

		Matter of Care Home Health Services	
Policy Name: Whistleblower Policy		Policy/Procedure Number:	MoC-COM002
Policy Owner: Director of Compliance		Issue Date:	June 26, 2025
Approval:  <hr/> Alicia Nelson Jones Chief Compliance Officer		Department Review/Revision Date(s):	
		Approval Date:	June 26, 2025
		Primary Department/Discipline: Compliance Department	
		Involved Departments/Disciplines: All Departments/Disciplines	

Purpose:

To provide guidance which advises employees on the process to report any possible violation of federal or state laws or regulations, the organization’s Policies and Procedures, or the Code of Conduct, in good faith, without fear of retaliation or intimidation.

Definitions:

“Whistleblower”- is an employee, former employee, or participant of the organization who reports misconduct to people or entities that have the power to take corrective action. The Whistleblower is protected by law from intimidation, threats and retaliation.

“Employee”- means a person who performs a service for wages or other remuneration under a contract of hire, written or oral, express or implied, for the organization.

Policy:

The organization will not tolerate any form of retaliation or intimidation against an individual (**whistleblower**) who raises questions or concerns about misconduct and who in good faith reports a compliance concern. Retaliation and/or intimidation in any form are strictly prohibited and are themselves a violation of the Code of Conduct and the Compliance Program Plan.

Procedure:

1. All supervisors, managers, directors and officers of the organization are responsible for maintaining an environment where employees are encouraged to raise concerns and

questions. An “open-door” policy shall be maintained at all levels of management for employees to report problems and concerns.

2. All employees are required to report good faith concerns about actual, potential or perceived conduct that does not conform to applicable laws, regulations, or the organization’s policies.
3. All managers and supervisors must encourage the reporting of problems as well as provide information on the methods for reporting concerns including to a Supervisor, the Compliance Hotline at 1-855-231-0616 or by logging on to <https://centerlight.alertline.com> to submit a report or by contacting the Compliance department.
4. The whistleblower is not responsible for investigating the alleged illegal or dishonest activity, or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.
5. Any “whistleblower” who feels that he or she is being retaliated against or intimidated should contact the Compliance Officer immediately. All reports of retaliation or intimidation will be promptly investigated by the Compliance Office. Any concerns that are substantiated will be addressed in conjunction with the Human Resources Department and corrective action taken to resolve any issues.
6. The Compliance Officer or designee will collaborate with Human Resources to determine the appropriate disciplinary action if it is determined that an act of retaliation or intimidation has occurred. Any employee, including senior management, who commits or condones retaliation or intimidation, will be disciplined, up to and including termination.

Oversight Process:

The Compliance Officer or designee will monitor the activities regarding any and all complaints of retaliation and/or intimidation as set forth within this policy. Other departments shall comply with any requests made by the Compliance Officer or designee as part of the conduct of such monitoring. Similarly, the Compliance Officer or designee shall be provided with the complete access to all administrative, management, budget and financial information related to any business inquiries provided under this policy.

Any questions regarding the application of this Policy and Procedure should be referred to the organization’s Compliance Department.