



Title: Duty to Report Non-Compliance Policy

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Date Approved by IPA Board of Directors: July 21, 2026

Policy# CC5

Purpose:

To ensure Affected Individuals of the Care Compass Entities understand reporting obligations and processes involved with reporting non-compliance.

Definitions:

Affected Individual(s): All persons who are affected by Care Compass Entities' risk areas including Care Compass Entities' employees, officers, Directors, managers, contractors, agents, subcontractors, independent contractors, governing bodies, or third-parties, who or that, in acting on behalf of the Care Compass Entities: (i) delivers, furnishes, directs, orders, authorizes, or otherwise provides health or social care items and services under State, Federal, or Care Compass programs; and (ii) contributes to the Care Compass Entities' entitlement to payment under Federal health or social care programs, or from other payor sources.

Care Compass Entities: Organizations that are directly, or indirectly through one or more intermediaries, owned or controlled by, or are under common ownership or control of, Care Compass Network, including Care Compass Collaborative, Inc. and Care Compass Supporting IPA, LLC.

Participant: Any organization that has signed an agreement related to a funded program with the Care Compass Entities.

Staff: Employees, contractors, agents, consultants, volunteers, and others who act on the Care Compass Entities' behalf.

Policy:

The Care Compass Entities are committed to conducting its business in a manner that complies fully with applicable laws, regulations, guidance, program requirements, and the Care Compass Entities' Codes of Conduct. Affected Individuals must report suspected unethical or illegal conduct, in order to support this commitment and to protect the Care Compass Entities' reputations. No retaliatory action shall be taken against any individual who, in good faith, reports suspected or known instances of non-compliance.

I. Affirmative Duty to Report

- a. Affected Individuals who are aware of or suspect a violation of law, regulation, guidance, program requirements, or the Care Compass Entities' Codes of Conduct, other standards, or policies and procedures, have an affirmative duty to report this information without

regard to the identity or position of the suspected offender. Staff job descriptions, Vendor Contracts, and/or agreements related to a funded program with the Care Compass Entities will contain a provision reflecting this duty.

- b. In general, reports should be made to the Staff member's supervisor or through the normal chain of command. However, Affected Individuals may also report the information directly to the Director of Compliance.

II. Anonymous Reporting

- a. To make a report anonymously, Affected Individuals may report through the online Compliance Hotline at <https://bit.ly/CareCompass-Compliance> to communicate information directly to the Director of Compliance.
- b. The Care Compass Entities will make every effort to treat reports confidentially and to protect the anonymity of the Affected Individual who reported the information. However, under some circumstances, the reporter's identity may need to be disclosed to the Care Compass Entities Compliance Committee, a relevant Board of Directors, or reporting authority as part of the Care Compass Entities' appropriate response to allegations of non-compliance.

III. Non-Retaliation

- a. No retaliatory action will be taken or allowed against any Affected Individual who, in good faith, reports suspected or known instances of non-compliance.
- b. Appropriate disciplinary action, up to and including termination from employment, removal from an appointed position, or removal from participation with the Care Compass Entities, shall be taken against any Affected Individual found to have retaliated against any individual or entity who reported in good faith.

IV. Prohibition of False Reporting

- a. To protect the integrity of the Care Compass Entities and prevent unwarranted reputational damage, the Care Compass Entities strictly prohibit making false, misleading, or bad-faith reports of non-compliance. False, misleading, or bad-faith reports include but are not limited to reports made with deliberate disregard for the truth, knowledge that the information is baseless, or a malicious intent to harm another individual.
 - i. The following disclaimer shall be included on the Care Compass Entities reporting forms: *"By submitting this report, you certify that the information provided is true, accurate, and complete to the best of your knowledge. We investigate all reports thoroughly. Making a false or malicious report is a serious violation of Care Compass policy and may result in disciplinary action, up to and including termination of employment, and potential legal action."*
- b. Appropriate disciplinary action, up to and including termination from employment, removal from an appointed position, removal from participation with the Care Compass Entities, or possible civil and/or criminal liabilities, shall be taken against any Affected Individual found to have knowingly made a false report.

V. Failure to Report

- a. Proven failure to report misconduct may result in disciplinary action, up to and including termination from employment, removal from an appointed position, or removal from

- participation with the Care Compass Entities, against Affected Individual who failed to report the misconduct.
- b. In addition, managers, supervisors, and Participants may be sanctioned for failing to detect non-compliance with applicable laws or policies and procedures where reasonable diligence on the part of the manager, supervisor, or Participant would have led to the discovery of a problem or violation.

CCN Board Approval History: 3/11/2015, 12/8/2015, 11/8/2016, 12/21/2017, 2/12/2019, 11/10/2020, 11/9/2021, 11/8/2022, 8/08/2023, 8/13/2024, 6/10/2025, 8/11/2026

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Policy Revisions:

Date	Revision Log	Updated By
3/1/2015	Original creation	Ann Homer
11/19/2015	Updated to reflect Care Compass Network organization structure	Rebecca Kennis
10/28/2016	Updated to reflect addition of appropriate disciplinary action and added Board Review History	Andrea Rotella
11/17/2017	Updated with changes by the Compliance and Audit Committee	Andrea Rotella
1/18/2019	Updated definition of “staff” and other changes by the Compliance and Audit Committee	Andrea Rotella
3/12/2021	Updated with changes to the Compliance Hotline	Cathy Petrak
9/1/2021	Removed references to PPS and added reference to the Open Network Participation Agreement	Cathy Petrak
8/29/2022	Added Partner definition and updated Partner Organization to Partner throughout	Cathy Petrak
7/12/2023	Added “Affiliated Entities” throughout to update to an enterprise-wide policy; updated Partner to “Participant” definition and term throughout; updated Corporate Compliance and Privacy Officer title to “Director of Compliance” throughout; updated compliance hotline web address	Cathy Petrak
5/7/2025	Updated “Affiliated Entities” to “Care Compass Entities” throughout and added “Affected Individuals” definition and updates throughout	Cathy Petrak
5/27/2026	Added Section IV – Prohibition of False Reporting to prohibit false, misleading, or reports of non-compliance in bad-faith, to include disciplinary actions for false reports, and reporting form disclaimer language	Cathy Petrak

This Policy shall be reviewed periodically, but not less than once every 12 months, and updated consistent with the requirements established by the Board of Directors, Care Compass Network's Leadership Team, Federal and State law(s) and regulations, and applicable accrediting and review organizations.