

PITTSBURGH CARE PARTNERSHIP, INC.
COMMUNITY LIFE PROGRAM
POLICY AND PROCEDURE MANUAL

SUBJECT: Reporting and Non-Retaliation

NUMBER: 1005
REG. REF.:

CROSS REFERENCE NUMBER: 1824

POLICY/PURPOSE/SCOPE

It is the policy of the Community LIFE to have a system in place to allow its workforce employees and others to report, in good faith, instances of wrongdoing without fear of retaliation.

Community LIFE employees have a responsibility to report, in good faith, instances of wrongdoing to the appropriate Community LIFE personnel or to appropriate officials.

All recipients of such reports are prohibited from engaging in retaliation against anyone who in good faith reports an instance of wrongdoing.

DEFINITION/GUIDELINES

The Pennsylvania Whistleblower Law defines “wrongdoing” as “a violation which is not of a merely technical or minimal nature of a federal or state statute or regulation, of a political subdivision ordinance or regulation or of a code of conduct or ethics designed to protect the interest of the public or the employer”.

Community LIFE encourages its employees, agents and others to report instances of wrongdoing.

PROCEDURE

1. Employees shall report any good faith concerns of real or alleged wrongdoing.
2. Employees should first contact their manager to make the report. If an employee is uncomfortable with or is unable to follow the chain of command, the Employee should contact the Human Resources Manager or Corporate Compliance Officer.
3. If an employee is uncomfortable contacting the internal resources above, the employee can make a report by calling the Compliance Hotline (1-877-785-0006).
4. Contract health providers, enrollees or their responsible parties should contact the Corporate Compliance Officer (412-436-1344) or the Compliance Hotline (1-877-785-0006).
5. All recipients of such reports are prohibited from engaging in retaliation against anyone who in good faith reports an instance of wrongdoing. All suspected or alleged instances of retaliation shall result in a complete investigation of the circumstances. Such an investigation will involve the appropriate Community LIFE personnel.

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6. If it is determined that an individual(s) has engaged in such retaliation against an individual who in good faith makes a report, Community LIFE shall take appropriate corrective action against the individual, up to and including termination and in accordance with Community LIFE policies and procedures.
7. Likewise, an individual who knowingly and intentionally makes false allegations of an instance of wrongdoing shall also be subject to corrective action, up to and including termination, in accordance with Community LIFE policies and procedures.

ORIGINAL DATE: January 4, 2007
REVISED DATE:
PRECEDING REVISION DATE: