 <p>Heritage Provider Network &amp; Affiliated Medical Groups</p>	Program: HIPAA Compliance		
	Policy No.	Effective Date: 01/01/2012	Page - 1 -
	Authored by: Compliance Sub Committee	Date: 01/01/2012	Revised by: Sandy Finley
	Approved by: Compliance Committee	Date: 02/02/2015	Date: 02/02/2015
Title of Policy: Whistleblower Protection			

**PURPOSE:**

To encourage all employees, business associates, and FDRs to report any suspected concerns of non-compliance; and to safeguard them against retaliation from good faith reporting.

**POLICY:**

In accordance with HIPAA/HITECH laws and other state and federal regulations, this policy has been created to provide clear notification to employees that there will be no retaliatory action or negative employment consequences of any kind in response to “whistleblowers,” or any employee who brings forth information about breaches in patient privacy issues and related matters.


**RESPONSIBILITY:**

Compliance Officer, Corporate Compliance Officer, Director of Human Resources, all Employees and all Business Associates

**PROCEDURES:**

Whistleblower Protection policy is comprised of the following provisions:

1. Employees are directed and encouraged to bring forth information pertaining to breaches in patient privacy issues, non-compliance, and other related matters.
2. Employees are provided with compliance training in accordance with local, state and federal laws, including HIPAA/HITECH and FWA laws, and are required to follow those guidelines.
3. If at any time, an employee or group of employees becomes aware of any breach of patient privacy issues or related matters, they are directed to bring their concerns immediately to the attention of their supervisor, the company’s Compliance Officer, Director of Human Resources or any member of the company’s Senior Management Team.
4. Employees may report suspected violations of compliance, including patient privacy breaches, fraud, waste, and abuse, and other issues of non-compliance by:
  - a. Reporting to employee’s supervisor
  - b. Notifying group’s Compliance/Privacy Officer
  - c. Calling the Corporate Compliance Hotline: 855-682-4127
  - d. Mailing a written complaint to: HPN Corporate Compliance Officer, P.O. Box 7007, Lancaster, CA 93539

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5. All reporting remains confidential (up to the limits of the law and as investigation allows) and may be reported anonymously.
6. No retaliation of any kind will be given to a “whistleblower” who brings forth information about breaches in patient privacy, non-compliance, and other related matters.

REFERENCE: 45 CFR § 164.530