

MaineHealth  
**Accountable Care  
Organization**

<b>Policy # 03</b>	<b>Effective Date:</b> 10/24/2014	<b>Reviewed Date:</b> 05.25.18/ 10.25.19
<b>Title: Code (Standard) of Ethical Conduct</b>	<b>Owner:</b> Compliance Official	
<b>Reviewed &amp; Approved by:</b> MaineHealth ACO Board		<b>Date:</b> 05.25.18

## **I. PURPOSE**

This Code of Conduct has been adopted by the MaineHealth Accountable Care Organization (MaineHealth ACO) to provide standards or guidelines by which its work force will conduct themselves in order to protect and promote honesty and integrity throughout the organization and make the MaineHealth ACO better able to achieve its mission. The MaineHealth ACO has been committed to a culture and expectation of ethical and legal behavior throughout the organization since its inception. This Code reflects those values. The MaineHealth ACO also relies upon this Code as part of its social responsibility standards because it realizes that the MaineHealth ACO may at times be held to higher standards of performance in serving the public well and in an ethical and legal manner.

## **II. INTRODUCTION**

### **A. Use of Code**

The MaineHealth ACO operates in a heavily regulated and rapidly changing field. Questions frequently arise that are both ethical and legal in nature. The issues must be decided consistent with the highest standard of ethical conduct. Many activities are covered by specific policies currently in place. The Code does not replace those specific policies but is meant to provide the "big picture" of conduct that is expected of the MaineHealth ACO Staff. In any case where a specific policy is in place, Staff must follow the policy. No set of policies can cover every difficult circumstance one may face nor substitute for good judgment and common sense. The Code provides further guidance for decisions and practices in daily work. This Code is intended to be a living document with updates, changes, and additions developed in the future. The Code of Conduct will be disseminated to all new Staff within 90 days of hire and annually thereafter; and, whenever policies and procedures/standards of conduct are revised or updated. The MaineHealth ACO utilizes the MMC/MaineHealth system-wide policies as well as the MaineHealth ACO policies.

### **B. Commitment to Compliance**

The MaineHealth ACO staff is required to follow the Code. The MaineHealth ACO has a Compliance Committee ("Committee") that developed, implemented, and enforces the Corporate Compliance Program. It has designated a Compliance Official and staff to be responsible for the Program. The Committee also makes certain people outside the MaineHealth ACO are aware of the Code. The Committee makes every reasonable effort to inform such parties of the MaineHealth ACO's requirement for complying with the Code and the Corporate Compliance Program. Management is committed to having effective programs for

compliance and takes corrective action when failures to comply are discovered. All employees have the duty to understand and comply with laws and regulations which relate to their jobs and they will be held accountable for their actions. Violations of the law or the Code are very serious matters and can lead to disciplinary actions up to separation of employment. Sacrificing legal or ethical standards to pursue business or financial results is unacceptable. Staff is also reminded that they must follow the Human Resource policies and any institutional and departmental policies that apply to them. The MaineHealth ACO also has a policy to investigate (on a confidential basis) any suspected violation of the law, and if the conclusion is reached that a possible violation has occurred, it will take appropriate corrective action. The MaineHealth ACO expects its leaders in particular to set the example, to be role models. Those with supervisory responsibilities should use their authority respectfully and with close attention to the standards in this Code and the policies noted.

### **B. Code Applies to all Staff; Leadership**

The term “Staff” includes the MaineHealth ACO’s Officials, Board of Trustees, committee members, managers, employees and others as required.

All Staff shall be provided, upon initial hire, a copy of the Code and advised that Staff is expected to comply with the Code of Conduct.

## **III. ORGANIZATIONAL ETHICS**

The MaineHealth ACO is committed to being a leader in supporting value-based, integrated and patient centered health care. That commitment imposes upon the MaineHealth ACO and its staff a responsibility of public trust that goes beyond legal and business obligations. The MaineHealth ACO must operate in a caring and ethical manner in coordinating care and in doing business. The MaineHealth ACO has established and must continue to develop and communicate standards for expected conduct of Staff to serve as ethical guideposts in making decisions that meet the expectations of patients and the community. Those standards represent the values and beliefs that describe our culture and shape our practices and our decisions. The Code supports the stated and implicit values within our mission, including our commitment to quality and excellence, respect for patient rights and confidentiality, access to care without discrimination, and fiscal responsibility. The Code also reveals universally held human values such as honesty, integrity, respect for others, and ethical behavior with all decisions and practices.

### **A. Honest Communication**

No Staff shall make false or misleading statements to any patient, person, or other, including any licensing or accrediting body, about patients, activities and services of the MaineHealth ACO.

The MaineHealth ACO requires candor and honesty from individuals in performing their duties and in communication with its attorneys, auditors, and government officials.

### **B. Accurate Records**

Staff must record and report information accurately and honestly. Staff should never create any false or misleading document or accounting, financial or electronic record for any purpose and no one may instruct another to do so. This requirement covers business expenses, revenues and costs, and other businessrelated activities. Financial records should be maintained in accordance with generally accepted accounting principles; most are subject to audit. Staff may also be required to report on, and perhaps

certify, information needed to fulfill government contracts. Staff shall not damage, destroy, remove, or hide any such records in violation of the law or any of the MaineHealth ACO policies.

### **C. Personal Use of Confidential Business Information**

Confidential information about patients and employees is described later in this Code but business information may also be confidential. Staff shall not make personal use of information belonging to the MaineHealth ACO or another person or entity that should be kept confidential for business reasons -- sometimes called "proprietary". Staff shall not improperly copy for their own use documents or computer programs in violation of relevant copyright laws or licensing agreements. Staff shall not use confidential business information obtained from competitors, including customers' lists, price lists, or confidential information from prior employment, in performing their duties for the MaineHealth ACO.

### **D. Conflicts of Interest**

Generally: Staff may not use their positions to profit personally or to assist others in profiting in any way at the expense of the MaineHealth ACO. All Staff are expected to disclose all actual and potential conflicts of interest and to avoid improper acts and the appearance of improper acts arising from the influence of those activities on business decisions of the MaineHealth ACO. Staff must obtain clarification from their immediate supervisors or the Compliance Committee on whether a conflict exists or may arise from certain activities. Staff must also comply with the Conflict of Interest policy. The following partial list can serve as a guide for the types of activities by Staff, or household members of such staff, which may cause conflicts of interest:

- Investments or employment with any outside concern that does business with the MaineHealth ACO except for stock held in publicly traded corporations;
- Participating in any transaction for personal gain in which the MaineHealth ACO is a party;
- Disclosure or use of confidential or "insider" information about the MaineHealth ACO, particularly for personal profit or advantage;
- Competition with the MaineHealth ACO directly or indirectly, in the purchase, sale or ownership of property or business interests; and
- Participating in any business or employment that may conflict with the proper performance of one's duties at the MaineHealth ACO.

Participation on Boards of Directors/Trustees: Staff must obtain approval from their supervisors prior to serving as members of the boards of directors or trustees of organizations whose interests may conflict with those of the MaineHealth ACO. Civic, charitable, scientific and educational organizations do not require such prior approval unless their charitable missions are in conflict or competition with the MaineHealth ACO.

Expression of Opinions and Advocacy for Causes: Staff is free publicly and privately to express their views and advocate for the support of causes and organizations unrelated to the MaineHealth ACO outside the workplace and working hours. Such actions shall not publicly identify staff as employed by or connected with the MaineHealth ACO. Any private communications identifying the person as the MaineHealth ACO staff must also include a disclaimer indicating the views expressed are personal and not those of the MaineHealth ACO. Staff will be held accountable to the Social Media policy.

## **E. Gifts and Gratuities**

Generally: Business with suppliers, vendors, contractors, providers, government entities, health plan and others must be conducted free from offers or solicitation of gifts and favors or other items of value in exchange for influence or assistance in a transaction. Staff may not receive any gift or gratuities. If there is any doubt about whether specific conduct or activities are appropriate, the individual should contact his or her immediate supervisor or the MaineHealth ACO Compliance Official or the Compliance Committee.

Gifts from Patients: Staff is prohibited from soliciting tips, personal gratuities or gifts from patients and family members and from accepting any monetary tips or gratuities. Staff may accept non-monetary gifts of a modest value from patients and patients' families and, as a general rule that means costing less than \$75.00. Examples may include a plate of cookies at a holiday or when refusal of such gift may be insulting or inappropriate in that situation. If a patient or another individual wishes to present a gift of money, or larger value gift, he or she should be referred to the MaineHealth ACO's Compliance Official.

Workshops, Seminars and Training Sessions: Attendance at local, vendor sponsored workshops, seminars and training sessions is not permitted. Attendance, at vendor expense, at out-of-town seminars, workshops and training sessions is generally not permitted. Exceptions may include vendor sponsored seminars for the purposes of education or training from that vendor. Staff should clarify attendance requests and seek approval from their supervisor who shall be satisfied that attendance will not influence decision-making.

## **F. Use of Institutional Assets**

Use and Reporting: Staff should try to preserve and protect the corporation's assets by making prudent and effective use of the MaineHealth ACO's resources and accurately reporting its financial condition. Any individual aware of the loss or misuse of assets should report it to his or her department director who may consult with the, Compliance Official, HR department or the MaineHealth Audit & Compliance Services Department for advice on actions to be taken.

Internal Controls: The MaineHealth ACO has established internal control standards and procedures to ensure that assets are protected and properly used and that financial records and reports are accurate and reliable. All Staff share the responsibility for complying with required internal controls.

Travel and Entertainment: Travel and entertainment expenses should be consistent with the Staff's job responsibility and the MaineHealth ACO's needs and resources. Staff should suffer neither a financial loss nor a financial gain as a result of business travel and entertainment. Staff also must comply with the MaineHealth ACO's specific policies relating to reimbursement for travel and entertainment expenses.

Personal use of Corporate Assets: All MaineHealth ACO property shall be used to further the MaineHealth ACO's interest rather than the personal interest of any individual. Staff is prohibited from the unauthorized use or taking of the MaineHealth ACO's equipment, supplies, materials or services for personal benefit. Occasional use of the MaineHealth ACO equipment or materials such as the photocopier or telephone, when the added cost to the MaineHealth ACO from such use is insignificant, is permitted. Any use of such MaineHealth ACO property for an outside community or charitable organization requires prior approval from the staff member's Supervisor. Staff must obtain the approval of their immediate supervisors before engaging in any activity on company time that will result in financial benefits to Staff or that involves the

use of the MaineHealth ACO's equipment or materials for personal purposes, except for occasional use as noted above and involving only a momentary interruption from work time.

Intangible Assets: Staff have access to intangible assets belonging to the MaineHealth ACO such as intellectual property (trademarks and copyrights), and proprietary information and trade secrets (confidential data, computer programs, designs and business expertise) which must be protected as carefully as the MaineHealth ACO's physical property.

Proprietary Information: Staff must not disclose trade secrets, either during or after employment, except to individuals authorized by the MaineHealth ACO and who are bound by confidentiality agreements. Similar restrictions, usually described in contracts, apply to information obtained by staff from customers and suppliers.

Use of Computer Assets: Use of the MaineHealth ACO's computers is provided solely for legitimate MaineHealth ACO purposes though limited and occasional use for personal purposes is permitted if it does not interfere with the regular performance of the staff member's duties. All Staff are accountable for all actions performed through access to the MaineHealth ACO's computers with their log-on ID as more specifically described in the computer access agreement signed by Staff when given access log-on ID. Staff is not permitted to install their own copies of any software on any of the MaineHealth ACO's computers. Staff is not permitted to copy software from the MaineHealth ACO's computers and install it on computers at home or elsewhere.

Use of the Internet: Staff shall not use the MaineHealth ACO's computers to access the internet for personal gain, nor charitable, community, political, or religious activities sponsored by others. Limited and occasional use for personal purposes is permitted if it does not interfere with the regular performance of the staff member's duties and subject to the Human Resources Electronic Mail & Internet Usage policy. Only individuals who have been authorized by appropriate MaineHealth ACO management may express opinions on behalf of the MaineHealth ACO with on-line correspondence. All other Staff must include a disclaimer in all Internet communications to the effect that any opinions expressed are personal and are not necessarily those of the MaineHealth ACO. Communications that may be considered racially, ethnically, sexually, or otherwise offensive or threatening are prohibited. The MaineHealth ACO prohibits the use of internet access provided by the MaineHealth ACO or its equipment to view, download, store, transmit, or create pornographic, sexually explicit, racist, or similarly offensive or inappropriate materials, to access or use data for any unlawful purpose, and to use the internet access or equipment in violation of the Human Resources Electronic Mail & Internet.

#### **IV. ORGANIZATIONAL ETHICS OVERSIGHT**

##### **Compliance Committee**

The Compliance Committee is expected to develop, implement and enforce programs, policies and procedures to maintain an environment for staff to perform their daily tasks in an ethical manner and in compliance with legal requirements. The Committee will also consider ethical aspects of specific issues brought to its attention. Key responsibilities of the Committee include the following:

##### **Review of Institutional Standards and Policies**

##### **Oversight of Audit & Compliance Department Staff Activities**

## Ensuring appropriate Education and Training

## Communication with Managers

## Ensure Appropriate Reporting and Corrective Action

### **V. LEGAL COMPLIANCE**

The MaineHealth ACO will ensure that all activity by or on behalf of the MaineHealth ACO complies with applicable laws. The laws most frequently noted to apply to activities at the MaineHealth ACO are summarized below but a complete list is too lengthy for the Code. The Compliance Committee and Compliance Official can answer questions and provide guidance relating to other laws and regulations. The Helpline described below may also be used.

#### **A. Medicare/Medicaid Compliance**

The MaineHealth ACO expects Staff to refrain from conduct which may violate the "fraud and abuse" laws; those laws relating to billings, provider kickbacks, and patient referrals. These laws are usually relevant to business transactions, such as contracts and joint ventures, involving physicians or other health care providers and the MaineHealth ACO.

Ineligible Staff: The MaineHealth ACO does not employ staff or allow physicians and other clinical staff to provide services without proper licenses and credentials. Staff must report any resignations, suspensions, loss of license or criminal convictions. The MaineHealth ACO does not employ or contract with any individual who has been excluded, or is pending exclusionary actions. Staff must report any such suspension or exclusion. MaineHealth Audit and Compliance performs regular Federal and State Exclusion Checks on the MaineHealth ACO's entire workforce.

#### **B. Antitrust Compliance**

General Policy: The laws relating to competition (the antitrust statutes) maintain our free enterprise system by prohibiting business activities that unreasonably restrain trade or lessen competition. The government has determined that vigorous competition benefits the public by insuring that the highest quality products and services are available at the lowest prices. The policy of the MaineHealth ACO is to comply fully with all federal and state antitrust laws as they apply. In many cases, circumstantial evidence is the basis for accusations of antitrust violations so staff must avoid even the appearance of anti-competitive conduct.

Relationships with Competitors and Affiliates: Generally, any agreement or understanding between competitors which unreasonably restrains trade is illegal. The best way to avoid unlawful agreements is to make all business decisions on the basis of completely independent judgment and self-interest, without any communication with competitors. To help comply with this request Staff should:

- Avoid discussions with others of our prices or theirs, except when negotiating a purchase of goods or services;
- Avoid discussions about which services or geographic areas will be covered by individual providers;
- Avoid discussions about refusing to deal with certain suppliers and customers; and
- Avoid so-called "off the record" discussions with competitors.

## **C. Human Resources Compliance**

Commitment to Employees: The MaineHealth ACO recognizes the personal value of every employee. The MaineHealth ACO is committed to having each employee treated with respect and judged as an individual on the basis of qualifications to perform job responsibilities without regard to race, creed, sex, religion, national origin, age, disabilities, sexual orientation or any other classification prohibited by law.

This commitment extends to all areas of employment including applications and hiring, promotions, transfers, employee benefits and employee disciplinary actions. Employees are also encouraged, through the use of established procedures, to express views freely and responsibly.

Prohibition Against Discrimination, Harassment, and Workplace Violence: The MaineHealth ACO is fully committed to providing a work environment in which employees are free from sexual and other harassment. No employee shall create an environment in which other employees are made to feel uncomfortable such as by the use of coarse language or telling sexually suggestive or race-oriented jokes. Words or conduct that involves or threatens crimes or harm against a patient or another staff member will not be tolerated. No form of discrimination against classifications protected by law will be permitted. Each allegation of harassment, violence or discrimination will be promptly investigated in accordance with applicable human resource policies.

Important HR Policies: The MaineHealth ACO has a number of existing policies and procedures which demonstrate its commitment to employee relationships including the following:

- Commitment to compliance with state and federal wage and hour laws requiring that all nonexempt (hourly) employees' work hours are accurately recorded, employees are encouraged to take appropriate breaks and employees are paid for all time worked;
- Commitment to providing and maintaining a safe, healthful drug free work environment for all patients and visitors; and
- Commitment to family and medical leave for child birth, adoption, or serious health condition that makes an employee unable to perform the functions of his or her job or to care for an employee's child, parent or spouse with a serious health condition.

Employment Status: Individuals hired to provide services similar to those provided by regular employees should be treated as full time, part time and per diem employees as appropriate under human resource department policies. Labeling employees as "contractors" to avoid paying payroll taxes or employee benefits is inappropriate unless such individuals truly function in an independent capacity.

## **D. Environmental Compliance**

Commitment: The MaineHealth ACO is committed to operating its business in a manner that respects our environment and conserves natural resources. Staff shall try to use resources appropriately and efficiently, and to dispose of all waste in accordance with applicable laws and regulations. Involved Staff shall work cooperatively with the appropriate authorities to remedy environmental contamination on its properties. Spills and releases of hazardous materials must be reported immediately to ensure that necessary reports can be made and cleanup can begin. Failure to prevent, report, or correct environmental problems can result in substantial criminal and civil penalties.

## **E. Professional License**

Acts within Scope of License: Licensed personnel may provide patient care services for which they are licensed. They must also report to their supervisor any suspension, revocation, proposed exclusion action, pending criminal charges, or change in license status.

## **F. Lobbying/Political Activity**

Organization Prohibited from Participation: Participation by citizens in federal, state and local government is an important part of the democracy in which we live. In participating in political activities, however, Staff must make sure that their activities are not viewed as activities taken on behalf of the MaineHealth ACO. Contributions to candidates -- whether direct or indirect -- are strictly prohibited. For those reasons, the MaineHealth ACO has developed the following policies.

- Staff is encouraged to participate in the electoral process by voting and by supporting candidates and issues of their choice. Speaking out on public issues is acceptable, but Staff should not give the appearance that they are speaking on the MaineHealth ACO's behalf other than the MaineHealth ACO President or Chief Executive Officer and those authorized by the President or Chief Executive Officer;
- No Staff shall, directly or indirectly, contribute or expend any of the MaineHealth ACO's money, property or services for any use prohibited by laws regulating the electoral process or political activity of corporations. Staff shall therefore avoid such activity during work time that can be construed as a contribution to a political campaign. Use of the MaineHealth ACO's property for any such political activity is similarly prohibited. Spending time at work, or time when Staff should be working, for the benefit of a political campaign is regarded as a contribution and not permitted;
- All of the MaineHealth ACO's transactions with governmental bodies and officials shall be conducted in an honest and ethical manner. Any attempt to influence the decision-making process of governmental bodies or officials by an improper offer of any benefit is absolutely prohibited; and
- Staff may not seek reimbursement in any manner for their political activities.

## **G. Federally Funded Grants**

From time to time the MaineHealth ACO receives various federal grants such as grant funding. Federal regulations impose duties and obligations upon the recipients of federal grants such as accurate reporting and controlled expenditures of grant funds. Questions relating to matters concerning federal grants should be directed to the MaineHealth ACO's Chief Operating Officer to ensure that all applicable regulations are observed.

## **VI. CONFIDENTIALITY**

The MaineHealth ACO and its Staff have access to a broad variety of confidential, sensitive and proprietary information which if released improperly, could injure patients, employees and the organization. All Staff must safeguard this confidential information, and all Staff must abide by the MaineHealth ACO policies and applicable legal and ethical standards.

Patient Information: All Staff are required to maintain the confidentiality of patient information in accordance with applicable HIPAA standards, Maine State laws and the MaineHealth ACO policies. The Federal HIPAA Privacy and Security standards, Maine's confidentiality statute, and other laws covering mental health, HIV and substance abuse information all regulate how Business Associates can use and disclose health information and require Business Associates to maintain the confidentiality of this information. Such patient information is referred to as Protected Health Information (PHI). The MaineHealth ACO has an extensive program for meeting HIPAA privacy standards, including policies, protocols, and staff to educate and monitor compliance. All staff will receive HIPAA training that is designed to educate them as to the various requirements to protect PHI and prevent its improper use or disclosure, report and take remedial steps for any improper disclosure, and limit its disclosure to third persons except as the standards permit. Violations of HIPAA provisions could result in civil and criminal penalties for the MaineHealth ACO and the individual responsible for the breach. The MaineHealth ACO has enacted specific policies to comply with these various regulations, and all Staff is required to comply with these policies.

No patient information (PHI) shall be revealed to anyone outside of the MaineHealth ACO, except in accordance with the MaineHealth ACO's institutional policies. Patient information must be held in confidence, and should only be disclosed to other Staff on a need-to-know-basis. Staff must not abuse their access to confidential information, or even worse, abuse their position to discover confidential information that their job does not require them to know. Accessing information about friends, family, co-workers, and public figures is strictly prohibited unless you have a legitimate need to know as part of your job. Staff should be extremely careful about discussing any confidential matters where it may be overheard by others. Staff should secure their workstations and other devices and locations where health information is stored. Staff should immediately notify the MaineHealth ACO Privacy Official if they become aware of any confidentiality breaches.

Employee Information: Salary, benefit and other personal information relating to employees shall be treated as confidential. Personnel files, payroll information, disciplinary matters and similar information shall be maintained in a manner designed to ensure confidentiality in accordance with applicable laws. Staff should take measures to prevent the release or sharing of information beyond those individuals who may need such information to fulfill their job functions.

## **VII. EXPECTATION TO FOLLOW THE CODE**

### **A. Enforcement Policies**

The MaineHealth ACO expects each person to whom the Code applies to abide by them along with other policies and procedures relating to the Code, some of which are specifically mentioned. Failure to abide by the Code can lead to corrective action under the MaineHealth ACO Human Resources policies. For alleged violations of the Code, the MaineHealth ACO will investigate fully, weigh relevant facts and circumstances, including, the extent to which the behavior violated the express language or general intent of the Code, the seriousness of the behavior, and other factors which are referred to in such Human Resource policies. Discipline for failure to abide by the Code that may be imposed by the MaineHealth ACO can range from reprimand to separation from employment. The MaineHealth ACO may modify, amend or alter the Code and such supporting policies in the future.

## **VIII. RESPONSE TO GOVERNMENTAL AUDITS AND INVESTIGATIONS**

### **A. Cooperation**

The MaineHealth ACO may periodically receive inquiries from state and federal government agencies and departments such as the Department of Justice, the Environmental Protection Agency, the Food and Drug Administration, DHHS Office of Inspector General (OIG), and Centers for Medicare Services (CMS). It is the MaineHealth ACO's policy to comply with all applicable laws and to cooperate with any reasonable requests for information from the federal, state and local governments.

### **B. Response to Requests for Information**

When a request for information is received from any government agency which is not covered by existing procedures, the MaineHealth ACO's legal counsel or the Audit & Compliance Services Department should be notified promptly before making any response. In such circumstances, no Staff should answer any questions, or produce any information or documents without prior consultation with the Audit & Compliance Services Department staff. The Audit & Compliance Services Department and the MaineHealth ACO's legal counsel shall be responsible for coordinating the MaineHealth ACO's response to investigations and the release of any information. Staff is not permitted to alter, remove, or destroy any documents or records of the MaineHealth ACO relating to requested information. Failure to comply with these requirements can cause the MaineHealth ACO penalties, including exclusion from the Medicare and Medicaid programs. Staff is also expected to cooperate with Audit & Compliance staff in collecting and analyzing documents and information relevant either to a request for information from a government agency or to other investigation or audit functions of Audit & Compliance.

### **C. Obligations of Subcontractors and Business Associates**

Subcontractors of the MaineHealth ACO who provide items or services in connection with the Medicare or Medicaid programs are expected to comply with the MaineHealth ACO's policies on responding to investigations. Subcontractors will be requested to furnish the Audit & Compliance Services Department, the MaineHealth ACO's legal counsel and authorized government officials with all information required in an investigation. Business Associates with whom the MaineHealth ACO exchanges protected health information are required to engage a Business Associate Agreement (BAA) and fully comply with all HIPAA provisions.

## **IX. ANSWERING QUESTIONS AND REPORTING VIOLATIONS**

### **A. Obtaining Answers to Questions**

The Compliance Committee serves as a special resource to answer questions concerning interpretation of the Code, but if a question arises, Staff should feel free to speak with their immediate supervisor or another superior with whom they are comfortable. Any supervisors with whom individuals speak are bound by the same standards of confidentiality and shall bring matters regarding the Code to the attention of the Compliance Official. MaineHealth Audit & Compliance Services, MaineHealth Legal Affairs Department, the President's Office, or the Compliance Helpline (662-4646) is also available for reporting violations or concerns.

### **B. Use of Helpline to Report Violations**

If Staff becomes aware of any questionable or potentially illegal conduct or behavior in violation of the Code of Conduct by anyone working for or on behalf of the MaineHealth ACO, it shall be reported immediately, fully and objectively to the individual's immediate supervisor or to the Compliance

Committee. Staff is also encouraged to call if they had an experience that made them feel uncomfortable or uneasy about the legal or ethical nature of conduct or decisions made. Every reasonable effort will be made to protect an individual's confidentiality and the information shared only with those having a need to know. Staff will not be reprimanded or subject to any discipline or retaliation for the act of making any report in good faith and without malicious intent. MaineHealth has established a Compliance Helpline on which potential violations can be reported on a confidential basis or questions asked (662-4646). MaineHealth ACO will report any compliance concerns to the appropriate entity after proper investigation.

**Contact for Additional Information:     MaineHealth ACO Office Manager**

**Administrative Approval:**



**06/29/2018**

**Jennifer Moore**  
Chief Operating Officer  
MaineHealth ACO Compliance Officer

**Date**