

U OF U HEALTH PLANS + HEALTH CHOICE UTAH
CODE OF CONDUCT

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OUR CODE OF CONDUCT

Our Code of Conduct applies to all current employees of University of Utah Health Plans (“UUHP”) and Health Choice Utah (“HCU”), including Board members, executive officers, employees, interns, independent contractors, those using business resources or facilities, volunteers, anybody acting as our agent, and all umbrella entities. This publication is not an attempt to define what one should and should not do, but rather aims to communicate our expectations of proper conduct and what professional conduct we value and exhibit.

This document is intended as a complementary publication to University of Utah and University of Utah Health Hospitals and Clinics policies, procedures and guidelines already established. In the event of a conflict, University of Utah and University of Utah Health Hospitals and Clinics policies and procedures may take precedence.

ABOUT US

University of Utah Health Plans was formed in 1998. We are committed to improving the member experience, quality of care, health of populations, and reducing the cost of care. We currently serve members in the Mountain West, specializing in the health plan administration of medical, mental health, and pharmacy benefits for fully insured and self-funded employer groups, individuals and families, as well as Medicare and Medicaid.

We value innovation and collaboration. As a health care partner, we are committed to improving the health of the community, providing access to the highest quality of care, and delivering exceptional value to our members, clients, and the community.

We are leaders in health care transformation. We recognize the importance of population health and payment reform. We have developed extensive care management and value-based payment programs that improve health and align provider reimbursement with value and positive outcomes. Being integrated with University of Utah Health, we are uniquely positioned to bring greater value, better cost-efficiency, and an increased patient focus to our members and clients. We believe in the power of integrated collaboration and the significant influence it has on cost, quality, and care.

Health Choice Utah began operations in 2012 and is a superbly positioned subsidiary of University of Utah Health Insurance Plans. Our Medicaid health plan, Health Choice Utah, contracts with all of Utah's major health systems and provides coverage in all 29 counties. Our Medicare Advantage Special Needs Plan, Health Choice Generations Utah, provides coverage along the Wasatch Front and in Tooele County. Health Choice Generations has prescription drug coverage and offers other extra benefits such as over-the-counter medications, dental, and vision services at no extra cost to our members. Health Choice engages with our members, providers, and the community at large using a personalized and highly visible approach. This includes collaborating with key stakeholders in the community, assigning plan representatives to make regular contact with providers in their designated areas, and assisting members with their health care, community resource, education, and plan administrative needs. Health Choice built its provider network with our members at the forefront. Our goal is to facilitate quality health care, programs, and services to support our members on their path to wellness.

OUR MISSION

Our mission is to serve the people of Utah and beyond by continually improving individual and community health and quality of life. This is achieved through excellence in patient care, education, and research; each is vital to our mission, and each makes the others stronger.

U OF U HEALTH PLANS' PROMISE STANDARDS

Our vision is to deliver exceptional value to our clients, our members, and our employees. To achieve these goals, we must uphold our PROMISE standards.

The PROMISE standards were created by employees, for our employees. These PROMISE standards directly relate to our core values: compassion, trust, collaboration, innovation, responsibility, diversity, integrity, quality, and safety. As you engage in your role as a U of U Health Plans employee, please remember the PROMISE standards and use them as your guide to appropriate behavior every day.



P: PEOPLE CENTERED

R: RESPECT

O: OWNERSHIP

M: MAKING A DIFFERENCE

I: INNOVATION

S: SAFETY

E: EXCELLENCE

CREATING A SAFE WORKPLACE

Respect for our Customers and Staff: It is part of our culture to treat all members of our community with dignity and respect. This includes students, faculty, staff, alumni, participants in university-sponsored events or organizations, and friends of the institution. All employees are expected to comply with our non-discrimination policy, which prohibits any form of harassment or discrimination at the University based on race, color, national origin, gender, religion, sexual orientation, age, or veteran status. Evidence or complaints of practices inconsistent with these policies should be reported to the U of U Health Compliance Office or to the Health Plans Compliance Office.

Zero Tolerance for Harassment: We do not tolerate any form of harassment, including any verbal or physical behavior that is intimidating, threatening, or demeaning. Harassment is unacceptable in our offices, in any other work setting, at a sponsored event, or while using electronic communication.

Honest and Respectful Communication: We provide one another with accurate and timely information about business issues professionally and courteously, always welcoming differing opinions and expressions of concern. Communications must remain professional and never be hostile or threatening. Our open communication is an expression of our respect for each other.

Our records may be subject to the Government Records Access and Management Act (GRAMA). Any record subject to GRAMA may be requested by a member of the public. Employees should always assume communications and records may be made public.

Equal Employment Opportunity and Non-Discrimination: We base employment-related decisions on an individual's skills, qualifications, job performance, business needs, and other lawful factors. We do not base any decisions on factors that are discriminatory or prohibited by law, including but not limited to, race, color, sex, religion, age, disability, veteran status, national origin, ancestry, sexual orientation, gender identity, marital status, domestic partner status, genetic information, and citizenship status.

DOING THE RIGHT THING

Being a Stand-Up Employee: Employment with us carries with it a commitment to work to meet the organization's objectives, goals, and mission. Our excellence is based upon the high quality and outstanding contributions of all our employees.

Representing Us Outside the Workplace: There are many occasions when employees act as representatives of or ambassadors for our institution to outsiders, such as presenting at or attending professional conferences, interviewing for potential faculty and staff, negotiating contracts with outside persons and entities, or interacting with community, state, and federal government officials. We must always be mindful that such representation must be characterized by professionalism, honesty, and accuracy. This expectation includes employee behavior in-person and on social media.

All employees are expected to comply with relevant laws, grant and contract requirements, regulations, policies and practices, and all applicable professional standards.

Bribes + Gifts: We always strive to provide first-class service while competing ethically and fairly. To uphold these objectives, we cannot offer, solicit, or accept bribes, objects of value, or other benefits to or from another party to obtain or retain an unfair business advantage. Moreover, we must avoid any conduct that creates the appearance of improper business activity. It is illegal for a public officer or employee to knowingly receive for themselves or another a gift of substantial value. As a best practice, it is advisable to assume that a vast majority of gifts cannot be accepted.

Relationships with Suppliers and Contractors: We expect our suppliers and contractors to act in a manner that is consistent with our Code of Conduct while satisfying their contractual obligations.

Accurate Record Keeping and Retention: Accurate record keeping is an essential component of our business. We have the responsibility to make sure our records are accurate, well-maintained, easily accessible, and retained in accordance with policy unless otherwise specified on a case-by-case basis.

Contracts Obligating the University: Individuals must follow University policies with regard to entering into contracts with entities or individuals outside of the University. Contracts generally require input and legal review by the University of Utah Office of General Counsel. Contracts must be signed by an authorized representative of the health plan. If you are unsure of whether you have authority to enter into a contract on behalf of the health plan, check with the Health Plans Compliance Office.

Money Laundering: We must be aware of the signs of money laundering when dealing with third parties. Money laundering is illegal in the United States. Please contact the U of U Health Compliance Department immediately if a third party:

- Proposes an unusual transaction that doesn't have a legitimate business purpose.
- Does not provide complete information, provides false information, or fails to provide requested financial details.
- Appears to be conducting business through a shell corporation.
- Makes an effort to conceal identifying information.

Our Compliance Program: We are committed to maintaining a working environment that fosters conducting business with integrity and that enables us to meet the highest ethical standards. This commitment to compliance extends to contracted partners that support our business operations.

The Compliance Program is designed to:

- Ensure compliance with all applicable laws, rules and regulations
- Prevent, detect, and correct non-compliance
- Reinforce our commitment to compliance

Adhere to Fraud, Waste, and Abuse Laws: We comply with all applicable laws barring healthcare-related fraud, waste, and abuse. Federal and state health care anti-kickback laws prohibit illegal payment intended as compensation for favorable treatment or other improper services. Federal and state false claim laws make it a crime for any person or organization to knowingly make a false record or file a false claim regarding any federal health care program. The federal False Claims Act also contains a provision that protects a whistleblower against retaliation.

PRIVACY AND SECURITY

We have a legal and ethical responsibility to safeguard the privacy of all members and protect the confidentiality of their health information. The use of protected health information (PHI) is restricted to those who have a legitimate need to use it for treatment, payment, or other routine health care operations. Most other disclosures require member authorization. Individuals must follow privacy policies and report any suspected breaches of member privacy policies to the Information Privacy Office. Contact your supervisor or the Information Privacy Office with questions or concerns about privacy or security issues. Privacy policies, as well as the Confidentiality and Information Security Agreement, are located at <https://pulse.utah.edu/site/comser/infpriv/Pages/Home.aspx>.

COMPANY SAFEGUARDS

Protecting Assets: Company property meant to be used for business is to be used responsibly and protected from misuse, damage, theft, or any other improper handling. Misuse of assets takes many forms and can involve some deception or misrepresentation of facts and information for personal gain as well as the deliberate appropriation of property or funds for personal use. Company property also includes computers, networking resources, email systems, voice systems, and other computer-processed information protected from improper access, damage, or theft. Subject to local laws, we may review email or other electronic communication to determine compliance with our Code, values, policies, and the law. Intellectual Property is also protected, including business methodologies, unique products, patents, trademarks, copyrights, and trade secrets. U of U Health Plans and Health Choice Utah owns all Intellectual Property (IP) developed on our company property or using company resources. We respect the IP of other entities; we do not improperly copy, download, access, or use others' work, including photos, images, articles, documents, computer programs, movies, or music, in violation of applicable law or any licensing or other agreement.

Avoiding Conflicts of Interest: We are trusted to always act in the best interest of the company and our clients by avoiding conflicts of interest. A conflict of interest can arise if an employee's professional judgment is, or might be, influenced by personal interests. This influence could cause the interests of our company to be compromised or interfere with the employee's performance of duties. Any activity, situation, or relationship that conflicts or appears to conflict with the company interests must be promptly and fully disclosed.

REPORTING ETHICS VIOLATIONS

Speak Up: The Ethics and Compliance Hotline (EthicsPoint, **888-206-6025** or secure.ethicspoint.com) is a resource for all employees to ask questions, raise issues, seek advice, and report concerns related to proper business conduct and ethical dilemmas. Reports may be made anonymously. Any dishonest or improper act by an employee (i.e., that violates the law, wastes money, or endangers public health or safety) is of great concern to us. All employees are encouraged to report suspected improprieties to their supervisor or directly to a higher level if the supervisor is involved. Additional reporting methods include:

- **UUHP Health Plans Compliance Office:**
HealthPlansCompliance@utah.edu
- **UUHP Fraud, Waste, and Abuse:**
HealthPlansReportFraud@utah.edu
- **Health Choice Utah Compliance Office:**
Compliance@HealthChoiceUtah.com
- **Health Choice Utah Fraud, Waste, and Abuse:**
Fraud_Waste_Abuse@HealthChoiceUtah.com

If you are aware that a crime has been committed, you should report it immediately to police.

Non-Retaliation: We believe it is essential for individuals to feel empowered to speak up about any legal, regulatory, discriminatory, or any other company policies they witness or experience without fearing a threat of retaliation. Not only is it against policy to retaliate against those who report concerns, but it is also illegal under both state and federal law. We are committed to maintaining an inclusive and healthy work environment. Retaliatory behavior will not be tolerated, and those who engage in retaliatory behavior may be subject to disciplinary action up to termination of one's employment. Retaliatory action includes, but is not limited to:

- FAILURE TO CONSIDER FOR PROMOTION
- DEMOTION
- SUSPENSION
- TERMINATION
- ADVERSELY IMPACTING WORKING CONDITIONS OR CREATING A HOSTILE WORK ENVIRONMENT
- REDUCTION IN COMPENSATION OR BENEFITS

ADDITIONAL CONTACT INFO

DEPARTMENT	PHONE OR EMAIL	URL
U OF U HEALTH PLANS COMPLIANCE OFFICE	HEALTHPLANS COMPLIANCE@UTAH.EDU	HTTPS://PULSE.UTAH.EDU/SITE/HPA/COMPLIANCE/
U OF U HEALTH PLANS SPECIAL INVESTIGATIONS UNIT (TO REPORT SUSPECTED FRAUD, WASTE, OR ABUSE)	HEALTHPLANSREPORTFRAUD@UTAH.EDU	HTTPS://PULSE.UTAH.EDU/SITE/HPA/SIU/PAGES/HOME.ASPX
HEALTH CHOICE UTAH COMPLIANCE OFFICE	COMPLIANCE@HEALTHCHOICEUTAH.COM	HTTPS://HEALTHCHOICEUTAH.COM/CONTACT/
HEALTH CHOICE UTAH SPECIAL INVESTIGATIONS UNIT (TO REPORT SUSPECTED FRAUD, WASTE, OR ABUSE)	FRAUD_WASTE_ABUSE@HEALTHCHOICEUTAH.COM	HTTPS://HEALTHCHOICEUTAH.COM/CONTACT/
ETHICS AND COMPLIANCE HOTLINE	888-206-6025	HTTP://WWW.ETHICSPPOINT.COM
HOSPITAL & CLINICS HUMAN RESOURCES	801-581-6500	HTTPS://PULSE.UTAH.EDU/SITE/HHR
U OF U HEALTH COMPLIANCE SERVICES OFFICE	801-213-3601	HTTPS://PULSE.UTAH.EDU/SITE/COMSER/PAGES/HOME.ASPX
U OF U HEALTH INFORMATION PRIVACY OFFICE	801-587-9241	HTTP://PRIVACY.UTAH.EDU/
INFORMATION SECURITY OFFICE	801-585-4000 X 1	HTTPS://SECURITY.IT.UTAH.EDU/
INTERNAL AUDIT	801-585-1593	HTTP://WEB.UTAH.EDU/INTERNAL_AUDIT/
OFFICE OF EQUAL OPPORTUNITY/ AFFIRMATIVE ACTION	801-581-8365	HTTPS://OEO.UTAH.EDU/
OFFICE OF GENERAL COUNSEL	801-585-7002	HTTP://WWW.LEGAL.UTAH.EDU/
PURCHASING	801-581-7241	HTTP://WWW.PURCHASING.UTAH.EDU/
CLINICAL RESEARCH COMPLIANCE	801-213-3601	HTTPS://PULSE.UTAH.EDU/SITE/COMSER/CLRECO/PAGES/HOME.ASPX
TAX SERVICES AND PAYROLL ACCOUNTING	801-581-3428	HTTP://WWW.TAX.UTAH.EDU/