

## Non-Intimidation & Non-Retaliation

Effective Date: 01/01/2018

### Policy

- A. It is the policy of the ACO to ensure that a Compliance Program exists and includes a practice on non-intimidation and non-retaliation for good faith reporting of compliance concerns.

### Applicability

This policy and procedure applies to all Next Generation Participants, Preferred Providers, Next Generation Professionals and other individuals or entities performing functions or services related to the ACO's activities.

### Procedure

- A. All Next Generation Participants, Preferred Providers, Next Generation Professionals and other individuals or entities performing functions or services related to the ACO's activities, shall have an affirmative duty to report any and all potential incidents of non-compliance to the Compliance Officer.
- B. Any individual reporting potential non-compliance in good faith shall not be subject to any intimidation or retaliation.
- C. Training on the Non-Intimidation & Non-Retaliation Policy will be provided upon hire and annually thereafter.

### Reporting

- A. N/A

### Related Documentation

- A. Next Generation ACO Model Participation Agreement Section XVII.
- B. ACO Terms & Definitions Policy
- C. Compliance Hotline Policy
- D. Compliance Plan