

## Overview

The revisions below were made on **March 19, 2024**.

**Document Name:** Internal Reporting Obligations and Investigations Policy

**Document Owner:** Jeff Felty, Chief Compliance Officer

**Document Approver:** David Harbour, Chief Executive Officer

## Stakeholders

The individuals and/or groups affected by this update:

- All Centria team members and business associates


## Summary / Nature of the Update

Added contents to the "Outside Agencies" section.

## Detailed Updates by Page

The table below describes the updates made by page number.

Page Number	Update
2	Added final paragraphs to the end of the "Outside Agencies" section
2-3	Updated responsibility throughout the Procedure section (i.e., switched "Chief Compliance Officer" to "Compliance Department")

	<b>Policy + Procedure Title</b>	<b>Document Number</b>	CC.P+P.001.08
	Internal Reporting Obligations and Investigations Policy	<b>Revision Level</b>	8
	<b>Policy + Procedure Owner</b>	<b>Revision / Effective Date</b>	03/2024
	Chief Compliance Officer	<b>Policy + Procedure Approver</b>	Chief Executive Officer

**Purpose/Scope**

As part of Centria’s Compliance Program, every team member is required and has the affirmative duty to internally report any observed or potential violations of the law, regulations, or Centria’s Code of Conduct through the designated internal Compliance Program channels. As a team member of Centria you are expected and required as a condition of your employment to follow these reporting protocols. Centria has a policy that prohibits any retaliation against an individual who makes an internal report to the Compliance Program in good faith. Failure to internally report potential violations can lead to disciplinary action, including but not limited to, termination of employment.

**Responsibility**

All Centria team members and business associates.

**Policy**


The following are examples (not an exhaustive list) of situations that you would be required to internally report to the Compliance Program if you had specific knowledge or awareness of a potential violation:

- A team member billing for services when they did not provide them;
- A team member misrepresenting the services that were provided;
- Any suspected physical, verbal, or emotional abuse or exploitation of a client by a team member;
- Falsification of service or payroll documentation;
- Theft of company property or materials, including anything that is considered confidential information;
- Harassment or discrimination of a team member or client by another Centria team member;
- Inappropriate conduct in the workplace that violates Centria’s Code of Conduct;
- Recipient Right’s issue or violation (Michigan Medicaid clients);
- Notice of a government or outside agency investigation or inquiry;
- Threat of a lawsuit against Centria or one of its team members;
- Any event likely to cause significant reputational or financial harm to Centria;
- Any other violation of a legal, regulatory or contractual requirement by a team member while on duty.

It is imperative that you immediately make an internal report when required so that Centria can undertake a comprehensive internal review of the matter and take appropriate corrective action depending on the results of any investigation. This is a job requirement for **all Centria Team Members**. Team members should not attempt to handle any suspected compliance issues on their own, including conducting their own investigation surrounding the issue or discussing an allegation with anyone other than the Compliance Team. Centria will treat all internal reports to the Compliance Program confidentially to the extent reasonably possible.

**Outside Agencies**

Team members may exercise their rights to directly contact any regulatory authority, government agency, accrediting body, law enforcement, or other enforcement entity to report potential violations under applicable law(s). This policy is not intended or should not be construed to restrict, discourage, or interfere with communications or actions that are

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protected or required by state or federal laws or regulations. However, team members are required to report these matters through the internal escalation procedure as well.

When making a report to any outside agency, team members are prohibited from sharing client or employee records without expressed written permission. If a team member feels that confidential client or employee records must be provided as part of a report to an outside agency, an advance request should be submitted to Centria's Privacy Officer at [CorporateCompliance@centriahealthcare.com](mailto:CorporateCompliance@centriahealthcare.com) for necessary approval.

To comply with mandated reporting requirements, team members may:

- Provide the minimum necessary client or employee identifying information to accomplish the report;
- Summarize relevant factual information in a written personal statement or agency-required form;
- Verbally share their own personal observations.

When any information related to a Centria client is shared with an outside agency without the guardian's written consent, the team member who provided this information may be required to document the disclosure in the client's record. Team members should refer to Centria's [Accounting for Disclosures of Protected Health Information](#) policy to evaluate the need for such documentation.

Finally, team members should not respond to outside agency requests for information without guidance from the appropriate Centria leader or department. Team members should immediately route all external requests as follows:


- Investigations ([corporatecompliance@centriahealthcare.com](mailto:corporatecompliance@centriahealthcare.com))
- Audits ([audit@centriahealthcare.com](mailto:audit@centriahealthcare.com))
- Clinical Credentialing/Licensure Boards and Accrediting Bodies ([ethics@centriahealthcare.com](mailto:ethics@centriahealthcare.com))
- All other outside agency requests ([support@centriahealthcare.com](mailto:support@centriahealthcare.com))

**Procedure**

**1. Internal Report is initiated.**

There are several available options to make an internal report:

- Directly and confidentially email the Compliance Team:  
[corporatecompliance@centriahealthcare.com](mailto:corporatecompliance@centriahealthcare.com)
- Submit a report form through Centria's website:  
<https://www.centriahealthcare.com/submit-a-complaint-or-violation>
- Call the toll-free, third party Centria Compliance Hotline: **(866) 842-7126**  
You can choose to give your name or remain anonymous if you prefer.
- Send a written complaint via mail addressed as follows:  
Centria Health Care, LLC. – Attention: Compliance Department  
27777 Inkster Rd., Suite 100  
Farmington Hills, MI 48334

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**2. Report is reviewed/investigated.**

All potential compliance issues will be reviewed by the Compliance Department unless the issue specifically names and involves the Chief Compliance Officer. Issues that involve the Chief Compliance Officer will be handled by the Chief Executive Officer and/or outside counsel.

- 2.1.** A Compliance Officer gathers and reviews all relevant information. The Compliance Officer will speak with individuals who may have knowledge of the reported matter. Any information requested as part of the review must be submitted in a timely manner.
- 2.2.** During the review process, Centria team members are not to discuss any information under review with anyone other than the Compliance Department unless directed to do so by a Compliance team member.
- 2.3.** When conducting an internal investigation, the Compliance Officer may seek the assistance and guidance of experienced legal counsel.

**3. Review and investigation summary report (as applicable) are completed.**

Once the review is complete, the Compliance Officer will notify the necessary individuals of the outcome and take appropriate follow-up action. Due to confidentiality laws and regulations that protect certain types of information, the Compliance Department may not be at liberty to discuss details with individuals who made the report or were involved in the investigation of the report. However, the Compliance Department can communicate whether the issue is under investigation, open, or closed.