



# **2025 Code of Conduct**

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CalOptima Health Chief Compliance Officer

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## **Message from Chief Compliance Officer (CCO)**

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CalOptima Health is committed to its mission “to serve member health with excellence and dignity, respecting the value and needs of each person.” Foundational to fulfilling this commitment is conducting ourselves in an ethical and compliant manner in the course of our daily activities and interactions. CalOptima Health expects all employees, contractors, officers, board members, network providers, subcontractors and downstream contractors act ethically and have a responsibility in ensuring compliance.

This document is a guide with 11 principles and related standards to provide a framework for CalOptima Health’s Code of Conduct and how we are to conduct ourselves in serving our members. Please review this Code of Conduct and reach out to the Chief Compliance Officer or a representative from the Office of Compliance if you have any questions regarding this information.

It is incumbent upon all Board members, employees, providers and contractors to report any potential issues of non-compliance or misconduct. Reporting can be done online via the InfoNet or the CalOptima Health website, email, or phone.

You also have the option to anonymously report issues to the:

**Compliance and Ethics Hotline at 1-855-507-1805**

If you are unsure of a particular matter or situation, talk to your supervisor or a representative from the Office of Compliance to discuss your concerns and get guidance. Conducting our business compliantly and ethically is key to sustaining our business and maintaining our focus in serving our members.

Thank you for your dedication to serving our members and to following this Code of Conduct.

## Code of Conduct 11 Principles

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**1. Mission, Vision, and Values:**

CalOptima Health is committed to its Mission, Vision, and Values

**2. Member Rights:**

CalOptima Health is committed to meeting the health care needs of its members by providing access to quality health care services.

**3. Compliance with the Law and Applicable Program Requirements:**

CalOptima Health is committed to conducting all activities and operations in compliance with all applicable requirements and standards under its contract with DHCS and all and federal and state requirements including CMS requirements.

**4. Business Ethics:**

In furtherance of CalOptima Health's commitment to the highest standards of business ethics, employees and contractors shall accurately and honestly represent CalOptima Health and shall not engage in any activity or scheme intended to defraud anyone of money, property, or honest services.

**5. Conflicts of Interests:**

Board members, employees, and contractors owe a duty of undivided and unqualified loyalty to CalOptima Health.

**6. Public Integrity:**

CalOptima Health and its Board members, employees, and contractors shall comply with laws and regulations governing public agencies.

**7. Confidentiality:**

Board members, employees, and contractors shall maintain the confidentiality of all confidential information in accordance with applicable law and shall not disclose such confidential information except as specifically authorized by CalOptima Health policies, procedures, and applicable laws.

**8. Compliance Program Reporting:**

Board members, employees, and contractors have a duty to comply with CalOptima Health's Compliance Program and such duty shall be a condition of their respective appointment, employment, or engagement.

**9. Discrimination:**

CalOptima Health acknowledges that fair and equitable treatment of employees, contractors, members, providers, and other persons is fundamental to fulfilling its mission and goals.

**10. Participation Status:**

CalOptima Health requires that employees, contractors, providers, and suppliers meet Government requirements for participation in CalOptima Health's programs.

**11. Government Inquiries/Legal Disputes:**

Employees and contractors shall notify CalOptima Health upon receipt of Government inquiries and shall not destroy or alter documents in response to a government request for documents or information.

# Code of Conduct Principles and Standards

Principle	Standard
<p><b>1. Mission, Vision, and Values</b>            CalOptima Health is committed to its Mission, Vision, and Values</p>	<p><b>Mission</b>            To serve member health with excellence and dignity, respecting the value and needs of each person.</p> <p><b>Vision by 2027</b></p> <ul style="list-style-type: none"> <li>• CalOptima Health Same-Day Treatment Authorizations</li> <li>• Real-Time Claims Payments</li> <li>• Annual Assessments of Member’s Social Determinants of Health.</li> </ul> <p><b>Values = CalOptima Health CARES</b>            Collaboration; Accountability; Respect; Excellence; Stewardship</p>
<p><b>2. Member Rights</b>            CalOptima Health is committed to meeting the health care needs of its members by providing access to quality health care services.</p>	<p><b>Member Choice, Access to Health Care Services, Continuity of Care</b>            Employees and contractors shall comply with CalOptima Health policies and procedures and applicable law governing member choice, access to health care services, and continuity of member care. Employees and contractors shall comply with all requirements for coordination of medical and support services for persons with special needs.</p> <p><b>Health Equity</b>            Employees and contractors shall endeavor to address and prioritize health equity in the design and implementation of CalOptima Health strategies and programs.</p> <p><b>Cultural and Linguistic Services</b>            CalOptima Health and contractors shall provide culturally, linguistically, and sensory appropriate services to CalOptima Health members to ensure effective communication regarding diagnosis, medical history, and treatment, and health education.</p> <p><b>Disabled Member Access</b>            CalOptima Health’s facilities shall adhere to the requirements of Title III of the Americans with Disabilities Act of 1990 by providing access for disabled members.</p> <p><b>Emergency Treatment</b>            Employees and contractors shall comply with all applicable guidelines, policies and procedures, and laws governing CalOptima Health member access and payment of emergency services including, without limitation, the Emergency Medical Treatment and Active Labor Act (“EMTALA”) and</p>

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	<p>state patient “anti-dumping” laws, prior authorization limitations, and payment standards.</p> <p><b>Grievance and Appeals Processes</b>            CalOptima Health, its physician groups, its Health Networks, and third-party administrators (TPA) shall ensure that CalOptima Health members are informed of their grievance and appeal rights including, the state hearing process, through member handbooks and other communications in accordance with CalOptima Health policies and procedures and applicable laws. Employees and contractors shall address, investigate, and resolve CalOptima Health member complaints and grievances in a prompt and nondiscriminatory manner in accordance with CalOptima Health policies and applicable laws.</p>
<p><b>3. Compliance with the Law and Applicable Program Requirements</b>            CalOptima Health is committed to conducting all activities and operations in compliance with applicable law and program requirements.</p>	<p><b>Transparent, Legal, and Ethical Business Conduct</b>            CalOptima Health is committed to conducting its business with integrity, honesty, and fairness and in compliance with all federal and state laws and regulations, and applicable requirements and standards under its Contract with DHCS. CalOptima Health expects all employees, contractors, officers, board of directors members, network providers, subcontractors, and downstream contractors to act ethically and are responsible for ensuring CalOptima Health compliance.</p> <p><b>Obeying the Law</b>            Board members, employees, and contractors (including First Tier and Downstream Entities included in the term “FDRs”) shall not lie, steal, cheat, or violate any law in connection with their employment and/or engagement with CalOptima Health.</p> <p><b>Fraud, Waste, &amp; Abuse (FWA)</b>            CalOptima Health shall refrain from conduct which would violate the Fraud, Waste, and Abuse laws. CalOptima Health is committed to the detection, prevention, and reporting of Fraud, Waste, and Abuse. CalOptima Health is also responsible for ensuring that Board members, employees, contractors, and FDRs receive appropriate FWA training as described in regulatory guidance. CalOptima Health’s Compliance Plan, Anti-Fraud, Waste, and Abuse Plan and policies describe examples of Potential Fraud, Waste, and Abuse and discuss employee and contractor FWA obligations and potential Sanctions arising from relevant federal and state FWA laws. CalOptima Health expects and requires that its Board members, employees, and contractors do not participate in any conduct that may violate the FWA laws including federal and state anti-kickback laws, false claims acts, and civil monetary penalty laws.</p>

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	<p><b>Political Activities</b>  CalOptima Health’s political participation is limited by law. CalOptima Health funds, property, and resources are not to be used to contribute to political campaigns, political parties, and/or organizations. Board members, employees and contractors may participate in the political process on their own time and at their own expense but shall not give the impression that they are speaking on behalf of or representing CalOptima Health in these activities.</p> <p><b>Anti-Trust</b>  All Board members, employees, and contractors must comply with applicable antitrust, unfair competition, and similar laws which regulate competition. Such persons shall seek advice from legal counsel if they encounter any business decisions involving a risk of violation of antitrust laws. The types of activities that potentially implicate antitrust laws include, without limitation, agreements to fix prices, bid rigging, and related activities; boycotts, certain exclusive dealings, and price discrimination agreements; unfair trade practices; sales or purchases conditioned on reciprocal purchases or sales; and discussion of factors determinative of prices at trade association meetings.</p>
<p><b>4. Business Ethics</b>  In furtherance of CalOptima Health’s commitment to the highest standards of business ethics, employees and contractors shall accurately and honestly represent CalOptima Health and shall not engage in any activity or scheme intended to defraud anyone of money, property, or honest services.</p>	<p><b>Candor &amp; Honesty</b>  CalOptima Health requires candor and honesty from individuals in the performance of their responsibilities and in communications including, communications with CalOptima Health’s Board of Directors, supervisory employees, attorneys, and auditors. No Board member, employee, or contractor shall make false or misleading statements to any members and/or persons, or entities, doing business with CalOptima Health about products or services of CalOptima Health.</p> <p><b>Financial and Data Reporting</b>  All financial reports, accounting records, research reports, expense accounts, data submissions, attestations, timesheets, and other documents must accurately and clearly represent the relevant facts and the true nature of a transaction. CalOptima Health maintains a system of internal controls to ensure that all transactions are executed in accordance with Management’s authorization and recorded in a proper manner to maintain accountability of the agency’s assets. Improper or fraudulent accounting documentation or financial reporting or false or misleading encounter, claims, cost, or other required regulatory data submissions is contrary to the</p>

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	<p>policy of CalOptima Health and may be in violation of applicable laws and regulatory obligations.</p> <p><b>Regulatory Agencies and Accrediting Bodies</b>  CalOptima Health will deal with all Regulatory Agencies and accrediting bodies in a direct, open, and honest manner. Employees and contractors shall not take action with Regulatory Agencies and accrediting bodies that is false or misleading.</p>



## **5. Conflicts of Interests**

Board members, employees, and contractors owe a duty of undivided and unqualified loyalty to CalOptima Health.

### **Conflicts of Interest**

Designated employees and contractors shall comply with the requirements of GA.8012: Conflicts of Interest (policy), and applicable laws. Board members, employees, and contractors are expected to conduct their activities to avoid impropriety and/or the appearance of impropriety, which might arise from the influence of those activities on business decisions of CalOptima Health, or from disclosure of CalOptima Health's business operations.

In addition to these provisions, designated employees are also subject to the provisions of the Conflict of Interest Code adopted by the CalOptima Health Board of Directors in compliance with the California Government Code. Designated employees must complete a Form 700 Statement of Economic Interests and a CalOptima Health Supplement to Form 700 upon hire, annually, and upon separation of employment. The HR department coordinates this activity with the CalOptima Health Clerk of the Board.

CalOptima Health Policy GA.8012: Conflicts of Interest describes in detail prohibited conflicts of interest relative to your employment with CalOptima Health. One aspect of particular interest are conflicts related to family members. As noted in CalOptima Health Policy GA.8012: Conflicts of Interest:

- If an employee or an employee's immediate family member, as defined in the Political Reform Act, has a financial or employment relationship with a current or potential provider, supplier, vendor, consultant or member, the employee must disclose this fact in writing to HR.
  - For example, if CalOptima Health is considering contracting with a vendor for which your brother is an employee, you must disclose this in writing to HR.
- CalOptima Health Employees shall not handle member or provider issues, applications, requests, or cases on behalf of CalOptima Health for member(s) of the employee's own family or for personal friends.

For further specific information on Conflicts of Interest; Gifts, Honoraria, and Travel Payments; and Solicitation and Receipts of Gifts see CalOptima Health Policies GA.8012: Conflicts of Interest, AA.1204: Gifts, Honoraria, and Travel Payments, and AA.1216: Solicitation and Receipt of Gifts to CalOptima Health. If you have any questions regarding these policies, you may reach out to the Chief Human Resources Officer or the Chief Compliance Officer.

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<p><b>6. Public Integrity</b>            CalOptima Health and its Board members, employees, and contractors shall comply with laws and regulations governing public agencies.</p>	<p><b>Public Records</b>            CalOptima Health shall provide access to CalOptima Health Public Records to any person, corporation, partnership, firm, or association requesting to inspect and copy them in accordance with the California Public Records Act, California Government Code Sections 6250 et seq. and CalOptima Health policies.</p> <p><b>Public Funds</b>            CalOptima Health, its Board members, employees, and contractors shall not make gifts of public funds or assets or lend credit to private persons without adequate consideration unless such actions clearly serve a public purpose within the authority of the agency and are otherwise approved by legal counsel. CalOptima Health, its Board members, employees, and contractors shall comply with applicable law and CalOptima Health policies governing the investment of public funds and expenditure limitations.</p> <p><b>Public Meetings</b>            CalOptima Health, its Board members, employees, and contractors shall comply with requirements relating to the notice and operation of public meetings in accordance with the Ralph M. Brown Act, California Government Code Sections 54950 et seq.</p>
<p><b>7. Confidentiality</b>            Board members, employees, and contractors shall maintain the confidentiality of all confidential information in accordance with applicable law and shall not disclose such confidential information except as specifically authorized by CalOptima Health policies, procedures, and applicable laws.</p>	<p><b>No Personal Benefit</b>            Board members, employees and contractors shall not use confidential or proprietary CalOptima Health information for their own personal benefit or for the benefit of any other person or entity, while employed at, or engaged by, CalOptima Health, or at any time thereafter.</p> <p><b>Duty to Safeguard Member Confidential Information</b>            CalOptima Health recognizes the importance of its members’ right to confidentiality and implements policies and procedures to ensure its members’ confidentiality rights and the protection of medical and other confidential information. Board members, employees and contractors shall safeguard CalOptima Health member identity, eligibility, social security, medical information and other confidential information in accordance with applicable laws including the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH Act) and implementing regulations, the California Security Breach Notification Law, the California Confidentiality of Medical Information Act, other applicable federal and state privacy laws, and CalOptima Health’s policies and procedures.</p>

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	<p><b>Personnel Files</b> Personal information contained in employee personnel files shall be maintained in a manner designed to ensure confidentiality in accordance with applicable laws.</p> <p><b>Proprietary Information</b> Subject to its obligations under the Public Records Act, CalOptima Health shall safeguard confidential proprietary information including, without limitation, contractor information and proprietary computer software, in accordance with and, to the extent required by contract or law. CalOptima Health shall safeguard provider identification numbers including, without limitation, Medi-Cal license, Medicare numbers, social security numbers, and other identifying numbers.</p>
<p><b>8. Compliance Program Reporting</b> Board members, employees, and contractors have a duty to comply with CalOptima Health's Compliance Program and such duty shall be a condition of their respective appointment, employment, or engagement.</p>	<p><b>Reporting Requirements</b> In alignment with CalOptima Health's reporting policies, all Board members, employees and contractors are expected and required to promptly report suspected violations of any statute, regulation, or guideline applicable to Federal and/or State health care programs or of CalOptima Health's policies and Compliance Plan.. Such reports may be made to a Supervisor, the Chief Compliance Officer or may also be made to CalOptima Health's Compliance and Ethics Hotline number below. Persons making reports to the hotline can do so on an anonymous basis.</p> <p style="text-align: center;"><b>Compliance and Ethics Hotline: 1-855-507-1805</b></p> <p><b>Disciplinary Action</b> Failure to comply with the Compliance Program, including the Code of Conduct, policies, and/or applicable statutes, regulations and guidelines may lead to disciplinary action. Discipline for failure to abide by the Code of Conduct may, in CalOptima Health's discretion, range from oral correction to termination in accordance with CalOptima Health's policies. In addition, failure to comply may result in the imposition of civil, criminal, or administrative fines on the individual, or entity, and CalOptima Health or Exclusion or Preclusion from participation in Federal and/or State health care programs.</p> <p><b>Training and Education</b> CalOptima Health provides training and education to Board members, employees, contractors, and FDRs. Timely completion of compliance and</p>

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	<p>HIPAA training is mandatory for all CalOptima Health employees and contractors.</p> <p><b>Non-Retaliation Policy</b> CalOptima Health prohibits retaliation against any individual who reports discrimination, harassment, or compliance concerns, or participates in an investigation of such reports, in good faith. Employees and contractors involved in any retaliatory acts may be subject to discipline, up to and including termination of employment.</p> <p><b>Referrals of FWA to Government Agencies</b> CalOptima Health is obligated to coordinate compliance activities with federal and state regulators. Employees and contractors shall comply with CalOptima Health policies related to FWA referral requirements to federal and state regulators, delegated program integrity contractors, and law enforcement agencies.</p> <p><b>Certification</b> All Board members, employees, and contractors are required to certify, in writing, that they have received, read, understand, and will abide by the Code of Conduct and applicable policies.</p>
<p><b>9. Discrimination</b> CalOptima Health acknowledges that fair and equitable treatment of employees, contractors, members, providers, and other persons is fundamental to fulfilling its mission and goals.</p>	<p><b>No Discrimination</b> CalOptima Health is committed to compliance with applicable anti-discrimination laws including Title VI of the Civil Right Act of 1964. Board members, employees and contractors shall not unlawfully discriminate on the basis of race, color, national origin, creed, ancestry, religion, language, age, marital status, gender (which includes sex, gender identity, gender transition status and gender expression), sexual orientation, health status, pregnancy, physical or mental disability, military status or any other classification protected by law. CalOptima Health is committed to providing a work environment free from discrimination and harassment based on any classification noted above.</p> <p><b>Reassignment</b> CalOptima Health, physician groups, and Health Networks shall not reassign members in a discriminatory manner, including based on the enrollee’s health status.</p>
<p><b>10. Participation Status</b> CalOptima Health requires that employees,</p>	<p><b>Federal and State Health Care Program Participation Status</b> Board members, employees, and contractors shall not be currently suspended, terminated, debarred, or otherwise ineligible to participate in any</p>

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<p>contractors, providers, and suppliers meet Government requirements for participation in CalOptima Health's programs.</p>	<p>Federal or State health care program, including the Medi-Cal program and Medicare programs.</p> <p><b>CalOptima Health Screening</b> CalOptima Health will Monitor the participation status of employees, individuals and entities doing business with CalOptima Health by conducting regular Exclusion and Preclusion screening reviews in accordance with CalOptima Health policies.</p> <p><b>Disclosure of Participation Status</b> Board members, employees and contractors shall disclose to CalOptima Health whether they are currently suspended, terminated, debarred, or otherwise ineligible to participate in any Federal and/or State health care program. Employees, individuals, and entities that do business with CalOptima Health shall disclose to CalOptima Health any pending investigation, disciplinary action, or other matter that could potentially result in their exclusion or preclusion from participation in any Federal or State health care program.</p> <p><b>Delegated Third Party Administrator Review</b> CalOptima Health requires that its Health Networks, physician groups, and third-party administrators review participating providers and suppliers for licensure and participation status as part of the delegated credentialing and recredentialing processes when such obligations have been delegated to them.</p> <p><b>Licensure</b> CalOptima Health requires that all employees, contractors, Health Networks, participating providers, and suppliers who are required to be licensed, credentialed, certified, and/or registered in order to furnish items or services to CalOptima Health and its members have valid and current licensure, credentials, certification and/or registration, as applicable.</p>
<p><b>11. Government Inquiries/Legal Disputes</b> Employees and contractors shall notify CalOptima Health upon receipt of government inquiries and shall not destroy or alter</p>	<p><b>Notification of Government Inquiry</b> Employees and contractors shall notify the Chief Compliance Officer and/or their supervisor immediately upon the receipt (at work or at home) of an inquiry, subpoena, or other agency or government requests for information regarding CalOptima Health.</p> <p><b>No Destruction of Documents</b> Employees and contractors shall not destroy or alter CalOptima Health information or documents in anticipation of, or in response to, a request for</p>

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<p>documents in response to a government request for documents or information.</p>	<p>documents by any governmental agency or from a court of competent jurisdiction.</p> <p><b>Preservation of Documents Including Electronically Stored Information</b>  Board members, employees, and contractors shall comply with all obligations to preserve documents, data, and records including, electronically stored information in accordance with CalOptima Health policies and shall comply with instructions on preservation of information and prohibitions and destruction of information issued by legal counsel.</p>