

Good Faith Reporting Policy

- I. **PURPOSE AND OBJECTIVE:** To promote and foster positive staff and ACO relations through open communication and candid discussions of issues by staff.

- II. **POLICY STATEMENT:**
 - a. Oakwood Accountable Care Organization, LLC. d/b/a Beaumont ACO. (“ACO”) encourages staff to contribute to the continuous improvement of the organization by expressing, in good faith, issues, concerns, opinions and problems affecting the work environment. It is ACO policy that no staff is to be disciplined for making a good faith report of an issue, concern, or problem to any member of management, Human Resources, the Business Practices Office or Legal Affairs that impacts the work environment, ACO’s compliance with laws and regulations, the ACO Code of Conduct or ACO policy and procedure. Management is expected to maintain an “open-door policy” to permit Staff the opportunity to report issues or concerns. For purposes of this Policy, the ACO has contracted with OHI for the above noted services that will be provided through OHI human resource, corporate compliance (Business Practices Office) and legal services staff, as appropriate.

 - b. In addition, it is the policy of ACO that employees, including supervisors, managers and contracted staff, (collectively “Staff”) are responsible for timely reporting of issues or concerns affecting ACO’s work environment, compliance with laws and regulations, the ACO Code of Conduct or ACO policy and procedure. Reports should be submitted to a supervisor, manager, and Human Resources representative, the Business Practices Office or Legal Affairs, as appropriate. Matters that involve a serious present threat to safety, health, or to patient or visitor well-being should be brought through the supervisory chain of command as may be necessary to bring the matter to a satisfactory and timely conclusion.

 - c. This policy shall not serve to exempt Staff from the consequences of his/her own wrongdoing. The fact that the Staff member self-reported should, however, be recognized in determining an appropriate course of action along with other factors.

- III. **PROCEDURE:**
 - a. Staff members are expected to timely report issues or concerns affecting ACO’s work environment, compliance with law and regulation, the ACO Code of Conduct or ACO policy and procedure to a supervisor, manager, Human Resources representative or the Business Practices Officer, as appropriate under the circumstances.

 - b. Supervisors and managers are to take adequate measures to assure Staff that ACO encourages and expects the reporting of issues or concerns.

 - c. Supervisors and managers should maintain and promote an “open-door” attitude. D. Supervisors and managers shall listen to Staff concerns and issues, and work with staff toward appropriate resolution.

- d. A copy of this policy should be available in each ACO division or office as well as available to ACO members and their Staff.

- e. Staff who have issues or concerns should feel free to address those matters with, (in order), their immediate supervisor, department manager, and senior management. A Staff member feeling constrained or uncomfortable in communicating with any of the above may alternatively bring the matter to an appropriate Human Resources representative, the Business Practices Officer (directly or through use of the Hotline) or to Legal Affairs.

Approval

Signature: Belal F. Abdallah

Name: Belal Abdallah, MD

Title: Chairman, Beaumont ACO Board of Managers

Date: 1/1/2019