

**CHILDREN'S HOSPITAL LOS ANGELES MEDICAL GROUP**  
**COMPLIANCE POLICY MANUAL**

<b>POLICY</b>	Reporting Improper Conduct
<b>SIGN OFF</b>	Robert Adler, M.D., CHLAMG Compliance Officer
<b>ISSUED</b>	May 1, 2009
<b>REVISED</b>	June 6, 2018
<b>NUMBER</b>	CHLAMG 15-0006

**POLICY**

CHLAMG is committed to complying with all applicable laws and regulations, including those that the legislature and regulatory agencies designed to prevent and deter fraud, waste, and abuse. The organization desires a climate that discourages improper conduct and facilitates open communication of any compliance concerns and/or questions. CHLAMG expects personnel who have knowledge of, or in good faith, suspect any wrongdoing in the documenting, coding, or billing for services, equipment, or supplies; in the organization's financial practices; involving any violation of any law or regulation; or involving a violation of any CHLAMG or facility policy to promptly report it so the Compliance Department can conduct an investigation and take appropriate action. CHLAMG may take disciplinary action, up to and including termination, if personnel who suspect violations fail to report them.

**PROCEDURE**

There are many ways to report suspected improper conduct. In most cases, personnel should bring any concerns to the attention of a supervisor. However, if the supervisor does not take appropriate action, or if the individual is uncomfortable discussing these issues with their supervisor, they should take their concerns to another member of management, or use the reporting methods that the CHLAMG Compliance Program has made available for staff. Failure to report any known illegal conduct can have serious consequences.

Individuals may be reluctant to discuss wrongdoing with their supervisors because they fear retaliation. **CHLAMG will not permit any retaliation against CHLAMG personnel who bring forward concerns in good faith.** CHLAMG will only consider disciplinary action after clearly determining that someone has made a report of wrongdoing maliciously, frivolously, or in bad faith.

**Below are the procedures for reporting and investigating potential compliance issues:**

1. If at any time, CHLAMG personnel become aware of or suspect illegal or unethical conduct or a violation of CHLAMG policies, they must report it immediately to an appropriate individual. Such individuals may include their immediate supervisor, manager, Compliance Director, or the Human Resources Director.
2. Reporting directly to the Compliance Office / Director can be accomplished in a variety of ways:
  - a. The toll-free Compliance Hotline can be accessed 24 hours a day at **(1-877-658-8022)** to report misconduct, anonymously\* if they prefer.
  - b. You may choose to contact the compliance department in person to report a potential violation.
  - c. Through email or letter to the Compliance Office / Director is an acceptable method to report violations as well.

\* At the request of the individual reporting a violation and, to the extent possible and permitted by law, CHLAMG will take reasonable precautions to maintain the confidentiality of those individuals who report legal or Corporate

Compliance Policy violations. Anyone who improperly violates an individual's right to confidentiality or anonymity in connection with a reported incident will be subject to disciplinary action, up to and including immediate termination. When using the Compliance Hotline, individuals may choose to remain anonymous at the time of the call.

3. CHLAMG encourages self-reporting. CHLAMG will give due consideration in potential mitigation of any disciplinary action for personnel who self-report their own wrongdoing or violation of law.

Once the Compliance Department receives a report, an investigation will be conducted into the allegation to determine the nature, scope and duration of impropriety, if any. CHLAMG investigates all non-frivolous claims of wrongdoing. If CHLAMG substantiates the allegation, the Compliance Department will develop a plan for corrective action. Appropriate corrective actions may include, restitution of any overpayment amounts, notifying an appropriate government agency, disciplinary action or making changes to policies and procedures to prevent future occurrences.

CHLAMG encourages its employees to make good faith reports of possible violations of any applicable law or regulation, the code of conduct, or any CHLAMG policy. CHLAMG strictly prohibits retaliation in any form against anyone who makes a report of wrongdoing or cooperates in an investigation. If any employee believes an individual or the organization is retaliating against him or her, he or she should report it immediately, using any of the reporting methods this policy references.

A log will be maintained by the Compliance office, which records all issues or inquiries reported relating to compliance, privacy or security. The log will include the nature and results of any investigation.

Our commitment to compliance and ethical conduct depends on all personnel. Should anyone find themselves in an ethical dilemma or suspect inappropriate or illegal conduct, they should remember CHLAMG has internal processes that are available for guidance or for reporting suspected unethical conduct, including the Compliance Hotline **(1-877-658-8022)**.

## **RELATED POLICIES**

CHLAMG Code of Conduct