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**Owner:** *Laura Carrico: Director of Compliance*  
**Area:** *Corp CCE - Corporate Compliance & Ethics*  
**References:**

## Confidential Disclosure Program

American Health Partners ("AHP") has established a Confidential Disclosure Program for all employees of all subsidiaries to report known or suspected conduct or activities by any person engaged in the performance of duties for the organization that violates the Code of Conduct, any Compliance Policy, HIPAA Privacy Policy, or any federal state, or local laws, rules, and regulations. This program may also be used for individuals who are uncertain whether an action violates the Code and would like to communicate with the organization on a confidential basis.

### Policy

AHP maintains a hotline answered by a third-party vendor. This enables individuals to disclose to the Chief Compliance and Ethics Officer or some other person who is not in the disclosing individual's chain of command, any identified issues or questions associated with AHP's policies, conduct, practices, or procedures with respect to a Federal health program d by the individuals to be a potential violation of criminal, civil, or administrative law. AHP policy, the Deficit Reduction Act, the Fraud Enforcement Recovery Act, the False Claims Act, and other state and federal laws provide protection from retribution or retaliation against any person for reporting actual or suspected violations for of the Code of Conduct, law, or policy. Any supervisor who attempts to divert, discourage or retaliate against an employee for reporting a compliance concern will be subject to discipline, up to and including termination.

### Procedure

Prompt, appropriate, confidential investigations into all calls, letters, and other forms of communication, both direct and indirect, will be made. The Chief Compliance and Ethics Officer will coordinate any findings from the investigations and recommend corrective and/or disciplinary actions. All employees are required to cooperate with investigation efforts. All issues reported through the Confidential Disclosure Program are maintained including a summary of the disclosure, the status of the internal review, and any corrective action taken.

## Attachments:

No Attachments

### Approval Signatures

Approver	Date
Ben Sparks: AGC [LC]	04/2019
Laura Carrico: Director of Compliance	04/2019
Kelly Thomas: Chief Compliance & Ethics Officer [LC]	04/2019

Approver	Date
Laura Carrico: Director of Compliance	04/2019