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| **MONTCALM CARE NETWORK**  **611 North State Street, Stanton, MI 48888** |  |
| SUBJECT: Internal Compliance Reporting | Section: 11110 |
| Effective Date: October 22, 2002 | Revised Date: May 24, 2022 |

In order to effectively enforce the compliance program and incorporated policies, Montcalm Care Network (MCN) expects its employees and subcontractors to report perceived violations of the program, and/or applicable Federal, State and third-party payor rules to the MCN Compliance Officer.

Employees and subcontractors may report any compliance-related concerns by any method, including:

1. drafting a written note and placing it in a sealed envelope marked “CONFIDENTIAL” and placing such envelope in the MCN Compliance Officer’s internal mailbox
2. directly speaking to the Compliance Officer in person or by phone, and making such report verbally
3. completing an Office of Corporate Compliance "Issue of Concern Reporting Form" and placing it in a sealed envelope marked "CONFIDENTIAL" and placing such envelope in the Compliance Officer's internal mailbox or emailing it to the Compliance Officer's internal email box; or
4. contacting the Regional Compliance Officer or another Compliance Officer within the service region either by phone or mail.

All reports of compliance-related concerns will be taken seriously and investigated. The Compliance Officer will look into all reports made and respond within five (5) business days whenever possible. Any reported concerns seeking advice or clarification or reported concerns with information that is too sparse to act upon will be handled accordingly. Substantiated complaints of fraud and abuse will be reported to the appropriate regional and state authorities as required.

Human Resource issues shall be reported to the Human Resources Coordinator. When applicable and appropriate, the Human Resource Coordinator and Compliance Officer shall coordinate investigation procedures.

Compliance concerns involving consumer rights or services shall be reported to the Recipient Rights Officer. When applicable and appropriate, the Recipient Rights Officer and Compliance Officer shall coordinate investigation procedures.