



# LIVING OUR VALUES

## CODE OF CONDUCT

Board of Director Approved 3.13.2023



## Message from the CEO

Every day at Palomar Health, we ask our patients and their families for their trust – trust in our ability to provide excellent patient care in a safe and compassionate way. To earn this trust, we must behave safely and ethically in everything we do – our Code of Conduct.

Palomar Health’s Code of Conduct is the foundation that helps fulfill our commitments to each other, to our partners and to our patients and their families. This also ensures we stay aligned with the law, regulations and Palomar Health policies and procedures. It is important that we understand and agree to uphold the principles outlined in the Code of Conduct each day.

If you have any questions or ethical concerns regarding a situation at Palomar Health, I encourage you to contact your supervisor or the Palomar Health Compliance department. We welcome your comments and enforce a strict non-retaliation policy. If you wish to remain anonymous, you may also call the Values Lines at **1.800.850.2551** or visit **PalomarHealth.org/SpeakUp**

Thank you for your commitment to deliver high-quality, safe patient care to every patient, every time.

Sincerely,

**Diane Hansen**  
President and CEO

## Our Mission

To heal, comfort and promote health in the communities we serve.

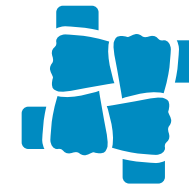
## Our Vision

Palomar Health will be the health system of choice for patients, physicians and employees, recognized nationally for the highest quality of clinical care and access to comprehensive services.

## Our Values



Excellence



Teamwork



Service



Compassion



Trust



Integrity

# Navigating the Code of Conduct

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# What is the Code of Conduct?

## Why is it Important to Me?

*Our values serve as a guide for the decisions we make.*

The Code of Conduct highlights the connection between the work we do every day and our values. It provides examples of what it means to live our values: Excellence, Teamwork, Service, Compassion, Trust and Integrity.

To achieve Palomar Health's mission and vision, each of us must do our part to deliver extraordinary care in line with the law, Palomar Health policies and procedures and our Code of Conduct.

This resource guide is the foundation of our Ethics and Compliance program. It outlines:

- The organization's ethical and professional standards.
- The methods which are available for reporting issues in conflict with our standards.

All employees, volunteers and independent contractors are responsible for knowing, understanding and following our Code of Conduct and the policies and procedures it reinforces.

For more information on any topic presented in this guide, refer to Palomar Health's policies and procedures.



# Ethical Self-Assessment

Since the Code of Conduct cannot address every potential situation, here are some general questions to help apply the principles in this guide:



# EXCELLENCE



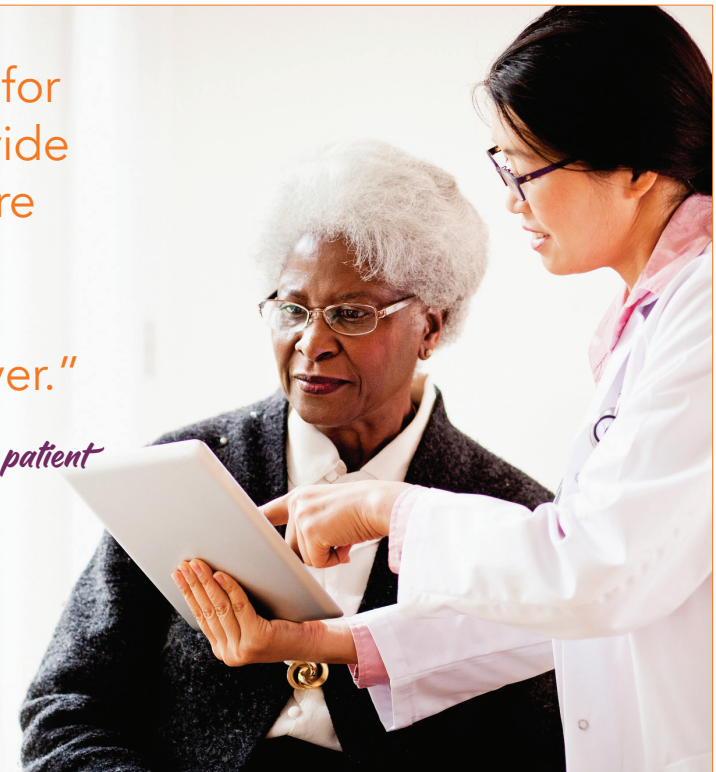
*Aspiring to be the best*

## EXCELLENCE BEHAVIOR STANDARDS

- I research the best practices in my area of expertise and proactively seek opportunities for continued growth and improvement.
- I care for myself so I can bring a positive and helpful attitude to my daily work.
- I accept coaching as part of continuous improvement.
- I deliver high-quality outcomes while maintaining integrity.
- I assess my own competence and seek consultations and help from qualified resources when appropriate.
- I commit to being accountable for zero harm.

*"Thank you again for all you did to provide the best health care at my most fragile moment. My life has changed forever."*

*-A grateful Palomar Health patient*



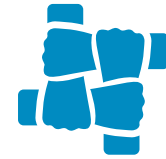
# Providing Safe, Extraordinary Care

## *What You Need to Know*

- Create an inclusive, safe environment for patients, visitors, customers and colleagues.
- Always treat others with compassion, respect and dignity.
- Be honest and fair in all actions.
- Make clinical decisions based on each patient's identified needs, not their financial circumstances.
- Look for opportunities to improve the patient experience.
- Speak up about concerns or suspected misconduct.
- Safeguard patient and business information from inappropriate access and/or use.
- Document and bill appropriately and accurately.
- Use Palomar Health resources responsibly.
- Report potential conflicts of interest.
- Do not accept, offer or give anything of value in exchange for the referral of patients or personal gain.




# TEAMWORK



*Working together toward shared goals*

## TEAMWORK BEHAVIOR STANDARDS

- I treat co-workers with courtesy, honesty and respect.
- I am a team player and work collaboratively toward solutions to help others, including those outside of my department.
- I speak highly of others, promoting their strengths rather than talking negatively about their character.
- I provide my team members honest feedback and address disagreements directly in a respectful manner.
- I take the time each shift to read hospital and system communications (flyers, bulletins, policies, electronic boards, etc.) to know what is expected of me.
- I read and respond to emails and calendar requests in a timely manner and attend mandatory staff meetings.



*“Since my arrival, the patient care at PMC Poway hospital was incomparable due to the competency and kindness from the nursing staff.”*

*-A grateful Palomar Health patient*



# Employee Responsibility

**At Palomar Health, we maintain the highest professional and ethical standards when conducting business and providing extraordinary care.**

All employees are required to:

- Read our Code of Conduct and understand how it applies to you.
- Demonstrate behavior consistent with our Code of Conduct and Palomar Health's procedures in your daily work.
- Ask questions and report issues.

Your adherence to our Code of Conduct will be evaluated as part of your performance reviews.

## OUR LEADERSHIP PROMISE

Our leaders are expected to:

- Create a culture that promotes the highest standard of ethics and compliance.
- Encourage employees to raise concerns and propose ideas.
- Ensure that no one is subject to retaliation for reporting a suspected violation of law or Palomar Health procedure.
- Take prompt action when a potential violation arises.

## *Culture of Safety: Every Patient, Every Time*

We all contribute to the patient experience. Our written procedures support a culture of safety for our patients and staff by defining standardized practices. Your co-workers and the communities that we serve are counting on you to live these procedures every day, for every patient, every time. It is everyone's responsibility to speak up – and Stop the Line – in the event of non-compliance with procedures or if there is any potential for patient harm.



# Reporting Compliance Issues

At Palomar Health, we report concerns and suspected misconduct that could violate state or federal laws, Palomar Health policies and procedures or the Code of Conduct.

There are several ways to report concerns or suspected violations:



Compliance QR Code



Scan this QR code to conveniently report concerns or suspected violations.



Contact Your Supervisor

You are encouraged to talk to your supervisor about concerns or suspected violations.

Contact Human Resources

**Phone 760.740.6300**

If you cannot speak with your supervisor, Human Resources may be an additional resource. Contact Human Resources if the situation involves inappropriate behavior, harassment, fair treatment, payroll or disciplinary issues.

Contact the Compliance Office

**Phone 442.281.3632**

**Email [Compliance.Officer@PalomarHealth.org](mailto:Compliance.Officer@PalomarHealth.org)**

Contact the Compliance department if the situation involves privacy issues, patient care concerns, fraud, billing concerns or conflicts of interest.

Report Anonymously by Phone

**Values Line 800.850.2551**

This line is not intended to replace your normal reporting process, but it is another resource available to you. The Values Line is staffed by an independent company. Calls are not traced or recorded, and anonymity is protected up to the limits of the law and to the extent possible.

Report Anonymously Online

**Visit [PalomarHealth.org/SpeakUp](https://www.palomarhealth.org/SpeakUp)**

This website allows you to report your concern confidentially. When submitting a report online, you may remain anonymous or identify yourself to be contacted directly by Palomar Health's Compliance department if additional details are needed.

Contact Privacy/Information Security

**Privacy 760.480.7992 or [L\\_PrivacyOffice@PalomarHealth.org](mailto:L_PrivacyOffice@PalomarHealth.org)**

**Information Security 760.291.6555 or [InfoSec@PalomarHealth.org](mailto:InfoSec@PalomarHealth.org)**

Contact the Privacy Office if the situation involves potential unauthorized access, use or disclosure of paper, verbal or non-electronic PHI such as misdirected faxes or documents handed in error. Contact Information Security if the situation involves unauthorized access to electronic systems such as snooping, compromised systems (i.e. viruses or stolen passwords) or lost or stolen equipment.

# Investigation and Resolution

**At Palomar Health, we review and respond to concerns, inquiries and allegations of misconduct promptly.**

If necessary, we take action to:

- Implement changes to prevent a similar violation from happening.
- Correct any billing errors.
- Initiate corrective and/or disciplinary action.
- Notify the appropriate governmental agency.

# Non-Retaliation

**At Palomar Health, we enforce a strong non-retaliation procedure to protect team members or members of the public who report in good faith.**

You must report any actual or suspected behavior that is not consistent with our values.

## CONFIDENTIALITY

We make every effort to maintain the anonymity of the reporting individual.

We will keep all reports confidential to the extent allowed by law or policy.

# Disciplinary Action

Violations of the Code of Conduct, or a Palomar Health policy or procedure, may result in counseling and/or disciplinary action, up to and including termination.

## *Just Culture*

We align with the principles of “Just Culture” to build an environment of safety. A Just Culture defines three types of errors:

1. Error because of human factors (i.e. fatigue, equipment failure, system failures)
2. At-risk behavior that differs from standards (i.e. work-arounds)
3. Reckless behavior

If an error occurs, these definitions guide the actions of management to respond to the incident fairly.

## *Good Faith Reporting*

Q: I have serious concerns that a co-worker is violating a Palomar Health procedure. Will I get in trouble if I report my concern and I am wrong?

A: No. We prohibit retaliation against individuals who report in good faith. Good faith reporting means that you have a strong belief that a potential violation has occurred and delivering all the facts you know.



# SERVICE

*Serving others and our community*

## SERVICE BEHAVIOR STANDARDS

- I treat everyone as the most important person I will see today and strive to exceed their expectations.
- I follow the 10/5 rule: acknowledging someone at 10 feet away with a smile and saying "hello" at 5 feet away.
- I help lost guests and new employees by escorting them to their destination.
- I anticipate patients' needs, respond quickly and always ask, "Is there anything else I can do for you?"
- I value the diversity of our patients and customers and show sensitivity to others' needs.
- I promote a safe and clean environment by removing trash, eliminating clutter and keeping equipment in working order.
- I always use AIDET® (Acknowledge, Introduce, Duration, Explanation and Thank You).

*"Everyone my wife and I came in contact with seemed to bend over backward to make sure we were happy and comfortable."*

*-A grateful Palomar Health patient*



# Safety, Health and the Environment

**At Palomar Health, we are committed to a safe, drug and alcohol free work environment.**

You are required to:

- Know how Palomar Health safety procedures apply to your job.
- Immediately notify your supervisor if you identify a situation or safety hazard presenting a danger to yourself or others.
- Smoking is only allowed in designated areas.
- Complete mandatory training.
- Report to work free from the influence of drugs, legal or illegal, that may affect your ability to safely perform your job responsibilities.
- Immediately notify your supervisor if you observe an individual who appears to be impaired.



We make an effort to reduce our impact on the environment by:

- Utilizing resources appropriately and efficiently.
- Recycling when possible.
- Following all requirements for the handling, storage and disposal of hazardous materials.

# Workplace Conduct and Employment Practices

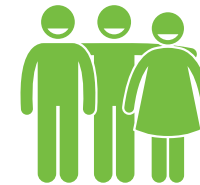
**At Palomar Health, we embrace diversity.**

A diverse workforce enables us to meet the needs of our diverse patient population and community.

Palomar Health is an equal opportunity employer and does not discriminate based on sex, race, religion, color, gender, national origin, ancestry, physical or mental disability, marital status, age, sexual orientation, veteran status or any other factor protected by federal, state or local law.

**At Palomar Health, we are committed to maintaining a work environment that is free from harassment, discrimination and retaliation.**

We do not tolerate behavior that is disrespectful, abusive, harassing or coercive towards co-workers, customers, patients, visitors or community members. If you believe you may have observed or experienced discrimination, harassment or violence at Palomar Health, immediately report the incident to your supervisor and/or Security.



Examples of such behavior are:

- Bullying or making degrading jokes, comments or nicknames.
- Unwanted sexual advances, invitations, comments, posts or messages.
- Retaliation for reporting or threatening to report harassment.
- Acts and/or threats of violence.
- Possession of weapons on Palomar Health premises except as authorized.



# COMPASSION



*Providing comfort and care*

## COMPASSION BEHAVIOR STANDARDS

- I demonstrate respect, dignity and worth to every person with my positive words, my tone of voice and my body language.
- I care for patients the way I want my family members and friends to be cared for. I treat guests as I want my family treated.
- I strive to make every experience a positive one by listening and communicating to patients, families, customers and one another with care.
- I display kindness and offer help without being asked. I know rudeness is never acceptable.
- I go above and beyond ordinary care to meet the personal needs of those we serve, remembering it is the little things that provide comfort, safety and reassurance.
- I involve patients as active participants in their care, honoring their expertise and knowledge of their personal health.



# Patient Rights

**At Palomar Health, we treat our patients with respect and dignity.**

This means:

- We help patients exercise their rights, such as the right to privacy, to receive care free from discrimination and to file a grievance.
- We provide patients with the necessary information to make informed health care decisions and respect their right to refuse treatment.
- We help patients understand any financial assistance available to them.
- We honor each patient's right to visitation. Patients are informed of the reason for any restriction or limitation of visitors.

# Admissions, Transfers and Continuity of Care

**At Palomar Health, the decision to admit, discharge or transfer a patient is based solely on the patient's clinical needs.**

This means:

- We continually evaluate that the appropriate standards of care are met.
- We provide care regardless of race, religion, gender, gender identity, national origin, age, disability, sexual orientation, payer source or ability to pay.

## *Did You Know?*

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) defines patients' rights related to their own health information. These include the right to:

- Receive a Notice of Privacy Practices.
- Inspect and request a copy of their medical record.
- Request amendments to their medical record.
- Obtain an accounting of disclosures of their protected health information.
- File a privacy complaint.

## *Did You Know?*

EMTALA stands for Emergency Medical Treatment and Labor Act. This means that in an emergency situation or if a patient is in labor, we do not delay medical screening or any necessary stabilizing treatment to ask about the individual's method of payment or insurance status.



# TRUST

*Delivering on promises*

## TRUST BEHAVIOR STANDARDS

- I earn respect by keeping promises, fulfilling expectations and holding myself accountable.
- I am honest with others and respond truthfully, with the best interest of the patient at heart.
- I listen to others' input before rushing to judgment.
- I speak up to report errors as well as patient safety and environmental concerns. I focus on improvement rather than blame.
- I safeguard patient confidentiality and never discuss private information in public places.

*"You definitely hired the right people. Everyone I met was professional and very polite."*

*-A grateful Palomar Health patient*





# Quality of Care

**At Palomar Health, we strive to provide the extraordinary care to all of our patients.**

To ensure that every patient who receives extraordinary care, we:

- Regularly monitor patient outcomes, quality metrics and patient satisfaction scores.
- Identify ways to improve the quality of care we provide.
- Report any safety or quality of care concerns.
- Take the necessary steps to prevent future incidents.

# Qualified Caregivers

**At Palomar Health, we employ and contract with qualified individuals and entities.**

It is critical that employees, contractors and affiliated physicians maintain the required credentials to perform their job.

We do not hire, contract with or bill for services provided by individuals or entities that:

- Are excluded or ineligible to participate in federal or state healthcare programs.
- Are debarred by the Government Services Administration (GSA).
- Have been convicted of a crime involving government business.

Employees, contractors and affiliated physicians are required to notify management should they become excluded or otherwise ineligible to participate in federal or state healthcare programs.

# Information Technology

Much of our business today is created and stored on electronic systems. To safeguard information from unauthorized access, you are required to:

- Protect your passwords from use by another person.
- Log off or "Lock" the computer when you leave it unattended or are finished using it.
- Access the 'minimum necessary' information to perform your assigned job duties.

- Access and use email and the Internet in line with our usage standards.
- Save all information to the appropriate location.

You are responsible for all activity, including Internet activity, performed using your user ID and password. All software used or downloaded to any Palomar Health computer must be approved in advance by Information Security.

## *Report Lost or Stolen Devices*

If a laptop, computer or mobile device is lost or stolen, it must be reported within 24 hours to both Palomar Health Security and the Information Security Office.

## *Social Media*

Employees, contractors, vendors and volunteers are prohibited from posting any proprietary business material, such as business or marketing plans, or confidential patient health information, including photos of patients or patient information, online.

# Confidentiality and Privacy

## At Palomar Health, we protect confidential patient and business information.

In healthcare, we collect sensitive information. To protect our patients:

- Examinations, consultations and treatment should be carried out discreetly.
- Patient information should never be discussed in public areas or with anyone who is not directly involved in the patient's care.
- Medical records are retained and destroyed in accordance with the law and Palomar Health procedure.

Potential privacy violations may be reported by calling the Privacy Office at **760.480.7992**, emailing the Privacy Department at **L\_PrivacyOffice@PalomarHealth.org** or calling the Values Line anonymously at **800.850.2551**.

## Did You Know?

It is appropriate to access a patient's record to:

- ✓ Provide care to the patient.
- ✓ Accurately bill the patient's insurance company.
- ✓ Review the quality of care provided to the patient.

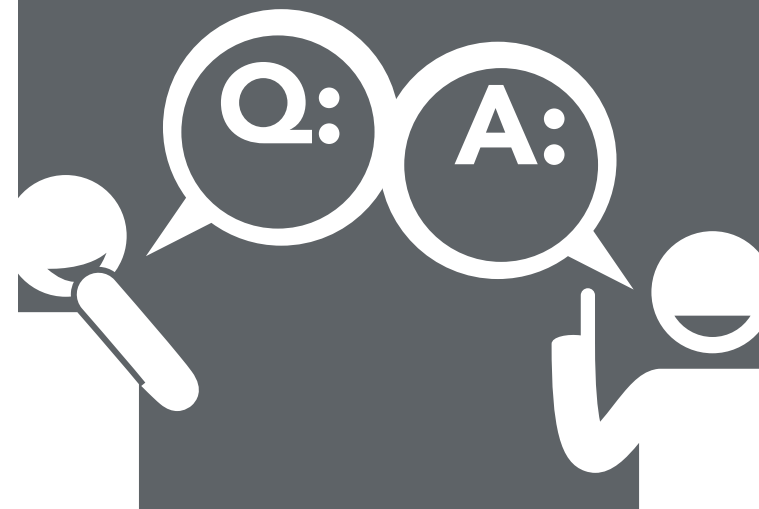
It is not appropriate to access a patient's record to:

- ✗ Satisfy curiosity.
- ✗ Follow the care of a family member or friend.
- ✗ Acquire demographic information, such as telephone numbers or mailing address, of co-workers or other patients for which you are not providing care.

## Breach of Protected Health Information

**Q.** I accidentally faxed a patient's laboratory results to the wrong machine. What should I do?

**A.** Anytime you accidentally provide a patient's protected health information to an unintended recipient, you need to notify your manager and the Privacy Office immediately. Palomar Health has legal obligations that it must perform in these situations, including a report to the state and to the patient whose information was breached.



# INTEGRITY

*Doing the right thing for the right reason*

## INTEGRITY BEHAVIOR STANDARDS

- I do the right thing—whether or not anyone is watching.
- I demonstrate positive values, ethical behavior and moral conduct. I choose acts that show respect.
- If I make a mistake, I admit it and learn from the situation so that I won't make the same mistake again. Then, I move on.
- I am fiscally responsible by not wasting hospital time, resources or equipment. I act like an owner and treat company resources as if they are my own.
- I uphold Palomar Health's Code of Conduct, dress code, policies and procedures; and speak up when I notice others do not.
- I ensure the privacy and validity of all medical records, correspondence and confidential conversations.

"Not only was the lab technician who drew my blood professional, but she made sure all of us in the waiting room had the right paperwork and that we were in the right office. She even went further by helping those who were not."

*-A grateful  
Palomar Health patient*




# Conflicts of Interest

## At Palomar Health, we disclose potential conflicts of interest.

The disclosure of potential conflicts of interest ensures that decisions at Palomar Health are made free from personal gain.

Questions about compliance: Refer to the Compliance Program document or contact the Compliance Team.



What does  
*"conflict of  
interest"* mean?  
What are some  
examples?

"Conflicts of interest" are situations in which financial or other personal considerations may compromise, or appear to compromise, your ability to make objective decisions while performing your job duties. It applies to all employees, contractors and volunteers.

### Examples of Potential Conflicts of Interest:

- Employment or financial interest in a company that conducts business, or wishes to do business, with Palomar Health.
- Outside jobs or positions that conflict with or distract from your work at Palomar Health.
- Hiring or contracting with a family member or friend to provide goods and/or services.
- Making business decisions that could benefit family or friends at the expense of Palomar Health.

All potential conflicts of interest must be reported to your supervisor.

# Gifts and Entertainment

**At Palomar Health, we do not solicit or accept gifts from any person or entity that does business or seeks to do business with Palomar Health.**

This applies to employees, volunteers, contractors and their immediate family members. A "gift" is any form of payment or other benefit given to you.

## *Questions About a Gift?*

Refer to the "Conflicts of Interest, Commitment and Gifts" procedure or refer to the Compliance Program document.



**Here is a road map for navigating the most common situations:**

### **Gifts from Grateful Patients**

If a patient wishes to send a gift, encourage them to express their gratitude by donating to the Palomar Health Foundation, sending a letter to Administration or completing the Press Ganey survey (when possible).



### **Gift Giving**

To avoid the gifting of public funds, Palomar Health must receive equal value whenever its resources are used. This includes time, equipment, materials, supplies and facilities.



No employee, volunteer or contractor is permitted to give a gift on behalf of Palomar Health to induce a referral of any patient to Palomar Health.

### **Items That Are Not Considered Gifts**

- Advertising materials such as a mug or pen where the name, logo or other information about the person or business is permanently marked.
- Personalized plaques, trophies or awards that are routinely given to individuals and organizations outside of Palomar Health.
- A ticket or pass for which the recipient performs a ceremonial role or function on behalf of Palomar Health.
- Meals or other food items provided by a contractor during contractually obligated training that occurs at Palomar Health.



# Documentation, Retention and Disposal

**At Palomar Health, we maintain accurate and complete medical and business records.**

We depend on accurate and reliable information to make responsible business and clinical decisions.

Medical and business documents are retained or destroyed in accordance with the law and Palomar Health's policies and procedures.

In particular, we rely on patient medical records in order to properly bill for the services and care provided.

Anyone who documents in the patient's medical record is responsible for providing accurate and timely documentation of the care provided.

# Coding and Billing

**At Palomar Health, we follow our coding and billing procedures in order to ensure that our bills are accurate and comply with all applicable local, state and federal laws.**

This means:

- We are committed to preparing and submitting accurate and complete claims.
- We bill only for services that are provided and have the supporting documentation.
- We report any behaviors or requests that differ from accepted billing practices.

# Organizational Assets

**At Palomar Health, we use organizational resources responsibly.**

As a public hospital, we have a duty to use resources appropriately.

This means we are responsible for:

- The proper expenditure of Palomar Health's funds.
- Using supplies, equipment and property bought and owned by Palomar Health for business purposes only.

## *What is the False Claims Act?*

The False Claims Act (FCA) prohibits any person or organization from knowingly submitting false claims to the federal government, including Medicare.

Examples of possible violations of the FCA include:

- ✘ Billing for services that were not provided.
- ✘ Recording or processing any information inaccurately (i.e. changing a beneficiary name).
- ✘ Charging for services that were not medically necessary.
- ✘ Coding for services that are more expensive than the services that were actually provided.

# Physician Relations

**At Palomar Health, we carefully review relationships with physicians and other health care providers for compliance with Physician Self-Referral and Anti-Kickback laws.**

All decisions regarding patient care should be made based on what is best for the patient. Any payments or other benefits provided to physicians are not based on the volume or value (either directly or indirectly) of any referrals. Palomar Health prohibits accepting, offering or giving anything of value in exchange for the referral of patients or any patient-related services.

# Customer and Business Associate Relations

**At Palomar Health, we expect consultants, contractors, vendors and suppliers who work in a Palomar Health facility or on behalf of the organization to honor and abide by the organization's policies, procedures and all applicable portions of the Code of Conduct.**

Our relationships with consultants, contractors, vendors and suppliers are managed in a manner that is free from conflicts of interest and consistent with applicable laws and ethical business practices. Anyone negotiating agreements on behalf of Palomar Health has a responsibility to hold the organization's interests above all other entities and report any efforts to inappropriately influence business activities.

# Media Communications

**Any employee contacted by the media should refer that individual to:**

**Bianca Kasawdish**  
Vice President of Public Relations  
Bianca@TeamInnoVision.com

## *Did You Know?*

Physician Self-Referral and Anti-Kickback laws were created to prevent inappropriate financial incentives from influencing medical decisions.

Criminal, civil and monetary penalties can be imposed on individuals or organizations that offer kickbacks (money, gifts etc.), as well as those that accept them.





Contact the Compliance  
Department via email at  
**Compliance.Officer@PalomarHealth.org**  
or by calling **442.281.3632**.

*Have  
Questions?*

**CALL THE  
VALUES LINE:**

800.850.2551

**REPORT ONLINE:**

**PalomarHealth.org/SpeakUp**

*Speak Up!*



*Scan to report  
concerns or  
issues!*

**CERTIFICATION**

All employees must acknowledge they have received this Code of Conduct and agree to follow its standards and Palomar Health policies and procedures.

**Board of Director Approved 3.13.2023**