



ALASKA NATIVE  
TRIBAL HEALTH  
CONSORTIUM

# Employee Code of Ethics and Conduct



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# Introduction from Natasha Singh, ANTHC's Interim President/CEO

Dear colleagues,

The Alaska Native Tribal Health Consortium (ANTHC) continues to grow, modernize, and manage financial margins so we can sustainably provide a high level of service for patients and communities. As we experience this time of change and expansion, let's take a moment to focus on the importance of operating with respect, transparency, integrity, and compliance in everything we do.

Doing the right thing in the large and small decisions we face in our jobs is ultimately good for the patients and communities we serve—and for the people and teams we work with day in and day out. One of our constant organizational priorities is maintaining a commitment to creating a company culture that attracts and inspires the best and protects our shared values of self-determination, quality, integrity, and teamwork.

Self-determination is the foundational and inherent right we possess as Alaska Native people to govern ourselves, preserve and practice our cultures, and control the systems that shape our lives without external influence. ANTHC is one example of self-determination in practice, as Tribes and their Tribal health organizations work together to create a health care system that meets their needs by guiding our organizational practices and priorities. Self-determination is so fundamental to the work we do that it's highlighted in the ANTHC Employee Code of Ethics and Conduct, helping us to align strong business ethics with our shared beliefs.

We must always comply with the laws that govern our activities and take appropriate action when needed. Often, the right course of action will be apparent, but the Code of Conduct is also a powerful tool to help guide you in making the right choices. ANTHC employees are expected to uphold the highest ethical standards. That begins with reading, understanding, and adhering to the standards and Code. This is a living document that adapts to meet the shifting workplace realities we experience. The Ethics and Compliance team regularly reviews and develops updates to the Code with employee input. The Code is then vetted and approved by ANTHC Executive Leadership and the Board of Directors.

ANTHC is uncompromising in our commitment to promote integrity in all we do and how we relate to each other, our patients, our suppliers and vendors, and the communities in which we operate and provide services. Thank you for the work you do and for living out the values described in the Code.

Baasee' (Thank you),



Natasha Singh  
Interim President/CEO



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# Message from Allison Reed, ANTHC's Chief Ethics and Compliance Officer

Dear Colleagues,

I'm thrilled to introduce the new ANTHC Employee Code of Ethics and Conduct. Because ethics and compliance are integral to all our operations, we've put a lot of effort into making this Code a user-friendly resource for all staff. We've simplified the content to make it easier to find the information you need, added more learning aids and Q&As to address common questions, and included links for easier navigation and access to relevant policies and procedures.

One change that excites me is reorganizing the topics covered in the Code to reflect our core ANTHC values: Self-Determination, Quality, Integrity, and Teamwork. I believe this new structure effectively demonstrates the fundamental importance of ethical practices to our organization and our daily work.

This Code is crucial, showcasing our dedication to ethical business practices, laws, and regulations. It provides resources to our staff and ensures supervisors know their responsibilities when addressing staff concerns. Everyone needs to familiarize themselves with the Code and know how to access it when necessary.

Thank you for your commitment to maintaining ANTHC's strong culture of compliance and integrity that this Code embodies and promotes. Your adherence to the Code will help ANTHC continue to fulfill its vision of making Alaska Native people the healthiest people in the world.

Sincerely,



Allison Reed

Chief Ethics and Compliance Officer



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# ANTHC's Mission

## Mission

Optimizing health and well-being through collaborative partnerships and services.

## Ethics and Compliance Program Guiding Principles

Ownership

Courage

## ANTHC's Values

Teamwork

Quality

Integrity

Self-determination









# Ownership

Who Does the Code Apply To?

Your Role

Special Responsibilities as an ANTHC Leader

Ethical Decision-Making



# Expectations of Individuals Under the Code

## Who Does the Code Apply To?

Each person at ANTHC, including employees, officers, directors, managers, consultants, vendors, and contractors, must read, understand, and adhere to all relevant ANTHC policies, procedures, and this Code. Compliance is everyone's responsibility.

## Your Role

This Code, along with ANTHC's policies and procedures, provides the information necessary to perform your job ethically and in compliance with applicable laws and regulations.

## Strive to do what is right

The Code cannot account for all scenarios, and in some situations, the proper course of action may be unclear. You must use good judgment. If you observe or are asked to do something that makes you uncomfortable or seems improper, unlawful, or contrary to ANTHC policies or procedures, you should raise concerns with your manager or other key personnel available to you, as discussed later in this Code.

## Seek guidance and ask questions

If something does not seem right, ask your manager, senior leadership, or Ethics and Compliance Services to clarify.

## Report any concerns or violations

If you have observed or are concerned about any possible violations of this Code or any laws or regulations, you have a duty to report this potential violation as discussed later in the Code.

## Take inquiries and investigations seriously

Depending on your role, you may have responsibilities that involve investigating potential violations, or you may be asked to participate in an inquiry or investigation. You must cooperate fully and to the best of your ability.

## Do not retaliate against anyone for reporting a concern or violation

ANTHC prohibits any retaliatory action against employees or members of the workforce who file a complaint in good faith or assist in an investigation. Through our Human Resources and Ethics and Compliance programs, ANTHC encourages employees and members of the workforce to report.

**Those who violate this Code will be subject to disciplinary action as ANTHC deems appropriate, up to and including termination from ANTHC.**

**If you are in a situation that you believe may violate or lead to a violation of this Code, you must report it according to the procedures discussed in this Code.**



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# Special Responsibilities as an ANTHC Leader

As a leader, you are highly visible and influential. Your behavior and actions matter to employees and impact their performance and engagement. It is critical that you set a good example by showing your commitment to the Code and empowering employees to do the same. You are expected to:

- Model ethical conduct, including the standards in the Code, and communicate the importance of this Code to employees;
- Foster an environment where employees feel comfortable coming to you with questions and concerns;
- Take concerns brought to you seriously and respond promptly to employees who raise concerns or seek advice;
- Do not retaliate or condone retaliation against anyone for sharing concerns in good faith or supporting an investigation; and
- Verify employees complete required training.

## Ethical Decision-Making

To ensure that the Code works effectively, it is important to ask questions and voice concerns. ANTHC's ethical culture gives you the freedom to approach any member of management with questions or concerns about ethics or compliance without fear of retaliation. We must all work to take prompt and consistent action against violations of this Code or applicable law. Even though the Code does not offer an answer for every situation, it is important that we have a way to approach new questions or concerns. Please consider the following:

- **Trust your judgment and use common sense.** If something makes you uncomfortable, seems illegal, unethical, or improper, do not do it.
- **Discuss the situation with your supervisor or other leaders.** This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question and will appreciate being brought into the decision-making process. If you are uncomfortable speaking with your supervisor, please speak to other members of ANTHC's leadership team.
- **Seek help from corporate partners.** If you do not feel comfortable approaching your supervisor with your question or have done so but still have a concern, discuss it with Human Resources, Ethics and Compliance Services, or the Office of Legal Affairs.
- **Always ASK first, act later.** If you are unsure of what to do or are uncomfortable in any situation, seek guidance before you act. Ask questions!



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Here are some questions you can ask yourself to guide you through difficult situations:

1. Is there an ethical violation?
2. Should I do something about the violation?
3. What solution would be best?

If you are uncomfortable with or unsure of the answer to these questions, seek help before proceeding.

## Ethical Decision-Making Guide

### Is there an ethical violation?

#### Ask yourself:

- How would I feel if it happened to me?
- Does it hurt anyone?
- How would I feel if everyone knew?
- Does it violate ANTHC values?

### Should I do something?

#### Ask yourself:

- Is it serious?
- Am I responsible?
- Do I have the resources? (Can I handle it alone, or do I need help?)

### What is the best solution?

#### Ask yourself:

- What does the greatest good or least harm?
- Will it work?
- Is it enough?



# Courage

What Do I Do if I Know About or Suspect a Violation of the Code?

How Do I Report a Violation?

What Happens When I Make a Report?

Our Commitment to Non-Retaliation

# Speak Up

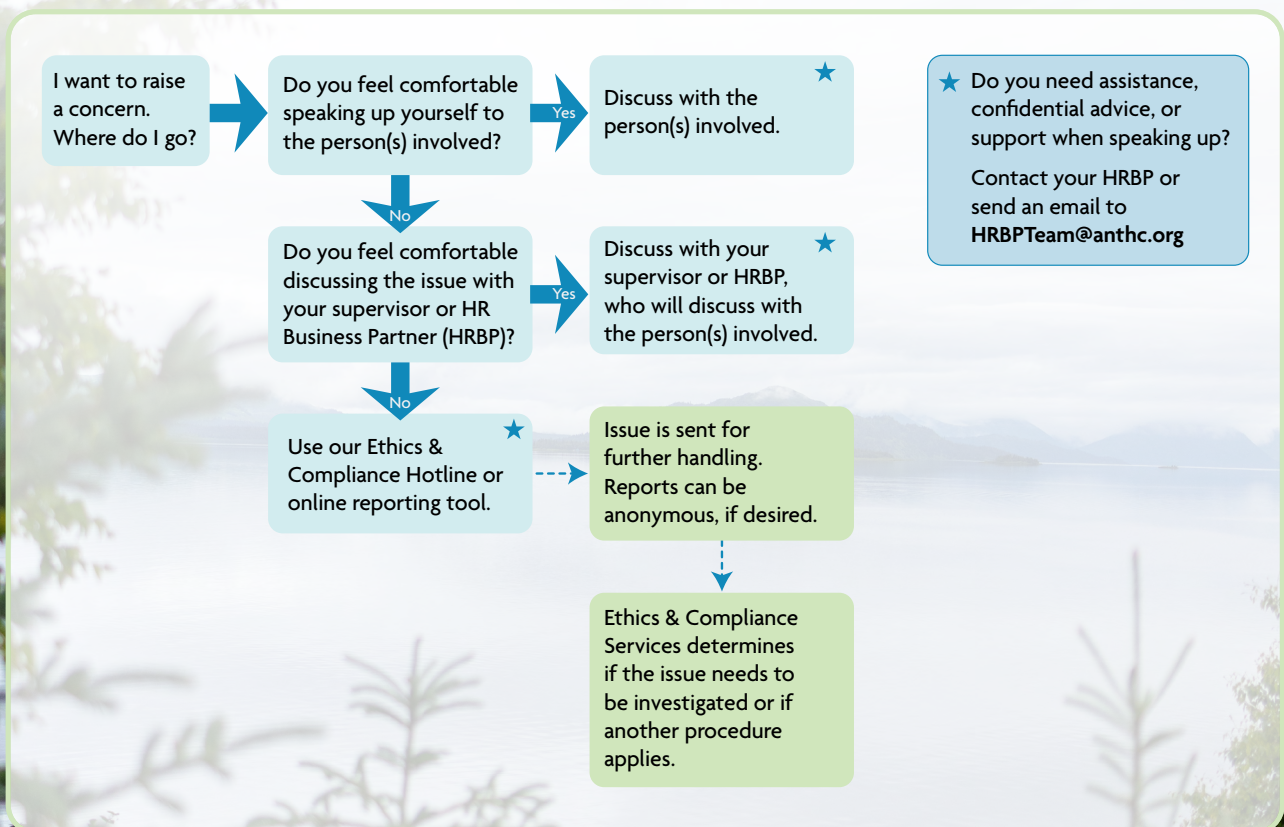
## What Do I Do If I Know About or Suspect A Violation of The Code?

It takes courage to come forward and share your concerns. If you suspect a violation of any laws, rules, regulations, or this Code has occurred, you must proactively and promptly report it. When in doubt about the best course of action in a particular situation, you should report the concern. Failure to report a potential violation may be a cause for discipline.

## How Do I Report a Violation?

While we should try to raise concerns through the existing management within our department, other resources are available. Any leader who receives a report of potential violations of this Code or law must report it immediately to Ethics and Compliance Services. The flowchart below can be used as a guide if you are unsure who to speak to regarding an issue.

## How to Report





## Ethics and Compliance Hotline

ANTHC has established an Ethics and Compliance Hotline that can be used to ask questions or to report suspected or actual unlawful or unethical behavior or violations of rules, regulations, this Code, or internal policies. You can reach the hotline 24 hours a day, seven days a week by visiting [ANTHC.EthicsPoint.com](https://www.anthc.ethicspoint.com), or calling **877-772-6743**.

Reports may be made anonymously via the hotline, but we encourage you to provide your name and a detailed description of your concern to help with the investigation. All information, whether or not you provide your name, will be kept confidential, except as needed to inform individuals involved in the investigation of the complaint.

Employees must cooperate in internal misconduct investigations and refrain from discussing or disclosing information to anyone outside the investigation unless required by law.

### *Tips for Managers*

Leaders are responsible for addressing employee concerns, including listening, discussing, escalating to the appropriate corporate partner, and taking prompt action to resolve matters. Use the following as a guide to ensure you are consistently responding to concerns appropriately:

- Confirm allegations of wrongdoing are reported to Ethics and Compliance Services or report them yourself.
- Maintain confidentiality.
- Do not conduct an investigation unless directed to by Human Resources, Ethics and Compliance Services, or the Office of Legal Affairs.
- Connect with the appropriate corporate partners if you need guidance.
- Encourage cooperation with investigators.
- Avoid making representations about the outcome of the investigation.

# The Investigation Process

## What happens when I make a report?

When a report is received by Ethics and Compliance Services (ECS), the following steps are taken:

### REPORT

- Reports made directly to ECS or through the Ethics and Compliance hotline are promptly reviewed (within 48 hours) and assigned an appropriate investigator.
- Reports will be documented and kept as confidential as possible, to the extent permitted by law.

### REVIEW

- Depending on the nature of the concern, reports may be redirected to another appropriate group, such as Human Resources or Clinical Risk, for follow-up.
- A third-party investigator may be utilized as dictated by ANTHC policies.

### INVESTIGATION

- If you do not report anonymously, the investigator may contact you to collect more information.
- The assigned investigator may also work with subject matter experts to gather information and resolve issues.
- A full investigation may take as little as a few days and up to several weeks.

### CASE CLOSED

- Due to privacy concerns, information will be shared on a need-to-know basis, and sometimes that includes only the people directly involved in pursuing a resolution. As a result, you may not always learn the outcome of the concern you report.
- Any concerns about retaliation for reporting a concern will be promptly addressed.

If an investigation substantiates a reported violation, appropriate corrective actions will be taken to prevent a re-occurrence of the problem, such as clarifying or simplifying processes, technical or software modifications or enhancements, additional training, or disciplinary actions in alignment with our behavior standards and Just Culture.

### Additional Resources:

[Just Culture Policy](#)



# Our Commitment to Non-Retaliation

All reports should be made in good faith. A good faith report is based on an honest, sincere concern. Good faith does not mean that you have definitive proof, but that you have objective reason(s) for a concern. To ensure staff feel comfortable raising concerns, ANTHC will not tolerate any disciplinary action or other type of retaliation being taken against any employee who submits a report in good faith. Any employee who believes they have suffered retaliation should follow established reporting channels or contact Human Resources.

## *Tips for Managers*

As a leader, you must demonstrate commitment to a retaliation-free workplace. Never engage in retaliation and prohibit retaliation against others. Know the actions that are considered retaliation and avoid them. Examples of retaliation include, but are not limited to:

- Terminating, demoting, or suspending
- Threatening or bullying
- Denying a promotion, pay raise, or benefit
- Giving negative performance reviews
- Changing job duties or work schedule
- Setting unrealistic or burdensome expectations

## **Additional Resources:**

[ANTHC Good Faith Reporting and Non-Retaliation Policy](#)

[ANMC Chain of Command for Clinical Care Concerns Procedure](#)



# Teamwork

Respect for Each Other

No Discrimination or Harassment

Substance Misuse

Background and Exclusion Checks

Workforce Safety



# Teamwork: Our collective efforts, talents, and knowledge advance ANTHC's vision.

## Respect for Each Other

We know we will go farther together. We value the individual skills and experiences we each bring to ANTHC. We treat each of our coworkers with respect, share our knowledge, and support the successes of others.

## No Discrimination or Harassment

ANTHC will not tolerate any unlawful discrimination, harassment, or retaliation of any kind.

- **Discrimination** is defined as unjust or prejudicial treatment in the provision of employment rights, opportunities, benefits, or privileges. This can include creating discriminatory work conditions or the use of discriminatory evaluative standards in employment on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law.
- **Harassment** involves any unwelcomed act or series of acts that are based on an individual's status where (1) enduring the offensive conduct becomes a condition of continued employment, or (2) the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

Harassment and hostile environments can be created by unwelcomed or derogatory comments, slurs, derogatory gestures, jokes, displays of objectionable objects, photographs, cartoons, calendars, or posters pertaining to an individual's Protected Status. For example, sexual harassment occurs from unwelcome or unwanted sexual advances, requests for sexual favors, or other verbal or non-verbal conduct of a sexual nature that is sufficiently severe or pervasive as to alter the victim's employment and create an intimidating, hostile, or offensive work environment.

**ANTHC does not tolerate harassment or the creation of a hostile work environment from anyone—a coworker, manager, business partner, or patient. If you believe you are being harassed, or if you have witnessed harassment of a colleague, you need to report this to your supervisor or Human Resources. Refer to the [How Do I Report A Violation](#) section for reporting options.**

### Q&A

Recently, I overheard my manager make an inappropriate comment about another employee that made me uncomfortable. I would usually talk to my manager about a situation like this, but because they are the source of the concern, what should I do?

It is understandable that you would be uncomfortable approaching your manager, but you should report the situation so that it can be reviewed and appropriate actions taken. You may reach out to Human Resources or report through the Compliance hotline.

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## Substance Misuse

Your health and safety are vital. Working under the influence of drugs or alcohol may pose an unacceptable risk to yourself and others. ANTHC prohibits:

- Working under the influence of alcohol, illegal drugs, or controlled substances on or off ANTHC premises;
- Possessing, selling, using, transferring, or distributing illegal drugs or controlled substances while working on ANTHC premises;
- Working while impaired by a prescription medication or over-the-counter drug. If you have a drug or alcohol problem, you are encouraged to seek assistance. Contact Human Resources to learn of available assistance programs. Details regarding our drug testing policy are found in the Drug- and Alcohol-Free Workplace Policy.

### Additional Resources:

[Drug- and Alcohol-Free Workplace Policy](#)

## Background and Exclusion Checks

ANTHC employees and contractors will be subject to background checks prior to hiring or placement and periodically thereafter as allowed or required by law. Employees and contractors must immediately disclose any sanction or exclusion or other event that makes them ineligible from participation in any government-funded program or contract. Any person who is excluded from a government-funded program or contract is ineligible for continued service and will be subject to immediate termination.

## Workforce Safety

ANTHC provides a safe workplace and does not tolerate verbal or physical harassment or intimidation. ANTHC has a zero-tolerance policy for workplace violence. You are prohibited from engaging in any act that could cause another individual to feel threatened or unsafe. This includes verbal assaults, threats, or any expressions of hostility, intimidation, aggression, or hazing. ANTHC also prohibits the possession of weapons in the workplace. Our zero-tolerance policy for workplace violence applies to behavior on or off campus, as well as to the behavior of our employees engaged in ANTHC business anywhere outside of our campus.

Don't wait – speak up and report threats or potential violence immediately to management.

### Additional Resources:

[Safety Program Policy](#)

[Safety Policy](#)

[Workplace Violence Prevention and Response Policy](#)



# Quality

Focus on Quality

Commitment to a Just Culture

Business Partners and Shared Values

Conflicts of Interest

Gifts, Meals, and Entertainment

Privacy, Information Protection, and Security

Commitment to Responsible Use of Artificial Intelligence (AI)

External Communication and Social Media

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# Quality: Our work demonstrates a commitment to excellence, continuous improvement, accuracy, and professionalism.

## Focus on Quality

From treating our patients to documenting financial transactions, we maintain a consistent focus on quality. ANTHC is committed to providing services and conducting business at the highest level of quality.

## Commitment to a Just Culture

In our commitment to providing top-notch health care and ensuring safety, ANTHC is focused on encouraging an open and non-punitive approach to reporting safety issues and learning from mistakes, near misses, and unsafe conditions. We use clear, fair, and transparent processes based on risk to distinguish between human and system errors and intentional harmful actions. A fair culture is the basis for establishing a secure and high-quality environment for ANTHC's health care services.

## Business Partners and Shared Values

Business partners are integral to ANTHC's workforce and include consultants, service providers, vendors, and independent contractors. We count on reliable and ethical business partners to bring the best value to patients, ANTHC staff, and our stakeholders. Our business partners' actions reflect on ANTHC's reputation. It is important we select business partners who share our values. We follow procurement policies and applicable laws when choosing business partners and executing contracts.

## Conflicts of Interest

A conflict of interest occurs when an employee's financial or personal interest could interfere or even appear to interfere with the interests of ANTHC, to the extent that it would be difficult for that employee to perform their ANTHC work objectively and effectively. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with your supervisor or Ethics and Compliance Services.

Areas of possible conflicts of interest include, but are not limited to, the following:

- **Outside Employment and Activities:** Employees must disclose all outside work activities and board memberships, whether paid or voluntary.
- **Relationships in the Workplace:** Any employee in a leadership role must disclose any romantic or sexual relationship with another coworker. Any employee must disclose any romantic or sexual relationship with another coworker in their same department.
- **Family Status:** Employees must disclose any supervisory or reporting relationships with family and relatives (e.g., spouse, children, parents, siblings).
- **Research-Related Financial Conflicts:** Investigators on research projects must disclose any significant financial interest of the investigator and of the investigator's spouse and dependent children and any reimbursed or sponsored travel.



## How do I identify a Conflict of Interest?

### Ask Yourself:

- Am I using an ANTHC resource or business relationship for my benefit?
- Do I have a relationship that may appear to impact my decisions for ANTHC?
- Do I have an ownership stake in a business that works with ANTHC?
- Would someone question my judgment based on something I'm doing outside of work or a relationship I have with a business partner?

## Q&A

My department director has selected a vendor that his brother operates. What should I do?

Speak up! Directing business to a vendor that is owned, managed by, or employs a close relative of an associate is a prohibited conflict of interest. These facts must be reported immediately to Ethics and Compliance Services.

## Reporting a Potential Conflict of Interest

Staff should disclose any potential conflicts of interest, such as outside employment, family status, or gifts received to HR or Ethics and Compliance Services. Designated staff will be required to complete an online disclosure questionnaire annually and update these disclosures as needed.

## Gifts, Meals, and Entertainment

Ethical relationships with business partners are critical to supporting ANTHC's mission. Occasional meals and business courtesies can help facilitate legitimate discussions about ANTHC's services and needs. However, ANTHC may not give or receive gifts, meals, entertainment, recreational activities, or other valuable items in a manner that could improperly influence a clinical or business decision. In the U.S., federal and state laws limit what vendors can provide health care professionals. When interacting with vendors, ANTHC must abide by the guidelines and restrictions for providing and receiving gifts, meals, and entertainment found in our [Conflict of Interest Policy](#). Employees may not accept gifts, tips, or favors of substantial value from customers or vendors. All gifts over \$100 must be declined.

## Courtesies and gifts may be accepted if:

- It is related to a legitimate business purpose.
- It is not cash or a cash equivalent (e.g., gift card).
- It is not requested or offered in exchange for making a business or procurement decision.
- It is offered in an open and transparent way (i.e., not hidden or disguised).
- It is of modest value and helps improve business, political, or community relationships.
- In some circumstances, ANTHC employees can accept corporate gifts of significant value to follow local custom. This is acceptable if the gift becomes ANTHC property for proper accounting and disposition.

### Q&A

A business partner wants to reward your employees with a gift card for working efficiently and effectively on a project. What should you do?

ANTHC leaders should consider internal employee recognition measures to reward ANTHC employees for extra efforts when they successfully support a project or service for a business partner.

### Additional Resources:

[Conflict of Interest Policy](#)

[Nepotism Policy](#)

[Outside Employment and Activities Policy](#)

[Relationships in the Workplace Policy](#)

[Research-Related Financial Conflicts of Interest Policy](#)

[Vendor Visits and Solicitation at ANMC Policy](#)

## Privacy, Information Protection, and Security

Employees, officers, directors, and business partners must maintain the confidentiality of patients, personnel, and other sensitive or proprietary information. Sharing confidential information with other employees or individuals outside the organization is strictly prohibited unless the requester has a legitimate business-related need and the information is shared appropriately to ensure its protection. Confidential information includes, but is not limited to, protected health information, which must be accessed, used, or disclosed in accordance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and ANTHC's privacy and security policies. It also includes all non-public information that could harm ANTHC or its patients if disclosed. The obligation to preserve confidential information continues even after employment with ANTHC ends.



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Any incident involving unauthorized access to, use of, or disclosure of personal information, as well as any unavailability of systems or applications that maintain personal information, must be immediately reported to the ANTHC Privacy Officer.

**Additional Resources:**

[Health Information Privacy Rule Policy](#)

[HIPAA and the Privacy Act Procedure](#)

[Information Privacy, Security, and Integrity Management Policy](#)

[Workforce Privacy Practices](#)

## Commitment to Responsible Use of Artificial Intelligence (AI)

ANTHC is committed to deploying Artificial Intelligence (AI) systems transparently and responsibly. We recognize that AI-related capabilities are increasingly important to enable data analyses and insights to advance health. When we leverage AI, we ensure that the use of AI systems has a clear purpose that respects patient and staff rights and is accurate, truthful, not misleading, and appropriate for the intended context.

## External Communication and Social Media

**Media Inquiries:** If you are contacted by any member of the media and asked to discuss ANTHC business, do not provide any information. Instead, advise the outside party that you are not authorized to discuss the subject and refer them to the Marketing and Communications Department.

**Social Media:** Social media, like Facebook, Instagram, and LinkedIn, is an integral part of our personal and professional lives. It is appropriate to celebrate and discuss ANTHC while protecting the privacy, safety, and dignity of friends, patients, and coworkers. You may not post sensitive, proprietary, confidential, or unpublished financial information about ANTHC or any Protected Health Information (PHI) on social networking sites and blogs. Communicating confidential or proprietary information about ANTHC or PHI is prohibited and is grounds for immediate termination. This prohibition does not apply to discussions regarding the terms and conditions of employment.

### *Tip for Managers*

Executives, officers, directors, and senior leaders have a special responsibility when posting communications, since their opinions may be deemed to express the position of ANTHC.

**Additional Resources:**

[Media Contact and Contributions Policy](#)

[Social Media Policy](#)

# Integrity

Compliance with Regulatory Obligations

Accuracy in Financial Practices

Accuracy in Billing Practices

Fraud, Waste, and Abuse

Anti-Kickback Law and Stark Law

Excluded, Denied, and Restricted Party Screening

Regulation of Controlled Substances

Responding to Governmental Inquiries



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# Integrity: We lead by example, communicate honestly, and act with respect.

## Compliance with Regulatory Obligations

Ensuring compliance with regulatory obligations reflects our organization's unwavering commitment to integrity and ethical business practices.

## Accuracy in Financial Practices

ANTHC payments and other transactions are to be properly authorized by management and are to be accurately and completely recorded in accordance with generally accepted accounting principles and established ANTHC policies. This serves as a basis for managing ANTHC business and is important in meeting obligations to patients, vendors, and others. ANTHC's high standard of accuracy and documentation is necessary for tax and financial reporting requirements. The duty to report accurate and truthful information also applies to our internal dealings. All work time and expense records are to be reported accurately and honestly.

## Accuracy in Billing Practices

ANTHC is committed to accurate billing that complies with laws and policies. Staff must accurately document and report all services and supplies billed. ANTHC prohibits false or fraudulent claims and will promptly return overpayments.

## Fraud, Waste, and Abuse

Fraud, waste, and abuse are prohibited and undermine our integrity, values, and long-term success. ANTHC's Ethics and Compliance Services department, routine audits, program staff monitoring, and internal controls, help ANTHC prevent and detect fraud, waste, and abuse. ANTHC expects employees to report known or suspected activity of this type to Ethics and Compliance Services. Employees who report false claims or other fraudulent conduct or who otherwise assist in an investigation, action, or testimonies are protected from retaliation to the furthest extent possible under both federal and state laws.

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## Anti-Kickback Law and Stark Law

ANTHC prohibits its employees and other workforce members from offering, paying, asking for, or accepting any money or other benefit in exchange for patient referrals, purchases, leases, or orders. All contracts and interactions with other referral sources must adhere to all applicable laws and regulations.

- **The Anti-Kickback Law** prohibits offering or receiving anything of value to induce referrals for Federal health care programs.
- **The Stark Law** prevents physicians from referring Medicare patients for designated health services to entities with which they have a financial relationship unless an exception applies. It also prohibits designated health services entities from submitting Medicare claims for services resulting from a prohibited referral.

### Additional Resources:

[Fraud, Waste, and Abuse Policy](#)

## Excluded, Denied, and Restricted Party Screening

ANTHC will not employ or conduct business with individuals or entities that have been denied, debarred, or excluded through relevant sanctions or regulations. ANTHC employees must notify Human Resources if they are listed as excluded from federal or state health care programs.

## Regulation of Controlled Substances

Many prescription drugs, controlled substances, and other medical supplies are governed and monitored by specific regulatory organizations and are to be administered by an authorized provider's order only. Prescription and controlled medications and supplies are to be handled properly and only by authorized individuals to minimize risks to ANTHC patients.

## Responding to Government Inquiries

Employees should consult with the Office of Legal Affairs and Ethics and Compliance Services before responding to non-routine requests from or on behalf of local, state, or federal government to ensure that contacts with government entities are handled properly. ANTHC employees are to cooperate with any government inquiry and always be clear and truthful in response to those inquiries. When an employee is aware of an existing or potential government inquiry, they are not to alter or destroy records and should consult with the Office of Legal Affairs if there are questions.



# Self-Determination

Using Self-Determination to Advance Our Vision

Native Preference

Ethical Research and Tribal Approval

# Self-Determination: We support and promote Alaska Native self-determination.

## Using Self-determination to Advance Our Vision

ANTHC is the largest Tribal health organization in the nation, and self-determination is central to our success. Native leaders guide our organization and determine our strategic direction. Our leaders have prioritized policies that advance and protect Alaska Native and American Indian individuals and organizations.

## Native Preference

ANTHC is committed to attracting, motivating, and retaining an inclusive and diverse workforce. ANTHC applies Alaska Native/American Indian preference as required or permitted by the Indian Self-Determination and Education Assistance Act and other applicable laws.

ANTHC also provides a preference to Alaska Native and American Indian individuals and organizations in awarding contracts and grants as permitted or required by law and ANTHC policies.

### *Tip for Managers*

Managers should ensure that they are familiar with Native preference policies. It's essential to integrate these preferences into the organization's hiring, contracting, and awarding processes.

ANTHC provides preferences, incentives, and support to Alaska Natives and American Indians in employment policies, practices, and programs, including education and training opportunities, and takes other appropriate action to ensure their unique contributions are given appropriate recognition and value.

### **Additional Resources:**

[Alaska Native and American Indian Preference Policy](#)  
[Purchasing and Procurement Policy](#)

## Ethical Research and Tribal Approval

ANTHC conducts research activities according to the highest ethical standards and fully complies with federal and state laws and regulations. Research conducted by ANTHC is Tribally driven. This means that the Alaska Area Institutional Review Board and the ANTHC Board of Directors oversee and approve research that addresses ANTHC health priorities and supports research necessary to improve Alaska Native health care and health status.



Ethical approaches to research recognize that culture and traditions vary greatly between Alaska Native communities. Alaska Native individuals and communities also vary in adherence to their cultures of origin and to Western cultural values and beliefs. Tribal Review Boards and other entities that oversee research for American Indian and Alaska Native people each follow their own Board of Directors policies and procedures, which are important and unique. They reflect and respond to community needs, changes in research, and revisions to research policy.

ANTHC has research standards, policies, and procedures in place to preserve truth, integrity, and credibility in research, to prevent research misconduct, and to deal efficiently and fairly with allegations or other indications of research misconduct.

### **Additional Resources:**

[Accelerated Review Procedure](#)

[Human Subjects Research Policy](#)

[Research Misconduct Policy](#)

[Research-Related Financial Conflicts of Interest Policy](#)

## **Administration**

The Board of Directors, through the Ethics, Compliance, Quality, and Safety Committee and the Finance and Audit Committee, will help support the proper administration of this Code. Both committees are responsible for monitoring compliance from a health care regulatory perspective and a financial point of view.

## **Officers, Managers, and Supervisors**

All officers, managers, and supervisors shall be available to answer questions about this Code with their employees. Officers, managers, and supervisors are also responsible for the diligent review of practices and procedures in place to maintain compliance with this Code.







ALASKA NATIVE  
TRIBAL HEALTH  
CONSORTIUM

# Employee Code of Ethics and Conduct 2025

