

	PCHP.CP.109 Policy for Non-Retaliation V2 PCHP.CP.109	
	Name:	PCHP.CP.109 Policy for Non-Retaliation
	ID Number:	PCHP.CP.109
	Approval Date:	01/19/2017
	Approved By:	Compliance Committee

Body

Policy Name: Non-Retaliation for Reporting Issues of Non-Compliance or FWA

Scope: Entire Piedmont workforce

Purpose: To establish policy to encourage employees to communicate problems, concerns and opinions without fear of retaliation or retribution in accordance with Federal law and CMS guidelines.

Definitions & Acronyms:

CMS: Centers for Medicare & Medicaid Services

CFR: Code of Federal Regulations

PBM: Pharmacy Benefit Manager

FWA: Fraud, Waste and Abuse

Piedmont: "Piedmont" collectively refers to Piedmont Community Health Plan (PCHP), Piedmont Community HealthCare (PCHC) and any future entities that are owned, affiliated with and/or operated by Piedmont

Policy:

1. Piedmont and parent company Centra prohibit retaliation against any employee for reporting in good faith a potential or suspected violation of policy, law or regulation. In no event will Piedmont or Centra take or threaten any action against an employee as a reprisal or retaliation for reporting information in good faith.

Procedures:

1. As a subsidiary and affiliate of Centra, Piedmont follows Centra's policy on Non-Retaliation and Non-Retribution for Reporting **AC-2013.08**.

Equipment: None

Forms and Letters: None

Reference(s): [42 CFR Sections 422.503\(b\)\(4\)\(vi\)\(D\), 423.504\(b\)\(4\)\(vi\)\(D\)](#); Medicare Managed Care Manual, Chapter 21 and Prescription Drug Benefit Manual, Chapter 9 (Rev. 1-11-13) – Compliance Program Guidelines, Section 50.4; Compliance 101 Second Edition Copyright 2006

Interdisciplinary Review: None

Policy History

Date	Revision No.	Reason for Change	Sections Affected
01/11/2013	NEW		All
03/04/2014	NEW	Annual Review. No changes.	None
02/16/2014	1.0	Updated to incorporate/replace with Centra's policy.	All
01/21/2016	2.0	Converted Policy to Centra format	All

12/30/2016	3.0	Removed reference to attachment, and removed attachment, replaced with Centra Policy Number	Procedure
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