Code of Conduct
2026

PHYSICIANS
DATA Trust

Management company for
Citrus Valley Physicians Group, Greater Tri Cities IPA,
Noble AMA IPA, & St. Vincent IPA

Table of Contents

Introduction to the Code of Conduct 4
Definition: the Code 4
Putting "the Code" into Action 4
Your Protections 5
Reporting 5
Principles of Conduct 6
Code of Conduct vs. Employee Handbook 6
Conflict of Interest 6
Gifts/Hospitality/Entertainment 7
Inducements 7
Hospitality or Illegal Activity? 8
Political Activity and Lobbying 8
Confidentiality 9
PDT Company Information 9
Protected Health Information 10
Privacy Guidelines 10
PDT Assets 11
Physical Property 11
Electronic Communications Systems and Social Media 12
Intellectual Property 12
Dealing with an "Excluded Person or Entity" 12
PDT Compliance Program 13
The 5 Things You Need to Know About Compliance 13
Your Responsibilities and Obligations 13
Potential Compliance Issues 13
Fraud, Waste, and Abuse (FWA) 14
PDT's Fraud, Waste, and Abuse (FWA) Program 14
How to Report a Potential Compliance Issue, including FWA 15
Compliance FAQs 16

Who is responsible for compliance? 16
How do I know if something is a potential compliance issue? 16
What if I don't understand a rule or regulation? 16
What do I do if I suspect a potential compliance issue? 16
How do I report a compliance issue? 16
What happens if I don't report something that turns out to be a compliance issue? 17
What happens after I report a potential compliance issue? 17
Will I be treated differently if I report a potential compliance issue? 18

Approved by the PDT Compliance Committee on March 10, 2026

Introduction to the Code of Conduct

The framework for conducting business at Physicians DataTrust (PDT), and on behalf of our IPA clients, is contained in this Code of Conduct. It is our commitment to professional integrity, legal compliance and ethical conduct. The Code of Conduct acts as an umbrella under which all of PDT's other standards of conduct (such as those outlined in the Employee Handbook) or other policies and procedures operate.

This Code gives us foundational values and standards and is built on the premise that we all know right from wrong. This means making our decisions and choosing our actions based on what we know to be right, according to all applicable laws and regulations, and according to the policies and procedures we all agree to follow as associates of PDT.

The Code cannot contain all of the rules, policies, and procedures we are each expected to follow. It cannot outline every possible situation in which the right course of action is not crystal clear. But it does give concrete guidance in specific areas and guiding principles to consider in other situations.

It should go without saying that we expect the highest standards of ethical conduct from every employee, board member, contractor, volunteer and other person affiliated with PDT and/or our IPA clients. Dishonesty of words or actions, or intent to defraud anyone of money, property or honest services will not be tolerated.

- You are expected to represent PDT honestly and accurately.
- You are expected to act with integrity.
- You are expected to treat others with respect—whether member, customer, co-worker, regulator, vendor, supplier or competitor.

Definition: the Code

Throughout this document, references to the Code of Conduct or just the Code encompass PDT's commitment to a culture of integrity, and incorporates all applicable federal and state laws, statutes, regulations and sub-regulatory guidance, contractual commitments, and policies and procedures.

Putting "the Code" into Action

Employees, officers, board members, contractors, volunteers and other PDT representatives are expected to conduct their responsibilities in compliance with this Code of Conduct. It is one of the ways we demonstrate—individually and as a company— our commitment to comply with all applicable federal

and state standards, statutes, regulations, sub-regulatory guidance and contractual commitments.

If you become aware of a potential violation of this Code, the law or our policies, it is your duty to report it in a timely manner. If you are ever in doubt about the Code or potential violations of the Code, ask for help. Following this Code is everyone's responsibility and enables us to deliver on our mission.

Your Protections

If you report a potential violation of this Code, your report will be kept confidential to the extent permitted by law and to the extent possible consistent with our obligation to investigate and resolve your report. If you report through the Compliance Department via phone, fax, email, or mail, you can choose to remain anonymous.

PDT maintains a strict policy of non-intimidation and non-retaliation for good faith participation in its Compliance Program, including, but not limited to, reporting potential issues, investigating issues, conducting self-evaluations, audits and remedial actions, and reporting to appropriate officials. Please know that if you report a possible or actual compliance issue in good faith, we will protect you. Any employee who engages in intimidation and retaliation for reporting a compliance concern in good faith will be subject to disciplinary action up to and including termination. See more on this in the Employee Handbook and the PDT Compliance Program.

Reporting

Compliance and ethics issues can be reported in various ways, and to various recipients. Reporting mechanisms are available 24 hours a day, seven days a week, and allow you to remain anonymous, if desired. There are various methods to report compliance issues.

Report compliance and ethics concerns 24 hours a day, 7 days a week using any of the following reporting channels:

1. PDT Compliance Department:

   161 Thunder Drive, Suite 212
   Vista, CA 92083
   ATTN: Compliance Office

   compliance@pdtrust.com
   Phone: (562) 860-8771 ext. 114
   Fax: (562)356-8986

2. Health Plan Compliance Hotline:

A list of health plan contacts by health plan is found in Appendix A of this document.

3. HHS Office of Inspector General:

   Phone: (800) HHS-TIPS (800-477-8477) or TTY (800)977-4950
   Fax: (800) 223-8164
   HHSTips@oig.hhs.gov
   https://oig.hhs.gov/fraud/report-fraud/index.asp

4. National Benefit Integrity Medicare Drug Integrity Contractor (NBI MEDIC):

   (877) 7SafeRx (877-772-3379)

Principles of Conduct

PDT is committed to providing the highest level of service to all our customers. It starts with a commitment on all of our parts to do our jobs right and to do them well. Beyond that, there are certain circumstances that arise with some frequency, so we have addressed them here. For more information, please refer to the specific sections of your Employee Handbook, talk to your supervisor, or contact the Compliance Department.

Code of Conduct vs. Employee Handbook

If you've reviewed your Employee Handbook, some of what you read here should be familiar. Here's the main difference between the two documents: The Code of Conduct reflects our values and directs the manner in which we carry out our business. The Employee Handbook is much more specific—it defines rules for our actions and activities. For example, in the Code we talk about respect for our coworkers and business colleagues; in the Handbook we detail our policies against discrimination and harassment.

Conflict of Interest

A conflict of interest is when employment outside of PDT (or other activities or relationships) creates any actual, potential, or apparent conflict in your ability to do your job, and in particular your ability to make an objective decision that is in PDT's best interest. Simply put, any such activities and relationships are not allowed without disclosing the potential conflict and obtaining consent beforehand from PDT.

Examples of such conflicts of interest include, but are not limited to:

- Acting as a consultant, advisor, employee or independent contractor of/with a PDT competitor, customer or vendor.

- Owning any significant interest (other than as a shareholder of a publicly traded company) in any business or organization that does or seeks to do business with PDT.
- Using company assets or resources for personal gain or advantage.
- Business dealings with relatives or close friends.
- Employment or supervision of relatives or friends. (PDT does not prohibit this, but you must stick to the policy as stated in the Employee Handbook.)
- Investments and financial interests in business partners.

If you face such a situation, discuss it with Human Resources. By attesting to this Code of Conduct, you confirm that you are either free of any conflict of interest or that you have disclosed any potential conflicts of interest to PDT. In addition, all employees with the position of director and above must complete an attestation or certification related to conflict of interest at the time of hire and annually thereafter. See more on conflicts of interest in PDT's Employee Handbook.

Is this a conflict of interest?

Q: One of my vendors told me her company is hiring entry level employees and my recent college grad is looking for a job. What is considered appropriate in this case?

A: You can ask your vendor who your grad should contact. Your son or daughter can then reference how he/she found out about the job. But that's the extent of it. You, and your son or daughter, have no right to expect, the vendor offer or extend, preferential treatment.

Gifts/Hospitality/Entertainment

Our business transactions with vendors, suppliers, contractors and other third parties must be free from influence and even the appearance of influence. In general, you cannot accept gifts and business courtesies unless specific conditions are met. Most important is that there are no strings attached.

Inducements

At PDT, you are not to use any financial or other type of reward that could be seen as trying to induce:

- Potential beneficiaries to join PDT.
- Employees and other licensed professionals to deny or limit care.
- Beneficiaries to commit fraud, waste or abuse.

The use of incentives, bribes or kickbacks to induce such behavior is strictly prohibited by PDT.

How much is too much when it comes to gifts?

Q: A vendor who does a lot of work for our department just offered my supervisor tickets to the Super Bowl. Can we accept?

A: Probably not. This type of gift has a very high value. Even if it's purely a "thank you" gesture with no strings attached, it could be misconstrued. Talk to your supervisor or the Compliance Department if you would be more comfortable.

Hospitality or Illegal Activity?

Q: Some regulators will be on site next month and will be putting in full days at our offices. Can we provide lunch for them?

A: There are very strict guidelines regarding gifts and hospitality offered to government employees and public officials. Please check with the Compliance Officer to make sure what we see as a friendly gesture will not break any laws.

Political Activity and Lobbying

PDT employees are free to participate in and contribute to political organizations or campaigns. You must, however, do so as an individual, and not as a representative of PDT. You may not represent PDT in any of these types of activities, nor may you get reimbursed by PDT for anything related to these activities.

PDT has many contacts and dealings with governmental bodies and officials. Our efforts are focused in our areas of expertise and consist largely of making recommendations concerning legislation or regulations being considered. In addition, we may analyze and take public positions on issues related to the operation of PDT or our IPA clients. These efforts are coordinated through our directors.

Is this a business dinner or a political event?

Q: I bought tickets to a fundraising dinner for a local politician. I took a colleague and we did discuss business. May I expense it?

A: No. Reimbursing you for funds given to a specific candidate would be the same as contributing to his/her political campaign, which PDT is not allowed to do.

Confidentiality

We work in an industry that contains highly sensitive information—the confidentiality of which is also highly regulated. Every PDT employee must be aware of what confidential and proprietary information is, and maintain the security of both company and member information according to the rules, regulations, and sub-regulatory guidance provided by the government (as well as other legal and ethical standards). To review our full policy, see the section on Confidentiality in the Employee Handbook.

> ***Confidential*** means that it is not appropriate for general public knowledge; it may cause harm to an individual or organization if that information becomes public knowledge.
>
> ***Proprietary*** means that it is related to or involves PDT. Other companies and individuals would also have proprietary information specific to them.

PDT's confidential and proprietary information is nonpublic information that is created, recorded, or used in support of PDT business. It involves much of our daily work processes and outputs—including PDT's plans and strategies.

Our members' confidential and proprietary information is called "Protected Health Information," or "PHI." Safeguards to protect PHI are described in PDT's Privacy/Security Program.

PDT Company Information

In general, you should discuss proprietary information with co-workers on a "need-to-know" basis. Your HIPAA (The Health Insurance Portability and Accountability Act of 1996) training included information on these two important concepts:

- **Role-Based Access** means you have access to certain information depending on the tasks you perform at PDT. That same access may not be granted to your co-worker.
- **Minimum Necessary Requirement** means that you use or disclose only the information necessary to satisfy a particular purpose or carry out a function.

For requests for information from persons outside PDT, follow your job-specific procedures for requesting and granting confidential information. A good guideline to use is that if it's on the PDT's public website, then it's public. You can direct any interested parties to that information. If you have questions on anything else, talk to your supervisor.

You should never discuss any confidential information (HIPAA or otherwise) at all in social or routine business conversations. Again, refer to the policy on Confidentiality in your Employee Handbook.

Conversation or confidential information?

Q: At a family event a relative was asking me very specific questions about PDT – about open enrollment and membership and what we learned at our latest employee forum. What's okay to share?

A: Membership numbers are generally public information. Where those numbers are in relation to our goals, however, is not public. Please ask if it's okay to share something specific you may have learned.

Protected Health Information

Protected Health Information, or PHI, is information that both identifies a member and relates to their past, present, or future health or condition, provision of care, or payment for care.

There are some PDT employees who never or rarely come across PHI. For others, their jobs may revolve around processing PHI. Regardless, we are all responsible for protecting our members' health information. You must always abide by your job-specific procedures for handling and protecting PHI.

What do I do about repeated requests?

Q: My co-worker keeps asking me for more information than I think she needs to do her job. Do I just keep saying no?

A: Try to find out why she thinks she needs the information in question. If she needs it to do her job, then it is appropriate. If not, then you need to remind her of PDT's 'minimum necessary' standard. If you can't come to an agreement between the two of you, talk to your supervisor.

Can I post good news?

Q: I'm a case manager and I love to post updates of some of my favorite members on my Facebook page. Is this okay?

A: No, it's not. Remember, once you send information electronically, you have no control over where it will end up. Your posts could inadvertently include PHI or company information about the services we provide.

Privacy Guidelines

- Be attentive to PHI that you may handle as part of your daily job.
- Be aware of documents with PHI on shared printers, fax machines and copiers, and take abandoned documents to your supervisor.

- Immediately retrieve your own documents with PHI.
- Don't discuss PHI where others might hear.
- Always encrypt emails that contain PHI when emailing outside of PDT domains.
- Protect your passwords.
- Lock your workstation— Strike at-the-same-time the Ctrl+Alt+Del keyboard buttons, and then following that the "Enter" key when you leave your work station.
- Do not compromise PDT's electronic assets.
- Don't connect personal devices to the PDT network unless you have IT approval.
- Save information only to PDT Network Drives.
- Don't open attachments with odd endings (i.e. "ese" or "vbs") or from people you don't know.
- Report any suspected breaches of PHI to PDT's Compliance Officer or to the Compliance Department through any of the avenues of communication identified in this Code.

Many employees have access to other member, employee, or vendor information that, while not considered PHI, must also be kept confidential. Refer to the Employee Handbook section on Confidentiality for more detail.

PDT Assets

It's easy to remember: If PDT supplied it to you, it is PDT's property and considered a PDT asset. Be aware, too, that assets include more than just equipment and supplies. PDT records, financial data, research results, business strategies, etc., are also assets to be protected. The Employee Handbook includes more information on PDT property and rights to inventions.

What if it's for a good cause?

Q. I volunteered to make flyers for the local animal shelter. May I use my department's machine to make photocopies? What if I bring my own paper?

A. No, sorry. Unless it's for an organization or event PDT is supporting, you may not and should not use PDT assets to promote it.

Physical Property

While it is PDT's responsibility to maintain equipment, it is your responsibility to take care of it and report any problems or issues.

For the most part, PDT property must remain on-site unless approval has been given to remove it—or it is part of your job function. It should go without saying that taking or using supplies, materials or equipment for personal use is dishonest and not allowed.

Electronic Communications Systems and Social Media

In the Employee Handbook you will see a robust policy on the use of electronic communications systems and social media. Please read it thoroughly. This is an area that is growing and changing quickly so we simply cannot anticipate all challenges. But again, you can help ensure appropriate use by using PDT's electronic communications systems for business purposes only. For social media, make sure that your participation on external social media sites is done on your time and that you limit the references made to PDT and the work you do here.

Intellectual Property

Intellectual property ranges from the PDT logo to trade secrets to any programs you may have helped to develop. Like physical assets, intellectual property belongs to PDT and must be used only as designated. When you leave and are no longer affiliated with PDT, all PDT property, resources and confidential information must remain with PDT.

Finally, PDT also respects the confidential and proprietary rights and intellectual property of other companies and individuals. We abide by all applicable laws regarding copyright, trademarks, privacy and financial disclosures. We follow fair business practices, which mean we do not use improper channels to glean information about competitors, nor do we spread false information about them.

Dealing with an "Excluded Person or Entity"

An excluded person or entity is one that is not allowed to participate in any federal health care programs for any reason. Most commonly, these are individuals that have been found guilty of fraudulent billing or misrepresentation of credentials. PDT cannot, directly or indirectly, employ or contract with any excluded person or entity. PDT must ensure that no persons or entities contracted or affiliated with PDT are "excluded." If a person or entity contracted with PDT becomes excluded, PDT must immediately stop such person or entity from directly or indirectly providing any covered services for reimbursement to PDT members. To read about our policy on this issue, please refer to PDT's policy regarding Exclusion Screenings.

PDT Compliance Program

PDT contracts with health care insurers to administer covered services for enrolled beneficiaries. We administer these services to enrolled beneficiaries in accordance with PDT's contractual and regulatory requirements as set forth by governing federal and state agencies, and our affiliated health care insurers. The PDT Compliance Program helps ensure that PDT has systems and processes in place to comply with the laws, regulations, regulatory guidance and contract provisions that we are required to follow. Everyone has a role to play in making our Compliance Program effective.

The 5 Things You Need to Know About Compliance

1. We are all responsible for compliance.
2. If you don't understand something, speak up!
3. If you suspect a compliance issue, you must report it.
4. All reports are investigated and treated confidentially.
5. Anyone who makes a report in good faith will be protected from retaliation and intimidation.

Your Responsibilities and Obligations

The first step is to understand that you are responsible for and obligated to help prevent, detect and correct instances of potential non-compliance. To make sure we are able to recognize and properly handle potential non-compliance issues, PDT is committed to:

- All-employee compliance training.
- Job-specific training and education.
- Implementing our policies and procedures.
- Enforcing our standards through disciplinary actions.
- Routine auditing and monitoring.
- Communicating on general and specific compliance topics.
- Reporting compliance activities.
- Proactively monitoring performance and self-disclosing non-compliance to federal and state regulators.

Potential Compliance Issues

Potential compliance issues exist when a business process or behavior does not follow or is inconsistent with the Code of Conduct, laws, regulations, sub-regulatory guidance, contractual obligations, or policies and procedures.

Fraud, Waste, and Abuse (FWA)

Fraud, waste and/or abuse are special types of potential compliance issues. FWA is a big problem in federal health care programs, and we are obligated to report any FWA issues we see in our day-to-day jobs. FWA can be committed by providers, brokers, health plans, pharmacies, pharmacy benefit management companies, our members, and even our fellow employees.

In addition, it is illegal to knowingly present, or cause to be presented, a false or fraudulent claim or statement to the government (False Claims Act). False claims, fraud, dishonesty, or criminal conduct of any sort, on the part of any employee, officer, director, or anyone doing business with PDT will not be tolerated.

Do we report on our members?

Q: I think a member let someone else use her Health Plan ID card. Should I call her to double check?

A: No. This could be member fraud. So report it, along with the details that made you suspicious in the first place.

Here is the definition of FWA:

Fraud. An intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to himself or some other person. It includes any act that constitutes fraud under applicable federal or state law. Examples: Double-billing, forging or altering prescriptions and billing for more expensive procedures than were actually provided.

Waste. To use health care benefits or spend health care dollars in a careless or needless manner. Examples: Duplicative, inappropriate or unnecessary tests and procedures; preventable hospital readmissions; and medical errors.

Abuse. Practices that are inconsistent with sound fiscal, business, or medical practices, and result in an unnecessary cost to federal healthcare programs or to PDT. Examples: Reimbursement for services that are not medically necessary or that fail to meet professionally recognized standards for health care.

PDT's Fraud, Waste, and Abuse (FWA) Program

As part of the overall Compliance Program, PDT conducts various anti-fraud activities. The purpose of the FWA Program is to increase awareness of and improve prevention, detection, and the investigation and (as necessary)

prosecution of health care fraud. These efforts are making a difference. Every employee is trained on FWA when newly hired and must take a refresher course every year as part of the compliance-required trainings. Our vigilance in this area can help protect PDT and maintain the quality and affordability of health care.

A provider mistake or member abuse?

Q: I was processing a member claim and noticed the first name is different—the member is male but there's a woman's name on the claim. The doctor's office probably made a mistake, right?

A: Don't assume it's a mistake—report it. The member may be trying to get reimbursed for care someone else received.

Delivering quality care or abusing the system?

Q: I've noticed one physician orders extensive lab work regardless of the members' diagnosis. Is he just being extra thorough or is this an issue?

A: You need to report this so we can find out. Ordering and getting reimbursed for unnecessary tests is considered abuse.

How to Report a Potential Compliance Issue, including FWA

All employees, officers, Board Members and other persons affiliated with PDT have a duty to immediately report potential compliance issues, which includes suspected fraud, waste, and/or abuse. You have several ways to report a suspected violation:

- Your supervisor—supervisors have an obligation to, in turn, report the suspected violation to Human Resources and/or Compliance.
- Human Resources staff
- The PDT Compliance Officer or Department
- Or, any contracted health plan's reporting mechanisms
- For more information, see *Reporting* on page 5.

What if I see fraud outside of PDT?

Q: I was at a meeting with a broker, and I learned that he misrepresented PDT to a member. What do I do?

A: Bring this to your manager's attention immediately. If it was an honest mistake, that's one thing. If it's a pattern of fraudulent behavior, that's something very serious.

Compliance FAQs

Who is responsible for compliance?

Compliance is everyone's responsibility. You are part of the solution in detecting, correcting, and preventing compliance incidents and FWA.

What are my responsibilities?

You are required to comply with all applicable requirements and help in the effort to prevent, detect, and correct Medicare non-compliance and FWA by reporting any suspected FWA or non-compliance issues in a timely manner.

How do I know if something is a potential compliance issue?

A potential compliance issue exists when a business process or behavior does not follow or is inconsistent with this Code, laws, regulations, sub-regulatory guidance, contractual obligations, and/or policies and procedures. One of the purposes of our compliance-related training and annual refresher courses is to help you identify these situations.

What if I don't understand a rule or regulation?

Not understanding does not excuse you from complying. If you don't fully understand a rule, regulation, policy or procedure: Speak up! There are several ways to get clarification:

1. Ask your supervisor. It's their job to explain it clearly.
2. Submit your question to compliance@pdtrust.com, and Compliance staff will respond.
3. Ask the Compliance Officer.

What do I do if I suspect a potential compliance issue?

We embrace the concept of shared compliance at PDT. That means we are all responsible for it, regardless of job title or responsibilities. If you suspect a compliance issue, you are obligated to report it as soon as possible. You do not have to find out many details, but you do need to have the basic facts: who, what, when, and where. Then report through one of the listed avenues.

How do I report a compliance issue?

Report the issue to your supervisor—unless of course it is your supervisor who is involved. If that's the case, then use any of these other ways to report:

1. Your supervisor—supervisors have an affirmative obligation to, in turn, report the suspected violation to Human Resources and/or Compliance.
2. Human Resources staff
3. The PDT Compliance Officer or Department
4. Or, any contracted health plan's reporting mechanisms.

For more information, see *Reporting* on page 5.

What obligations do I have as a manager?

Q: One of my employees just came to me with something he thinks is a potential compliance issue. I'm not sure it is. What do I do?

A: Talk to your supervisor to get clarification. Or, if you prefer, you or the employee who brought it to your attention can report it through the other various means. The employee did the right thing by reporting it to you, so it is your responsibility and affirmative obligation to report the suspected violation to Human Resources and/or Compliance.

What happens if I don't report something that turns out to be a compliance issue?

You are obligated to report. If you have been through PDT compliance training—and you are required to go through it both as a newly hired employee and annually thereafter—you will be able to identify potential compliance issues. If you do not report a situation that you reasonably should have identified as a potential compliance issue, you will be subject to disciplinary action. That's why we make it as easy as possible for you to report potential compliance issues. As noted here, you have several ways to report and can even do so anonymously.

What happens after I report a potential compliance issue?

To most of your co-workers and other employees it may seem like nothing is happening. But every reported issue will be investigated. Documents are reviewed, the people involved are interviewed, and you may be asked for additional, clarifying information. The results of the investigation may be presented to PDT's Compliance Committee and/or the CEO. The actions taken as a result of the investigation will depend on the severity of the issue. It could be something as simple as implementing a new policy or procedure, or it could include disciplinary action up to and including immediate termination of those involved.

Will I be treated differently if I report a potential compliance issue?

No. There should be no difference in your workplace duties, responsibilities or relationships. In fact, PDT has a policy against retaliation and intimidation of whistleblowers or those that report potential issues in good faith. PDT will not tolerate anyone retaliating against you or trying to intimidate you when you have reported something in good faith. If you feel you are being retaliated against or intimidated, contact Human Resources or use your other available reporting mechanisms to report it. As a reminder, these channels are anonymous and available 24/7 to report issues related to non-compliance and unethical or illegal activities.

Why do I have to take compliance training every year?

Compliance—meeting our legal and contractual requirements—is not optional for PDT. Annual compliance training is a requirement of our managed care contracts. That makes it a requirement for PDT employees. If you don't complete and maintain your training, you will be subject to disciplinary action. Because regulations and requirements change, we work to keep the training up-to-date and relevant. The better trained you are, the better you will be able to spot potential compliance issues and know what to do once you see them.

Where can I find additional compliance information?

Additional resources can be found at pdtrust.com/compliance, or by request to the PDT Compliance Officer.

PDT Compliance Officer: Karen Palmer, CHC
(562) 860-8771 x114 | compliance@pdtrust.com
161 Thunder Dr, Suite 212 | Vista, CA 92083 | ATTN: Compliance Office

Appendix A: Health Plan Compliance & FWA Reporting Information

Health Plan	Hotline	Web/Email
Aetna	(888) 891-8910	aetna.alertline.com
Alignment Health	(877) 222-1541	www.lighthouse-services.com/ahcusa reports@lighthouse-services.com
Anthem Blue Cross	(877) 725-2702	ethicsandcompliance@anthem.com
Blue Shield	(877) 837-6057	https://bsccomplianceandethics.alertline.com
Central Health Plan	(866) 606-3889	Molinahealthcare.alertline.com
Health Net	(800) 977-3565	Report to HealthNet
Humana	(800) 614-4126	siureferrals@humana.com
Imperial Health Plan	(888) 708-5377	complianceFWA@imperialheatlhplan.com
LA Care	(800) 400-4889	Report to LA Care
SCAN	(877) 863-3362	www.ethicspoint.com
Sharp	(800) 350-5022	www.mycompliancereport.com
United Healthcare	(844) 359-7736	ethicsoffice@uhc.com www.uhghelpcenter.ethicspoint.com
Wellcare (Centene)	(866) 685-8664	www.ethicspoint.com compliance@centene.com

Appendix B: Reporting Compliance & FWA Concerns Poster

PHYSICIANS DATATRUST **Reporting Compliance & FWA Concerns**

Suspected or confirmed non-compliance, fraud, waste or abuse (FWA) / False Claims Act violations, or concerns regarding data privacy/security must be reported immediately. Reporting mechanisms are available 7 days a week, 24 hours a day, and allow the reporting party to remain anonymous.

Compliance Officer: *Karen Palmer, CHC*
phone: (562) 860-8771 x114 | email: compliance@pdtrust.com
mail: 161 Thunder Dr, Suite 212 | Vista, CA 92083 | ATTN: Compliance Office

Any employee or downstream entity who suspects non-compliance or fraud, waste, or abuse (FWA), and reports in good faith is protected against any form of retaliation or retribution.

Reports may include:

1. *Privacy/security concerns:* HIPAA non-compliance, unsecured PHI, PHI sent to or received by an unintended recipient, suspicious emails, equipment or system malfunction; unusual requests for PHI from coworkers, vendors, or other parties
2. *Non-compliance:* Lack of adherence to Federal or state regulations, company policies and procedures, or affiliated health plan standards.
3. *Abuse:* Payment for items or services which result in unnecessary cost to the Medicare program. In the case of waste or abuse, the action may occur without deceptive intentions, but may be the result of poor or insufficient methods.
4. *Fraud:* Deliberate misrepresentation for financial gain. In the case of fraud, the individual knowingly falsifies information or services for illicit personal benefit or the benefit of another person.
5. *Waste:* Inefficient or disorganized practices or decisions which result in the excessive or needless expense of healthcare benefits or services.
6. *False Claims Act* (FCA): Federal act that prohibits any person from knowingly presenting, or causing to be presented, to an officer or employee of the United States Government a false or fraudulent claim for payment or approval. It prohibits from knowingly making, using, or causing to be made or used, a false record or statement to get a false or fraudulent claim paid or approved by the Government. It prohibits from conspiring to defraud the Government by getting a false or fraudulent claim allowed or paid.

   The Qui Tam provision of the FCA allows a private person, known as a "relator," to bring a lawsuit on behalf of the United States, where the private person has information that the named defendant has knowingly submitted or caused the submission of false or fraudulent claims to the United States. The relator need not have been personally harmed by the defendant's conduct.
7. *Anti-Kickback Statute:* Prohibits offering, paying, soliciting or receiving anything of value to induce or reward referrals or generate Federal health care program business
8. *The Stark Law:* Prohibits a physician from referring Medicare patients for designated health services to an entity with which the physician (or immediate family member) has a financial relationship, unless an exception applies. Prohibits the designated health services entity from submitting claims to Medicare for those services resulting from a prohibited referral.

This information is posted in all Physicians DataTrust office locations and is part of our compliance training materials.

You are encouraged to use this poster in your compliance training activities and post it in high-traffic areas in your office.

Reporting C&FWA Concerns 2023.pdf