



# Code of Conduct

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## Introduction

Bon Secours Good Helpcare LLC (Good Help ACO) is a network of healthcare organizations (the Participants) dedicated to providing high quality, coordinated care at a reduced cost to the Medicare fee-for-service beneficiaries and other patients served by the Good Help ACO. The Good Help ACO is committed to achieving the three-part aim of improving care delivery, improving health, and reducing growth in costs. It intends to achieve this three-part aim not only through better coordination of care, but also by leading in high quality population health management. Whenever there is a question of priorities, Good Help ACO always puts the good of the patient first.

A network of this kind is called an Accountable Care Organization or ACO. Because this is a new model of patient care, new rules apply to the Good Help ACO and its Participants. This Code of Conduct addresses these rules and guides us in acting in a manner that is ethical, legal and in the best interests of our patients.

This Code of Conduct is intended as a guide for those to whom it applies. It does not take the place of the common sense and good judgment, which are an expectation of those who are part of the Good Help ACO.

The Code of Conduct applies to board members, officers, employees and vendors of Good Help ACO and to the board members, officers, employees and vendors of Good Help ACO Participants. The Good Help ACO includes all components of the Bon Secours Health System, Inc. along with several other organizations. A complete list of the Good Help Participants can be viewed at [www.goodhelpaco.org](http://www.goodhelpaco.org).

While this Code of Conduct applies across the Good Help ACO, it does not take the place of the codes of conduct, policies, and procedures already in place in the Participants in the Good Help ACO. This Code of Conduct supplements and supports the ethical practices of Good Help ACO Participants.

# Compliance

## **The Compliance Program:**

To ensure that the Good Help ACO meets its ethical and legal obligations, the Good Help ACO has created the Good Help ACO Compliance Program. This Code of Conduct is one part of the Good Help ACO Compliance Program. Other parts of the Program include appointment of a Good Help ACO Corporate Responsibility Officer, education sessions on ethical and legal conduct, audits to ensure compliance with our standards, an anonymous reporting mechanism, and a commitment to transparency. Each element of the Good Help ACO Compliance Program is designed to supplement the policies, procedures and practices of the Good Help ACO Participants.

Employees of the Good Help ACO, as well as the employees of Participants in the Good Help ACO, are expected to support and cooperate with the Good Help Compliance Program including the audits and education conducted by the Good Help ACO.

## **Reporting Concerns/Non-Retaliation:**

Employees of the Good Help ACO and its Participants are required to report any instance of suspected wrongdoing by the Good Help ACO.

The Good Help ACO has established several channels through which suspected violations of Good Help ACO's Code of Conduct and policies and procedures can be reported. Concerns can be reported anonymously by calling the Good Help ACO's toll free Values Line at 1-888-880-1286. You can also report a concern directly to the Good Help ACO Corporate Responsibility Officer at 1-410-442-3384. A complete list of Good Help ACO reporting options is listed on the last page of this Code. The Good Help ACO will investigate reported concerns on a confidential basis.

The Good Help ACO does not tolerate retaliation against an employee for reporting a concern to Good Help. Any employee who suspects that they are being retaliated against for reporting a concern should immediately call the Good Help Values Line or contact the Good Help ACO Corporate Responsibility Officer directly.

Employees of the Good Help ACO Participants should continue to report concerns about their own organizations through the reporting channels established by these organizations.

# Conflict Of Interest

The conflict of interest requirements stated here apply to employees, officers and board members of the Good Help ACO. Employees, officers and board members of Participants in the Good Help ACO should follow the conflict of interest policies of their own organizations.

Good Help ACO employees, officers and board members are expected to act in the interests of the Good Help ACO to the exclusion of any outside interest. A conflict of interest exists anytime an objective observer might question whether an individual's own personal, financial or private interests could compromise the individual's judgment on behalf of the Good Help ACO. All Good Help ACO decisions are made fairly and objectively, without favor or preference based on personal interests. Any employee, officer or board member of the Good Help ACO who believes that they are or may appear to be influenced by an outside interest is required to immediately disclose this to the Good Help ACO Corporate Responsibility Officer, who will determine how the conflict or apparent conflict is to be resolved. Many actual and apparent conflicts of interest can be resolved if the conflict is reported before it creates the appearance or reality of having influenced the judgment of the potentially conflicted individual.

All officers, managerial employees, and board members of the Good Help ACO are required to complete an annual conflict of interest disclosure form. However, this annual disclosure does not relieve these individuals of the responsibility to report actual and apparent conflicts of interest as soon as they become aware of the conflict.

# Privacy And Security

The privacy of protected health information is a complex matter. Both the Good Help ACO and its Participants have established policies and procedures to provide guidance on privacy issues. Employees, officers, board members and vendors of the Good Help ACO should address questions concerning the privacy of protected health information to the Good Help Corporate Responsibility Officer at 410-442-3384. Employees of the Good Help ACO's Participants should continue to follow the privacy and security policies and procedures of their own organizations.

To facilitate coordination of patient care, the Centers for Medicare and Medicaid Services (CMS) shares information about Medicare beneficiaries with Accountable Care Organizations such as the Good Help ACO. This information is intended to assist the organization in coordinating patient care. Patients have the right to opt out of such information sharing and it is the obligation of the Good Help ACO and its Participants to respect patient wishes in this regard.

Good Help ACO employees, officers and board members should share protected health information only as needed for patient care and Good Help ACO business operations. Even when it is appropriate to share protected health information, the information shared should always be limited to the minimum information needed for patient care or business operations.

The Good Help ACO is also responsible for the security of its information systems so that protected health information under its control can be accessed only by individuals authorized to access this information.

## Marketing Materials

Materials used to market the Good Help ACO must be truthful and honest. Moreover, all materials used to market the Good Help ACO must be submitted to and approved by CMS before being used. All marketing materials, including audio, video, online material, advertisements, printed material such as brochures and posters, posts to social media sites and any other material promoting the Good Help ACO, must be submitted prior to use to the Good Help ACO Marketing Director [or other title] for approval. This requirement extends to materials previously authorized for use in one of Good Help ACO's Participants. The Good Help Marketing Director will seek CMS approval for all such materials and notify those submitting the marketing materials if and when they can be used. Marketing materials should not be used in a discriminatory manner with respect to patient age, race, gender, sexual orientation, religious belief, physical health, mental health, medical history or genetic information.

## Patient Considerations

### **Patient Choice:**

Good Help ACO aims to improve the quality of care for patients by coordinating their care across Good Help ACO Participants. Despite this, we must not forget that patients have the right to choose where and from whom they receive healthcare services. We must never tell patients that they will receive inferior care outside of the Good Help ACO. It is our obligation to provide patients with the information and options they need to make informed decisions, whether they choose care inside or outside of the Good Help ACO.

### **Patient Care/Medical Necessity:**

While the Good Help ACO, like all Accountable Care Organizations, is committed to lowering the cost of healthcare, the Good Help ACO may not reduce or limit the medically necessary services provided to patients. The Good Help ACO intends to reduce the cost and improve the quality of patient care through the better use of information and better coordination of care - and not by denying or limiting medically necessary services.

### **Patient Care/Quality:**

Individuals and entities providing care to Good Help ACO patients must be properly licensed and possess the necessary experience and expertise to provide high quality, effective care. It is the responsibility of Good Help ACO Participants to ensure that the individuals and entities involved in providing care to Good Help ACO patients are appropriately credentialed and licensed.

### **At Risk Patients:**

Neither the Good Help ACO nor its Participants may take actions to avoid treating at risk patients. At risk patients are those who are sickest or hardest to treat as well as patients who are in generally poor health. It is the policy of the Good Help ACO and its Participants to provide high quality healthcare to all of their patients, specifically including the poor and needy.

### **Patient Opt Out:**

The Good Help ACO shall comply with all applicable requirements established by CMS with respect to the provision of notices to Medicare beneficiaries aligned with the Good Help ACO. This includes but is not limited to, notices providing for the collection and use of data concerning beneficiaries, and the right of the beneficiary to opt out of the sharing of such data. Good Help ACO will also comply with requirements for the provision of notice to CMS regarding such beneficiary elections.

### **Non-Discrimination:**

The Good Help ACO prohibits any form of discrimination in the provision of services, marketing or enrollment. The Good Help ACO and its Participants will not deny, limit or condition services to patients on the basis of patient age, race, gender, religion, sexual orientation, physical health, mental health, medical history or genetic information.

## Gifts To Patients

Employees of Participants in the Good Help ACO should follow their own organization's rules governing gifts, meals, travel and entertainment. This section of the Good Help Code of Conduct concerns only gifts to patients.

The Good Help ACO does not allow the giving of gifts or any other items of value (gift cards, tickets, vouchers) to patients for the purpose of attracting or retaining a patient within the Good Help ACO. The only time it is permissible to give an item of value to a patient is to assist the patient in adhering to their treatment regime or pursuing preventative healthcare practices. We want patients to choose to receive care inside of the Good Help ACO solely because of the service and quality of care provided.

## Accuracy Of Information

All Participants in the Good Help ACO will cooperate in the gathering, recording, and submitting of data that the Good Help ACO provides to CMS. Information provided to Good Help ACO by its Participants must be truthful, accurate and as complete as possible. Information that Good Help ACO provides to CMS, specifically including information used to determine shared savings and losses, must be truthful, accurate and as complete as possible.

## Legal Considerations

### **Commitment to Legal Conduct:**

The Good Help ACO and its Participants are committed to high standards of ethical and legal conduct. This specifically includes observing all applicable state and Federal laws including Federal criminal law, the False Claims Act, the Anti-Kickback Statute, the Civil Monetary Penalties law, and the physician self-referral law (Stark law).

Of particular importance is the fact that the Good Help ACO, Participants in the Good Help ACO, and vendors to Good Help ACO and its Participants will not solicit, offer, pay, or receive payment from physicians, providers or anyone else, whether directly or indirectly, for referrals. All referral decisions are based on what is in the best interests of our patients. Additionally, the distribution and use of any shared savings available to the Good Help ACO will not be based, directly or indirectly, on referrals among Participants.

The Good Help ACO's commitment to high standards of ethical and legal conduct requires that the vendors to the Good Help ACO and its Participants also uphold these standards. The Good Help ACO will regularly monitor the performance of those with whom it does business to ensure that the Good Help ACO's ethical and legal standards are upheld.

Should the Good Help ACO learn that it has violated a law or regulation, it is the policy of the Good Help ACO to report this violation to the appropriate legal or regulatory authority in accordance with the reporting protocol of that authority.

## Preventing Fraud, Waste and Abuse:

Good Help ACO and its Participants are committed to upholding all laws intended to prevent fraud, waste and abuse involving Federal healthcare programs. Fraud is intentionally providing false or misleading information in order to obtain money from a healthcare payor such as Medicare. Waste is the overutilization of services, or other practices that, directly or indirectly, result in unnecessary costs to Medicare. Abuse involves receiving payment for items or services when there is no legal entitlement to that payment. The Good Help ACO is not only committed to preventing fraud, waste and abuse through its own actions; it will only do business with organizations that share this commitment.

When the Good Help ACO and its Participants investigate fraud, waste and abuse, employees are required to cooperate with these investigations.

## Excluded Parties:

The Federal government excludes certain individuals and entities from participation in Federal healthcare programs such as Medicare and Medicaid. It is the responsibility of each participant in the Good Help ACO to ensure that none of its employees, providers or vendors is so excluded by periodically checking the exclusion lists maintained by the Department of Health Human Services Office of Inspector General and the General Services Administration. The Good Help ACO is responsible for ensuring that none of its own employees or providers is excluded from participation in Federal health programs.

## Transparency:

The Good Help ACO will conduct its business in a manner that is transparent according to the standards established by the CMS. This includes disclosing its governing body and key personnel, shared savings or losses, and how shared savings are used. For additional questions concerning public information about Good Help ACO, contact the Good Help ACO Public Relations Officer.

## Summary

The standards in this Code of Conduct do not take the place of the standards that prevail in the Good Help ACO's Participants. The standards stated here supplement those of the Good Help ACO Participants. Employees of Participants should continue to use the resources of their own organizations to ensure ethical and legal conduct. Employees of the Good Help ACO or its Participants are encouraged to call the Good Help Values Line at 1-888-880-1286 if they believe that the standards in this Code of Conduct have been violated. Employees may also call the Good Help ACO Corporate Responsibility Officer directly at 1-410-442-3384 with concerns or questions related to this Code of Conduct.

We can only be successful working together within the Good Help ACO if we consistently observe the ethical standards of the Good Help ACO and its Participants.

## Good Help ACO Reporting Options

### Good Help ACO Values Line:

1-888-880-1286

### Corporate Responsibility Officer:

1-410-442-3384

### Address of CRO:

1505 Marriottsville Road  
Marriottsville, MD 21104

### Confidential Fax number:

1-410-442-4639

