

## **Reporting of Potential Compliance Violations and Anti-Retaliation**

**Objective:** Set forth PSI's policy for reporting potential compliance violations

### **Posting of Notice for Compliance Reporting Requirements**

- PSI will post on its website and/or other prominent places accessible to all Covered Persons the following information:
  - The name and contact information of PSI's Compliance Officer:

Deanna Callahan  
Compliance Officer  
[dcallahan@uneeedpsi.org](mailto:dcallahan@uneeedpsi.org)  
internal extension 1498  
Ph. 804.293.8353
  - The HHS-OIG Fraud Hotline number: 1-800-HHS-TIPS
- The notice will encourage Covered Persons to report suspected fraud and abuse in a timely manner.
- The notice will state that all compliance reports will be treated as confidential.

### **Reporting of Violations**

- Every PSI employee, officer, director, owner or agent is required to report suspected compliance violations to the Compliance Officer, General Counsel, his or her supervisor, or other management any violation of the health care fraud and abuse laws, PSI's IA, or PSI's policies and procedures (hereinafter "compliance violations"), which he or she reasonably believes to have occurred.
- Supervisors and other managers are expected to report any suspected compliance violations to the Compliance Officer.
- Reports of suspected compliance violations may be made anonymously and will be kept confidential.
  - Individuals reporting suspected compliance violations will not be required to give their names but may choose to do so.

- All communications regarding any suspected compliance violations reported to supervisors, managements, the Compliance Officer, or the General Counsel will be handled with the strictest of confidence within the boundaries of the law.

### **No Retaliation Policy**

- An employee who in good faith reports suspected wrongdoing will not be subject to retaliation or discipline for having done so, even if the information incriminates other management, supervisors, or employees, or even if the report ultimately is established to be erroneous.
- Any retaliation by a manager, supervisor, or any other employee will be grounds for disciplinary action, up to and including termination.
- If an employee who reports a violation is directly involved in a violation of the law, PSI's IA, Modified Advisory Opinion, or Policies and Procedures, the fact that he or she reported the violation will be given appropriate consideration in any resulting disciplinary action.
- Failure to report wrongdoing of which an employee has knowledge may be a basis for disciplinary action up to and including termination.
- Although PSI will take appropriate disciplinary action where a compliance violation is established, it is possible for someone to unintentionally violate the law or PSI's policies. By reporting suspected violations, an employee may save another employee from repercussions by allowing management to educate that employee concerning the practice in question, helping to ensure that problems are resolved early.

### **Related Information:**

- Policy:
- Procedure: Procedure on Screening Ineligible Persons
- Reference form:
- Education document:
- Script:

### **Contacts:**

- Human Resources
- Compliance Officer
- Program Development Department



Policy Number: **XXX-02.000.000**

- General Manager

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Approved by:  
Date Approved:  
Original Release/Effective Date:  
File location

Revised by:  
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