

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
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"/> TPA			<input type="checkbox"/> WHA
<input type="checkbox"/> Washington On Exchange						
<input type="checkbox"/> Washington Off Exchange						
<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

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Regulatory Compliance, Risk Management and Government Affairs (RCRMGA) intranet page, Integrity Hotline, in writing, or directly to the Chief Compliance and Risk Officer/Privacy Officer, Medicare Compliance Officer, the Medicaid Program Director and/or the Director of Commercial Compliance and Regulatory. This ensures that communication can be confidential and accessible to all caregivers and allows for compliance issues to be reported anonymously and in good faith.

See policy RA 60 for procedures on reporting a compliance concern.

REFERENCES:

42 CFR §422.503(b)(4)(vi) and §423.504(b)(4)(vi), Chapter 9 of the Medicare Prescription Drug Manual, Chapter 21 of the Medicare Managed Care Manual, Compliance Program Guidelines, Providence St Joseph Health Policy PSJH-RIS-733, Providence Compliance Program.