

MEDICAL HOME NETWORK REACH ACO, LLC
("MHN REACH ACO")
Compliance Policies and Procedures

SECTION:	Ethics and Compliance	LAST REVISION DATE:	N/A
SUBJECT:	Compliance Reporting	LAST REVIEW DATE:	09.27.2022
POLICY NUMBER:	MRA.EC.007	APPROVED BY:	ERMC-Policy & Procedure Subcommittee

I. POLICY

It is the policy of the MHN REACH ACO to maintain a mechanism for all ACO Related Individuals and Beneficiaries to report potential compliance concerns related to the operations of the ACO to the Compliance Officer. These mechanisms include (1) Reporting Directly to the Compliance Officer, (2) Reporting through ACO Supervisory Channels, and (3) Anonymous Reporting through the ACO Compliance Reporting Tool.

II. PROCEDURAL GUIDELINES

1. The ACO utilizes three methods to allow ACO Related Individuals and Beneficiaries to report potential concerns to the Compliance Officer:
 - a. ACO Related Individuals are instructed that the Compliance Officer is available to receive any reports regarding potential compliance issues on a confidential basis. These reports may be made in person or by calling or emailing the Compliance officer directly. Where possible, the Compliance Officer will maintain the confidentiality of the individual making the report. If it is not possible to maintain confidentiality, the Compliance Officer will inform the reporter of the reason for sharing and the extent to which their information will need to be shared.
 - b. If they prefer, ACO Related Individuals are also able to contact their immediate supervisor when non-compliant activity is suspected. This report should be made immediately upon identifying the issue. The supervisor will report this to the Compliance Officer for further investigation and reporting to the ACO Compliance Committee and Board of Managers as appropriate. If the individual feels as though their immediate supervisor did not adequately address the complaint, they may still go directly to the Compliance Officer or report via any of the other reporting methods.
 - c. Anonymous reporting is available through the ethics and compliance hotline Lighthouse. ACO related individuals are able to submit an anonymous report through the Lighthouse portal : <http://www.lighthouse-services.com/mhnchicago>, by calling the toll free telephone line **800-401-8004** or by emailing the report to: reports@lighthouse-services.com (must include company name with report) or via Fax: (215) 689-3885 (must include company name with report). Reporting may also be made directly to the Compliance Officer at ACO_Compliance@mhnchicago.org.

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2. Communication of Options: All ACO Related Individuals are notified of these options upon hire or contracting and annually as part of the ACO Compliance Training.
3. In accordance with the ACO's Policy Non-Retaliation, no individual who makes a report in good faith will be retaliated against.
4. The Compliance Officer will be responsible for conducting any appropriate or necessary investigation or follow-up based on reporting through any of the methods listed in this policy and in accordance with investigations and follow-up activities policies.

III. FORMS

None

IV. REFERENCES AND ACCREDITATION AUTHORITIES

ACO REACH Model Participation Agreement

V. REVIEW STATEMENT

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

VI. CHANGE HISTORY