

TORRANCE MEMORIAL INTEGRATED PHYSICIANS

Policy/Procedure: **Code of Conduct**

Policy:

It is the policy of TMIP ACO to operate all of its programs and services with the high standard of business conduct. This policy defines TMIP ACO’s commitment to support a culture of trust and integrity.

Procedure:

1. No ACO Personnel may make improper use of the property of the TMIP ACO or permit others to do so. Examples of improper use include the unauthorized appropriation or personal use of services, equipment, technology and patents, software and computer and copying equipment and the alteration, destruction or disclosure of data.
2. Seeking, accepting, offering or making any payment, gift or other thing of value to or from any subcontractor, vendor, supplier or potential contractor for the purpose of obtaining or acknowledging favorable treatment under a private or government contract or subcontract is strictly forbidden. Ordinary business courtesies or noncash de minimum gifts (under \$50 in value) which are not solicited may be accepted by the TMIP ACO.
3. The TMIP ACO may provide gifts of de minimum value (under \$50) in the nature of pens, mugs, etc., to participating providers for attendance at ACO events.
4. Offering or making any payment, gift or other thing of value to an actual or potential referral source (e.g. a referring physician) is prohibited unless permitted by the Next Generation ACO Plan or unless approved by the Governing Board after consultation with the Compliance Officer.
5. As a general rule, ACO Personnel are prohibited from providing gifts or other remuneration to beneficiaries. Certain “in-kind” items or services may be provided to beneficiaries if they are reasonably connected to the beneficiaries’ care and the items or services are preventive care items or services or advance a clinical goal for the beneficiary (such as adherence to a drug or treatment regime, a follow-up care plan, or management of a chronic disease or condition).
6. ACO Personnel are prohibited from avoiding at risk beneficiaries. An “at-risk beneficiary” includes, but is not limited to, a beneficiary who: (1) Has a high risk score on the CMS-HCC risk adjustment model; (2) Is considered high cost due to having two or more hospitalizations or emergency room visits each year; (3) Is dually eligible for Medicare and Medicaid; (4) Has a high utilization pattern; (5) Has one or more chronic

conditions. (6) Has had a recent diagnosis that is expected to result in increased cost; (7) is entitled to Medicaid because of disability; or (8) is diagnosed with a mental health or substance abuse disorder.

7. Subsidies from vendors for hospitality may not be accepted outside of modest meals or social events that are held as part of a conference or meeting. Other subsidies shall be subject to the approval of the ACO Administration.
8. All entries on books and records, including financial records and expense accounts, shall be accurate and complete and conform to applicable policies.
9. ACO Personnel shall use their best efforts to avoid violations of Federal copyright laws, including, but not limited to, laws pertaining to computer software.
10. All ACO Personnel shall refrain from any conduct during the performance of their duties that has the appearance of impropriety or that could reasonably be construed as contrary to the interests of the ACO or rules of professional ethics.

Initial Effective Date:

Revised Effective Date(s):

Reviewed Date(s):

Revised Date(s):