



Transplant Provider Manual Kaiser Permanente Self-Funded Program

Compliance

Table of Contents

8	SECTION 8: COMPLIANCE.....	3
8.1	COMPLIANCE WITH LAW	3
8.2	KAISER PERMANENTE PRINCIPLES OF RESPONSIBILITY AND COMPLIANCE HOTLINE	3
8.3	GIFTS AND BUSINESS COURTESIES.....	3
8.4	CONFLICTS OF INTEREST	4
8.5	FRAUD, WASTE AND ABUSE	4
8.6	PROVIDERS INELIGIBLE FOR PARTICIPATION IN GOVERNMENT HEALTH CARE PROGRAMS.....	4
8.7	VISITATION POLICY	5
8.8	PROVIDER RESOURCES:	5

8 Section 8: Compliance

Kaiser Permanente (KP) strives to demonstrate high ethical standards in its business practices. Because Providers are an integral part of KP's business, it is important that we communicate and obtain your support for these standards. The Agreement details specific laws and contractual provisions with which you are expected to comply. This section of the Provider Manual highlights some provisions in the Agreement and provides some additional information about compliance.

8.1 Compliance with Law

Providers are expected to conduct their business activities in full compliance with applicable laws, including the Health Insurance Portability and Accountability Act (HIPAA) of 1996 and its implementing privacy and security regulations.

8.2 Kaiser Permanente Principles of Responsibility and Compliance Hotline

The Kaiser Permanente Principles of Responsibility ("POR") is the code of conduct for Kaiser Permanente physicians, employees and contractors working in KP facilities ("KP Personnel") in their daily work environment. You should report to Kaiser Permanente any suspected wrongdoing or compliance violations by KP Personnel under the POR. The Kaiser Permanente Compliance Hotline is a convenient and anonymous way to report a suspected wrongdoing without fear of retaliation. It is available 24 hours per day, 365 days per year. The toll free Compliance Hotline number is 1-888-774-9100.

Attached is the copy of Kaiser Permanente Principles of Responsibility ("POR") for your reference.



Kaiser Permanente
Principles of Responsi

8.3 Gifts and Business Courtesies

You are expected to comply with all applicable state and federal laws governing remuneration for health care services, including anti-kickback and physician self-referral laws. Even if certain types of remuneration are permitted by law, Kaiser Permanente discourages Providers from providing gifts, meals, entertainment or other business courtesies to KP Personnel, in particular

- Gifts or entertainment that exceed \$25.00 in value
- Gifts or entertainment that are given on a regular basis

- Cash or cash-equivalents, such as checks, gift certificates/cards, stocks, or coupons
- Gifts from government representatives
- Gifts or entertainment that reasonably could be perceived as a bribe, payoff, deal or any other attempt to gain advantage
- Gifts or entertainment given to KP Personnel involved in Kaiser Permanente purchasing and contracting decisions.

8.4 Conflicts of Interest

Conflicts of interest between a Provider and KP Personnel, or the appearance of it, should be avoided. There may be some circumstances in which Self-Funded Members of the same family or household may work for Kaiser Permanente and for a Provider. However, if this creates an actual or potential conflict of interest, you must disclose the conflict at the earliest opportunity, in writing, to a person in authority at Kaiser Permanente (other than the person who has the relationship with the Provider). You may call the toll free Compliance Hotline number at 1-888-774-9100 for further guidance on potential conflicts of interest.

8.5 Fraud, Waste and Abuse

Kaiser Permanente will investigate allegations of Provider fraud, waste or abuse, related to services provided to Self-Funded Members, and where appropriate, will take corrective action, including but not limited to civil or criminal action. The Federal False Claims Act and similar state laws are designed to reduce fraud, waste and abuse by allowing citizens to bring suit on behalf of the government to recover fraudulently obtained funds (i.e., “whistleblower” or “qui tam” actions). KP Personnel may not be threatened, harassed or in any manner discriminated against in retaliation for exercising their rights under the False Claims Act or similar state laws.

8.6 Providers Ineligible for Participation in Government Health Care Programs

Under Kaiser Permanente policy, we will not do business with a provider if it or any of its officers, directors or employees involved in Kaiser Permanente business is, or becomes excluded by, debarred from, or ineligible to participate in any federal health care program or is convicted of a criminal offense related to the provision of health care. Kaiser Permanente expects you to (a) disclose whether any of its officers, directors or employees becomes sanctioned by, excluded from, debarred from, or ineligible to participate in any federal program or is convicted of a criminal offense related to the provision of healthcare and (b) assume responsibility for taking all necessary steps to assure that your employees and agents directly or indirectly involved in Kaiser Permanente

business have not or are not currently excluded from participation in any federal program.

8.7 Visitation Policy

When visiting Kaiser Permanente facilities (if applicable), you are expected to comply with the applicable visitation policy, which is available at Kaiser Permanente facilities upon request. “Visitor” badges provided by the visited Kaiser Permanente facility must be worn at all times during the visit.

8.8 Provider Resources:

- Kaiser Permanente Provider Compliance Website:
<http://xnet.kp.org/compliance/external/index.html>
- Kaiser Permanente’s National Compliance Office (510) 271-4699
- Kaiser Permanente’s Compliance Hotline (888) 774-9100
- Provider Contracting Department (510) 268-5448