



Code of Conduct and Ethics

Southcentral
Foundation



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MESSAGE FROM THE PRESIDENT/CEO

Thank you for your careful review of Southcentral Foundation's Code of Conduct and Ethics.

The first few pages of this booklet cover a general overview of Southcentral Foundation, the purpose of our Code of Conduct and Ethics, how to use it, and our varied commitments. I would like to affirm the importance of our Shared Responsibility and Commitment to Quality, and how these key SCF goals relate to our Code of Conduct and Ethics.

SCF's Nuka System of Care has been heralded internationally as one of the most innovative approaches to health care. We have earned a reputation for providing world-class services and for our commitment to the highest professional standards. Compliance with all applicable laws, policies and procedures, and standards for behavior, as described within these pages, is fundamental to SCF's success.

All employees and workforce members, as well as the board of directors, vendors, and contractual partners are required to adhere to SCF's Code of Conduct.

What I appreciate about the Code of Conduct and Ethics is that it provides clarity and assistance for making choices when confronted with difficult decisions.

If any part of the Code of Conduct and Ethics is unclear to you, or if you have questions or concerns about a situation you are facing, there are a number of ways described within the Code to seek assistance. The SCF Employee Compliance and Ethics Hotline is available to you 24 hours a day, seven days a week.

Leadership continues to maintain an open-door policy as part of our corporate compliance program. All managers are expected to be ready and willing to listen to concerns, questions, or suggestions regarding the Code of Conduct and Ethics or any issue. Please be assured that no retaliatory action will



be taken against anyone for reporting a compliance problem or a concern in good faith.

The way we integrate our Code of Conduct and Ethics into our everyday work makes a difference for customer-owners and the Alaska Native Community. Thank you for your continued commitment and dedication.

Sincerely,
Southcentral Foundation

Katherine Gottlieb, MBA, DPS, LHD
President/CEO

PURPOSE OF THE CODE OF CONDUCT AND ETHICS



Back row, left to right: Dr. Terry Simpson (Director), Charles Anderson (Vice Chairman), Roy Huhndorf (Director), Thomas Huhndorf (Director); Seated, left to right: James Segura (Chairman), Karen Caindec (Secretary/Treasurer), Charles Akers (Director)

This Code of Conduct and Ethics is developed with employee input and is approved by SCF's President/CEO and Board of Directors. The Code reflects SCF's Vision, Mission, and Goals, and helps to ensure all workforce members and stakeholders have a clear understanding of the business, professional, and personal ethics expected in the workplace.

Our Code of Conduct and Ethics reflects our values, and provides guidance to all SCF workforce members to assist us in carrying out our daily activities with appropriate ethical and legal standards.

The Code of Conduct and Ethics applies to everyone, whether serving as a board member, employee or doing business with, or on behalf of, SCF. These obligations apply to relationships with all stakeholders, including customer-owners, families of customer-owners, third-party payers, contractors, consultants, and each other.

Ethical Behavior

Professional and ethical conduct fosters trust and mutual respect amongst employees, business partners, stakeholders, community, and customer-owners.

We are expected to speak truthfully and act in accordance with SCF's expectations regarding honesty and integrity.

HOW TO USE THE CODE OF CONDUCT AND ETHICS

If at any time there is a question or concern regarding information included in the Code of Conduct and Ethics, you may ask a supervisor, manager, director, SCF Corporate Compliance, Human Resources, Quality Assurance, or General Counsel.

The SCF Code of Conduct and Ethics may be used as a resource to apply ethical and legal standards and answer the following questions:

- 🐟 Are my actions or decisions consistent with SCF's Vision, Mission, and Goals?
- 🐟 Are my actions or decisions in compliance with the law, policies, procedures, and standards?
- 🐟 Can I explain my actions or decisions to SCF, family, friends, co-workers, and customer-owners?
- 🐟 Would my actions or decisions harm SCF's reputation in the community?
- 🐟 Who should I contact if I believe a violation has occurred?
- 🐟 Who can help me if I still have questions?
- 🐟 How do I contact SCF's Corporate Compliance Officer?

Contact Information:

Individuals may contact SCF's Corporate Compliance Officer directly at [\(907\) 729-5711](tel:(907)729-5711) or Corporate Compliance at [\(907\) 729-4200](tel:(907)729-4200). The SCF Employee Ethics and Compliance Hotline at [1 \(888\) 309-1715](tel:(1888)309-1715) or online at <https://scf.alertline.com/gcs/welcome>.

The hotline operators are available 24 hours a day, seven days a week. Individuals may report compliance concerns anonymously.



1 VISION, MISSION, GOALS

Vision

A Native Community that enjoys physical, mental, emotional and spiritual wellness.

Mission

Working together with the Native Community to achieve wellness through health and related services.

Nuka System of Care

SCF's Nuka System of Care is the name given to the whole health care system created, managed, and owned by Alaska Native people. Many cultures around the world use the word Nuka. Some of the common meanings include honor, strength, big living things, dignity, love, generosity, and support; these are many of the things that make up who we are.

The relationship-based Nuka System of Care is comprised of organizational strategies and processes; medical, behavioral, dental, and traditional practices; and supporting infrastructure that work together – in lifelong relationship – to support wellness. By putting relationships at the forefront of what we do and how we do it, the Nuka System of Care will continue to develop and improve for future generations.





Goals

Shared Responsibility

We value working together with the individual, the family and the community. We strive to honor the dignity of every individual. We see the journey to wellness being traveled in shared responsibility and partnership with those for whom we provide services.

Commitment to Quality

We strive to provide the best services for the Native Community. We employ fully qualified staff in all positions and we commit ourselves to recruiting and training Native staff to meet this need. We structure our organization to optimize the skills and contributions of our staff.

Family Wellness

We value the family as the heart of the Native Community. We work to promote wellness that goes beyond absence of illness and prevention of disease. We encourage physical, mental, social, spiritual, and economic wellness in the individual, the family, the community, and the world in which we live.

2 LEADERSHIP PRINCIPLES

SCF uses the following principles to guide leadership:

Operate from the strength of Alaska Native cultures and traditions of leadership

Will stand in the gap to align and achieve the mission and vision

Nurture an environment of trust that encourages buy-in, systematic growth, and change

Encourage ownership of responsible, calculated risk taking

Respect and grow the skills of future generations to drive initiatives and improvements

Share and listen to personal life stories in order to be transparent and accountable

Hedge people in by creating a safe environment where spiritual, ethical, and personal beliefs are honored

Improve for the future by learning from the past, giving away credit, and celebrating achievements

Practice and encourage self-improvement, believing there is good in every person



3 OPERATIONAL PRINCIPLES

SCF's operational principles provide guidance from customer-owners when improving systems and developing new programs or services. SCF's Vision, Mission, and Goals emphasize working together with individuals, families, and the community, which means our systems and services are built on RELATIONSHIPS. We believe multidimensional wellness can only occur effectively in a relationship-based system of care designed by and for the customer-owner, when, where, and how they want it.

Relationships between the customer-owner, the family, and provider must be fostered and supported

Emphasis on wellness of the whole person, family, and community including physical, mental, emotional, and spiritual wellness

Locations that are convenient for the customer-owner and create minimal stops for the customer-owner

Access is optimized and waiting times are limited

Together with the customer-owner as an active partner

Intentional whole system design to maximize coordination and minimize duplication

Outcome and process measures to continuously evaluate and improve

Not complicated but simple and easy to use

Services are financially sustainable and viable

Hub of the system is the family

Interests of the customer-owner drive the system to determine what we do and how we do it

Population-based systems and services

Services and systems build on the strengths of Alaska Native cultures

4 CORE CONCEPTS

Core concepts are tools we use in every interaction with customer-owners and each other to create healthy relationships. Through the use of these tools, we become better at communicating and working together to achieve our mission and vision. Employees are expected to understand how these tools affect customer-owner care at SCF and to integrate them in their work. SCF's Core Concepts are:

- W**ork together in relationship to learn and grow
- E**ncourage understanding
- L**isten with an open mind
- L**augh and enjoy humor throughout the day
- N**otice the dignity and value of ourselves and others
- E**ngage others with compassion
- S**hare our stories and our hearts
- S**trive to honor and respect ourselves and others



5 ABOUT SCF

Southcentral Foundation is an Alaska Native nonprofit health care organization established under the Tribal authority of Cook Inlet Region, Inc. in 1982 to improve the health and social conditions of Alaska Native people, enhance culture, and empower individuals and families to take charge of their lives. The seven-member Alaska Native board of directors is the chief policy-making body. Katherine Gottlieb has served as SCF's President/CEO since the board appointed her in 1991. Gottlieb reports directly to SCF's Board of Directors and supervises six divisions, each headed by a vice president who administers the operations and employees for an organization-wide total of more than 80 programs. Under her leadership, SCF has grown from fewer than 100 employees to more than 2,300, and from an annual operating budget of \$3 million to \$380 million.

A wide range of health and wellness services are provided to 65,000 Alaska Native and American Indian people living in the Municipality of Anchorage, Matanuska-Susitna Borough, nearby villages, and the 55 rural villages in the Anchorage Service Unit, an area stretching 107,400 square miles across Southcentral Alaska — from the Aleutian and Pribilof Islands to the Canadian border. In 1998, SCF established the Village Service Management Team, which serves as a liaison between the organization and Tribal representatives from within the Anchorage Service Unit. The members advise SCF's Board of Directors on the health care needs of their villages and help village residents understand what services are available to them.

SCF assumed ownership and management of programs located in the Anchorage Native Primary Care Center in 1998. In January 1999, SCF expanded as it became co-owner and co-manager of the Alaska Native Medical Center, along with the Alaska Native Tribal Health Consortium (a consortium of 15 Alaska Native organizations). The Indian Health

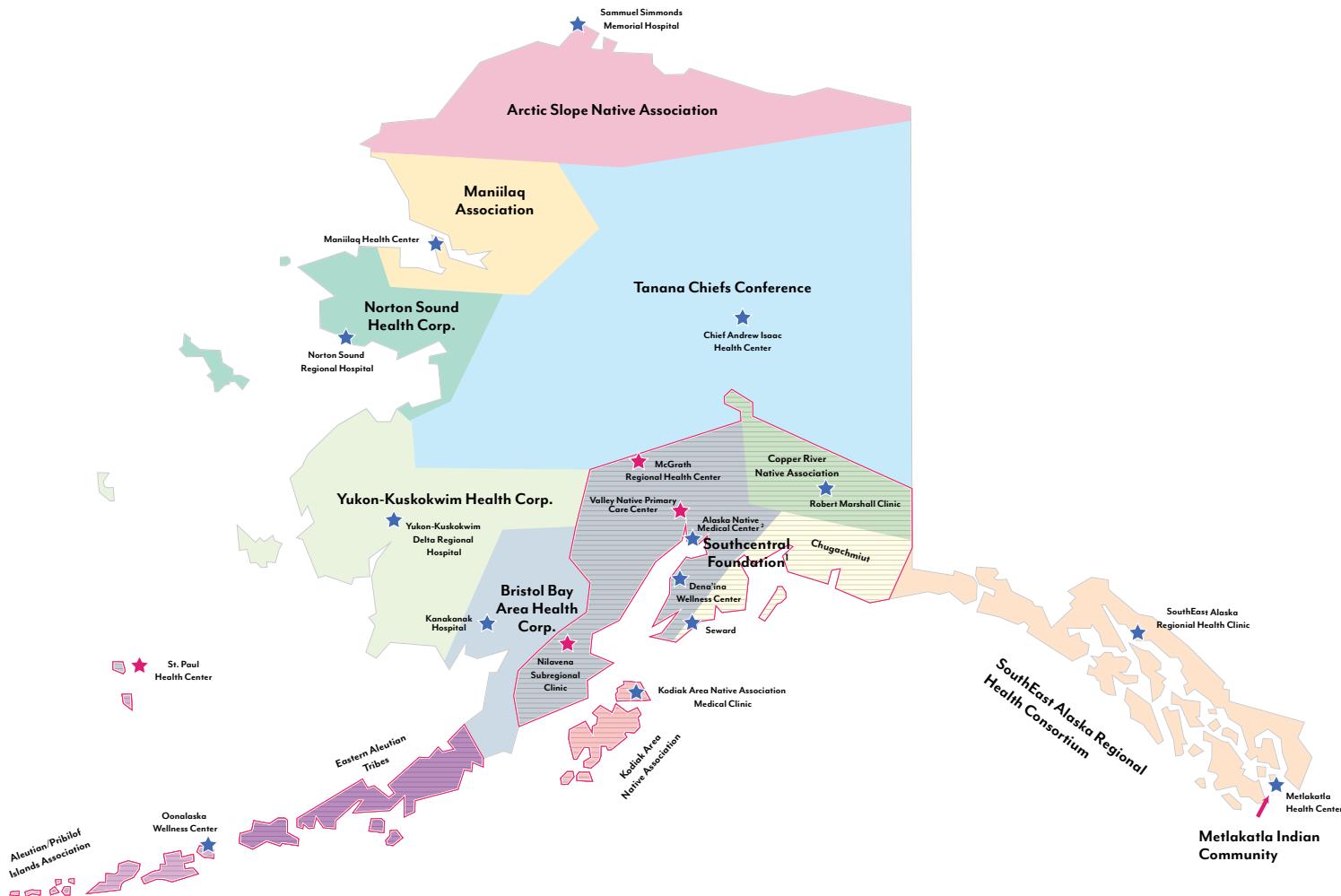
Service previously operated the programs. With this transition, Alaska became the first state in the nation to have all of its health facilities for Native people managed by Native organizations.

The Alaska Native Medical Center offers comprehensive medical services and acute, specialty, primary, and behavioral health care to Alaska Native and American Indian people living in Alaska. The Anchorage Native Primary Care Center is part of the Alaska Native Medical Center, and is known as an example of whole-system transformation. SCF also owns and manages another large primary care center, 13 federally designated community health centers, a community mental health center, and a residential substance use treatment center.

SCF provides a wide range of health and wellness services to 65,000 Alaska Native and American Indian people.

While perhaps best known for its primary care services, SCF's customer-owned, relationship-based Nuka System of Care also offers: pharmacy, outpatient behavioral health, dental and optometry services, substance use treatment, specialized services for youth and Elders, and healing programs such as the Family Wellness Warriors Initiative. Recognized for the Nuka System of Care, SCF is a global leader among health care organizations.

SCF has been selected to receive the Malcolm Baldrige National Quality Award twice in six years, 2011 and 2017. SCF has also partnered with Harvard Medical School (HMS) Center for Primary Care. The Center studied SCF's Nuka System of Care, and offered leadership training and exchanges between the two organizations. HMS participated in SCF's Core Concepts and took part in the Center's InciteHealth initiative, which focuses on health care innovation and primary care redesign.



Alaska Native Health System

Facts

229 Federally Recognized Tribes (Villages)

SCF:

Primary care services in Anchorage, Matanuska-Susitna Valley and the Anchorage Service Unit

ANHB:

Statewide health advocate voice

ANTHC:

Statewide specialty and tertiary health care

Regional Native Corporations

- Arctic Slope Regional Corp.
- NANA Regional Corp.
- Bering Straits Native Corp.
- Doyon Ltd.
- Calista Corp.
- CIRI

- Sealaska Corp.
- Ahtna Inc.
- The Aleut Corp.
- Bristol Bay Native Corp.
- Koniag Inc.
- Chugach Alaska Corp.

Key

- ★ SCF Services Hub
- ★ Regional Health Hub
- **Southcentral Foundation/ Anchorage Service Unit**

1. Also serves Native Village of Eklutna, Ninilchik Village Traditional Council, Seldovia Village Tribe, Chickaloon Village Traditional Council, Knik Tribal Council, and Native Village of Tyonek.
2. ANMC jointly owned and comanaged by SCF and ANTHC.

6 CUSTOMER-OWNERSHIP

Establishment of SCF's Nuka System of Care involved a wide variety of changes; however, there are two primary elements that emerged: customer-ownership and relationships.

With the implementation of the Nuka System of Care, the Alaska Native and American Indian people who SCF serves were no longer referred to as patients; instead they were and are referred to as customer-owners. Patient, as a term, implies a passive participant in the health care process: one who waits for doctors to make decisions about health issues.



The alternative, customer-owner, encourages those receiving care to be customers, owners of their own health, and owners of the health care system by providing feedback that will guide future improvement. There is more to this shift than a change in name; it signifies a substantial change in the relationship between customer-owners and providers.

The Nuka System of Care is continuously changing to reflect the values and priorities of Alaska Native people under the leadership of Alaska Native individuals. As customers and owners of our health care system, our defined needs, goals, and values become the focus of the entire care system.



7 OUR COMMITMENT TO COMPLIANCE AND ETHICS

SCF promotes and maintains a corporate culture that actively demonstrates an ethical tone throughout every level of the organization.

Our compliance program contributes to and supports responsible and sustainable business practices, transparency, quality, innovation, and social responsibility. Our effective compliance program helps to ensure compliance with all applicable laws, regulations, SCF's Code of Conduct and Ethics, policies, and procedures.

Compliance is a shared responsibility. Employees are expected to know and abide by the rules that apply to their area of responsibility.

Reducing Organizational Risk through Compliance

SCF Corporate Compliance supports this Code of Conduct and Ethics as a key component of SCF's compliance program. In addition, Corporate Compliance responds to inquiries, coordinates and conducts reviews and audits, and offers compliance and privacy trainings and education. SCF investigates allegations of violations of SCF policies and procedures, and applicable local, state, or federal law to determine their validity, scope, cause, and seriousness, and ensures corrective actions are taken. SCF supports a culture that encourages open communication and compliance with all applicable policies, procedures, and laws.

The Code of Conduct and Ethics is a key component of the compliance program and acts as a resource to assist and advise employees, customer-owners, partners, and other stakeholders on how to prevent, detect, and correct violations of policies, procedures, and laws.



We commit to:

- Designating a corporate compliance officer who is responsible for effective management of the compliance program and ensuring SCF's compliance program is visible, effective and accountable. The corporate compliance officer has direct access to the SCF Board of Directors and the President/CEO;
- Maintaining open lines of communication by creating an environment where individuals feel comfortable reporting compliance concerns without fear of retaliation;
- Establishing policies and procedures to ensure expectations for appropriate and compliant conduct are clearly communicated;
- Conducting ongoing training and education at the time of hire and annually thereafter. Compliance training is multi-faceted and helps employees understand their obligation to comply with our Code of Conduct and Ethics and the legal requirements that apply to SCF as a health care organization;
- Monitoring and auditing to evaluate our risk areas related to compliance with laws and regulations, Conditions of Participation, contracts, SCF's policies, procedures, and Code of Conduct and Ethics to ensure we are effective in managing compliance risks;
- Responding to allegations of wrongdoing and investigating credible allegations of violations of SCF policies and procedures and applicable municipal, state, or federal law to determine their validity, scope, cause, and seriousness;
- Stopping improper or non-compliant conduct immediately, and mitigating the effects of the improper or non-compliant conduct;
- Developing compliance improvement plans to reduce the likelihood of similar occurrences in the future;
- Enforcing corrective action standards when necessary and ensuring that actions taken are fair, objective, and consistent with SCF's policies, procedures, and Code of Conduct and Ethics, regardless of the individual's position; and
- Maintaining an ethical and compliant culture at SCF by reporting any activity that appears to violate the law, our policies and procedures, or our Code of Conduct and Ethics.



Internal Audit Activities

The internal audit activities are part of SCF's comprehensive compliance program. The internal audit activities will follow established professional standards. The internal audit activities include annual and periodic risk assessments. Risk assessment processes include input from employees across the organization and results are included in the annual strategic planning cycle and incorporated in audit planning processes.

Internal auditors will be granted full and unrestricted access to any and all of SCF records and physical properties. Employees will assist SCF internal auditors. Internal audit will review the results and quality of performance of external auditors and contracted individuals acting on behalf of SCF, who conduct auditing activities.

Internal audit responds to all external third-party payer requests to audit and review clinical, financial, and operational records and supporting documentation as agreed to in the applicable governing agreements, contracts and regulations.

8 OUR COMMITMENT TO COMPLYING WITH CONDITIONS OF PARTICIPATION



We strive to comply with the Conditions of Participation (CoP) and applicable laws governing participation in Medicare, Medicaid, and other third-party payer programs that enable SCF to receive reimbursement from these programs. The CoP outline the legal requirements and professional standards that apply to the work we do. We are responsible for knowing the CoP and how the rules apply to the provision of services, documentation of services, and billing for services for our area of responsibility.

CoP require SCF programs and individuals maintain credentials, certifications, licenses, and required competencies.

CoP prohibit SCF from employing or retaining anyone who has been excluded from participation in government programs or does not successfully pass required background checks in covered positions.

We commit to:

- Knowing the rules, regulations, and Conditions of Participation (CoP) that are applicable to the work we do;
- Cooperating in audits and reviews;
- Complying with Medicare and Medicaid CoP; and
- Billing government payers, commercial insurance payers, and customer-owners accurately, timely, and in compliance with payer billing requirements.



Scenario:

Q: Roger is a customer-owner being seen in the clinic today for a sore throat. During his visit, the provider asks Roger about a recent emergency department visit for chest pain. Roger tells his provider he has never experienced chest pain and has not been to the emergency department for years. What should Roger's provider do?

A: Roger's provider starts by confirming Roger's date of birth and medical record number to ensure he has accessed the correct medical record. Roger's provider sees that the chart notes in Roger's record are for an individual much older than Roger and are clearly documented in Roger's chart in error. The provider is concerned this information may affect the quality of care for both Roger and the individual who was seen in the emergency department. In addition, there may be privacy and billing concerns. Roger's provider reports the privacy and billing concerns to SCF Corporate Compliance and enters the incident into SCF's incident/accident reporting database.

9 OUR COMMITMENT TO COMPLIANCE WITH THE LAW

SCF is committed to complying with all laws and regulations and maintaining ethical behavior in all interactions by establishing and supporting an effective compliance program. We will ensure that SCF complies with all applicable federal and state laws, including laws pertaining to the detection and prevention of fraud, waste and abuse.

The five most important federal Fraud, Waste and Abuse Laws are: 1) The False Claims Act (FCA); 2) The Anti-Kickback Statute (AKS); 3) The Physician Self-Referral Law (Stark Law); 4) The Exclusion Authorities; and 5) The Civil Monetary Penalties Law (CMPL). In addition, Alaska has established a State Medical Assistance Fraud Statute and other fraud and abuse laws that apply to the receipt of state and federal benefits.

We will be familiar with the Fraud, Waste, and Abuse Laws and we commit to complying with these laws. We must all remain alert to the possibilities of fraud, waste and abuse by others. We will promptly report any suspected fraud, waste and abuse through appropriate channels.

No employee will retaliate against another employee who has reported an allegation of fraud, waste, or abuse in good faith. Credible allegations of violations of the law and SCF policy and procedures will be discreetly and thoroughly investigated.

Employees who violate these laws may be subject to corrective actions, up to and including termination, and may be subject to fines and criminal prosecution.

False Claims Act (FCA)

The False Claims Act (FCA) makes it illegal to submit claims for payment that you know or should have known are false or fraudulent. Under the civil FCA, no specific intent to defraud is required. The civil FCA defines "knowing" to include not only actual knowledge but also instances in which a person acts in deliberate ignorance or reckless disregard of the truth or falsity of the information.

Anti-Kickback Statute (AKS)

The Anti-Kickback Statute's (AKS) main purpose is to protect customer-owners and federal health care programs from fraud and abuse, and prohibit certain conduct involving improper payments in connection with the delivery of items or services.

The statute applies where a person offers or makes payments to another person in order to induce referrals or other prohibited conduct. Illegal payments or solicitations of payments include those in cash or in-kind (i.e. goods) made directly or indirectly, and those made overtly or covertly.

SCF prohibits bribes or kickbacks, including a complex array of discounts, rebates, profit-sharing agreements or other business arrangements that would violate federal laws such as the Anti-Kickback Statute.



Scenario:

Q: An SCF dentist, whose husband also has a private dental practice in the community, asks her supervisor if she can refer customer-owners seeking services not provided at SCF to her husband's practice. The supervisor is concerned that this may violate a policy, procedure, or law.

A: The supervisor contacts SCF Corporate Compliance who explains that according to SCF's Conflict of Interest Procedure providers are prohibited from making referrals to any entity in which they or a family member have a financial relationship. In addition, the SCF Fraud, Waste and Abuse (False Claims Act) Policy and Procedure prohibits physicians or dentists from making referrals to an entity with which the physician or dentist, or an immediate family member of the physician, has a financial relationship.

Stark Laws

Stark I and II are federal statutes that prohibit physicians from making referrals to any entity in which they, or an immediate family member, have a financial relationship and which provides certain designated health services. A financial relationship includes, but is not limited to, ownership or investment interest, and compensation arrangements.

SCF prohibits providers from referring customer-owners for health care services to entities in which the provider has a financial relationship that would violate federal laws such as Stark.

Exclusion Authority

The U.S. Department of Health and Human Services, Office of Inspector General (OIG), is legally required to exclude individuals and entities convicted of certain criminal offenses from participation in all federal health care programs. Furthermore, the OIG may, at their discretion, exclude individuals and entities for other reasons, including: the suspension, revocation, or surrender of a license to provide health care for reasons bearing on professional competence; engaging in unlawful kickbacks; and defaulting on a health education loan.

Federal law prohibits SCF from employing or retaining anyone who has been excluded from participation in government programs or does not successfully pass required background checks.

Civil Monetary Penalties Law (CMPL)

The Civil Monetary Penalties Law (CMPL) authorizes the OIG to impose civil money penalties, in addition to exclusion, for various forms of fraud and abuse involving the Medicare and Medicaid programs. Penalties may range from \$10,000 to \$50,000 for each violation, depending on the circumstances.

Alaska Medical Assistance Fraud Statute

The Alaska Medical Assistance Fraud statute encompasses both referrals and kickbacks, in addition to submission of false or fraudulent claims. The law stipulates other violations to include failure to provide records to authorized persons, unauthorized destruction of records, and other violations of Alaska statutes.

Whistleblower Protections

State and federal laws provide protections for employees who, in good faith, communicate with government officials regarding possible illegal behavior. Where such protection is available, retaliation against reporting employees is prohibited.

Mandatory Reporting

Alaska law requires that employees who are mandatory reporters and who suspect a child or vulnerable adult is in danger of abuse, neglect, or exploitation must report to appropriate authorities immediately or no later than within 24 hours.





We commit to:

- 🐟 Presenting claims for payment, or approval, which are complete and accurate;
- 🐟 Promptly reporting any concerns that claims may contain false or fraudulent information;
- 🐟 Prohibiting providers from referring customer-owners for health care services to entities in which the provider has a financial relationship and that could violate federal laws such as Stark;
- 🐟 Prohibiting bribes or kickbacks, including discounts, rebates, profit-sharing agreements, or other business arrangements that would violate federal laws such as the Anti-Kickback Statute;
- 🐟 Prohibiting any employee or person acting on behalf of SCF from receiving payments, gifts, or other favors for the referral of customer-owners or that might influence health care decisions;
- 🐟 Ensuring we do not employ or contract with excluded individuals or entities;
- 🐟 Taking appropriate corrective or disciplinary action to resolve issues when necessary; and
- 🐟 Not retaliating against another who has reported an allegation in good faith.

10 OUR COMMITMENT TO PRIVACY AND CONFIDENTIALITY

We will only share private or confidential information with those individuals or entities that have a need to know and are legally-permitted to receive such information. The information shared will be limited to the minimum necessary for the intended purpose. Communicating confidential information inappropriately, whether inadvertently, intentionally, or negligently may be a breach of confidentiality.

The four most important federal privacy laws are: 1) the Privacy Act of 1974; 2) the Health Insurance Portability and Accountability Act (HIPAA); 3) the Health Information Technology for Economic and Clinical Health (HITECH) Act; and 4) 42 CFR Part 2 Confidentiality of Substance Use Disorder Patient Records. Alaska has established the Alaska Personal Information Protection Act (AK PIPA) that applies to privacy protections.

Privacy Act of 1974

Pursuant to SCF's funding agreement with the Indian Health Service, medical records, financial records, and personnel records acquired, generated, or maintained by SCF are treated as federal records, so that they must be disclosed in compliance with the Privacy Act of 1974, 5 U.S.C. §552a(b).

Health Insurance Portability and Accountability Act (HIPAA)

HIPAA is a federal law addressing aspects of the use and disclosure of protected health information maintained by SCF. HIPAA gives customer-owners' rights to their Protected Health Information and specifies administrative, physical, and technical safeguards to assure the confidentiality, integrity, and availability of electronic Protected Health Information.

Health Information Technology for Economic and Clinical Health (HITECH) Act

The HITECH Act addresses the privacy and security concerns associated with the electronic transmission of health information, in part, through several provisions that strengthen the civil and criminal enforcement of the HIPAA rules.

42 CFR Part 2 Confidentiality of Substance Use Disorder Patient Records

The federal statute that governs confidentiality for people seeking treatment for substance use disorders from federally assisted programs. This law generally requires a federally assisted substance use program to obtain a customer-owner's consent before releasing information to others.

Alaska Personal Information Protection Act (AK PIPA)

The Alaska Personal Information Protection Act (AK PIPA) requires the protection of identifiable information that consists of a combination of an individual's name and social security number, driver's license number, credit card number or other passwords, personal identification numbers or other access codes for financial accounts.



Examination and Treatment of Minors

State statute permits minors to consent for their own medical and dental treatment under certain circumstances, including but not limited to:

- 🐟 A minor who is living apart from their parents or legal guardian, and managing their own financial affairs, regardless of the source or extent of the income;
- 🐟 If the parent or legal guardian of the minor cannot be contacted, or if contacted is unwilling to either grant or withhold consent, the provider will counsel the minor, keeping in mind the interests of the minor and the parent, guardian or family unit;
- 🐟 A minor who is the parent of a child, may consent for their own care, and the care of their child;
- 🐟 A minor seeking treatment for the diagnosis, prevention, or treatment of pregnancy, or sexually transmitted infections (STI); and
- 🐟 Providers may rely in good faith on the representations of the minor.

Notice of Privacy Practices

SCF has established a Notice of Privacy Practices (NoPP) that explains how we may use and disclose customer-owner health information. It also describes customer-owner's privacy rights, and special rules for customer-owners of SCF's alcohol, drug prevention and treatment programs, and SCF's responsibilities in using and disclosing customer-owner health information.

- Receive a copy of SCF's Notice of Privacy Practices;
- Ask questions about any information contained in SCF's Notice of Privacy Practices;
- Request restrictions or limit certain uses and disclosures of their own protected health information;
- Request confidential communications;
- Request to view and obtain a copy of their health record;
- Request to amend their record;
- Request to revoke or cancel prior authorizations to use or disclose their health information; and
- Receive an accounting of disclosures.

We commit to:

- Maintaining records, results of tests, diagnoses, and other materials in our possession in strict confidence, and in accordance with applicable laws;
- Obtaining written authorization from the customer-owner, parent, or legal guardian and complying with applicable laws before disclosing protected health information;
- Conducting case discussions and consultations privately and discreetly;
- Reporting any violations of applicable privacy laws to Corporate Compliance immediately, including unauthorized access to protected health information;
- Seeking guidance from department leadership, Corporate Compliance, Quality Assurance, or General Counsel if questions arise regarding an obligation to maintain the confidentiality of information or the appropriateness of releasing information;
- Accessing only the minimum necessary information needed to do our jobs;
- Following normal procedures to obtain our own protected information;
- Protecting and safeguarding mobile devices, such as smart phones, cameras, tablets, or laptops from loss or theft, and preventing these devices from being used to inappropriately access or transmit protected, confidential information;
- Auditing SCF employee access to electronic health information to ensure that information is kept secure; and
- Issuing corrective actions for unauthorized access to information, up to and including termination.



Scenario:

Q: Amanda works at the *Benteh Nuutah* Valley Native Primary Care Clinic. One day her cousin Cheryl asks Amanda if she can look in Cheryl's medical record for laboratory test results. Cheryl's provider at the Anchorage Native Primary Care Clinic ordered the tests for Cheryl last week. Cousin Cheryl tells Amanda it is okay, because Cheryl is giving Amanda permission, and after all, it is Cheryl's record. What should Amanda do?

A: Amanda recalls from privacy training that employee's access to a customer-owner's medical record is limited to job related purposes only. Since Cheryl is not seen at the Valley clinic where Amanda works, it would not be appropriate for Amanda to access this information for this purpose. Amanda explains this limitation to her cousin and refers her cousin to her provider in Anchorage for the test results.

11 OUR COMMITMENT TO QUALITY CARE

SCF is committed to providing excellent, high-quality health care and related services. Our goal is to ensure consistent delivery of quality care using quality indicators and continuous improvement activities that are monitored on an ongoing basis through the quality assessment and improvement processes.

Customer Experience RELATE Standards

SCF values customer-owners and strives to ensure a positive experience.

Here are some ways that we can walk with customer-owners on their journey to wellness:

R espect: Employees are friendly and make you feel valued.

E ngage: You are greeted in a warm and welcoming way.

L isten: Providers are attentive and encourage you to ask questions.

A dvocate: Options for next steps in your care are discussed.

T hank: Employees are polite and make you feel appreciated.

E ncourage: You are offered the opportunity to share feedback about your experience.





Scenario:

Q: Roy just graduated from the SCF Administrative Support Training Program and is working at the front desk in the Anchorage Native Primary Care Center. He is excited about working at SCF and wants to learn everything he can about his new job. He is approached by a man looking for his girlfriend and wants to know if this is the right clinic. When Roy explains that he cannot disclose the location of the man's girlfriend, the man becomes angry and starts yelling. Roy's supervisor is not in the office to help him. What should Roy do?

A: The SCF Customer Experience RELATE Standards helps Roy handle the situation. First Roy can “respect” the man by being polite and courteous and introducing himself. Roy can then use a friendly and inviting tone to “engage” the man and state his understanding of the man’s frustration. Roy should be present and actively “listen” to the concerns of the man and demonstrate his listening by acknowledging the reason he is angry. Next, Roy can explain the reasons why he is unable to disclose the location of the man’s girlfriend and share with him the next steps he is able to take to support and “advocate” for him, such as contacting the girlfriend to receive permission to disclose her location to the man. Roy should then “thank” the man for his patience, and “encourage” him to avoid this situation in the future by letting him know that, if she chooses, his girlfriend can sign an authorization for the release of information form so that the man can receive her appointment information or location.

Accreditation and Surveys

We must work with all accrediting, certifying, licensing, and external oversight agencies in a direct, open, and honest manner. We must never mislead a surveyor or auditor, directly or indirectly.

We commit to:

- Responding to all accrediting, certifying, licensing, and oversight agencies with openness and accurate information;
- Never concealing, destroying, or altering documents, or making false or misleading statements to the regulatory representative during or in preparation for a survey or inspection;
- Be transparent to demonstrate quality and commitment to compliance;
- Recognizing that there are a variety of approaches to, and purposes for, external quality evaluation, and the principles of regulatory and accreditation bodies are valued by SCF;
- Never attempting to cause, encourage, or coerce a colleague to provide inaccurate information, or to personally obstruct, mislead, or delay the communication of information or records in relation to a possible violation of law; and
- Notifying the appropriate corporate department when an individual becomes aware of an on-site visit by an external agency or when an over-site agency is on site, such as, Joint Commission, CARF, DEA, or Office of Civil Rights.





Scenario:

Q: The Drug Enforcement Agency (DEA) arrives at the clinic to audit Suboxone prescriptions. During the on-site audit, it is discovered that the provider who usually prescribes Suboxone is on personal leave. The covering provider does not have the proper DEA clearance to prescribe Suboxone. What should happen next?

A: Immediately notify SCF Corporate Compliance that the DEA is on-site. A Corporate Compliance team member will assist with the audit. Providers must receive specialized training and Drug Enforcement Agency (DEA) authorization prior to prescribing Suboxone. While the DEA considers this issue to be the responsibility of the provider, Corporate Compliance will assist the provider to obtain the proper authorization and respond to any identified deficiencies noted by the DEA.



Emergency Medical Treatment and Active Labor Act (EMTALA)

Any individual who presents to the ANMC Emergency Department or Labor and Delivery is entitled to a medical screening examination and stabilizing treatment. These individuals also have the right to refuse a medical screening examination or appropriate stabilizing treatment, in accordance with EMTALA.

If the individual refuses a medical screening exam, SCF has, SCF has the obligation to take reasonable steps to ensure the individual understands the risk and benefits of such a decision, and to secure a written refusal from the individual or their legal guardian.

If an individual presents to another SCF location with a medical emergency the Emergency Medical Response and First Aid Procedure is implemented to ensure the individual is transported to the nearest appropriate emergency department by emergency medical service immediately.

Employees working in areas where EMTALA applies are required to complete EMTALA training upon hire and annually thereafter.

We commit to:

- Complying with the Emergency Medical Treatment and Active Labor Act (EMTALA);
- Providing an appropriate medical screening exam to all individuals who come to the Emergency Department requesting an examination; and
- Treating, stabilizing, or transferring individuals following EMTALA policies, procedures, and regulations.



Health and Safety

SCF is committed to protecting the safety and welfare of employees, visitors, and customer-owners. Employees are encouraged to report health and safety concerns to SCF Security.

Privacy matters should be reported directly to Corporate Compliance. They should not be reported in the SCF electronic incident/accident reporting tool.

We commit to:

- Providing a safe environment for customer-owners, employees, and visitors;
- Complying with applicable safety and health regulations, licensing requirements, and accreditation standards;
- Providing initial and periodic training to promote safe work practices, mitigate personal or property damages because of an environmental or workplace mishap, and providing for the prompt and proper reporting of each incident;
- Resolving questions and concerns to the best of our ability and within our purview;
- Reporting any injuries or incidents promptly that involve customer-owners, employees, or visitors in accordance with applicable procedures and laws;
- Striving to provide quality care efficiently, timely, and by professionals with appropriate and current credentials, in appropriate settings; and
- Responding to and supporting SCF during emergencies and disasters, as appropriate for your position.

Customer-Owner Rights and Responsibilities

SCF provides services in a way that shows respect and support of customer-owner rights by involving them in decisions about their care, treatment, and services to help build relationships and ensure customer-owners feel supported. The customer-owner rights and responsibilities are guidelines to our daily work and set standards for services we provide. Employees should know and abide by customer-owner rights and encourage customer-owner involvement.

SCF customer-owners have the right to:

- Considerate and respectful care, treatment, and services;
- Request clear communication, which includes use of interpreters if necessary;
- Be informed of their rights and responsibilities before the initiation of care, treatment, and services;
- Receive all information about their health, care, treatment, and services;
- Participate in all decisions about their care, treatment, and services;
- Participate and receive information about present and future care, treatment, and services;
- Give informed consent by understanding the benefits, risks, and options for an alternative treatment plan, and give permission for services received when possible when a consent is used;
- Refuse care, treatment, and services, and receive information explaining the consequences of refusing care;
- Privacy and confidentiality in accordance with the SCF Notice of Privacy Practices;
- Ask about any relationship that program(s) and provider(s) have with other programs and providers who are involved in their care but who are not associated with SCF;
- Choose to participate in clinical research projects, if eligible;
- Be informed of unanticipated outcomes;
- An environment that preserves the customer-owners cultural, psychological, spiritual and personal beliefs, values and preferences, dignity, privacy, safety and security, and that is free from mental and physical abuse, including humiliation, harassment, neglect, mistreatment, and exploitation including financial;
- Give permission for students to be involved in care, treatment, and services;
- Know the name, job responsibilities, and qualifications of the employees involved in their care, treatment, and services;
- Access and participate in available religious and spiritual services;
- Know about SCF program procedures and regulatory requirements;
- Effective and safe care, treatment, and service;
- Voice concerns regarding their services or quality of care, and have concerns addressed with assurance that doing so will not result in coercion, discrimination, reprisal, retaliation, or unreasonable interruption in care or services;

-  Designate a surrogate decision maker, if they become incapable of understanding a proposed treatment or procedure or are unable to communicate their wishes;
-  Have end-of-life decisions honored as permitted by appropriate laws, statutes and regulations;
-  Have access to information in their medical records in a timely manner; and
-  Be informed of what to do in an emergency situation that occurs while receiving services.

Customer-owners may voice their complaints, compliments, concerns, or grievances to any SCF employee, customer service representative, or:

-  SCF customer-owner feedback line:
[1 \(877\) 837-4251](tel:18778374251)
-  Concerns related to quality of care issues may be addressed with Quality Assurance at [\(907\) 729-5229](tel:(907)7295229), the Joint Commission at [\(630\) 792-5800](tel:(630)7925800) or online at: <https://www.jointcommission.org/about/contactus.aspx>
-  Alaska Department of Health and Social Services, Division of Public Health, Certification and Licensing Unit [\(907\) 334-2483](tel:(907)3342483).
-  KEPRO (Region 10: AK, ID, OR, WA) Medicare BFCC-QIO (CMS) Beneficiary Helpline Toll-free: [1 \(888\) 305-6759](tel:18883056759) TTY: [1 \(855\) 843-4776](tel:18558434776)

SCF encourages customer-owners to take responsibility to:

-  Give full information about their health including all medications, herbal supplements, and over the counter products they are taking;
-  Give complete and accurate information regarding changes in address, telephone numbers, emergency contact, and insurance information;
-  Partner with care team to develop a wellness care plan as indicated;
-  Ask questions;
-  Inform employees if they do not understand and request an interpreter;
-  Respect and be considerate of the rights and property of others, including other customer-owner's, visitors, employees, property, and equipment;
-  Follow appropriate program procedures, and accept consequences for not following procedures and expectations;
-  Keep scheduled appointment times, or call prior to appointment to reschedule the appointment;
-  Express any concerns or problems to SCF;
-  Provide a safe environment for care, treatment, and services provided in their place of residence; and
-  Advise their care team about any advanced directives.

Employees should know and abide by customer-owner rights, and encourage customer-owner involvement.

12 OUR COMMITMENT TO ETHICAL RESEARCH

SCF Research was established in 2007 to improve the health and wellness of the Native Community through high-quality health services research. SCF recognizes the value of medical, social, and physical science research with Alaska Native people. SCF Research addresses a wide variety of medical and behavioral health topics aligned with SCF's wellness objectives, which ensures research is respectful and beneficial to SCF and protects customer-owner's rights and privacy. Some examples of SCF Research studies include personalized medicine, suicide prevention, trauma, and diabetes.

SCF's Tribal Review process is a multi-step research review process that occurs across the life of a study, from project development through dissemination of findings.

We commit to:

- Receiving orientation from SCF Research prior to starting a research project;
- Obtaining Alaska Area Institutional Review Board (AAIRB) and the SCF Board of Director's approval for research, and complying with SCF's Research Proposal Procedure;
- Protecting the integrity and interests of SCF regarding information procurements, products, services, transactions, and arrangements that might benefit the private interests of individuals within the organization, and guarding against actual or apparent conflict of interest or impropriety;
- Ensuring zero tolerance of research misconduct in science, which means the fabrication, falsification, plagiarism, or other practices that seriously deviate from those that are commonly accepted within the scientific community for proposing, conducting, or reporting research;
- Supporting research that is in the best interest of customer-owners, while ensuring the protection and safety of any information collected for such purpose;
- Acting to protect the safety and well-being of customer-owners;
- Protecting and preserving Alaska Native cultures and ensuring that research activities are conducted in a way that does no harm to Alaska Native people or Alaska Native culture;
- Ensuring that research will not negatively impact the provision of services, and will be consistent with SCF's corporate goals and objectives;
- Requiring all investigators complete required education on the protection of human research participants;
- Protecting the privacy of research participants and maintaining the confidentiality of research data;
- Reporting research misconduct and inappropriate research practices; and
- Seeking assistance from SCF Corporate Compliance, such as for privacy consultations.

13 OUR COMMITMENT TO EACH OTHER

SCF promotes and drives a culture of quality and safety, where all individuals, including employees, external partners, and customer-owners are valued as trusted collaborators in the journey to wellness. Employees are expected to utilize core concepts and customer experience RELATE standards in all interactions.

We do not condone or allow disruptive, unreasonable actions towards an individual(s) which are intended to intimidate, degrade, humiliate, or undermine.

Protecting Employee Information

We respect the privacy of employees, and are committed to protecting confidential information in accordance with all applicable laws. We do not disclose information without appropriate approval, and exercise care to ensure that confidential information is carefully maintained, managed, and safeguarded.



We commit to:

- Holding personal and proprietary information in the strictest confidence, and ensuring it is accessible for use only by those with a legitimate, job related need to know;
- Ensuring the only personal information that SCF collects or maintains is that which is related to working here, and access to this information is restricted to employees with a legitimate need associated to their job;
- Releasing employees' personal information outside SCF only with employee approval, except to verify employment, cooperate with regulatory proceedings, or comply with legally-enforceable documents;
- Safeguarding protected and confidential information to ensure it is not disclosed inappropriately or misused; and
- Protecting SCF employee information including email, voicemail, and time and attendance information;
- Protecting and safeguarding mobile devices, such as smart phones, cameras, tablets or laptops, from loss or theft and to prevent these devices from being used to inappropriately access or transmit protected, confidential information.



Scenario:

Q: Becky works in SCF Finance. As part of Becky's job duties, she prepares payroll records. She receives a call from her uncle who asks her for information about a new employee, so he can contact her. Becky uses her employee access to look up the new employee. She not only shares the new employee's contact information but also her job description, pay grade, department, and supervisor's name. Becky's co-worker overhears Becky on the phone and asks Becky what the conversation was about. Becky says that she was just giving information about a new employee to her uncle. The co-worker is concerned that Becky just violated the new employee's confidentiality. What should the co-worker do?

A: The co-worker should discuss her concerns with her supervisor or manager, or she can contact SCF Corporate Compliance directly at [\(907\) 729-4200](tel:(907)729-4200). She may call the SCF Employee Ethics and Compliance Hotline, [1\(888\) 309-1715](tel:1(888)309-1715) if she chooses to remain anonymous.



Tobacco-Free Workplace

SCF is a health care organization committed to working with the Alaska Native community to achieve wellness through health and related services. We believe that to accomplish this, we must model good health behaviors at all times. The use of tobacco products in any form is prohibited on the Alaska Native Health Campus and within all buildings, facilities, and property owned, leased, controlled, or used by SCF. We are prohibited from using tobacco products during work hours. The SCF Wellness Center offers programs to assist employees in their efforts to stop using tobacco products.

SCF is a health care organization committed to working with the Alaska Native community to achieve wellness through health and related services. We believe that to accomplish this we must model healthy behaviors at all times.

We commit to:

- Promoting a tobacco-free workplace, free of the damaging effects of nicotine and secondhand smoke;
- Modeling healthy behaviors during work hours and while on SCF property;
- Reminding customer-owners of our tobacco free policy through signage on the Alaska Native Health Campus; and
- Referring customer-owners and visitors to the SCF Tobacco Cessation Program or the State of Alaska Tobacco Quit Line.



Drug-Free Workplace

SCF promotes a healthy lifestyle among employees: physically, mentally, emotionally, and spiritually. We recognize that the safe, productive, and efficient operation of our services is dependent upon the overall wellness of employees. The use of illegal drugs, the abuse of legal substances, and the abuse of alcohol pose serious health and safety risks and are inconsistent with the behavior expected of employees.

We commit to:

- Prohibiting the illegal manufacture, distribution, dispensation, possession, or use of any illegal drug or controlled substance while on SCF premises, at official SCF functions, or while engaged in company business;
- Prohibiting the consumption of alcoholic beverages while on SCF property;
- Using drug and alcohol testing in addition to searching SCF property and facilities, as a means of enforcing SCF's Drug and Alcohol-Free Workplace Policy and Procedure;
- Notifying your supervisor or department manager if utilizing a controlled substance as part of a prescribed medical treatment; and
- Furthering wellness through the SCF Employee Assistance Program which provides help for those seeking assistance with a substance use problem.



Harassment-Free Workplace

SCF will not tolerate any form of harassment, of or by its employees. Employees are expected to avoid any statements or conduct that could reasonably be interpreted as harassment. Harassment may take many forms. Any type of harassing conduct will be subject to corrective actions, up to and including termination.

SCF is committed to maintaining a workplace free of discrimination, harassment, violence, and other abusive conduct. We have zero tolerance for any form of discrimination or unlawful harassment based upon race, color, national origin, sex, sexual orientation, gender identity, age, physical or mental disability, religion, marital status, pregnancy, parental or military status or any other status protected by federal or state law.

We commit to:

- Treating each other with respect and dignity;
- Acting professionally and respectfully in all interactions, both in person and in writing;
- Prohibiting threats or acts of violence against co-workers, customer-owners, visitors, or any other persons who are either on SCF premises or have contact with employees in the course of their duties; and
- Reporting incidents of discrimination, harassment, or workplace violence to SCF Corporate Compliance, Human Resources, Quality Assurance, or any SCF manager, so that we may promptly and fully investigate any suspected incidents.



Employment

SCF relies on each employee's expertise, commitment, dedication, and team spirit to reach our corporate goals and objectives. We believe in supporting professional and personal wellness goals so that each person can reach their full potential in support of SCF's Vision and Mission.

SCF relies on each employee's expertise, commitment, dedication and team spirit to reach our corporate goals and objectives.

We commit to:

- Providing equal employment opportunities for all persons, while practicing SCF's legal right to give preference to Alaska Native and American Indian people under the Native Preference Policy in all phases of the employment and training process;
- Prohibiting discrimination based upon race, color, national origin, sex, age, physical or mental disability, religion, marital, pregnancy, parental status, or any other status protected by federal or state law; and
- Investigating and remediating reported unethical behavior with Corporate Compliance, Human Resources, and Quality Assurance.

Addressing Disruptive Behavior

SCF promotes and drives a culture of caring. We do not condone or allow the improper use of authority. Bullying, disruptive behavior or repeated, unreasonable actions that are intended to intimidate, degrade, humiliate, or undermine another person will not be tolerated.

Disruptive behaviors toward customer-owners, co-workers, and external partners include, but is not limited to:

- Hostile, angry, aggressive confrontational voice or body language;
- Written, verbal, or physical attacks that demean or harm another individual;
- Inappropriate expressions of anger, such as destruction of property or throwing items;
- Abusive language or criticism directed at anyone in such a way as to ridicule, humiliate, intimidate, undermine confidence, or belittle;
- Derogatory comments that go beyond differences of opinion that are made to customer-owners or families of customer-owners about caregivers (this is not intended to prohibit comments that deal constructively with the care given); and
- Writing of malicious, arbitrary, or inappropriate comments or notes in medical records.

We commit to:

- Monitoring compliance through employee surveys, peer and team member evaluations, focus groups, and direct observations;
- Protecting employees from retaliation who in good faith report a concern, issue, problem, or suspected violation;
- Reporting complaints or incidents regarding alleged disruptive or other prohibited behavior; and
- Reporting incidents of discrimination, harassment, or workplace violence to Human Resources, Corporate Compliance, or any SCF manager so that we may promptly and fully investigate any suspected incidents.



Retaliation

SCF encourages good-faith reporting of concerns or suspected violations of law, regulations, SCF policies and procedures, and the Code of Conduct and Ethics without fear of retaliation or reprisal.

SCF has zero tolerance for retaliation of any kind against individuals who, in good-faith, raise questions, report concerns, or participate in investigations.

If an employee is concerned about retaliation or believes that they have been subject to retaliation for reporting a possible violation or for participating in an investigation, the employee should immediately contact their supervisor, manager, SCF Corporate Compliance, Human Resources, or call the SCF Employee Ethics and Compliance Hotline at [1 \(888\) 309-1715](tel:18883091715).

Intentionally making a false accusation is strictly prohibited and may lead to corrective action, up to and including termination of employment.



14 OUR COMMITMENT TO INTEGRITY IN RELATIONSHIPS

Conflicts of Interest

In carrying out our responsibilities as SCF employees, we must act to protect SCF's business interests and not act in a way that adversely impacts the business activities of SCF.

An SCF employee may have personal or professional interests/activities that conflict with the business interests or activities of SCF, which could interfere with the employee's ability to act in the best interests of SCF when performing his or her job duties. This is an actual conflict of interest.

An SCF employee may be involved in a particular SCF business matter or transaction and the circumstances are such that a reasonable person with knowledge of the relevant facts would question the employee's ability to act in the best interests of SCF. This is an apparent conflict of interest.

It is not unethical or illegal if an SCF employee has a conflict of interest related to SCF. How the employee manages the conflict is what is most important. SCF employees must disclose and resolve all personal or professional interests/activities that potentially conflict with the business interests or activities of SCF, pursuant to SCF's Conflict of Interest Procedure. In addition, SCF employees must avoid or eliminate circumstances that create an apparent conflict of interest, in order to avoid the appearance of impropriety regarding a particular SCF business matter or transaction.

We commit to:

- Using our best efforts to ensure that SCF's business interests and activities are protected;
- Ensuring our personal and professional interests/activities unrelated to SCF do not interfere with our ability to act in a way that is in the best interests of SCF;
- Making business decisions that are in the best interests of SCF and avoiding circumstances that could compromise the business interests or activities of our organization;
- Fully disclosing and resolving all potential conflicts of interest related to SCF;
- Eliminating circumstances that create an appearance of impropriety related to SCF business matters or transactions;
- Consulting with the SCF Legal Department if we are uncertain about a potential conflict of interest related to SCF so that it can be appropriately resolved; and
- Complying with SCF's Conflict of Interest Procedure.



This is not a complete list of potential conflicts of interest. They may exist in other situations. If you are unsure as to whether or not you have a personal or professional interest/activity that conflicts with the business interests or activities of SCF, you must contact the SCF Legal Department, in accordance with SCF's Conflict of Interest Procedure. The Legal Department will help to ensure that all appropriate action is taken, as determined by the facts and circumstances, to resolve your potential conflict of interest related to SCF.

A Conflict of interest may exist if an SCF employee or an immediate family member of an SCF employee:

- Has a financial interest in, or is compensated by, an organization that conducts business with SCF or proposes to conduct business with SCF;
- Has a financial interest in, or is compensated by, a business competitor of SCF;
- Receives a financial benefit from a business transaction between SCF and another organization
- Serves on the board of directors or Tribal council of an organization that conducts business with SCF or proposes to conduct business with SCF;
- Engages in an activity unrelated to SCF, including employment or contract work at another organization, that: (1) adversely impacts the employee's ability to fulfill his or her employment obligations to SCF; (2) involves the use of SCF equipment, supplies, or facilities; (3) could imply SCF's sponsorship or support of the activity; or (4) competes for business with SCF.



Scenario:

Q: The SCF Compliance Department is planning its annual Christmas party and decides to contract with a vendor to provide food and beverages for the party. A Compliance Department employee informs his wife about the party because she owns a catering company. The employee's wife submits a proposed contract to cater the Compliance Department's Christmas party. The contract terms offered to SCF benefit the catering company more than they benefit SCF. What should the Compliance Department employee do?

A: The employee should immediately disclose his actual conflict of interest related to SCF's consideration of proposed catering contracts for the Compliance Department's Christmas party pursuant to SCF's Conflict of Interest Procedure.

The Compliance Department employee has a personal interest in the business transaction to be considered by SCF because his wife will receive a financial benefit if SCF awards a catering contract to her company. In addition, if SCF agrees to the contract terms proposed by the employee's wife, the benefit to her company will be greater than the benefit to SCF.

This personal interest of the Compliance Department employee conflicts with SCF's business interests in ensuring an open and competitive procurement process and in negotiating contract terms that are most favorable to SCF.

The appropriate resolution of the Compliance Department employee's conflict of interest is to ensure that the employee does not participate in any discussions or activities related to the negotiation, award, or management of the catering contract for the Compliance Department's Christmas party.



Gifts and Entertainment

We acknowledge gifts are commonly exchanged as part of the culture and traditions in the Native Community. As such, these gifts may be accepted with leadership approval on behalf of SCF and should be used within SCF as appropriate.

SCF's President/CEO or Vice President of Executive and Tribal Relations will make the determination as to whether or not SCF can properly accept the gift.

If there is a question related to the appropriateness of a gift, seek approval from a manager, SCF Corporate Compliance, General Counsel, or the President/CEO.

We commit to:

- Not accepting cash or cash equivalent (gift cards) in any amount from customer-owners, contractors, or vendors if the gift is provided because of the recipient's relationship with SCF;
- Returning the gift of cash or gift card of any amount to the donor with the explanation that SCF policy does not permit the acceptance of the gift;
- Not accepting personal gifts worth more than \$100 from customer-owners, contractors, or vendors. An employee who receives a personal gift worth more than \$100 must: (1) return the gift to the donor with the explanation that SCF policy does not permit the acceptance of the gift, or (2) seek guidance about the possibility of accepting the gift on behalf of SCF, in compliance with the SCF Conflict of Interest Procedure; and
- Recognizing that at certain times, in respect of the culture and traditions of Alaska Native and American Indian people, a gift may be properly accepted on behalf of SCF and must be used within SCF as appropriate.



We commit to:

Political Activities

SCF encourages employees in a non-partisan manner to participate in the electoral process. We are committed to creating and maintaining an environment that ensures employees' ability to administer SCF programs without bias or favoritism arising from political affiliation.

SCF prohibits the use of SCF resources in connection with political campaign activities in support of or in opposition to candidates.

- Ensuring each employee's right to freely express their views, and to vote accordingly, in compliance with SCF's Political Activity Policy;
- Prohibiting the use of SCF resources in connection with political campaign activities;
- Separating personal involvement in political activities from SCF business; and
- Ensuring employees' personal statements or personal commitments to political activities are not associated with SCF.

Personal Relationships

At times, we may find ourselves working with our family members at SCF. While this alone does not create a conflict of interest, having authority over, or a reporting relationship with our family members does. Therefore, to avoid the appearance of favoritism, we must not hold, or permit another employee to hold, a supervisory position over a family member unless approved by SCF's Director of Human Resources. A family member in this case is a spouse, partner, child, step-child, parent, step-parent, sibling, step-sibling, grandparent, grandchild, in-law, or any other member of your immediate household.

For more information on working with friends and family, please see SCF's Employment of Relatives Procedure.

To avoid the appearance of favoritism, we must not hold a supervisory position over a family member unless approved by SCF's Director of Human Resources.

Witnessing and Notarizing Documents

Customer-owners may ask employees to serve as witnesses on certain documents.

SCF employees may not witness Advance Health Care Directives, Durable Power of Attorney for Health Care, Living Wills or Five Wishes documents. Alaska state law prohibits employees of the health care facility where the individual is receiving care from witnessing these documents.

When appropriate, employees may serve as a witness for a customer-owner on a document or notarize a document for a customer-owner, their family, or their legal representative. Witnessing and notarizing documents for customer-owners by employees is allowable as a convenience for the customer-owner. However, any employee not comfortable witnessing a particular document is not required to do so.

We commit to:

- Reviewing documents for any restrictions on who may serve as a witness and complying with those restrictions;
- Witnessing documents when appropriate or helping the customer-owner make other arrangements;
- Following state laws governing witnessing documents and notarizing documents;
- Encouraging customer-owners to have witnesses for a Last Will and Testament who are not employed by SCF; and
- Refraining from witnessing an Advance Directive for Healthcare, a Durable Power Of Attorney for Health Care, a Living Will, or a Five Wishes document pursuant to Alaska state laws.



15 OUR COMMITMENT TO BUSINESS PARTNERS

Our business transactions will always adhere to the highest standards of ethical behavior and legal compliance. The Code of Conduct and Ethics cannot identify all compliance concerns, or identify appropriate ethical behavior for every situation that may be encountered. Employees must also rely on good judgment to ensure decisions and actions taken by them reflect SCF's commitment to integrity.

Building trusted relationships with external business partners and associates who we do business with, and others in the communities we serve, is an important part of SCF's operational principles. The Code of Conduct and Ethics confirms SCF's commitment and responsibility to conduct all business and operations in an ethical and legally compliant manner.

This commitment extends to our business partners including all independent contractors, subcontractors, vendors, or business associates conducting business on behalf of SCF. Business partners must adhere to all applicable laws and regulations applicable to the scope of work they perform while under contract with SCF. We are all responsible for ensuring appropriate agreements are in place prior to initiating any services under the agreement. Business partners and associates are encouraged to have their own compliance program, and are also expected to comply with the provisions and standards of SCF's Code of Conduct and Ethics.

We make a strong effort to partner with Alaska Native, American Indian, and minority owned businesses.

Please review SCF's Uniform Guidance (UG) for the Procurement of Goods and Services Procedure and Business Associates Procedure for more information.

We commit to:

- Knowing and complying with SCF policies and procedures, Code of Conduct and Ethics, and the CoP related to your area of responsibility;
- Modeling ethical behavior and fostering a culture of transparency by listening and being receptive to employee concerns about integrity and compliance-related issues;
- Participating in job-specific compliance education or departmental training as necessary for our job duties;
- Documenting services in a complete, accurate, and timely manner and in compliance with payer documentation requirements;
- Billing government payers, commercial insurance payers, and customer-owners accurately, timely, and in compliance with payer billing requirements; and
- Maintaining our credentials, certifications, and licenses in good standing.

SCF is committed to ethical behavior in all interactions with internal and external business partners.



Relationships with Contractors and Suppliers

SCF conducts business in an honest and ethical manner, partnering with other honest and ethical businesses. SCF works with diverse partners to deliver health care services, support the education and training of Alaska Native and American Indian people, and secure funding for SCF programs and employees. SCF strives to develop and maintain collaborative relationships with the suppliers and service providers who support our business.

SCF strives to develop and maintain collaborative relationships with the suppliers and service providers who support our business.

We commit to:

- Establishing partnerships with businesses that conduct ethical and honest business practices;
- Partnering with vendors and business partners who can deliver the greatest value in terms of price, quality, service, and support;
- Utilizing General Service Administration pricing as the benchmark for agreements with vendors and business partners when complying with the Uniform Guidance;
- Giving preference to Alaska Native, American Indian and minority owned vendors and business partners; and
- Screening current and potential business partners to ensure they are not excluded or debarred from federal programs.

16 OUR COMMITMENT TO STAKEHOLDERS

Use, Management, and Protection of Assets and Technical Resources

SCF strives to provide appropriate assets and technological resources for work needs. These assets and resources include, but are not limited to: desks, confidential files, equipment, supplies, facilities, computers, telephones, voice and email, mobile communication devices, copy and fax machines, and the internet. SCF assets also include confidential information, business strategies, and various technologies.

SCF's Information Security Management Program (ISMP) protects the organization, its workforce members, stakeholders and customer-owners through management of information technology related risk and a commitment to information security.

Limited occasional personal use of these resources is permitted. SCF has the right to monitor all use of electronic assets. This includes all data and communications transmitted by, received by, or contained in SCF's email or voicemail systems, as well as all electronic documents maintained on SCF's laptops, or any other devices on which SCF's confidential information is transmitted or stored, regardless of whether the device is owned by you or SCF.



We commit to:

- Investing in resources to protect the security, privacy, confidentiality, integrity and availability of information, software, networks systems, and business assets which rely on information technology through investment in technological and human resources;
- Continually improving SCF's ability to protect critical business processes and assets as a shared responsibility;
- Establishing information systems related security policies and procedures in alignment with nationally adopted industry practices which adhere to all applicable regulatory requirements, state, and federal laws;
- Using, managing, and protecting company assets and technological resources from loss, damage, misuse, theft, or destruction in accordance with our policies and procedures;
- Limiting personal use of company assets or technological resources and recognizing that there is no expectation of privacy when using SCF assets or resources;
- Understanding that information gathered for SCF using company resources is the property of SCF;
- Using SCF's technologies in a respectful, ethical, and professional manner and not using the Internet for unauthorized, unlawful, or inappropriate purposes, or to download sexually suggestive or explicit material;
- Not making unauthorized copies of computer software or using personal software on SCF's computer equipment; and
- Protecting and safeguarding mobile devices, such as smart phones, cameras, tablets or laptops, from loss or theft and to prevent these devices from being used to inappropriately access or transmit protected, confidential information.





Scenario:

Q: You receive an email from Information Technology Systems (ITS) suggesting that there is a problem with your system and requesting that you send your user name and password. What do you do?

A: You remember receiving an email from ITS informing employees that ITS would never ask for your password. You submit the email to ITS using the phishing icon in Outlook called the Phish Alert Report button. ITS contacts you and confirms that the email was not from them and thanks you for being alert.

Social Media, Networking, and Online Presence

SCF does not seek to limit employee's personal participation in social media or other public forums. However, employees should not access social media on SCF's time or while utilizing company assets, unless required as part of your job responsibilities. Online conversations are permanent and can be held to the same legal standards as traditional media communications.

Improper usage of social media can jeopardize SCF's reputation and compliance to strict privacy standards.



We commit to:

- 🐟 Keeping customer-owner and employee information private, in accordance with our commitment to privacy and compliance with state and federal regulations;
- 🐟 Keeping SCF information confidential;
- 🐟 Speaking on behalf of SCF only when authorized to do so from leadership;
- 🐟 Speaking about SCF in a manner that supports our Vision and Mission;
- 🐟 Being responsible for our own actions when communicating and posting on and through personal social media accounts;
- 🐟 Being aware that social media posts, likes, and comments about SCF, positive or negative, are capable of tarnishing SCF's image;
- 🐟 Refraining from using social media on SCF's time or while using company property unless as part of our job responsibilities;
- 🐟 Ensuring that we do not create an appearance that we represent SCF, or are expressing opinions on behalf of SCF on social media, blog posts, articles, or personal websites;
- 🐟 Refraining from initiating or accepting friend requests from those to whom we provide direct care or with those we supervise; and
- 🐟 Not providing medical advice to customer-owners through social media.



Scenario:

Q: A supervisor receives a friend request on social media from one of their employees. What should she do?

A: The supervisor likes the employee and they have a good work place relationship. Accepting a friend request from this employee is not a violation, however, the supervisor understands that it may overstep boundaries and may appear to others as favoritism. The supervisor refrains from accepting the request and explains their actions to the employee. The employee thanks the supervisor for explaining the circumstances. The supervisor then discusses the topic at an all-staff meeting.



Financial Integrity

Every person at SCF must help maintain the integrity of SCF's resources, financial records, and financial reporting. We ensure federal funds expended are allowable under federal cost principles and in compliance with the Uniform Grant (UG) Guidance. Contracts will be executed with responsible contractors possessing the ability to perform successfully under the terms and conditions of the contract. SCF will not enter into a contract with an individual or vendor who has been debarred or excluded from participation in federal programs.

Items and assets purchased or created by SCF are tracked and monitored including but not limited to buildings, property, equipment, vehicles, media and data storage devices, confidential and protected information, business strategies, intellectual property and technologies in accordance with SCF policies and procedures.

SCF's President/CEO, Chief Financial Officer, and other designated SCF Officers have additional requirements to protect the financial integrity of the organization as outlined in the SCF Board of Directors and Officer Conflict of Interest Policy.

We commit to:

- Ensuring that all business documents are authorized with the proper authority in accordance with SCF's Signature Authority Policy;
- Ensuring that all SCF financial information accurately reflects transactions in compliance with generally accepted accounting principles;
- Strictly prohibiting the establishment of secret, undisclosed, or unrecorded funds;
- Following applicable internal accounting controls, and fully participating in internal and external audits;
- Maintaining accurate inventory of SCF assets, and timely reporting of misplaced or stolen assets;
- Ensuring timely review of timecards, leave, and pay for accuracy and timely reporting of all discrepancies, including but not limited to over-payments, payment corrections, personal leave, or time entry errors;
- Certifying timecards to accurately reflect the location and funding source(s) as indicated by the General Ledger Coding and within compliance with funding source restrictions;
- Maintaining complete and accurate customer-owner medical records in accordance with state and federal privacy and security laws, regulations, and policies;
- Billing payers and customer-owners according to all applicable laws, regulations, and policies;
- Responding to questions and complaints related to a customer-owner's bill in a direct and honest manner;
- Ensuring we do not knowingly submit a claim for payment or reimbursement that we know to be false, fraudulent, or fictitious;
- Assigning diagnostic, procedural, and billing codes that accurately reflect the services that were provided;
- Checking the List of Excluded Individuals/ Entities (LEIE) maintained by the OIG; and
- Conducting periodic reviews of coding practices and policies to ensure they are current and consistent with applicable state, federal, and private payer health care program requirements.



Documents and Records

SCF's documents and records are vital business assets that must be managed effectively and systematically controlled to provide the organization with current, accurate, and readily available information.

All information that is created, used, accessed, distributed, tracked, stored, retained, and destroyed must be managed in accordance with all applicable laws, regulations, policies, and procedures. Records shall be maintained in a secure manner and retained for the mandated time periods applicable to each type of record regardless of the media in which they exist. For example, paper, electronic, video, microfilm, or any manner of digital storage mediums. Any record that is subject to investigation or audit, involving audit findings, under appeal, litigation, or legal hold will be held until the action is completed or the dispute resolved.

Records include employment records, financial records, health records, medical quality assurance records, proprietary business information, education and training records, and protected information. Examples of protected information include medical, clinical, or proprietary business information, such as training materials or business plans, or employment information, such as individual salary, benefits, payroll, personnel files including information on disciplinary matters.

We commit to:

- Creating documents and records of business information that contain only truthful and accurate information;
- Safeguarding records from inappropriate access, use, or disclosure;
- Managing record retention and destruction in accordance with applicable law;
- Maintaining customer-owner medical records in accordance with all applicable guidelines;
- Maintaining a destruction log, including the date, the record custodian, supervisor's authorization of destruction, how the records were destroyed, and who oversaw the destruction; and
- Understanding our obligations regarding confidential information held by SCF that is protected by federal and state laws, and policies and procedures for SCF and Alaska Native Medical Center.

Proprietary Information

SCF may have access to information concerning employees, customer-owners, proposed business partners, proposed corporate investments, or other activities and information.

Proprietary business information is confidential and should only be shared with individuals who need to know.

Examples of proprietary information include training materials or business plans, or employment information such as individual salary, benefits, payroll, personnel files, and information on disciplinary matters.

Patents, trademarks, copyrights, and trade secrets are all considered to be intellectual property. We have an obligation to protect our assets and to respect the intellectual property rights of others.

We commit to:

- Honoring contractual obligations with third parties to keep certain information confidential;
- Physically safeguarding and disposing of confidential information properly to avoid inadvertent or improper disclosure;
- Accepting the legal and ethical obligation, as an SCF employee, to protect this information;
- Avoiding unauthorized use, or copying of intellectual property; and
- Taking necessary measures to protect SCF's intellectual property, including SCF's logo and other work products prepared by SCF or on behalf of SCF.



17 OUR COMMITMENT TO THE COMMUNITY



We commit to:

- Supporting, mentoring, and advocating for Alaska Native and American Indian people;
- Serving on key local, state, and national committees and boards;
- Maintaining direct relationships with tribal organizations and local governments to aid improvement efforts;
- Emphasizing the provision of support and outreach to Elder and youth populations;
- Encouraging employees to share time and expertise with charitable organizations; and
- Encouraging employees to personally engage in community activities through volunteerism.

Giving back to the Community

SCF is committed to operating in a manner that furthers the well-being and long-term sustainability of the communities in which we live and work. We strive to be a good business partner and community member through building relationships and responsible stewardship of resources. SCF offers many programs in which the community may participate. For example, SCF offers programs such as learning circles, Alaska Women's Recovery Project, the Annual Gathering, Family Wellness Warriors Initiative (FWWI), Soldier's Heart, elder program and elder day of caring, the RAISE intern program, Employee and Community Assistance Fund (ECAF) program, and many others.



We commit to:

Protecting the Environment

SCF conducts its business activities in a manner which respects, preserves, and enhances the quality of the environment. SCF accomplishes this through many methods including: participation in green programs, promotion of alternative transportation, recycling, and other efforts to reduce waste. When permitted, items that are no longer utilized may be recycled, traded-in, donated, sold to a private party or organization, disassembled or used for parts.

- Providing recycle bins and encouraging recycling in both employee work areas and public spaces within SCF's facilities;
- Reducing paper consumption by promoting a paperless environment;
- Continuing to assess ways to reduce waste produced by the provision of care and supporting internal processes; and
- Continuing to reduce energy consumption through efficient building systems and designs.



Marketing and Advertising

SCF utilizes marketing and advertising activities to raise awareness about SCF programs and services and to recruit Alaska Native and American Indian candidates into our health care system.

SCF strives to engage the media in an honest and collaborative manner to build a positive image, manage our reputation, and disseminate accurate information in a timely manner.

Media Relations and External Inquiries

SCF strives to engage the media in an honest and collaborative manner to build a positive image, manage our reputation and disseminate accurate information in a timely manner. SCF Corporate Communications and Public Relations is dedicated to fulfilling the needs of the media while maintaining SCF's Vision and Mission.

The President/CEO of SCF is the official spokesperson of SCF and the only individual who can communicate with any member of the news media. The Director of Public Relations, with the approval of the President/CEO, may designate another spokesperson.

If any other employee of SCF wishes to make a public statement, engage in an interview, or in any other way communicate with the news media on behalf of SCF, whether at the employee's or the media's instigation, that employee must obtain in advance, written or verbal clearance from the President/CEO or designee via SCF Public Relations.



We commit to:

- Operating ethically and within the laws that govern marketing and advertising activities;
- Providing what we know to be truthful and non-deceptive information;
- Educating the public by accurately representing the care, treatment, and services we provide both directly and by contractual agreements;
- Reflecting accurately the scope of facilities and services that are accredited, certified, and licensed;
- Increasing awareness about SCF programs and services;
- Directing all media requests to Corporate Communications and Public Relations, ensuring only approved spokespersons may speak to the media on behalf of SCF;
- Obtaining written consent prior to producing recordings, films, or other images of customer-owners;
- Describing, within the written consent, how recordings, films, or other images will be used;
- Informing customer-owners of their right to withdraw their consent to the production of the recordings, films, or other images;
- Ensuring those involved in the production of recordings, films, or other images of customer-owners have read and signed SCF's confidentiality statement;
- Maintaining a positive and professional relationship with all media; and
- Respecting the time constraints of media by fulfilling media requests.

Notes

GLOSSARY OF TERMS

Accreditation:

Continuous process by which organizations are required to demonstrate to the accrediting body that they are providing safe, high-quality care as determined by the standards and requirements of the accreditation organization.

Alaska Personal Information

Protection Act (AK PIPA):

AK PIPA requires the protection of identifiable information that consists of a combination of an individual's name and social security number, driver's license number, credit card number or other passwords, personal identification numbers or other access codes for financial accounts.

Alaska Native Medical Center (ANMC)

Accredited Campus:

The Accredited Campus is jointly owned and managed by the Alaska Native Tribal Health Consortium and Southcentral Foundation under the terms of Public Law 105-83.

The Accredited Campus is made up of facilities from ANTHC and SCF which includes: ANMC Hospital located at 4315 Diplomacy Drive, SCF programs include ANMC Dental, Audiology, Behavioral Urgent Response Team, and Fast Track; Anchorage Native Primary Care Center located at 4320 Diplomacy Drive, SCF programs include Laboratory, Pediatrics, Pharmacy, Primary Care Clinics, Radiology, and Traditional Healing; Flattop Mountain Parking Garage located at 4450 Diplomacy Drive; Mount Marathon building located at 4201 Tudor Centre Drive, SCF programs include, Complementary Medicine and Physical Therapy and Exercise; Dr. Katherine and Dr. Kevin Gottlieb building located at Diplomacy Drive, SCF programs include OB-GYN and Child and Family Developmental Services; and Alaska Spine Institute located at 3801 University Lake Drive, Suite 220, SCF programs include Audiology.

Anti-Kickback Statute (42 U.S.C. §1320a-7b):

Prohibits the offer or receipt of certain remuneration in return for referrals or recommending purchase of supplies and services reimbursable under government health care programs.

Certifications:

Designation earned by a person to assure qualification to perform a job or task.

Civil Monetary Penalties Law (CMPL):

CMPL authorizes the OIG to impose civil monetary penalties, in addition to exclusion, for various forms of fraud and abuse involving the Medicare and Medicaid programs. Penalties may range from \$10,000 to \$50,000 for each violation, depending on the circumstances.

Compliance:

Acting in accordance with applicable laws, standards, SCF policies and procedures, and the Code of Conduct and Ethics.

Conditions of Participation (CoP):

Rules governing eligibility to participate in Medicare and Medicaid Services and other third-party payer programs, that enable SCF to receive reimbursement from these programs.

Confidentiality:

Information that is considered private and should only be shared with individuals with the need to know authority.

Conflict of Interest – Actual:

A personal or professional interest/activity that conflicts with the business interests/activities of SCF, which could interfere with an employee's ability to act in the best interests of SCF when performing his or her job duties.

Conflict of Interest – Apparent:

A situation in which an employee is involved in a particular SCF business matter or transaction and the circumstances are such that a reasonable person with knowledge of the relevant facts would question the employee's ability to act in the best interests of SCF when performing his or her job duties.

Contractor:

An individual or entity with no relationship to SCF that enters into a contractual agreement with SCF that creates legally binding and enforceable obligations to both SCF and the individual/entity. The following terms may be used by SCF programs and departments in referring to contractors:

1. Consultant
2. Vendor
3. Business Associate
4. Supplier
5. Bidder

Credentials:

Recognition of achievement that is an attestation of the qualification or competence of an individual issued by a third party with authority to determine qualifications and issue credentials.

Customer-Owner:

An individual who seeks and receives services at SCF's programs or departments. The following terms may be used by SCF's programs or departments in referring to customers:

1. Patients
2. Members
3. Beneficiaries
4. Guests
5. Event Participants
6. Clients
7. Learners
8. Students

Debarment and Suspension:

Suspension and debarment actions protect the government from doing business with individuals, companies, and recipients, who pose a business risk to the government. Suspension and debarment actions prevent companies and individuals from participating in government contracts, subcontracts, loans, grants and other assistance programs.

Emergency Medical Treatment and Active Labor Act (EMTALA):

EMTALA entitles people who present to the emergency department to a medical treatment examination and stabilizing treatment regardless of their ability to pay.

Ethical Behavior:

Acting on the basis of SCF's Vision, Mission, Goals, Core Concepts, customer experience standards, operational principles, and leadership principles.

Examination and Treatment of Minors (AS 25.20.025):

The state statute permits minors to consent for their own medical and dental treatment under certain circumstances including but not limited to:

1. A minor who is living apart from their parents or legal guardian and managing their own financial affairs, regardless of the source or extent of the income;
2. If the parent or legal guardian of the minor cannot be contacted, or if contacted is unwilling to either grant or withhold consent, the provider will counsel the minor, keeping in mind the interests of the minor and the parent, guardian or family unit;
3. A minor who is the parent of a child, may consent for their own care, and the care of their child;
4. A minor seeking treatment for the diagnosis, prevention or treatment of pregnancy, or sexually transmitted infections (STI); and
5. Providers may rely in good faith on the representations of the minor.

Exclusion Law:

The U.S. Department of Health and Human Services, Office of Inspector General (OIG), is legally required to exclude individuals and entities convicted of certain criminal offenses from participation in all federal health care programs.

False Claims Act (FCA) (31 USC §§3729-3733):

Makes it a crime for any person or organization to knowingly make a false record or file a false claim with the government for payment.

Fraud and Abuse:

The misrepresentation of the truth or concealment of a relevant fact that induces another to act in a manner that could result in an unauthorized benefit.

Good Faith:

Acting without an intent to harm and without consideration of personal benefit.

Health Information Technology for Economic and Clinical Health (HITECH) Act:

Subtitle D of the HITECH Act addresses the privacy and information security concerns associated with the electronic transmission of health information, in part, through several provisions that strengthen the civil and criminal enforcement of the HIPAA rules.

Health Insurance Portability and Accountability**Act of 1996 (HIPAA):**

The HIPAA Privacy Rule establishes national standards to protect customer-owner health information and other protected information and applies to healthcare providers that conduct certain health care transactions electronically.

1. The Rule requires appropriate safeguards to protect the privacy of personal health information, and sets limits and conditions on the access, use and disclosure that may be made of such information without customer-owner authorization.
2. The Rule also provides customer-owners' with certain rights over their health information, including rights to examine and obtain a copy of their health records and to request amendments.

Individually Identifiable Health Information (IIHI):

Information that is a subset of health information including demographic information collected from an individual, created or received by a health care provider, health plan, employer, or health care clearinghouse, and relates to the past, present, or future physical or mental health or condition of an individual.

Integrity:

Honesty in words and actions:

1. Possession of firm principles – the quality of possessing and steadfastly adhering to high moral principles or professional standards.
2. Completeness – the state of being complete or undivided.

Knowingly:

A person or organization:

1. Had actual knowledge of the information;
2. Acted in deliberate ignorance of the truth; or
3. Acted in reckless disregard of the truth.

Mandatory Reporting (AS 47.17.020):

The state law requires that employees who are mandatory reporters, who suspect a child or vulnerable adult is in danger of abuse, neglect, or exploitation, must report to appropriate authorities immediately or no later than within 24 hours.

Medicaid:

State and federally governed health care insurance generally provided to those who meet low-income or other guidelines.

Medicare:

Federally funded and governed health care insurance provided to people over 65 years old and to younger persons who meet disability guidelines.

Minimum Necessary:

When using or disclosing protected health information, or when requesting PHI from others, Health Insurance Portability and Accountability Act's Privacy Rule requires employees make reasonable efforts to limit information shared to the minimum necessary to accomplish the intended purpose of the use, disclosure, or request. Protected health information should be limited to who really needs to know, and how much does the person really need to know.

Non-Compliant Conduct:

Non-compliant behavior involves behavior that does not conform to or follow the rules, regulations, or advice of others. In the workplace, this can be demonstrated by failure to act in accordance with the workplace policies and rules, or the inability to meet specified standards.

Non-retaliation:

A policy that protects persons who report alleged violations of policies, regulations, or laws from negative or adverse actions as a result of having reported violations.

Notice of Privacy Practices (NoPP):

Describes the HIPAA defined patient rights related to use and disclosure of the individual's health information. The HIPAA Privacy Rule mandates that health care providers distribute a Notice of Privacy Practices to all patients.

Personally Identifiable Information (PII):

Any information about an individual maintained by SCF, including information that can be used to distinguish or trace an individual's identity, such as:

1. Name
2. Social Security Number
3. Date and place of birth
4. Mother's maiden name
5. Biometric records
6. Other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information.

Policies and Procedures:

A statement of purpose used to guide decision making and set direction for SCF.

Privacy Act of 1974:

An Act that prohibits disclosure of records without the written consent of the individual(s) to whom the records pertain, unless an exception applies. The Privacy Act pertains to all records, including but not limited to, electronic, oral, or paper records in the possession and control of SCF.

1. Pursuant to Section 7 of SCF's Funding Agreement with the Indian Health Service, SCF will comply with the Privacy Act provisions.

Protected Health Information (PHI):

Individually identifiable health information, in any format, that is created or received by SCF, including demographic information, and relates to the past, present, or future physical or mental health or condition of a customer-owner, the provision of health care to a customer-owner, payment for the provision of health care, or identifies the customer-owner or could reasonably be used to identify the customer-owner.

1. Does not include employment records held by SCF in its role as an employer.

Referral:

The act of sending a customer-owner to a provider, hospital, or other health care provider or requesting health care services on behalf of the customer-owner.

Stakeholder:

Customer-owners, families of customer-owners, third party payers, contractors, consultants and each other, which might include all workforce members.

Substantial Value:

Cash in any amount; gifts or favors worth \$100 or more.

Third-Party Payers:

A third-party payer is an entity that pays medical claims on behalf of the insured. Examples of third-party payers include government agencies, insurance companies, health maintenance organizations, and employers.

Whistleblower:

Federal and state law provides protection for employees who, in good faith, communicate with government officials regarding possible illegal behavior.

Workforce:

Includes all direct hire employees, Civil Service and Commissioned Corps Officers working under contractual agreements with SCF, volunteers, trainees, residents, interns, students, and other individuals whose conduct, in the performance of work for SCF, is under the direct control of SCF, whether or not they are compensated by SCF.

**Southcentral
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