

THE CENTER FOR DISCOVERY

SUBJECT: Disclosure of Misconduct

MANUAL: Corporate Compliance

SECTION: Section 7

Purpose:

To identify any misconduct that could constitute a violation of criminal, civil, or administrative law and, if found to be an actual violation, to take steps to address the misconduct. To establish a process within the structure of the Corporate Compliance program to address potential or actual misconduct, including voluntary disclosure to the appropriate law enforcement or regulatory agency.

Policy:

1. Employees, contractors, or vendors should report any potential violations of federal, state, or local laws or regulations to their immediate supervisor and/or to the Corporate Compliance Officer (CCO).
2. If misconduct is reported or detected, the Center for Discovery will determine, via investigation, if credible evidence exists to indicate that a violation of criminal, civil, or administrative law has occurred.
3. If the Center for Discovery determines that credible evidence of a legal violation exists, it will respond to the offense by developing a corrective action initiative and, if deemed necessary, disclosing the misconduct to the appropriate third-party law enforcement or regulatory agency.
4. The Center for Discovery's legal counsel will notify OMIG in writing within 30 days of the date of discovery, of any ongoing investigation or legal proceeding conducted or brought by a governmental entity or its agents involving an allegation that the organization has committed a crime or has engaged in fraudulent activities or any other knowing misconduct.
5. The Center for Discovery's legal counsel will notify OMIG in writing, within 30 days, if, after reasonable investigation, the Center for Discovery discovers credible evidence of misconduct that may violate criminal, civil, or administrative law concerning the Center's practices.
6. Any investigations will be conducted in an expeditious manner to ensure that all required reporting is accomplished in accordance with any legal or regulatory guidelines.

Procedures:

1. Anyone with knowledge of a potential violation of law or regulation, particularly a situation that may require return of prior payments, shall either report that information to his/her immediate supervisor, who, in turn, will report the matter to the CCO, or directly to the CCO.

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2. The CCO will determine what further investigation is required, such as auditing or monitoring of the situation, or additional training of personnel, or the rebilling or refunding of a claim. The CCO will also make arrangements for the appropriate actions/procedures to take place.

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