

<b>Policy Title:</b> Duty to Report Suspected Non-Compliance			
<b>Department Responsible:</b> THN Compliance & Integrity	<b>Policy Number:</b> CIT-001	<b>THN's Effective Date:</b> January 1, 2022	<b>Next Review/Revision Date:</b> September 30, 2024
<b>Title of Person Responsible:</b> THN Compliance Officer	<b>THN Approval Council:</b> THN Compliance and Privacy Committee	<b>Date Approved:</b> June 9, 2023	<b>Date Approved by THN Board of Managers:</b> <b>August 15, 2023</b>

- I. **Purpose.** The purpose of CIT-001 is to provide (1) a statement of Triad HealthCare Network's (THN's) policy regarding the duty to report suspected non-compliance with THN 's Compliance Plan, Code of Conduct, Policies and Procedures, and applicable laws and regulations and (2) procedures to ensure that THN's practices are consistent with its stated policy.
  
- II. **Policy.** THN Related Individuals are required to report any suspected non-compliance with applicable laws or regulations, the Compliance Plan, Code of Conduct, Policies and Procedures, and/or any other applicable THN requirements. THN shall provide the necessary infrastructure to facilitate such reporting, including a confidential reporting line that allows such individuals to report suspected incidences of non-compliance anonymously and without fear of retaliation. THN Related Individuals are required to report probable violations of law to an appropriate law enforcement agency.
  
- III. **Procedure.**
  - A. **Reporting Suspicions of Non-Compliance.**
    1. **Reporting Required.** THN Related Individuals must report any activity, practice, or arrangement that the individual in good faith believes violates or may violate any laws or regulations, THN's Compliance Plan, Code of Conduct, Policies and Procedures, or other applicable requirements of the ACO REACH Model.
    2. **Manner of Reporting.** THN Related Individuals are encouraged to report suspected Compliance Program violations in any of the following ways:
      - a. To the THN Compliance Officer,
      - b. To the individual's direct supervisor or another member of THN's leadership (if this individual alone receives a report

of a suspected Compliance Program violation, he or she must immediately report the suspected Compliance Program violations to THN's Compliance Officer);

- c. Online using the Navex Compliance Management Platform [www.conehealth.ethicspoint.com](http://www.conehealth.ethicspoint.com)
- d. To the Compliance E-mail Box; and/or
- e. To the Confidential Privacy Helpline.

### 3. Reporting Options.

- a. Reports of suspected Compliance Program violations may be made either in writing or orally.
- b. Written reports include reports made via regular mail or e-mail and sent to any of the individuals or locations listed in **Section III.A.2** above.
- c. Oral reports include reports made in-person or via telephone. Oral reports may be made to THN's Confidential Privacy Helpline, which shall be available 24 hours a day, 7 days per week. Individuals do not need to provide their name when making a report, although they are encouraged to do so to facilitate any appropriate or necessary follow-up.

**B. Anonymity.** Reports (whether written or oral) may be made anonymously.

### C. Documentation.

1. THN's Compliance Officer, or his or her designee, shall maintain copies of any written reports submitted pursuant to CIT-002 on Cone Health's Share Point site.
2. THN's Compliance Officer, or his or her designee, shall document any oral reports submitted concerning suspected Compliance Program violations, and shall maintain such documentation on Cone Health's SharePoint site.
3. Final copies of work papers, notes, and other documentation generated in connection with every written or verbal report submitted concerning suspected incidences of non-compliance shall be maintained on the Cone Health SharePoint site, which includes electronic files.
4. THN's Compliance Officer shall document follow-up action taken as a result of any reports submitted concerning suspected Compliance Program violations and shall maintain related documentation on the Cone Health SharePoint site include electronic files, pursuant to CIT-002.



- 5. THN’s Compliance Officer shall, pursuant to CIT-002, keep confidential (to the extent possible) the identity of the person(s) who report suspected Compliance Program violations.
- D. THN’s Compliance Officer shall notify the Board of Managers as part of his or her regular reporting obligations, regarding any action taken in response to reported Compliance Program violations that have been verified through investigation pursuant to CIT-002 to be compliance violations.
- E. All documentation enumerated above, which may include electronic documentation, shall be maintained on the Cone Health SharePoint site THN's document retention policies but, in no case, for a period of less than ten years.

Date	Reviewed	Revised	Notes
January 1, 2022			Originally Published
August 2022	X		No changes
May 2023		X	Converted to REACH and added Navex information