

## Compliance Guidance: Surgery Partners Action Line Version 3 10/06/2022

## What you should know:

The Surgery Partners Action Line is a compliance hotline and is a way for patients, employees, providers, contractors, or other concerned parties to bring up topics of concern or report suspected criminal activity and possible illegal or unethical conduct occurring within the organization. You can report anonymously, and no attempt will be made to identify any person reporting who requests anonymity, to the extent allowed by law.

To report a concern, please contact the Surgery Partners Action Line:

**Phone:** 1-877-363-3069

Web Reporting: http://SPActionline.ethicspoint.com

**Mobile Reporting:** 



When should I report things to the Action Line?	<ul> <li>A good rule of thumb is to report those concerns that you believe:</li> <li>may violate a law</li> <li>may violate a policy or procedure at your facility</li> <li>something about the facts and/or circumstances just feels wrong</li> <li>would cause damage to the reputation of your facility if this was reported to the public through the news media or social media</li> <li>You would be embarrassed for people to know that you worked at this facility if this was public knowledge</li> </ul>
Am I required to report anytime I have a concern that one of the bullet points above covers?	Yes.  Everyone has a responsibility, in fact a duty, to report concerns related to any potential violation of federal or state law.
Do I have to give my name when I call in a concern?	No.  You can remain anonymous if wish when reporting concerns to the action line.  That said, often we have follow-up questions for our reporters. Please be sure to either call back in or log-on to check and see if we have left questions for you.



How much detail do I	As much as possible.
need to give?	
	The more information you can share with us, the more thoroughly we can investigate your concern.
Am I talking to a Surgery	No.
Partners employee when I call the Action Line?	We intentionally contract this service to a third party, Navex Global, to host our Action Line reporting. This is done to give you confidence that if you choose to remain anonymous, no one at Surgery Partners will be able to identify you from the call.
Are calls to the Action	No.
Line recorded?	Navex Global only sends over a typed report of the concern shared via phone or by web reporting. No recording is ever made.
Can I just report my	Yes.
concerns to my supervisor?	We encourage you to report issues and concerns to your supervisor and/or higher management in your area.
	If this is not the avenue you desire, or if the issues are not resolved to your satisfaction, you can escalate to the Surgery Partners Office of Compliance via:  • Chief Compliance Officer Direct Line: 615-234-5967  • Direct e-mail: compliance@surgerypartners.com  • Confidential Surgery Partners Action Line:  • 1-877-363-3069 (24/7 availability)  • <a href="https://surgerypartners.ethicspoint.com">https://surgerypartners.ethicspoint.com</a>
Will I get in trouble for	No.
reporting a concern to the Action Line?	Surgery Partners has a "No Retaliation" policy and will not retaliate against, engage in retribution, harass or condone such actions in any manner toward a person for making a report in good faith.
	Any individual who is involved in any act of retaliation, retribution or any form of harassment — either committing the act or condoning it — against a person who reports a compliance concern will be subject to disciplinary action up to, and including, termination. However, if the reporter knows, or reasonably should know, the report is not true but makes the report anyway in an attempt to mislead or misdirect attention or cause harm, those reports are considered to be made in bad faith. Reporting of this type can be subject to disciplinary action.



What does "good faith" mean?	Good faith reporting means that the person reporting has a reasonable belief that the report is true and tends to show that an improper action either has been, is being, or is about to occur.
Additional Questions?	Please contact the Surgery Partners Office of Compliance  Office of Compliance email:     compliance@surgerypartners.com  Surgery Partners Action Line:     Phone: 1-877-363-3069     Web Reporting: <a href="https://surgerypartners.ethicspoint.com">https://surgerypartners.ethicspoint.com</a> Mobile Reporting: