



# PRINCIPLES OF RESPONSIBILITY

KAISER PERMANENTE'S CODE OF CONDUCT



## A Message from the Leadership Team

Dear Colleagues,

For the past 65 years, you have helped Kaiser Permanente earn the trust of our members, patients, customers, and business partners. This trust is based on our unwavering commitment to our mission of providing high-quality, affordable health care and services and to improving the health of our members and the communities we serve. All of us — physicians, employees, managers, and leaders — have integral roles to play in securing our organization's future: Kaiser Permanente's reputation is in your hands. We all have an accountability to be sure that we understand our *Principles of Responsibility* and that we are in compliance and full support of these principles.

We are at a very exciting juncture in our history with our nation's movement to reform health care. Unique Kaiser Permanente traits, such as our model for total health and our commitment to electronic health records through Kaiser Permanente HealthConnect®, give us an opportunity to continue to be successful and a model organization for our country. As a result, it is important that we all continue to uphold the reputation of excellence that Kaiser Permanente has earned over the years.

Along with opportunities, health care reform also brings added scrutiny on compliance with all new and existing laws, regulations, and accreditation standards by regulatory agencies and the public. Kaiser Permanente's code of conduct, the *Principles of Responsibility*, provides us with the tools we need to do the right thing in taking on new opportunities and meeting all laws and requirements.

No code of conduct can anticipate every situation we might face as a health care organization; however, Kaiser Permanente's *Principles of Responsibility* embraces our core values and guiding principles and is intended as a resource to help guide us in exercising good judgment, asking questions when uncertain, and speaking up when needed.

We urge you to read the *Principles of Responsibility*, refer to it often in your daily work, and talk to your colleagues and leaders about it. If you are aware of issues that might violate this code, you must report them to your chief or immediate supervisor, your human resources representative, your compliance officer, or the Kaiser Permanente Compliance Hotline.

We are fortunate to be guided by principles that have served us well and that will continue to make us proud. Thank you for the work and care you provide every day. Together our efforts to act with integrity, perform ethically, and meet compliance requirements in all we do help protect our members' health, our resources, and our good name.

Sincerely,



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## Introduction

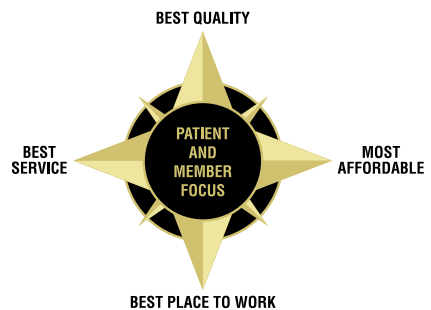
Kaiser Permanente is committed to providing high-quality, affordable health care and services that improve the health and wellness of our members and patients, as well as our customers, the communities we serve, and our nation.

The *Principles of Responsibility* is Kaiser Permanente's code of conduct:

- It is our organization's ethical compass.
- It represents our workplace values.
- It guides our work and our interactions with others.

### 1. Do the Right Thing

Use the *Principles of Responsibility* as a tool to ensure that compliance is integrated into the work we do everyday — be it service, care, or any operational duties such as strategic planning, communications, and business processes. This applies to everyone, whether you are the assistant chief of your department, an executive of your region, a salesperson in marketing, a



nurse in the neonatal intensive care unit, a staff assistant, or a phlebotomist in the lab. You should refer to this code of conduct whenever you need guidance on appropriate actions in your work and whenever your instincts tell you that something doesn't feel quite right.

If you encounter situations in your work that aren't included in the *Principles of Responsibility*, talk to any of the following:

- Your **chief** or **immediate supervisor**
- Another supervisor or manager in your area
- Your compliance officer
- The contacts listed in the following sections of the *Principles of Responsibility*:
  - o Section 1.3 Where to Go for More Help
  - o Section 10. Speak Up if You Have Any Questions or Concerns

We recognize that certain situations could arise that may warrant an exception: In these cases, please contact the National Compliance, Ethics & Integrity Office.

### 1.1 Does the *Principles of Responsibility* Apply to Me?

Compliance is everyone's responsibility. There are no exceptions. Anyone who works for or on behalf of Kaiser Permanente is required to follow all applicable laws, policies, and this code of conduct. This includes not only all of our physicians and employees (including executives and management), but also students, residents, interns, temporary employees, contingent employees, and volunteers.

**Independent contractors** and consultants are expected to read, understand, and adhere to our *Vendor Code of Conduct* when working with Kaiser Permanente. Kaiser Permanente **physicians and employees** who manage the work of contractors and consultants must ensure that they abide by all applicable policies.

All Kaiser Permanente physicians and employees are expected to use good judgment, be accountable for their actions, and conduct business with integrity and with the interests of members and patients in mind. You must also:

- Complete all required compliance training.
- Familiarize yourself with the policies, procedures, and standards that apply to your work.
- Speak up if you are ever concerned or unsure about what you are being asked to do or what you see others doing.
- Cooperate with investigations of potential violations.
- Refuse to participate in illegal or unethical acts.
- Be guardians of Kaiser Permanente's reputation and **assets**.

Failing to comply with this code of conduct is a serious violation and could result in disciplinary action, up to and including termination of employment and possible civil or criminal charges. These consequences may apply to:

- Physicians and employees who violate the code of conduct
- Anyone who attempts to retaliate against someone who has reported potential misconduct in good faith

## 1.2 Refer to and Follow Laws, Regulations, and Policies

The *Principles of Responsibility* does not address every situation or issue that could arise in your work. This code provides general direction on a broad range of issues; however, laws and regulations may exist now or in the future that have specific requirements for your particular job. Additionally, Kaiser Permanente has adopted policies and procedures that apply to your job and how you conduct yourself at work. These policies are more specific to particular jobs, and some are stricter than the standards of conduct set forth in the *Principles of Responsibility*. The Kaiser Permanente policies that apply to you can be found:

- In your department
- In the Permanente Medical Group (PMG) policies or policy manual for the physicians in each PMG
- On your regional Kaiser Permanente intranet site
- In the Kaiser Permanente Policy Library at [kpnet.kp.org/kpnpa](http://kpnet.kp.org/kpnpa)

Remember, it is your responsibility to make sure that you know which Kaiser Permanente policies apply to you and your job, and that you comply with them.

## 1.3 Where to Go for More Help

You have many contacts and resources in addition to the *Principles of Responsibility* to help you:

- Speak with your chief or immediate supervisor, HR representative or compliance officer.
- Speak with your union representative, if you are a member of a union.
- Check out the Kaiser Permanente Compliance website at [kp.org/compliance](http://kp.org/compliance) for more information.
- Call the Kaiser Permanente Compliance Hotline at 1-888-774-9100. The hotline is available toll-free 24/7. You can make an anonymous report to a trained professional.

## 1.4 At the Heart of It All: Five Guiding Principles

These guiding principles are intended to make it easier for you to do the right thing at work. They are at the heart of who we are and what we stand for. Keeping these guiding principles in mind when you do your job should make it easier for you to follow the standards of conduct in the *Principles of Responsibility*, and help us continue to make Kaiser Permanente an organization we are proud to be a part of.

### 1. Improve Our Members' Health and the Nation's Health Care

- Our cause is health. Our passion is service. We work to make lives better.
- We deliver compassionate, personalized, and proactive care to our members and patients.
- We act to improve the access, delivery, and funding of health care for the communities we serve.
- We share our knowledge and innovations through research, our support of education for community health professionals and consumers, and by helping to inform public policy.



## 2. Excel and Innovate in Our Professions

- We always strive to learn. We are dedicated to raising our own standards and the standards of our professions through continuous learning, research, training, adoption of new technology, and investment in state-of-the-art facilities.
- We deliver care and services through teamwork, because it is through collaboration with others that we can be most effective.
- We strive to be responsible stewards of the environment, and provide health care services in a manner that protects the environment now and for future generations.

## 3. Respect Members, Patients, Customers, and One Another

- When caring for our patients and serving our members and customers, we strive to act with courtesy, in a careful and considerate manner, and with professionalism.
- We protect the privacy of our members and patients and respect their autonomy, customs, and beliefs. We involve them in decisions regarding their treatment and care according to their preferences.
- We understand that we thrive when we respect one another. We are proud of our collegial environment, which honors diversity.
- We listen to and respect the opinions of others, even when our views differ.

## 4. Be Fair and Honest

- We know that we must earn our distinguished reputation every day, and understand that each health care and business decision is an opportunity to demonstrate our commitment to ethics and integrity.
- We recognize the trust others place in us, and recognize the responsibility of upholding that trust by being truthful and honest — always.

## 5. Demonstrate a Commitment to Compliance and Ethics

- Compliance means we fully adhere to federal, state, and local laws and regulations; federal health care program requirements; licensing requirements; accreditation standards; and requirements of the Centers for Medicare and Medicaid Services (CMS) and federal, state, and customer contracts.
- We never retaliate against those who, in good faith, report suspected violations of law, accreditation standards, and Kaiser Permanente policies.
- Acting with ethics and integrity in our work means that we always try to do the right thing and make the best decisions, and that we seek help — either in the *Principles of Responsibility* or in the advice of another person — when the right thing or the best decision is not clear.

## 1.5 Definitions

Some of the words used in the *Principles of Responsibility* have special meaning and are set in bold text the first time they are used in a section. When you see a word in bold text, look in this section for the definition of that word.

**Assets** Can be both tangible (physical) and intangible (intellectual). Assets include equipment, (for example, cameras, ergonomic equipment), furniture, supplies, organization funds (including purchasing cards), *electronic devices*, voicemail and instant messages, e-mail, knowledge, information, buildings, identification cards, time, and media sites (including Kaiser Permanente's Facebook pages and YouTube channels). See *Electronic devices for more information*.

**Board of directors** A group of persons having legally defined responsibilities and oversight of the activities of a particular company, association, or organization.

**Business partners** These include employer groups, brokers, *customers*, unions, and *vendors*.

**Business records** Information committed to writing in hard (paper) form or soft (electronic) form, and created to document or reference legal, business, or operational activities; also includes electronically stored information and e-mails. See the business record retention policy for your area for more information.

**Cash-equivalent gifts** These include checks, gift certificates, gift cards, coupons, or anything with an obvious cash value. See *Gifts and Modest gift*.

**Chief** An individual to whom a *physician* reports directly.

**Competitor** An individual or organization that offers products and services in some or all of the same categories as *Kaiser Permanente* and in some or all of the same geographical markets. Examples include health plans, health care insurance companies, hospitals, medical groups, independent physician associations (IPAs), medical service providers, pharmacies, private practice psychologists, and physical therapy services.

**Conflicts of interest** A situation that does not put the best interests of Kaiser Permanente and our members and patients first. These situations arise when personal or financial interests influence, or may be viewed by others as having the potential to influence, your job-related judgment or decision-making.

**Conflicts of interest questionnaire** An annual requirement for certain *physicians and employees* that requires disclosure of information that may indicate perceived, potential, or actual conflicts of interest that may need to be monitored, managed, or eliminated.

**Customers** Individuals, families, and organizations (including employers, government agencies, and labor trusts), who contract with *Kaiser Permanente* to receive health benefits.

**Electronic devices** See *Assets*. Includes desktop computers, laptops, BlackBerrys®, smart phones, flash drives, digital cameras, and any other devices that have the capability to manipulate and/or store data (for example, laptops, computers, monitors, docking stations, cellular phones and mobile devices, remote access tokens, USB storage devices, printers, and air cards).

**Employees** See *Physicians and employees*.

**Entertainment** Includes but is not limited to sporting events, theatre performances, movies, concerts, theme parks, and so forth, regardless of value.

**Financial interest** Ownership interest in stocks, bonds, debt obligations, options, rights to buy or sell stock, shares in profits, investments, or other proprietary interests in companies. Does not include mutual fund shares or insubstantial share holdings of a publicly held company.

**Health care providers** Includes *physicians and employees* who provide patient care directly and any employee-owned business that provides health care services, such as a residential care facility or home health services.

**HealthConnect** See *Kaiser Permanente HealthConnect®*.

**Gifts** Anything of value received with no expectation of anything given in return. See *Cash-equivalent gifts and Modest gift*. See *Section 8.3 How to Handle Gifts and Business Courtesies for exclusions*.

**Honoraria** Anything of value given as a token of appreciation for services rendered, such as fees paid to a speaker.

**Immediate supervisor** An individual to whom an *employee* reports directly. This could be a supervisor, manager, director, *chief*, or executive.

**Independent contractor** A person or entity not employed by *Kaiser Permanente* that renders, on a contractual basis, a specific service or performs a specific assignment or task for specified compensation and for specified results. This differs from the employer-employee relationship in which *Kaiser Permanente* has the right to supervise and control the manner of performance of the service. Note that individuals who are clearly employees of other companies that withhold their payroll taxes (such as state licensed temporary agencies, third party brokers, consulting/contracting firms, registry services, and privately contracted special duty nursing services or *vendors* who provide products on an ongoing basis for use or resale) are not considered independent contractors.

**Information systems** Includes electronic systems for medical and health plan records, e-mail, voicemail, instant messaging, and the intranet and Internet.

**Kaiser Permanente** or **Kaiser Permanente entities** The Kaiser Permanente Medical Care Program consists of the following separate legal entities: Kaiser Foundation Health Plan, Inc.; Kaiser Foundation Hospitals; Kaiser Foundation

Health Plan of Colorado; Kaiser Foundation Health Plan of Georgia, Inc.; Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc.; Kaiser Foundation Health Plan of Ohio; Kaiser Foundation Health Plan of the Northwest; Archimedes; Inc.; Camp Bowie Service Center; Health Care Management Solutions, LLC; Kaiser Health Plan Asset Management, Inc.; Oak Tree Assurance, Ltd.; Kaiser Properties Services, Inc.; Ordway International, Ltd.; Ordway Indemnity, Ltd; KP OnCall, LLC; Kaiser Permanente International; Kaiser Permanente Oregon Plus, LLC; KP Cal, LLC; Kaiser Hospital Asset Management, Inc.; Kaiser Permanente Insurance Company; Kaiser Health Alternatives; Kaiser Permanente Ventures, LLC; HAMI - Colorado, LLC; Lokahi Assurance, LTD; 1800 Harrison Foundation; Rainbow Dialysis, LLC.; Colorado Permanente Medical Group, P.C.; Hawaii Permanente Medical Group, Inc.; Mid-Atlantic Permanente Medical Group, P.C.; Northwest Permanente, P.C., Physicians and Surgeons; Permanente Dental Associates, P.C.; Ohio Permanente Medical Group, Inc.; Southern California Permanente Medical Group; The Permanente Medical Group, Inc.; The Southeast Permanente Medical Group, Inc.; The Permanente Federation LLC; and Permanente Advantage, LLC. Kaiser Permanente is a registered tradename.

**Kaiser Permanente HealthConnect® and KP HealthConnect** Kaiser Permanente’s electronic health information system.

**Management** Includes senior leaders (such as senior vice presidents, regional presidents, vice presidents, executive medical directors, associate and assistant medical directors, physicians-in-chief, area medical directors, etc.), middle managers (such as directors, department administrators, and chiefs), frontline supervisors (such as nurse supervisors and project managers), and any other position with direct reports.

**Member of the same household** See *Relative* and *Personal relationship*.

**Modest gift** Items valued at less than \$25 per person. See *Cash-equivalent gifts and Gifts*.

**Offensive** Includes products containing tobacco products, weapons of any kind, or anything depicting nudity or deemed as lewd, vulgar, or in any way unpleasant.

**Personal relationship** Includes, but is not limited to, a dating/sexual relationship, engagement for marriage or domestic partnership, or a business relationship, such as joint-ownership in an off-duty business venture.

**Physicians and employees** This includes:

- Physicians associated with the *Permanente Medical Groups*
- Full-time, part-time, and contingent employees (including *management*) of Kaiser Foundation Health Plan, Inc., and its subsidiaries; Kaiser Foundation Hospitals and its subsidiaries; the Permanente Medical Groups, The Permanente Federation LLC, and Permanente Advantage, LLC.

**PMG** Permanente Medical Group.

**Regular basis** Occurs more than four times per year or more than once per quarter.

**Relative** A member of the immediate family of a *physician or employee*, or a member of the immediate family of a physician or employee's spouse or domestic partner, including but not limited to:

- Spouse/domestic partner
- Parent/step parent/parent in-law/step parent in-law/*in loco parentis*
- Child/step child/legal ward/foster child/adopted child
- Daughter/step daughter/daughter in-law/step daughter in-law
- Son/step son/son in-law/step son in-law
- Sister/step sister/sister in-law/step sister in-law
- Brother/step brother/brother in-law/step brother in-law
- Grandparent/step grandparent
- Grandchild/step grandchild
- Aunt/uncle/nephew/niece/first cousin
- Any other person living in the *physician or employee's* household

**Research Sponsor** An entity that provides funding for a research study or an investigational product that is being tested in a study. Examples of research sponsors are individuals, pharmaceutical companies, device manufacturers, foundations, academic institutions, or governmental agencies. Research sponsor also includes the manufacturer of any product being evaluated in the research study. *Kaiser Permanente* entities are not research sponsors.

**Services** Are either complimentary or routine in nature and are not related to health care services. These include, but are not limited to, valet parking for members or patients, transportation for members or patients, and coffee carts.

**Signing authority** *Employees and physicians* who have the authority to sign contracts, authorize payments, and/or have any decision-making authority over the selection of *vendor* products or services.

**Senior-level approval** Includes regional presidents, medical directors, physicians-in-chief, area medical directors, and higher level positions that can authorize action. Appropriate levels are clearly defined in applicable policies.

**Social media and social networking** A set of public technologies and channels used to form a community of participants and enable that community to collaborate. Examples include Facebook, MySpace, Twitter, Yammer, LinkedIn, Yelp, and others.

**Stocks** Any outstanding shares of a company.

**Vendor** Includes any individual or organization that offers, supplies, or sells products or services to *Kaiser Permanente*, including *independent contractors* such as consultants.



## Preserve the Trust of Our Members, Patients, and Customers

### 2. Respect Confidentiality, Privacy, and Security

Much of the information we collect from patients — including medical condition, history, medications, and family illnesses — is very sensitive and protected under privacy and information security laws. In addition, we must abide by any business associate agreements that we have with self-funded health plans, which further restrict our access to and use of protected health information (PHI).

Keeping data confidential, private, and secure is essential to:

- Preserving the trust of our members and patients
- Providing quality health care
- Complying with federal and state regulations and **Kaiser Permanente** policies

#### Consider This...

*My co-worker Abraham has missed a lot of work lately and, quite frankly, he doesn't look so well. I'm worried that he is sick and I want to be there for him. Even though I'm not officially caring for him, is it ok for me to check his medical record to see how he's doing in case there's any way I can help?*

No. It's great that you want to help your colleague, but it's against the law for you to look at a medical record unless you are authorized in writing to do so, or need access to the information to do your job.

All members and patients — including your family, coworkers, and public figures — have a right to privacy.

Looking up medical records without a business need to know is against the law, so play it safe and don't look. Kaiser Permanente regularly checks electronic logs of what data has been accessed. **Physicians and employees** who have accessed medical records inappropriately have been identified and disciplined — some have even lost their jobs.

If you access medical records inappropriately, both you and our organization could face government penalties and fines. Unauthorized access endangers the trust our members and patients have in Kaiser Permanente and our good standing in the community.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your **chief** or **immediate supervisor**. If you would like more guidance on this topic, speak with your privacy and security officer or compliance officer.

Without fail, physicians and employees are expected to follow the requirements of the Health Insurance Portability and Accountability Act (HIPAA), other laws, and Kaiser Permanente's policies on confidentiality, privacy, and security. Failing to do so may result in:

- Disciplinary action
- Termination of employment
- Criminal prosecution by the Office for Civil Rights, state attorneys general, or U.S. attorneys
- Prison time
- Sanctions
- Disclosure to and/or discipline by your applicable licensing board(s)
- Personal fines

Physicians and employees should always:

- Access the minimum amount of information necessary to do your job, whether you are performing administrative and/or business duties or providing care.
- Use confidential information appropriately, including:
  - Access confidential information or PHI only with proper security authorization.
  - Use the minimum PHI necessary to do your job.
  - Follow all laws and policies and procedures that apply to your job if there is a business need to access the PHI of a family member, friend, or third party (such as a co-worker), or your own medical record.
- Discuss patient information:
  - Only when it is required for your job.
  - Only when federal and state laws permit you to do so.
- Keep **electronic devices** password protected and secure.
- Make sure doors to restricted areas where sensitive information is kept are locked.
- Retrieve printouts containing PHI promptly from shared fax machines and printers.
- Use a privacy screen on your computer monitor if the screen is visible and readable by others.
- Log off of a shared computer or lock your computer before walking away from it so others cannot use it with your user identification.

- Restrict access by **vendors** to PHI unless an appropriate process has been followed (for example, completing a business associate agreement).

Physicians should refer to the applicable Permanente Medical Group (**PMG**) policy.

### Consider This...

*We mail printouts of patients' lab results and sometimes the pages get stuck together, so someone else's results end up getting mailed to a member. We can just ask the member to throw away the results that don't belong to them, right?*

Wrong. Improperly revealing PHI without authorization from a member or patient is a serious violation of that person's privacy, even if it's accidental. If this happens, there are several notifications that must take place to ensure the member is informed and the situation is resolved. Also, papers containing PHI need to be disposed of properly through shredding or another destruction method. Don't ever throw papers with PHI in ordinary trash receptacles.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your chief or immediate supervisor on how to handle PHI appropriately.

## 2.1 Store Confidential Information Correctly

You should store confidential information such as PHI on **Kaiser Permanente's** secured network servers rather than on **electronic devices**.

**Senior-level approval** is required ahead of time if you have an essential business need to store confidential patient information on any desktop computer or portable electronic device.

When you get approval to store data on an electronic device, the data must be encrypted and other special physical and security steps, such as password-protecting the device, must be taken to protect against the information being misused if the device is lost or stolen.

### Did You Know...

*Data saved on a computer or laptop's desktop or C drive doesn't get backed up.*

Data could get lost if there are technical problems with the device because it's stored on the device itself and not on our servers, which are secured and backed up regularly. It's just like storing data on an external device, like a thumb drive or CD, that isn't connected to our servers.

Check with your IT department to make sure you're saving data correctly on network servers.





### 3. Focus Resources on Member and Patient Care

#### 3.1 Detect and Prevent Fraud, Waste, and Abuse

Kaiser Permanente's fraud control program protects our members and patients and preserves our resources to reduce costs and help us provide affordable health care. This is part of our mission and values and requires the involvement, commitment, and participation of every **physician and employee**. Many of our activities at work are monitored to prevent and detect fraud, waste, and abuse.

##### Legally Speaking...

Fraud is a deception or misrepresentation made intentionally or with reckless disregard of the truth, knowing that the deception could result in some unauthorized benefit to the perpetrator, another individual, or an entity.

**Examples** Embezzlement, false claims, kickbacks, bribery, false financial reporting, software piracy, credit card fraud, expense account fraud, identity theft, check fraud, false Workers Compensation claims, fraudulent **vendor** billing, member fraud, mail fraud, and falsifying timecards.

##### Find Out More

Learn more about Kaiser Permanente's fraud control program at [kp.org/compliance](https://kp.org/compliance) > **Employees & Physicians > Compliance Programs > Compliance Programs > Fraud Control.**

## 3.2 Follow Anti-Fraud Laws

**Physicians and employees** must never participate in fraudulent activity at work. We must preserve our resources to provide the most affordable health care for our members and patients. If you are aware of any fraudulent activity, you must report it to your **chief** or **immediate supervisor, compliance officer**, internal audit services, controller, human resources representative or the Compliance Hotline at 1-888-774-9100.

See Section 5.1 Safeguard and Use Our Assets and Information Properly for more on fraud, waste, and abuse prevention.

See Section 8.5.4 Patient Referrals, 8.5.5 Follow Anti-Kickback Laws, and 8.6.2 Purchase and Contract Fairly for more on avoiding fraud.

Physicians and employees must document and code (where applicable) patient care provided in an accurate, complete, and timely manner. Claims and supporting medical record documentation must comply with all applicable coding requirements. This documentation is the basis for regulatory reporting and many other activities, including billing, quality reporting, and financial forecasting, so it is very important that it is accurate.

In the health care industry, government definitions of fraud include certain acts that are not intentional. For example, if we submit a claim with a mistake to the Centers for Medicare and Medicaid Services (CMS), it could be considered fraud, even if the mistake is accidental.





## 4. Support Community Involvement

**Kaiser Permanente** believes that by serving our communities' interests and overall social goals, we can help to improve the health of everyone, especially those who are most vulnerable in our communities. We believe everyone should have access to high-quality health care, regardless of their ability to pay.

Kaiser Permanente has always taken a leadership role in our communities — creating and sponsoring programs as well as supporting **physician and employee** volunteerism. We recognize our ability to influence change nationally and locally, and we believe in being visible and active participants in the communities where we live and work.

**Find Out More:** You can learn more about Kaiser Permanente's Community Benefit Program at [kp.org/communitybenefit](https://kp.org/communitybenefit), or volunteer opportunities at [kp.cares/org](https://kp.cares/org).

### Consider This...

*I'm active in my church's Single Parent Support Group. We are filling backpacks for kids getting ready to go back to school and need some supplies. I've seen sunscreen and water bottles given out at health fairs and I think our kids would really love these. Can I get some for our kids?*

All requests for contributions must be directed to the Community Benefit/Community Relations department for review and approval. Each region has community benefit goals and funding guidelines to address community needs. While Kaiser Permanente is committed to providing support to the community, unfortunately we may not be able to fulfill every request.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your **chief** or **immediate supervisor**.

## 4.1 Disclose When Serving on Boards

Many of our **physicians and employees** share their professional expertise in a personal way by volunteering to serve on a **board of directors** or on an advisory board for community-based organizations.

Unless your job responsibilities require that you serve on a community board or committee as a **Kaiser Permanente** representative, you must make it clear that your involvement with an organization is as an individual, and that you do not necessarily represent Kaiser Permanente's interests or perspectives.

You must disclose in writing your involvement with community organizations to your **chief** or **immediate supervisor**, if:

- These activities conflict with the work or mission of Kaiser Permanente or with your individual job responsibilities.
- The position is connected with an official city, county, state, or federal commission, board, or committee.
- The organization is requesting a contribution in cash, goods, or services from Kaiser Permanente.





## 5. Protect Our Assets and Information

### 5.1 Safeguard and Use Our Assets and Information Properly

**Kaiser Permanente's assets** are to be used for Kaiser Permanente health care and business purposes only. They must be handled with care and protected against all forms of misuse, waste, damage, and loss. Do not use Kaiser Permanente assets for personal gain or benefit, or dispose of assets outside of authorized practices regardless of condition or value. Consult with Community Benefit/Community Relations if you would like to give away Kaiser Permanente assets.

**Physicians and employees** must protect Kaiser Permanente's assets. If you are aware of any fraudulent activity, you must report it to your **chief or immediate supervisor**, compliance officer, internal audit services, controller, or human resources representative.

#### Consider This...

*In the past few years I've seen some of our regular patients struggle financially because they've had their work hours reduced or a family member has lost a job. A few of them have asked me if I can waive the registration co-pay. I feel so bad because I don't want to be responsible for a member not coming in for an appointment because they can't afford to, but I'm quite sure I can't do this. What should I do or say?*

While co-pays cannot be waived (except in accordance with policy), members and patients cannot be denied services for not having their co-pay. If members or patients cannot make their co-pay when they receive services, they will be billed after the service or other arrangements will be made.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your chief or immediate supervisor on where to direct members and patients for financial assistance.

### 5.1.1 Use Information Systems Appropriately

Kaiser Permanente's information systems include **KP HealthConnect**, e-mail, voicemail, instant messaging, the Kaiser Permanente intranet, and access to the Internet over the Kaiser Permanente network. These **assets** are tools for **physicians and employees** to use in providing care to Kaiser Permanente members and patients and to conduct Kaiser Permanente business. All communications, including electronic communications on hand-held devices, must be conducted in a professional, respectful, and lawful manner that is appropriate in a business environment.

#### Find Out More

See Section 2. Respect Confidentiality, Privacy, and Security to learn more about accessing information systems appropriately and the safeguards in place to protect patients and their health information.

Kaiser Permanente information systems should never be used to engage in activities that are illegal or illicit, that violate Kaiser Permanente policies, or that could damage our reputation or result in liability for Kaiser Permanente.

The following activities are not allowed when using e-mail, the intranet, or the Internet on Kaiser Permanente computers:

- Sending mass e-mails asking co-workers to support personal or professional causes
- Gambling
- Bidding on/purchasing items other than for Kaiser Permanente use (using eBay, craigslist, and so forth)
- Viewing pornography or any other offensive, discriminatory, derogatory, or exploitative content
- Downloading and/or running external software not approved by Kaiser Permanente IT
- Downloading music and videos for personal use
- Accessing Twitter, Facebook, MySpace, and other **social networking** sites for personal purposes

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as your area's policies and procedures for social media, and check with your **chief** or **immediate supervisor** on using information systems and making representations about Kaiser Permanente in any external, public communications forums appropriately. If you would like more guidance on this topic, talk to your public affairs or communications office or your compliance officer.

### Consider This

*My co-worker collects rare silver coins. In between seeing patients, I often see him using his computer to bid on online auctions. Is this OK?*

No. Kaiser Permanente information systems, including computers, are tools for work. While it's understandable that you may need to handle some personal matters during work from time to time, such as scheduling appointments or following up with teachers and so forth, participating in online auctions during work hours is not permitted.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your **chief** or **immediate supervisor** on using information systems.

Also, you should know that when you use Kaiser Permanente information systems, all data and communications — including e-mail and voicemail messages — become the property of Kaiser Permanente and can be monitored and reviewed. While Kaiser Permanente respects the privacy of physicians and employees, it is legal for Kaiser Permanente to monitor your e-mail and Internet usage (including the frequency and duration of visits to specific websites) and your access to information systems and tools — without your consent or prior notice.

#### 5.1.2 Safeguard Confidential Information

Confidential information, such as **Kaiser Permanente's** financial data and reports, strategies, initiatives, and similar material, should not be shared with anyone outside the organization unless you have received approval to disclose it from someone who is a decision maker for that confidential information.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your **chief** or **immediate supervisor** about what is considered confidential.

#### 5.1.3 Protect Intellectual Property and Research

Intellectual property includes ideas, strategies, patents, copyrights, inventions, and trademarked programs (for example, **KP HealthConnect**). These **assets** help to keep **Kaiser Permanente** competitive and contribute to the body of knowledge that advances health care. All research and intellectual property generated in the course of employment at Kaiser Permanente are the property of Kaiser Permanente.

If you suspect that any intellectual property has been disclosed inappropriately, stolen, or lost, you should report it right away to your **chief**, or **immediate supervisor**, human resources representative, compliance officer, or the Compliance Hotline at 1-888-774-9100.

### 5.1.4 Use Funds Appropriately

**Kaiser Permanente** funds, which include anything that has or represents financial value, must be handled responsibly, honestly, and in strict compliance with Kaiser Permanente policies. Corporate credit cards must be used only for authorized business purposes and cannot be used for personal charges.

### 5.1.5 Keep Track of Assets

**Chiefs** and **immediate supervisors** have a responsibility to keep track of the **assets** issued to **physicians and employees** in their unit or department. **Kaiser Permanente** assets should be returned when a physician or employee is promoted, is transferred, or leaves Kaiser Permanente.

Chiefs and immediate supervisors should have a current list of all assets held by physicians and employees and should review this list to ensure that it remains current.

### 5.1.6 Entering Kaiser Permanente Facilities

To protect the safety and security of our members, patients, **physicians and employees**, and **Kaiser Permanente assets**:

- Wear your identification at all times.
- If you see people without identification, offer to assist them in getting to their destination.
- If you see people without proper identification or without an escort in a restricted area:
  - Offer to escort them to an appropriate area.
  - Get an authorized person to assist them.
  - Report them to security.
- Do not provide unauthorized people with access to Kaiser Permanente facilities.
- Access Kaiser Permanente facilities yourself only for legitimate business purposes during the hours that you are authorized to do so.

## 5.2 Maintain Accurate Business Records

It is important to maintain accurate business records, including providing the purpose of a business meal and individuals in attendance in expense reports, reporting financial and statistical information to third parties, filling in timesheets, and so forth.

**Physicians and employees** who provide data or information they know or suspect is false are subject to discipline, up to and including termination of employment.



### Consider This...

*Because we do everything electronically on **KP HealthConnect** now, we don't need to keep all these paper charts or medical records anymore, right?*

Wrong. Those paper charts and medical records contain years of valuable information about our patients. While KP HealthConnect helps **Kaiser Permanente** care for our members and patients more effectively and efficiently, we need to maintain certain paper medical records in accordance with laws and other requirements.

#### 5.2.1 Retain and Destroy Company Records According to Policy

**Kaiser Permanente** business records should be retained or destroyed according to federal, state, and local laws and regulations; applicable licensing, accreditation, and contractual requirements; and applicable Kaiser Permanente policy.

Never destroy, change, or conceal any record if you have been instructed to keep it, or if you know or think it's possible the record may be involved in an investigation or litigation.

**Check it out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your **chief** or **immediate supervisor** on how to handle records and PHI appropriately.





## 6. Protect Our Reputation

### 6.1 Market and Communicate About Kaiser Permanente Accurately and Strategically

Federal and state laws protect the public from marketing that is deceptive and dishonest. Determining how, where, and to whom we advertise **Kaiser Permanente** products and services involves strategy, creativity, and consistency. It also involves being truthful and accurate.

Only authorized individuals may communicate, either directly or indirectly, to the public on behalf of Kaiser Permanente. Communication includes relaying information in any form, including but not limited to print advertising, publications, flyers, Web-based media, radio, television, press releases, interviews, electronic advertisements, **kaiserpermanente.org** and all other websites owned and/or operated by Kaiser Permanente.

All types of external communications must be reviewed and approved by the appropriate national or regional communications group for your area:

- Brand Marketing
- Marketing Communications
- Brand Strategy, Communications, and Public Relations
- Communications or public affairs staff for your area

Some materials, depending on their content and the audience, may also need to be reviewed by the Kaiser Permanente attorney for your area and your compliance officer to ensure that they have been approved by applicable federal and state agencies.

It is also important that you not photocopy any type of educational materials that have been produced outside of Kaiser Permanente and give them to members or patients without copyright permission from the publisher.

Permanente Medical Group physicians should follow applicable **PMG** policy for these activities.

### Consider This...

*I want to let members know about a new support group we are offering at our medical center. I could easily make a flyer and post it in our waiting area, but I'm told that we need to go through public affairs or marketing. Why all the bureaucracy?*

We want to make sure that we communicate with our members and patients consistently, in both written and oral communications. Kaiser Permanente has invested a great deal in building and promoting our brand, and we want to make sure that all external communications are consistent with our brand, whether we are communicating with our members or patients through a flyer or an appointment reminder.

## 6.2 Know What to Say When Speaking Externally

Whenever employees interact with the media, participate in social media, talk about **Kaiser Permanente**, participate in external conferences and presentations and share any information about Kaiser Permanente, you must get approval from your **immediate supervisor** and your public affairs or external communications staff to ensure that we comply with all laws and regulations governing the release of information and to correctly promote our brand and protect our reputation.

These interactions include, but are not limited to, contacts with reporters, writers, bloggers, videographers, and members or non-members participating in **social networking** sites or devices. This also includes any public speaking about our organization, for example, speaking to an outside group such as your local Rotary Club or your daughter's school on career day.

If you receive any request for an interview, speaking engagement, or social media interaction, or if you determine that you want to engage in a **social media** conversation that mentions Kaiser Permanente, you should discuss it with your **immediate supervisor** and your public affairs or external communications staff.

Permanente Medical Group physicians should follow applicable **PMG** policy when speaking externally.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures, for your area, and check with your **chief** and immediate supervisor on social media and communicating outside of Kaiser Permanente.



## Help Make Kaiser Permanente a Best Place to Work

### 7. Treat One Another with Dignity and Respect

We believe that all our **physicians and employees** have a right to receive fair and just treatment and that we all have the responsibility to treat one another respectfully. This extends to our relationships with members, patients, **customers, vendors**, the community, and anyone who comes into contact with **Kaiser Permanente**.

#### 7.1 Value Workforce Diversity

**Kaiser Permanente** has long been known for its leadership in workplace diversity. The diverse ideas and backgrounds we bring to the workplace strengthen Kaiser Permanente, and create a workplace environment in which everyone can thrive.

Kaiser Permanente is committed to promoting and maintaining an inclusive, high-performing culture in which everyone celebrates innovative thinking, and makes full use of each others' talents, experience, and backgrounds.

If you believe that you or any other Kaiser Permanente **physician or employee** has been subject to discriminatory conduct, you should report it promptly to your **chief, immediate supervisor**, or human resources representative. You may also use the Equal Employment Opportunity Internal Complaint Procedure or the Compliance Hotline at 1-888-774-9100. Chiefs and immediate supervisors must report allegations of discrimination to human resources right away regardless of who is engaged in the alleged misconduct.

### 7.1.1 Respect Member and Patient Diversity

**Kaiser Permanente** has the privilege of serving a diverse population. This privilege comes with the responsibility of considering and respecting members' and patients' cultural needs and values when we care for them or have contact with them and their families.

Our goal is to deliver unbiased, culturally appropriate health care that incorporates the diversity of health beliefs, practices, and communication preferences of our very diverse membership. Kaiser Permanente does not discriminate against patients on the basis of sex, age, economic status, educational background, race, color, religion, ancestry, national origin, sexual orientation, gender identity, marital status or source of payment.

#### Consider This...

*I get frustrated and irritated when I work with members or patients whose family and friends speak in another language. Is it OK for me to ask members or patients to speak in English?*

No. Our members and patients have the option of speaking in their preferred language. If needed, offer interpretive services to ensure that you and the member or patient understand one another.

It's important to remember that the health care setting can be stressful. When members and patients speak in their preferred language, they may be able to communicate the care or help they need more clearly than if they were required to speak in English.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your **chief or immediate supervisor** on respect and fair treatment for members and patients. If you would like more guidance on this topic, talk to your diversity or linguistic services department.

## 7.2 Foster a Harassment-Free Environment

We do not tolerate harassment of any kind by anyone in violation of **Kaiser Permanente** policies, whether it involves an **employee, physician, executive, vendor, contractor, member, patient, or anyone else**. We believe in personal dignity and respect for one another. Whether or not an offense was intended, harassment — or the perception that it exists or has occurred — is harmful and creates a less effective work environment.

Harassment takes many forms. A few examples include:

- Jokes, insults, threats, and inappropriate comments about a person's race, color, sex, gender identity, age, religion, national origin, ancestry, citizenship, physical or mental disability, veteran status, sexual orientation, genetic information, or other status protected by applicable federal, state, or local laws
- Unwelcome sexual advances, sexual remarks, displays of offensive material, requests for sexual favors, and other unwelcome verbal or physical conduct of a sexual nature
- Verbal, physical, or visual conduct that disrupts another's work performance or creates an intimidating, harassing, or hostile work environment
- Communicating or displaying offensive material in the workplace

If you are the victim of workplace harassment, or see or hear it taking place, you should report it immediately to your **chief, immediate supervisor, human resources representative, or compliance officer**. You can also call the Compliance Hotline at 1-888-774-9100.

### Consider This...

*Two of my co-workers are constantly engaging in very obvious flirtatious behavior. While I think this is more talk than action, it makes many of us uncomfortable. Our supervisor just laughs about it and says it's "harmless." What should we do?*

Report it. These two employees are creating an uncomfortable work environment that could be impacting your team's effectiveness. Raise the concern with your human resources representative or your compliance officer.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your chief or immediate supervisor on fostering a harassment-free environment. If you would like more guidance on this topic, talk to your human resources representative or compliance officer.

## 7.3 Make Safety and Environmental Awareness a Priority

We want to keep everyone who steps into a **Kaiser Permanente** facility safe. This includes members, patients, visitors, **physicians, employees, vendors,** and volunteers. We also want to ensure that the way we do business is mindful of short- and long-term environmental impact.

### 7.3.1 Focusing on Workplace Safety

Safety is an important **Kaiser Permanente** value. Kaiser Permanente complies with all laws and regulations that govern workplace health and safety, and our standards often exceed minimum safety requirements.

We all play a role in ensuring workplace safety. Kaiser Permanente's senior leaders are responsible for having the right policies, procedures, systems, tools, equipment, and training in place, and for addressing unsafe conditions or security issues promptly. It is everyone's responsibility to work safely and to report any unsafe conditions or security-related issues immediately. We must all work together to create a safe, secure, and injury-free workplace.

You are required to:

- Participate in safety training programs.
- Follow safety standards and incorporate them into workflows and performance improvement projects.
- Report safety concerns as they arise to your **chief, immediate supervisor,** or safety manager.
- Share and discuss ideas about improving safety with your co-workers and your chief or immediate supervisor.
- Familiarize yourself with safety resources, including getting to know your safety manager.
- Contact a security office or law enforcement personnel, as appropriate, when a crime is in progress and/or an individual's life could be in jeopardy.

### 7.3.2 Reporting Work-Related Injuries

**Kaiser Permanente** is required to record and report work-related injuries. While we want to have zero occurrences of work-related injuries, they do occur, and it is critical that these accidents and incidents are reported. Laws require us to record and report these incidents, and doing so helps Kaiser Permanente put better mechanisms, processes, and practices in place to avoid them in the future.

If you are involved in an incident, you must report it promptly to your **chief** or **immediate supervisor** and follow the necessary procedures.

#### Consider This...

*I work in the chart room, and I like to do my work while listening to music. I put on some good tunes, stick my ear buds in, and I'm good to go! My supervisor makes me take the headphones out. Why?*

Having headphones in your ears interferes with your ability to hear others. This may pose a danger while you are moving around the chart room, walking down hallways, etc. Rules specific to a department are often implemented to avoid injuries.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your chief or immediate supervisor on making safety a priority at work. If you would like more guidance on this topic for your department, talk to your safety manager or compliance officer.

### 7.3.3 Cooperating With Periodic Federal and State Inspections

From time to time, federal and state agencies may make unannounced visits to our facilities to conduct inspections. **Physicians and employees** must cooperate with these officials and contact a **chief, immediate supervisor**, compliance officer, and/or safety manager to assist with the inspection right away.

### 7.3.4 Minimizing Our Environmental Footprint

**Kaiser Permanente** is dedicated to environmental sustainability because a healthy environment has a direct and positive impact on both individual and community health. Kaiser Permanente **physicians and employees** should reduce Kaiser Permanente's environmental impact by reducing waste (for example, using less paper), participating in recycling programs, conserving energy and water, and using renewable resources whenever possible. If you have suggestions on ways that we could provide care or do business in a more environmentally sustainable manner, share them with your **chief, immediate supervisor**, facility green team member, or safety manager.

### 7.3.5 Reporting Environmental Hazards

If you know or suspect that an environmental hazard has occurred, you must notify your **chief** or **immediate supervisor** or safety manager as soon as possible. Improperly disposing of hazardous materials can have negative effects on people and the environment. It could also result in **Kaiser Permanente** facing regulatory and criminal charges and penalties.





## 7.4 Know the Facts About Retaliation

**Kaiser Permanente** prohibits retaliation of any kind against individuals who in good faith report or participate in the investigation of any complaint. This includes retaliation between peers, **immediate supervisors** and employees, **physicians and employees, vendors** and employees, and so forth.

If you believe you or others are being retaliated against in any way for reporting or participating in the investigation of suspected illegal, unethical, or otherwise inappropriate acts, you must immediately refer the matter to your compliance officer or call the Compliance Hotline at 1-888-774-9100.

Kaiser Permanente is committed to creating a work place where physicians and employees are protected from retaliation when you speak up and make a good faith report of inappropriate or suspicious activities or when you refuse to participate in wrongdoing.

All Kaiser Permanente physicians and employees are covered by the whistleblower protections in the Federal False Claims Act and other federal and state whistleblower laws and regulations.

The Federal False Claims Act is intended to reduce fraud, waste, and abuse of federal funds by allowing private parties to bring suit on behalf of the government against people or businesses alleged to have committed fraud. The act also protects whistleblower physicians and employees from retaliation by employers.

### Consider This...

*In comparing patient visits and the claims submitted over the past few months, I think the way my manager is filing Medicare reimbursement claims is not correct. I'm scared to say anything about it because my manager could get into a lot of trouble and, I think, so could I. What should I do?*

You should discuss your concerns with your compliance officer, speak with the Kaiser Permanente attorney for your area, or call the Kaiser Permanente Compliance Hotline at 1-888-774-9100. The Federal False Claims Act and other federal and state whistleblower laws protect you. Kaiser Permanente will not discharge, demote, suspend, threaten, harass, or in any manner discriminate against physicians and employees in retaliation for exercising their rights under these laws.



## Make Objective and Fair Decisions

### 8. Avoid Conflicts of Interest

**Kaiser Permanente's** distinguished reputation as an innovator and health care pioneer has been earned through the efforts of **physicians and employees** over more than six decades. Maintaining and protecting that reputation depends directly on our actions and the integrity with which we conduct our work.

Workplace decisions must be made objectively and fairly. If you have a **conflict of interest**, or other persons reasonably could believe that you have a conflict of interest, the objectivity and fairness of your decisions could be questioned by your colleagues, coworkers, or even the federal and state government. In fact, many federal and state government agencies now have specific rules on conflicts of interest and we must comply with them.

If you think that you or a coworker might have a conflict of interest, talk with your **chief, immediate supervisor**, or compliance officer. These situations are often not clear cut and they will be reviewed by experts on a case-by-case basis.

## 8.1 Understanding How Conflicts of Interest Occur

**Conflicts of interest** occur any time your personal interests or **personal relationships** might impair, or might reasonably appear to impair, your ability to make an objective and fair decision based solely on what is best for **Kaiser Permanente** and the members and patients we serve.

Actual or perceived conflicts of interest arise from many different kinds of relationships. The relationships addressed in the *Principles of Responsibility* are **vendor** relationships, employment relationships, and financial relationships. There are countless other kinds of relationships that you might have as a **Kaiser Permanente physician** or **employee** that could generate an actual or perceived conflict of interest. Read the Kaiser Permanente policies that apply to you to check for other kinds of conflicts to avoid.

Our business model is a complicated one. Many parts of Kaiser Permanente are focused on the administrative aspects of running a health plan, while others are involved in providing actual health care in the medical office and hospital settings. We also contract with outside provider organizations.

The list of people and organizations we have relationships with is long and varied. Some of them include:

- Members, patients, and customers
- Business partners, including vendors, consultants, and unions
- Universities and training programs
- Benefit consultants and brokers
- Federal, state, city, and county governments
- Community-based organizations, volunteers, and foundations
- The general public

Many of these relationships are bound by a legal contract; others are not. The complexity of all these relationships can contribute to situations in which conflicts of interest may occur. This is especially true if roles, responsibilities, and accountabilities are not clear. When your role at Kaiser Permanente involves such interactions, you need to ensure that potential conflicts are managed appropriately.

## 8.2 How to Handle Conflicts of Interest

When potential **conflicts of interest** are not handled correctly, they can put both you and **Kaiser Permanente** at risk of fines, litigation, penalties, criticism from patients, interest groups, or government agencies, and negative media coverage. Investigating and resolving conflicts of interest can be costly. It takes time, money, and effort. These resources should be spent taking care of our members and patients and improving our quality of care.

### 8.2.1 Getting Help on Conflicts of Interest

To help manage **conflicts of interest**, **Kaiser Permanente** has developed the following guidance.

You should also be aware that some Kaiser Permanente employers and departments have more stringent conflicts of interest policies. For example, Kaiser Permanente **physicians and employees** who have direct decision-making authority over the pharmaceuticals that Kaiser Permanente buys are not allowed to accept anything of value from any pharmaceutical **vendor**. In addition, some of the **PMGs** have adopted policies that prohibit any PMG physician or employee from accepting anything of value from a Kaiser Permanente vendor.

Check to make sure you know which conflicts of interest policies apply to you. There may be more than one policy that applies to you, and you are required to comply with the strictest one. For example, a physician with the Southern California Permanente Medical Group (SCPMG) who is also a member of the Kaiser Permanente National Products Council (NPC) is subject to the SCPMG conflicts of interest policy and the NPC conflicts of interest policy. Since the NPC policy is stricter, the provisions of the NPC policy apply to that physician.

### 8.2.2 Conflicts of Interest Questionnaire

As a **physician or employee**, you may be asked to complete a **conflicts of interest questionnaire**. If so, you must answer honestly, completely, and in a timely manner. Not doing so could lead to disciplinary action up to and including termination of your employment.

The conflicts of interest questionnaire is not the only way for you to communicate a potential issue. Even if you are not asked, you must tell your **chief, immediate supervisor**, or compliance officer of any actual or potential conflict.

## 8.3 How to Handle Gifts and Business Courtesies

Creating and maintaining strong relationships with our members and patients, **business partners**, and **customers** is vital to our success. However, if you accept gifts from individuals or organizations that sell or offer to sell goods and services to **Kaiser Permanente**, you allow others to raise at least the possibility that your decision to do business with that **vendor** or prospective vendor was not made objectively or fairly and in the best interest of Kaiser Permanente.

### 8.3.1 Accepting Gifts from Vendors

Some Kaiser Permanente entities, such as The Permanente Medical Group, Inc., do not permit their physicians or employees to accept gifts from **Kaiser Permanente vendors**. Other Kaiser Permanente entities follow the rules that are included in the *Principles of Responsibility*.

In addition, Kaiser Permanente **physicians and employees** who have the authority to sign Kaiser Permanente contracts, authorize payment of Kaiser Permanente funds to vendors, or have decision-making authority over the selection of products or services purchased by Kaiser Permanente must not accept any gifts from a Kaiser Permanente vendor or prospective vendor.

If you do not have **signing authority**, you may be able to accept gifts from Kaiser Permanente vendors only if the following criteria are met and the policies that apply to you allow you to do so:

- The gifts do not violate any law or policy (See Section 8.3.3 Gifts You Cannot Accept).
- The gifts cannot reasonably be seen as an attempt to gain an advantage or be considered a bribe, payoff, or insider deal.
- The gift cannot be more than \$25 per person per incident and is not given on a **regular basis**. (This includes meals.) Check your regional or local policy because some areas have adopted a \$0 limit.

Although in some cases, limited exceptions or waivers may be granted, if you are invited to a business-related dinner or event that is paid for by a vendor and exceeds the \$25 per person limit, then you must obtain your **chief's** or **immediate supervisor's** permission to attend. If the value that you receive at the dinner or event unexpectedly exceeds the \$25 maximum, then you must disclose it to your chief or immediate supervisor as soon as possible.

Remember, you are responsible for knowing which policies apply to you, and complying with the strictest one. Some regions, Permanente Medical Groups, medical centers, and departments have stricter policies that you must follow. If you would like more guidance on this topic, talk with your compliance officer.

### Consider This...

*Alisa works in a Kaiser Permanente region that allows her to accept gifts worth less than \$25. She attends a product training at a vendor's office. Is it OK for her to:*

- *Have a bagel and cream cheese that is provided during a break?*
- *Be taken out for dinner at a restaurant after the session?*

If the food does not exceed \$25 in value, it is acceptable: a bagel is fine, but a four-course meal at a steak house probably wouldn't be.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your chief or immediate supervisor.

### 8.3.2 Accepting Gifts from Grateful Members and Patients

Sometimes members and patients want to express their appreciation for the care they received by giving a **Kaiser Permanente physician or employee** a gift. You can accept reasonable gifts from grateful patients. Perishable items, such as food or flowers that cannot be returned, can be accepted and shared with others.

### 8.3.3 Gifts You Cannot Accept

As a **Kaiser Permanente physician or employee**, accepting some gifts is prohibited, including:

- Accepting a tip for a complimentary or routine service
- Receiving gifts or **entertainments** on a **regular basis**
- Receiving cash or cash-equivalent gifts (for example, checks, gift certificates or cards, coupons, and the like)
- Receiving gifts of more than a **modest gift** value (Note: If you receive a more than modest gift from a patient, speak with your **chief** or **immediate supervisor**.) (Note: If your Kaiser Permanente employer does not allow gifts of any value, you cannot accept any gifts, including modest ones.)
- Receiving weapons of any kind
- Receiving tobacco of any kind
- Receiving items that reasonably might be viewed as lewd, vulgar, pornographic, or offensive

Prohibited gifts must be refused, returned immediately to the sender, or donated appropriately.

**Check It Out:** If a situation comes up that falls outside of the above criteria, talk to your chief or immediate supervisor or compliance officer and see Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area.

Some regions, medical groups, medical centers, departments, and job functions have stricter policies on accepting gifts that you must follow.

In cases where Kaiser Permanente is an event sponsor, speak with your compliance officer and public affairs or communications department in your area about how to handle tickets.

### 8.3.4 Giving Gifts Using Kaiser Permanente Resources

There may be occasions when you want to show a **vendor**, customer, or government official your appreciation for exceptional work by offering a gift, meal, entertainment, or similar token of appreciation. This is acceptable if:

- It does not violate any law or contractual agreements.
- It cannot be construed as a bribe, payoff, deal, or any other attempt to gain advantage.

- The gift is worth no more than \$25, or the limit established by the policy that applies to your job. For example, marketing and sales departments have more detailed policies on the kinds of gifts that are acceptable.

Just as we have policies about giving and receiving gifts, the recipient may have similar policies as well. Please make a prudent effort to ensure that the gift meets the recipient's gift policy.

See Section 9.3.2 Interacting With Individuals and Organizations Restricted by the Government as well as Section 9.4 Protect Kaiser Permanente During Political Activities and When Making Political Donations for more on gifts, invitations, and donations involving government officials.

## 8.4 Avoid Conflicts of Interest in Personal Relationships

### 8.4.1 Employment of Relatives and Household Members

Employment decisions must always be made based on qualifications and merit.

**Kaiser Permanente** permits **relatives** and **members of the same household** to work together if they are the most qualified candidates. However, the following employment relationships are *not* allowed:

- **Reporting relationships** — A **physician or employee** may not report directly or indirectly to a relative or someone you have a **personal relationship** with unless you disclose it to your **chief** or **immediate supervisor** and get **senior-level approval**. For example, a staff member cannot report to his aunt or to a chief or immediate supervisor who reports to his aunt.
- **Awkward working arrangements** — Relatives or members of the same household working together may create a real or perceived **conflict of interest** or an unethical or inappropriate situation by being a risk to safety, security, operations, or morale. For example, if relatives or members of the same household working together always take the same days off, the resulting pressure for others to cover their time off could affect the department's effectiveness.
- **Employment decisions** — You may not make hiring and/or compensation decisions, including coaching, promoting, or termination of employment for any relatives, members of the same household, or someone with whom you have a personal relationship.
- **Performance feedback** — You may not provide performance feedback for any relatives or members of the same household.

You must give written notice to your chief or immediate supervisor (in your current department or any that you transfer to) of any work situations involving the employment of relatives, members of your household, or someone with whom you have a personal relationship.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your chief or immediate supervisor.

Some regions, Permanente Medical Groups, medical centers, and departments have stricter policies that you must follow. If you would like more guidance on this topic, talk to your compliance officer.

### Consider This...

*The department chief's niece was hired as a receptionist, and other department staff feel she's being favored.*

If the chief has direct oversight of the niece or her immediate supervisor, 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 chief.

*Jeff just learned that his wife, an independent consultant who often contracts with a large firm, just landed a contract to provide training for Kaiser Permanente. Is there anything he needs to do?*

To avoid the appearance of a conflict of interest, Jeff should disclose to his chief or immediate supervisor that his spouse is a contractor to Kaiser Permanente.

**Check It Out:** You should seek guidance from a compliance officer on situations in your department. Each situation should be considered individually.

## 8.4.2 Relatives and Members of the Same Household Who Work for Vendors

Anyone with the authority to direct or influence the use of **Kaiser Permanente assets** must be careful to avoid any potential **conflicts of interest** with **vendors**.

See Section 8.5.7 Outside Directorships for more about serving on the **board of directors** of a vendor.

### Consider This...

*A new vendor just completed a project for my department and gave me a \$50 gift voucher to say "thanks for the business." I know that they received the Vendor Code of Conduct that says that gifts valued at more than \$25 cannot be given or accepted. What should I do?*

Thank the vendor for the work and for the gift, but let the vendor know that you cannot accept the gift voucher because it exceeds the \$25 allowable amount and because gift cards are not acceptable. You may also want to get a copy of the *Vendor Code of Conduct* (go to **kp.org/compliance** and click **Vendors & Contractors**), highlight the section on gifts and business courtesies, and give it to the vendor to explain your actions.



**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your **chief** or **immediate supervisor** on building vendor relationships with integrity. If you would like more guidance on this topic, talk to your human resources representative or compliance officer.

See Section 8.5.1 Outside Employment, Including Self-Employment and Section 8.5.3 Financial Interests and Investments for more if you or a member of your household has financial interests in a **competitor** of Kaiser Permanente.

## 8.5 Keep Our Financial Interests Separate

**Kaiser Permanente physicians and employees** must avoid situations where investments and outside income can influence or appear to influence decisions made on behalf of Kaiser Permanente.

Kaiser Foundation Health Plan, Inc., and Kaiser Foundation Hospitals are nonprofit organizations and their employees must follow rules that protect their tax-exempt status.

### 8.5.1 Outside Employment, Including Self-Employment

Different **Kaiser Permanente entities** have different policies about outside employment and outside income that may be stricter than the policy set forth in this *Principles of Responsibility*. You must comply with the policy of the Kaiser Permanente entity that employs you. Outside employment, including self-employment, by physicians or employees must always be avoided if it interferes or conflicts with Kaiser Permanente's mission, business, or your work. Generally, **physicians and employees** cannot:

- Serve as a member of a **board of directors** or an advisory board of a Kaiser Permanente **vendor**. (See Section 8.5.7 Outside Directorships for more.)
- Be directly involved in the sale of a product or service to Kaiser Permanente while employed by Kaiser Permanente.
- Serve as a member of a board of directors, an advisory board, or as a consultant to a **research sponsor** of a study for which you are a researcher.

You must also give written notice to your **chief** or **immediate supervisor** before working as a consultant, **independent contractor**, representative, or employee of any organization that is a **competitor** of Kaiser Permanente. If an outside organization you are working for becomes a competitor, disclosure is required at that time.

Additionally, special situations may arise where written disclosure to your chief or immediate supervisor is required, such as contracting with a former physician or employee or contracting with an organization that you have worked with in the past. In some cases, exceptions or waivers may be granted.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your chief or immediate supervisor.

Some regions, Permanente Medical Groups, medical centers, and departments have stricter policies that you must follow. If you would like more guidance on this topic, talk to your compliance officer.

If you work for Kaiser Permanente on an on-call or per-diem basis, you are not required to provide a written disclosure for work outside Kaiser Permanente unless it is for a Kaiser Permanente competitor. However, if you are asked to complete a **conflicts of interest questionnaire**, you must respond to all questions accurately, completely, and in a timely manner.

### 8.5.2 Honoraria and Speakers Fees

You cannot accept **honoraria**, speakers fees, or anything else of value from a **vendor** or **research sponsor** in exchange for teaching or giving presentations prepared in the course of work for **Kaiser Permanente** or presenting content related to Kaiser Permanente. This includes, but is not limited to, payment for:

- Time
- Travel expenses
- Meals
- **Entertainment**
- Recreational or social activities

If you are offered an honorarium when giving a presentation as a representative of Kaiser Permanente, you should turn over any honoraria to your Kaiser Permanente employer.

Presentations prepared in your personal time on content that doesn't relate to Kaiser Permanente may be acceptable but must meet the requirements in Section 8.5.1 Outside Employment, Including Self-Employment, and any other policy that applies to you. If you give a presentation or lecture that is not prepared or delivered on work time and is not about Kaiser Permanente, accepting an honorarium from any of the following organizations may be acceptable — again, depending on the policy that applies to you:

- Educational institutions
- Training programs
- Professional associations
- Non-profit organizations
- Government agencies

However, you may be required to disclose and receive approval for acceptance of the honoraria, again depending upon your Kaiser Permanente employer and the policy that applies to your job or function.

### 8.5.3 Financial Interests and Investments

As a **physician** or **employee**, you must tell your **chief, immediate supervisor**, or compliance officer if you or anyone in your immediate family has a **financial interest** in any **vendor**, customer, or **competitor** as soon as you know of the connection. This is especially important to keep in mind if your job duties and responsibilities change over time.

For example, acquiring a financial interest in a piece of real estate may present a conflict if you have confidential information that **Kaiser Permanente** may be considering buying that property. This includes interests in real estate, patent rights, or securities. However mutual fund shares and insubstantial share holdings of a publicly held company do not need to be disclosed.

If you are a researcher, there are specific rules relating to holding investments and other interests in **research sponsors**. Please refer to the appropriate policy or your compliance officer for guidance.

If you have questions about financial interests, investment requirements, or similar situations, ask your chief, immediate supervisor, or compliance officer.

### 8.5.4 Patient Referrals

Federal, state, and/or local laws generally prohibit payment, either directly or indirectly, for referring certain patients for medical services. Specific laws also ban payment for patient referrals to a service provider (for example, laboratory services) where the referring provider or an immediate family member has a **financial interest** in that service provider. **Health care providers** are also prohibited from referring **Kaiser Permanente** members and patients to their own private practice for care. For example, a physician cannot refer a Medicare patient to a laboratory if that physician holds an ownership interest in that lab or receives any type of payment from that lab, unless a legally recognized exception applies.

Consult your **chief, immediate supervisor**, or compliance officer before making such referrals, because patient referral requirements are complex.

See Section 8.3 How to Handle Gifts and Business Courtesies for more on what kinds of gifts are and are not acceptable.

### 8.5.5 Follow Anti-Kickback Laws

Anti-kickback and Stark laws and similar state laws make it illegal for physicians and other **health care providers** to knowingly and willfully accept bribes or other kick-backs in return for generating Medicare, Medicaid, or other federal health care business.

This area of the law is complex. Arrangements that involve payments for things like recommending or ordering a particular drug, types of medical equipment, lab tests, and so forth are strictly prohibited. Keep in mind that there are stiff penalties for violations, including:

- Disciplinary action up to and including termination
- Large monetary penalties
- Exclusion from federal health care programs (for example, Medicare)
- Imprisonment up to five years (in the case of anti-kickback violations)

See Section 8.3 How to Handle Gifts and Business Courtesies for more on what kinds of gifts are and are not acceptable.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your **chief, immediate supervisor**, and legal counsel for your area if you have questions about this area of the law.

### 8.5.6 Physician Income and Investments

Physician partners and shareholders of the Permanente Medical Groups may not invest in or perform services for any organization providing health care services to patients in areas served by **Kaiser Permanente**, except as specifically permitted by **PMG** policy or as otherwise approved in writing by an authorized PMG senior leader. This includes any services that involve or require a medical license or medical expertise.

Income earned by PMG **physicians and employees** for professional services performed outside of your PMG is subject to the policies of your PMG.

### 8.5.7 Outside Directorships

Service on the **board of directors** of a **vendor** or potential vendor generally is not permitted. To serve on the board of a **competitor** requires written disclosure to your **chief, immediate supervisor**, or compliance officer.

See Section 4.1 Disclose When Serving on Boards for more on being involved in other organizations' boards of directors.



## 8.6 Partner With Vendors to Support Our Values

### 8.6.1 Build Vendor and Contractor Relationships with Integrity

Running a successful organization often requires using the professional expertise of others and buying materials and products from third parties. It is critical for **Kaiser Permanente** to build these **vendor** and contractor relationships with integrity to ensure that business dealings between all parties run smoothly and to protect the interests of Kaiser Permanente.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your **chief** or **immediate supervisor**. If you would like more guidance on this topic, speak with your safety manager or compliance officer.

See Section 8.4.2 Relatives and Members of the Same Household Who Work for Vendors.

See Section 8.3 How to Handle Gifts and Business Courtesies for more on what kinds of gifts are and are not acceptable.

### 8.6.2 Purchase and Contract Fairly

**Kaiser Permanente** has negotiated contracts with some **vendors** that enable us to purchase products (such as office supplies) and **services** (such as express mail) that have a consistent quality at a discounted rate. Using only these select vendors helps reduce costs and improve quality.

**Check It Out:** Each region's preferred vendor list varies. Check with your **chief** or **immediate supervisor** for the list you can work with.

### 8.6.3 Avoid Antitrust and Unfair Competition

Antitrust laws prohibit working together with **competitors** to:

- Set prices, terms, or conditions of sale
- Boycott customers or suppliers
- Divide markets by customers, territories, or **services**
- Limit free-market competition in other ways

Ask your **Kaiser Permanente** attorney if you ever question whether a business deal violates antitrust and unfair competition laws.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your **chief** or **immediate supervisor**.

### 8.6.4 Choose Vendors and Independent Contractors Fairly

Only **physicians and employees** who are authorized to enter into binding contracts on behalf of their respective **Kaiser Permanente entity** should attempt to do so. Selecting suppliers and **vendors** must be done fairly and objectively. The following factors should be considered carefully:

- Kaiser Permanente purchasing policies
- The well-being of our members and patients
- The best interests of Kaiser Permanente
- Whether the vendor is likely to provide quality products and/or services as promised
- Affordability

Decisions about what goods and services Kaiser Permanente buys should be made objectively and fairly. No one should use or attempt to use his or her position to advocate for or against a vendor unfairly. The criteria and process used to select a vendor should be documented, and the terms and conditions of the purchase should be defined clearly. Mistakes or misunderstandings can occur if agreements are made orally, over the telephone, or in other informal exchanges.

### 8.6.5 Fair Conduct for Vendors and Independent Contractors

Just as **physicians and employees** are expected to treat our business partners fairly, **vendors** and **independent contractors** are expected to conduct business professionally and to follow **Kaiser Permanente's Vendor Code of Conduct**. All vendors should be given a copy of and follow the *Vendor Code of Conduct* and familiarize themselves with applicable Kaiser Permanente policies.

#### For More Information

Go to [kp.org/compliance](https://kp.org/compliance) and click **Vendors & Contractors** for a copy of Kaiser Permanente's *Vendor Code of Conduct* and the *Principles of Responsibility*.

When you contract with a vendor, you are responsible for making sure that vendor is following Kaiser Permanente's policies and all other requirements in the work that you are directing or have assigned to the vendor.

If you ever have a concern about the relationship you have with a vendor or independent contractor, talk with your **chief** or **immediate supervisor** and refer to the *Vendor Code of Conduct*. You also can find more by reviewing Section 8. Avoid Conflicts of Interest, Section 3.2 Follow Anti-Fraud Laws, and Section 8.5.5 Follow Anti-Kickback Laws.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your chief or immediate supervisor.



## 9. Meet Government Expectations and Cooperate With Government Inquiries

From time to time, federal and state agencies may make unannounced visits to our facilities to conduct inspections. You also may get an inquiry, subpoena, or other legal document from a government agency regarding **Kaiser Permanente's** business or care.

**Physicians and employees** must cooperate with government officials and contact your **chief, immediate supervisor**, or compliance officer right away. They will then contact your area's safety manager and Kaiser Permanente attorney, as appropriate.

Involving these people helps ensure that Kaiser Permanente's response is appropriate and meets all legal requirements.

Any documents, information, or testimony you provide to a government agency in response to an inquiry must be coordinated with Kaiser Permanente's attorneys and must be truthful, accurate, complete, and timely. If you discover or suspect that you or someone else has made a misstatement — either by saying something incorrect or by creating a misunderstanding or misimpression through an omission — you must disclose it immediately to a Kaiser Permanente attorney so Kaiser Permanente can quickly take steps to correct the situation.

### Consider This...

*I heard that Kaiser Permanente has been asked by the government to turn over documents for a grand jury investigation. I'd prefer not to provide them with my personal notes, which I always save just for my own reference. Would it be OK to destroy them?*

No. Deliberate destruction of documents that may be relevant in an investigation is illegal and against Kaiser Permanente policy. Never alter, conceal, or destroy documents or records if they have been requested by a government agency or if they are likely to be requested in connection with an investigation.

## 9.1 Interacting Appropriately With Government Officials

Most government officials and their staffs are prohibited from accepting anything of value, including **services** or **gifts**.

Speak with your compliance officer, the **Kaiser Permanente** attorney for your area, and/or the government relations department if you are thinking of offering gifts to any government officials or their staffs or inviting them to any Kaiser Permanente event.

## 9.2 Report Accurately to the Government

Any time that we are reporting to any federal, state, or local government agency, we must be accurate, complete, and timely. Here are some examples of this type of reporting:

- Centers for Medicare and Medicaid Services (CMS) cost reports — All cost and pricing information
- Corrective action plans (CAPs) — Responses to audit and investigation findings
- Medical records — Medical care and services
- Claim — Diagnostic and procedural coding requirements

**Physicians and employees** who are found guilty of providing misinformation could face criminal prosecution.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your **chief** or **immediate supervisor**.

## 9.3 Follow Licensing and Certification Requirements

Today's health care industry is highly regulated, including everything from federal and state licensure for professional practices to building codes and various medical services.

You are responsible for following all professional licensing and certification requirements that apply to you, including keeping them up to date.

### 9.3.1 If Convicted of a Crime

If you are convicted of a crime in a court of law, you are required to provide written disclosure to your **chief** or **immediate supervisor** as soon as possible. This applies regardless of the type of offense committed, such as a felony or misdemeanor.

### 9.3.2 Interacting With Individuals and Organizations Restricted by the Government

The government keeps lists of individuals and organizations that have been excluded from government contracting or are not allowed to contract or subcontract with the Medicare, Medicaid, or other government health programs. Everyone in **Kaiser Permanente**, affiliated with Kaiser Permanente, and doing business with Kaiser Permanente will be checked for exclusion.



We screen these lists prior to a job candidate becoming an employee of Kaiser Permanente and monthly after an individual is hired. If you are added to any of these government exclusion lists, you must provide written disclosure to your **chief** or **immediate supervisor** as soon as you become aware of it.

Any existing or proposed employment, contract, or other association with any individual or entity on these lists will be handled on a case-by-case basis in accordance with the law and Kaiser Permanente policies.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your chief or immediate supervisor.

## 9.4 Protect Kaiser Permanente During Political Activities and When Making Political Donations

Kaiser Foundation Health Plan, Inc. (KFHP) and Kaiser Foundation Hospitals (KFH) are tax-exempt organizations. The privilege of having a tax-exempt status comes with very strict rules under Internal Revenue Service regulations. Federal law prohibits KFHP and KFH from making political campaign contributions, directly or indirectly through their employees or any other persons. Similarly, reimbursing employees for participation in any partisan political activity would jeopardize this tax-exempt status.

**Check It Out:** See Section 1.2 Refer to and Follow Laws, Regulations, and Policies for where to find additional guidance, such as policies and procedures for your area, and check with your government relations department if you have questions.

If you are an employee of KFHP or KFH and are personally involved in politics, you must express your political views as an individual and not as a representative of KFHP or KFH or as a **physician or employee** of **Kaiser Permanente**. Your personal political activities or donations must occur on your own time and at your own expense, off Kaiser Permanente property.

The rules are slightly different for physicians and employees of the Permanente Medical Groups (**PMGs**), which are taxable organizations. Each of the PMGs has adopted policies that relate to political activities.





## Know How to Get Help

### 10. Speak Up if You Have Any Questions or Concerns

Kaiser Permanente's *Principles of Responsibility*, our code of conduct, provides guidance about business behavior expected of **physicians and employees** in our work and interactions with others.

There are many people and resources available to help you make ethical decisions, including:

- Your **chief, immediate supervisor, or management**
- Your human resources representative
- Your union representative
- Your compliance officer
- Your Kaiser Foundation Health Plan, Inc.; Kaiser Foundation Hospital; or Permanente Medical Group legal counsel or department, as appropriate
- Internal audit services
- Your controller's office
- The National Compliance, Ethics & Integrity Office or website at **kp.org/compliance**
- National, regional, and local policy websites
- The Compliance Hotline at 1-888-774-9100

## 10.1 Report Potential Compliance Issues

**Kaiser Permanente** is committed to maintaining, as appropriate, confidentiality and anonymity for all individuals reporting compliance issues, real or perceived. You can seek guidance and report possible violations without fear of retaliation.

It is better to report something you suspect is occurring than to ignore it because you aren't certain it is true.

### Consider This...

*I think my boss has some stake in a side business that contracts with Kaiser Permanente for skilled nursing care. I'm not sure about it, though. I don't want to report it in case I am wrong. What should I do?*

You should go ahead and report the issue to your local compliance officer. If you feel you want to make the report anonymously, you can call the Kaiser Permanente Compliance Hotline at 1-888-774-9100. Representatives from Kaiser Permanente's National Compliance, Ethics & Integrity office would rather follow up on this situation and discover that all relationships are legitimate than learn about a real **conflicts of interest** situation through public criticism or other external sources.

## 10.2 Call the Kaiser Permanente Compliance Hotline

It's always best to attempt to resolve an issue by talking with your **chief** or **immediate supervisor** or with any of the above contacts. If after doing so, you are still unable to address the issue, you can call the Kaiser Permanente Compliance Hotline for **physicians and employees** at 1-888-774-9100.

An outside firm answers all calls to the Compliance Hotline. Calls are never recorded or traced. Trained operators answer calls 24 hours a day, seven days a week. You can remain anonymous when you call or you can reveal your identity — it's up to you. When reporting a potential compliance issue, be prepared to provide detailed information. Without enough information it may not be possible to properly investigate the issue.

The information you provide is sent to the National Compliance, Ethics & Integrity Office for review and action. They respond to all calls, which are handled by departments with investigative responsibilities such as legal, compliance, internal audit services, human resources, finance, information technology, and others.

Intentionally making a false report to the Compliance Hotline is a serious violation of **Kaiser Permanente** policies. Anyone who does so will face disciplinary action.

Kaiser Permanente's reputation is in all our hands. We are fortunate to be guided by principles that have served us well and that will continue to make us proud. Thank you for reading the *Principles of Responsibility* with care, referring to them often, and committing to following them in your daily work.

