


<p><b>DEPARTMENT:</b> Compliance</p> <p><b>POLICY TITLE:</b> CMP06 Whistleblower Protection</p>	 <p>Arizona Priority Care™</p> <p><i>One Goal. One Priority. Your Healthcare.</i></p>	
<p><b>REVIEWED BY:</b> AZPC Compliance Officer</p>	<p><b>REVIEW DATE:</b> 11/08/2019</p>	<p><b>EFFECTIVE DATE:</b> 12/01/2019</p>
<p><b>APPROVED BY:</b> Compliance Committee</p>	<p><b>APPROVAL DATE:</b> 11/11/2019</p>	

**PURPOSE:**

To ensure that Arizona Priority Care (AZPC) encourage all employees, business associates, FDRs, and enrollees/members to report any suspected concerns of non-compliance; and to safeguard them against retaliation from good faith reporting.

**POLICY:**

It is AZPC’s policy, in accordance with state and federal laws and regulations, and health plan contractual requirements, to provide clear notification to employees that there will be no retaliatory action or negative employment consequences of any kind in response to “whistleblowers,” or any individual who in good faith brings forth information about a potential or actual violation of law, company policy, or Code of Conduct.

**PROCEDURE:**

To comply with above policy, AZPC will follow the procedure detailed below: Whistleblower Protection policy is comprised of the following provisions:

1. Employees, business associates, FDRs, and enrollees/members are directed and encouraged to: bring forth information pertaining to incidents related to patient privacy issues, non-compliance, and other related matters.
2. Employees and FDRs are provided with compliance training in accordance with local, state and federal laws, including HIPAA/HITECH and FWA laws, and are required to follow those guidelines.
3. If at any time an individual or group of individuals becomes aware of any violation of law, company policy or Code of Conduct, including incidents relating to patient privacy issues or related matters, they are directed to bring their concerns immediately to the attention of their supervisor, the company’s Compliance Officer, Director of Human Resources or any member of the company’s Senior Management Team.
4. Individuals may report suspected violations of law, company policy, or Code of Conduct , including patient privacy breaches, fraud, waste, and abuse, and other issues of non-compliance by:
  - a. Reporting to employee’s supervisor
  - b. Notifying AZPC’s Compliance/Privacy Officer

**DEPARTMENT:** Compliance

**POLICY TITLE:** CMP06 Whistleblower Protection



- c. Calling the Corporate Compliance Hotline: 855-625-7894
- d. Mailing a written complaint to: HPN Corporate Compliance Officer, 39115 Trade Center Drive, Suite 220, Palmdale, CA 93551
- 5. AZPC shall not retaliate against a “whistleblower” or those who:
  - a. Testify, assist, or participate in an investigation, compliance review, proceeding, or hearing;
  - b. Oppose any act or practice made unlawful by law, provided that the person has a good faith belief that the practice is unlawful, and the manner of the opposition is reasonable and does not violate law and/or policies;
  - c. Bring forth information about breaches in patient privacy, non-compliance, and other related matters; and
  - d. Are victims of crime and who report to law enforcement about the suspected perpetrator of the crime in accordance with § 164.512(f)(3).
- 6. All reporting remains confidential (up to the limits of the law and as investigation allows) and may be reported anonymously.

**DEFINITIONS:**

None

**REFERENCES:**

Heritage Provider Network Policies  
45 CFR §164.512; § 164.530

**APPENDICES:**

None

**DEPARTMENT:** Compliance

**POLICY TITLE:** CMP06 Whistleblower Protection



**DOCUMENT REVISION LOG**

<b>Date</b>	<b>Document Modification (including deletions)</b>	<b>Page(s)</b>	<b>Location</b>
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