

THE CENTER FOR DISCOVERY

SUBJECT: Protocol for the Office of People Operations

MANUAL: Corporate Compliance

SECTION: Section 4

Purpose:

To clarify the respective roles and responsibilities of the Corporate Compliance Officer (CCO) and the Office of People Operations in dealing with compliance-related issues. A primary purpose of the Corporate Compliance program is to provide employees with an alternative communication channel to report and resolve problems and concerns. Employees are encouraged to utilize “traditional” reporting and resolution channels such as the chain of command and Office of People Operations; however, they also have the option of contacting the CCO by calling directly or via the Corporate Compliance Hotline.

It is anticipated that employees may report People Operations issues to the Compliance office, and conversely, compliance concerns may be reported to the Office of People Operations. Therefore, it is critical for the Compliance office and the Office of People Operations to establish a policy of open communication each time an issue is raised to one department that may be the responsibility of the other department. The CCO and the Chief of People Operations will coordinate any appropriate investigative and resolution efforts.

Policy:

1. The CCO and the Director of People Operations will maintain open communications and establish reciprocal reporting obligations for the purpose of ensuring the appropriate department is apprised of issues that are its primary concern.
2. The CCO and the Director of People Operations will coordinate investigative and resolution activities to avoid unnecessary duplication of efforts.

Procedures:

1. Any employee who raises an issue through the Corporate Compliance program, whether by direct contact or through the hotline, will be protected from retribution or retaliation.
2. If an issue is raised to the Office of People Operations that includes or may include any of the following subject areas, a report of such issue should be forwarded to the QI/CC Department within 24 hours of receipt:
 - Billing/coding
 - Kickbacks, bribes
 - Conflicts of interest
 - Medical records documentation
 - Contracts/agreements
 - Abuse of people served
 - Cost reports
 - Confidentiality
 - Embezzlement/theft

ORIGINAL DATE: 2/2012

SUPERSEDES: N/A

REVISION: 2

DATE: 6/1/2018
10/2014

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- Paying for referrals
 - False expense reports, vouchers, etc.
 - Quality of care
 - Fraud/False Claims
 - Retaliation or retribution
 - Safety, health, or environment
3. If an issue is raised to the QI/CC Department that includes or may include any of the following subject areas, a report of such issue should be forwarded to the Office of People Operations within 24 hours of receipt:
- Adverse working conditions
 - Wrongful discharge
 - Uncivil behavior
 - HRM violations (e.g., ERISA, Fair Employment act, FMLA, etc.)
 - Alcohol/drug abuse
 - Discrimination
 - Retribution/retaliation
 - Hiring of unqualified persons
 - Sexual abuse/harassment (employees)
 - False cost reports, vouchers, etc.
 - Unfair treatment
 - Violent, disrupting, or threatening behavior
4. Should an issue be referred from one department to the other, the two departments will coordinate investigative efforts. Findings and recommendations will be shared between the two departments when appropriate (eg. the need for disciplinary action will be referred to the Office of People Operations. The need to pay back funds will be referred to Corporate Compliance).
5. The CCO and the Vice President of People Operations will meet quarterly prior to the meeting of the Board Governance and Corporate Compliance Committee meeting to discuss particular cases if needed, coordinate efforts and resolve any issues.
6. The Office of People Operations will ensure that all agency job descriptions and performance evaluations include employee responsibilities in corporate compliance.

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