



Integra Community Care Network  
**Code of Conduct**

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As part of its Compliance Program, Integra Community Care Network, LLC (“Integra” or the “ACO”) has established this Code of Conduct to guide all individuals involved in ACO operations and activities, including Integra’s contracted providers, suppliers, and vendors (“ACO Participants”), as well as Integra employees and contracted staff (“Integra staff”). Each of us is responsible for upholding both the letter and spirit of this Code and maintaining the highest standards of integrity, honesty, and professionalism.

**This Code outlines:**

1. The conduct and values expected in the Integra environment;
2. Integra’s commitment to complying with applicable laws, regulations, clinical standards, and ethical business practices; and
3. Our shared responsibility to promote a culture of ethics, integrity, accountability, and patient-centered care.

Integra and ACO Participants are committed to delivering high-quality, evidence-based care that is patient-centered, coordinated, cost-effective, and compliant with legal requirements. This Code has been adopted by the Integra Board of Managers and applies to ACO Participants and Integra staff who act on behalf of Integra to the extent applicable to their roles and responsibilities in Integra. It supplements, but does not replace, other applicable employer compliance policies.

Individuals employed by entities that are part of Care New England Health System (“CNE”), including Integra, must also follow the CNE Integrity & Compliance Program and related policies. Individuals employed by non-CNE organizations are also subject to their own compliance programs.

For questions, speak with your supervisor or the CNE Office of Business Integrity & Compliance (“Compliance Office”).

**Compliance Is Everyone’s Job**

This Code provides guidance on ethical and compliance obligations related to your role. Integra staff and all ACO Participants must understand and uphold this Code, lead by example, and take personal responsibility for compliance. Reporting concerns is mandatory — inaction is not acceptable. Leaders within Integra and ACO Participants are expected to foster an environment where questions are encouraged, and concerns can be raised without fear of retaliation.





## Compliance Office

Integra, through CNE, has designated a Compliance Officer to support compliance guidance and reporting and to help ensure we meet applicable standards through the framework of an effective compliance program. The Compliance Office maintains independence from operational responsibilities and has direct access to Integra's President and Board of Directors. Integra staff and ACO Participants must report, in good faith, any actual or suspected fraud, waste, or abuse; violations of law or regulation; or breaches of Integra policies. The Compliance Office is available as a resource and is committed to ensuring that all reports of potential misconduct are addressed, including ensuring that necessary corrective actions are implemented.

Reports may be made at any time, and callers may remain anonymous if they choose. Confidentiality will be protected to the extent permitted by law.

**How to Report: You should notify your supervisor and/or contact:**

- » **Integra Network Manager at (401) 430-2000**
- » **CNE Office of Business Integrity & Compliance: (401) 453-7534**
- » **CNE Compliance Hotline: 1-877-TELLCNE (1-877-835-5263)**
- » **CNE Online Report: <https://clearviewconnects.com/#/>  
(Organization: CNE)**
- » **Email: [cnecompliance@carene.org](mailto:cnecompliance@carene.org)**

Providing as much detail as possible will support a thorough review and timely resolution.

## General Standards of Conduct

### Honesty and Lawful Conduct

Integra conducts business honestly, ethically, and in compliance with all applicable laws, regulations, and ACO policies. Integra staff and ACO Participants must avoid any appearance of impropriety and refrain from dishonest, misleading, or inappropriate behavior.

### Cooperation with Integra Compliance Program:

Integra staff and all ACO Participants must cooperate fully with Integra's Compliance Program through adherence to the standards described herein and participation in activities including but not limited to:

- » Periodic auditing and monitoring activities, including allowing Integra staff or agents to conduct audits of ACO Participants' medical records documentation, quality data collection, and claims submission, as applicable to the ACO Participants' participation in Integra;
- » Compliance and other training of ACO Participants as required by the Centers for Medicare and Medicaid Services ("CMS") regulations, including distribution of compliance communication and training materials such as this Code of Conduct to employees;
- » Implementation of procedures to ensure the accurate collection, submission or transmission of quality data required by participation in the Medicare Shared Savings Program; and
- » Responding to compliance audits, investigations, reviews and inquiries, and implementation of corrective actions, as needed.

Everyone must understand Integra's compliance requirements and report suspected concerns promptly.

### Quality Care and Patient Safety

Integra is committed to high-quality, person-centered health care delivered with compassion, dignity, and respect. Medical decisions must be based on patient needs with the best interests of our patients in mind. Integra complies with oversight by federal and state agencies and continuously evaluates quality, safety, and performance standards.

### Quality Data Collection and Submission

Integra and ACO Participants must submit accurate quality and performance data under the Medicare Shared Savings Program ("MSSP")

and other payer contracts. Data must be truthful, complete, and timely. Deliberate or reckless misstatements or improper submission of data are strictly prohibited. All Integra staff and ACO Participants involved in data submission must follow all applicable laws and regulations, CMS guidance, and Integra policies.

### **Eligibility to Participate in Federal and State Health Care Programs:**

Integra and ACO Participants will not knowingly employ, contract, or do business with individuals or entities excluded from, debarred, excluded, or otherwise ineligible to participate in federal or state healthcare programs. Personnel involved in providing goods or services to Integra and/or its members must remain eligible at all times to participate in Medicare and Medicaid.

### **Confidentiality, Privacy and Safeguarding Protected Data**

All protected health information ("PHI") must be safeguarded and kept confidential in accordance with the Health Insurance Portability and Accountability Act of 1996, the Health Information Technology for

Economic and Clinical Health Act and their implementing regulations ("HIPAA") and state privacy laws. PHI may only be accessed or disclosed when authorized by the patient or permitted by law. Integra and ACO Participants must comply with CMS Data Use Agreement requirements, using data solely to coordinate and improve care for Medicare beneficiaries. The following terms shall have the meanings set forth below[FJ3] , and as set forth under HIPAA:

- » **Treatment** means provision, coordination, or management of health care and related services by one or more health care providers, including the coordination or management of health care by a health care provider with a third party; consultation between health care providers relating to a patient; or the referral of a patient for health care from one health care provider to another.
- » **Payment** means activities undertaken by a health provider to obtain reimbursement for the provision of health care, including but not limited to eligibility or coverage determination, billing, claims management, collection activities, and utilization review activities.
- » **Healthcare Operations** includes but is not limited to conducting quality assessment and improvement activities, reviewing the qualifications of healthcare professionals, conducting training programs in which students, trainees or practitioners learn under supervision, medical review, legal services, business management and general administrative activities necessary to operate the ACO.

### **No Discrimination**

Integra prohibits discrimination in care delivery, marketing, and enrollment. Services may not be denied, limited, or conditioned on any characteristic protected by state or federal law or any factor that is related to health status, such as the nature and extent of medical condition, medical history or genetic information. Practices that would reasonably be expected to discourage or deny the provision of medically necessary services to eligible individuals are strictly prohibited.

### **No Retaliation**

Integra prohibits any form of retaliation against individuals who, in good faith, report a concern or suspected violation, or who participates in an investigation of potential misconduct. Individuals who raise concerns in good faith, are protected under this policy, even if the concern is not substantiated.



## **Workplace Conduct**

Integra is committed to providing a safe, respectful, and professional work environment free from discrimination, harassment, intimidation, or retaliation.

### **Workplace Safety**

Integra promotes a safe and healthy environment for patients, staff, and the broader community. Workplace violence, threats, intimidation, or disruptive behavior are prohibited.

### **Use of Social Media**

Use of social media is not permitted while providing care or conducting ACO business unless authorized by your manager. You are expected to use good judgment when using social media on personal time and should ensure that any opinions expressed are attributed to you and not Integra.

### **How You Can Comply**

To maintain compliance with HIPAA, other laws, regulations, and Integra policies, you should NOT:

- » Post, blog, tweet or otherwise disclose any information about patients, or any other confidential information.
- » Use social media to communicate with patients or post photos unless approved by your leader.
- » Post harassing comments related to any patient, ACO Participant, provider, or contracted entity.
- » Use your work email address or other work communications coordinates (such as telephone to sign up for social media).

## **Conflicts of Interest, Gifts and Contributions**

### **Conflicts of Interest**

A conflict of interest exists whenever an individual's outside personal or financial interests influence, or appear to influence, decisions made involving Integra. Personal interests may not influence professional judgment. This applies to you as well as your immediate family members. Integra staff and ACO Participants must avoid actual or perceived conflicts of interest and must disclose any and all potential conflicts to the Compliance Office.

### **Gift and Remuneration Policy:**

Integra staff and ACO Participants may not accept gifts from patients, vendors, or partners. Offering or providing gifts or remuneration to Medicare beneficiaries to influence care choice is prohibited. Limited in-kind items or services may be provided only if compliant with all applicable laws and regulations, including CMS rules, and approved by CNE legal or compliance departments.

If you are unsure whether a gift, offer, waiver, or other engagement/incentive program is appropriate, always consult with the Compliance Office before proceeding.

### **Beneficiary Choice**

Integra and ACO Participants may not inhibit Medicare beneficiaries from exercising their freedom of choice to obtain services from health care providers and entities who are not affiliated with Integra.

### **Beneficiary Notices; Opt-Out Rights**

Integra and ACO Participants must comply with CMS beneficiary notice, data sharing opt-out, and marketing rules.

Integra and ACO Participants must comply with all applicable requirements established by CMS with respect to the provision of notices to beneficiaries/enrollees aligned with the ACO, including but not limited to, those 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. The ACO shall further comply with applicable requirements for the provision of notice to CMS regarding such beneficiary elections.

### **Political Contributions**

Integra or ACO Participant funds and assets may not be used for political campaign contributions. This prohibition applies to both direct contributions and indirect support of candidates (e.g., through Political Action Committees or PACS).

This Code does not prevent ACO Providers from making personal contributions. However, under no circumstances may you be reimbursed by Integra for such contributions. You should consult with the Compliance Office before agreeing to participate in a political activity that could involve Integra or its ACO Participants.

## Use of Marketing Materials

Descriptive ACO materials must comply with the CMS marketing material requirements. These include, but are not limited to, brochures, advertisements, outreach events, letters to beneficiaries, web pages, mailings, social media, or other activities conducted by or on behalf of Integra when used to educate, solicit, notify, or contact Medicare beneficiaries regarding Integra.

All Integra public materials must be accurate. Use of Integra's name, logos, or service marks requires prior written approval from Integra leadership.

## Compliance with Laws; Government Rules and Regulations

Integra and ACO Participants must comply with all applicable federal and state laws and regulations.

### Compliance with Fraud and Abuse Laws:

Federal and state laws prohibit the exchange of anything of value to induce or reward patient referrals for business payable by federal or state health care programs. Integra and ACO Participants will not offer, solicit, pay or receive anything of value, directly or indirectly, for referring a patient or furnishing or arranging for a good or service payable by a federal, state or other third-party payer unless such arrangement is approved in advance by the Compliance Office.

#### Scenarios that may raise concerns under these laws include but are not limited to:

- » Patient engagement or population health programs that provide free or reduced-cost benefits (such as food, housing assistance, transportation, gift cards, or other social or supportive services) in a manner that is tied to, or appears to influence, a patient's choice of provider, supplier, or services.
- » Shared savings, incentive, or performance-based payments that are not structured or distributed in accordance with approved ACO methodologies, program requirements, or applicable legal protections.
- » Providing financial or in-kind support (including staffing, technology, data analytics, or infrastructure) to ACO Participants in a way that rewards or induces patient referrals or the volume or value of services.

All ACO arrangements, including population health and value-based activities, must be structured and implemented in compliance with applicable laws, regulations, and program requirements.

## Documentation, Coding and Billing

Integra staff and all ACO Participants will adhere to laws and regulations governing the billing, coding and documentation requirements for medical services. All billing, coding and documentation must be accurate, complete, and supported by proper documentation. Only medically necessary services that are consistent with accepted standards or medical care may be billed.

Examples of documentation, coding and billing concerns include the following, without limitation:

- » Upcoding a service
- » Insufficient documentation to support medical necessity

## Credentialing and Licensure

Only properly licensed and credentialed individuals may provide care or develop treatment plans for patients of Integra and ACO Participants. ACO Participants must verify licensure and credentials of all personnel rendering services to patients of ACO Participants.

## Use of Assets and Resources

Integra facilities, equipment, systems, and supplies must be used only for legitimate business purposes.



## Accuracy of Reports

You must ensure that Integra and ACO Participants records accurately reflect operational, financial, and strategic activities. This includes, without limitation, documentation relating to accounting and finance documents, expense accounts, time records, and reimbursement requests. It also applies to all clinical and treatment documentation.

Everyone is individually responsible for records within their area of responsibility and for complying with any applicable laws, acts or statutes.

## Government Investigations

Integra and ACO Participants will cooperate in all government investigations by coordinating responses through the Compliance Office.

## Closing Thoughts

This Code reflects Integra's commitment to ethical conduct and patient-centered care and must be followed by all Integra staff and ACO Participants.

## Additional Resources

If you have any questions or concerns or suggestions for improvements — let us know. Additionally, you may contact an external organization without any fear of reprisal. The chart below provides internal and external contact information.

### If Your Concern Relates to...

- » Compliance: You want to report a known or suspected compliance concern.
- » HIPAA: You want to report a privacy violation.

### You May...

- » Call the Helpline at (401) 453-7534,
- » Call the Compliance Hotline 1.877.TELLCNE (1.877.835.5263),
  - Calls to the Compliance Hotline go to a third-party administrator so there is no audit trail or opportunity for caller identification.
- » Submit a report through <https://clearviewconnects.com/#/>,  
Organization: CNE
- » Send an email to [cnecompliance@carene.org](mailto:cnecompliance@carene.org). at any time (24/7).

## External Resources: In addition to reporting the concerns internally, the following external resources are also available:

For certain federal violations (HIPAA, civil rights/discrimination; Section 1557 nondiscrimination; language access; disability access), you may also contact the Office of Civil Rights, Regional Manager at:

### U.S. Department of Health & Human Services Office for Civil Rights – Region I

JFK Federal Building, Room 1875  
Government Center  
Boston, MA 02203

Phone: (800) 368-1019

Fax: (202) 619-3818

TDD: (800) 537-7697

Online complaint portal: <https://ocrportal.hhs.gov>. For a sexual harassment complaint, you may also contact the following external entities:

### U.S. Equal Employment Opportunity Commission (EEOC)

JFK Federal Building, Room 475  
Boston, MA 02203  
Phone: 1-800-669-4000  
Fax: (617) 565-3196  
TTY: 1-800-669-6820  
[www.eeoc.gov](http://www.eeoc.gov)

### Rhode Island Commission for Human Rights (RICHR)

10 Abbott Park Place, Suite 100  
Providence, RI 02903  
Phone: (401) 222-2661  
TTY: (401) 222-2664  
[richr.ri.gov](http://richr.ri.gov)

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**Integra Community Care Network** is a community of doctors, nurses, social workers, pharmacists, community health workers, and patients working together to improve the health and well-being of our community.



INTEGRA COMMUNITY CARE NETWORK

[www.integracare.org](http://www.integracare.org)