

**EPIC MANAGEMENT, L.P.
BEAVER MEDICAL GROUP, L.P.
EPIC HEALTH PLAN**

**ADMINISTRATIVE POLICY AND PROCEDURE
COMPLIANCE**

SUBJECT: Duty to Report Compliance Concerns	
DRAFTED BY: Sherry Miller, CCO	DATE: 8/17/2020
REVIEWED BY:	DATE:
REVISED BY:	DATE:
APPROVED BY: Compliance Committee	DATE: 8/17/2020
BOARD APPROVAL DATE: N/A	
EFFECTIVE DATE OF POLICY: 9/1/2020	

1. **PURPOSE:** This EPIC Duty to Report Compliance Concerns Policy sets forth the duty of Personnel to report Compliance Concerns, and procedures for reporting such Compliance Concerns.
2. **ATTACHMENTS:** N/A.
3. **DEFINITIONS:**
 - a. All capitalized terms used but not defined in this Policy shall have the meaning attributed to them in the EPIC Compliance Program Definitions Policy.
 - b. In addition, the following capitalized terms shall have the following meanings for purposes of this Policy:
 - i. “Compliance Concern” refers to any suspected misconduct, compliance irregularities, or any other activity, practice, or arrangement that any Personnel member believes in good faith violates or may violate applicable laws or regulations, Federal Health Care Program requirements, EPIC Compliance Program Policies, or the EPIC Code of Conduct.
 - ii. “Compliance Hotline” refers to EPIC’s compliance telephone line, as described in this Policy.
4. **POLICY:** All Personnel have a duty to report Compliance Concerns. Failure to a report a Compliance Concern is a violation of EPIC’s Compliance Program.

a. Reporting Compliance Concerns

- i. When to Report. All Personnel have a duty to report a Compliance Concern promptly, and within twenty-four (24) hours whenever possible, of becoming aware of such Compliance Concern.
- ii. Reporting to Whom. Reporting of Compliance Concerns must be made to the Corporate Compliance Officer or such other person(s) designated by the Corporate Compliance Officer or EPIC from time to time.
 - (1) If the Personnel member does not feel comfortable reporting the Compliance Concern directly to the Corporate Compliance Officer (or their designee), the Personnel member may report the Compliance Concern to their supervisor or the EPIC Human Resources Department.
 - (2) If a direct supervisor or the EPIC Human Resources Department receives a report of a Compliance Concern, the supervisor or Human Resources Department member must report the Compliance Concern to the Corporate Compliance Officer (or their designee) in a manner that protects the reporting party's privacy and dignity to the greatest extent possible.
 - (3) If the Personnel member does not feel comfortable reporting the Compliance Concern to the Corporate Compliance Officer (or their designee), to their supervisor, or to the EPIC Human Resources Department, the Personnel member should report the Compliance Concern through the Compliance Hotline.
 - (4) The Corporate Compliance Officer shall keep Health Care Counsel generally apprised of any reports made pursuant to this Policy.

b. Procedures to Report a Compliance Concern

- i. Form of Report. Reports of Compliance Concerns may be made either in writing or orally. Written reports include reports made via regular mail or email. Oral reports include reports made in-person or via telephone.
- ii. Compliance Hotline. Compliance Concerns can be reported, on an anonymous or confidential basis, to the following Compliance Hotline:

**Compliance Hotline
(909) 335-4153**

available 24 hours/day, 365 days/year

- iii. Contact Information for Corporate Compliance Officer and Designees. Compliance Concerns can be reported, on an anonymous or confidential basis, directly to any of the following:

EPIC Compliance Department

E-mail: compliance@epiclp.com

Mail: P.O. Box 19020, San Bernardino, CA 92423-9020

Corporate Compliance Officer

External: 909-786-0821

Internal ext.: 43621

General Compliance Manager

External: 909-786-0822

Internal ext.: 43622

- iv. Contact Information for Human Resources Department.

Human Resources Department

External: 909-335-4195

Internal ext.: 43513

Mail: 1615 Orange Tree Lane, Redlands, CA 92374

- v. Anonymity. Reports of Compliance Concerns, whether written or oral, may be made anonymously. However, reporters are encouraged to identify themselves when reporting, as it often is easier to assess the issues or concerns raised in a report when there is the ability to ask the reporters follow-up questions.
- vi. Confidentiality. The Corporate Compliance Officer (and their designee(s)) shall keep confidential (to the greatest extent possible) the identity of the person(s) who report(s) Compliance Concerns. While EPIC will always strive to maintain the confidentiality of a reporter's identity, in rare circumstances it may become necessary for a reporter's identity become known or be revealed (e.g., pursuant to legal process).

c. **Documentation**

i. Disclosure Log.

(1) The Corporate Compliance Officer (or their designee) shall maintain a Disclosure Log of all reports of Compliance Concerns (whether written or oral). The Disclosure Log shall include a summary of each report received (whether anonymous or not), the individual or department responsible for reviewing the disclosure, the status of the review, and any corrective action taken in response to the review. Reports of Compliance Concerns shall be recorded in the Disclosure Log within two (2) business days of receipt of the report. In conformity with generally accepted compliance review procedures, the Disclosure Log, final copies of work papers and other documentation generated in connection with every written or oral report shall be maintained in the EPIC Compliance Program files.

iii. All documentation enumerated above shall be maintained in compliance with the EPIC Compliance Program Records Retention Policy.