HEALTH PLANS
UNIVERSITY OF UTAH

HEALTH PLANS CODE OF CONDUCT

HEALTH | CHOICE
UTAH

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OUR CODE OF CONDUCT

Our Code of Conduct applies to all employees, contractors, volunteers, board members, interns, and others acting on behalf of University of Utah Health Plans and Health Choice Utah. 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 the University of Utah Ethical Standards & Code of Conduct and the University of Utah Health policies, procedures and guidelines. In the event of a conflict, the University of Utah Ethical Standards & Code of Conduct and University of Utah Health 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, and Medicaid.

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

Health Choice Utah began operations in 2012 supporting Medicaid programs and is a subsidiary of University of Utah Health Insurance Plans. 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 lead the way in healthcare transformation. We recognize the importance of population health and payment reform, which is why we have developed extensive care management and value-based payment programs that deliver positive outcomes and improve health.

THE PROMISE STANDARDS

Our vision is to provide an exceptional experience to our members, providers, business and community partners, and our employees. Although U of U Health Plan customers may be different than other areas of the University, the PROMISE standards represent the same core values that should be top of mind in all that we do.

DOING THE RIGHT THING

Commitment to Ethical Conduct: Employment with us carries with it a commitment to work to meet the organization's objectives, goals, and mission in a fair and ethical way. Acting with integrity is expected in all of our business interactions. Our excellence is based upon the high quality and outstanding contributions of all our employees.

Commitment to Compliance: We are committed to complying with all applicable state and federal laws, regulations, and rules as well as requirements under applicable state and federal contracts. Our Compliance Program is designed to prevent, detect, and correct noncompliant and unethical conduct. Compliance works with applicable stakeholders, individual supervisors, and Human Resources concerning investigation findings and any corrective actions resulting from identified non-compliance.

We cooperate with government audits, inquiries, and investigations and are accurate and truthful in answers to their questions. Government requests for information, documents, or interviews should be referred to the Compliance Office or Legal Department prior to responding.

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.

Nondiscrimination: We do not discriminate on the basis of race, color, national origin, disability, age, or sex.

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.

Conflict of Interest and Vendor Gifts: We follow the University of Utah Conflict of Interest requirements and Vendor Gifts Policy. If you are unsure about whether a conflict may exist or have questions about whether something qualifies as a "gift" contact the Compliance Office.

Contracts Obligating the University: Individuals must follow University policies with regard to entering into contracts. 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 Compliance Office.

PRIVACY AND SECURITY

Safeguarding member information: 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 U of U Health Privacy policies and report any suspected breaches of member privacy violations to the Information Privacy Office.

ETHICS & COMPLIANCE REPORTING

Speak Up: The Ethics and Compliance Hotline (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 issues of noncompliance, suspected FWA, proper business conduct and ethical dilemmas. Reports may be made anonymously. 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:

- **Health Plans Compliance Office**: HealthPlansCompliance@utah.edu
- **Health Plans Fraud, Waste, and Abuse**: HealthPlansReportFraud@utah.edu

Non-Retaliation: We believe it is essential for individuals to feel empowered to speak up. Our policies prohibit retaliation against anyone who reports a concern in good faith or asks for advice about a compliance issue.