



# Policy & Procedure

CORPORATE COMPLIANCE PROGRAM  
**COMPLIANCE CONCERN REPORTING AND  
NON-RETALIATION**

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<b>FUNCTION</b>	Administration
<b>NUMBER</b>	VI.K
<b>ISSUED</b>	December 2000
<b>REVISED</b>	1/06; 12/13

## PURPOSE

The Evangelical Lutheran Good Samaritan Society recognizes that a critical aspect of its Compliance Program is the establishment of a culture that promotes prevention, detection and resolution of instances of conduct that do not conform to federal and state healthcare program requirements, as well as to The Evangelical Lutheran Good Samaritan Society's ethical and business policies.

To promote this culture, the Society has established a problem resolution process and a non-retaliation policy to safeguard employees and others from retaliation, who report problems and concerns in good faith. Any form of retaliation or retribution can undermine the problem resolution process and result in a failure of communication channels in the Society.

## POLICY

All Society employees have an affirmative duty and responsibility for reporting perceived misconduct, including actual or potential violations of laws and regulations. Failure to exercise this duty may result in disciplinary action, up to and including termination. The Society will maintain an "open-door policy" throughout all levels of management to encourage employees to report problems and concerns.

Employees are encouraged to utilize established procedures to report concerns. To ensure their protection against retaliation, employees may utilize the Compliance Solutions Hotline at any time and callers may remain anonymous or may seek confidentiality.

Any form of retaliation or retribution against any employee who reports misconduct in good faith is strictly prohibited. Any employee who commits or condones any form of retaliation or retribution will be subject to discipline up to, and including, termination.

Employees cannot exempt themselves from the consequences of their own misconduct by reporting the issue, although self-reporting may be taken into account in determining the appropriate course of action.

## PROCEDURE

Procedures that apply to all employees:

1. Knowledge of misconduct, including actual or potential violations of laws and regulations must be timely reported to the employee's supervisor, administrator, the corporate compliance officer (CCO), or reported anonymously utilizing the Compliance Solutions Hotline [(800) 631-6142]. Employees should follow the Society's policy and procedure related to reporting suspected resident abuse.

2. The Society's **Employment Handbook** contains the Fair Treatment Policy that should be followed for issues that do not involve suspected compliance violations. The Society's **Employment Handbook** also contains a procedure that is to be followed for reporting harassment, health and safety concerns and workplace violence.
3. Knowledge of a violation or potential violation of this policy must be reported to the employee's supervisor, administrator, CCO or by using the Compliance Solutions Hotline.