



Healthy Communities, Healthy Planet.

2022 Environmental, Social, and Governance Report



To Our Friends and Neighbors,

At WellSpan Health, we have long understood that creating healthy communities requires much more than providing quality health care. Creating healthy communities demands compassion, collaboration, innovation, and action. It requires leadership and strategic investment, and it compels our team – 20,000 strong – to work as one every day to fulfill our vision of A Trusted Partner. Reimagining Healthcare. Inspiring Health.

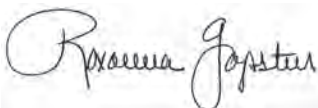
With our mission to improve health through exceptional care for all, lifelong wellness and healthy communities, we have consistently demonstrated WellSpan's commitment to the residents of south central Pennsylvania. In 2022, we took our commitment a step further by making sustainability an integral part of our efforts to become the region's leader in value and advance the triple aim of improving health, providing better care, and lowering costs for consumers. With this report, we are pleased to share a comprehensive overview of our environmental, social and governance (ESG) priorities and the progress we have made.

To effectively address the social, economic, behavioral, and environmental determinants that are responsible for 80% of health outcomes, we actively listen to members of our communities to better understand, identify, and remove barriers to care. We provide tools and resources to encourage healthy lifestyles and connect individuals to needed services and social support. Because we know we cannot do this work alone, we continually engage with other mission-driven organizations to identify and create opportunities to expand our reach, help more people, and collectively improve the health and wellbeing of the communities we serve.

We are proud of our accomplishments yet humbled by the enormity of the challenges and opportunities facing the healthcare industry, our communities, and our world. We are dedicated to this work for the long term, knowing that ESG progress is a journey of continuous improvement.

Our Path to 2030 provides the roadmap for sustainability actions across our system. It is not the path of least resistance; rather, it is a road we are eager to travel, knowing it will guide us to further reimagine healthcare and unlock value, leading to a better future for all of us.

Sincerely,



Roxanna Gapstur, PhD, RN
President & CEO



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WellSpan Environmental, Social, and Governance Report

Sustainability is central to WellSpan's vision to be A Trusted Partner, Reimagining Healthcare, Inspiring Health. As healthcare workers, we see every day how environmental factors create additional health threats to our communities. And we recognize our responsibility and obligation to society as a healthcare provider and major employer.

Our environmental stewardship, social priorities, and strong governance (ESG) are integrated into our strategy, culture, and operations. With the launch of WellSpan's Path to 2030 sustainability strategy in 2022, our work to elevate sustainable best practices across the system is helping us fulfill the triple aim of improving health, providing better care, and lowering costs for consumers.

We are prioritizing ESG investments in areas where they will have the greatest impact on the overall health of our communities, and we will continue to monitor and adjust as we make progress and learn.



ENVIRONMENTAL

- Purchasing & procurement
- Energy & water
- Conservation
- Waste management
- Greenhouse gas emissions



SOCIAL

- Health equity
- Accessible quality care
- Diversity, equity & inclusion
- Employee safety & well-being
- Employee communication
- Engagement & growth
- Community health & engagement



GOVERNANCE

- Ethics & compliance
- Data privacy
- Accountability
- Board diversity



About WellSpan Health

At WellSpan, we are dedicated to our mission of Working as One to improve health through exceptional care for all, lifelong wellness, and healthy communities, just as we are driven to achieve our vision of Trusted Partner. Reimagining Healthcare. Inspiring Health. **We hold ourselves to the highest standards of quality, safety, experience, and service in all that we do — and we are guided every day by our closely held values:**

01 // RESPECT FOR ALL

We are deeply committed to respecting everyone. In pursuit of true respect, we seek to better know and appreciate both each other and our patients. Through knowing people better we conduct ourselves with empathy and respect the diversity, rights and dignity of all regardless of race, gender, religion, ethnicity, sexual orientation, age, economic status, or personal circumstances.

02 // WORKING AS ONE

We work as one so our patients, consumers and communities can experience the benefit of WellSpan “working as one” with them and on their behalf. We work as one across professions, organizational boundaries, and communities by collaborating, coordinating, and sharing expertise, information, and resources — to better meet the needs of those we serve.

03 // ASSUME POSITIVE INTENT

As we seek to know one another and work as one we assume positive intent. We give people the benefit of the doubt and assume that they had positive intentions, identify the situational details, and get the bigger picture.

04 // DO THE RIGHT THING

We earn the trust and confidence of the individuals and communities that we serve by doing what’s right; acting with transparency and honesty; protecting patient confidentiality; paying special attention to vulnerable moments such as transitions in care; and meeting the letter and the spirit of all applicable laws, regulations and professional standards. Together – leadership, staff, and governance – are all committed to creating a culture that empowers everyone to do the right thing.

05 // FIND A BETTER WAY

We are relentless in our pursuit of discovering better ways to meet our mission and serve our communities. We take seriously our responsibility to be good stewards of the resources entrusted to our care. We are creative. We innovate, seek out and share best practices, focus on long-term sustainability and adopt ways of transforming the delivery of healthcare. We are steadfast in our commitment to continuously learning and improving both as individuals and as an organization.



We are on a transformational journey to become the region's leader in value – focused on the triple aim of improving health, providing better care, and lowering costs for consumers. Our strategy is designed to accelerate our transformation and growth as a preferred, high value, consumer-focused and clinically integrated system.



About WellSpan Health



Only locally governed health system in south central Pennsylvania



220 Patient Care Locations



20,000 Employees

08

Eight Respected Hospitals: WellSpan Chambersburg, WellSpan Ephrata, WellSpan Gettysburg, WellSpan Good Samaritan, WellSpan Philhaven, WellSpan Surgery & Rehabilitation Hospital, WellSpan Waynesboro, and WellSpan York Hospital

57 nonprofit community partner organizations

\$1.4 million in community grants

Forbes 100

Best Employers in Pennsylvania

More than \$541.7
million in combined
charitable,
uncompensated care

\$312+

Million In Community
Investments

Clinically integrated network with 2,600
physicians and advanced practice providers
(APPs), including more than 2,000 employed
physicians and APPs

Home to the region's
only accredited Level
1 Regional Resource
Trauma Center and
Comprehensive Stroke
Center



"We continuously invest in our team members, physicians, technologies, and partnerships to ensure that every member of the communities we serve has access to the highest quality of care for the communities we serve."

– Harvey Green, Senior Vice President and
Chief Development Officer

WellSpan Health Awards

When patients enter a WellSpan facility, we want them to know they will be receiving the highest quality care available. Recognition from credible organizations is a testament to the quality of care our teams provide, reassuring our patients they've come to the right place.

THE NATIONAL QUALITY FORUM AND THE JOINT COMMISSION

John M. Eisenberg Award for Patient Safety and Quality

AMERICAN HOSPITAL ASSOCIATION Quest for Quality Prize Finalist

PRESS GANEY Human Experience Pinnacle of Excellence Award – WellSpan Surgery and Rehabilitation Hospital

PRESS GANEY Human Experience Guardian of Excellence Award - WellSpan Gettysburg Hospital, WellSpan Surgery and Rehabilitation Hospital and WellSpan Waynesboro Hospital

HEALTHGRADES America's 100 Best Hospitals Award – WellSpan Chambersburg Hospital

HEALTHGRADES America's 250 Best Hospitals Award – WellSpan York Hospital

LEAPFROG Top General Hospital Award – WellSpan Gettysburg Hospital

U.S. NEWS & WORLD REPORT Best Hospitals for Maternity Care – WellSpan York Hospital and WellSpan Good Samaritan Hospital

LEAPFROG "A" Safety Rating - WellSpan Chambersburg Hospital, WellSpan Ephrata Community Hospital, WellSpan Gettysburg Hospital, WellSpan Good Samaritan Hospital, and WellSpan Waynesboro Hospital

CENTERS FOR MEDICARE AND MEDICAID Five-Star Quality Ranking - WellSpan Chambersburg Hospital, WellSpan Ephrata Community Hospital, WellSpan Good Samaritan Hospital, and WellSpan Waynesboro Hospital

U.S. NEWS & WORLD REPORT High-Performing Hospital - WellSpan Chambersburg Hospital, WellSpan Ephrata Community Hospital, WellSpan Good Samaritan Hospital, WellSpan Waynesboro Hospital, and WellSpan York Hospital



AMERICAN HEART ASSOCIATION Get With the Guidelines Award for Cardiovascular Care

AMERICA'S GREATEST WORKPLACES FOR DIVERSITY by Newsweek

AMERICA'S GREATEST WORKPLACES FOR WOMEN by Newsweek

HUMAN RIGHT CAMPAIGN'S HEALTHCARE EQUALITY INDEX LGBTQ HEALTHCARE EQUALITY TOP PERFORMER AWARD – WellSpan York Hospital

TOP FINALIST FOR THE BERNARD J. TYSON NATIONAL AWARD FOR EXCELLENCE IN PURSUIT OF HEALTHCARE EQUITY by The Joint Commission and Kaiser Permanente

MAGNET DESIGNATION at WellSpan Surgical and Rehabilitation Hospital

PATHWAY TO EXCELLENCE STATUS WellSpan Ephrata Community Hospital, WellSpan Gettysburg Hospital and WellSpan Good Samaritan Hospital

Environment



WellSpan is committed to implementing sustainable practices to reduce our environmental impact because we know environmental factors pose an increasing threat to the health of our communities. According to Practice Greenhealth, the nation's leading organization dedicated to environmental sustainability in healthcare, the U.S. healthcare sector is responsible for 8.5% of national greenhouse gas emissions, spending \$8.3 billion on energy annually, and generating more than 30 pounds of waste per hospital bed per day.

To improve the health of south central Pennsylvanians and our planet, our initial environmental priorities in our Path to 2030 sustainability strategy include: diversifying our supply chain; reducing energy, waste, and chemical use; and greening our clinical operations.

In addition to our robust internal initiatives, we have signed on to meaningful climate pledges to expand the impact of our sustainability commitment.



WellSpan is embracing a green mindset because we know that being more sustainable is critical to our organization's future – and to the health and wellbeing of the communities we serve. ”

- Keith Noll, Senior Vice President and
Chief Administrative Officer



Diversifying Our Supply Chain



LOCAL SUPPLIERS

To reduce WellSpan's environmental impact while strengthening our local economy, we are increasing our reliance on local suppliers, partnering with local food providers including Bell & Evans in Lebanon County – where we buy 110,000 pounds of organic chicken each year for our cafeterias and patient meals, and Wayne Nell & Sons Meats in Adams County – where we purchase 80,000 pounds of chicken and beef annually. We also partner with local dairy farmers and markets to provide food in our hospitals, facilities, and surgery centers, including The Butcher Shoppe, Leg Up Farms, and J-Mar Farms.



YORK CONNECTOR PARTNERSHIP

WellSpan is one of a small group of leading organizations participating in the York Connector partnership a place-based local sourcing initiative in which small, diverse local businesses have a direct opportunity to sell their goods and services to locally based anchor institutions. This effort is not just about buying local it's about developing local businesses for long-term economic impact and further supports our efforts to localize our supply chain and stimulate York's economy. WellSpan has the highest percentage of total local spend among participating organizations.



PURCHASING & PROCUREMENT CRITERIA

WellSpan has updated our purchasing and procurement criteria, adding factors like geography, diversity, and sustainability to our decision-making. We now evaluate requests for proposal based on total value versus price alone. We award points to local suppliers as well as suppliers whose products are sustainably sourced and/or produced. And, we have a new distribution agreement with a minority-owned specialty product distribution company which supplements our existing national distributor agreement. In calendar 2022, our year-over-year diversity spend grew by 9% to \$1.9 million.

\$1.9M
Diversity Spend

\$165K, 9%
Diversity Growth

CY 2021 vs. CY 2022 Allocated

“

As an organization, we are very focused on being exceptional stewards of our community's resources, and always looking for new ways to reduce costs and improve efficiency. ”



Victoria Diamond, MPA

Senior Vice President, Central Region

James Stuccio

Senior Vice President, East Region

Niki Hinckle

Senior Vice President, West Region

Reducing Energy, Waste, and Chemical Use



HYBRID VEHICLES

We are committed to turning our entire fleet of approximately 200 transfer vehicles into hybrid or electric vehicles. While this effort will take years to complete, we have purchased our first two hybrid vehicles and are continuing to map out the timetable for future purchases.



SOLAR ENERGY EXPANSION

Based on our success in leveraging green energy from the solar farm at the WellSpan Philhaven campus in Mount Gretna, we are acquiring that solar array and evaluating opportunities to expand with additional panels. The current system helps to power WellSpan Philhaven Hospital, in addition to providing support to the Mount Gretna power grid, benefitting residents of the area.



COURIER SERVICE EFFICIENCIES

We are working to improve inefficiencies in our courier service through routing optimization that will conserve both energy and expense. With the growth of the health system and expanded need to transport supplies, lab samples, and vaccines driven by the pandemic, WellSpan's use of courier services has doubled since 2019. The team is now focusing on reducing the frequency of pick-ups based on volume of services and using fewer "on demand" routes as opposed to scheduled routes. The current changes are estimated to reduce our courier's annual miles traveled by more than 72,000.

WellSpan Good Samaritan Hospital in Lebanon, PA earned the Practice Greenhealth 2022 Partner Recognition Award for its leadership in environmental sustainability.

As the first step in WellSpan Health's sustainability journey, WellSpan Good Samaritan completed a comprehensive sustainability baseline assessment and implemented environmental best practices including:

- Reducing regulated medical waste by establishing centralized bins and reusable sharps containers,
- Greening the operating room by moving to reusable hard cases for surgical kits, replacing disposable containers with a fluid management system, and reviewing kits annually to eliminate unnecessary supplies,
- And maintaining use of reusable privacy curtains rather than previously used disposable versions.



Greening Our Clinical Operations



CLIMATE PLEDGES

As part of our commitment to sustainability, WellSpan signed on to two significant industry pledges in 2022: the **U.S. Department of Health and Human Services Healthcare Sector Climate Pledge** and the **Health Care Without Harm Climate Challenge**, which includes a commitment to reduce greenhouse gas emissions by 50% by 2030.

In addition to these national pledges, WellSpan has joined The Hospital and Healthsystem Association of Pennsylvania Good Food, Healthy Hospitals initiative, and is working toward Gold LEED Certification for the WellSpan York Hospital expansion project which is currently in the design phase.

WASTE MANAGEMENT IN THE OPERATING ROOM

In addition to our ongoing recycling program, we are working to green the operating room (OR) with a goal to impact all ORs across the system by June 2023. This process includes:

- The adoption of centralized bins and reusable sharps containers
- Reusable hard cases for surgical kits
- Replacement of disposable containers with a fluid management system
- Annual kit review to eliminate unnecessary supplies
- The reprocessing of single-use disposable medical devices
- Reduction in the carbon footprint created by anesthesia gas
- The recycling of clinical plastics where appropriate

A select group of leaders is supporting the design and implementation efforts in the OR along with the Surgical Service.



CHEMICAL WASTE REDUCTION

The operating room team also is evaluating the opportunity to reduce the use of – and potentially recycle – sterile surgical wrap. WellSpan uses 36,000 pounds per year of blue wrap, made from a plastic called polypropylene, used to maintain the sterility of surgical instruments prior to use in the operating room. The U.S. Environmental Protection Agency estimates blue wrap accounts for 19% of all operating room waste – making it an important target for our efforts to reduce chemical waste.



SYSTEM RECYCLING

Our Environmental Services team organizes and guides our WellSpan systemwide recycling program established in 2022. In the first month following the launch of the program in all our acute care hospitals, WellSpan recorded a 15% increase in recycling.

Social



As a not-for-profit, integrated health system with a mission of Working as One to improve health through exceptional care for all, lifelong wellness and healthy communities, WellSpan has a decades-long record of focusing on individual and societal wellbeing. We take seriously our responsibility to our stakeholders, patients, team members, suppliers, and our community. And are tireless in our efforts to prioritize initiatives with a sustainable positive social impact, including:

- Accessible quality care
- Diversity, equity and inclusion
- Team member health, safety and wellbeing
- Team member communication, engagement and growth
- Community health and engagement



ACCESSIBLE QUALITY CARE

Measurably improving the overall health of an individual, or population – and supporting them so they may enjoy personal lifelong wellness – is at the heart of what we do. Yet, for many people, access to affordable, quality care is a significant challenge. So in 2020, as we embarked on our WellSpan 2025 strategy, we embraced innovation as a core tenet to drive our growth and improve access, affordability and the patient experience for south central Pennsylvania residents.



Safety and quality go hand in hand as foundational to our vision of being a trusted partner. We are continuously looking to find a better way and consistently provide the safest, highest quality care to every patient. ”

- Tony Aquilina, D.O., Executive Vice President and Chief Physician Executive





AFFORDABILITY

For most Americans, healthcare pricing is, at best, a financial mystery, and, at worst, a serious obstacle to care prevention and treatment. Unlike most other products and services, healthcare treatments aren't viewed by consumers as "shoppable." WellSpan understands that in a value-based world, cost transparency and affordability are essential to earning patient trust and loyalty.

In 2020, WellSpan reimagined the patient financial journey and launched a web-based price estimator tool, enabling our patients and consumers to know the cost of treatment before committing to care. We also partnered to create an integrated billing experience that uses artificial intelligence to analyze large data sets and customize a payment plan for each patient. In 2022, we shared more than 40,000 pre-procedure estimates to consumers seeking treatment using our price estimator, and more than 91,000 WellSpan patients now receive customized payment plans.

We are proud of the steps we have taken to improve patients' understanding of their healthcare costs. Consumers' expectations for pricing visibility and affordability will continue to grow, and WellSpan will continue to innovate to deliver value.



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WellSpan is taking bold steps to make quality care more accessible, convenient and affordable – all with a great experience. ”

- Laura Buczkowski, Executive Vice President & Chief Financial Officer



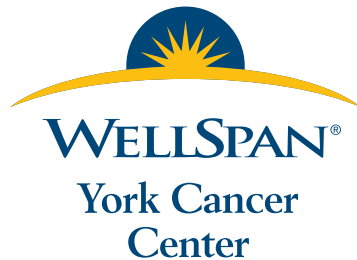
EXPANDED CLINICAL CAPABILITIES AND SERVICE OFFERINGS

Innovation has been foundational to WellSpan's effort to increase consumer access to care across our three regions. By asking "what if?" and collaborating with thoughtfully selected strategic partners, we have expanded our clinical capabilities and service offerings in existing and new geographies, enabling more unique patients to find, use, and stay in the WellSpan network for care.

Since 2020, we have added more than 150 new physicians and APPs to our medical group. We partnered with Capital BlueCross to launch two co-branded Capital BlueCross Connect wellness centers – in Chambersburg and York – that offer one-on-one consultations for health plan choices and access to a health coach or biometric screenings. We also have developed partnerships in two 55-plus communities located in Gettysburg and Mont Alto to provide on-site health and wellness benefits.

WellSpan has also improved access to care through dramatic growth in digital offerings. We offer a suite of phone, online, and virtual care options including primary care, urgent care, maternity care, cardiac rehab, behavioral health, home care, and other specialty care services. Additionally, we offer Duo Health, an option for subscription primary care, available as a direct-to-employer offering.

Partnerships



Fighting Cancer Together

In addition, WellSpan has built and strengthened partnerships with renowned organizations that provide access to treatments close to home for patients who need critical specialty care. Through our collaboration with the Johns Hopkins Sidney Kimmel Cancer Center, WellSpan clinicians have access to second opinions from Hopkins sub-specialists, an expanded clinical research network, improved genomics capabilities, clinical protocols, quality review, and participation in Hopkins tumor conferences, and multidisciplinary rounds – all of which directly benefit our patients. Similarly, our partnership with University of Maryland Heart Care enables seamless transitions for patients needing heart transplants.



The partnerships we create allow us additional opportunities to expand our reach into our communities and continually enhance the exceptional care and services we offer our patients.



- Geoffrey Nicholson, MD, Senior Vice President and Chief Clinical Officer, Population Health



WellSpan also is advancing equitable care for all through innovative programs such as:

- A collaboration with Rite Aid's retail pharmacy network, which has 45 locations in WellSpan's service areas to improve access to care, close care gaps, and strengthen medication adherence by ensuring patients are able to pick up their medicines and take them correctly.

Experience



Closely connected to WellSpan's commitment to improving patient affordability and access to care is our focus on delivering a more personalized patient experience. That starts with a consumer's first interaction with us and ultimately contributes to improved health outcomes.

Maintaining a patient-centric perspective is what led us to invest in optimization of the MyWellSpan patient portal. This web-based portal puts more control in the hands of our patients and consumers, enabling them to schedule appointments, access their records, connect with their care teams – all from the convenience of their computer, smartphone, or tablet.



“

Patient experience at WellSpan is much more than providing great care and convenient access. It's the compassion, empathy, and understanding we commit to the relationships we make with every patient. ”

- Megan Lecas, Senior Vice President, Service Lines



- David Vega, MD, Senior Vice President, WellSpan Health and Chief Medical Officer, WellSpan Medical Group

START

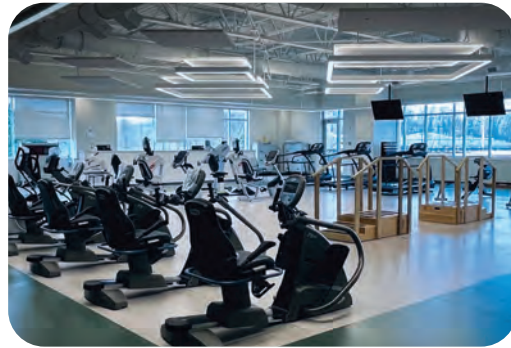
SPECIALIZED TREATMENT AND RECOVERY TEAM

START is a clinic that provides a comprehensive range of services to individuals experiencing urgent mental health and addiction needs. **START** has two overarching principles: to provide faster access to treatment and to stabilize acute needs. Offerings include psychiatry and therapy services, substance use screenings, increased screenings for food and housing insecurity, and referrals to support services. **START** uses evidence-based approaches to care, such as cognitive behavioral therapy, motivational interviewing, and medication-assisted treatment for substance use disorders. Importantly, the program operates as an integrated team to help the participant, whether through services we provide internally or via one of our many community partners.



Every patient has different care needs and comfort levels about where and with whom they receive the specific services they need, especially when the care involves behavioral health. By understanding what is important to each patient and showing we care, we can build an alliance that can help our patients achieve their goals. WellSpan takes very seriously the privacy of our patients and provides services in various types of settings to ensure comfort, security, and guarantee an ideal experience.

5 Diamonds



WellSpan was recognized as the first organization in the world to achieve 5 Diamonds designation. Earning a diamond is a significant achievement and reflects the team's dedication to activate all key features and digital capabilities, like paperless statements, to life for our patients through Epic — our electronic health partner.



“

We encourage our teams to find new and better ways to improve every patient's journey and empower them to transform the possibilities into meaningful experiences.”

- Hal Baker, MD, Senior Vice President and Chief Digital Information Officer

Cardiology



We focused on creating a consistent, reliable patient experience through investments that reduce clinical variation and improve care coordination. Consistent delivery of an exceptional experience was in the design of our new, state-of-the-art Heart and Vascular Center in York. It's the direct result of continually asking ourselves, "What If..?"

WellSpan is proud and fortunate to be home to some of the nation's top cardiologists. Our new Heart and Vascular Center provides optimal space for our teams to deliver outstanding coordinated patient care. Our cardiologists are teaching advanced surgical procedures to physicians at top hospitals across the nation, saving lives far beyond south central Pennsylvania.

The relentless focus on our patients has led to care delivery innovations that benefit patients by lowering their costs, improving access, and increasing their comfort which all result in better outcomes. For example, WellSpan Hospital at Home enables us to deliver acute care and treatment for some illnesses previously requiring hospitalization right in the home.

Additionally, we've noted success by integrating automated intelligence in all five of our sleep centers, more than 66% of sleep studies are now done at home. WellSpan has become a top provider of home sleep studies and significantly improved the patient experience.

Diversity, Equity and Inclusion



Providing exceptional care begins with our value of Respect for All, contributing to an organization that welcomes and respects individuals' differences. We strive to understand and appreciate each other, including all the attributes we have in common and those that make us unique. We celebrate the diversity of our lived experiences to advance our inclusive culture, so everyone who works or seeks care at WellSpan feels they belong. We gain strength when our diverse team is empowered to serve our diverse community.



WELLS
EMILY
RN
REGISTERED NURSE

Emily, RN
Nurse

VELIS
HEALTH

Increased Team Member Diversity

WellSpan's commitment to building and sustaining a diverse team population starts with senior leadership's belief that diversity is a true competitive advantage. As a result, we have prioritized initiatives and deliberately invested in efforts to increase diverse representation throughout our organization, which include:

- Conducting our first Culture of Belonging survey in the fall of 2020 and a subsequent survey in the fall of 2022, which are informing our actions to improve inclusion.
- Forming a Diversity, Equity and Inclusion Steering Committee, comprised of a highly diverse group of team members from across the organization, with WellSpan's Chief Executive Officer and Chief Human Resources Officer as executive sponsors.
- Engaging a Diversity, Equity and Inclusion consultant to help WellSpan create and sustain a diverse and inclusive culture.
- Launching unconscious bias conversations with team members and encouraging them to take an implicit bias test offered through Harvard's Project Implicit.
- Undertaking a comprehensive review of key policies which resulted in revising our Patient Rights and Responsibilities Policy to reinforce our commitment to a diverse workforce.
- Creating an ALIGN situation aid to standardize our response and support our team in navigating potentially biased patient requests, ensuring every WellSpan team member who serves patients directly receives a copy.
- Reviewing our leadership pay practices to ensure equity across gender, race, ethnicity.
- Reimagining our WellSpan Leadership Academy, a mentoring program designed to lift up high-potential diverse leaders. Our 2023 class includes 12 racially diverse high potential leaders out of the total cohort of 43.
- Creating a Diversity, Equity and Inclusion Equal Opportunity Policy.
- Designing and implementing a new Inclusive Recruitment Policy and Diverse Recruiting Training for leaders, which requires all hiring managers make good faith efforts to include candidates of racially diverse backgrounds for all job openings before interviews begin.



While we recognize we have more work to do, we are proud of the progress we have made through our deliberate focus on increasing the number of gender and racially diverse executives across our system. Of our 18 system senior vice presidents, eight (44%) are female, including two of our three regional senior vice presidents. Seventy percent of leaders at the director level and above are female. In addition, we have more than doubled the racial diversity of our executive leadership team since 2019 from 8% to 17% through intentional recruitment efforts and internal promotions.

As a further testament to our commitment and progress, WellSpan Health was named by Newsweek in early 2023 as one of America's Greatest Workplaces for Diversity and one of America's Greatest Workplaces for Women, using a rigorous three-part evaluation, including surveys of HR professionals and employees and an independent study of more than 350,000 company reviews. In 2022, WellSpan York Hospital earned the Human Right Campaign's Healthcare Equality Index LGBTQ Healthcare Equality Top Performer award.

Inclusive Culture



In addition to increasing team diversity, we are dedicated to creating an inclusive environment for all, with a goal to become one of the most inclusive organizations in healthcare.

In support of this work, WellSpan created an Inclusion Champions Program, a network of WellSpan team members trained to drive inclusion and improve belonging by learning and educating others, disrupting bias and discrimination when they see it, promoting equity, and being unapologetic allies. In Fall 2022, we trained approximately 150 Inclusion Champions as part of our inaugural network, and we will host our second training program for additional team members interested in becoming champions beginning in September 2023. The program enables a larger number of team members to actively advance a culture of belonging, so everyone feels respected, is treated fairly, and has an opportunity to excel.

In February 2023, we were very proud to learn that our Inclusion Champion training program was recognized with an Outstanding Training Initiative award from Training Magazine, one of only five award recipients. In addition, our Organizational Learning & Development team was recognized by Training Magazine as the 16th top training organization in the country and #1 in the healthcare delivery space.

Continuing DEI Commitment

To achieve and sustain recognition as a leader in diversity, equity, and inclusion, WellSpan has incorporated initiatives and programs into a thoughtful and evolving strategy for 2023 that is supported by the highest levels of WellSpan leadership:

- WellSpan is the first healthcare system in Pennsylvania to host a youth summit in partnership with the Black Men In White Coats organization to encourage students from historically marginalized groups to consider healthcare careers.
- We will offer our inaugural Summer Internship for Students Underrepresented in Medicine in summer 2023. Our goal is to provide motivated preclinical medical students, or rising MS-2, with in-depth exposure to clinical medicine early in their medical school education.
- We elevate diverse stories for shared learning and programming in our annual observances such as Hispanic Heritage Month, Black History Month, Celebrate Diversity Month, PRIDE Month, and Veteran's Day, based on co-created content from the lived experiences of self-identifying diverse team members.
- We are taking steps to earn Human Rights Commission's LGBTQ Healthcare Equality Index designation for every WellSpan hospital. WellSpan York Hospital earned this award in 2022.
- As one of ten healthcare organizations selected to participate in the Institute for Healthcare Improvement Pursuing Equity Action Community Team, we are actively engaged in fulfilling our program responsibilities.

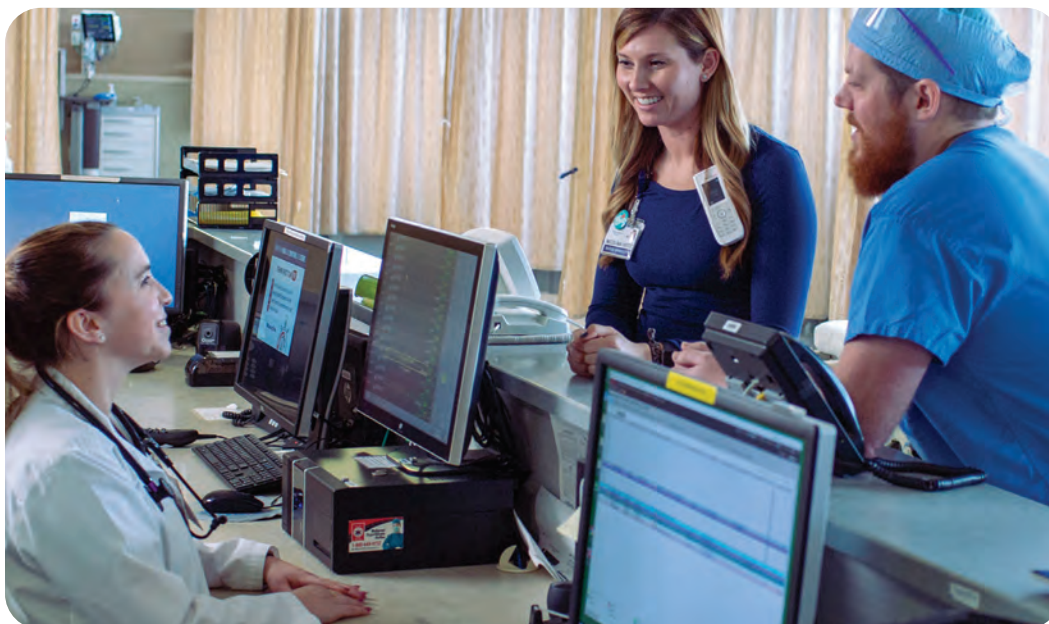


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Building a diverse, equitable, and inclusive culture is born from our WellSpan values, and powered by our pursuit to provide the safest, highest quality healthcare at the most affordable cost. The data doesn't lie. Diverse and inclusive organizations are more innovative, recruit the best talent, outperform their competitors, and enable their team members to grow with the organization. This is our strategic imperative. ”

- Kim Brister, MBA, Vice President and Chief Diversity, Equity and Inclusion Officer

Employee Safety



In a challenging labor market, exacerbated by a pandemic that stretched healthcare teams to their limits, WellSpan is working to ensure our team members are thriving even as the very nature of work is rapidly changing. In an environment where the experience of work is increasingly individualized, it is incumbent on leaders to create a workplace where every team member can be their best. Our leaders understand the importance of actively recognizing our team members, supporting them in times of need, and helping them learn, grow, and thrive at WellSpan.

SAFETY

As a provider of healthcare, our first priority is safety. Patients expect to be safe in our care. The same is true of team members – being safe at work is the foundation of providing great care.

Creating an atmosphere where team members want to work starts with psychological safety. Psychological safety is a belief, among our team and shared by our patients, that we can ask questions, voice concerns, offer ideas, and provide constructive feedback to one another without fear of punishment or negative consequence.



At WellSpan, we are committed to sustaining a workplace grounded in psychological safety – an environment that sustains value-inspired, evidence-based, high-quality patient-centered healthcare. Psychological safety at WellSpan is about every team member and every patient feeling safe and respected every day. It's about accountability, inclusion, and respect.

We recognize that we are responsible for creating – and maintaining – this environment. By living our WellSpan values, we make psychological safety possible. Respect for All, Working as One, Assume Positive Intent, Do the Right Thing, and Find a Better Way are all pathways to a safe and inclusive environment.

Psychological safety is essential to our ability to fulfill our mission and vision. At WellSpan, psychological safety makes exceptional human experiences possible.



In support of a Just Culture, where everyone feels psychologically safe, we are committed to numerous initiatives, including:

- **Tiered huddles:** Our daily huddles are improving quality across our system by empowering teams at all levels by escalating the most critical issues in real-time. Through huddles, we stay continuously aware of processes and performance. Huddles provide situational awareness for team members from the exam room to the operating room, or even the front desk.
- **Heads up, Speak up program:** Through this recognition program, we routinely reinforce the importance of all team members sharing concerning information with their leader or another team member to make WellSpan safer. Recognition forms are available at all locations, keeping safety top of mind and making it easy for team members to recognize each other's efforts.
- **Improved internal safety reporting:** We've made many improvements to our internal safety reporting system by implementing real time problem solving. This has resulted in front line team members more quickly identifying the root cause of safety issues and taking action to prevent safety issues from occurring again. These insights form the foundation of robust quality improvement work across the health system and reducing the number of serious safety events.



- **Real-Time Problem-Solving:** The Real-Time Problem-Solving model provides the structure to create foundational direction for teams to solve problems in real time, reaching the root cause of an issue. Encouraging team members to use the scientific method with practical problem-solving tools promotes real-time assistance through a structured help chain. This model requires a culture of urgency, flexibility, sharing, and full transparency.
- **System improvement report outs:** Monthly, we offer all team members a virtual venue to share, celebrate, and educate each other on the improvement work happening across WellSpan. Team members report out on projects in their area, what they learned, lessons learned, what went wrong, and how they will move forward. Presenting teams are celebrated for their efforts and those in attendance are encouraged to consider how they can apply what they learn to their own areas.



“

We know that a safe environment for team members, patients, and families is imperative to the delivery of quality care – and we continuously work to raise the bar on safety across our system. ”

- Kasey Paulus, RN, Senior Vice President & Chief Nursing Executive

Employee Health and Well-Being



Our robust offering of tools and benefits in support of total well-being is wide-ranging, going far beyond base pay and medical benefits. Our ongoing commitment to providing best-in-class benefits to our team members and their families is a central component of Total Rewards platform – and an important foundation for attracting and retaining talent.



“

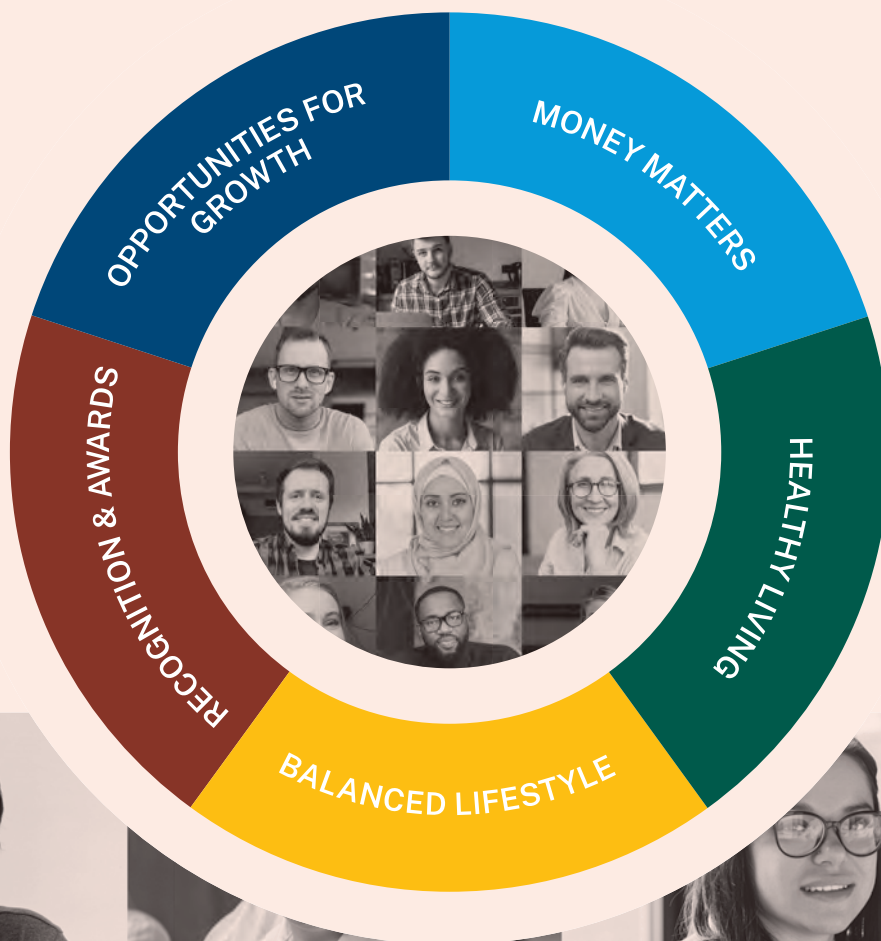
WellSpan heavily invests in our entire team. From our exceptional total rewards program to career support and well-being resources, we're committed to helping our team members grow both personally and professionally.

”

- Bob Batory, Senior Vice President and Chief Human Resources Officer

Benefits: My Total Rewards

Our Total Rewards focus areas are designed to support our teams in their career and life journeys.



Benefits



Our health and wellness benefits have long been the centerpiece of our team member value proposition. With our benefit improvements for team members in 2023, we continue to lead the market – in terms of coverage quality and cost and breadth of benefits options. And, we are continuously evaluating and making improvements based on team member feedback. This year we enhanced our fertility treatment benefit and added an adoption benefit. These offerings enrich our family-friendly benefits already in place in the areas of maternity, paternity, adoption and foster care leave. Plus we also have also enhanced our vision coverage for contact lenses and frames.



WellSpan is firmly focused on team member mental and emotional wellbeing as demonstrated by the following offerings:

- Through a joint effort among WellSpan Philhaven, our Human Resources team and our Employee Assistance Program (EAP), we offer **individual and group support** to our team members and providers, with a special focus on caregivers.
- Our expanded **Wellbeing Council** regularly meets to address current and future needs of teams and providers, above and beyond the foundational curriculum that is focused on wellbeing and resilience to help team members practice healthy habits.
- **Remote or hybrid work schedules** are also available for certain roles. Remote work has given WellSpan the benefit of a much larger talent pool. To enhance professional development, create career opportunities, and improve WellSpan team member wellbeing – wherever they may live – WellSpan has leveraged our “find a better way” value, developing innovative ways to stay connected.
- Our innovative **WellStaffed Nurse Program**, which has received national attention, increases workforce flexibility, expands the talent pipeline, and reduces our use of agency nurses. Through this program, participating WellSpan nurses rotate across sites on multi-week assignments, giving them more varied career experiences. Because the program has been so successful, we are considering expansion to other clinical specialties.

Team Member Communication, Engagement and Growth



EDUCATION, TOOLS AND RESOURCES

Because we know money matters we offer innovative ways to support our team members' financial wellbeing. It is our philosophy to not only pay market-rate compensation but to financially empower our team members with education, tools, and resources. Our Daily Pay program allows team members to receive compensation they've earned before pay day. This compensation option helps team members avoid pay day loans by not having to wait until pay day to receive compensation they've already earned.

From a tuition reimbursement perspective, WellSpan is proud to offer financial assistance to qualifying team members who choose to take educational or technical training courses which satisfy requirements for degree, certification, or registry that is required for employment in a specific position with WellSpan. In 2022, our tuition reimbursement investment was more than \$4 million for more than 1,400 team members.



Group Talk



Phone Call



Huddles



Emails



Survey



Podcast

COMMUNICATION & RECOGNITION

At WellSpan, we place a high value on clear and consistent communication to keep our team of 20,000 aligned, informed, and engaged. A disciplined and strategic two-way communication approach, driven by our CEO and leadership team, ensures information flows to and from all levels of the health system. Key channels include:

- Executive rounding – where our CEO and other leaders engage teams – listening and learning to help create the optimal environment for patient care and team member wellbeing
- Tiered daily huddles provide situational awareness for teams at every level, from the exam room to the operating room to the front desk
- A weekly call with the CEO and 1,700 leaders across the system to share timely information
- Regular team member pulse surveys and focus groups to gather feedback and ideas
- A monthly email message on topics relevant to the entire team
- Tri-annual meetings with our top 1,700 leaders to discuss annual strategic and operational priorities and progress in the context of our five-year plan
- Inspiring Health, a twice-monthly podcast created for WellSpan team members and the public that tracks our journey to delivering the highest quality care and the best experience, at the lowest cost



We also make recognition a priority through several platforms that celebrate team member achievements across the system:

- Our digital Recognize platform gives team members the opportunity to recognize each other for big and small accomplishments, day in and day out.
- For two weeks in the fall, we host our Thankful & Grateful program, during which team members are invited to use the “Thankful & Grateful” badge on the Recognize platform to recognize an individual or team for outstanding performance.
- Every August, we celebrate 30 Days of Fun, offering systemwide events and fun activities that take place within individual departments to award our team’s performance.



“

Recognizing, celebrating, and supporting our team – including giving special attention to their wellbeing, is integral to the WellSpan experience. By clearly communicating expectations and providing useful tools, we enable leaders to communicate effectively with their teams, driving alignment across the system.

”

- Cindy Fruitrail, Senior Vice President & Chief of Staff

Team Member Growth and Development



We know that investing in our team through development conversations and educational opportunities is critical to meeting our talent pipeline needs and fulfilling our mission. We believe that providing an outstanding team member experience fuels an outstanding experience for those we serve.

As part of regular rounding, supervisors are expected to build in time for discussion about professional development and career aspirations, linking their team members to the right resources to support their goals.

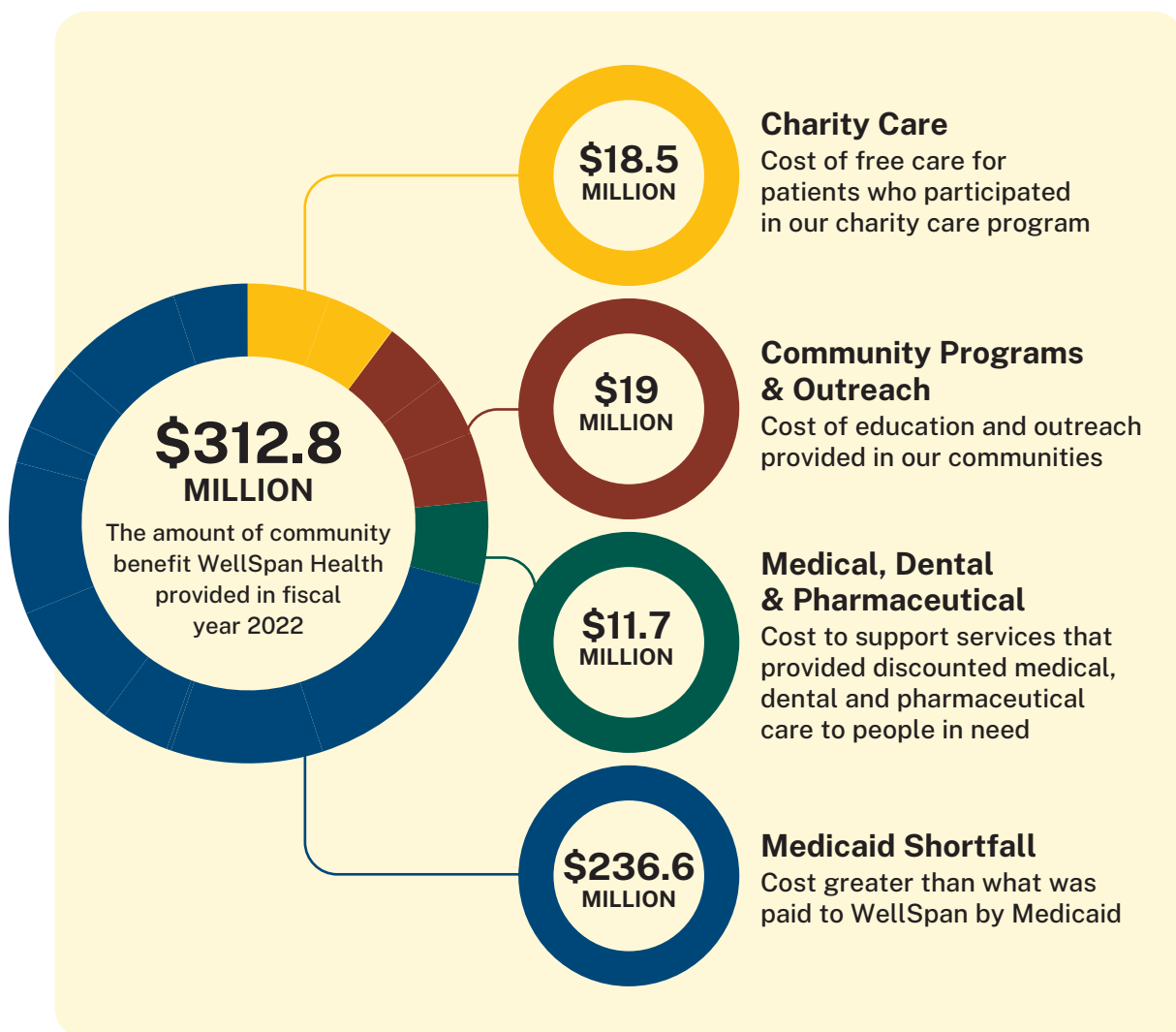
Development Opportunities

DEVELOPMENT OPPORTUNITIES FOR WELLSPAN TEAM MEMBERS

- Our leader curriculum includes a new leader community that meets on a quarterly basis to help new leaders get acclimated to their new role and WellSpan culture, and to provide them with a network of support. These efforts support our onboarding, development, and retention efforts.
- Our leadership class offerings are designed to enhance leader skills, making WellSpan leaders more agile in our dynamic environment. Lessons in resiliency, emotional intelligence, and psychological safety equip our leaders to better support their teams.
- MyLeadWell is a “just in time” platform that serves as a developmental resource hub for all team members.
- Our new leadership development community on Yammer provides rich opportunities for peer connection and learning.
- Casual Connections sessions further enhance team member development and success. These one-hour sessions create opportunities for team members to learn from one another. Topics are selected by WellSpan team members, and sessions are built to foster cross-functional interaction, promote professional development, and assist in creating a space to give and receive useful feedback. Since the program began in January 2022, we have facilitated 46 sessions with more than 2,200 participants.
- Our Learning Management System provides a wide range of independent learning opportunities. Featuring a home page with the question “What do you want to learn today?” team members are encouraged to explore topics of interest to their role and/or career goals.
- Leadership Academy, a diverse representation of high-potential clinical and non-clinical leaders at WellSpan, helps build our executive bench by offering participants opportunities to directly interact with WellSpan executives, experience immersive learning opportunities, and prepare a capstone project. The academy also creates opportunity for underrepresented minority leaders for any type of leadership role in the organization.



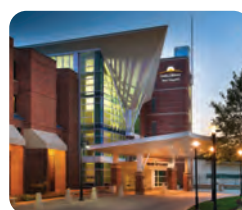
Community Health and Engagement



“

Healthy communities are strong communities, which is why WellSpan is committed to partnering with local organizations to drive meaningful change and develop leading-edge practices and continuous improvement measures to advance the future of health care. ”

- Michael Seim, MD, Senior Vice President and Chief Quality Officer



Community partnerships are key to WellSpan's mission of Working as One to improve health through exceptional care for all, lifelong wellness and healthy communities.

The overall community benefit provided by WellSpan for fiscal year 2022 totaled more than \$312 million, including programs and outreach, charity care, unreimbursed Medicaid costs, and supplemental medical, dental, and pharmaceutical services.

In coordination with our many partners, nearly 600 women received vital breast cancer screenings via WellSpan's Mobile Mammography coach in community-based locations throughout our region. Through grant funding, targeted outreach and other support, uninsured patients and underserved populations were able to obtain mammography screenings.

In addition, WellSpan conducted more than 350,000 screenings to identify more than 21,000 patients with food insecurity. Within the past three years, we invested nearly \$575,000 to support our community partners in addressing hunger for our patients and others who need help.

Our vital local partnerships with federally qualified health centers create a strong safety net of health care services to help meet the health needs of so many of our underserved populations.



WellSpan is committed to endeavors that improve the health of the communities and people we serve. To bring that commitment to life, WellSpan's Community Grants Program provides direct funding for health-related community activities in our neighborhoods. In fiscal year 2022 both the WellSpan Community Health Fund and Summit Endowment enabled us to partner with 57 nonprofit community organizations and provide \$1.4 million in community grants, increasing access to care for those in need.

Acting on the 2022 Community Health Needs Assessment, we worked with many partners to design our three-year Community Health Improvement Plan to address social determinants of health and access to care. We value the community partnerships and support that make it possible for WellSpan to be a trusted partner, reimagining healthcare and inspiring health for our families, friends and neighbors.

GOVERNANCE

As the only locally governed health system in south central Pennsylvania, WellSpan Health is uniquely invested in the communities we serve and driven to bring our charitable mission to life through deep community connections and robust systems of care. In 2019-2020, a WellSpan task force comprised of then-current board members and with the help of an outside governance expert, undertook a comprehensive review of our health system's governance structure and made recommendations for significant changes. In 2020, these recommendations were adopted and WellSpan implemented a new streamlined governance structure designed to support the mission, vision, values, and strategic objectives of the WellSpan system and in keeping with governance best practices.



We take a thoughtful, strategic approach to governance to ensure WellSpan is positioned for continued strong connections with local communities, moving us a step closer to our vision of Trusted Partner, Reimagining Healthcare, Inspiring Health.



- Hilda Shirk, Board Chair



ETHICS AND COMPLIANCE

To comply with all legal and regulatory obligations – and maintain high standards of clinical quality and safety for patients and staff, WellSpan and our affiliates adhere to all applicable rules and regulations established by federal, state, and local agencies with jurisdiction, as well as applicable standards established by accreditation organizations. We maintain a disciplined seven step closed-loop compliance approach that includes:

- Oversight
- Due diligence and risk assessment
- Standards and procedures
- Education
- Reporting and investigation
- Corrective action
- Monitoring and auditing

Our program is overseen by a Chief Compliance Officer who reports to the Audit & Compliance Committee of the board. We perform background checks on all new employees and sanction checks on vendors and providers with privileges at our facilities. Our Compliance Risk Assessment Team meets monthly to discuss, review and assess compliance risks.



As a 'Just Culture' organization, our diligent management of compliance and conduct standards allows us to effectively prevent problems and fairly resolve issues.



- Amy Nelson, Senior Vice President and General Counsel



Our Code of Conduct, which instructs and requires every team member to comply with applicable laws, engage in ethical and safe conduct, avoid conflicts of interest, and conduct business with integrity. This Code is provided to all team members upon hire and annually thereafter with a requirement to acknowledge and attest to abide by the letter and spirit of the Code. In addition, all team members are required to complete compliance education and training modules annually and at various intervals. Team member performance reviews include an explicit ethics factor which evaluates individual performance of duties with integrity, respect, and a commitment to do the right thing.

WellSpan provides a confidential Compliance Reporting phone line and an online application that employees can use to report suspected unethical or illegal behaviors and ask compliance questions. Management shares significant compliance investigations with the Audit & Compliance Committee.

As further evidence of our commitment to accountability and strong governance practices, we apply corrective action using principles of fairness and consistency and make systematic changes, as warranted, that are grounded in principles of Just Culture and Lean Management. Just Culture recognizes that mistakes are generally due to a combination of flaws in organizational systems and individual behaviors, resulting in shared accountability and requiring a fair and just response. Our Lean Management system is the way we continuously improve our work at WellSpan Health. It relies on psychological safety to infuse trust and respect into our culture and interactions – identifying the root cause of problems and developing collaborative solutions.

BOARD DIVERSITY

Board diversity has been a top priority with appointments based on ensuring the appropriate mix of member competencies to further the system's strategic objectives. The Board has set goals to create a diverse board in terms of race, sex, age, and experience/knowledge. Board membership is reviewed and updated annually.



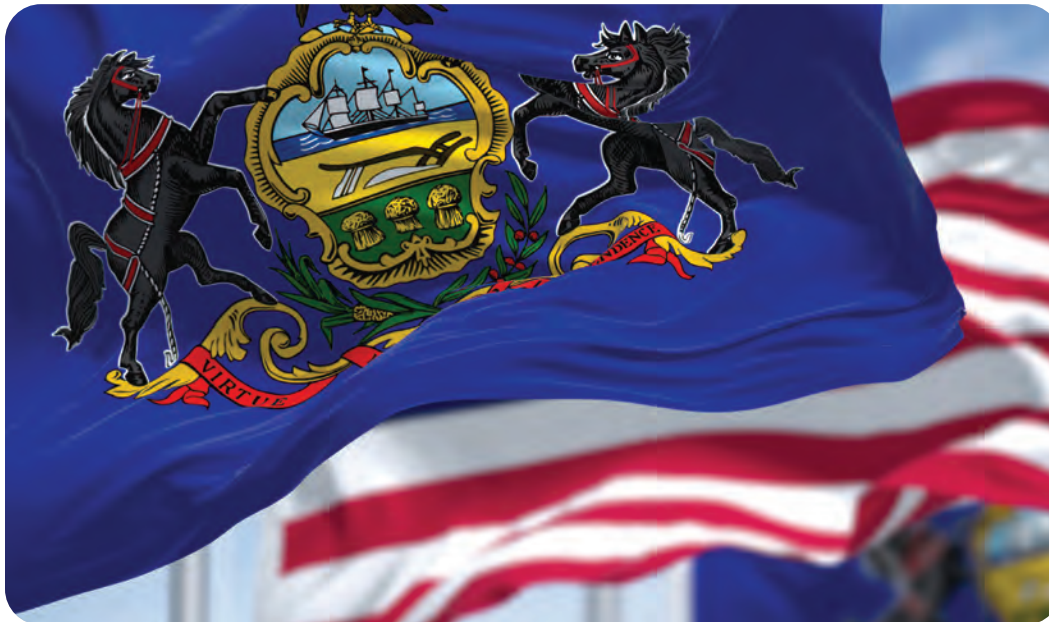
DATA PRIVACY

WellSpan respects team member and patient privacy, and we are committed to protecting it. Our Privacy Policy explains our collection, use, and disclosure of information collected through WellSpan owned websites, co-branded websites, mobile applications and mobile optimized websites.

In addition, WellSpan notifies patients of suspected unethical or illegal behaviors and WellSpan's privacy practices by distributing the Notice of Privacy Practices upon the patient's first service delivery date on or after implementation of the policy. WellSpan entities document the patient's acknowledgement of receipt of the Notice of Privacy Practices or good faith efforts to obtain an acknowledgement. The acknowledgement forms are permanently retained in an administrative section of the patient's medical record or an alternative filing mechanism as deemed appropriate by the WellSpan Privacy Officer.

Notice of Privacy Practices are positioned in patient registration areas, clinical sites, and the Wellspan website.

Using the principles of information governance, WellSpan maintains a Privacy Program that continually and increasingly treats privacy as a significant indicator of our organization's health and reports on its status, effectiveness, and quality to maintain and build upon the trust patients, team members, businesses, and others have in WellSpan as the provider of choice.



ACCOUNTABILITY & STAKEHOLDER ENGAGEMENT

The WellSpan Health System Board meets six times per year, and an authority matrix guides decision-making through clearly articulated board and management accountabilities. The standing committees of the system board include: Executive, Governance, Audit and Compliance, Compensation, Finance, and Quality. Committee charters outline the scope and responsibility of each.

In addition, we operate three regional hospital boards – West, Central and East – that provide local focus on clinical quality, safety, and medical staff credentialing. Each regional hospital board is comprised of 13-15 members and supported by the region's senior vice president and the system's Chief Quality Officer. There are no standing committees connected to these boards other than site-specific credentialing committees as needed.

Our WellSpan Population Health Services Board serves in accordance with the governance requirements of the Centers for Medicare and Medicaid Services accountable care program participation. And, our WellSpan Medical Group Board ensures that WellSpan employed providers deliver high-quality, high-value health care services.

We also maintain five Foundation Boards which remain an important connection to our local communities, guiding our philanthropy and community benefit work.

Our Board members – and executive leadership team – are committed to stakeholder engagement. Through active involvement in local events, partnerships with organizations in our region to address health inequities and other issues, and clear frequent communication with team members, donors, and suppliers, we continue to build and maintain strong relationships throughout our south central Pennsylvania service area.



Hilda Shirk



Joe Crosswhite



Mandy Arnold

Elaine
BonneauRichard
Broadbent

Philip Fague



Richard Farr



William Funk

Roxanna
GapsturStephen
Holoviak

Paul Minnich



Linda Pugh



Andy Williford

WELLSPAN HEALTH BOARD MEMBERS & EXECUTIVE LEADERSHIP TEAM

The WellSpan Health Board of Directors is a volunteer governing board tasked with oversight of WellSpan Health. Members are elected to three-year terms, with officer terms lasting one year. Board members in 2023:

Hilda Shirk, PhD, MSW, Chair, Retired President and CEO of Lancaster Health Center (Now Union Community Care)

Joe Crosswhite, Vice Chair, Retired Banking Executive

Mandy Arnold, President and CEO, Gavin

Elaine Bonneau, Lead Consultant, Bonneau & Associates

Richard Broadbent, President, Bench Dogs

Philip Fague, C.P.A., Executive Vice President, Wealth Management and Mortgage, Orrstown Bank

Richard Farr, Executive Director, Rabbittransit and Capital Area Transit

William Funk, DMD, Retired, Founder of Cocalico Dental Offices

Roxanna Gapstur, PhD, RN, President and CEO, Wellspan Health

Stephen Holoviak, PhD., Retired, Penn State University, Mont Alto

Paul Minnich, Esq., Partner, Barley Snyder

Linda Pugh, PhD, RNC, Faan, Retired Professor, University of North Carolina Wilmington's School of Nursing

Andy Williford, Head of Human Resources, Volvo Construction Equipment

Executive Leadership Team



Roxanna
Gapstur



Anthony
Aquilina



Laura
Buczkowski



R. Hal Baker



Robert Batory



Victoria
Diamond



Cindy
Fruitrail



Harvey
Green



Niki Hinckle



Megan Lecas



Amy Nelson



Geoff
Nicholson



Keith Noll



Kasey Paulus



Michael Seim



James Stuccio



David Vega

Roxanna L. Gapstur, PhD, RN

President and Chief Executive Officer

Anthony Aquilina, DO

Executive Vice President & Chief Physician Executive

Laura Buczkowski

Executive Vice President & Chief Financial Officer

R. Hal Baker, MD

Senior Vice President and Chief Digital Information Officer

Robert J. Batory

Senior Vice President & Chief Human Resources Officer

Victoria Diamond, MPA

Senior Vice President, Central Region and President, WellSpan York Hospital

Cindy Fruitrail

Senior Vice President & Chief of Staff

Harvey Green

Senior Vice President & Chief Development Officer

Niki Hinckle

Senior Vice President, West Region

Megan Lecas

Senior Vice President, Service Lines

Amy Nelson

Senior Vice President & General Counsel

Geoff Nicholson, MD

Senior Vice President and Chief Clinical Officer, Population Health

Keith Noll

Senior Vice President and Chief Administrative Officer

Kasey Paulus, RN

Senior Vice President & Chief Nursing Executive

Michael Seim, MD

Senior Vice President & Chief Quality Officer

James Stuccio

Senior Vice President, East Region

David Vega, MD

Senior Vice President, WellSpan Health and Chief Medical Officer, WellSpan Medical Group

About This Report

At WellSpan Health, we are committed to Working as One to improve health through exceptional care for all, lifelong wellness and healthy communities. Our Board of Directors, executive leadership team and 20,000 team members are dedicated to fulfilling this mission by living our values and diligently executing our strategy.

This 2023 WellSpan Environmental, Sustainability, and Governance Report provides an update on our environmental, social and governance practices, programs and policies. It was published in April 2023 and reflects our activities and initiatives for the 12-month period January 2022 – December 2022, unless otherwise stated, as well as certain subsequent events and initiatives that occurred after this period and prior to publication. It includes forward-looking statements about our business plans, initiatives and objectives which may change based on subsequent developments.

POLICY LINKS

[Health Insurance Portability and Accountability \(HIPAA\)](#)

[Privacy](#)

[Notice of Privacy Practices](#)

[Editorial/Conflict of Interest](#)

[Non-Discrimination](#)

[Employee Code of Conduct](#)



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