



POLICY # COMP-DMG-006		Revision: 4.0	Page 1 of 3
TITLE: Reporting Potential Compliance Violations			
Department: Compliance (Team Quest)		Effective date: February 2014	
<p><i>Teammates must promptly report all potential violations of the Code of Conduct, DMG policies and procedures and/or applicable laws or regulations. Reports should be made to the compliance department (Team Quest), or the Compliance Hotline, 1-855-236-1448, www.healthcarepartners.ethicspoint.com. In accordance with DMG's Non-Retaliation policy, DMG will not tolerate any form of retaliation against anyone who files a compliance report in good faith. Questions regarding any compliance policy may be directed to Team Quest.</i></p>			

1. PURPOSE

The purpose of this policy is to provide guidelines for reporting potential violations of DaVita Medical Group's (DMG) Code of Conduct (Code), compliance policies and procedures, and/or applicable laws or regulations, in line with the disclosure program developed by DMG.

2. SCOPE

This policy applies to DMG and, subject to approval by the chief compliance officer (CCO) or his/her designee; it may be customized by a business unit-specific policy(ies).

3. DEFINITIONS

Term	Definition
Compliance Hotline	A toll-free number and web portal managed by a third party on behalf of Team Quest which allows DMG Teammates, Guest Teammates, patients, physicians, vendors, or other third parties to report, in Good Faith, Potential Compliance Violations. <ul style="list-style-type: none"> Toll-free number: 855.236.1448 Web portal: www.healthcarepartners.ethicspoint.com
Contracted Provider	Any individual or entity under an arrangement to provide healthcare services to DMG patients or patients attributed to DMG. A Contracted Provider does not include any individual employed by DMG (including employees of a medical group(s) managed by DMG).
Good Faith	Truthful, and without malice or ill intent. A complaint, disclosure or report must be based on a reasonable belief that a Potential Compliance Violation has occurred or might occur.
Guest Teammate	Any temporary worker, agency employee or contract employee who temporarily works on behalf of DMG.
Potential Compliance Violation	Any act, conduct, event or situation that involves, or might result in, a potential violation of DMG's Codes, compliance policies and procedures or other compliance-related directives, and/or applicable laws and regulations, including those that apply to federal and state health care programs.
Reporter	A DMG teammate, patient, physician, vendor, Guest Teammate, Contracted Provider or external agent who acts on behalf of DMG, who reports a Potential Compliance Violation, verbally or in writing, through any mechanism or communications channel, including the Compliance Hotline.

Term	Definition
Retaliation	Adverse employment action and/or other adverse treatment such as intimidation, threats, coercion, or discrimination against a Reporter.

4. POLICY

- 4.1. It is every teammate's responsibility to inform DMG of Potential Compliance Violations. Reports must be made to a teammate's manager, a member of senior management, a member of the DMG legal department, a member of Team Quest, or the Compliance Hotline.
- 4.2. DMG has established a disclosure program, which includes a mechanism for reporting Potential Compliance Violations, confidentially and anonymously. That mechanism is the Compliance Hotline.
- 4.3. DMG strives to maintain the confidentiality of teammates who report Potential Compliance Violations. However, the identity of the individual making the report may become known or need to be revealed if required under applicable laws and regulations (e.g., in the event of a government investigation). Refer to the [Non-Retaliation for Reporting Potential Compliance Violations policy](#).
- 4.4. Self-reporting is encouraged and is consistent with DMG's commitment to legal and regulatory compliance and transparency with stakeholders. Although self-reporting may be taken into account in determining what, if any, disciplinary action is appropriate or warranted, it will not exempt or insulate teammates from any such action.
- 4.5. Upon receiving a disclosure or report of a Potential Compliance Violation, the CCO, or his/her designee, gathers all information from the disclosing individual and makes a preliminary good faith inquiry in to the allegations to ensure that Team Quest has obtained all of the information necessary to determine whether a further review should be conducted.
- 4.6. DMG conducts an internal review of every disclosure or report that is sufficiently specific to reasonably permit a determination of the appropriateness of the alleged misconduct or improper practice. Upon the conclusion of the internal review, as appropriate and warranted, Team Quest ensures that proper follow-up is conducted, including self-disclosures to government agencies as required by laws and/or regulations. This may include:
 - 4.6.1. Reporting violations of law or regulation to health plans as required by individual health plan contracts; and
 - 4.6.2. Providing non-privileged information about investigations to contracted health plans as required by individual health plan contracts.
- 4.7. DMG prohibits Retaliation against anyone who, in Good Faith, reports a Potential Compliance Violation, in accordance with the [Non-Retaliation for Reporting Potential Compliance Violations policy](#).
- 4.8. Reports must be made regardless of when the conduct occurred or whether the conduct has ended or remains ongoing. Managers who receive from a teammate a report of a Potential Compliance Violation must promptly refer the disclosure to Team Quest.

5. APPLICABLE DOCUMENTS

- [Code of Conduct](#)
- [Compliance Policies and Procedures](#)
- [Non-Retaliation for Reporting Potential Compliance Violations policy](#)

6. REVISION HISTORY

REVISION HISTORY			
Doc. Revision	Description	Revision Date	Last Date Reviewed
1.0	Policy Creation	Feb 2014	Feb 2014
2.0	Revised	Apr 2015	Apr 2015
3.0	Revised and Rebranded to DaVita	Jun 2017	Jun 2017
4.0	Rebranded to DMG	Jan 2018	Jan 2018