

Effective Date: 11/17/2020

Review Date: 11/17/2020

Revised Date:

North Sound Behavioral Health Administrative Services Organization, LLC

Section 2000: Non-Retaliation

Authorizing Source: HCA Contract

Approved by: Executive Director Date: 11/27/2020 Signature:

POLICY # 2002.00

SUBJECT: NON-RETALIATION

PURPOSE

North Sound Behavioral Health Administrative Services Organization (North Sound BH-ASO) believes all staff, Executive and Advisory Board members, vendors, delegates, and subcontractors should express their problems, concerns and opinions on any issue and feel that their views are important. This policy is designed to encourage staff, vendors, delegates, and subcontractors to communicate problems, concerns, and opinions without fear of retaliation or retribution.

DEFINITIONS

None

POLICY

1. All staff, Executive and Advisory Board members, vendors, delegates, and subcontractors are responsible for promptly reporting actual or potential wrongdoing, including an actual or potential violation of law, regulation, policy, or procedure.
2. The North Sound BH-ASO Compliance Officer will maintain an "open door policy" to allow any individual the opportunity to report problems and concerns.
3. The North Sound BH-ASO Compliance Officer will act upon the concern promptly and in the appropriate manner.
4. The North Sound BH-ASO Compliance Hotline, 1-800-684-3555, is designed to permit any individual to call, anonymously or in confidence, to report problems and concerns or to seek clarification of compliance-related issues.
5. Any individuals who report concerns in good faith will not be subjected to retaliation, retribution, or harassment.
6. No staff, Executive or Advisory Board members, vendors, delegates, or subcontractors are permitted to engage in retaliation, retribution or any form of harassment against another individual for reporting compliance-related concerns. Any retribution, retaliation or harassment will be met with disciplinary action.
7. No individual can exempt themselves from the consequences of wrongdoing by self-reporting, although self-reporting may be taken into account in determining the appropriate course of action.

PROCEDURES

1. Knowledge of actual or potential wrongdoing, misconduct, or violations of the Program Integrity Plan must be reported immediately to a supervisor, the North Sound BH-ASO Compliance Officer, or the North Sound BH-ASO Compliance Hotline.
2. All North Sound BH-ASO managers must maintain an open-door policy and take aggressive measures to

assure their staff that the system truly encourages the reporting of problems and that there will be no retaliation, retribution, or harassment for doing so.

3. North Sound BH-ASO must ensure that all staff, Executive or Advisory Board members, vendors, delegates, and subcontractors are provided with a copy of this policy.
4. If a North Sound BH-ASO staff member feels uncomfortable with reporting concerns to their supervisor, the staff member should report concerns directly to the North Sound BH-ASO Compliance Officer of the North Sound BH-ASO Compliance Hotline.
5. All concerns will be addressed according to the timelines outlined in the Program Integrity Plan and Policy 2001.00.
6. Confidentiality regarding concerns and problems will be maintained at all times, insofar as legal and practical, informing only those personnel who have a need to know.
7. Any issue identified as pertaining to human resources will be forwarded to the North Sound BH-ASO Human Resource Department.

ATTACHMENTS

None