 <p>KMTSJ, Inc.</p>	DEPARTMENT:	Compliance
	SUBJECT:	Compliance Concern Communications
	PRODUCT LINE:	All
	POLICY NUMBER:	CP11
	ORIGINAL POLICY EFFECTIVE DATE:	02/07/2006
	LAST REVISED DATE:	02/01/2023
	LAST REVIEWED DATE:	02/01/2023

SCOPE: To ensure Group Health Cooperative of Eau Claire (the Cooperative) and KMTSJ, Inc. (KMTSJ) are in compliance with State and Federal mandates and regulations as it pertains to communication and investigation of compliance issues.

POLICY: It is the policy of the Cooperative and KMTSJ to provide employees, directors, providers and Cooperative members with a method of communicating compliance concerns to the Executive Director of Compliance, Director of Compliance, their team lead, supervisor, manager or director, or through our anonymous reporting. The compliance communication procedure is one of the fundamental elements in the overall compliance program.

PROCEDURE:


Employees, directors, providers and members are all personally accountable for their decisions made and actions taken. It is critical that each person understands the laws, company policies and obligations that apply to each specific role and the organizations’ lines of business. The compliance communication procedure has been designed to provide clarification in the event of any confusion or question related to any aspect of the overall compliance program. Specifically, this procedure addresses:

- How to report potential compliance violations;
- How to seek clarification from the Executive Director of Human Resources, Executive Director of Compliance, Director of Compliance, or an employee’s team lead, supervisor, manager or director regarding a company policy or issue that may be in violation of applicable law or policy.

How to Report Potential Violations and Types of Issues Subject to Reporting

Any employee, director, provider or member may report any activity that appears to violate the Cooperative’s or KMTSJ’s Compliance Program or applicable laws. **Note: this includes any legal/regulatory compliance issues and questions related to, or violations of, company policy (harassment, threats/intimidation, discrimination, fraud/waste/abuse, financial mismanagement, privacy violations, etc.).**

Upon becoming aware of a known or potential compliance violation, the matter must be reported within one (1) business day through any one of the methods described below. It is important to remember that having knowledge of a potential compliance violation and choosing not to report it equally implicates the person who refrains from coming forward.

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Confidentiality & Non-Retaliation

All reports are treated confidentially to the extent possible. It is important to note, however, that the Cooperative and KMTSJ can never guarantee 100% confidentiality as during the course of an investigation, your identity may become known, and/or certain issues may require reporting to outside entities, who may investigate independently.

If, upon investigation, it is determined that an allegation of violation of law, company policy/procedure, or the Cooperative and KMTSJ compliance program was made maliciously or in bad faith, or with knowledge of the falsity of the report, the alleging party is subject to disciplinary action up to and including termination. However, in accordance with the Cooperative and KMTSJ policies and applicable law, **any party who files a complaint regarding a violation or suspected violation in accordance with policy and applicable law, when done in good faith and with reasonable grounds to believe a violation may have occurred or may be occurring, will be protected from retaliation or adverse employment action.**

Tracking & Reporting Mechanisms

All potential violations are logged and the appropriate action is taken to review and/or investigate the report promptly. Contact any of the following resources, *immediately*, if you have knowledge or concern regarding a potential violation:

1. Your department manager/director/supervisor/team leader.
2. The Executive Director of Compliance or Director of Compliance (toll free at (888) 203-7770).
3. The Executive Director of Human Resources (toll free at (888) 203-7770).
4. Use the Cooperative's and KMTSJ's **anonymous** toll-free hotline phone number, fax, email, or internet reporting tools. **The Syntrio Lighthouse reporting mechanisms are absolutely anonymous and your identity will not be disclosed to the Cooperative or KMTSJ unless you request it to be.**

SYNTRIO LIGHTHOUSE ANONYMOUS REPORTING:

Telephone:


English speaking USA and Canada: (877) 472-2110 (not available from Mexico)

Spanish speaking North America: (800) 216-1288 (from Mexico user must dial 001-800-216-288)

E-mail: reports@lighthouse-services.com

Website: <http://www.lighthouse-services.com/group-health>

Fax: (215) 689-3885

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***If reporting via Syntrio Lighthouse, please include the company name (Group Health Cooperative of Eau Claire or KMTSJ) along with the details of the issue (who, what, when, how, why) as anonymous reports are very hard to investigate.**

In the most extreme circumstances, if a person is unable to report a potential compliance violation within the confines of the company or anonymously, the issue may be directly reported to the Office of the Inspector General (OIG) by calling:

1-800-447-8477 (1-800-HSS-TIPS)

Such reporting should only be considered when all other reporting attempts have failed to produce action or at minimum, an investigation into the matter.

Reference Source, if applicable: Federal Register / Vol. 64, No. 219 / Monday, November 15, 1999 / Notices




APPROVED: _____ DATE: 02/01/2023

Formal policies and procedures require department manager review, approval and signature. Executive and/or administrative policies and procedures require CEO/General Manager review, approval and signature.

REVISION HISTORY:

Rev. Date	Revised By/Title	Summary of Revision
05/20/2010	Mark Peterson	
6/09/2010	Mark Peterson	
01/25/2013	Jennifer Rust Anderson, Compliance Manager	
06/14/2013	Jennifer Rust Anderson, Compliance Manager	Updated branding/template; wording clarification; removed reference to maintenance of a log regarding policy clarifications.
07/27/2015	Jennifer Rust Anderson, Compliance Officer	Updated Compliance Manager to Compliance Officer

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07/01/2019	Sarah McCracken, Compliance Manager Nick Christensen, Compliance Coordinator	Small grammatical changes. Updated Compliance Officer to Compliance Manager. Added Compliance Coordinator as way to report violations.
07/27/2021	Sarah McCracken, Director of Compliance/Government Programs	Updated titles and roles-Director and Manager
07/15/2022	Sarah McCracken, Ex. Dir. Of Compliance	Updated titles; updated to Syntrio Lighthouse for clarity
02/01/2023	Terri Hernandez, Director of Compliance	Updated titles and removed committee reference