and training to ensure workplace safety. In addition, all facilities owned or managed by Group Health are gun-free zones. Each of us has a responsibility to help make sure that our facilities are safe environments for staff, patients and visitors. Health and environment hazards, unsafe conditions or security-related issues must be reported to [Security Services](#) immediately.

Group Health strives to ensure the safety of all staff, patients and visitors on Group Health property. However, when accidents or injuries occur, we are required to report them. Doing this is required by law, but it also helps Group Health improve its processes and practices to make our facilities even safer.

## Privacy for Group Health Staff, Friends and Family

Like our patients and members, Group Health staff members have a right to confidentiality by law and Group Health policy. You must never access or share the private information of your fellow staff members unless permitted by law and necessary for you to do your job. The private information of your family members and others with whom you have personal relationships is similarly protected. Even with their permission, you are not permitted to access this information without a business need. The [Privacy Office](#) is available to answer privacy and confidentiality questions, provide resources, and hear concerns and complaints.



**I have a coworker who is in the hospital and I'm really concerned about her. Can I use my access to Epic to find out how she's doing?**

Absolutely not. This would not only be contrary to Group Health policy, it would also be illegal. Group Health's confidentiality standards are the same for all patients; therefore, your coworker is entitled to the same patient privacy protections as any other patient. You are also not permitted to access your own patient information or that of family members. You may only access patient or member information if and when it is required for you to do your job.

## Honoring Workforce Diversity

Group Health has supported equal employment opportunity (EEO) throughout its history. Diversity and inclusion are critical elements of our long-term strategy to improve the health of our members and to maintain a healthy, vibrant work environment. We strive to make Group Health welcoming to all staff, so harassment of any kind in the workplace is prohibited. Staff members who feel they are being treated inappropriately or harassed should consult their direct supervisor, manager, chief, Human Resources consultant, or the [Compliance Hotline](#).

# Our Commitment to Group Health

## Conflict of Interest

A conflict of interest occurs when our personal activities or relationships influence or appear to influence our objectivity in serving Group Health's interests. We are committed to avoiding even the appearance of a conflict. Therefore, we are not permitted to participate in any transaction involving Group Health in which we or our relative(s) (as defined in the [conflict of interest policy](#)) have a personal interest. No guideline can address every type of conflict of interest, but some common examples include: personal or family enterprises that conduct business with Group Health or compete with it, outside activities conducted during work time, and the hiring or supervision of family members. Group Health's [conflict of interest policy](#) provides comprehensive guidance on this topic.

We are also committed to avoiding conflicts when conducting business with suppliers and customers. (Also see Working with Vendors below.) You are expected to exercise your best judgment and discretion in these matters and to consult with your manager, chief or the [Office of Compliance and Ethics](#) when you have questions about a potential conflict of interest.

Group Health Cooperative employees may serve as officers and directors of Group Health subsidiaries such as [Group Health Options \(GHO\)](#) and [Columbia Medical Associates \(CMA\)](#). This does not constitute a conflict of interest.

**Gifts:** Group Health staff members may not accept or encourage gifts of money or money equivalents (e.g., gift certificates) from customers, clients, or businesses dealing with Group Health under any circumstances, nor may staff members solicit non-monetary gifts, gratuities, or any other personal benefits or favors from suppliers or customers. Gifts to Group Health of nominal value from vendors at the holidays and other special occasions may be accepted, although frequent or lavish gifts should be declined. To avoid any appearance of a conflict of interest, special care should be taken to avoid accepting gifts from a vendor at critical points in the procurement process, such as just before or just after awarding a contract to a vendor. Staff acting on behalf of Group Health may not accept financial support or items of value from vendors, consultants or organizations doing business or seeking to do business with Group Health.

Gifts of appreciation from patients/members that are not of significant value may be accepted. However, gifts of cash or cash equivalents (such as gift certificates) are never acceptable, and neither are gifts which are expensive, frequent, solicited from a patient/member, or given by a patient/member in such a way that we have reason to believe the patient /member might expect a different level or type of care, coverage or service for having given it.

**Entertainment:** From time to time, staff members may offer entertainment to or accept entertainment from a vendor if it is not excessive and occurs only infrequently. Staff members may not offer or accept entertainment that is not a reasonable addition to a business relationship or is primarily intended to gain favor or influence.

**What's a "conflict of interest"?**

A conflict of interest occurs when our personal activities or relationships influence or appear to influence our objectivity in serving Group Health's interests.

Personal, business and financial relationships all have the potential to create a conflict of interest – or the appearance of one. Since the appearance of a conflict can be as serious as an actual conflict, it's important to look at the facts and circumstances of each potential conflict. Some situations are always a conflict - such as serving on the board of a competitor - while others may be potential conflicts - such as investing in or having a spouse or friend who works for a competitor or supplier. If you think you have a potential conflict of interest, discuss the situation with your manager or contact the [Office of Compliance and Ethics](#) for help.

**I have a relative who owns a company that provides services Group Health needs. May I recommend this company to Group Health?**

You may recommend your relative's company, but you must disclose your relationship when you do so. The overriding principle in these situations is that the best interests of Group Health must be served. Therefore, Group Health's normal procurement and request for proposal (RFP) policies and processes must be followed and you would not be able to participate in the development of the RFP or the procurement process. If you are a Group Health leader, the company would not be permitted to supply goods or services to any function or department within your chain of command at Group Health.

**My spouse works for an employee benefits company, and I am a sales account manager at Group Health. Is this a conflict of interest?**

It sounds like it could be, but it may be able to be managed. You should report the relationship to your manager and to the [Office of Compliance and Ethics](#). To manage the conflict, you should not be involved in matters related to your spouse's company and you should never discuss or share Group Health's confidential information with your spouse.

**I am a registered nurse. I have a job offer to work part-time for an area hospital that is contracted with Group Health. Can I accept the job?**

This situation has the potential to create a conflict of interest. Report the job offer to your manager and to the [Office of Compliance and Ethics](#). If it's determined that it's OK for you to accept the part-time job, there may need to be agreements in place about the outside work not interfering with your Group Health job and what to do should you encounter Group Health patients in your job at the contracted hospital.

**The niece of our department manager was hired as a receptionist, and other department staff feel she's being favored. If the niece does not report directly to the manager, is this a problem?**

Yes, this situation is a conflict of interest due to nepotism, and [Group Health policy](#) prohibits it. If the niece works within the chain of command of the manager, she shouldn't have been hired into that position in the department. The reporting structure should be adjusted so that she doesn't report up the chain to the department manager.

**I just learned that my spouse, an independent consultant who often contracts with large firms, has landed a contract to perform some work for Group Health. Is there anything I need to do?**

If you did not participate in the selection or hiring of your spouse at Group Health, and your spouse will not be working within your chain of command, this situation is unlikely to be an actual conflict. However, to avoid the appearance of a conflict of interest, you should disclose it to your manager and the [Office of Compliance and Ethics](#).

**I think my manager has an interest in a business that contracts with Group Health, but I'm not certain. I don't want to report it in case I am wrong. What should I do?**

If you suspect a problem, you should go ahead and report it to the [Office of Compliance and Ethics](#) or to the [Compliance Hotline](#). It's better to look into the matter and discover that everything is OK than to let a potential conflict continue. You may make the report anonymously, although it can be useful to know who made the report if additional information is needed to investigate.

## Working with Vendors

Vendors to Group Health include community providers, temporary or contract staff agencies, and suppliers of all our medical, surgical, and office equipment, pharmaceuticals, parts and services, and consulting and professional services. In short, every outside entity that provides services or goods to Group Health is considered a vendor.

The interests of Group Health must be the primary consideration when selecting any kind of vendor. No staff member may personally benefit from a transaction in which he or she is acting on behalf of Group Health. A bribe or kickback is anything offered with the intent to influence a decision on grounds not directly related to business merits. Such practices are not only unethical, but in many cases are illegal. In addition, it is important to make sure that our processes for choosing and establishing prices for equipment, supplies and services are not potentially distorted by the acceptance of gifts, contributions, funding or other inappropriate forms of support for Group Health clinical, business, educational or other activities.

All agreements with vendors must follow Group Health's established procurement processes.

Group Health's [Vendor Funding policies](#) provide comprehensive guidance on this topic.



**In my role at Group Health, I work with a vendor that typically gives me a gift during the holiday season. Is this OK?**

A gift of nominal value from a vendor at the holidays or other special occasions may be accepted, although frequent gifts or gifts of more than nominal value should be declined. However, you may not accept gifts of money or money equivalents (e.g., gift certificates) from vendors under any circumstances.

To avoid any appearance of a conflict of interest, special care should be taken to avoid accepting gifts from a vendor at critical points in the procurement process, such as just before or just after awarding a contract to a vendor. In addition, you should never accept any gift, however inexpensive, that could be perceived as a bribe or an attempt to influence your decisions on behalf of Group Health.

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**Group Health does business with a company that wants to fly several of us to its headquarters for a meeting. Is this allowed?**

It could be, if the vendor is not a medical vendor and it's been decided that the trip is in Group Health's interests. However, if the vendor is a medical vendor, this support cannot be accepted.

In the case of a medical vendor, if it is decided that the trip is in Group Health's interests, Group Health should pay for the travel and related expenses. Group Health's [vendor funding policies](#) offer additional guidance on this and similar topics.

## Proprietary Information

Proprietary information is sensitive information that is owned by Group Health and which gives us certain competitive advantages. Most information regarding Group Health business activities is confidential and proprietary to Group Health. Examples of confidential and proprietary information include patient and member information, strategic planning documents, sales reports and data, marketing reports and data, customer lists, broker lists, Group Health-issued materials or supplies, staff information, information stored in various Group Health systems, and Group Health's trade secrets, policies and procedures and clinical guidelines. Each of us has a responsibility to maintain the confidentiality of this information in accordance with federal and state laws and Group Health policies.



### How do I know what kinds of business information must be kept confidential?

Any information that is important to Group Health and to our strategic or competitive position must be protected. If you have any questions about how the information related to your job should be handled, you should speak to your manager.

## Protection of Group Health Assets

Group Health assets must be protected and used only for authorized business purposes. These assets include facilities, equipment, computers, supplies, reports, records, software, trademarks, and intellectual property (e.g., policies and procedures, clinical guidelines), among others.



I know that Group Health permits reasonable use of Group Health e-mail for personal reasons. Is it OK for me to use Group Health e-mail to promote my personal business if it's not excessive?

Absolutely not. Even though incidental personal use is permitted, Group Health e-mail is intended to be used primarily for Group Health business purposes. Group Health's facilities, computers and other resources should never be used for the personal gain or advantage of staff members.

Is it OK for me to use my Group Health computer to check my Facebook page during my lunch hour?

The answer is, it depends. Unless you are accessing social media for approved business purposes, you may use them only at breaks and lunch. In some environments, such as public areas with customer facing staff, even this might not be appropriate. And, in other situations, it might not be clear to others when a person is actually on a break. So, work with your manager to understand rules for appropriately accessing social media for personal use. Group Health also has specific requirements for staff regarding use of Group Health social media sites and for posting content concerning Group Health on other social media. It's a good idea to be sure you are familiar with these.

## Information Security

As Group Health staff, we are the first layer of security when it comes to protecting Group Health's sensitive business data. We have a responsibility to protect this important information from harm and unauthorized use. The best way to ensure we are meeting this responsibility is to follow the standards and safeguards Group Health has established to reduce the risk of exposure.

This includes limiting the amount of sensitive business data you access to only what you need to do your job, locking your workstation when you are away from your desk, keeping your passwords secret, and learning how to keep sensitive business data safe and secure when using portable electronic devices or removable media. [Enterprise Security Assurance \(ESA\)](#) is available to answer questions and take reports about information security concerns.

Enterprise Security Assurance can be reached at [enterprisesecurity@ghc.org](mailto:enterprisesecurity@ghc.org) or 206-901-6789 (CDS 600-6789).

You may also report an information security concern to the Compliance Hotline by phone at 1-800-741-7817 or [online](#).



**Information Security is such a big and complex issue. Is there really anything I can do to stop hackers who want to steal Group Health's member, patient, and confidential business data?**

**Yes, and Group Health is relying on you to do it. You can reduce risks to Group Health's information assets with a few simple precautions:**

1. Don't share your computer passwords with anyone — ever. Group Health will never ask you to share your passwords with any other person, employed by Group Health or not.
2. Lock your computer when you step away from your work station.
3. Physically secure portable devices, such as laptops, smartphones and USB thumb drives.
4. Do not open email attachments from unknown senders, or attachments that you didn't request or expect.
5. Carefully scrutinize internet links in email or on the web. Hackers often try to bait folks into clicking on a link that might infect their computers with a virus or trick them into revealing their login information.

**For more information, please see the [FAQ](#) developed by [Enterprise Security Assurance](#).**

## Compliance Education

The laws and regulations that govern Group Health's system of care are complex and constantly changing. Keeping current on and refreshing our understanding of external expectations and internal policies is a necessity in our business. For this reason, Group Health offers general compliance education for all staff as well as training that is specific to particular jobs. The education and training methods may include group presentations, online courses, and other formats. As Group Health staff, we are expected to participate in all required compliance education. This participation is important to our individual professional development and to Group Health's commitment to doing business right.



**Why am I required to complete annual compliance and ethics training?**

Annual compliance training is important for reminding you of your personal responsibilities in supporting compliance and ethics at Group Health. This includes refreshing your knowledge of the Code of Conduct, policies and other requirements which change periodically and reaffirming your commitment to doing the right thing while working at Group Health. It's useful for highlighting important or high-risk topics and for helping to keep compliance and ethics top of mind while we go about our daily work. In addition, annual compliance training is a requirement of some regulators.



# Our Commitment to Doing Business Right

## Following Laws, Regulations and Policies

Obeying the many laws and regulations that govern our business is not only the right thing to do, it is a basic expectation of our patients and members, regulators, and other customers. Group Health has its own policies and procedures, many developed to keep us in compliance with external requirements, which we must also understand and apply to our daily work. We all share in the responsibility of following applicable laws, regulations, and policies while conducting Group Health's business. Your direct supervisor, manager or chief can help you determine what laws and policies are most pertinent to your job.

The laws and regulations that apply to Group Health are not static. Our industry is becoming ever more regulated, and new requirements are established on an ongoing basis. Our failure to comply with these rules and regulations could subject Group Health and individual staff members to civil and criminal fines and penalties. Therefore, it is important for Group Health and its staff to keep up with these changes

## Fraud, Waste and Abuse

As Group Health staff, we are accountable for helping to prevent, detect, and correct fraud, waste, and abuse in our system of care. Key to this accountability is learning to recognize what fraud, waste and abuse are.

- Fraud is an intentional deception or misrepresentation that benefits a person or organization.
- Waste (inefficiencies) is the thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of resources, whether intentional or unintentional, to the detriment or potential detriment of Group Health or a government program.
- Abuse (bending the rules) is improper behavior or billing practices.

It is our duty to avoid such behavior and to report any activity that we suspect of being fraud, waste or abuse. Not only is it expected by our members and patients in order to keep health care affordable, it is required by our contracts with federal and state government.

For questions or concerns about fraud, waste and abuse, you should do one of the following:

- Contact the Special Investigations Unit (SIU) by phone at 206-988-2967 (CDS 600-2967).
- Submit a question or report through the SIU website.
- Call the Compliance Hotline at 1-800-741-7817.
- Make a report to the Compliance Hotline online.



## Marketing and Advertising

We have a responsibility to Group Health and to our customers to represent Group Health's products and services to the public in a manner that is true, fair and understandable. The emphasis should be on the quality, comprehensiveness and value of these products and services. The information presented in Group Health's marketing materials and advertising is intended to be complete, accurate, and non-deceptive.



**I am active on a social media site. Is it OK for me to post information that would be good for Group Health's business?**

Yes, subject to specific requirements. Unless you are a designated spokesperson for Group Health, you should make it clear that you're speaking for yourself and not Group Health as an organization. Be sure to disclose your employment with Group Health. Always be courteous, respectful, truthful and act with integrity. Use good judgment and don't disclose any personally identifiable information (PII), personal health information (PHI), or Group Health business information. Additional information and guidance on this topic are available on Connection.

## Antitrust

Group Health competes fairly and abides by antitrust laws. Business conduct that interferes with competition, such as agreeing or attempting to agree with competitors to fix prices, divide geographic markets, or making other agreements intended to improperly restrict competition, is illegal and therefore unacceptable at Group Health.

## Billing Practices

We must do our best to make sure that the bills Group Health produces are accurate. This means issuing bills only for services that were actually delivered, coding services so that bills are correct and appropriate, and supporting services delivered with appropriate medical documentation. Our billing practices must comply with applicable payer agreements and other requirements.

## Government Investigations

Group Health cooperates fully with authorized government investigations. If you become aware of an investigation or are approached by a person representing him- or herself as an investigator, or if you receive a subpoena or other written request for information related to an investigation, you should promptly contact the Group Health Legal Department for assistance.

When participating on Group Health's behalf with a government investigation, you must not:

- Destroy or alter any documents or records that have been requested by a government agency or in other situations where Group Health is obligated to retain documents or records.
- Lie or make false statements to a government investigator.
- Attempt to persuade another Group Health staff member or any other person to provide false or misleading information to a government investigator.
- Fail to cooperate with a government investigation.

## Using Group Health's Funds Properly

Group Health funds may not be used for any improper, unethical, or illegal purpose. Group Health is a non-profit, tax exempt organization regulated by the Internal Revenue Service (IRS). This status is a privilege and Group Health is required to comply with strict IRS rules to maintain it.

Staff may not use Group Health funds or assets to support, contribute to or oppose the political campaign of any candidate for public office. If you have a question about the prohibition against using Group Health funds or assets in support of a political campaign, you should consult with the Group Health Chief Compliance and Ethics Officer.

A payment considered improper for a Group Health staff member is also prohibited when made by an agent, consultant, or other third party on behalf of the staff member. This is also true for a staff member who knows or has reason to know that a payment will be made. Making a payment to a third party for a purpose other than what is described on the payment documentation is also prohibited.

## Record Keeping

Accurate records are critical to Group Health's business. Records are kept for many different purposes, including documenting the care and benefits our patients and members receive and accounting for our revenues correctly. Many are reviewed by our regulators. It's very important that all of our record keeping is complete, accurate, legal and proper. This means recording and reporting necessary information fully, accurately, and honestly and never falsifying or altering Group Health records.

Records will be retained or disposed of in accordance with legal and regulatory requirements and Group Health policy. Records pertaining to pending litigation, litigation holds, governmental investigations, or audits may not be destroyed without express approval from Group Health's [Chief Compliance and Ethics Officer](#) or [Legal Department](#).

## Working with the Government

Group Health provides care and services to many patients and members through its contracts with the state and federal government. These contracts call for Group Health to follow various federal and state laws, which have many specific requirements in addition to those that govern our commercial lines of business. It is important that Group Health comply with these laws because we agreed to do so in our contracts, and also because there are serious penalties for non-compliance.

Additionally, you should familiarize yourself with the policies and procedures that apply to your job, consistent with the expectations of Group Health's government contracts. Your direct supervisor, manager or chief will be able to direct you to the ones that are most appropriate for you.

## Medicare

Group Health is committed to serving Medicare members and patients. It is essential that we fulfill our obligations to this important and growing program. Staff who perform services or functions related to the Medicare program are required to have knowledge and training specific to Medicare requirements.

The Centers for Medicare and Medicaid Services (CMS), the federal agency that administers Medicare, expects Group Health to comply with all of the laws and regulations that apply to it. This includes all of the regulations governing the Medicare Advantage Program and the Medicare Prescription Drug Program, and manuals, training materials, memos and guides produced by CMS. We will not list all of the federal laws applicable to this program here, but we will highlight a few important ones. Click on each link below for additional information.

### Civil and Criminal False Claims Acts (FCA)

The civil and criminal Federal false claims acts are laws that address fraudulent activity in dealings with any federally funded contract or program, including Medicare and Medicaid. These laws prohibit fraud in billing the federal government and provide liability for any person or entity that intentionally and/or deliberately disregards these rules.

### Anti-kickback Statute

This federal law is intended to address the concern that the decisions of health care providers might be improperly influenced by a profit motive, and to protect federal health care programs from additional costs and overutilization. Under this criminal statute, it is a felony for a person to knowingly and willfully offer, pay, solicit, or receive anything of value (i.e., "remuneration") in return for a referral or to induce generation of business reimbursable under a federal health care program.

### Physician Self-referral (Stark) Statute

This federal law prohibits a physician from making referrals for certain designated health services (DHS) payable by Medicare to an entity with which he or she (or an immediate family member) has a financial relationship (ownership, investment, or compensation), unless an exception applies. It prohibits the entity from presenting or causing to be presented claims to Medicare (or billing another individual, entity, or third party payer) for those referred services and establishes a number of specific exceptions. It grants the federal Department of Health and Human Services Secretary the authority to create regulatory exceptions for financial relationships that do not pose a risk of program or patient abuse.

## Government Employees

In general, Group Health and staff acting on its behalf should not provide or pay for gifts, meals, travel expenses or gratuities for government employees. There are strict rules against the giving of gifts or any item of value to most government employees. Government employees can be expected to pay for their own expenses when working with Group Health.

Due to the potential appearance of a conflict of interest, the federal government has specific rules in place that relate to Group Health hiring any current or former government employee. Human Resources or Legal should be consulted before any such hiring decision is made.

## Procurement Integrity Act

As a contractor to the federal government, Group Health is subject to the Procurement Integrity Act. This act prohibits Group Health from:

- Receiving contractor bid or proposal information that would give Group Health an unfair competitive advantage,
- Giving anything of value to a procurement official,
- Discussing or making an offer of employment to a federal government or military procurement official, or certain family members. Some procurement officials have a two-year ban, and some have a lifetime ban on employment discussions.

# Our Commitment to Our Communities

## Community Benefit

Group Health exists to improve the health and well-being of our communities. Further, as a 501(c)(3) charitable organization, Group Health Cooperative is exempted from most federal income taxes in exchange for its community benefit obligation.

Group Health fulfills this charitable purpose in a number of important ways, including participation in state programs for low-income populations, conducting research, assisting in the training of physicians and other health professionals, developing education programs to promote population health, and supporting other community organizations and services.

## Public Service

Group Health encourages us to participate in our personal and professional communities. As Group Health staff, there are many opportunities to contribute. These include supporting the [Group Health Foundation](#), and volunteering with many Group Health sponsored or supported events and activities throughout the year

Group Health also encourages our participation in professional societies, medical societies, [Accreditation Association for Ambulatory Health Care \(AAAHC\)](#), [Det Norske Veritas \(DNV\)](#), [National Committee for Quality Assurance \(NCQA\)](#) and other regulatory or accrediting agencies. Group Health and Group Health Physicians employees may serve as officers and directors of these associations, subject to approval process and requirements in applicable Human Resources policies.

## Speaking on Public Issues

Group Health and Group Health Physicians employees are encouraged to be fully engaged citizens of our communities. However, when we speak out on a public issue, we do so as individuals unless we have been designated as a spokesperson for Group Health on that particular issue. Any staff member who speaks out and is not a designated spokesperson should make it clear that he or she is not representing the views of Group Health.

## Political Involvement

Guidance for political involvement is similar to that for speaking on public issues. Political views must be expressed as individual opinions, not those of Group Health, and no political activity may occur on Group Health property. As a 501(c)(3) organization, Group Health is prohibited from endorsing any candidate for elected office or engaging in other political activity as defined by the IRS.



### Can I be active in a political party while employed at Group Health?

Yes, you may, so long as your views are expressed as your opinions, and not those of Group Health. In addition, no political activity may occur on Group Health property and no Group Health resources may be used to engage in such activity.

## Environmental Sustainability

Group Health is committed to lessening our impact on the environment. We do this through:

- reducing the amount of waste we produce,
- conserving energy and resources,
- promoting environmental responsibility

All staff members are asked to lessen their carbon footprint at work by recycling appropriately, reducing waste and reusing resources, turning off items each day, and joining carpools or vanpools, riding the bus, or considering commuting by bicycle or walking. This not only helps Group Health promote environmental sustainability for healthcare, it is also good business strategy.

# Contacts and Resources

## Office of Compliance and Ethics contacts and other helpful resources



### **Office of Compliance and Ethics:**

206-448-5819 (CDS 320-5819), [complianceoffice@ghc.org](mailto:complianceoffice@ghc.org)

### **Chief Compliance and Ethics Officer:**

[Carolyn Barton](#), 206-448-5002 (CDS 320-5002), [barton.cm@ghc.org](mailto:barton.cm@ghc.org)

### **Group Health Physicians Chief Compliance Officer:**

[Rob Nohle](#), 206-448-6519 (CDS 320-6519), [nohle.r@ghc.org](mailto:nohle.r@ghc.org)

### **Compliance Hotline:**

Call toll-free 1-800-741-7817, or [report online](#).

### **Do you have an employment or HR concern or question?**

If you are a Group Health employee, contact the [HR Service Center](#) at 206-988-7777 (CDS 600-7777) or [hrservicecenter@ghc.org](mailto:hrservicecenter@ghc.org). If you are a Group Health Physicians employee, contact the [HR Department](#) at 206-448-6544.

### **Are you concerned about Information Security?**

Contact [Enterprise Security Assurance](#) at 206-901-6789 (CDS 600-6789) or [enterprisesecurity@ghc.org](mailto:enterprisesecurity@ghc.org).

### **Do you have a question or concern about Privacy?**

Contact the [Privacy Office](#) at 206-448-2422 (CDS 320-2422) or [privacy.office@ghc.org](mailto:privacy.office@ghc.org).

### **Do you wish to report a system failure, near miss or unexpected outcome that occurred during the delivery of care to our patients?**

Contact [Patient Safety](#) at 206-326-4940 (CDS 330-4940) or [patientsafety@ghc.org](mailto:patientsafety@ghc.org).