

## SECTION 9

### VENDOR INTEGRITY PROGRAM

#### 9.0 PRINCIPLES OF RESPONSIBILITY – KAISER PERMANENTE’S VENDOR CODE OF CONDUCT

Kaiser Permanente has established a compliance program for contracted providers. A component of our compliance program dictates that all contracted providers and employees working directly or indirectly with Kaiser Permanente receive a copy of our Vendor Code of Conduct and Principles of Responsibility. If you have not received your copy, please call the National Provider Contracting and Network Management department. The telephone number is listed in the “Key Contacts” section of this Provider Manual. It is expected that all business activities and transactions adhere to the Principles of Responsibility during the contract period.

Principles of Responsibility include, but are not limited to the following:

- **Non-Discrimination:** Kaiser Permanente requires all providers serving our members be compliant with all laws which prohibit discrimination because of race, religion, sex/gender, sexual orientation, national origin, age, physical or mental disability, veteran status, or any other status protected by law
- **Harassment:** Any kind of harassment is prohibited by contracted providers
- **Personal Opportunities, Benefit or Gain:** Our Vendor Integrity Program requires that all contracted providers/vendors not exploit Kaiser Permanente information, services and resources for personal benefit or gain
- **Clinical Data, Reports and Outcomes:** Kaiser Permanente requires documentation of clinical and service events in a clear and precise manner. Facilitation and accurate interpretation of clinical information for business operations such as diagnostic and service coding, billing, cost reporting, planning and research are also required.

For a complete description of our Principles of Responsibility please refer to your Vendor Code of Contact and Principles of Responsibility.

#### 9.1 KAISER PERMANENTE NATIONAL COMPLIANCE AND ETHICS HOTLINE

Kaiser Permanente has established a toll-free number to report compliance and ethics concerns 24 hours a day, 7 days a week. It is a convenient and anonymous way for a provider to report known or suspected compliance violations as required by the Vendor Integrity Program. A provider can use the Kaiser Permanente Compliance and Ethics Hotline and remain anonymous without fear of retaliation. All calls are never recorded or traced.



Kaiser Permanente has contracted with an independent company to take a provider's detailed report. They will assign a case number to the report. The information provided is sent to the National Compliance, Ethics, and Integrity Office to review concerns and oversee the investigation to ensure compliance and ethics issues are addressed and corrected appropriately. A provider can call back to find out the status of the case and the outcome once the investigation is concluded.

Examples of reasons a provider might call the Kaiser Permanente Compliance and Ethics Hotline are:

- Violations of member confidentiality Discrimination
- Harassment
- Falsified clinical or financial records
- Anti-trust discussions
- Doubts or concerns regarding business activities

**Kaiser Permanente National Compliance and Ethic Hotline  
1-888-744-9100**

**Compliance and Vendor Integrity Links:**

[Code of Conduct](#)

[Vendor integrity program](#)

[Compliance and ethics hotline](#)