



Origination 02/2024
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Next Review 02/2025

Owner Stephanie Clark:
Director,
Compliance &
ACO Compliance
Officer

Area Compliance

Applicability Privia Health and
All Markets

ACO Compliance Communications

1. Purpose:

Provide a statement of ACO's policies regarding the development and distribution of Compliance Communications and procedures to ensure that ACO Participants and Provider/Suppliers are consistent with its stated policies.

2. Scope:

This policy applies to all Privia Quality Networks, all PQN's, CMG ACO and all ACO Related Individuals as defined in this policy.

3. Definitions:

- **ACO Related Individual** - ACO officers, directors, employees, ACO Participant, ACO Provider/Supplier, or any other individual or entity providing functions or services related to ACO Activities.
- **Code of Conduct** - The Privia Health Group, Inc. [Code of Conduct](#) which has also been adopted as the Code of Conduct for the ACO.
- **Compliance Communications** - An ACO communication (e.g., newsletter) highlighting the ACO's Compliance Program and other relevant compliance and legal issues, as deemed appropriate by the ACO Compliance Officer.

4. Policy:

The ACO Compliance Officer shall develop and distribute Compliance Communications (as defined in this policy) that support the Compliance Program and educate ACO Related Individuals about

compliance matters.

5. Procedure:

- A. Preparation. The ACO Compliance Officer shall be responsible for the development and distribution of Compliance Communications, either published separately or as part of other outreach communications. Members of the Governing Body or appropriate sub-committee, as well as any other individuals, divisions, or segments that the ACO Compliance Officer deems appropriate, shall provide assistance.
- B. Content.
 - 1. Compliance Communications shall contain educational information that the ACO Compliance Officer deems appropriate to highlight the ACO Compliance Program and compliance-related issues, such as:
 - a. Changes to ACO's Compliance Program, if any;
 - b. Issues identified by the ACO Compliance Officer and/or the Governing Body or appropriate sub-committee as relevant to highlight or discuss;
 - c. Upcoming compliance training and education programs; and
 - d. The ACO's compliance resources (e.g., links to the on-line version of the Compliance Plan, Code of Conduct, and Policies and Procedures, and the phone number of the Confidential Compliance Reporting Tool for use in reporting suspected non-compliance.)
 - 2. Compliance Communications may contain any other information relating to compliance that is deemed appropriate by the ACO Compliance Officer.
- C. Distribution.
 - 1. Compliance Communications shall be made available to all ACO Related Individuals, as appropriate. The ACO Compliance Officer shall determine which individuals should be included in the Compliance Communications.
 - 2. The ACO may use any appropriate format and distribution method for the Compliance Communications (e.g., paper, e-mail, intranet, and/or inclusion with other newsletters published by the ACO).
 - 3. Archived copies of the Compliance Communications shall be available upon request.
- D. Documentation. The ACO shall maintain in its Compliance Program files copies (electronic or hard copy) of all Compliance Communications issued pursuant to this policy, consistent with its document retention policies but, in no case, for a period of less than ten years.

Approval Signatures

Step Description

Approver

Date

Chief Audit & Compliance
Officer Approval

ACO Compliance Leadership
Approval #1

Dana Fields: Chief Audit &
Compliance Officer

Stephanie Carpenter: Director
of Government Programs

Stephanie Carpenter: Director
of Government Programs

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