Baptist Health South Florida

POLICY NO.: BHSF-823

☑ Administrative
☐ Departmental

SUBMITTED BY:

Beth Gillis
Title: Corporate Assistant Vice President, Compliance

APPROVED BY:

Wendy Kemp
Title: Corporate Assistant Vice President, Audit

Responsible Department: Audit and Compliance

APPROVED BY:

Karen Brady
Title: Corporate Vice President and Chief Compliance Officer

Creation Date: 12/05
Review Date: 2/05/07
Revision Date: 11/28/11

POLICY TITLE:
Compliance Hotline

SUMMARY & PURPOSE:
To describe the purpose of the Compliance Hotline and the procedures for handling reports received via the Compliance Hotline.

POLICY:
The Compliance Hotline offers an alternative means of reporting suspected violations of the Code of Ethics in those situations where the individual does not feel comfortable reporting the issue directly to their supervisor, a member of management or one of the designated contacts listed in the Code of Ethics. It is available to anyone wishing to report a suspected violation of the Code of Ethics. Employees, medical staff members, and vendors are encouraged to utilize the Compliance Hotline as a confidential mechanism for reporting suspected violations.

SCOPE/APPLICABILITY:
Any individual who wishes to report a suspected violation of the Code of Ethics.

PROCEDURES TO ENSURE COMPLIANCE:
Baptist Health South Florida encourages employees and others providing services or doing business with the organization to report suspected violations of our Code to their supervisor, management, Audit and Compliance, Legal Department, Human Resources or the Compliance Hotline.

In those situations where the individual does not feel comfortable reporting the concern directly, the concern may be reported via the Compliance Hotline.

A suitable vendor is contracted with to provide operators to answer the Compliance Hotline. The Compliance Hotline is answered 24 hours a day, seven days a week by a live operator. An online option for reporting concerns is also available and is subject to the same protections as the telephone option.

Anyone making a report to the Compliance Hotline may make the report anonymously. Phone numbers and computer addresses are not traced or collected by the vendor, unless the caller/writer chooses to reveal that information.

To the extent possible, the identity of callers/writers to the hotline, if known, is protected.

If the report is made via the telephone, the contents of the call to the hotline will be transcribed by the vendor. Language line operators will be engaged on an as needed basis.

Reports made to the Compliance Hotline are assigned a report number and a follow-up date, which is communicated to the individual making the report. The follow-up date is the date the individual may contact the hotline to receive a status report. Should something arise before the scheduled follow-up date, an unscheduled follow-up may be initiated at any time.

Reports are communicated to the Audit and Compliance Department. All calls received via the hotline are logged. The content of the call will be analyzed and a determination will be made as to the appropriate course of action. If deemed necessary, an investigation will be initiated by Audit and Compliance. In some instances, the issue may be referred to a more appropriate member of management for resolution.

When a call is referred to a member of management, the initial communication will contain the following statement:

> Hotline Policy:
> When a caller contacts the hotline, they are assigned a call number and a follow-up date. We are required to send a response to the hotline service prior to the follow-up date. If the caller follows-up on or after the assigned date, the hotline service will read the response we have submitted to the caller. If the call is anonymous, we can send a response to the caller asking the caller to contact a particular person or to provide further details, if needed.
>
> We should never attempt to identify or contact the caller unless the caller provides contact information. In accordance with federal and state laws, we have a non-retaliation policy. Employees who contact the hotline in "good faith" are protected to the maximum extent possible from retaliation or disciplinary action for placing a hotline call.
>
> Please advise as to what action is taken regarding this report since we are required to document all follow-up on hotline calls. The hotline is intended to be a safe and confidential way to report concerns. The existence of an effective, confidential hotline program is one of the standards for effective compliance programs.

Management will advise Audit and Compliance of actions taken to investigate and resolve the concern. When applicable, Audit and Compliance policies regarding investigations and discipline will be followed.

Audit and Compliance will maintain a log of actions taken and the status of the issue. On a periodic basis the log will be analyzed to identify trends that may require changes in operations or policy to remediate.

Audit and Compliance will communicate a follow-up message to be relayed to the caller, should the caller place a follow-up call.

All calls received via the hotline will be reported to the Audit and Compliance Committee as part of the written activity report.

Information regarding the availability of the Compliance Hotline will be included in the Code of Ethics, all compliance training programs and on the department's intranet website. See Policy BHSF 826 Communicating Corporate Compliance Program Standards.

On a periodic basis, Audit and Compliance will place test calls to the Compliance Hotline to assess performance of the contracted vendor.

SUPPORTING/REFERENCE DOCUMENTATION:

- United States Federal Sentencing Guidelines
- Office of the Inspector General Compliance Program Guidance for Hospitals
- Office of the Inspector General Supplemental Compliance Program Guidance for Hospitals

RELATED POLICIES, PROCEDURES, AND ASSOCIATED FORMS:

- BHSF Departmental: Policy 801 Department Responsibilities and Charter Policy – Audit and Compliance
- BHSF Departmental: Policy 819 Code of Ethics Policy – Audit and Compliance
- BHSF Administrative: Policy 822 Non-Retaliation for Reporting of Potential or Actual Violations of the Code of Ethics Policy – Audit and Compliance
- BHSF Departmental: Policy 826 Communicating Corporate Compliance Program Standards Policy – Audit and Compliance

ENFORCEMENT & SANCTIONS:

Enforcement of this policy is the responsibility of the Audit and Compliance Department.