

Reporting Compliance Issues to AHC's Compliance Officer: Procedure

Policy:

The Door – A Center of Alternatives, Inc., Adolescent Health Center (AHC) is committed to establishing and maintaining meaningful and open lines of communication between affected individuals and the Compliance Officer and ensuring the confidentiality of compliance-related matters. Any affected individual who is aware of or suspects a violation of an applicable law, rule, regulation or AHC's policies and procedures, has an affirmative duty to report in good faith such information. All reports of alleged, known or suspected non-compliance may be reported through the regular chain of command. All such reports should then be reported to the Compliance Officer by the manager, supervisor or recipient. Any individual who, for any reason, is uncomfortable with reporting through the regular chain of command should report the information directly to the Compliance Officer, as described in the below procedure.

Procedure:

- A. How to Report Compliance Issues to the Compliance Officer: All employees who are aware of or who suspect a violation of an applicable law, rule, regulation or AHC's policies and procedures have an affirmative duty to report such information. Employees may report through the regular chain of command, or they may report directly to the Compliance Officer as follows:
 - a. **To report anonymously:** AHC provides employees with the following anonymous reporting options:
 - i. File on-line at <https://www.door.org/compliance/>
 1. Scroll down to the Reporting Issues section. If you do not want the Compliance Officer to know your identity, do not enter your contact information; simply enter the compliance information you wish to share.
 - ii. Sending a letter to the Compliance Officer without including their name, contact information or other information that would allow for identification.Because anonymous reports do not include your identity or contact information, the Compliance Officer will not be able to contact you to ask additional questions, request documents or provide updates on the investigation. Please provide as much detail as possible when making an anonymous report.
 - b. **To report and provide your identity and contact information:**
 - i. Contact Rhonda Harris, Chief Compliance Officer, @ (646) 989-7182 or via email rharris@door.org. Reports received at these phone numbers and email addresses are not anonymous because these systems display and/or store the phone number, email address and/or the location information about the person submitting the report.
 - ii. File on-line at <https://www.door.org/compliance/>. Scroll down to the Reporting Issues section. To identify yourself and provide your contact information in the appropriate fields. Employees may request that the Compliance Officer keep information in their report (including their identity) confidential. The Compliance Officer will honor such requests unless the matter is turned over to law enforcement.

- B. **Duty to Report Compliance Issues:** Failure to report instances of suspected non-compliance is a violation of AHC's Compliance Program. AHC will not take retaliatory action against an employee who, in good faith, reports suspected or known instances of non-compliance. Good faith participation includes reporting potential issues, investigating issues, self-evaluations and audits, remedial actions, and reporting to appropriate officials. Any employee who is involved in an act of retaliation, intimidation or harassment of an individual who reports a compliance concern in good faith will be subject to disciplinary action.

Confidentiality of Internal Reports

When submitting a report of potential or actual noncompliance to Health Center, the Individual shall be asked to provide details related to the activity or situation. The Individual may request that Health Center keep their identity confidential (i.e., not identify them as the Individual making the report). Health Center shall maintain the confidentiality of the Individual's identity to the extent possible; however, to thoroughly investigate a report, Health Center may need to reveal the identity of the Individual who reported. Health Center may be legally required to report noncompliance to appropriate entities, including disclosing the identity of the Individual who reported.

Individuals who do not want their identity disclosed should report anonymously, as described above. Upon receipt of an anonymous report, Health Center shall investigate the report; however, there may not be enough information to conduct a thorough investigation. In addition, Health Center shall be unable to contact the Individual who made the report to provide updates or request additional information.

Documenting Reports Received

Health Center's Compliance Officer (or their designee) shall promptly record all disclosures of compliance concerns in a disclosure log maintained by the Compliance Officer.

All disclosures shall be logged regardless of how they are made (i.e., whether made directly to the Compliance Officer or other compliance personnel, to another entity leader, or through an anonymous reporting mechanism). The disclosure log shall include pertinent information regarding each disclosure, such as the date received, the Individual or department responsible for review, a description of the investigation's findings, any corrective actions taken, any policy or process changes made as a result of the investigation, the date resolved, and, if applicable, any resulting referral or disclosure to appropriate entities.

External Reporting.

Individuals also have the right to report potential or actual noncompliance to the appropriate entities, including:

- Office of Inspector General (OIG) Hotline (1-800-HHS-TIPS) or online allegation form (<https://hotline.oig.dhs.gov/#step-1>) for Medicare related matters
- Call New York State Office of Medicaid Inspector General (OMIG) Fraud Hotline at 1-877-87 FRAUD (1-877-873-7283) or [file a claim electronically](#).

Nonretaliation

As described in Health Center's Nonretaliation and Whistleblower Protection Policy, no retaliatory action shall be taken against any Individual who, in good faith, reports potential or actual noncompliance.