

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

SECTION:	Ethics and Compliance	LAST REVISION DATE:	N/A
SUBJECT:	<b>Non-Retaliation</b>	LAST REVIEW DATE:	09.27.2022
POLICY NUMBER:	MRA.EC.008	APPROVED BY:	ERMC-Policy & Procedure Subcommittee

**I. POLICY**

It is the policy of the MHN REACH ACO (the ACO) to ensure that all ACO Related Individuals and Beneficiaries have the ability to report any potential compliance concerns without fear of retaliation.

**II. PROCEDURAL GUIDELINES**

1. The ACO and all ACO Related Individuals shall in no way impede, prohibit, or dissuade any individual from reporting a suspected issue of non-compliance.
2. When an individual has made a report (internally or externally) of an activity, practice, or arrangement that the individual in good faith believes violates, or may violate laws or regulations, the ACO's Policies and Procedures, or other applicable ACO requirements:
  - a. The ACO and all ACO Related Individuals shall not retaliate or engage in retribution (including discharge, demotion, suspension, denial of promotion, or discrimination) against, or otherwise harass, the individual for making a report, provided such report was made in good faith and the individual was not involved in the misconduct at issue.
  - b. Any ACO Related Individual who is involved in any act of retaliation, retribution, or any form of harassment – either committing the act or condoning it – against a person who reports a compliance concern will be subject to disciplinary action, up to and including termination of employment or contract with the ACO.
3. Notwithstanding the above, the ACO shall take appropriate corrective and/or disciplinary action against any individual who violates any Policies and Procedures, or applicable laws or regulations, regardless of whether that individual reported such violation.
  - a. When appropriate, self-reporting may be a mitigating factor in determining the severity of any disciplinary action.

An individual may be subject to corrective and/or disciplinary action if it is determined that the report of wrongdoing or suspected Compliance Program violation was not made in good faith (e.g., was knowingly fabricated, distorted, exaggerated, or minimized in order to injure someone else, protect himself/herself, or for any other reason).

- a. Any ACO Related Individual who misuses the ACO's Compliance Reporting Tool or attempts to interfere with efforts to investigate or address a possible compliance issue is subject to corrective and/or disciplinary action, up to and including termination of

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employment or contract with the ACO.

4. ACO Related Individuals and Beneficiaries are encouraged to come forward if they feel they are being retaliated against. This is expressed during new hire Compliance Training, and annually thereafter, and noted on the website for the ACO's Compliance Reporting Tool.

**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**