



**Gold Coast  
Health Plan<sup>SM</sup>**  
A Public Entity

# Code of Conduct



**Compassionate care, accessible to all,  
for a healthy community**

# Code of Conduct

## Why Our Code of Conduct Matters



At Gold Coast Health Plan (GCHP), our Code of Conduct is more than a set of rules; it's a reflection of who we are and how we choose to show up for each other, our members, and our community. It's grounded in our mission to improve the health of our members through high-quality care and services, and it supports our vision of compassionate care, accessible to all.

We hold ourselves to these expectations not just because they're required, but because they reflect the kind of culture we're building together – a culture rooted in integrity, accountability, collaboration, trust, and respect. These values guide our decisions, shape our relationships, and define how we work as a team.

By living these values every day, we create a workplace where people feel safe, supported, and empowered to do their best work. Our Code of Conduct helps us stay aligned, act ethically, and navigate challenges with clarity and confidence.

Who is accountable to our Code of Conduct? GCHP employees, Commissioners, network providers, and contractors (including subcontractors and downstream subcontractors). These individuals are expected to be familiar with this Code of Conduct and adhere to it at all times.

If you have any questions, please reach out to the Compliance Department at [Compliance@goldchp.org](mailto:Compliance@goldchp.org).

Sincerely,



Felix L. Nuñez, MD  
Chief Executive Officer

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## Our Mission and Vision

### **Our Mission:**

To improve the health of our members through the provision of high-quality care and services.

### **Our Vision:**

Compassionate care, accessible to all, for the health of our community.

### **Our Core Values:**

These five values shape how we work, how we treat each other, and how we serve our community:

## GOLD COAST HEALTH PLAN **Core Values**

### ➤ **Integrity**

Achieving the highest quality standards of professional and ethical behavior, with transparency in all business and community interactions.

### ➤ **Accountability**

Taking responsibility for our actions and being good stewards of our resources.

### ➤ **Collaboration**

Working together to empower our GCHP community to achieve our shared goals.

### ➤ **Trust**

Building relationships through honest communication and by following through on our commitments.

### ➤ **Respect**

Embracing diversity and treating people with compassion and dignity.

## Accountability in Action

At GCHP, accountability isn't just a concept; it's something we practice every day. We use the 16 Accountability Best Practices to guide how we work, make decisions, and support one another. These practices help us stay focused, take ownership, and contribute to a culture where people feel responsible and empowered.

Here's how we break it down:



### **See it**

- Understand different perspectives
- Communicate openly and honestly
- Ask for and offer feedback
- Speak up and listen to what's really going on



### **Own it**

- Stay personally invested
- Learn from successes and failures
- Make sure your work supports key results
- Act on the feedback you receive



### **Solve it**

- Ask, "What else can I do?"
- Work across teams and roles
- Tackle challenges with creativity
- Take smart risks when needed



### **Do it**

- Follow through on commitments
- Avoid blame and focus on solutions
- Track progress and report transparently
- Build trust through consistent action

These practices help us stay aligned with our purpose and deliver results that matter, for our members, our teams, and our community.

# Our Culture



## Our Culture Equation

<b>PURPOSE</b>	Compassionate care, accessible to all, for the health of OUR community		
<b>RESULTS 2 (R2)</b>	NCQA 4-Star Health Plan Rating by 2030		
<b>STRATEGIC ANCHORS</b>	Enhance Member Experience	Optimize Provider Relationships / Partnerships	Advance Quality of Care
<b>KEY RESULTS</b>	CAHPS score of top 3 for both children and adults	Provider satisfaction survey score of 66%	Top 3 in the state DHCS ranking
<b>CULTURAL BELIEFS</b>	<b>Member Impact!</b>	<b>Own It!</b>	<b>Be Resourceful!</b>
	<i>I organize my work to achieve our priorities.</i>	<i>I make decisions, take action, and own the outcome.</i>	<i>I creatively solve challenges, work cross-functionally, and optimize resources.</i>

CAHPS: Consumer Assessment of Healthcare Providers & Systems / DHCS: Department of Health Care Services / NCQA: National Committee for Quality Assurance

Culture is the way we think and act to get results. It's not just about what we do; it's about how we do it.

We use our **Culture Equation** to connect our purpose, strategy, and culture:

- Purpose is why we do what we do.
- Strategy is how we do it.
- Culture is the way we work together to make it happen.

This equation helps us stay focused and aligned, and it's how we deliver results that matter.

## Our Cultural Beliefs

Our culture is shaped by what we believe and how we behave. These beliefs guide our daily actions and help us stay focused on what matters most:

Living our values and practicing accountability helps us build a strong, ethical culture. It also means staying committed to doing our work the right way. That includes following the laws and regulations that apply to our work.

# CULTURAL BELIEFS

### Member Impact!

*I organize my work to  
achieve our priorities.*

### Own It!

*I make decisions, take action,  
and own the outcome.*

### Be Resourceful!

*I creatively solve challenges,  
work cross-functionally,  
and optimize resources.*



GUIDING OUR CULTURE TO ELEVATE OUR IMPACT

## Compliance with the Law



*GCHP is committed to conducting all activities and operations in compliance with applicable federal and state law. Additionally, GCHP is committed to complying with all applicable requirements and standards under its contracts with the state Department of Health Care Services (DHCS) and Centers for Medicare & Medicaid Services (CMS) Medicare Managed Care Manual Chapter 21, and Chapter 9 of the Prescription Drug Benefit Manual. All GCHP employees, officers, Commissioners, network providers, and contractors (including subcontractors, downstream contractors, and first-tier downstream related entities) are required to act ethically and have a responsibility to ensure compliance.*

### Obeying the Law

Commissioners, workforce members, employees, staff and contractors shall not lie, steal, cheat or violate any law in connection with their employment and/or engagement with GCHP.

### Anti-Trust

All Commissioners, workforce members, employees, staff, 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 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.

## Fraud, Waste and Abuse

GCHP shall refrain from conduct that would violate fraud, waste and abuse laws. GCHP is committed to the detection, prevention, and reporting of fraud, waste and abuse. GCHP expects and requires that its Commissioners, workforce members, employees, staff, and contractors do not participate in any conduct that may violate fraud, waste and abuse laws. Generally, these laws prohibit direct or indirect payments (whether in cash or in kind) in exchange for the referral of patients or services, which are paid by federal and/or state health care programs, including Medi-Cal and Medicare; schemes to defraud any health care benefit program or to obtain (by means of false or fraudulent pretenses representations, or promises) any of the money or property owned by, or under the custody or control of, any health care benefit program; and overutilization of services or other practices that, directly or indirectly, result in unnecessary costs to the health care system.

## Political Activities

GCHP's political participation is limited by law. GCHP funds, property, and resources are not to be used to contribute to political campaigns, political parties, and/or political organizations. Commissioners, workforce members, employees, staff, 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 GCHP in these activities.

## Public Funds

GCHP, its Commissioners, employees, workforce members, and staff shall not make gifts of public funds or assets or lend credit to private persons without adequate consideration unless such actions serve a public purpose within the authority of the agency. GCHP, its Commissioners, employees, workforce members, and staff shall comply with applicable law and GCHP policies governing the investment of public funds and expenditure limitations.

## Public Integrity

GCHP and its Commissioners, employees, workforce members, and staff shall comply with laws and regulations governing public agencies.

## Public Meetings

GCHP and its Commissioners, employees, workforce members, and staff 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.

## Public Records

GCHP shall provide access to GCHP public records to any person, corporation, partnership, firm or association requesting to inspect and copy them in compliance with the California Public Records Act, California Government Code Sections 6250 et seq., Freedom of Information Act, and GCHP policies, unless specifically exempted or otherwise confidential.

## Third-Party Sponsored Events

GCHP's joint participation in contractor, vendor or other third-party sponsored events, educational programs and workshops is subject to compliance with applicable law, including gifts of public fund requirements; fair political practices laws and regulations; and fraud, waste and abuse prohibitions, and must be approved in accordance with GCHP policies on this subject. In no event shall GCHP participate in any joint contractor, vendor, or third-party sponsored event where the intent of the other participant is to improperly influence, or gain unfair advantage from, GCHP or its operations. Employee, workforce member, and staff attendance at contractor, vendor or other third-party sponsored events, educational programs and workshops is generally permitted.

GCHP intends that these standards be construed broadly to avoid even the appearance of improper activity.

## Member and Community Engagement



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

### Access

Employees, workforce members, staff and contractors shall comply with GCHP policies and procedures and applicable law governing member choice and access to health care services. Employees, workforce members, staff and contractors shall comply with all requirements for coordination of medical and support services for persons with special needs. Employees, workforce members, staff and contractors shall provide culturally, linguistically and sensory appropriate services to GCHP members to ensure effective communication regarding diagnosis, medical history and treatment, and health education.

### Complaints and Grievances and Appeals Processes

GCHP, its physician groups, medical groups and third-party administrators shall ensure that GCHP members are informed of their grievance and appeal rights through member handbooks and other communications in accordance with GCHP policies and procedures and applicable law. Employees, workforce members, staff

and contractors shall address, investigate, and resolve GCHP member grievances and appeals in a prompt and nondiscriminatory manner in accordance with GCHP policies and applicable law.

Member grievances and appeals fall under these categories: Medi-Cal, Medicare / Dual Eligible Special Needs Plan (D-SNP), and Medicare market misrepresentation.

## Emergency Treatment

Employees, workforce members, staff and contractors shall comply with all applicable guidelines, policies and procedures and law governing GCHP member access and payment of emergency services, including, without limitation, the Emergency Medical Treatment and Active Labor Act (EMTALA) and state patient anti-dumping laws, prior authorization limitations, and payment standards.

## Ethics



*Ethics encompasses the principles, standards, and values that govern GCHP's conduct and decisions.*

### Candor and Honesty

GCHP requires candor and honesty from individuals in the performance of their responsibilities and in communications with GCHP's supervisors, attorneys, and auditors. No Commission member, employee, workforce member, staff member or contractor shall make false or misleading statements to any members and/or persons or entities doing business with GCHP or about products or services of GCHP.

### Business Ethics, including Fair Political Practice Laws and Regulations

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

## Business Inducements

Commissioners, employees, workforce members, staff, contractors, and GCHP providers shall not seek to gain advantage through improper use of payments, business courtesies, or other inducements. The offering, giving, soliciting, or receiving of any form of bribe or other improper payment is prohibited. Commissioners, employees, workforce members, staff, contractors and providers shall not use their positions to personally profit or assist others in profiting in any way at the expense of federal and/or state health care programs, GCHP, or GCHP members.

## Business Relationships

Business transactions with vendors, contractors, and other third parties shall be conducted at arm's length in fact and in appearance, transacted free from improper inducements, and in accordance with applicable law and ethical standards.

## Ethics Training

All Commissioners, committee members, employees, workforce members, and staff shall receive at least two hours of ethics training every two years or as otherwise required by the Ethics Training Policy. Each new Commissioner, committee member, employee, workforce member, and staff member who has not completed AB 1234 training for the two-year cycle ending on December 31 of the year immediately preceding assuming office shall complete the training in accordance with the Ethics Training Policy.

## Financial Reporting

All financial reports, accounting records, research reports, expense accounts, timesheets and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction. GCHP 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 is contrary to the policy of GCHP and may be in violation of applicable law. Commissioners and some designated employees, workforce members, and staff, as a result of their positions, are required to file annual financial statements and must report gifts as required by the Fair Political Practice laws and regulations.

## Gifts to GCHP

Commissioners, employees, workforce members, and staff are specifically prohibited from soliciting and accepting personal gratuities, gifts, favors, services, entertainment or any other things of value from any person or entity that furnishes items or services used, or that may be used, in GCHP and its programs unless specifically permitted under GCHP policies and Fair Political Practice laws and regulations. Commissioners, employees, workforce members, and staff may not accept cash or cash equivalents. Perishable or consumable gifts given to a department or group are not subject to any specific limitation, and meals served at business meetings are not considered a prohibited business courtesy.

## Protection and Personal Use of Agency Assets

Commissioners, employees, workforce members, staff, and contractors shall strive to preserve and protect GCHP's assets by making prudent and effective use of GCHP's resources and properly and accurately reporting their financial condition.

No Commissioners, employees, workforce members, staff, or contractors shall convert assets of GCHP to personal use. All property and business of GCHP shall be conducted in the manner designed to further GCHP's interest rather than a personal interest of an individual. Commissioners, employees, workforce members, staff, and contractors are prohibited from the unauthorized use or taking of GCHP's equipment, supplies, materials or services. Employees, workforce members, and staff shall obtain the prior approval of the appropriate manager of GCHP prior to engaging in any activity on GCHP time that will result in remuneration to the employee, workforce member, or staff from a party other than GCHP.

## Regulatory Agencies and Accrediting Bodies

GCHP will deal with all regulatory agencies and accrediting bodies in a direct, open and honest manner. Employees, workforce members, staff and contractors shall not take action that is false or misleading with regulatory agencies and accrediting bodies.

## Conflicts of Interest



*Conflicts of interest arise when the professional responsibilities of individuals or organizations are, or have the potential to be, compromised by other, external obligations. Commissioners, employees, workforce members, and staff owe a duty of undivided and unqualified loyalty to GCHP.*

### Conflict of Interest Code and Applicable Federal Regulations and Laws

Commissioners and designated employees, workforce members, and staff shall comply with the requirements of the GCHP Conflict of Interest Code. Commissioners, employees, workforce members, and staff are expected to conduct their activities to avoid impropriety and/or the appearance of impropriety that might arise from the influence of those activities on business decisions of GCHP, or from disclosure of GCHP's business operations.

## Outside Services and Interests

Without the prior written approval of the Chief Executive Officer (or in the case of the Chief Executive Officer, the Commission), no employee shall (1) perform work or render services for any contractor, association of contractors, or other organizations with which GCHP does business or which seek to do business with GCHP; (2) be a director, officer, or consultant of any contractor or association of contractors; or (3) permit his or her name to be used in any fashion that would tend to indicate a business connection with any contractor or association of contractors.

## Confidentiality



*Confidentiality is the legal and ethical obligation to protect private or sensitive information from unauthorized access, use, or disclosure.*

*Commissioners, employees, workforce members, staff, and contractors shall maintain the confidentiality of all confidential information in accordance with applicable laws and shall not disclose such confidential information except as specifically authorized by GCHP policies, procedures, or applicable law.*

### Duty to Safeguard Member and Medical Confidential Information

Commissioners, employees, workforce members, staff and contractors shall safeguard GCHP member identity, eligibility, and medical information, peer review, and other confidential information in accordance with GCHP's policies and procedures and applicable regulations and law.

## No Personal Benefit

Commissioners, employees, workforce members, staff and contractors shall not use confidential or proprietary GCHP information for their own personal benefit or for the benefit of any other person or entity, while employed at or engaged by GCHP, or at any time thereafter.

## Passwords

Employees, workforce members, staff and contractors must keep their passwords and other personal security codes confidential and will be held responsible for the actions resulting from the use of their passwords.

Employees, workforce members, staff and contractors must not share their passwords or let others use their computer while they are logged on.

## Personnel Files

Personal information contained in employee personnel files shall be maintained in a manner designed to ensure confidentiality in accordance with applicable law.

## Proprietary Information

GCHP 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. GCHP shall safeguard provider identification numbers including, without limitation, Medi-Cal license, Medicare numbers, social security, and other identifying numbers.

## Use of Social Media

When communicating through social media, such as Facebook, X or similar electronic communication, Commissioners, employees, workforce members, staff and contractors must be mindful of their responsibilities to GCHP and GCHP members to protect confidential information and to abide by all of GCHP's policies, procedures and corporate standards. Only employees and individuals authorized to do so may speak on behalf of GCHP. Commissioners, employees, workforce members, staff and contractors must not upload pictures and videos of GCHP offices or employees, workforce members or staff to social media sites that might compromise the security of our offices or employees, workforce or staff or disclose confidential or proprietary information.

## Communications



*Communications refers to written, verbal, and electronic forms of conveying information and messages.*

### Communications

All communications systems, electronic mail, internet access, or voicemail are the property of GCHP and are to be used for business purposes. Commissioners, employees, workforce members, staff, and contractors are advised that communications using GCHP equipment are not private. Commissioners, employees, workforce members, staff, and contractors shall adhere to the highest standards of professional conduct and personal courtesy in the type, tone, and content of all written, verbal and electronic communications and messages.

### Electronic Mail

Commissioners, employees, workforce members, staff and contractors may not use internal communication channels or access to the internet at work to post, store, transmit, download or distribute any information or material that is threatening, knowingly, recklessly, or maliciously false, obscene, or that constitutes or encourages criminal offenses, gives rise to civil liability or otherwise violates any laws. The internal communication channels or access to the internet may not be used to send chain letters, personal broadcast messages or copyrighted documents that are not authorized for reproduction, nor are these channels to be used to conduct a job search or to open misaddressed mail. Those who abuse the communication systems or use them excessively for non-business purposes may lose these privileges and be subject to disciplinary action.

## Conduct



*Conduct encompasses expected behavior, actions, and adherence to ethical and legal standards.*

## No Discrimination

GCHP acknowledges that fair and equitable treatment of employees, workforce members, staff, members, providers, and other persons is fundamental to fulfilling its mission and goals.

Commissioners, employees, workforce members, staff and contractors shall not unlawfully discriminate on the basis of race, color, religion, sex (including pregnancy, childbirth, or related medical conditions), national origin, ancestry, age, physical disability, mental disability, medical condition, family care leave status, veteran status, marital status, place of residence, gender / gender identity, or sexual orientation. GCHP is committed to providing a work environment free from discrimination and harassment based on any classification noted above.

## Reassignment

GCHP, physician groups, and medical groups shall not reassign members in a discriminatory manner, including based on the enrollee's health status.

## Participation Status

*Individuals' level of involvement, engagement, and legal standing within the organization.*

GCHP requires that participating providers and suppliers have valid and current licenses, certificates, and/or registration, as applicable. Commissioners, employees, workforce members, staff, and contractors shall:

- not be currently suspended, terminated, debarred, or otherwise ineligible to participate in any federal or state health care program, including the Medi-Cal program and Medicare programs; and/or
- not have been excluded from participation in federal and/or state health care programs based on a mandatory exclusion at any time; and/or
- have met GCHP requirements regarding felony conviction status as set forth in GCHP policies.

## Disclosure of Participation Status

Commissioners, employees, workforce members, staff and contractors shall disclose to GCHP whether they:

- are currently suspended, terminated, debarred, or otherwise ineligible to participate in any federal and/or state health care program; and/or
- have ever been excluded from participation in federal and/or state health care programs based on a mandatory exclusion; and/or
- have met GCHP's felony conviction status requirements as set forth in GCHP policies, as applicable.

## Delegated Third-Party Administrator Review

GCHP requires that its physician groups, medical groups, and third-party administrators review participating providers and suppliers for licensure and participation status as part of the delegated credentialing and re-credentialing processes.

## Licensure

GCHP requires that all employees, workforce members, staff, contractors, physician groups, medical groups, participating providers and suppliers who are required to be licensed, credentialed, certified and/or registered in order to furnish items or services to GCHP and its members have valid and current licensure, credentials, certification and/or registration as applicable.

## Government Inquiries / Legal Disputes



*Government inquiries refer to official, systematic investigations by a government body to gather information, examine events, or look into potential violations of law or public trust.*

### Government Inquiries and Notification of Government Inquiries

Employees, workforce members, and staff shall notify GCHP upon receipt of government agency inquiries and shall not destroy or alter documents in response to a government request for documents or information. Employees, workforce members, and staff shall notify the Compliance Officer and/or their supervisor immediately upon the receipt (at work or at home) of an inquiry, subpoena, or other agency or government request for information regarding GCHP.

### No Destruction of Documents

Employees workforce members and staff shall not destroy or alter GCHP information or documents in anticipation of, or in response to, a request for documents by any governmental agency or from a court of competent jurisdiction.

# Compliance Program Reporting



*The systematic collection of data and creation of reports to demonstrate an organization's adherence to laws, regulations, industry standards, and internal policies.*

## Compliance Program Reporting

Commissioners, employees, workforce members, staff, and contractors have a duty to comply with GCHP's Compliance Program and such duty shall be a condition of their respective appointment, employment, or engagement.

All Commissioners, employees, workforce members, staff 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 GCHP's own policies in accordance with GCHP's reporting policies and its Compliance Program. Such reports may be made to a supervisor, the Compliance Officer, and/or anonymously to the Compliance Hotline.

Robert Franco, Chief Compliance Officer  
rfranco@goldchp.org, 805-437-5731

Compliance/Fraud Hotline: 1-866-672-2615  
File online at [secure.ethicspoint.com](https://secure.ethicspoint.com)

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# Violations

## Disciplinary Action

Failure to comply with the Compliance Program, including this Code of Conduct, GHCP 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 GCHP's discretion, range from oral correction to termination in accordance with GCHP's policies. In addition, failure to comply may result in the imposition of civil, criminal or administrative fines on the individual or entity and GCHP or exclusion from participation in federal and/or state health care programs.

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## Certification

All Commissioners, employees, workforce members, staff 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 on an annual basis.

## Annual Approval

Gold Coast Health Plan's Code of Conduct must be approved annually by the full Commission.



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