

6003-Q ANTI-RETALIATION

EFFECTIVE DATE: September 8, 2021

REFERENCES: A.R.S. 36-2992, A.R.S 36-2918.01

PURPOSE

To protect employees who report compliance issues in good faith.

POLICY

- A. This Policy protects against retaliation or retribution for reporting a compliance concern in good faith or cooperating with a compliance investigation with good intentions.
- B. This Policy ensures that no one is penalized for reporting what is honestly believed to be a compliance problem or for honestly participating in a compliance investigation.
 - 1. Someone who purposely falsifies or misrepresents a report or makes false statements shall not be protected under this Policy.
 - 2. False accusations or statements made in a report or during an investigation, including those made with the intent of harming or retaliating against another person, may result in disciplinary action, up to and including termination.
- C. Although the Division has a policy that does not permit retaliation for reporting or cooperating in good faith, it is important to understand that no policy can protect you from applicable consequences if you have broken the law or violated our policies. Breaking the law or violating the Division's policies may result in disciplinary action, up to and including termination, as well as possible state and federal actions and penalties.
- D. The Division is required by law to report certain compliance issues to state or federal agencies. When this is the case, the Division Compliance Officer will conduct an evaluation of the issue in terms of state or federal reporting requirements and will notify the appropriate state or federal agencies on behalf of [Facility Name] when applicable.
- E. The Division is committed to correcting wrongdoing, whether intentional or inadvertent, wherever it may occur in the Division, and to cooperating fully with government investigations.
- F. Employees are permitted to report on matters anonymously. Matters reported through the Corporate Compliance Program Integrity Hotline or other communication sources that suggest substantial violations of compliance policies or federal healthcare program statutes will be documented and investigated promptly to determine their validity.
- G. The Compliance Officer will review personnel records and information periodically to make sure that those who report suspected misconduct are not the victims of retaliation or other improper conduct. In addition, the Compliance Officer may keep confidential the names of any Division employee(s) who report information, when important.