

Document Type:¹

☒ Policy & Procedure ☐ Process Guideline
☐ Plan ☐ System Description

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Document Scope: (applies to Policy & Procedure only)

- ☐ The requirements herein apply only to the GCBH BH-ASO Central Office and its functions.
- ☒ The requirements herein apply, verbatim, to GCBH BH-ASO and its network providers².
- ☐ The requirements herein apply to both GCBH BH-ASO and its network providers². Additionally, network providers must have internal documents outlining their processes for implementing the requirements, insofar as they relate to actions for which network providers are responsible.

PURPOSE: Greater Columbia Behavioral Health Administrative Services Organization (GCBH BH-ASO) believes all staff, Executive and Advisory Board members, vendors, delegates, and subcontractors should express their problems, concerns and opinions on any issue and feel that their views are important. This policy is designed to encourage staff, vendors, delegates, and subcontractors to communicate problems, concerns, and opinions without fear of retaliation or retribution.

DEFINITIONS

- I. None

POLICY

- A. All staff, Executive and Advisory Board members, vendors, delegates, and subcontractors are responsible for promptly reporting actual or potential wrongdoing, including an actual or potential violation of law, regulation, policy, or procedure.
- B. The GCBH BH-ASO Compliance Officer will maintain an “open door policy” to allow any individual the opportunity to report problems and concerns.
- C. The GCBH BH-ASO Compliance Officer will act upon the concern promptly and in the appropriate manner.
- D. The GCBH BH-ASO Compliance Hotline, 1-800-975-1405 or GCBH’s main office number 509-737-2475, is designed to permit any individual to call, anonymously or in confidence, to report problems and concerns or to seek clarification of compliance-related issues.
- E. Any individuals who report concerns in good faith will not be subjected to retaliation, retribution, or harassment.
- F. No staff, Executive or Advisory Board members, vendors, delegates, or subcontractors are permitted to engage in retaliation, retribution or any form of harassment against another individual for reporting compliance-related concerns. Any retribution, retaliation or harassment will be met with disciplinary action.
- G. No individual can exempt themselves from the consequences of wrongdoing by self-reporting, although self-reporting may be taken into account in determining the appropriate course of action.

PROCEDURE

1. Knowledge of actual or potential wrongdoing, misconduct, or violations of the Program Integrity Plan must be reported immediately to a supervisor, the GCBH BH-ASO Compliance Officer, or the GCBH BH-ASO Compliance Hotline.
2. All GCBH BH-ASO managers must maintain an open-door policy and take aggressive measures to assure their staff that the system truly encourages the reporting of problems and that there will be no retaliation, retribution, or harassment for doing so.
3. GCBH BH-ASO must ensure that all staff, Executive or Advisory Board members, vendors, delegates, and subcontractors are provided with a copy of this policy.
4. If a GCBH BH-ASO staff member feels uncomfortable with reporting concerns to their supervisor, the staff member should report concerns directly to the GCBH BH-ASO Compliance Officer or the GCBH BH-ASO Compliance Hotline.
5. Confidentiality regarding concerns and problems will be maintained at all times, insofar as legal and practical, informing only those personnel who have a need to know.
6. Any issue identified as pertaining to human resources will be forwarded to the GCBH BH-ASO Human Resource Department.

APPROVAL



Karen Richardson or Sindi Saunders, Co-Directors



Date