



**PHYSICIAN PARTNERS OF WESTERN PA  
CODE OF CONDUCT POLICY  
CIN # 104**

**I. Definitions**

**“Beneficiary”** means those persons who are eligible to receive Covered Services from Participating Providers pursuant to a Payor Contract.

**“Board”** means the CIN’s Board of Managers.

**“CIN Leadership”** means CIN officers, Board members, Committee members and Local Advisory Council members.

**“CIN Staff”** means CIN and AHN affiliate employees and independent contractors who devote a material amount of their work time to providing services to or on behalf of the CIN.

**“Committee”** means any standing committee established under the CIN’s operating agreement and any special committee authorized by Board resolution.

**“Covered Services”** means those medical services for which Payors are obligated to reimburse Participating Providers or the CIN, in whole or in part, pursuant to a Payor Contract.

**“Participating Providers”** means those facilities, physician groups and individual health care practitioners who are in the CIN’s provider network.

**“Payor”** means any third party payor including, but not limited to, an insurance company, health maintenance organization, preferred provider organization, self-funded employer or governmental entity that has entered into an agreement, either directly or through an intermediary, with the CIN to arrange for the provision of Covered Services to Beneficiaries through Participating Providers.

**“Payor Contract”** means a Board-approved written contract between a Payor and the CIN under which some or all Participating Providers provide Covered Services to Beneficiaries.

**II. Policy and Procedure**

Physician Partners of Western PA (the “CIN”) is committed to promoting compliance with applicable law and ethical business standards. Compliance is a serious matter, and a matter that is the responsibility of all CIN Leaders, Staff and Participating Providers when providing Services to the CIN or under CIN Payor Contracts<sup>1</sup>.

However we recognize that it is not enough to merely comply with laws and regulations. We believe that it is imperative to abide by the highest ethical standards in serving our customers, patients, communities, and dealing with our fellow CIN leaders, staff and participating providers. This means conducting ourselves with integrity in everything we do.

CIN board members are also bound by certain fiduciary duties (the Duty of Care and the Duty of Loyalty) that obligate them to act with the best interests of the company for which they serve.

The CIN has adopted this Code of Conduct to guide ethical behavior and legal compliance.

1. Participation in Clinical Integration Initiatives. Participating Providers must comply with CIN clinical integration initiatives to improve the quality and efficiency of health care services provided under CIN contracts, promote patient involvement and coordinate care. It is a violation of this Code for a Participating Provider to knowingly or

<sup>1</sup> Although CIN Participating Providers are independent contractors and the CIN is not legally responsible or liable for their compliance with law, CIN participation agreements require compliance with CIN policies and applicable law in connections with services provided under the agreement. Accordingly, Participating Providers are contractually obligated to abide by this Code of Conduct and failure to do so is grounds for corrective action, up to and including termination as a participating provider in the CIN’s provider network.



intentionally submit or provide false or inaccurate data or information to the CIN in connection with the CIN's clinical integration or credentialing programs.

2. Care Provided to Beneficiaries. Participating Providers are responsible for providing care to Beneficiaries under CIN Payor Contracts in accordance with the prevailing standard of care, applicable law and professional standards.
3. Protected Patient Information. The CIN is committed to maintaining the confidentiality of patient information in accordance with applicable legal standards. All access to, use of and disclosure of Beneficiary information by CIN Staff must comply with CIN Business Associate Agreements, CIN policies and applicable law. Likewise, Participating Providers are responsible for complying with CIN Business Associate Agreements and applicable law when accessing, disclosing or using Beneficiary information.
4. Submission of Accurate Claims. Participating Providers are responsible for submitting timely and accurate claims in connection with services provided to Beneficiaries under Payor Contracts. Participating Providers must never intentionally or knowingly miscode the services they render to Beneficiaries, make false or fraudulent claims for payment to Payors or Beneficiaries or assist anyone else in doing so.
5. Accurate and Complete Documentation of Services Provided to Beneficiaries. Participating Providers are responsible for ensuring that all medical record and other documentation related to services provided to Beneficiaries under CIN Payor Contracts are accurate and complete in accordance with Payor requirements and applicable law. Falsification of medical record or claims documentation related to items or services provided to Beneficiaries is strictly prohibited, including but not limited to falsification of Beneficiary diagnoses, medical necessity documentation and documentation regarding the type or scope of health care items and services delivered to Beneficiaries. Participating Providers must never falsify or direct another person to falsify a signature or a date of service in medical record or claims documentation. Participating providers are responsible for ensuring that documentation of services provided to Beneficiaries is maintained in the format and for the length of time required by Payors and applicable law.
6. No Improper Referral or Beneficiary Incentives. Participating Providers are responsible for complying with all applicable laws regarding referral and beneficiary incentives. It is a violation of this Code to offer, provide, solicit or accept cash, gifts or other remuneration (whether in cash or in kind) to induce or reward referrals or business under CIN Payor Contracts.
7. Antitrust Compliance. CIN Leadership, Staff and Personnel must comply with the CIN's Antitrust Compliance Policy and applicable law. In particular, it is a violation of policy for Participating Providers to discuss or enter into agreements to fix prices, coordinate managed care contract terms, allocate markets or refuse to deal with Payors outside of the CIN.
8. Accurate and Complete Business Records. It is essential that the CIN maintain accurate business records. CIN Staff must not knowingly, or with reckless disregard for the truth, make any false or misleading statement on any form or record, electronic or otherwise. CIN Staff must never falsify expense reports, travel/mileage records, financial data, business information, signatures or other information in any CIN record or in any filing with any Government entity.
9. Licenses, Certifications and Other Credentials. Participating Providers must maintain all licenses and other credentials in accordance with CIN credentialing standards. Participating Providers must immediately notify the Executive Director of any inquiry, investigation or adverse action by a licensing agency, Medicare, Medicaid or any other payor, including but not limited to debarment from Federal Health Care Programs.
10. Appropriate Use of Assets. CIN Staff and Participating Providers must never embezzle, steal or engage in the unauthorized use of CIN, Beneficiary or Payor property or funds. CIN Staff are expected to use CIN assets wisely to protect against their loss, theft or misappropriation by others. CIN computers and internet access should only be used for legitimate CIN-related purposes.



11. Professional Behavior. All CIN Staff and Participating Providers are expected to act in a professional manner at all times when rendering services for the CIN, performing their responsibilities under Participation Agreements or CIN Payor contracts, to be honest in their dealings with CIN Staff and Participating Providers, payors contracted with the CIN and Beneficiaries.
12. Confidential Business Information. Confidential business information of the CIN and its participating providers is a valuable corporate asset to CIN that, if inappropriately disclosed, could harm CIN. CIN Staff and Participating Providers must hold in strict confidence and shall not directly or indirectly disclose to any person or entity, or use for personal benefit, CIN or Participating Provider Confidential Information except as necessary to fulfill the CIN's business purposes and as permitted under the Participation Agreement.
13. Compliance Program Participation. All CIN Leadership, Staff and Participating Providers must participate in the CIN Compliance Program by:
  - Completing all assigned compliance training.
  - Complying with this Code of Conduct and all legal requirements and compliance policies.
  - Reporting all suspected non-compliance with this Code of Conduct, CIN policy or applicable law through one of the following channels:
    - **Mail**  
Physician Partners of Western PA LLC Compliance Officer  
P.O. Box 22492  
Pittsburgh, PA 15222
    - **Telephone**  
Anonymous Reporting Hotline  
Toll Free – 24 Hours a Day/7 Days a Week  
1-877-TO-SPEAK (867-7325)
    - **E-Mail**  
[compliance@ahn.org](mailto:compliance@ahn.org)
    - **Online**  
<https://www.mycompliancereport.com/>  
(Access Code: AHN)
  - Contacting the Compliance Officer or a manager for guidance if they are unsure if a compliance issue exists.
  - Seeking guidance from the Compliance Officer before acting whenever there is a question or concern about whether a potential course of action presents compliance concerns.
  - Cooperating in any CIN investigation of potential non-compliance.
  - Refraining from any form of retaliation against persons who report, investigate or cooperate in the investigation of suspected non-compliance.



**Effective Date:** February 23, 2017  
**Approved by the Board:** February 23, 2017  
**Previous Versions:** None

**Effective Date:** February 28, 2019  
**Approved by the Board:** February 28, 2019  
**Previous Versions:** February 23, 2017

**Effective Date:** October 22, 2020  
**Approved by the Board:** October 22, 2020  
**Previous Versions:** February 28, 2019

**Approval Signature:**   
DocuSigned By:

**Name:** William K. Johnjullo, MD  
**Title:** Acting Executive Director/Medical Director