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Next Review 04/2026

Owner Stephanie Clark:
Director,
Compliance &
ACO Compliance
Officer
Area Compliance
Applicability Privia Health and
All Markets

ACO Compliance Log

Purpose:

Outline required maintenance of the ACO Compliance Log.

Scope:

This policy applies to all Privia Quality Networks, all PQN's, CMG ACO, LLC and all ACO officers, directors, employees, ACO Participants, ACO Providers/Suppliers, contractors, or any other individual or entity providing functions or services related to ACO Activities.

Definitions:

- **ACO Related Individual**- ACO officers, directors, employees, ACO Participants, ACO Providers/Suppliers, contractors, 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 Log**- A record that includes a summary of each compliance disclosure received by the ACO Compliance Officer by or through any means or method; the status of the respective internal reviews; and any corrective action taken in response.
- **Confidential Compliance Reporting Tool**- A tool by which any individual may confidentially and anonymously report suspected problems related to the ACO to the ACO Compliance Officer.
- **Policies and Procedures**- The ACO's Policies and Procedures.

Policy:

It is the ACO's policy to respond to all compliance matters brought to the ACO Compliance Officer's attention and to maintain a Compliance Log of such matters. The Compliance Log is a record summary of compliance disclosures and shall be maintained by the ACO Compliance Officer (or his or her designee) in accordance with this Policy.

Procedure:

- A. As set forth in Privia Health's Whistleblower policy, the ACO provides ACO Related Individuals with various avenues to report any activity, practice, or arrangement that such individual believes, in good faith, violates or may violate any laws or regulations or the ACO's Compliance Plan, Code of Conduct, or Policies and Procedures.
- B. The ACO Compliance Officer (or his/her designee) must maintain a Compliance Log of all suspected compliance violations, including, but not limited to, reports made in person, via e-mail or other written form, or through the Confidential Compliance Online Reporting Tool.
- C. The Compliance Log should, at a minimum, include for each suspected compliance violation the following:
 - 1. The manner in which the suspected compliance violation was brought to the ACO's attention;
 - 2. If applicable and known, the name of the person reporting the suspected compliance violation;
 - 3. The names of all persons involved in the suspected compliance violation, to the extent such information is known;
 - 4. A summary of the suspected compliance violation, including, but not limited to, the nature and type of allegation(s) made;
 - 5. The results of any investigations;
 - 6. Any notations regarding continued monitoring, if applicable;
 - 7. A description of any corrective (or other) actions taken in response to the reported suspected compliance violation; and
 - 8. The status of the suspected compliance violation, as updated from time-to-time to reflect current information.
- D. The ACO Compliance Officer, or his/her designee, shall maintain all relevant documents and notes related to each Compliance Log entry, in accordance with the ACO's document retention policies but, in no case, for a period of less than ten years.

Documentation:

The ACO shall document compliance with this policy. Such documentation, which may include electronic documentation, shall be maintained in the ACO's Compliance Program files 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	Dana Fields: Chief Audit & Compliance Officer	04/2025
ACO Compliance Leadership Approval #1	Stephanie Clark: Director, Compliance & ACO Compliance Officer	02/2025
	Stephanie Clark: Director, Compliance & ACO Compliance Officer	02/2025