

Policy/Procedures	POLICY NO:	UOP ACO-COMP-007
WHISTLEBLOWER POLICY	SECTION/OWNER:	CCO
	EFFECTIVE DATE:	01/01/2017
	DATE TO QIC:	01/15/2017
	DATE TO BOARD:	01/31/2017

1.0 PURPOSE

This policy is to provide a process to ensure that UOP ACO maintains and strictly prohibits retaliatory acts by workforce members of UOP ACO against any employee, contractor, UOP ACO patient or other individual for the exercise of any right under, or for participation in any process established by applicable law.

ACRONYMS

ACRONYM	DESCRIPTION
UOP	United Outstanding Physicians
ACO	Accountable Care Organization
CCO	Chief Compliance Officer

DEFINITIONS

TERM	DEFINITION
ACO	A healthcare organization that ties payments to quality metrics and the cost of care. ACOs in the USA are formed from a group of coordinated health care providers.
Workforce	Workforce is defined as employees, volunteers, contractors, and other person whose conduct, in performance of work for UOP ACO, is under the direct control of UOP ACO, whether or not they are paid by UOP ACO.

2.0 ACCOUNTABLE

Chief Compliance Officer, Chief Executive Officer, Executive Director, Chief Operating Officer, Chairman of the Board, Board Members.

3.0 POLICY

It is the responsibility of all workforce members of UOP ACO to report any and all actual or perceived misconduct, including actual or potential violations of law, regulations and/or policies and procedures of UOP ACO.

No workforce member of UOP ACO shall engage in or be a party to, any act(s) of intimidation, bullying, or retaliation against any employee, contractor, UOP ACO patient or other individual for the exercise of:

- i. Any right under, or participating in any process established by federal, state, or local law and or regulation
- ii. Filing a complaint with UOP ACO and/or the Department of Health and Human Services (DHHS);
- iii. Testifying, assisting, or participating in any investigation, compliance review, proceeding, or hearing pursuant to applicable laws and regulations
- iv. Opposing in good faith any act or practice made unlawful by federal, state, or local law, regulation or policy, provided that the manner of the opposition is reasonable and does not itself violate law or regulation
- v. Any workforce member who participates in an act of intimidation, threat, coercion, discrimination against, or takes other retaliatory action against another member of the workforce, individual or other, will be subject to disciplinary action up to and including termination of employment.

4.0 PROCEDURE

UOP ACO will encourage the reporting of problems or concerns to include the actual or perceived violations of this policy through the use of:

- i. The maintenance of an “open-door policy” at all levels of management
- ii. The establishment of a Compliance Hotline
- iii. The establishment of a Compliance Officer
- iv. The establishment of a Compliance Committee
- v. Annual compliance training including (but not limited to):
 - a. code of conduct policy
 - b. reporting of compliance issues policy
- vi. Notice requirements as required by law or regulations

REFERENCES

CMS: https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/sharedsavingsprogram/Quality_Measures_Standards.html

DOCUMENT HISTORY (examples)

DATE	DESCRIPTION OF CHANGE	Accountable
01/01/2017	Original document	AC Director of Clinical Outcomes



UNITED OUTSTANDING PHYSICIANS

UOPACO

ACCOUNTABLE CARE ORGANIZATION

DATE	DESCRIPTION OF CHANGE	Accountable
		& Improvement