PROCEDURE STATEMENT:
Health Quest Systems, Inc. and its affiliates (“HQ”) has a process in place to accept and promptly investigate any reported disclosures by a potential Workforce whistleblower without the threat of retaliation.

PROCEDURE:
Health Quest will implement its non-retaliation policy so long as the Workforce Member abides by 45 CFR 164.502(j) which requires that both of the following specific conditions are met:

1. The Workforce Member or business associate must believe, in good faith, that the organization has engaged in unlawful conduct, has violated professional or clinical standards, or the care, services or conditions provided by the organization potentially endangers one or more patients, employees or the public; and
2. The Workforce Member releases information to a health oversight agency, a public health authority, an accreditation organization or an attorney retained by the employee or business associate for the purpose of determining the legal options of the Workforce Member/business associate with regards to the conduct of the organization.

Workforce Members are encouraged to first report any organizational misconduct to their immediate supervisor, the organization’s Compliance Officer, and/or place a call to the Confidential Compliance Helpline 1-844-YES-WeComply (1-844-937-9326). The Workforce Member may remain anonymous when calling the Compliance Hotline.

Whistleblower protections are provided in two important areas: confidentiality and retaliation. The confidentiality of the whistleblower will be maintained unless the identity has to be disclosed to conduct a thorough investigation, to comply with the law, and to provide accused individuals their legal rights of defense. Non-retaliation applies to all good faith whistleblower reports.

DEFINITIONS:
See: HIPAA Glossary

REFERENCES:
45 RF §164.502(j) and 160.316
Title: Disclosures by Whistleblowers Procedure
Reference Number: HQ 5.2.06

Signature: Chief Compliance Officer
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Federal Sentencing Guidelines for Organizations 8B2.1(b)(5)(c)
HQ 5.1.05 Detection and Prevention of Fraud, Waste and Abuse Policy and Procedure
COMP 1-1-19 Whistleblower Protection Policy
HQ 5.2.06 Disclosures by Whistleblowers Policy

POLICY HISTORY:
Supersedes: 2/13/2019
Original Implementation Date: 2/27/2014
Date Reviewed: 2/28/2019
Date Revised: 2/27/2014, 2/13/2019, 2/28/2020

APPROVAL:

[Signature]
Wayne A. Fields
Procedure Owner

2/10/20
Date