POLICY PURPOSE

Troy Health, Inc. is committed to comply with the requirement establish and implement effective lines of communication, ensuring confidentiality between the compliance officer, members of the compliance committee, employees, the Board of Directors, and all first-tier, downstream, and related entities (FDRs).

The purpose of this policy is to describe the communication methods accessible to allow compliance issues and potential FWA to be reported, including a method for anonymous and confidential reporting in good faith.

SCOPE

This policy applies to all employees, Board of Directors, and FDRs.

REFERENCES

- 42 CFR 422.503(b)(4)(vi)(D)
- Medicare Managed Care Manual, Chapter 21, Section 50.4

RESPONSIBLE PARTIES

- Chief Compliance Officer

DEFINITIONS

- First-tier, downstream, and related entities (FDRs) – contracted companies to perform health plan operations or health care services.
- Fraud, waste, and abuse (FWA) – violations of the use of health care dollars and resources.
POLICY

Troy Health, Inc. has established ways for the Chief Compliance Officer to communicate information to others, and employees, Board of Directors, and FDRs can communicate to the Chief Compliance Officer. To build on this communication platform, the Compliance staff promotes the idea of open lines of communication and provides all employees with the opportunity to ask questions, report problems, or share concerns.

Compliance staff regularly distribute HPMS memos and regulatory releases with the appropriate leadership over operational areas and then the leaders share with FDRs. Tasks associated with those releases are tracked and followed-up on to ensure all required actions are completed within the timeframe allowed.

The Chief Compliance Officer shares other educational information to employees through the monthly distribution of the Compliance Newsletter. These communications strengthen concepts learned and remind the workforce about reporting issues and non-retaliation policies.

The Ethics hotline at 1-844-977-0475 is available for others to communicate to the Chief Compliance Officer of potential compliance issues or fraud, waste, or abuse. The Ethics web portal may also be used. Reported issues can be made anonymously. All reported issues are kept confidential, except when required to be disclosed by law. Others may also report issues to Compliance by sending an email to the Compliance email address or contact the Chief Compliance officer directly.

The Chief Compliance Officer communicates compliance issues directly with the Chief Executive Officer (CEO), the Compliance Committee, and the Board of Directors.

Good faith reporting is important to Troy Health, so anyone that reports compliance or potential FWA issues are protected by the non-retaliation policy.

PROCEDURE

All allegations of non-compliance and potential FWA are always investigated thoroughly.

- Find source(s) of the non-compliance/FWA
- Apply root cause analysis procedures
- Request corrective actions of the root cause and implement controls and monitoring.
- Confirm corrective actions were effective

Investigated compliance/FWA issues are reported, confidentially, to the CEO, the Compliance Committee, and the Board of Directors.
ATTACHMENTS/RELATED POLICIES/STANDARD OPERATING PROCEDURES

- None

APPROVALS

Sally A. Scott

Chief Compliance Officer

10 / 26 / 2022

Date: