

Administrative Manual
NON-RETALIATION FOR REPORTING

Policy Number: 12.30

Page 1 of 2

Objective: It is Covenant's position that developing open lines of communication for its colleagues regarding compliance issues is key to maintaining an effective compliance program and increasing employee relations and morale. As a result, Covenant has developed this policy to encourage colleagues to report suspected violations problems, concerns and opinions, including suspected violations of law, regulations, company policies and the Code of Conduct, on such issues without fear of retaliation or reprisal. This policy is intended to meet the requirement of the Office of Inspector General's "Compliance Program Guidance for Hospitals.

Scope: All colleagues working in any Covenant facilities and entities.

Policy:

1. All colleagues, including supervisors and managers, are responsible for promptly reporting suspected wrongdoing, including a suspected violation of a law, regulation, policy, procedure, or of the Code of Conduct.
2. Colleagues who, in good faith, report a possible violation of law, regulation, policy, procedure or the Code of Conduct will not be subjected to retaliation, retribution or harassment. No colleague is permitted to engage in retaliation, retribution or any form of harassment against a colleague who reports compliance related concerns. Any colleague who conducts or condones retribution, retaliation or harassment in any way will be subject to discipline, up to and including termination of employment.
3. Colleagues cannot exempt themselves from the consequences of wrongdoing by reporting their own wrongdoing, although self-reporting may be taken into account in determining the appropriate course of action.
4. All colleagues, including supervisors and managers, are responsible for promptly reporting suspected retaliation, retribution or harassment to the Corporate Compliance Office.

Definitions:

1. Colleagues – Directors, Officers, Employees, Medical Staff, Volunteers, Suppliers, Vendors, Contractors, Consultants and Agents
2. Retaliation – Discipline, demotion, termination of employment or any other form of retribution or harassment because a colleague reported in good faith a suspected wrongdoing or other compliance concern.

Procedure:

1. Colleagues should report all suspected wrongdoing or any other compliance concerns to their immediate supervisor. If for any reason, the colleague is uncomfortable reporting suspected wrongdoing or any other compliance concerns to their supervisor, the colleague should report the suspected wrongdoing or compliance concern to the Corporate Compliance Office or on the Compliance Hotline @ 888.421.5776 or 583.4499.
2. If any Manager, Director or Vice President has received a report of retaliation, retribution or harassment, the supervisor should immediately report the allegation to the Corporate Compliance Office.

3. All managers should be instructed to take aggressive measures to assure their staff that Covenant truly encourages the reporting of compliance issues and that colleagues will not "get into trouble" for doing so.
4. It is critical that every colleague at Covenant understand that any incident where retaliation or reprisal can be related to an colleague raising/reporting a compliance issue, either at the organization level or through the compliance program, will not be tolerated. Reports of this nature must be investigated thoroughly and expeditiously, with appropriate disciplinary actions taken, up to and including termination of employment.
5. Ensure the confidentiality of colleague(s) raising compliance issues at all times, insofar as legal and practical, informing only those personnel who have a need to know.

EMPLOYEES WHO FEEL THEY ARE BEING RETALIATED AGAINST

1. Employee concerns regarding any issue of perceived retaliation should be reported to their immediate supervisor.
2. If for any reason, the employee is uncomfortable reporting perceived retaliation or any other compliance concerns to their supervisor, the employee should contact the Corporate Compliance Office or the Compliance Hotline @ 888.421.5776 or 583.4499.

SUPERVISORS WHO ARE RECEIVING A COMPLAINT OF RETALIATION

1. Receive all colleague concerns, problems and opinions and explore with the colleague suggestions for resolving the issue.
2. Inform the Corporate Compliance office or Compliance Hotline of all compliance concerns and problems raised by colleagues (including any alleged retaliation).
3. Maintain the confidentiality of colleague concerns and problems at all times, insofar as legal and practical, informing only those people whom have a need to know.

HUMAN RESOURCE DEPARTMENT HANDLING OF RETALIATION COMPLAINTS

1. Keep the Corporate Compliance Office and Administration informed of all suspected compliance concerns and problems raised by colleagues including but not limited to retaliation, retribution or harassment.

Related Policies/Procedures:

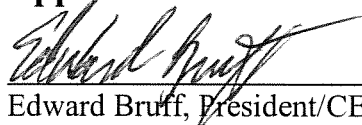
Code of Conduct brochure
Human Resource policies: Deficit Reduction Act;
Whistleblower Policy

Reviewed by: Executive Team 1/19/00

Effective date: 1/19/00, 1/19/03, 6/2004, 5/2006, 10/2009, 10/2012, 10/2015

Review date: 10/2018

Approval:



Edward Bruff, President/CEO

October, 2015
Date