



POLICY TYPE:

Corporate

Divisional

EFFECTIVE DATE:

5/13/14

INITIAL APPROVAL DATE:

May 13, 2014

NEXT REVIEW DATE:

May 2017

POLICY NUMBER:

5528

REVISION APPROVAL DATE: 5/14, 11/14, 4/15, 4/16

APPLIES TO PRODUCT TYPE:

Medi-Cal  CMC

PAGE:

1 of 2

POLICY APPLIES TO:

All Divisions and Departments

CLASSIFICATION SERIES:

Compliance

SUBJECT:

## Non-Retaliation Whistle Blowing Policy

### Policy:

Retaliation is prohibited against any employee who in good faith reports violations of state or federal law, regulations, or rules or who reports noncompliance with a state or federal rule (including reports of FWA or reports under the False Claims Act) or who participates in good faith in CHG's compliance program. Participation in CHG's compliance program may include participating in the investigation of the issues of noncompliance, CHG's conduct of self-evaluation or audits of the compliance program, remedial actions, and/or reporting to appropriate government authorities. Additionally, employees who refuse to participate in illegal activity or activity that would result in a violation of or noncompliance with a state or federal statute, regulation, rule, or who have exercised whistle blower rights in former employment will not be retaliated against in their employment with Community Health Group. Retaliation against any such employee is prohibited.

### Purpose:

To protect employees from retaliation for reporting violations of law, rule or regulation

Any employee who believes there is or has been a violation or noncompliance with applicable state or federal laws, regulations or rules, may report such belief on the California Whistle Blower Hotline at 800-952-5225.

### Procedure:

1. An employee who has made a whistleblower complaint and who believes that he/she is suffering retaliation shall immediately report the concern to the Human Resources Department.
2. The Human Resources Department shall ensure that a prompt and thorough investigation is conducted and that the results of that investigation and any corrective action needed will be communicated to the complainant and other appropriate parties. The Human Resources Department shall continue to monitor the situation and consult with the complainant for at least six months following the complaint.



POLICY NUMBER:  
5528

CLASSIFICATION SERIES:  
**Compliance**

PAGE:  
2 of 2

Access Privileges:  All  \_\_\_\_\_

Regulatory: A. 2 C.F.R. §§ 422.503(b)(4)(vi)(F), 423.504(b)(4)(vi)(F)  
B. Prescription Drug Benefit Manual, Chapter 9 - Compliance Program Guidelines - Rev. 16, 01-1173 and Medicare Managed Care Manual; Chapter 21 - Compliance Program Guidelines - Rev. 110, 1/11/13

NCQA:

Attachments: None

Policy Status:  Signed (Signature on File)  Active Draft  Policy in Development

Approved By: Signature: \_\_\_\_\_

Department Head: \_\_\_\_\_ Chief Compliance & Regulatory Affairs Officer

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Division Chief: \_\_\_\_\_ Chief Executive Officer

Date: \_\_\_\_\_