POLICY PURPOSE

Troy Health, Inc. is committed to promoting disciplinary standards that are well-publicized to encourage good faith participation in the compliance program.

The purpose of this policy is to describe the expectations for employees to identify non-compliance and unethical behavior, report compliance issues and potential fraud, waste, and abuse, and to report these problems with an expectation of confidentiality and protections from retaliation.

SCOPE

This policy applies to all employees.

REFERENCES

- 42 C.F.R. §§ 422.503(b)(4)(vi)(E)
- Medicare Managed Care Manual, Chapter 21, Section 50.5

RESPONSIBLE PARTIES

- Chief Compliance Officer

DEFINITIONS

- Retaliation – punishment of an employee by an employer or supervisor for engaging in legally protected activity, such as reporting non-compliance, participation in a workplace investigation, or making a complaint to a government body. Retaliation can include any negative action, such as demotion, discipline, termination, salary reduction, or shift reassignment.
POLICY

As part of an effective compliance program, Troy Health must have well-publicized disciplinary standards outlined in the Code of Conduct and through Compliance policy. The Chief Compliance Officer is responsible for ensuring these standards are also promoted through other mechanisms, such as newsletters, posters, general compliance training, communications with First-tier, Downstream, and Related Entities (FDRs), and during operational area meetings.

Troy Health requires employees to participate in required training; cooperate during internal investigations; report non-compliance, potential FWA, unethical conduct, illegal behavior, and an employee’s resistance to cooperate with corrective actions.

If non-compliant or unethical conduct is found, timely, consistent, and effective enforcement will be implemented. Enforcement may include HR actions, up to and including, termination. The disciplinary action will be appropriate to the severity of the violation. Records of enforcement will be retained for a period of ten (10) years as required.

The Chief Compliance Officer is responsible for ensuring retaliatory actions are not taken and the reporting employee(s) are protected.

PROCEDURE

1. Chief Compliance Officer will investigate a reported issue, interview the employees involved, and gather information.

2. If enforcement actions may be required, the Chief Compliance Officer brings in Human Resources (HR) to interview and determine culpability.

3. If disciplinary action is required, based on the violation and severity, HR will capture and retain case information for 10 years:
   a. date of violation reported
   b. description of violation
   c. date(s) of investigation
   d. summary of findings
   e. disciplinary action taken
   f. date disciplinary action taken

4. The Chief Compliance Officer will review the disciplinary actions taken to ensure it was appropriate, fair, consistent, and imposed within a reasonable timeframe.

ATTACHMENTS/RELATED POLICIES/STANDARD OPERATING PROCEDURES

- None

APPROVALS
Sally A. Scott

Chief Compliance Officer

08 / 31 / 2022

Date: