

	Strong Home Care Group, Inc.	Corporate Compliance
	POLICY: Internal Reporting/ Investigation & Enforcement of Compliance Issues	Policy #104A
	SECTION: 100A	
	Created: 9/1/98	Reviewed: 12/9/04      Revised:
	Approved by: Quality & Compliance Committee Date: 12/14/06	Reg: COP:

**Policy:** The Organization is committed to prevention, detection and to taking all appropriate action to assure compliance with all legal and regulatory statutes. This policy is a directive for all VNS employees to promote honest and ethical behavior in all work related activities.

**Description:**

**Reporting**

Each VNS employee is obligated to report a violation or suspected violation of the Standards of Conduct or of the law to their supervisor or VP, or directly to the Corporate Compliance Officer. A Compliance Report will document the issue, actions taken and resolution.

*Employees will not be subject to reprisal for reporting, in good faith, actions which they feel violate the law or established standards, neither will he/she be immune, if involved.*

A confidential voice mailbox has been established for reporting purposes. Please note, that while every attempt will be made to maintain anonymity, confidentiality cannot be promised if it appears that a serious violation has occurred. Employees may also approach the Compliance Officer directly to report suspected misconduct, or may submit a report in writing.

**Investigations**

The Compliance Officer, will oversee the investigation of compliance policy violations. It is the responsibility of Administration/Management to ensure that the compliance policies are enforced consistently. All reports will be investigated. Circumstances of the complaint will determine the investigation method used. Methods could include record review, patient and/or employee interviews. Confidentiality will be protected to the extent possible and communication will be on a need to know only basis. Legal counsel will be notified when appropriate.

**Enforcement**

The Compliance Officer and the President of VNS, in consultation with legal counsel if needed, will determine whether and when federal, state or local law enforcement officials should be contacted, including practice boards. The Organization will provide all reasonable assistance to law enforcement officials and regulatory agencies when requested.

When sufficient evidence shows that specific federal or state laws have been violated, VNS will

discipline the person or persons involved. Employees who are guilty of fraudulent acts will be disciplined immediately, including termination when appropriate. Disciplinary procedures will follow the guidelines under existing personnel policies. Disciplinary actions shall be determined on a case-by-case basis at the advice of legal counsel, if needed. Legal action from outside third parties (i.e., governmental agency, law enforcement agency) may include fines, reimbursement of funds, criminal prosecution and imprisonment.

Grievance procedures for opportunities to respond to allegations or evidence of misconduct will follow the guidelines under existing personnel policies.

Once the investigation has been completed and action taken, appropriate measures will be taken to return to normal operations as soon as possible.

### **Follow-up**

After an incident has been resolved, a thorough investigation will be performed to determine how and why the compliance incident could have occurred. This investigation will include all departments and individuals associated with the incident. The outcome of the investigation will be reported to the Professional Advisory Committee, unless disclosure may jeopardize confidentiality or the attorney-client privilege, or is not otherwise warranted.

The Compliance Officer will oversee any need to make policy and procedure modifications with respect to correcting and preventing further misconduct of a similar type as a result of a misconduct investigation.