Policy AD503

Subject	AD503 - Compliance Reporting and Non-Retaliation		
Category / Section	Administration / Corporate Compliance		
Owner	Director of Corporate Compliance		
Reviewer(s)			
Effective Date	02/04	**Review Frequency**	Annual
Approval Date	04/15/2021		

Scope of Policy/Procedure ***(applies to entities/locations marked below)***					
	This document applies to **all** entities/locations listed below				
Hospitals		**Ambulatory/Off-Campus locations**		**Other Carle Entities**	
	All Carle Hospitals listed below:		All Carle ambulatory/off-campus locations listed below:		All other Carle entities listed below:
X	Urbana (CFH)	X	CFH/CPG ambulatory locations *(also includes Home Health, Therapy Services, Medical Supply, Danville Surgicenter, Specialty Pharmacy)*	X	Arrow Ambulance, LLC
X	Carle Hoopeston Regional Health Center (CHRHC)	X	CHRHC ambulatory locations *(includes, CARMC, Cissna Park, Danv-Fairchild, Mattoon-Hurst, Milford, Rossville, Tuscola, Watseka)*	X	Carle Retirement Centers *(Windsor of Savoy & Windsor Court)*
X	Carle Richland Memorial Hospital (CRMH)	X	Champaign SurgiCenter, LLC		Health Alliance Medical Plans
X	Carle Eureka Hospital (CEH)	X	Administration Building locations (includes Carle at the Fields)		FCC – FirstCarolinaCare Insurance Co.
X	Carle BroMenn Medical Center (CBMC)	X	Carle West Physician Group (CWPG)	X	CHPP—Carle Health Physician Partners
		X	CRMH Ambulatory locations (includes Bridgeport, Newton, West Salem, Olney, Specialty Services)		
	Scope Exclusions *(Mark this box and enter any departments or locations within a marked entity that are exempt from the policy/procedure.)*				

Attachments N/A

Purpose

A. To set forth the duty of all Foundation employees to report compliance violations, the primary reporting methodologies available to do so, and the Foundation's policy on protecting those who make such reports.

Definitions N/A

Statement of Policy

A. Reporting

1. Every employee of Carle Health and its affiliates and subsidiaries has a duty to immediately report any activity that he/she believes in good faith is, or may be, a violation of Carle Health's Corporate Compliance Program, the Standards of Conduct, policies, or any law or regulation with which Carle Health or any of its affiliates must comply.
   a. Good faith reporting is an expected, accepted and protected behavior.
   b. The failure of an employee, who has actual knowledge[1] of a clear violation, to report such violation is itself a violation of this policy.
   c. Any employee who is uncertain whether a questionable activity is reportable should ask his/her supervisor or seek clarification from another resource (such as a higher level manager, the Chief Risk and Corporate Integrity Officer or Corporate Compliance department staff).
2. Potential compliance violations should be reported through proper channels. These channels include an employee's immediate supervisor, a higher level manager, the Human Resource Department, the Chief Risk and

Printed copies are uncontrolled documents. Refer to the intranet for the most current version.

Corporate Integrity Officer, Corporate Compliance department staff or the Carle Compliance AlertLine (AlertLine) at 1-888-309-1566.

- The AlertLine is answered by a representative from a third party, and is available 24 hours a day, seven days a week for reporting concerns.
- Callers can remain anonymous by not reporting their name or contact info when making a report.

3. Any supervisor, manager, director or other resource receiving a report of a possible compliance violation should immediately notify the Corporate Compliance department. That individual should also follow up with the employee who submitted the report, providing feedback and confirmation that the issue has been raised with compliance or otherwise addressed.
4. In making a report of a potential compliance violation, employees should provide factual information so their concern can be addressed.
5. All reports made to the Corporate Compliance department and/or the AlertLine are confidential. No information about an employee who reports a compliance concern will be disclosed, if that is his/her preference, up to the limits of the law. ("Up to the limits of the law" means that in certain situations Carle Health may be required to report actual violations of law, and must also cooperate with legitimate government investigations which could ultimately compromise a caller's identity.)
6. All substantive concerns reported will be investigated confidentially under the direction of the Chief Risk and Corporate Integrity Officer and Carle Health's legal counsel, when appropriate. Refer to AD504 - Internal Compliance Investigations for further information about the conduct of investigations into reported compliance violations.
7. Entities contracted with Carle Health such as third-party payors may require that substantiated allegations of fraudulent activity committed by individuals serving their patients and information related to an individual's exclusion from participating in federal or state healthcare programs be reported to the entity. If Carle Health is aware of any such activity, the Corporate Compliance department will make a good faith effort to report such activity to the entity's compliance contact.

B. Non-Retaliation

1. It is Carle Health's policy that no employee will be subjected to retaliation, retribution, harassment, intimidation or other penalty of any kind for his/her good faith reporting of any compliance concern. Non-retaliation also applies to an employee opposing an act or practice that the person believes in good faith violates HIPAA and/or assisting in an investigation conducted by HHS or other appropriate authority.
   a. Conduct intended to retaliate against an employee for making a good faith report, to coerce an employee to make a false report or to intimidate an employee from making a good faith report is itself a violation of this policy.
   b. Any conduct intended to influence by coercion, retaliation, intimidation, reward or otherwise, the testimony or evidence that any actual or potential witness may provide in a compliance investigation, is a violation of this policy.
   c. Any employee who feels he/she may be the subject of any retaliation, retribution, harassment, penalty, coercion, intimidation, or attempt at influence as a result of reporting a compliance concern should immediately contact the Chief Risk and Corporate Integrity Officer at 1-217-902-5390.
   d. Employees cannot exempt themselves from the consequences of their own wrongdoing or inadequate performance by reporting it. However, prompt disclosure of an error by an employee, even if the error involves wrongdoing or inadequate performance, will generally be considered a constructive action by the employee.
   e. Whistleblowers under state or federal False Claims Acts are protected by law from retaliation in any form as the result of their whistleblowing. Whistleblowers are entitled to be awarded all relief necessary to make the person whole including reinstatement, back pay and other damages.

Procedure N/A

Other Related Links N/A

References

AD522 - False Claims Acts and Whistleblower Protection

Electronic Approval on File

Laurence J. Fallon
Executive Vice President and Chief Legal Officer

[1]A person is considered to act “knowingly” if they have actual knowledge that information is false, or if they deliberately ignore or recklessly disregard the truth. Furthermore, it is also a violation to commit any of the above forms of fraud against any federal healthcare program contractor, carrier, or intermediary.

Printed copies are uncontrolled documents. Refer to the intranet for the most current version.