

Policy and Procedure	
SUBJECT: Non-Intimidation and Non-Retaliation	DEPARTMENT: Regulatory Compliance, Risk Management and Government Affairs
ORIGINAL EFFECTIVE DATE: 01/11	DATE(S) REVIEWED/REVISED: 01/11, 4/12, 03/14, 12/15, 09/16, 12/17, 09/18, 05/19, 04/20, 04/21, 06/22
APPROVED BY: Chief Compliance and Risk Officer	NUMBER: RA 63 PAGE: 1 of 2

SCOPE:

Providence Health Plan, Providence Health Assurance, Providence Plan Partners, and Ayin Health Solutions as applicable (referred to individually as “Company” and collectively as “Companies”).

APPLIES TO:

<u>Fully Insured</u>						
<u>Individual</u>	<u>Small Group</u>	<u>Large Group</u>	<u>Self-Insured</u>	<u>Medicare</u>	<u>Medicaid</u>	<u>Ayin</u>
<input type="checkbox"/> Oregon On Exchange	<input type="checkbox"/> Oregon On Exchange (SHOP)	<input type="checkbox"/> Oregon	<input type="checkbox"/> ASO	<input type="checkbox"/> Medicare	<input type="checkbox"/> Medicaid	<input type="checkbox"/> YCCO
<input type="checkbox"/> Oregon Off Exchange	<input type="checkbox"/> Oregon Off Exchange (SHOP)	<input type="checkbox"/> Washington				<input type="checkbox"/> WHA
<input type="checkbox"/> Washington On Exchange						<input type="checkbox"/> TPA
<input type="checkbox"/> Washington Off Exchange						<input type="checkbox"/> PBM
<input checked="" type="checkbox"/> APPLIES TO ALL ABOVE LINES OF BUSINESS						

POLICY:

The Company maintains policies that emphasize confidentiality, anonymity, and non-retaliation for compliance related questions, or reports of potential non-compliance. Company caregivers, Delegated Entities, and FDRs are protected from retaliation and harassment as a result of having reported a compliance or integrity concern.

PROCEDURE:

The Medicare Compliance Officer, the Medicaid Program Director and/or Director of Commercial Compliance and Regulatory will receive any reports of potential non-compliance for their respective lines of business. Compliance and integrity concerns or potential concerns can be reported via the

