



POLICY # COMP-DMG-006	Revision: 4.0	Page 1 of 2
TITLE: Reporting Potential Compliance Violations		
Department: Compliance	Effective date: February 2014	
<p><i>Teammates must promptly report all potential violations of the Code of Conduct, DMG policies and procedures and/or applicable laws or regulations. Reports should be made to the Compliance department, or the Compliance Hotline, 1-855-236-1448, <a href="http://www.healthcarepartners.ethicspoint.com">www.healthcarepartners.ethicspoint.com</a>. In accordance with DMG's Non-Retaliation policy, DMG will not tolerate any form of retaliation against anyone who files a compliance report in good faith. Questions regarding any compliance policy may be directed to the Compliance department.</i></p>		

**1. PURPOSE AND SCOPE**

The purpose of this policy is to provide guidelines for reporting potential violations of DaVita Medical Group's Code of Conduct (Code), compliance policies and procedures, and/or applicable laws or regulations. This policy applies to DaVita Medical Group, including HealthCare Partners, WellHealth Medical Group, Magan Medical Clinic, The Everett Clinic, Northwest Physicians Network, and Mountain View Medical Group (collectively "DMG").

**2. DEFINITIONS**

Term	Definition
Compliance Hotline	A toll-free number and web portal managed by a third party on behalf of the Compliance department which allows DMG Teammates, Guest Teammates, patients, physicians, vendors, or other third parties to report, in Good Faith, Potential Compliance Violations. <ul style="list-style-type: none"> <li>Toll-free number: 855.236.1448</li> <li>Web portal: <a href="http://www.healthcarepartners.ethicspoint.com">www.healthcarepartners.ethicspoint.com</a></li> </ul>
Contracted Provider	Any individual or entity under an arrangement to provide healthcare services to DMG patients or patients attributed to DMG. A Contracted Provider does not include any individual employed by DMG (including employees of a medical group(s) managed by DMG).
Good Faith	Truthful, and without malice or ill intent. A complaint, disclosure or report must be based on a reasonable belief that a Potential Compliance Violation has occurred or might occur.
Guest Teammate	Any temporary worker, agency employee or contract employee who temporarily works on behalf of DMG.
Potential Compliance Violation	Any act, conduct, event or situation that involves, or might result in, a potential violation of DMG's Code, compliance policies and procedures or other compliance-related directives, and/or applicable laws and regulations, including those that apply to federal and state health care programs.
Reporter	A DMG teammate, patient, physician, vendor, Guest Teammate, Contracted Provider or external agent who acts on behalf of DMG, who reports a Potential Compliance Violation, verbally or in writing, through any mechanism or communications channel, including the Compliance Hotline.
Retaliation	Adverse employment action and/or other adverse treatment, such as intimidation, threats, coercion, or discrimination against a Reporter.

### 3. POLICY

- 3.1. It is every teammate's responsibility to inform DMG of Potential Compliance Violations. Reports must be made to a teammate's manager, a member of senior management, a member of the DMG Legal department, a member of the Compliance department, or the Compliance Hotline.
- 3.2. DMG has established a disclosure program, which includes a mechanism for reporting Potential Compliance Violations confidentially and anonymously. That mechanism is the Compliance Hotline.
- 3.3. DMG strives to maintain the confidentiality of Reporters who report Potential Compliance Violations. However, the identity of the individual making the report may become known or need to be revealed in order to conduct an effective investigation or if required under applicable laws and regulations (e.g., in the event of a government investigation). Refer to the [Non-Retaliation for Reporting Potential Compliance Violations](#) policy.
- 3.4. Self-reporting is encouraged and is consistent with DMG's commitment to legal and regulatory compliance and transparency with stakeholders. Although self-reporting may be taken into account in determining what, if any, disciplinary action is appropriate or warranted, it will not exempt or insulate teammates from any such action.
- 3.5. Upon receiving a disclosure or report of a Potential Compliance Violation, the Chief Compliance Officer, or his/her designee, gathers all information from the disclosing individual and makes a preliminary Good Faith inquiry into the allegations to ensure that Compliance department has obtained all of the information necessary to determine whether a further review should be conducted. When further review is needed, the Compliance department will initiate such review in a timely manner.
- 3.6. DMG conducts an internal review of every disclosure or report that is sufficiently specific to reasonably permit a determination of the appropriateness of the alleged misconduct or improper practice. Upon the conclusion of the internal review, as appropriate and warranted, the Compliance department ensures that proper follow-up is conducted, including self-disclosures to government agencies as required by laws and/or regulations. This may include:
  - 3.6.1. Reporting violations of law or regulation to health plans as required by individual health plan contracts; and
  - 3.6.2. Providing non-privileged information about investigations to contracted health plans as required by individual health plan contracts.
- 3.7. DMG prohibits Retaliation against anyone who, in Good Faith, reports a Potential Compliance Violation, in accordance with the [Non-Retaliation for Reporting Potential Compliance Violations](#) policy.
- 3.8. Reports must be made regardless of when the conduct occurred or whether the conduct has ended or remains ongoing. Managers who receive from a teammate a report of a Potential Compliance Violation must promptly refer the disclosure to the Compliance department.

### 4. PROCEDURES

- 4.1. N/A

### 5. APPLICABLE DOCUMENTS

- 5.1. [Code of Conduct](#)
- 5.2. [Compliance Policies and Procedures](#)
- 5.3. [Non-Retaliation for Reporting Potential Compliance Violations policy](#)

**6. REVISION HISTORY**

<b>REVISION HISTORY</b>			
<b>Doc. Revision</b>	<b>Description</b>	<b>Revision Date</b>	<b>Last Date Reviewed</b>
1.0	Policy Creation	Feb 2014	Feb 2014
2.0	Revised	Apr 2015	Apr 2015
3.0	Revised and Rebranded to DaVita	Jun 2017	Jun 2017
4.0	Rebranded to DMG	Jan 2018	Jan 2018
5.0	Annual policy review and updates	Nov 2018	Nov 2018