

# Code of Conduct

Effective Date: 10/19/2017

Draft/Review Date: 10/19/2017

## 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 Participants, Providers/Suppliers 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 Participants and Providers/Suppliers on the Code of Conduct and the ACO's policies and procedures upon hire and at least annually thereafter.
- C. The Code of Conduct is designed to promote honest, ethical and lawful conduct by all Participants and Providers/Suppliers. 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 Participants and Providers/Suppliers upon hire or contract, when the standards are updated, and on an annual basis.
- E. The ACO, Governing Body, Participants, and Providers/Suppliers are required to comply with this Code of Conduct.
- F. Any Participant, Provider/Supplier, 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 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.

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- 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 Governing Body.

## Reporting

- A. Quarterly reporting is provided to 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. 42 CFR §425.106, §425.216, §425.300
- B. ACO Terms & Definitions Policy
- C. Code of Conduct