

**NOYES HEALTH
CORPORATE COMPLIANCE POLICY/PROCEDURE**

Subject: Internal Disclosure Program
Effective Date: June, 2013
TJC Ref: None

Policy: CC-02
Issued By: Administration
Page: 1 of 1

Purpose of the Disclosure Program:

The purpose of the internal disclosure program is to enable individuals to disclose to the Corporate Compliance Officer, or some other individual who is not in the disclosing individual's chain of command, any identified issues or questions associated with the policies, conduct, practices, or procedures of Noyes Health. The internal disclosure program will emphasize a non-retribution, non-retaliation policy.

Policy/Procedure:

1. Upon receipt of a disclosure, the Corporate Compliance Officer (or designee) shall make a preliminary, good faith inquiry into the allegations set forth in every disclosure to ensure that he or she has obtained all of the information necessary to determine whether further review should be conducted.
2. For any disclosure that is sufficiently specific so that it reasonably permits a determination of the appropriateness of the alleged improper practice and provides an opportunity for taking corrective action, an internal investigation of the allegations shall be conducted and ensure that proper follow-up is conducted.

Disclosure Log: The Corporate Compliance Officer will maintain a disclosure log, which shall include a record and summary of each disclosure received (whether anonymous or not), the status of the internal reviews, and any corrective actions taken in response to the internal reviews. The disclosure log will be available to the Office of the Inspector General (OIG) upon request.

Corporate Compliance Confidential Help Line: A confidential help line has been established to provide a mechanism to enable individuals to disclose any issues or questions associated with the policies, conduct, practices, or procedures with respect to federal health care programs. **The number of the confidential compliance help line is 1-585-335-4330. The Corporate Compliance Officer can also be reached directly at Extension 305. Callers to the confidential compliance help line and/or the Corporate Compliance Officer may remain anonymous to the fullest extent practicable in an investigation. No retaliatory disciplinary action is taken against any employee reporting a corporate compliance issue or concern.**

Originated: 4/03

Revised: 3/05, 3/06, 7/09, 9/12, 6/13

POL:CORPCOMPL

Committee Approval: Corporate Compliance Committee – June 12, 2013

Distribution: Original – Administration; Copy – Via Meditech

Signature: 

Date: 6/17/13