

Non-Intimidation & Non-Retaliation

Effective Date: 7/28/2014

Draft/Review Date: 8/18/2014

Policy

- A. It is the policy of the ACO to ensure that a Compliance Program exists and includes a practice on non-intimidation and non-retaliation for good faith reporting of compliance concerns.

Applicability

This policy and procedure applies to all Participants, Providers/Suppliers and other individuals or entities performing functions or services related to the ACO's activities.

Procedure

- A. All ACO Participants and Provider/Suppliers shall have an affirmative duty to report any and all potential incidents of non-compliance to the Compliance Officer.
- B. Any individual reporting potential non-compliance in good faith shall not be subject to any intimidation or retaliation.
- C. Training on the Non-Intimidation & Non-Retaliation Policy will be provided upon hire and annually thereafter.

Reporting

- A. N/A

Related Documentation

- A. 42 CFR §425.300
- B. ACO Terms & Definitions Policy
- C. Compliance Hotline Policy
- D. Compliance Plan