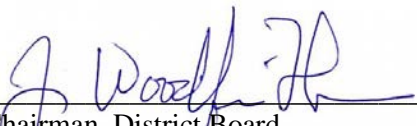




Maricopa County Special Health Care District
Code of Conduct and Ethics
November 26, 2024


Summary of Approvals

Approval Signatures:



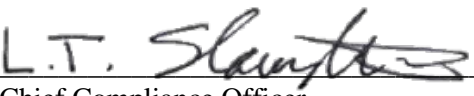
Chairman, District Board
Maricopa County Special Health Care District

November 26, 2024
Date



President and Chief Executive Officer
Valleywise Health

November 26, 2024
Date



Chief Compliance Officer
Valleywise Health

November 26, 2024
Date

Code of Conduct and Ethics Effective November 26, 2024

I. PURPOSE

This Code of Conduct and Ethics (“Code”) has been adopted by the Maricopa County Special Health Care District, d/b/a Valleywise Health (“Valleywise Health”), Board of Directors (“District Board”) to provide standards by which the District Board, Valleywise Community Health Centers Governing Council (“Governing Council”), Employees, Administration, Providers, Agents, Contractors, Vendors and other Valleywise Health committee members will conduct themselves to protect and promote organization-wide integrity and to enhance Valleywise Health’s ability to achieve its organizational mission. The Code is intended to serve as a guide to assist the District Board, Governing Council members, Employees, Administration, Providers, Agents, Contractors, Vendors and other Valleywise Health committee members to make sound decisions in carrying out their day-to-day responsibilities.

II. RESPONSIBILITIES UNDER THE CODE OF CONDUCT and ETHICS

Who must comply with the District’s Code of Conduct and Ethics?

The Code applies to *all* members of the District Board, Governing Council members, Employees, Administration, Providers, Agents, Contractors, Vendors, and other Valleywise Health committee members. Valleywise Health recognizes the different missions and services that each of these entities provide in developing policies and procedures to achieve the standards and goals set forth in the Code while maintaining each of their unique missions and services.

Definitions:

Administration: Executive leadership (including President and Chief Executive Officer, Executive Vice Presidents, and Senior Leadership including Senior Vice Presidents and Vice Presidents, and Chief Compliance Officer) of Valleywise Health.

Advanced Practice Clinicians (APCs): Individuals other than Medical Staff members or AHPs who are licensed healthcare professionals who are board certified and have at least a master’s degree. APCs are trained to practice medicine and prescribe within the scope of their training as outlined by their specific scope of practice and are authorized by law and by the Hospital to provide patient care services.

Allied Health Professionals (AHPs): Individuals other than Medical Staff members or APCs who are qualified by training, experience, and current competence in a discipline permitted to practice in the hospital and are authorized by law and by the Hospital to provide patient care services.

Board of Directors – The five publicly elected officials that serve on the Maricopa County Special Health Care District, d/b/a Valleywise Health, for Maricopa County, Arizona.

Clinical Privileges or Privileges: The authorization granted by the District Board to render specific patient care services, for which the Medical Staff leaders and the District Board have developed eligibility and other privileging criteria and focused and ongoing professional practice evaluation standards.

Contractors: A person or entity who is not employed by Valleywise Health and who is performing specific services as defined in their contract.

Finance, Audit and Compliance Committee (FACC): An advisory committee to assist Valleywise Health’s President and Chief Executive Officer (“CEO”) with oversight responsibilities related to compliance and financial matters, and internal and external audit functions.

Governing Council: Governing body that maintains oversight of the Federal Qualified Health Center (FQHC).

House Staff: Includes residents, fellows, and individuals licensed as appropriate, who are graduates of medical, allopathic and osteopathic, dental, or podiatric schools; who are appointed to a hospital’s professional graduate training program that is approved by a nationally recognized accrediting body; and who participate in patient care under the direction of a member of the Medical Staff of the pertinent clinical disciplines with appropriate clinical privileges in the hospital.

Management: – Valleywise Health Employees who provide supervision to other Valleywise Health Employees.

Medical Staff: All physicians, dentists, oral surgeons, and podiatrists who have been appointed to the Medical Staff by the District Board.

Provider: A Medical Staff member with Clinical Privileges, a House Staff member, an Advanced Practice Clinician, or an Allied Health Professional.

Vendor: Any person or entity under contract with Valleywise Health to provide goods.

Workforce Member: Governing Council members, Valleywise Health Employees, Providers, Agents, and other Valleywise Health committee members whether or not they are paid by Valleywise Health.

What are your responsibilities as a Valleywise Health employee with regard to the Code?

Foster and support an atmosphere of compliance by:

- Reading the Standards of Conduct and Ethics contained in the Code and think about their application to your work. You should have a basic understanding of issues covered by each Standard and the supplemental compliance policies that apply to your job function.
- Seeking guidance from your supervisor(s), Administration, Management, the Chief Compliance Officer or other Valleywise Health leadership resources when you have questions about the application of the standards and other Valleywise Health policies related to your work.
- Understanding the options that Valleywise Health makes available to you for conduct or ethical concerns and promptly raise such concerns with your immediate supervisor or Valleywise Health’s Chief Compliance Officer or General Counsel. If you prefer to raise your concerns anonymously, call the Valleywise Health Compliance Hotline Line 1-866-333-6447 and/or you can file a concern on the Valleywise Health internal website (i.e., The Vine) under “Report a Compliance Concern”.
- Cooperating in Valleywise Health’s investigations concerning potential violations of the law, government payer regulations and rules, the Code, the Valleywise Health Compliance Program and Valleywise Health’s policies and procedures.
- Completing all required compliance training.

- Understanding that accessing a patient’s personal health information (PHI), where you are not involved in their care, would be a violation of Valleywise Health’s privacy policies. Employees should only use MyChart to access their own PHI. Additionally, Employees should not access their relatives or anyone else’s PHI where they are not involved in their care (See Policy 01261 S). Taking pictures with a personal camera or cell phone (especially in a treatment area) is a violation of Valleywise Health’s policies and will result in immediate disciplinary actions.

What are your responsibilities as Valleywise Health’s Administration and Management?

Build and maintain a culture of compliance by:

- Leading by example, using your own behavior as a model for all Employees.
- Knowing, understanding, and following the federal, state, and local statutes, rules and regulations that govern your area(s) of responsibility.
- Encouraging Employees to raise conduct and ethical questions and concerns.
- Ensuring that all Workforce Members (within your areas of responsibility) complete all required annual compliance training.

Prevent compliance problems by:

- Identifying potential compliance risks and proposing appropriate policies, procedures, and actions to address such risks.
- Identifying Workforce Member’s whose activities have compliance risks and that are covered by Valleywise Health’s policies and procedures.
- Providing education, role playing and counseling to assist Workforce Members to understand the Code, Valleywise Health policies and procedures, applicable laws, and government payer regulations and rules.

Detect compliance problems by:

- Maintaining appropriate controls to monitor compliance and mechanisms that foster the effective reporting of potential compliance issues.
- Promoting an environment that permits Workforce Members to raise concerns without fear of retaliation.
- Arranging periodic compliance reviews that are conducted with the assistance of Valleywise Health’s Chief Compliance Officer to assess the effectiveness of Valleywise Health’s Compliance Program and related policies and procedures, and to identify methods of improving them.

Respond to compliance problems by:

- Pursuing prompt corrective action to address weaknesses in internal controls.

- Applying corrective action(s) and disciplinary plans when necessary.
- Consulting with Valleywise Health's Chief Compliance Officer to ensure compliance issues are promptly and effectively addressed.

What are your responsibilities as the District's Board of Directors

Build and maintain a culture of compliance by:

- Reading the Standards of Conduct and Ethics contained in the Code, thinking about them and their application to your role.
- Leading by example, using your own behavior as a model for others.
- Making decisions that are in the best interest of Valleywise Health and that are not affected by conflicts of interest (See the District Board Conflicts of Interest and Gift Policy - 99305 G).
- Being knowledgeable about the Valleywise Health Compliance Program (as taught in the new District Board member training and in the annual compliance training) and exercise governance and oversight over it.
- Requiring appropriate reports from Administration concerning the status of the Valleywise Health Compliance Program, the resources required to maintain its vitality and Valleywise Health's response to identified compliance deficiencies.
- Receiving and acting on compliance issues, upon advice from Valleywise Health's President and Chief Executive Officer, District Board Counsel, General Counsel, and/or Chief Compliance Officer.
- Assuring that the Compliance Program is free from undue restraints and influences through direct reporting by the Chief Compliance Officer regarding compliance issues that promote the integrity of the Compliance Program and raising any concerns with the Chief Compliance Officer, District Board Counsel and General Counsel.
- Maintaining the confidentiality of all compliance-related information provided to you, subject to the requirements of applicable law.
- Complete required compliance training.

What are your responsibilities as Provider?

Assist Valleywise Health to foster an atmosphere of compliance by:

- Reading the Standards of Conduct and Ethics contained in the Code and think about their application to your work. You should have a basic understanding of issues covered by each Standard and the supplemental compliance policies that apply to the services you furnish to Valleywise Health and our patients.
- Actively participating in compliance activities as requested by Valleywise Health.

- Maintaining the confidentiality of information provided to you relating to compliance issues subject to applicable laws.
- Assisting Valleywise Health in identifying potential compliance issues and in developing possible solutions to address issues identified.
- Understanding the options that Valleywise Health makes available for you to report ethical concerns and to promptly raise such concerns with Valleywise Health’s Chief Compliance Officer or General Counsel. If you prefer to raise your concerns anonymously, call the Valleywise Health Compliance Hotline 1-866- 333-6447 and/or you can file a concern on the Valleywise Health’s internal website (i.e., The Vine) under “Report a Compliance Concern.”
- Cooperating in Valleywise Health investigations concerning potential violations of the law, government payer regulations and rules, the Code, the Valleywise Health Compliance Program and Valleywise Health’s policies and procedures.
- Completing required compliance training.
- Understanding that accessing a patient’s personal health information (PHI), where you are not involved in their care, would be a violation of Valleywise Health’s privacy policies. Providers should only use MyChart to access their own PHI. Additionally, Providers should not access their relatives or anyone else’s PHI where they are not involved in their care (See Policy 01261 S). Taking pictures with a personal camera or cell phone (especially in a treatment area) is a violation of Valleywise Health’s policies and will result in immediate disciplinary action.

What are your responsibilities as Governing Council Member, Agents, Contractors, Vendors or other Valleywise Health committee member (e.g., FACC member)?

Governing Council Members, Agents, Contractors, Vendors and other Valleywise Health committee members are responsible to participate in the Valleywise Health compliance program by:

- Understanding and applying the Standards of Conduct and Ethics contained in the Code and think about their application to the services you furnish to Valleywise Health. You should have an understanding of issues covered by each Standard and the supplemental compliance policies that apply to the services you furnish to Valleywise Health.
- Actively participating in compliance activities, such as education, role playing and training, as requested by Valleywise Health or have equivalent requirements in their contract.
- Understanding the various options that Valleywise Health makes available for raising conduct or ethical concerns and promptly raise such concerns. You should raise such concerns with Valleywise Health’s Chief Compliance Officer or General Counsel. If you prefer to raise your concerns anonymously, call the Valleywise Health Compliance Hotline 1-866-333-6447 and/or you can file a concern on the Valleywise Health’s internal website (i.e., The Vine) under “Report a Compliance Concern”.
- Cooperating in Valleywise Health’s investigations concerning potential violations of law, government payer regulations and rules, the Code, the Valleywise Health Compliance Program and Valleywise Health’s policies and procedures.
- Completing required compliance training.

How May the Code Be Revised?

This Code may be amended, modified only after a review by the FACC, Chief Executive Officer and the approval of the District Board.

How Frequently will the Code and Compliance Program Be Reviewed?

The Code will be reviewed annually by the FACC and District Board to foster its effectiveness and at such times when changes to it are necessitated by changes in laws and regulations applicable to Valleywise Health. Suggested changes to the Valleywise Health Compliance Program will be presented to the District Board for approval, as necessary.

III. STANDARDS OF CONDUCT AND ETHICS (THE STANDARDS)

Patient Relationships: Valleywise Health (We) through our Administration, Clinical Departments, Providers and Quality Department (and other departments as needed) are committed to providing a high quality of healthcare and services to our patients, their families, visitors, and the community. We treat all patients with respect and dignity and provide care that is necessary and appropriate.

Principles:

- We will recognize the right of our patients to receive quality and appropriate services provided by competent individuals in an efficient, cost effective and safe manner.
- We will continually monitor the clinical quality of the services we provide and will endeavor to improve the quality of the services provided.
- We will support every patient's right to be free from all types of abuse and will not tolerate patient abuse in any form.
- We will apply our admission, treatment, transfer, and discharge policies equally to all patients based upon identified patient needs and regardless of a patient's ability to pay.
- We will listen to our patients, families, and visitors to understand any concerns or complaints and will involve patients in the decision-making process about their care.
- We will demonstrate our commitment to patient safety by continuously reviewing systems, processes and policies to detect and prevent medical errors.
- We will provide treatment and medical services in accordance with the state and federal laws which provide that an individual shall not be excluded from participation in, be denied the benefits of, or subjected to discrimination on prohibited grounds, such as age, disability, genetic information, national origin, pregnancy, race/color, religion, sex, sexual orientation and gender identity.
- We will remain sensitive to our position as a regional leader in tertiary and specialty care and research, and to our consequent obligation as a health care leader to all segments of our community.

- We will maintain policies and procedures (e.g., Emergency Medical Treatment and Labor Act (EMTALA) policies) to complete logging in the central log, performing a medical screening exam and stabilizing all patients presenting to our Emergency Department (ED) [e.g., Roosevelt Campus (including trauma) and Maryvale Campus] and at our Dedicated Emergency Departments (DED) [e.g., Burn, Labor and Delivery].
- We will fully and fairly evaluate requests to transfer patients to our care from our colleagues and providers in outlying areas and will accept such transfers as clinically appropriate (i.e., EMTALA transfers-in). Additionally, we will fully and fairly transfer patients to external entities (i.e., EMTALA transfers-out) as clinically appropriate as directed by our Medical Staff.
- We will maintain licensure and credentialing standards to further the provision of clinical services by properly trained and experienced practitioners.
- We will perform background checks of existing and potential Governing Council members, other Valleywise Health committee members (as appropriate), Employees, Providers, Agents, and Contractors. We will also assess whether such individuals and entities (including Vendors) have ever been excluded from participation in any of the federal or state health care programs, including the Medicare, Medicaid, and Arizona Health Care Cost Containment System (AHCCCS) programs.
- We will respect the privacy of our patients, and we will treat all patient information with confidentiality, in accordance with all applicable laws, regulations and professional standards.

General Legal and Regulatory Compliance: Valleywise Health (We) through our Legal Department, Regulatory Department, Compliance Department and Administration (and other departments as needed) will continuously and vigorously promote full compliance with applicable laws.

Principles:

- We will continuously study our legal obligations and create policies and procedures that facilitate compliance by educating the District Board, Governing Council members, Employees, Administration, Providers, Agents, Contractors, Vendors and other Valleywise Health committee members of their legal obligations.
- We will recognize the critical role of research in improving the health status of our community, and we are committed to conducting all research activities in compliance with the highest ethical, moral, and legal standards.
- We will engage in open and fair competition and marketing practices, based on the needs of our community and consistent with the furtherance of our mission.
- We will treat our Employees with respect and will engage in human relations practices that promote the personal and professional advancement of each employee.
- We will recognize that our Employees work in a variety of situations and with a variety of materials, some of which may pose a risk of injury. We are committed to providing a safe work environment and will maintain and monitor policies and procedures for workplace safety that are designed to comply with federal and state safety laws, regulations, and workplace safety directives.

- We will recognize that the provision of health care may in some instances produce hazardous waste products or other risks involving environmental impact. We are committed to compliance with applicable environmental laws and regulations and will follow proper procedures with respect to handling and disposing of hazardous and bio-hazardous waste.
- We will assist our District Board, Governing Council members, Employees, Administration, Providers, Agents, Contractors, Vendors, and other Valleywise Health Committee members with understanding the basic legal obligations that pertain to their individual job functions or services they furnish to Valleywise Health and our patients. We will also encourage them to make certain that their decisions and actions are conducted in conformity with such laws, regulations, policies, and procedures.
- We will support educational and other training sessions to teach the District Board, Governing Council members, Employees, Administration, Agents, and Providers and, as warranted, Contractors and Vendors, about the impact of the law on their duties and to promote compliance with our collective legal obligations.
- We will support and maintain multiple resources for the District Board, Governing Council members, Employees, Administration, Providers, Agents, Contractors, and Vendors to voice any questions about the proper interpretation of a particular law, regulation, policy, or procedure while performing services for Valleywise Health.

Avoidance of Conflicts of Interest for the Governing Council members, Employees, Administration, Providers, Agents, Contractors, Vendors and other Valleywise Health committee members.

Governing Council members, Employees, Administration, Providers, Agents, Contractors, Vendors and other Valleywise Health committee members maintain a duty of loyalty to Valleywise Health and to all of the citizens of Maricopa County and, as a result, must avoid any activities that may involve (or may appear to involve) a conflict of interest or that may influence or appear to influence the ability of the, Governing Council member, employee, Administration, Providers, agent, Contractors, Vendors and other Valleywise Health committee members to render objective decisions in the course of their job responsibilities, or other services they furnish to Valleywise Health (See the Valleywise Health Conflict of Interest and Gift Policy (See 01291 S).

Principles:

Valleywise Health (We) through Administration and the Compliance Department (and other departments as needed) will maintain policies and procedures that make clear when an individual's private interests may inappropriately interfere with Valleywise Health's interests; and will provide support through which the Governing Council members, Employees, Administration, Providers, Agents, Contractors, and Vendors, and other Valleywise Health committee members (See the Valleywise Health Conflict of Interest and Gift Policy (See 01291 S) may disclose and have an evaluation about whether a particular activity or relationship could be construed as a conflict of interest or otherwise improper.

- We will provide examples of the conduct that must be demonstrated by the Governing Council members, Employees, Administration, Providers, Agents, Contractors, Vendors and other Valleywise Health committee members (See 01291 S) in the performance of services for Valleywise Health and will require that such individuals to evaluate and report conflicts of interest in the performance of their responsibilities and services to Valleywise Health.

- We will educate the Governing Council members, Employees, management, Administration, Providers, Agents, Contractors, Vendors, and other Valleywise Health committee members (See 01291 S about informing Valleywise Health of personal business ventures and other arrangements that could be perceived as conflicts of interest and will provide for policies and procedures for doing so.
- We will educate the Governing Council members, Employees, Administration, Providers, Agents, Contractors, Vendors and other Valleywise Health committee members (See 01291 S) about the use any proprietary or non-public information acquired as a result of a relationship with Valleywise Health for person gain or for the benefit of another business opportunity.
- We will educate the Governing Council members, Employees, Administration, Providers, Agents, Contractors, Vendors and other Valleywise Health committee members about the purchase of outside goods based on the Vendor’s ability to best satisfy Valleywise Health’s needs and not based on personal relationships.
- We will educate the Governing Council members, Employees, Administration, Providers, Agents, Contractors, Vendors and other Valleywise Health committee members about the purchase of outside services based on the Contractor’s ability to best satisfy Valleywise Health’s needs and not based on personal relationships.
- The Governing Council members, Employees, Administration, Providers, Agents, Contractors, Vendors and other Valleywise Health committee members (See 01291 S) shall not use their official position for personal gain. Public influence and confidential or “inside” information must never be used for personal advantage. Conflict of interest laws, A.R.S. § 38-501 *et. seq.* must be scrupulously observed. The conflict-of-interest laws prohibit participation by public officers, elected officials, Management, Administration or Employees in a decision or contract in which they have a direct or indirect pecuniary or proprietary interest, as required by A.R.S. §38-502.

Avoidance of Conflicts of Interest for the District Board

Principles

Valleywise Health (We) through the District Clerk’s Office, the Legal Department and the Compliance Department (and other departments as needed), will maintain policies and procedures that make clear when a District Board members private interests may inappropriately interfere with Valleywise Health’s interests; and will provide support through which the District Board (See the District Board Conflicts of Interest and Gift Policy (See 99305 G),) may disclose and have an evaluation about whether a particular activity or relationship could be construed as a conflict of interest or otherwise improper.

- The District Board Conflicts of Interest and Gift Policy (See 99305 G) (hereafter “See 99305 G”) establishes the policy and procedure for the District Board and defines a Gift as well as District Board conflicts of interest and will require that District Board members to evaluate and report conflicts of interest in the performance of their responsibilities and services to Valleywise Health.
- We will educate the District Board (See 99305 G) about informing Valleywise Health of personal business ventures and other arrangements that could be perceived as conflicts of interest and will provide for policies and procedures for doing so.

- We will educate the District Board (See 99305 G) about the use any proprietary or non-public information acquired as a result of a relationship with Valleywise Health for person gain or for the benefit of another business opportunity.
- We will educate the District Board (See 99305 G) about the purchase of outside goods based on the Vendor's ability to best satisfy Valleywise Health's needs and not based on personal relationships.
- We will educate the District Board (See 99305 G) about the purchase of outside services based on the Contractor's ability to best satisfy Valleywise Health's needs and not based on personal relationships.
- The District Board (See 99305 G) shall not use their official position for personal gain. Public influence and confidential or "inside" information must never be used for personal advantage. Conflict of interest laws, A.R.S. § 38-501 *et. seq.* must be scrupulously observed. The conflict-of-interest laws prohibit participation by public officers, elected officials, Management, Administration or Employees in a decision or contract in which they have a direct or indirect pecuniary or proprietary interest, as required by A.R.S. §38-502.

Relationship with Payers: Valleywise Health (We) through our Health Management Information (HIM), Revenue Cycle, Compliance Providers and Clinical Departments (and other departments as needed) will consistently strive to satisfy the conditions of payment required by the payers with which Valleywise Health transacts business.

- We will promote compliance with laws governing the submission and review of bills for our services and will deal with billing inquiries in an honest and forthright manner.
- We will maintain reasonable measures to prevent the submission or filing of inaccurate, false, or fraudulent claims to payers.
- We will utilize systematic methods for analyzing the payments we receive and will reconcile inaccurate payments in a timely manner after discovery and review.
- We will investigate potential or reported inaccurate billings and payments to determine whether changes to current protocol or other remedial steps are necessary.
- We will maintain documentation systems sufficient to create and maintain complete and accurate documentation of services provided.
- We will review cost reports to be filed with the federal and state health care programs to determine whether such reports accurately and completely reflect the operations and services provided to beneficiaries and to confirm that such reports are completed in accordance with applicable federal and state regulations and Valleywise Health's policies and procedures.
- We will, as necessary, rely on internal and external sources to help improve Valleywise Health's billing and coding protocol and to identify potential areas of noncompliance.
- We will notify impacted plan administrators and third parties within a reasonable time (including but not limited to, Medicare Part C entities) of any detected fraud, waste or abuse activities or other violations (including HIPAA privacy or security, etc.), advise of actions taken, and will work with them if necessary to implement or adjust timely corrective actions.

- We will maintain all Medicare Part C documentation (including training, exclusion checks, and other compliance documentation for at least 10 years).
- We will compensate billing and coding staff and billing/coding consultants for services rendered, in a manner that is permitted under law and will not compensate such persons in any way related to collections or maximization of revenues.

Relationship with Providers: Valleywise Health (We) through our Administration, Management, Compliance and Legal Department (and other departments as needed) will monitor its business dealings to structure relationships in ways that satisfy the needs of the community.

- We will maintain relationships with Providers based only on the needs of our community and consistent with our mission.
- We will treat referral sources fairly and consistently, and will not provide remuneration that could be considered payment for referrals, including:
 - Free or below-market rents; Administrative or staff services at no- or below-cost;
 - Grants in excess of amounts for *bona fide* research or other services rendered;
 - Interest-free loans; or
 - Gifts (See 01291 S) or other payments intended to induce referrals.
- We will maintain policies, procedures and other protocol which require fair market value determinations for services rendered by referral sources and for services rendered by Valleywise Health. (See policies 01111 S False Claims and 01119 S Anti-Kickback Statue)
- We will maintain procedures to require all agreements with referral sources to be reduced to writing and reviewed and approved as appropriate under law and Valleywise Health's policies and procedures. (See policies 01111 S False Claims and 01119 S Anti-Kickback Statue)
- We will train the appropriate personnel on the primary laws and regulations governing the referral of patients and other legal restrictions on the manner in which Valleywise Health transacts business, including the penalties that may result for violations of such laws.

Respect for Our Culture: Valleywise Health (We) through our Human Resources Department, Administration, and Management (and other departments as needed) recognize that a diverse workforce enriches the life experience of all Employees and our community and will promote diversity.

- We will provide equal employment opportunities to Employees and applicants for employment without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, marital status, political belief, age, veteran status, or disability, in accordance with applicable law.
- We will maintain policies and procedures that promote compliance with laws governing nondiscrimination in personnel actions, including recruiting, hiring, training, evaluation, transfer, workforce reduction, termination, compensation, counseling, discipline, and promotion of Employees.

- We will promote diversity with respect to individuals with disabilities and will make reasonable accommodations to any individual as required by law.
- We will recognize the right of our Employees to a workplace free of violence and harassment and will not tolerate any form of harassment or violence toward our Employees.
- We will maintain policies and procedures that promote appropriate conduct in the workplace and prohibit unwanted or hostile interaction, including degrading or humiliating jokes, physical or verbal intimidation, slurs, or other harassing conduct.
- We will not tolerate any form of sexual harassment, either overt, such as request for sexual favors in return for promotions, or less obvious forms of harassment, such as sexual comments.
- We will maintain policies and procedures prohibiting workplace violence, including robbery, stalking, assault, terrorism, hate crimes, or violence against any Employees.
- We will maintain policies, procedures, and practices prohibiting retaliation in any form for reporting.

Information Systems: Valleywise Health (We) recognize that the provision of healthcare services generates business, financial, and patient-related information that requires special protection. We will establish systems that ensure such information is used appropriately and safeguarded zealously.

- We are committed to the privacy, security and integrity of documents and records in our possession, and will develop systems, policies, and procedures sufficient to safeguard the privacy, security and integrity of our documents and records, including systems, policies, and procedures to:
 - Establish retention periods and protocols for business, financial, and patient records in the Valleywise Health system. We will maintain required documentation to meet all record retention standards, including but not limited to Medicare Parts A, B, C (i.e., ten years), D and Medicaid.
 - Prevent the altering, removal, or destruction of records or documents except according to Valleywise Health's records retention policy and applicable ethical and legal standards.
 - Promote the accurate, thorough, detailed, and complete documentation of all business, financial, and patient transactions.
 - Control and monitor access to Valleywise Health's information system, communications systems, electronic mail, internet access, and voicemail to ensure that such systems are accessed appropriately and used in accordance with Valleywise Health's policies and procedures.
 - Protect the privacy and security of patient medical, billing, and claims information by maintaining sufficient physical, systemic, and administrative measures to prevent unauthorized access to or use of patient information, and to track disclosures of such information as required by law.
 - Provide access to medical, billing, and claims information for our patients and their legal representatives as required by law.

- Safeguard the personal and human resources information of our Employees, including salary, benefits, medical, and other information retained within the human resources system as required by law.

IV. VIOLATIONS OF THE CODE OF CONDUCT AND ETHICS

Valleywise Health is committed to providing the District Board, Governing Council members, Employees, Administration, Providers, Contractors, Vendors, Agents, and other Valleywise Health committee members with a means of raising questions and concerns and reporting any conduct that is suspected to be in violation of this Code. District Board members, Governing Council members, Employees, management, Administration, Providers, Contractors, Vendors, Agents, and other Valleywise Health committee members are expected and required to communicate any suspected, detected or reported violations of the Code to a direct supervisor, the Chief Compliance Officer, Human Resources or General Counsel, as applicable. If you prefer, you can anonymously call the Valleywise Health Compliance Hotline 1-866-333-6447 and/or you can file a concern on the Valleywise Health's internal website (i.e., The Vine) under "Report a Compliance Concern". The Chief Compliance Officer will maintain primary responsibility for investigating reports received on this hotline.

The following list, while not exhaustive, describes the type of concerns and questions that you should raise with your supervisor, the Chief Compliance Officer, Human Resources, General Counsel or through the Valleywise Health Compliance Hotline:

- Allegations, discrimination, or retaliation.
- The possible submission of false, inaccurate, or questionable claims to Medicare, Medicaid, AHCCCS or any other payer.
- The provision or acceptance of payments, discounts, or gifts (See 01291 S) in exchange for referrals of patients.
- The utilization of improper physician recruitment techniques under applicable law.
- Situations that could raise conflict-of-interest concerns.
- Potential breaches of confidentiality or privacy.



CERTIFICATION

I acknowledge and certify that I have received and read the Maricopa County Special Health Care District d/b/a Valleywise Health’s Code of Conduct and Ethics.

I agree to comply with the Maricopa County Special Health Care District d/b/a Valleywise Health’s Code of Conduct and Ethics.

Maricopa County Special Health Care District - District Board

Initials: _____

Governing Council

Initials: _____

Administration, Management and Employees: I understand that compliance with this Code is a condition of my continued employment. I further understand that violation of the Code may result in disciplinary action up to and including termination.

Initials: _____

Providers: I understand that compliance with this Code is a condition to my ability to practice my profession at Valleywise Health. I further understand that violation of the Code may result in disciplinary action as provided in the Bylaws of the Medical Staff/Providers.

Initials: _____

Agents, Contractors, Vendors and Other Valleywise Health Committee Members (including FACC): I understand that compliance with this Code is a condition of my continued ability to furnish services to Valleywise Health. I further understand that violation of the Code may result in a termination by Valleywise Health of any relationship I have with Valleywise Health.

Initials: _____

Please sign here: _____

Date: _____

Please print your name: _____

Dept: _____