



Reports of Suspected Compliance Program Violations: Confidentiality

Subject: Responding to Compliance Issues

Policy Number: BPS RCI-001

PURPOSE

The purpose of BPS RCI-001 is to provide (1) a statement of Bluestone's (BPS) policy with respect to the confidentiality of reports of suspected non-compliance, and (2) procedures to ensure that Bluestone's practices are consistent with its stated policies.

SCOPE

This policy applies to all *covered persons of Bluestone Physician Services, P.A., Bluestone National, LLC, and Bluestone Physician Services Wisconsin, and its subsidiaries and affiliates, (collectively, Bluestone Physician Services (BPS)).

DEFINITION

*Covered persons means: (a) all owners who are natural persons, officers, board members, and employees of Provider; (b) all contractors who furnish patient care items or services or perform billing or coding functions on behalf of Provider; and (c) all physicians and other non-physician practitioners who are members of Provider's active medical staff.

POLICY

BPS Covered Persons are required to report any suspected noncompliance with applicable laws or regulations, the Bluestone Compliance Plan, Bluestone Code of Conduct, Policies and Procedures, other applicable requirements. BPS shall provide the necessary infrastructure to facilitate such reporting, including a Confidential Compliance Reporting Tool (pursuant to BPS CMO-002) that allows individuals to report suspected non-compliance anonymously and without fear of retaliation.

PROCEDURE

A. **Response to Report.** Where an individual has made a good faith report of an activity or practice that the individual believes violates or may violate applicable laws or regulations, the Compliance Plan, Bluestone Code of Conduct, Policies and Procedures, or other applicable requirements, the Bluestone Compliance Officer shall:



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1. Communicate appreciation to the individual for making the report, as appropriate;
2. Strive to keep the identity of the reporting individual confidential; and
3. Inform the reporting individual (if known) that there may come a point in time where his or her identity may become known or may have to be revealed (e.g., if government authorities become involved in the investigation).
4. Contact the individual prior to releasing his or her name.

B. Documentation. BPS shall document compliance with BPS **RCI-001** . Such documentation, which may include electronic documentation, shall be maintained in Bluestone's Compliance Program files consistent with its document retention policies.

ENFORCEMENT

All staff whose responsibilities are affected by this policy are expected to be familiar with the basic procedures and responsibilities created by this policy. Failure to comply with this policy will be subject to appropriate performance management pursuant to all applicable policies and procedures, up to and including termination.

Related Policies and Procedures

- [BPS Code of Conduct](#)
- [BPS CMO- 002](#) - Reporting Suspected Non-Compliance, Subject: Compliance Monitoring & Oversight
- [BPS RCI-001](#) - Responding to Compliance Issues, Subject: Responding to Compliance Issues
- [BPS RCI-003](#) - Investigation of Compliance Violation Reports, Subject: Responding to Compliance Issues
- [BPS HE-004](#) - Duty to Report Suspected Non-Compliance, Subject: Hiring, Employment, & Contracting



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RESOURCES

[1] 42 C.F.R. 425.300.

[2] The OIG provides detailed compliance program advice, including "best practices" at its website, www.oig.hhs.gov/compliance, including specific advice for separate types of entities. A review of compliance guidance posted here should regularly be undertaken to ensure a complete, up-to-date understanding of compliance requirements.

[3] 42 C.F.R. 425.314.

[4] Established under Section 3022 of the ACA, amending Title 18 of the Social Security Act by adding Section 1899, et seq.

[5] 76 Fed. Reg. 19528 (April 7, 2011), 76 Fed. Reg. 67802 (Nov. 2, 2011), 79 Fed. Reg. 72760 (Dec. 8, 2014), 80 Fed. Reg. 32692 (June 9, 2015), and 81 Fed. Reg. 37950 (June 6, 2016).

[6] Located at <http://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/sharedsavingsprogram/index.html?redirect=/sharedsavingsprogram/>.

Approval History

Date (MM/YYYY)	Stakeholders	Name/Title
10/2/24	Executive Compliance Committee	

Revision History

Date (MM/YYYY)	Revisions	Name/Title	Version
9/2024	DRAFT	Nanc MacLeslie	DRAFT
10/2/24	Approved	Exec. Compliance Comm.	1



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¹ Prepared at the direction, request, and in furtherance of the purposes of a review organization and any and all information and documentation prepared in furtherance of this policy is confidential and should not be shared outside of Bluestone Physician Services or its Affiliates. Protected under Wis. Stat. 146.38 and Minn. Stat. 145.61et seq. and FL Stat 766.101. The information contained herein is provided for informational purposes only and does not constitute legal, medical, or professional advice. Further, these policies and procedures are subject to change without prior notice, and Bluestone makes no representation to reliance on users of outdated information. Users should check back here for updates regularly.