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Policy Title: Whistleblower Policy
Policy Manual: Administrative Manual- Corporate Compliance
Policy Number: AP 1275

Operations Director: Chief Compliance Officer
Policy Owner: Compliance Specialist
Last Approved Date: January 2022

Purpose: Covenant HealthCare System and its wholly owned tax-exempt entities, including without limitation Covenant Medical Center, Inc. (collectively referred to as "Covenant") is committed to lawful and ethical behavior in all of its activities and requires its employees, independent contractors, officers, and board members to conduct themselves in compliance with all applicable state and federal laws and regulations as well as Covenant policies. In keeping with this commitment, Covenant expects all employees, independent contractors, officers, and board members to report suspected violations of law or policy to the Chief Compliance Officer, a Compliance Specialist, or the Covenant Chairperson of the Board.

Policy: An employee, independent contractor, officer, or board member shall, in good faith, make a confidential report of a suspected violation of law or policy to the Chief Compliance Officer or Compliance Specialist. In the event that the suspected violation involves the action or inaction of the Chief Compliance Officer or Compliance Specialist, or the Chief Compliance Officer or Compliance Specialist is otherwise known or believed to have a relevant conflict of interest, the complaint shall be made to the Chairperson of the Board by contacting the CEO's Executive Assistant. If it is felt that it is not reasonable to make the report to the Chief Compliance Officer, Compliance Specialist, or Board Chair, the report may be made to any Board member (also by contacting the CEO's Executive Assistant) or alternatively, by phone or internet submission to the Compliance Hotline at 844.570.SAFE with code **010585**, or www.SafeWhistle.com with code **acl326**. Any report may be made anonymously. The report must be made in good faith, which means that the report is based on an honest belief, formed after a reasonable effort has been made to collect the relevant facts, that a violation of law or policy has or is about to occur. A report that is made with reckless disregard or with willful ignorance of the facts will not be considered a good faith complaint and may subject the complainant to disciplinary action by Covenant.

Examples of matters that must be reported include, but are not limited to: financial irregularities including gross mismanagement of federal funds received by Covenant pursuant to the American Recovery and Reinvestment Act; irregularities in billing, claims submission, provider payments, cost reports, and I.R.S. Form 990 reports; inappropriate

workplace conduct including discrimination and harassment and other suspected violations of state or federal laws; as well as suspected violations of Covenant policies. This policy is intended to incorporate and augment other Covenant whistleblower policies, including without limitation, the Covenant HealthCare Corporate Compliance Code of Conduct and Non-Retaliation for Reporting, Policy Number AP1230.

Process: The Chief Compliance Officer, Compliance Specialist, or Chairperson of the Board (or other Board member receiving a report) must promptly acknowledge, document, and investigate the complaint. The investigation shall be done in such a manner to protect the confidentiality of the complaint and the complainant to the extent possible. If the Chief Compliance Officer, Compliance Specialist or Chairperson of the Board believes that a violation of state or federal law may have occurred, that individual must notify Covenant’s legal counsel immediately. If the complaint involves a violation of a Covenant policy, the Chief Compliance Officer, Compliance Specialist, or Chairperson of the Board will initiate the required disciplinary procedures as prescribed by Covenant policies.

Protections: No employee, contractor, officer, or director will be discharged, threatened, or discriminated against in any manner by Covenant for reporting, in good faith, what he or she perceives to be a violation of state or federal law or Covenant policy.

In addition to the protections provided by this policy, whistleblower protections are also available under state and federal laws, including without limitation: the Federal False Claims Act, 31 U.S.C. § 3729(a); the Michigan Medicaid False Claims Act, M.C.L. § 400.610(c); the Michigan Health Care False Claims Act, M.C.L. § 752.1008, the Internal Revenue Code § 7623(b), the Civil Rights Act of 1964, 42 U.S.C. § 2000e and the Michigan Whistleblower’s Protection Act, M.C.L. § 15.361.

Whistleblower Contact Information

Chief Compliance Officer:	989.583.4655 or 989.583.4582
Senior Compliance Specialist:	989.583.4580
Compliance Hotline via website:	www.SafeWhistle.com with code acL3Z6
Toll-free Compliance Hotline:	844.570.SAFE (7233) with code 010585

Related Policies, Procedures, Guidelines:

- Administrative Manual # 1230 – [Non-Retaliation](#)
- Administrative Manual # 1220 – Hotline Calls – Internal Handling

Origination: October 2009
Next Review Date: January 2025
Revised: January 2022
Reviewed by: Corporate Compliance
Executive Team
Board of Directors

Approved by:

Kevin Birchmeier – Executive Vice President/Operations

January 2022
Date