

BOARD AUDIT & COMPLIANCE COMMITTEE

MEETING AGENDA

Tuesday, February 18, 2025

4:00 p.m.

Please see page 2 for meeting location options

The Board may take action on any of the items listed below, including items specifically labeled "Informational Only"		Time	Form A Page	Target
Call To Order				
I.	Establishment of Quorum	1		4:00
II.	Public Comments¹	30		4:30
III.	Action Item(s) (ADD A)			
	a. Audit & Compliance Committee Minutes, November 19, 2024 (Pp 6-8)	5		4:35
	b. Audit & Compliance Committee Charter Review (Redline Pp 9-11, Clean Pp 12-14)	5		4:40
	c. 2025 Audit & Compliance Committee Standing Agenda Calendar (Pp 15)	5		4:45
	d. 2025 Tentative Compliance Audit Schedule (Pp 16)	5		4:50
	e. 2025 Employee Code of Conduct Update (Pp 17-41)	5		4:55
	f. Review/Recommendation of Qualified Audit Firm to Conduct Annual Audit for FY2025	5		5:00
IV.	Adjourn to Closed Session	1		5:01
	a. Pursuant to California Government Code § 54956.6 — CONFERENCE WITH LEGAL COUNSEL— ANTICIPATED LITIGATION — Significant exposure to litigation pursuant to paragraph (2) or (3) of subdivision (d) of Section 54956.9: One (1) potential case	15		5:16
V.	Re-Adjourn to Open Session	1		5:17
VI.	Action Resulting from Closed Session	1		5:18
Final Adjournment				

Board Audit & Compliance Committee Members

Voting Members	Non-Voting Members
Michael Pacheco, Chair	Diane Hansen, President & CEO
Laurie Edwards-Tate, MS, Director	Kevin DeBruin, Esq., Chief Legal Officer
Linda Greer, RN, Director	Helen Waishkey, Corporate Compliance Officer
Alternate Voting Members	Baroon Rai, M.D., Physician Representative
Jeff Griffith, EMT-P – 1 st Board Alternate	

Note: If you need special assistance to participate in the meeting, please call 760.740.6375, 72 hours prior to the meeting so that we may provide reasonable accommodations.

¹ 3 minutes allowed per speaker. For further details, see Request for Public Comment Process and Policy on page 3 of the agenda.

Board Audit & Compliance Committee Meeting Location Options

Linda Greer Board Room

2125 Citracado Parkway, Suite 300, Escondido, CA 92029

- Elected Board Members of the Palomar Health Board of Directors will attend at this location, unless otherwise noticed below
- Non-Board member attendees, and members of the public may also attend at this location

<https://www.microsoft.com/en-us/microsoft-teams/join-a-meeting?rtc=1>

Meeting ID: 261 766 449 786

Pass Code: dBa5LC

or

Dial in using your phone at 929.352.2216; Access Code: 966 788 506#¹

- Non-Board member attendees, and members of the public may also attend the meeting virtually utilizing the above link

¹ New to Microsoft Teams? Get the app now and be ready when your first meeting starts: [Download Teams](#)

Policy : Public Comments and Attendance at Public Board Meetings

I. PURPOSE:

A. It is the intention of the Palomar Health Board of Directors to hear public comment about any topic that is under its jurisdiction. This policy is intended to provide guidelines in the interest of conducting orderly, open public meetings while ensuring that the public is afforded ample opportunity to attend and to address the board at any meetings of the whole board or board committees.

II. DEFINITIONS:

A. None defined.

III. TEXT / STANDARDS OF PRACTICE:

- A. There will be one time period allotted for public comment at the start of the public meeting. Should the chair determine that further public comment is required during a public meeting, the chair can call for such additional public comment immediately prior to the adjournment of the public meeting. Members of the public who wish to address the Board are asked to complete a [Request for Public Comment form](#) and submit to the Board Assistant prior to or during the meeting. The information requested shall be limited to name, address, phone number and subject, however, the requesting public member shall submit the requested information voluntarily. It will not be a condition of speaking.
- B. Should Board action be requested, it is encouraged that the public requestor include the request on the *Request for Public Comment* as well. Any member of the public who is speaking is encouraged to submit written copies of the presentation.
- C. The subject matter of any speaker must be germane to Palomar Health's jurisdiction.
- D. Based solely on the number of speaking requests, the Board will set the time allowed for each speaker prior to the public sections of the meeting, but usually will not exceed 3 minutes per speaker, with a cumulative total of thirty minutes.
- E. Questions or comments will be entertained during the "Public Comments" section on the agenda. All public comments will be limited to the designated times, including at all board meetings, committee meetings and board workshops.
- F. All voting and non-voting members of a Board committee will be seated at the table. Name placards will be created as placeholders for those seats for Board members, committee members, staff, and scribes. Any other attendees, staff or public, are welcome to sit at seats that do not have name placards, as well as on any other chairs in the room. For Palomar Health Board meetings, members of the public will sit in a seating area designated for the public.
- G. In the event of a disturbance that is sufficient to impede the proceedings, all persons may be excluded with the exception of newspaper personnel who were not involved in the disturbance in question.
- H. The public shall be afforded those rights listed below (Government Code Section 54953 and 54954).
1. To receive appropriate notice of meetings;
 2. To attend with no pre-conditions to attendance;
 3. To testify within reasonable limits prior to ordering consideration of the subject in question;
 4. To know the result of any ballots cast;
 5. To broadcast or record proceedings (conditional on lack of disruption to meeting);
 6. To review recordings of meetings within thirty days of recording; minutes to be Board approved before release,
 7. To publicly criticize Palomar Health or the Board; and
 8. To review without delay agendas of all public meetings and any other writings distributed at the meeting.
- I. This policy will be reviewed and updated as required or at least every three years.

Board Audit & Compliance Committee Meeting

Meeting will begin at 4:00 p.m.



Request for Public Comments

If you would like to make a public comment, please submit a request by doing the following:

- **In Person: Submit Public Comment Form, or verbally submit a request, to the Board Assistant**
- **Virtual: Enter your name and “Public Comment” in the chat function once the meeting opens**

Those who submit a request will be called on during the Public Comments section and given 3 minutes to speak.

Public Comments Process

Pursuant to the Brown Act, the Board of Directors can only take action on items listed on the posted agenda. To ensure comments from the public can be made, there is a 30 minute public comments period at the beginning of the meeting. Each speaker who has requested to make a comment is granted three (3) minutes to speak. The public comment period is an opportunity to address the Board of Directors on agenda items or items of general interest within the subject matter jurisdiction of Palomar Health.

ADDENDUM A

Board Audit and Compliance Meeting Minutes – Tuesday, November 19, 2024

AGENDA ITEM

CONCLUSION/ACTION

DISCUSSION

NOTICE OF MEETING

Notice of Meeting was posted at the Palomar Health Administrative Office at 2125 Citracado Parkway, Escondido, CA. 92029; also posted with agenda packet on the Palomar Health website on Wednesday, November 13, 2024.

CALL TO ORDER

The meeting, which was held in the Linda Greer Board Room at 2125 Citracado Parkway, Suite 300, Escondido, CA. 92029, and virtually, was called to order at 4:10 p.m. by Chair Michael Pacheco

I. ESTABLISHMENT OF QUORUM

- Quorum comprised of: Chair Michael Pacheco, Director Laurie Edwards-Tate and Director Linda Greer
- Excused Absences:

II. PUBLIC COMMENTS

- No public comments

III. ACTION ITEMS

a. Minutes: Board Audit and Compliance Meeting, Tuesday, August 20, 2024

MOTION by Director Greer, 2nd by Director Pacheco to approve the August 20, 2024, meeting minutes as written. Roll call voting was utilized.

Director Edwards-Tate - absent
Director Greer – aye
Director Pacheco - aye

Two in favor. None opposed. One absent. None abstained.
Motion approved.

DISCUSSION:

- No discussion

Note: Director Laurie Edwards-Tate joined the meeting at 4:12 p.m.

b. Hotline Report

NO ACTION TAKEN

DISCUSSION:

- No discussion

c. Streamline Dashboard

NO ACTION TAKEN

DISCUSSION:

- *No discussion*

IV. Adjourn to Closed Session

- a. Pursuant to California Government Code § 54956.6 — CONFERENCE WITH LEGAL COUNSEL—ANTICIPATED LITIGATION — Significant exposure to litigation pursuant to paragraph (2) or (3) of subdivision (d) of Section 54956.9: One (1) potential case

V. Re-Adjourn to Open Session

VI. Action Resulting from Closed Session

- *No action resulting from closed session*

FINAL ADJOURNMENT

Meeting adjourned by Committee Chair Pacheco at 4:43 p.m.

SIGNATURES:

Committee Chair

Michael Pacheco

Committee Assistant

Carla Albright

CHARTER
of the
AUDIT and COMPLIANCE COMMITTEE
of the
PALOMAR HEALTH BOARD OF DIRECTORS

- I. **Purpose.** The Audit and Compliance Committee (“Committee”) of the Palomar Health Board of Directors (“Board”) aims to determine and establish that appropriate review mechanisms and management assets and resources of the Palomar Health Local Healthcare District (“District”) are in place and that the District complies with all applicable state and federal regulations relative to the audit and financial stewardship of the District.
- II. **Membership.**
- A. Voting Membership. The voting members (“Voting Members”) of the Committee may consist of those individuals appointed as Voting Members of the Committee by the Chair of the Board (“Board Chair”) in accordance with the Bylaws of Palomar Health (“Bylaws”) and other applicable policies of the Board.
- B. Alternate(s). Any alternate voting members (“Alternates”) of the Committee may consist of those individuals appointed as Alternates of the Committee by the Board Chair in accordance with the Bylaws and other applicable policies of the Board. Alternates enjoy voting rights only in the absence of a Voting Member. Unless Alternates enjoy voting rights, they may attend the meetings of the Committee only as an observer.
- C. Non-Voting Membership. The non-voting members (“Non-Voting Members”) may consist of the following individuals:
- President and CEO of Palomar Health
 - Chief Legal Officer of Palomar Health
 - Corporate Compliance Officer of Palomar Health
 - One (1) physician representative, recommended by the Palomar Health Administration and approved and appointed by the Committee Chairperson
- III. **Authority.** The Committee has no expressed or implied power or authority except to make recommendations to the Board related to the Committee’s purpose and duties as described in this Charter.

- IV. **Duties.** The duties of the Committee may include:
- A. Routinely reviewing the system of internal controls for the organization.
 - B. Recommending a qualified audit firm to complete independent financial audits of the system and reviewing reports, management letters and recommendations from the firm to assure compliance with recognized audit principles and standards.
 - C. Keeping up with trends in the field of health care audit and compliance to help educate other Board members on the latest trends in the industry.
 - D. Approving and reviewing the effectiveness and overall audit scope including but not limited to financial statements, external/internal audits, compliance, internal controls and reporting responsibilities.
 - E. Recommending to the Board the approval of the organization's annual audit reports.
 - F. Reviewing annually those policies within its purview and report the results of such review to the Board. Such reports shall include recommendations regarding the modification of existing or creation of new policies.
 - G. Assessing and monitoring the independent status of the outside independent auditors.
 - H. Directing special investigations for the Board that deal with non-compliance activities.
 - I. Performing such other duties as may be assigned by the Board.
- V. **Committee Chairperson, Liaison, and Assistant.**
- A. The Chairperson of the Committee ("Committee Chairperson") may be the individual appointed as Committee Chairperson by the Board Chair in accordance with the Bylaws and other applicable policies of the Board.
 - B. The Corporate Compliance Officer may serve as the Palomar Health Administration's liaison ("Administrative Liaison") to the Committee.
 - C. The Executive Assistant to the Chief Legal Officer ~~Compliance-Program Analyst~~ may serve the assistant to the Committee ("Committee Assistant").
- VI. **Meetings.** The Committee will meet at least quarterly and more often as needed. A majority of the Voting Members will constitute a quorum. The Committee Assistant will record the meeting minutes and forward a copy to the Board Secretary upon

approval of the meeting minutes by the Committee. The Committee Chairperson may coordinate with the Administrative Liaison to invite any officer, staff member, expert or other advisor who is not a member of the Committee to attend a meeting of the Committee to discuss topics germane to the purpose and duties of the Committee.

VII. Committee Agendas.

A. The Committee Chairperson holds the primary responsibility for creating Committee Meeting Agendas. The Committee Chairperson will routinely work with the Administrative Liaison and the Committee Assistant in creating agendas. The Committee Chairperson will carefully consider all input regarding agenda items from the Administrative Liaison. The authority for approval of final agendas for Committee Meetings will reside with the Committee Chairperson. Any disagreement, dispute, or confusion over specific agenda items and/or the appropriateness of specific items on the agenda between the Committee Chairperson and the Administrative Liaison that cannot be resolved will be referred to the Board Chair for resolution. The Board Chair, if indicated, may consult with Board or Corporate Counsel, the CEO, and/or other members of the Administration team to achieve resolution. If the Board Chair feels the issue cannot be satisfactorily resolved, the Board Chair will take the issue to the full Board.

B. Individual Committee Members may request to place items on a Committee Meeting Agenda. Board Members who are not Committee Members may request to have items placed on a Committee Meeting Agenda at regular meetings of the Full Board either through the Board Chair or the Committee Chairperson. The Committee Chairperson will consider each item so requested and determine whether or not it is an appropriate Committee Agenda item. The Committee Chairperson will make every effort to accommodate all reasonable individual Member requests including refining the requested agenda item as indicated. The Committee Chairperson may decline to put the item on a Committee Agenda based upon his or her judgment. Any disagreement, dispute or confusion over specific agenda items and/or the appropriateness of specific items on the agenda between the Committee Chairperson and Member that cannot be resolved will be referred to the Board Chair for resolution. The Board Chair may consult with the Board or Corporate Counsel, the CEO and/or other members of the Administration team to achieve resolution. If the Board Chair ~~determines-feels~~ the issue cannot be satisfactorily resolved, the Board Chair will take the issue to the full Board.

VIII. **Review and Revision.** The Committee may review this Charter annually. Any revisions proposed by the Committee to this Charter must be approved by the Board in accordance with the Bylaws.

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of the
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**Board Audit and Compliance Calendar 2025
Standing Agenda Items**

FEBRUARY 18, 2025

Approve 2025 Board Audit and Compliance Committee Standing Agenda Items (contained within)
Approve Committee Meeting Schedule for Calendar Year 2025 -below
Approve 2025 Palomar Health Compliance Audit Schedule
Review of Internal Audit Results from 4th Quarter 2024

MAY XX, 2025

Review of Internal Audit Activities
Bi-annual Compliance Hotline Report
Compliance Updates, as applicable

AUGUST XX, 2025

Preparation of Financial Audit
Review of Internal Audit Activities
Compliance Updates, as applicable

NOVEMBER XX, 2025

Compliance Updates
Review of Internal Audit Activities
HHS/OIG Updates, as applicable
End of Year Compliance Hotline Report

FEBRUARY XX, 2026

Approve 2026 Board Audit and Compliance Committee Standing Agenda Items
Approve Committee Meeting Schedule for Calendar Year 2026
Approve 2026 Palomar Health Compliance Audit Schedule
Review of Internal Audit Activities-Results from 2025

2025 Compliance Audit Schedule

The below is subject to change. The dates listed below are Tentative.

Area of Audit	Quarter	Sample Size	Vendor Required	RFP Required	Comments	Date
Claims (Code "07" AMA Discharges)	2nd	Universe	No	No	Review the Code ""07" discharges which signifies left against medical advice (AMA). 1. How was the health care received?, 2. Has the patient returned? Did the patient expire? Was the patients condition worse upon return? 3. What ethnicity was the patient?	April-June
Medical Records	2nd	100 files - 75 hospital and 25 SNF	No	No	Due to the uptick in OCR fines and push for organizations to provide timely access and timely processing of medical record requests we want to audit our Medical Records department with regards to hospital and The Villas as the timeframes required are different.	April-June
CPE	1st	N/A	Not in years 2 - 3	No	We utilized a vendor in 2023 so in years 2024 and 2025 we will perform the internal review and then in 2026 will obtain an outside contractor again.	January-February
Vendor Master List vs. Exclusion List	Monthly	Entire Universe	No	No	Review and compare Vendor Master List to what is being submitted to our Exclusions vendor	ON HOLD
Trashbin Audit/employee interviews	2nd	multiple elements	No	No	Together with Privacy and EVS we will sort through floor garbage cans and green bins on loading docks and cages for hazardous, medical, pharmaceutical, PHI and e-waste	ONSITE - May/June
Vendor BAA Attestation	2nd-3rd	555 total vendors had to be vetted in 2023	No	No	As required by HIPAA every vendor who has a BAA has to complete the HIPAA/HITECH/Compliance attestation on an annual basis. Once completed any BAA found to have terminated Compliance will share the list with Finance and Supply Chain	
Signage Audit	2nd	List of required signage	No	No	This is not a sample size Compliance has a list of all the signage that is required for Hospital and SNF	ONSITE - May/June
COI Audit	2nd	~400 staff	No	No	any employee supervisor/manager and above are required to complete the COI upon hire and annually. This is the annual audit	June 1 emails go out
Important Message from Medicare (IMM) 1 & 2 Notices	1st & 4th	60	No	No	Compliance will review patient files to ensure we are meeting the distribution requirement	January/ November
NSA Audit	1st & 4th	60	No	No	Compliance will review patient files to ensure we are meeting the distribution requirement	January/ November
MOON Audit	1st & 4th	60	No	No	Compliance will review patient files to ensure we are meeting the distribution requirement	January/ November
Website Review	4th	List of requirements	No	No	Compliance will review the PalomarHealth.org external site to ensure it is compliant	December
EMTALA	3rd	60	No	No	Compliance will review patient files to ensure we are meeting the EMTALA requirement	September
Physician NonMonetary Log Review	4th	All	No	No	Compliance will review the Non-Monetary Physician Log kept by the CMO's office to ensure we are meeting the limits set by CMS	December



LIVING OUR VALUES

CODE OF CONDUCT

Board of Director Approved 3.13.2023



Message from the CEO

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

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

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

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

Sincerely,

Diane Hansen
President and CEO

Our Mission

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

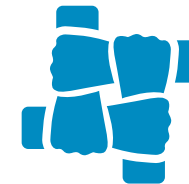
Our Vision

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

Our Values



Excellence



Teamwork



Service



Compassion



Trust



Integrity

Navigating the Code of Conduct

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What is the Code of Conduct?

Why is it Important to Me?

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

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

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

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

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

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

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



Ethical Self-Assessment

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



EXCELLENCE



Aspiring to be the best

EXCELLENCE BEHAVIOR STANDARDS

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

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

-A grateful Palomar Health patient



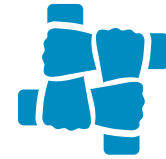
Providing Safe, Extraordinary Care

What You Need to Know

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



TEAMWORK



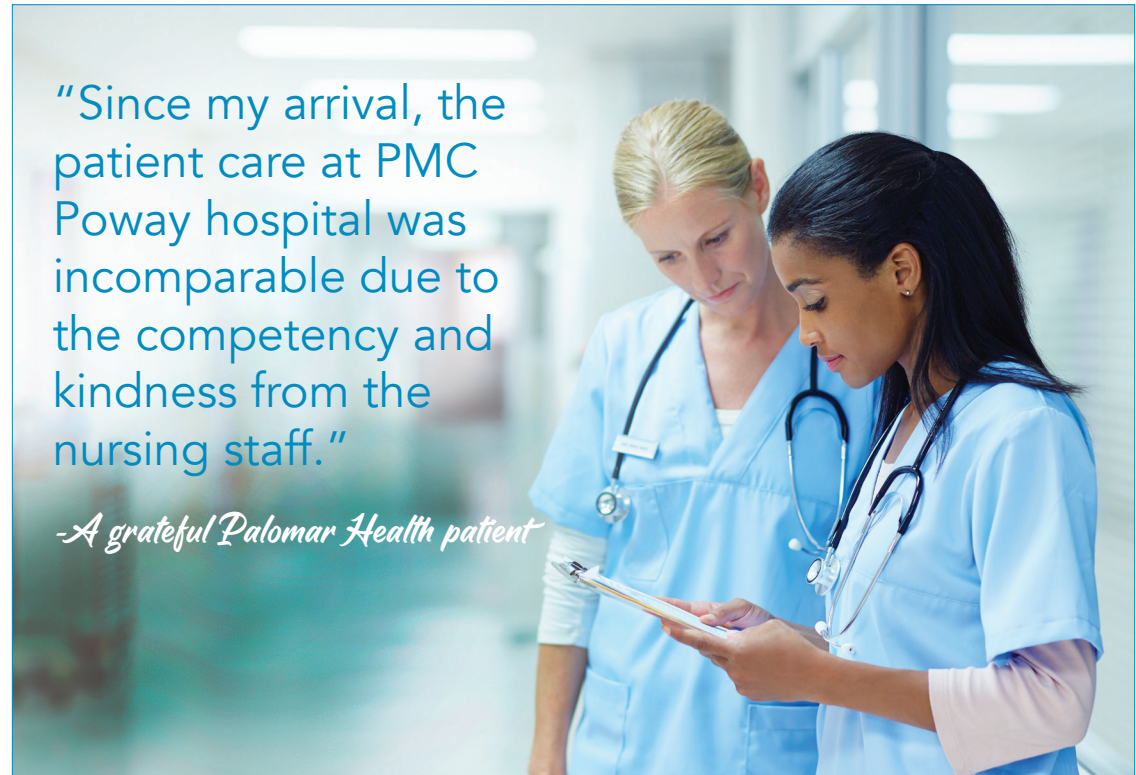
Working together toward shared goals

TEAMWORK BEHAVIOR STANDARDS

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

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

-A grateful Palomar Health patient



Employee Responsibility

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

All employees are required to:

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

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

OUR LEADERSHIP PROMISE

Our leaders are expected to:

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

Culture of Safety: Every Patient, Every Time

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



Reporting Compliance Issues

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

There are several ways to report concerns or suspected violations:



Compliance QR Code



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



Contact Your Supervisor

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

Contact Human Resources

Phone 760.740.6300

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

Contact the Compliance Office

Phone 442.281.3632

Email Compliance.Officer@PalomarHealth.org

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

Report Anonymously by Phone

Values Line 800.850.2551

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

Report Anonymously Online

Visit PalomarHealth.org/SpeakUp

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

Contact Privacy/Information Security

Privacy 760.480.7992 or L_PrivacyOffice@PalomarHealth.org

Information Security 760.291.6555 or InfoSec@PalomarHealth.org

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

Investigation and Resolution

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

If necessary, we take action to:

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

Non-Retaliation

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

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

CONFIDENTIALITY

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

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

Disciplinary Action

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

Just Culture

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

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

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

Good Faith Reporting

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

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



SERVICE

Serving others and our community

SERVICE BEHAVIOR STANDARDS

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

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

-A grateful Palomar Health patient



Safety, Health and the Environment

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

You are required to:

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



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

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

Workplace Conduct and Employment Practices

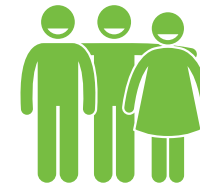
At Palomar Health, we embrace diversity.

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

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

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

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



Examples of such behavior are:

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

COMPASSION



Providing comfort and care

COMPASSION BEHAVIOR STANDARDS

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



Patient Rights

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

This means:

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

Admissions, Transfers and Continuity of Care

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

This means:

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

Did You Know?

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

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

Did You Know?

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



TRUST

Delivering on promises

TRUST BEHAVIOR STANDARDS

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

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

-A grateful Palomar Health patient



Quality of Care

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

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

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

Qualified Caregivers

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

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

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

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

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

Information Technology

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

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

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

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

Report Lost or Stolen Devices

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

Social Media

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

Confidentiality and Privacy

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

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

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

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

Did You Know?

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

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

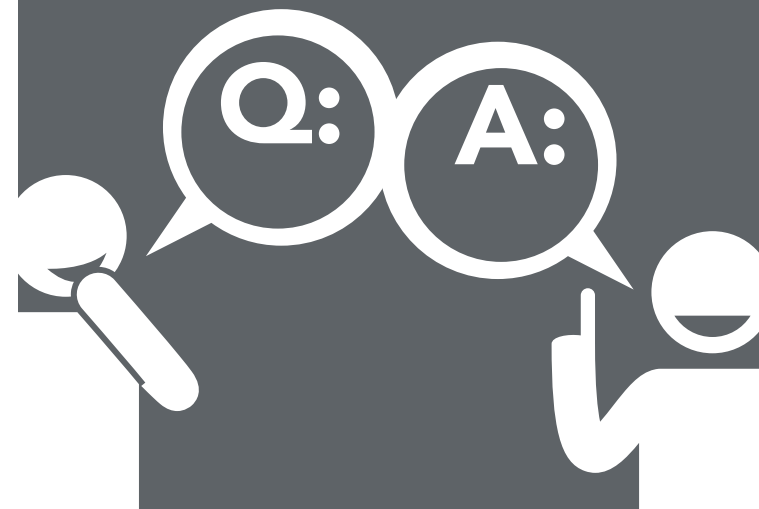
It is not appropriate to access a patient's record to:

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

Breach of Protected Health Information

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

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



INTEGRITY

Doing the right thing for the right reason

INTEGRITY BEHAVIOR STANDARDS

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

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

*-A grateful
Palomar Health patient*




Conflicts of Interest

At Palomar Health, we disclose potential conflicts of interest.

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

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



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

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

Examples of Potential Conflicts of Interest:

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

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

Gifts and Entertainment

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

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

Questions About a Gift?

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



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

Gifts from Grateful Patients

If a patient wishes to send a gift, encourage them to express their gratitude by donating to the Palomar Health Foundation, sending a letter to Administration.



Gift Giving

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



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

Items That Are Not Considered Gifts

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



Documentation, Retention and Disposal

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

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

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

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

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

Coding and Billing

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

This means:

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

Organizational Assets

At Palomar Health, we use organizational resources responsibly.

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

This means we are responsible for:

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

What is the False Claims Act?

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

Examples of possible violations of the FCA include:

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

Physician Relations

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

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

Customer and Business Associate Relations

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

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

Media Communications

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

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

Did You Know?

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

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



Code of Conduct Glossary of Terms

1. **Abuse** - Billing for unnecessary medical services, charging excessively for services/supplies, misusing codes on a claim (upcoding or unbundling codes).
2. **Allegation(s)** – A claim or assertion that someone has done something illegal or wrong, sometimes made with or without proof. It is what someone may think or believe.
3. **Anonymous** – Not identifying oneself in a claim or report made (no name or number).
4. **Compliance** – Meeting all of the rules and requirements applicable to the organization across an expansive set of criteria. Meeting or exceeding the legal, ethical and professional standards applicable to the organization including establishing a culture of compliance.
5. **Confidentiality** – The keeping of a person's or entity's information private.
6. **Conflict of Interest** – Situations in which financial/other personal considerations may compromise/appear to compromise one's ability to make objective decisions while performing their job duties. It applies to all employees, contractors and volunteers.
7. **Debarred** – An individual who is officially banned, barred or excluded from participating or doing something.
8. **Disclosure** – Making something known that was private before.
9. **Discrimination** – When someone treats an individual less favorably because of their ancestry, race (hair texture and styles), color, age (40 and above), religion, sex/gender (includes pregnancy, childbirth, breastfeeding and/or related medical conditions), sexual orientation, gender expression/identity, national origin, disability (physical, developmental, mental health/psychiatric, HIV and AIDS), genetic information, marital status, medical condition (genetic characteristics, cancer/a record or history of cancer), reproductive health decision-making or status as a protected veteran.
10. **Diversity** – Having differences in race, gender, economic status, culture, ages, education communication styles and values.
11. **EMTALA** – Stands for: Emergency Medical Treatment and Labor Act. It gives every patient that comes to an emergency room rights. The right to a medical screening, treatment until the emergency medical condition is stabilized and/or the right to an appropriate transfer.
12. **Ethics** – Palomar Health has a Code of Conduct which emphasizes standards that each employee needs to follow.
13. **Excluded** - An individual who is officially banned, barred or excluded from participating or doing something.
14. **Fiduciary** – A person or organization that makes financial decisions on behalf of others, or an organization, is legally and ethically bound to put the represented individual or organization's interests ahead of their own and has a duty to preserve good faith and trust.
15. **Fiscal** – Relating to finances, i.e. a fiscal year is a 12-month period.
16. **Fraud** – Knowingly submitting or causing to be submitted false claims, soliciting, receiving, offering or paying remuneration to induce or reward referrals for items/services reimbursed by federal healthcare programs, ordering medically unnecessary items/services for patients.
17. **Grievance** – Is an expression of dissatisfaction about employment; something in which an employee may feel is unjust, unfair or deviates from the company's policies.
18. **Harassment** – When an individual directs negative, inappropriate or unwanted conduct towards another worker based on certain protected characteristics.
19. **HIPAA** – Health Insurance and Portability and Accountability Act – this act protects patient health information and holds covered entities and their business associates responsible for ensuring that health information is protected.
20. **Minimum Necessary** – This is an aspect of HIPAA and requires that covered entities educate staff on only utilizing the minimum information necessary and that only those individuals involved in the care of an individual should have access to that information.
21. **Proprietary** – Palomar Health owns, possesses or holds the exclusive right to its facilities, documents, brand, properties, etc.
22. **Retaliation** – Is when an employer fires or takes any adverse action against an employee for engaging in protected activity. Examples below:
 - Someone's hours are reduced because they exercised their right to FMLA.
 - Someone is sent home for attempting to exercise their FLSA rights.
23. **Solicit** – Asking for or trying to obtain something from someone.
24. **Unauthorized** – Means you do not have permission or authority.
25. **Waste** – Overusing services or other practices that directly or indirectly result in unnecessary costs to any healthcare benefit program.

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

*Have
Questions?*

**CALL THE
VALUES LINE:**

800.850.2551

REPORT ONLINE:

PalomarHealth.org/SpeakUp

Speak Up!



*Scan to report
concerns or
issues!*

CERTIFICATION

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

Board of Director Approved 3.13.2023