

POLICY INFORMATION

Policy Title: Compliance Exit Interview Policy and Procedure

Departmental Owner: Chief Compliance, Audit, and Privacy Officer

Version Effective Date: 2/28/24

Last Reviewed: 2/28/24

SCOPE

This policy applies to the following individuals and/or groups:

All of the below categories

All Employees CT Employees NY Employees Remote Employees Contractors Volunteers Students/Interns Vendors

This policy applies to all above listed Nuvance Health workforce members including but not limited to the following locations:

All of the below entities

Nuvance Health Systems

Danbury Hospital (including New Milford Hospital Campus)

Northern Dutchess Hospital

Norwalk Hospital

Putnam Hospital

Sharon Hospital

Vassar Brothers Medical Center

Health Quest Systems, Inc. "(HQSI)"

Health Quest Home Care, Inc

Hudson Valley Cardiovascular Practice, P.C. (aka The Heart Center) ("HVCP")

Other HQSI-affiliated Entities Not Listed

Western Connecticut Home Care, Inc ("WCHN")

Western Connecticut Health Network Physician Hospital Organization ACO, Inc.

Western Connecticut Home Care, Inc

Other WCHN-affiliated Entities Not Listed

Nuvance Health Medical Practices (NHMP PC, NHMP CT, ENYMS & HVCP)

POLICY STATEMENT/PURPOSE

To establish and describe the Compliance Exit Questionnaire ("Questionnaire") process for involuntary terminations.

POLICY

Nuvance Health and its affiliates' ("Nuvance") is committed to maintaining a compliant workplace and resolving any issues relating to non-compliant activities. As part of those efforts, employees who are leaving the company will be given an opportunity to report compliance related concerns during the Nuvance Compliance Exit Interview Process.

PROCEDURE

1. On a monthly basis, following notice of a separation of employment from Human Resources, the Compliance Office will make every effort to have the former employee complete a Questionnaire.
2. The former employee will be mailed a letter containing a link to the online questionnaire. The letter will also provide the former employee with additional avenues to contact the Compliance Office directly, with one of those options allowing the recipient to remain anonymous (see attachment A).
3. In the event that a compliance issue is raised through the exit interview process, the Compliance Office will address the issue in a manner that is consistent with policies and procedures. Non-compliance related matters will be referred to the appropriate department.
4. The exit interview process for voluntary terminations is handled by the Human Resource Department. Compliance matters are forwarded to the Compliance Office for handling.

Original Effective Date: LHQ= 6/15/17

Revision Dates: 2/28/24

Supersedes: HQ 5.1.14 Compliance Exit Interview Policy;

HQ 5.1.14 Compliance Exit Interview Procedure

REFERENCES

Nuvance Health Codes of Conduct
Compliance Disclosure Program Policy

APPROVAL.

DocuSigned by:

Jared B Gaynor
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Signature

2/28/2024

Date