

MHN Enterprise Policy

EC.007 – REPORTING COMPLIANCE ISSUES

SECTION:	ETHICS AND COMPLIANCE	LAST REVISION DATE:	10.17.2022
SUBJECT:	Reporting Compliance Issues	LAST REVIEW DATE:	10.17.2022
POLICY NUMBER:	EC.007	APPROVED BY:	ERMC – Policy & Procedure Subcommittee

I. PURPOSE

To provide a mechanism for our workforce members to report any known or suspected violations of laws, regulations, contract terms or MHN¹ policies and procedures, including a mechanism for anonymous reporting.

II. POLICY

MHN is committed to complying with all applicable laws and regulations, including those intended to prevent and deter fraud, waste and abuse. Our goal is to create a climate that discourages improper conduct and facilitates open communication regarding any compliance concerns or questions. If any workforce member has knowledge of, or in good faith suspects, any wrongdoing involving potential violations of law or Company policies, they must promptly report those concerns so that an investigation can be conducted and appropriate action taken. We understand that suspicions of impropriety are sometimes based on incomplete or inaccurate information. To prevent misunderstandings, we encourage all workforce members to immediately raise any concerns using internal channels.

Workforce members may be reluctant to discuss potential improprieties or actual wrongdoing because they fear retaliation. We are firmly committed to encouraging open lines of communication in an environment free of reprisal or retaliation for reports made in good faith.

III. PROCEDURAL GUIDELINES

- A. If at any time an MHN workforce member becomes aware of or suspects illegal or unethical conduct or a violation of Company policies by another employee, a board member, vendor, contractor, Portal Participant or volunteer, the workforce member **must** report it immediately to an appropriate individual. Please note that employees are required to report such suspected illegal or unethical conduct or policy violation as soon as feasible.
- B. Reports may be made to the Chief Compliance Officer, members of the management team, or our legal counsel. Reports may also be made by using a toll free Ethics & Compliance Hotline using one of the following methods:
 - Phone: 1.800.401.8004
 - Website: <http://www.lighthouse-services.com/mhnchicago>
 - E-mail: reports@lighthouse-services.com (must include company name with report) Fax: (215) 689-3885 (must include company name with report)

¹ MHN Enterprise Policies are consistent among Medical Home Network and its affiliates, including but not limited to MoreCare and MHN REACH ACO. A reference to MHN in this policy includes MHN and all MHN subsidiaries, unless expressly superseded by a subsidiary-specific policy.

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Reports using these methods may be made anonymously.

- C. When a report is received, an appropriate person (the Compliance Officer, outside counsel, etc.) will promptly and impartially conduct an investigation into the allegations to determine the nature, scope, and duration of wrongdoing, if any. Employees are expected and required to cooperate fully with any such investigation. This includes participating in requested interviews, obtaining and providing requested documents or other evidence and maintaining the confidentiality of any information requested or provided. An employee's failure to cooperate will be considered a violation of this policy.
- D. If an allegation of fraud, abuse, or financial misconduct is made that impacts any upstream contracts, MHN will notify the affected Entity and manage any investigation in accordance with applicable contract requirements. Please contact legal counsel or the Contract & Compliance Manager for specific contract requirements.
- E. If an allegation is substantiated, a plan for corrective action will be developed. Appropriate corrective action may include restitution of any overpayment amounts, notifying an appropriate governmental agency, disciplinary action, sanctions in accordance with HIM.002 – Sanctions, and making changes to policies and procedures to prevent future occurrences of the misconduct.
- F. Retaliation in any form against anyone who makes a good faith report of wrongdoing or cooperates in an investigation is strictly prohibited.

IV. FORMS

V. RELATED POLICIES

- EC.001 - Code of Business Conduct and Ethics
- EC.008 - Non-Retaliation Policy
- EC.010 - Internal Handling of Hotline Calls
- HIM.002 - Sanctions

VI. REFERENCES AND ACCREDITATION AUTHORITIES

- United States Sentencing Commission, Guidelines Manual, §8B2.1 ("Effective Compliance and Ethics Program) (Nov. 2018), available at: https://www.ussc.gov/guidelines/2018-guidelines-manual%20http://www.ussc.gov/Guidelines/2012_Guidelines/Manual_PDF/2012_Guidelines_Manual_Full.pdf
- Basic Compliance Program resources available on the HHS OIG website: <https://oig.hhs.gov/compliance/101/index.asp>
- Compliance Program Guidance, available at:

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- <https://oig.hhs.gov/compliance/compliance-guidance/index.asp>

VII. REVIEW STATEMENT

MHN will maintain the status of this activity and conduct audits as appropriate to ensure compliance. This policy will be reviewed every two years or in timely response to changes in local or federal regulations. Modifications to the policy will be made as needed.

VIII. REVIEW HISTORY

Approved

July 31, 2013

Reviewed

September 18, 2015

May 18, 2016

September 30, 2019

October 17, 2022