

Code of Conduct

Effective Date: 01/01/2018

Policy

- A. It is the policy of the ACO to ensure that the Code of Conduct, which describes compliance expectations, is established and reinforced by the ACO Governing Body.

Applicability

This policy and procedure applies to all Next Generation Participants, Preferred Providers, Next Generation Professionals, and other individuals or entities performing functions or services related to the ACO's activities.

Procedure

- A. The Code of Conduct is developed and reviewed with senior management involvement and is approved by the Governing Body on an annual basis or when updates are necessary, whichever occurs first.
- B. The Compliance Officer or designee will provide training to all Next Generation Participants, Preferred Providers and Next Generation Professionals on the Code of Conduct and the ACO's policies and procedures upon hire or contracting and at least annually thereafter.
- C. The Code of Conduct is designed to promote honest, ethical and lawful conduct by all Next Generation Participants, Preferred Providers and Next Generation Professionals. Standards of conduct will clearly define expectations of "professional behavior."
- D. The Code of Conduct is written in a way that is easy for all parties related to or doing business with the ACO to understand and comprehend. The Code of Conduct is provided to Next Generation Participants, Preferred Providers, and Next Generation Professionals upon hire or contracting, when the standards are updated, and on an annual basis.
- E. The ACO, Governing Body, Next Generation Participants, Preferred Providers and Next Generation Professionals are required to comply with this Code of Conduct.
- F. Any Next Generation Participant, Preferred Provider, Next Generation Professional or other individuals or entities performing functions or services related to the ACO's activities that knowingly violate the Code of Conduct shall be subject to appropriate adverse action, up to and including termination of the individual's relationship with the ACO.
- G. All parties are required to report immediately to their supervisor, the Compliance Officer, or through the Compliance Hotline whenever they reasonably suspect that unethical or criminal conduct has occurred or may occur.
- H. Critical issues identified by any individual shall be escalated to senior management by Compliance to ensure clear understanding of risks and that concerns are addressed at all levels of

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management. This two-way communication is supported by an “open door policy” which promotes open access to senior management for all individuals related to the ACO.

- I. Corrective action will be taken as necessary to ensure compliance with the Code of Conduct.
- J. The Code of Conduct will be reviewed at least annually to ensure changes to existing laws, regulations, identified risks, and corporate best practices are incorporated and revisions applied.
- K. Any updates to the Code of Conduct will be approved by the Collaborative Health Systems (CHS) Compliance Department and the Governing Body.

Reporting

- A. Quarterly reporting is provided to the Compliance & Ethics Subcommittee and the Governing Body on all compliance activities including, but not limited to, training, reports of non-compliance and violations of the Code of Conduct, responses to those violations, and results of internal audits.

Related Documentation

- A. Next Generation ACO Model Participation Agreement Section XVII
- B. ACO Terms & Definitions Policy
- C. Code of Conduct