



**NORIDIAN**

HEALTHCARE SOLUTIONS

*Elevating Operations, Enabling Care.*



# CODE OF CONDUCT

Revised February 2025



# MESSAGE FROM THE PRESIDENT

Dear Team Members,

Doing the right thing and living out our value of integrity is woven into the very fabric of who we are as an organization. Many of our responsibilities are performed for government customers, who are a vital part of our business. While they demand the highest ethical conduct from us, we pursue these standards, regardless and operate under one code of conduct.

You play a vital role in this pursuit, and it's important you understand our Code and how it applies to your work. This document contains valuable information that will serve as a guide to assist you in assessing and responding to any questionable situation you might face.

As with any organization, while we continually strive for excellence, we are humans and will fall short at times. We understand mistakes will happen, but the only way we can learn from them is if everyone feels safe enough to report. As your CEO, you have my personal commitment that all team members can speak up if something doesn't feel right.

In our Code, you will find guidance on how to report concerns without fear of retaliation. If you ever find yourself in a difficult situation, it is my hope you feel you can reach out to your leader directly. But if there's ever a time when you don't feel comfortable, you can contact our Compliance Officer directly.

Thank you for your commitment to doing the right thing in accordance with the principles of our Code. Our continued success, growth, and future depend on it.

Sincerely,

A handwritten signature in black ink that reads "Jon Bogenreif". The signature is written in a cursive, flowing style.

Jon Bogenreif  
President & Chief Executive Officer



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# NORIDIAN VALUES AND BEHAVIORS

## OUR VALUES

Noridian designs and delivers solutions that support the administration of healthcare programs. Noridian's values and behaviors are at the heart of how we operate to achieve our mission and objectives. These values include:

### CONSTANT INNOVATION

We seize opportunities to advance progressive change.

### SERVICE EXCELLENCE

We provide value through quality service.

### RESPONSIBLE STEWARDSHIP

We manage all resources entrusted to us with efficiency and care.

### EFFECTIVE COLLABORATION

We work together toward a common purpose.

### INTEGRITY

We do the right thing.

## SPEAK-UP CULTURE

Everyone is expected to maintain high ethical standards, always strive to do the right thing, and be accountable for their own actions. Each of us is also responsible for understanding the rules. If there is ever a time when you do not understand the rules or you are not sure what to do, you are obligated to speak up and ask. Throughout this document, you will learn more about how different laws and rules affect Noridian, and examples of issues that might require you to speak up to someone.

## SAFE & RESPECTFUL WORKPLACE

We are committed to maintaining a safe and professional working environment where everyone is treated with dignity and respect. This applies to the way we treat each other and how we treat our customers and business partners. Noridian does not tolerate improper behavior. If you witness improper behavior, or you ever feel you are mistreated, you must let someone know so it can be addressed.

The Employee Handbook provides additional information about our commitment to maintain a safe and respectful workplace.

### FOR MORE INFO

[Noridian Employee Handbook](#)



# COMPLIANCE & ETHICS PROGRAM

## PROGRAM OVERVIEW

Noridian's Compliance and Ethics Program follows the recommendations of the United States' Office of Inspector General (OIG). To help ensure we operate with the highest standards of integrity, the following fundamentals guide our program:

- A Compliance Officer that every team member can talk to directly.
- Established standards, procedures, and policies.
- Education and training on how to report concerns.
- Auditing to make sure we are doing what we are supposed to do.
- A hotline for anonymous reporting.
- Disciplinary guidelines and actions for when someone does the wrong thing.
- Conducting fair and thorough investigations promptly.

## REPORTING A CONCERN

Corporate misconduct can threaten the livelihood of an entire company. When someone quickly reports misconduct, it can help the company reduce negative impact. Honestly, speaking up may sound easy but in the moment, can feel intimidating. There are numerous ways you can report, including reporting anonymously\*. If you have a concern, you can:

- Talk about it with your leader who is obligated to follow up.
- Contact the Compliance Officer or Compliance and Ethics staff directly by phone, email, or in-person.
- Write to Compliance and Ethics, PO Box 242, West Fargo, ND 58078\*
- Click on the Noridian Now EthicsPoint\* link.  
[noridiansolutions.ethicspoint.com](http://noridiansolutions.ethicspoint.com) or  
[noridiansolutionsmobile.ethicspoint.com](http://noridiansolutionsmobile.ethicspoint.com)
- Call the EthicsPoint Hotline\* at 1-833-221-5155



Scan this image with  
your cell phone\* to go  
directly to EthicsPoint

## NO RETALIATION POLICY

Whatever way you decide to make the report, Noridian has a no retaliation policy. This means no one can take an adverse action against you because you raised a concern. Retaliation for reporting will NEVER be tolerated at Noridian, and if you think this is happening, you should report it immediately.



## INVESTIGATIONS

### CULTURE AND PHILOSOPHY

At Noridian, we believe in creating a fair and just culture. This means we hold you responsible only for what you can control. These are things such as:

- Understanding and following the rules including policies, procedures, and work standards.
- Living our values of integrity and following all behavior expectations.
- Speaking up when something is not right, or you do not understand.
- Being engaged and respectfully holding others accountable for following the rules.

In turn, Noridian has a duty to take all the steps needed to maintain a culture where people are treated fairly. This includes:

- Respecting the complexity of every situation and investigating in an unbiased way.
- Finding the true “root cause(s)” and not oversimplifying a problem by immediately finding blame.
- Recognizing that most mistakes and failures are complex and require open-mindedness and objectivity to help the organization improve.
- Separating human error from reckless or negligent behavior and addressing them differently.
- Making sure disciplinary action is appropriate and fair.

### OBLIGATION TO COOPERATE

All team members including employees, contingent workers, board members, contractors, and vendors are expected to fully cooperate with any internal or external investigation. Noridian prohibits any of the following:

- Lying to or misleading an investigator
- Hiding information
- Altering or destroying documentation to hinder or change the outcome of an investigation
- Attempts to intimidate, threaten, coerce, or influence others
- Retaliation of any kind

## WHAT IF?

**Q: I believe my coworker violated one of our policies. I'm worried I'll get in trouble if I say something. What should I do?**

**A:** You should speak up. You are protected from retaliation if you make a good faith report about a potential violation or cooperate in an investigation. "In good faith" means you believe the information is true and correct to the best of your knowledge.



## CONFLICTS OF INTEREST

A conflict of interest (COI) occurs when a personal situation competes (or appears to compete) with Noridian's interests. There are different ways conflicts can occur, such as through family and/or financial relationships. Actual and potential conflicts are a normal part of business, but it's important to report them so we can develop a plan to make sure we limit any impact.

Some examples of conflicts include things like:

- A family member who works for a provider that files Medicare or Medicaid claims.
- A family member who also works at Noridian.
- A second job with a healthcare or healthcare-related company.
- A family member who owns a medical billing company.
- A close personal relationship with someone who could benefit from things you learn at work.
- Serving on a board of a business partner or potential client.

## WHAT IF?

**Q: My daughter works for a company that sells goods Noridian would like to buy. Can Noridian do business with this vendor?**

A: Yes, but only if you are not involved in the decision-making process. If Noridian starts doing business with this vendor, you must contact Compliance and Ethics and ensure you do not make decisions about or perform work related to her company.

## CONFLICT OF INTEREST POLICY

Many Noridian team members are required to complete the conflict of interest disclosure process each year.

**Every team member is responsible for reporting conflicts, even if you are not assigned to complete the disclosure process.** It is important everyone remember the following:

1. ALL potential conflicts MUST be reported. If you are unsure, you should email Compliance and Ethics at [noridiancompliance@noridian.com](mailto:noridiancompliance@noridian.com) and/or speak to your leader.
2. If you are required to complete an annual disclosure, make sure you get it done timely and include as much information as possible.
3. If there is ever a time when you are not sure you can act with undivided loyalty to Noridian's interests, you must refrain from taking part in the transaction or decision **and** disclose the issue to Compliance and Ethics.
4. Deliberately withholding conflict information can cause harm to Noridian and is a violation of our Code.

### FOR MORE INFO

[Conflicts of Interests](#)



## GIFTS AND BUSINESS COURTESIES

Business courtesies are things that normally cost money but are given for free because of a business relationship. A list of common business courtesies includes things like:

- Food and drink provided in connection with a business gathering
- Reimbursement for travel or transportation
- Paid event sponsorships
- Free or reduced admission to a conference, seminar, or training program
- Door prizes and raffles
- Entertainment and recreation including tickets, discounts, or free passes

**We should never give or accept business courtesies or gifts if the intent is to influence decisions.**

There are times when business courtesies are allowed, but they may never be given or accepted if the *intent* is to influence. A good rule of thumb is: If you or your family could gain personally, or if the offer is made to get favorable treatment, do not do it. Giving and receiving gifts to influence business decisions is not only unethical, but it is also illegal.

### FOR MORE INFO

[Gifts and Courtesies](#)

Discuss with your leader or report business courtesies in NAVEX.

Noridian has established rules and guidance for navigating gifts and business courtesies, and all team members, vendors, and business partners **must** follow our rules.





## PROTECTING ASSETS AND INFORMATION

Noridian safeguards all sensitive information. The nature of our business gives us access to substantial amounts of protected information, technology, sensitive communications, and many other confidential items. An important part of our overall compliance program is making sure each person understands their individual responsibilities. This involves things like:

- Following our confidentiality and privacy policies.
- Refraining from using confidential information for personal gain.
- Using technology appropriately and as instructed.
- Locking devices when left unattended.
- Using only approved methods and encryption for transmitting sensitive information.
- Maintaining professional conduct when using the internet.
- Completing privacy and security training timely.
- Using Artificial Intelligence appropriately.

Privacy and Security rules are complex. Sometimes it can be hard to understand how these policies and procedures affect your work directly. Noridian's Privacy officer and our Security Officer can help.

## INTERNAL CONTROLS

Internal controls help us meet our obligations to our customers and manage business risks at Noridian. Internal controls are planned actions we build into our processes to help make sure things are consistently done right. Their purpose is to:

- Promote effective and efficient operations.
- Ensure reliable financial and operational reporting.
- Maintain compliance with Noridian's values and all laws and regulations that apply to our business.

Internal and external audits help make sure our internal controls are working as intended. But it is not possible to audit everything. That is why it is up to you to understand the internal controls that affect your work and speak up if you believe something is not working properly.



## WORKING WITH THE GOVERNMENT

Our state and federal government work is a vital part of our business, and there are unique standards that apply to us because of our role as a government contractor. Some examples include:

- Following anti-trust laws
- Adhering to labor laws
- Complying with procurement integrity requirements
- Ensuring proper charging of costs on our contracts
- Refraining from making false claims, statements, and certifications
- Protecting sensitive information

Failure to follow these rules can hurt the company. It is not possible to include all the rules in this document, but we cover some of the most common ones for you to know.

### SELF-REPORTING

If we have credible evidence of certain types of violations of federal or state law, we are required to tell the government.

#### FOR MORE INFO

[Self-Reporting](#)

### CONTRACT BIDDING & ORGANIZATIONAL CONFLICTS OF INTEREST

When we bid on contracts, we must be fully honest with our pricing and follow antitrust laws. Also, former government employees who now work at Noridian may be limited in what they are allowed to do on our contracts.

Organization Conflict of Interest (OCI) rules exist to make sure there is fair competition in the market for government contract work. Noridian does not accept work that creates an OCI without first adopting a government approved OCI mitigation plan.

#### FOR MORE INFO

[Contract Bidding](#)

[Organizational Conflicts of Interest](#)



## FRAUD WASTE AND ABUSE

As a government contractor, we have a key role in preventing fraud, waste, and abuse (FWA). First, Noridian is responsible for identifying, preventing, correcting, and reporting FWA by providers, suppliers, members, and beneficiaries. This could be things like:

- Claims not supported by the required documentation.
- Over- and under-utilization of services.
- Misrepresentations when enrolling in government programs.

Noridian's Benefit Integrity Department works closely with government agencies to combat FWA.

Second, we are committed to make sure we manage our *own* resources appropriately. Noridian is paid to do work for the government, so we must be diligent about identifying and correcting any potential violations within our own company. This includes:

- Misuse of corporate assets
- Falsifying timesheets or any type of timekeeping errors
- Charging the government for unallowable costs
- Wasteful practices or violations of our contracts with CMS

We are responsible for managing costs truthfully, and we must never submit for reimbursement of costs that we know are inaccurate.

## EXCLUDED OR INELIGIBLE PERSONS

We are not allowed to do business with anyone who is ineligible for federal program work. This means we will not employ or contract with someone who has been convicted of crimes involving government business. One of the ways we do this is through background checks. We do them upon hire and periodically repeat them for employees. If a team member receives a felony conviction or becomes excluded, they are required to report it to Human Resources or Compliance and Ethics immediately. Hiding this information is a violation of this Code.

## WHAT IF?

**Q: I have ideas for streamlining our processes. This could save the government money, but I'm not in charge of our processes. What should I do?**

**A: You should share your ideas with your leader. We are each responsible for responsible stewardship of our resources.**

### FOR MORE INFO

[Fraud, Waste and Abuse](#)

### FOR MORE INFO

[Excluded or ineligible persons](#)



## **PURCHASING RULES, PAYMENTS TO AGENTS, AND SUBCONTRACTING**

Noridian has a policy we follow when making purchases for our government contracts. This policy helps make sure we pay the right costs for goods and services and helps us avoid conflicts, support small businesses, and avoid contingent fee arrangements (which are generally not allowed).

When we have an agreement with another person or entity (such as a consultant), that agreement must be in writing. That agreement should also be clear about the services, fees, and payments. This applies to all relationships, including when Noridian is a subcontractor and when we subcontract work to another company. We are always responsible for understanding and following the laws, rules, and contract terms.

### **FOR MORE INFO**

[Purchasing Policy](#)





## OUTSIDE NOTICES

### NOTICE TO EMPLOYEES CONCERNING WHISTLEBLOWER RIGHTS

Noridian is fully committed to operating with integrity and compliance with all laws and rules regarding whistleblower protection. As stated above, we have a ZERO retaliation policy.

#### FOR MORE INFO

[Whistleblower rights](#)

## SUMMARY

We are all responsible for behaving in a way that supports the mission of our organization and ensuring we conduct our work following the highest ethical standards. Under Noridian's Code, everyone has an ethical responsibility to speak up if they believe something is not right. If you know or suspect something is wrong, and you do not speak up, you are violating our Code.

It is not possible for any Code to include every scenario, so if you are ever uncertain, you must speak up and ask for clarification. Noridian's Compliance and Ethics Department is here to help.



# APPENDIX



**NORIDIAN**  
HEALTHCARE SOLUTIONS

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## CONFLICTS OF INTEREST

We should not put ourselves into situations where our objectivity or ability to be unbiased could be questioned. Even the appearance of a conflict of interest can put our reputation at risk.

**Q: I work as a Medicare claims processor. I want to accept a job working part-time (on weekends) for a physician's office doing medical billing. Is that ok?**

A: This could create the appearance of a conflict of interest. The part-time job could involve submitting Medicare claims to Noridian. Because your role at Noridian involves paying Medicare claims, you may be in a position to influence the payment of the physician's claims. You should discuss this with your leader and reach out to the Compliance and Ethics Department. Compliance will work with your leader to evaluate the situation and determine if you should decline the position or if there is a way to resolve the conflict.

We strive to be fair and avoid favoritism. No one should be in a position where they supervise or make employment decisions that involve their immediate family member or significant other.

**Q: My family member also works at Noridian and had a job change that could be a conflict with my job. What should I do?**

A: Report these types of changes to your leader and to Compliance and Ethics right away.

**Q: My daughter works for a company that sells goods Noridian would like to buy. Can Noridian do business with this vendor?**

A: Yes, but only if you are not involved in the decision-making process and those who are objectively making the business decision determine that doing business with this company is in Noridian's best interests. If Noridian starts doing business with this vendor, you must contact Compliance and Ethics and ensure you do not make decisions about or perform work related to her company.

## GIFTS & BUSINESS COURTESIES

If gifts or business courtesies are offered to obtain or reward business, they may be considered a kickback or a bribe. Gifts or business courtesies should never be offered or accepted if the intent is to obtain or reward business or influence decisions.

If doing international business, our commitment to compliance extends to international requirements as well. Noridian follows the rules under the Foreign Corrupt Practices Act (FCPA).

When we give business courtesies, they must be reasonable, customary, and appropriate. There are two general rules we follow:



**20/50 Rule for Government Employees:** We cannot offer a federal, state, or local government employee (or their family member), courtesies valued over \$20 on one occasion, and not over \$50 annually. Nominal gifts, like coffee, pretzels, soft drinks, greeting cards, etc. are acceptable. Before you offer anything other than a nominal item to a government employee, reach out to the Compliance and Ethics Department for approval.

**50/150 Rule for Everyone Else:** We cannot offer or accept gifts valued over \$50 on one occasion or above \$150 annually. If you are not in a management or decision-making position, you may ask the Compliance and Ethics Department for an exception.

**Business Courtesies**

Category	Single Occurrence	Annual Limit
Giving to Government Employees (and their family members)	\$20	\$50
Accepting Gifts from Government Employees	Only nominal hospitality items	Only nominal hospitality items
Giving to anyone else	\$50	\$150
Receiving from anyone else	\$50	\$150
* You may request an exception from Compliance and Ethics if you are not in a management position.		

Even if a business courtesy has a value of \$50 or less, it should not be offered or accepted if it appears to be intended to influence a business decision or to gain favor.

## COMMONLY ASKED QUESTIONS - GIFTS

**Q: I received a basket of promotional items from a vendor. The fair market value is under \$50. Am I allowed to keep this?**

A: Yes, promotional items are allowed since they generally fall under our guidelines.

**Q: What kind of business courtesies are usually acceptable?**

A: Nominal gifts, such as coffee mugs, candies, nuts, or promotional items

**Q: I have a gift situation that falls outside of these guidelines. What should I do?**

A: Contact Compliance and Ethics. They will consider the situation and advise you.

**Q: Can I accept a gift card?**

A: It depends on the kind of gift card. Gift cards from commercial vendors (example: coffee or restaurant) are allowed. However, you can't accept a gift card issued by a credit card company (example: Visa) or other financial institution. These types of gift cards are equivalent to cash and accepting them is against the law.





**Q: Can I accept gifts from government personnel?**

A: Generally, no, but there are exceptions:

- You may keep the gift if it was given solely because of your pre-existing family or personal relationship. For example, you may accept a birthday gift from a relative who works for CMS.
- If your family member receives a business courtesy from government personnel because of your role at Noridian, the \$50/\$150 limits will apply.
- As a Noridian associate, you are only allowed to receive nominal items of hospitality.

**Q: All attendees at a work-related conference were invited to a dinner hosted and paid for by the conference organizer. May I accept the invitation?**

A: If this is offered to all conference attendees at no additional cost, the dinner would be considered a legitimate business activity and may be accepted, if it does not appear to be lavish or attempting to influence Noridian decisions.

**Q: A vendor offered me four tickets to a ball game. What should I do?**

A: Generally, we should not accept tickets to sporting and music events. Before you accept the tickets, contact Compliance and Ethics. They will consider things like the face value of the ticket, if there is a legitimate business purpose, and your job responsibilities.

**Q: My department is very interested in a vendor's products. The vendor invited me on a trip to San Diego for a training class to learn more about their products. They offered to pay for my hotel and airfare. Can I accept this?**

A: In this scenario, attending the training class would benefit Noridian, so it would be appropriate for you to attend. However, Noridian should pay for the travel and hotel expenses. Allowing the vendor to pay for the trip may create the appearance of a conflict of interest. This could damage Noridian's reputation, especially if Noridian decides to buy products from the vendor.

**Q: At a work-related conference, my name was entered in a random drawing, and I won Apple AirPods valued at \$199. Is this okay to keep?**

A: The value of the prize is more than maximum value in our 50/150 Rule, but you may be able to keep the prize depending on your job responsibilities at Noridian and if you have decision-making authority over the prize giver. You need to report it to Compliance and Ethics. They will review the situation and confirm whether you are allowed to keep it.

We might be asked to participate in external forums, conferences, or advisory boards because we are Noridian employees. Sometimes these invitations include honorariums, such as the payment of registration fees, travel, and lodging. Usually, these offers should be declined, especially if it could appear our objectivity could become biased.



**Q: I work in the Finance Department and have my Certified Public Account (CPA) license. I have been asked to speak at a conference for my professional association. In return for speaking, the association has offered to waive my conference registration fee. May I accept this?**

A: You should discuss the situation with your leader and Compliance and Ethics. In this scenario, accepting payment of the registration fee is unlikely to be a conflict of interest because the association is not a vendor or potential vendor of Noridian.

## INTERNAL GIFT GIVING

We generally discourage gift giving between associates and their direct and indirect leaders. While leaders may provide gifts to associates, they must avoid the appearance of favoritism. Company-approved items provided to recognize business achievements or as part of a Noridian-sponsored event are not considered gifts.

**Q: My teammates would like to throw a baby shower for our leader. Is this allowed?**

A: Yes. We discourage but do not prohibit occasional gifts, particularly on special occasions. We discourage gifts to leaders so that no one feels pressure to give them, and so that we avoid the appearance of a conflict of interest. A good idea would be for the team to buy the gift(s) on behalf of the entire team.

## CONTRACT BIDDING

**The federal Truth in Negotiations Act** requires us to certify that our cost and pricing data are “current, accurate, and complete.”

**Antitrust laws** require that we certify that we do not engage in anticompetitive practices. Federal antitrust laws are designed to promote fair competition and create a level playing field in both commercial and federal marketplaces. Anticompetitive activities are against the law. Additionally, we must not try to get confidential information about a competitor in an illegal way or a way that would require anyone to violate a contractual agreement, such as a confidentiality agreement or non-compete arrangement with a prior employer.

**The federal Procurement Integrity Act** applies to us because we bid on federal government contracts:

- We may not offer to discuss employment or business opportunities with government procurement officials.
- We may not seek confidential information from third parties, such as government bid selection criteria or a competitor’s bid or proposal information.



## AVOIDING ORGANIZATIONAL CONFLICTS OF INTEREST (OCIS)

Organizational Conflict of Interest (OCI) rules prohibit us from competing for work or providing services to the government if the company:

- would be unable to provide impartial assistance or advice;
- has an unfair competitive advantage because it set the ground rules for the competition; or
- has an unfair competitive advantage because it has unequal access to non-public information that is relevant to the competition.

Noridian does not accept work that creates an OCI or appearance of an OCI with other client work without first putting a government-approved mitigation plan into place.

## DEALING WITH EXCLUDED OR INELIGIBLE PERSONS

Federal and state government programs, including Medicare and Medicaid, prohibit us from contracting or doing business with any person or entity that is currently debarred, suspended, excluded, proposed for debarment or suspension, or otherwise declared ineligible by a federal program to perform work under any government contract or subcontract.

To comply with these requirements, we conduct background checks for all prospective employees. This includes searches of the following lists:

- Department of Health and Human Services Office of Inspector General's List of Excluded Individuals/Entities
- System for Award Management
- Office of Foreign Assets Control List of Specially Designated Nationals and Blocked Persons
- State exclusion lists

If an employee appears on one of these lists, we will promptly investigate and take appropriate action. If you know or suspect someone is excluded or ineligible, you should contact Compliance and Ethics immediately.

## SELF-REPORTING

We are required to report to the federal government whenever we have “credible evidence” of certain violations of federal law. Examples of things that must be reported would be:

- fraudulent conduct
- identified conflicts of interest
- gratuity violations

We must also report violations of the False Claims Act or if we receive a significant overpayment on a federal contract. There are certain disclosure rules for our state contracts as well.



Under our Medicare contracts, we must tell CMS whenever we discover a known, probable, or suspected Reportable Event. A Reportable Event is anything that involves the following:

- A matter that a reasonable person would consider a violation of criminal, civil, or administrative laws applicable to any Medicare contract or federal health care program; or
- Integrity violations, including any known, probable, or suspected violation of any Medicare contract term or provision.

Reportable Events may include activity that occurs at Noridian or, under certain circumstances, activity that involves third parties, such as Noridian subcontractors.

## **NOTICE TO EMPLOYEES CONCERNING WHISTLEBLOWER RIGHTS**

Noridian maintains a strict No Retaliation Policy. For example, any employee who, honestly and in good faith, reports a potential violation of law, authority, or contract or who cooperates with an investigation is protected from retaliation. There are also federal protections for whistleblowers (41 U.S.C. § 4712 and the Federal Acquisition Regulation). Noridian is required to provide you with information about these protections.

Employees are protected against discharge, demotion, and discrimination as a reprisal for disclosing information (except for classified information) that the employee reasonably believes is evidence of any of the following:

- A gross mismanagement of a federal contract or grant.
- A gross waste of federal funds.
- An abuse of authority relating to a federal contract or grant (where “abuse of authority” is defined as an “arbitrary and capricious exercise of authority that is inconsistent with the mission of the executive agency... or the successful performance of a [federal] contract or grant...”);
- A substantial and specific danger to public health or safety; or
- A violation of law, rule, or regulation related to a federal contract (including competition for or negotiation of a contract) or grant.

Employees are protected when they disclose these types of information to certain government persons or entities, such as the Department of Justice, a member of Congress, a court, or an Inspector General. They are also protected when they make a report to Noridian management or to those who are responsible to investigate misconduct.





## REPORTING TO A FEDERAL AGENCY

Whistleblowers who believe they were discriminated against for their disclosure of information may submit complaints to the Inspector General of the federal agency involved. Whistleblowers have up to three years after the date of the alleged discrimination to submit a complaint.

The Inspector General will generally perform an investigation. If the agency determines that discrimination has occurred, there are remedies that may be available, such as ordering a company to reinstate the employee, pay damages or pay costs associated with bringing forward the complaint. Noridian has the right to appeal any agency order to the relevant United States court.

# NORIDIAN

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