



BAPTIST HEALTH®

Policy		
Category	Orig. Effective Date	Revised & Effective
Legal/Compliance	6.8.2005	6.23.2009
Policy #	Pages	8.31.2012
2313.7	3	10.26.2018
		9.1.2020
		9.1.2021
		8.23.2022

TITLE/SUBJECT	<i>Non-Retaliation Policy for Reporting Suspected Violations of Laws, Regulations, BH Policies, and the Standards of Conduct Described in the BH Corporate Responsibility Program</i>
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PURPOSE

Baptist Healthcare System, Inc. (“BHSI”) has implemented a Corporate Responsibility Program which requires employees to report suspected violations of federal, state and local laws and regulations and encourages employees to voice any concerns about compliance with BH policies and Standards of Conduct described in the BH Corporate Responsibility Program.

There are many complex laws and regulations governing the operations of health care entities, including, but not limited to laws and regulations applicable to coding and billing, financial relationships with physicians and other healthcare providers, patient safety and quality of care, and protecting the privacy and security of patient health information.

BH encourages employees to report suspected violations of federal, state and local laws and regulations as well as problems and concerns without fear of retaliation or retribution provided such reports are made honestly and in good faith. This policy sets forth procedures and guidelines for employees to report any concerns, problems, or suspected violations of laws, regulations, BH policies, or the Standards of Conduct described in the BH Corporate Responsibility Program. For concerns and problems related to employee relations matters (including, as examples, unsafe or unprofessional practice or conduct), employees or contractors rendering services at a BHSI facility are encouraged to first discuss concerns and problems with their supervisor or Human Resources Director at their facility and utilize their facility’s grievance procedures.

SCOPE

Baptist Healthcare System, Inc. [BH] hospitals, Baptist Health Medical Group [BHMG], and all entities or affiliates of which BH is the sole member.

BH hospitals include: Baptist Health Corbin, Baptist Health Floyd, Baptist Health Hardin, Baptist Health La Grange, Baptist Health Lexington, Baptist Health Louisville, Baptist Health Paducah, and Baptist Health Richmond.

POLICY

1. Knowledge of actual wrongdoing, misconduct, or violations of laws, regulations, BH policies, or the Standards of Conduct described in the BH Corporate Responsibility Program must be reported by employees immediately to either their supervisor, management at their facility, their facility's Compliance Officer, or to the Compliance Hotline at 1-800-783-2318. Employees may make a report to the Compliance Line without giving their name.
2. Employees are encouraged to report concerns and questions and suspected misconduct, wrongdoing or violations of law, regulations, or the Standards of Conduct described in the BH Corporate Responsibility Program to either their supervisor, management, Compliance Officer, or to the Compliance Hotline at 1-800-783-2318.
3. Reports of concerns will be maintained confidentially, to the extent reasonably possible except to the extent that disclosure is required in accordance with applicable laws and regulations. Failure to maintain confidentiality of reports of concerns may subject employees to disciplinary action, up to and including potential termination of employment.
4. Employees are encouraged to report employee or patient safety concerns and patient quality of care concerns to either their supervisor, management, Human Resources Director, Compliance Officer, Risk Manager, or to the Compliance Hotline at 1-800-783-2318. Patient safety and quality of care concerns may also be reported to the Joint Commission on Accreditation of Health Care Facilities.
5. Employees should report concerns, questions, or suspected violations of privacy and security regulations and BH policies concerning patient health information to either their supervisor, their facility privacy or security officer, or to the Compliance Hotline at 1-800-783-2318.
6. All BH managers are to maintain an open-door policy and encourage their staff to report suspected violations of laws, regulations, BH policies, or the Standards of Conduct as described in the BH Corporate Responsibility Program and any other concerns and problems without fear of retaliation.
7. All BH employees who report suspected violations, concerns, and problems honestly and in good faith will not be subject to retaliation, retribution, or harassment.
8. No employee is permitted to engage in retaliation, retribution, or harassment against another employee for reporting suspected wrongdoing, misconduct, or violations of law, regulations, BH policies, or the Standards of Conduct described in the BH Corporate Responsibility Program. Employees found to have engaged in retaliation, retribution, or harassment against another employee for making a report shall be subject to disciplinary action, up to and including termination of employment.

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9. Employees cannot exempt themselves from the consequences of wrongdoing by self-reporting. However, self-reporting may be taken into account in determining the appropriate disciplinary action.
10. All reports of wrongdoing, misconduct, or violations of laws, regulations, BH policies, or the BH Standards of Conduct shall be promptly investigated and remedial and/or disciplinary action taken, if appropriate.

APPROVAL



Gerard Colman
Baptist Health
Chief Executive Officer

Date: August 23, 2022

The policies and procedures set forth in this Policy do not establish a standard to be followed in every situation. It is impossible to anticipate all possible situations that may exist and to prepare policies for each. This Policy should be considered guidelines with the understanding that adaption from the Policy may be required at times. Accordingly, it is recognized that clinicians providing healthcare are expected to use their own clinical judgment in determining what is in the best interests of the patient based on the circumstances existing at the time. If this Policy contains reference to clinical literature, the literature cited is only intended to support the reasoning for adoption of certain guidelines contained herein. It is not an endorsement of any article or text as authoritative. Baptist Health specifically recognizes there may be articles or texts containing other valid opinions which would support other care or actions, given a particular set of circumstances. No literature is ever intended to replace the education, training and experience, or exercise of judgment of the healthcare providers.