

Title: CODE OF CONDUCT AND ETHICS	Policy #: 0049 Dept: Compliance
	Reviewed/Approved By: PrimaryHealth Board of Directors
Adopted: 1/2014	Last Revision: 4/2014
Revision Dates:	Review Frequency: Every two years

Definition: PrimaryHealth and OHMS as delegated by PrimaryHealth collectively will be referred to as The CCO (Coordinated Care Organization).

I. Mission

The CCO’s Mission is to participate in the development of a healthier community, one person at a time. This mission is approved by the Board of Directors, in pursuit of the public good. Its programs support that mission, as do all those who work for or on behalf of the CCO.

II. Governance

The CCO’s Board of Directors (“the Board”) is responsible for setting the mission and strategic direction of the CCO and for oversight of the organization’s finances, operations, and policies.

III. Personal and Professional Integrity

All staff, Board members, consultants, business associates, and others associated with the CCO are committed to act with honesty, integrity, and openness in their work with the CCO. The CCO promotes a working environment that values respect, enthusiasm, excellence, and creativity. These guiding values form an integral part of this code and are attached here.

The CCO prohibits all forms of wrongful discrimination, including harassment of any kind. Members of the CCO staff shall be treated with dignity and respect, regardless of their age, gender, race, ethnicity, national origin, religion, sexual orientation, disability, socioeconomic status, or any other basis prescribed by law.

IV. Openness and Disclosure

The CCO provides comprehensive and timely information to its members, staff, and relevant stakeholders. By the same token, the CCO is responsive in a timely manner to reasonable requests for information. All information about the CCO will fully and honestly reflect the policies and practices of the organization.



A conflict of interest occurs when personal interests could interfere with your ability to make a fair, objective decision on behalf of the CCO. You should avoid relationships and activities that create, or even appear to create, a conflict of interest. If you are unsure whether a conflict of interest exists, you should talk with the Compliance Officer.

V. Legal Compliance

The CCO is committed to adhering to all applicable federal, state of Oregon, and local laws and regulations, including those related to compliance and fraud, waste and abuse. The CCO is committed to following all internal policies and procedures as it protects, expends and properly accounts for the CCO’s assets and resources.

VI. Evaluation

The CCO is a learning organization that is committed to improving program and organizational effectiveness. It is responsive to changes in its field of activity and the needs of its members.

VII. Inclusiveness and Diversity

The CCO is committed to diversity and equal opportunity in the workplace and with respect to governance. It promotes inclusiveness in its hiring, retention, and promotion of staff, Board members, and others.

VIII. Reporting Responsibility

It is the responsibility of all directors, officers, and employees to disclose all potential conflicts of interest, recuse themselves from such conflicts, and complete the appropriate conflict of interest reporting forms in a timely manner.

In addition, all staff, Board members, consultants, business associates and others associated with the CCO have the responsibility to report any activity that appears to violate laws, rules, regulations, standards or this Code of Conduct.

The CCO commits to respond to all reports in an appropriate manner, resolve substantiated reports and take steps to prevent repeat occurrences.

The CCO’S GUIDING VALUES

Respect	We are committed to a culture of respect for members, providers, community partners, and our staff. We demonstrate this at every opportunity and in every interaction. Our partnerships are built upon a foundation of trust and mutual regard.
Enthusiasm	We approach our tasks with passion and energy. We take pride in what we do.
Excellence	In everything we do, we will do it to the best of our ability. We will go the extra mile to do what is right. The quality of our work and of the services we provide is a reflection of our commitment to the CCO’s mission.
Creativity	We value creativity. Ideas are welcomed from staff, providers, and members. Innovations are born from creative minds.

