

	Department: Corporate Compliance	Policy No.: 103
	<b>TITLE: VOLUNTARY REPORTING MECHANISMS</b>	
Effective Date: 1/1/15	Revised: 1/1/15	

## **VOLUNTARY REPORTING MECHANISMS**

### **SCOPE:**

All Ascension At Home, LLC colleagues. For purposes of this policy, all references to “colleague” or “colleagues” include temporary, part-time and full-time associates, independent contractors, clinicians, officers and directors.

### **PURPOSE:**

To allow Ascension At Home, LLC and its subsidiaries’ (the “Company”) colleagues and clients to confidentially report or question any matter that may be unprofessional, unethical, illegal or potentially non-compliant without fear of retaliation.

### **POLICY:**

The Company has established a Confidential Disclosure Program enabling colleagues to disclose any practices or procedures that the colleague or client believes may be inappropriate. These disclosures will remain confidential, and, to the extent that labor laws and human resource regulations allow, no one will know of the issue except the Ethics & Compliance Department, Legal Department and Human Resources Department, as appropriate. These issues may relate to possible Medicare and Medicaid Fraud or Abuse; federal, state or local laws or regulations; or Company policies and procedures. The Company requires the internal review of any such disclosure and will ensure that proper follow-up is conducted. If a colleague or client has a question or requires a return phone call to provide further information, he/she will be contacted within two (2) business days of placing the inquiry or report.

### **PROCEDURE:**

- The Company will post, in a prominent place accessible to each colleague, a notice detailing its commitment to comply with all applicable Medicare and Medicaid laws and regulations in the conduct of its business. The phone number for the Ethics & Integrity Helpline will be disclosed in this notice. Contact the Ethics & Compliance Department to obtain additional Helpline Notices.
- The Chief Compliance Officer is responsible for and monitors the Confidential Disclosure Program. The caller/author is encouraged to provide as much information as possible to assist with the investigation including dates, locations, and a detailed description of the incident or issue.

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- The Company takes all reports of non-compliance seriously. Reports may be made in one of four ways:
  1. Through the Ethics and Integrity Helpline at 877-835-5267.
  2. In person, through contact with a supervisor, Human Resources, the Chief Compliance Officer, or other Ethics & Compliance Department colleague.
  3. By e-mail, to [complianceconcerns@evhc.net](mailto:complianceconcerns@evhc.net).
  4. In writing, to the Chief Compliance Officer at:

Chief Compliance Officer  
6200 South Syracuse Way, Suite 200  
Greenwood Village, CO 80111

- It is the Company’s policy that a colleague will be subject to disciplinary action if the Company reasonably concludes that the colleague knowingly fabricated, distorted, exaggerated or minimized a report for any reason.
- It is the Chief Compliance Officer’s or designee’s responsibility to document, respond to and investigate each call, e-mail, letter or personal contact. If a colleague or client has a question or requires a return phone call to provide further information, this individual will be contacted within two (2) business days of placing the report.
- In some cases, it will be difficult to investigate without using the name of the caller. In these instances, the caller will be asked about having his or her name disclosed. If the caller does not wish to provide his or her name, the difficulties in investigating without disclosing the name should be explained. However, in all instances, the wishes of the caller will be respected.
- The Chief Compliance Officer reports disclosure activity and the status of investigations to the Compliance Committee quarterly. The Chief Compliance Officer maintains a log documenting each verbal or written disclosure. The log documents the following:
  1. Name of caller or “anonymous.”
  2. Contact phone number.
  3. Date report received.
  4. Nature of the call.
  5. Method of disclosure.
  6. Location of incident.
  7. Action to be taken.
  8. Dates resolved and type of resolution.

The Chief Compliance Officer will be responsible for developing a notice detailing the Company’s commitment to comply with all applicable Medicare and Medicaid laws and

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regulations in the conduct of its business. The Ethics and Integrity Helpline phone number will be disclosed in this notice. The Ethics & Compliance Department will distribute these notices to Regional Presidents, whom will be responsible for displaying the notices in a prominent place accessible to each colleague at the corporate and regional offices.