

Our Lady of Lourdes Health Care Services, Inc. and Affiliates

POLICY NUMBER: AS0007CCP

NURSING CODE: _____

PAGE NUMBER: 1 of 3

TITLE: Corporate Compliance Hotline Reporting

ACCOUNTABILITY:

President and Chief Executive Officer

OBJECTIVES:

RELATION TO MISSION:

Our Lady of Lourdes, a Catholic Health System – a member of Catholic Health East – dedicated to its Franciscan Tradition of serving all, will demonstrate the value of **Stewardship** by establishing a system to provide associates a means to report suspected violations of the Code of Ethics, Code of Conduct, policies and procedures or Federal and State laws and regulations.

RELATION TO OPERATION:

The Corporate Compliance Hotline was established to help associates in reporting suspected violations of the Code of Ethics, Code of Conduct, policies and procedures or Federal and State laws and regulations.

POLICY:

- 1) Trustees, officers, leadership associates, managers, supervisors, associates, medical staff, house staff, contractors, volunteers, students and others have an ethical responsibility to report any violations or possible violations of Our Lady of Lourdes Health Care Services, Inc. and Affiliates (OLLHCS, Inc.'s), Code of Ethics, Code of Conduct, policies and procedures or Federal and State laws and regulations. To address this responsibility, OLLHCS, Inc. uses a compliance telephone hotline to report suspected violations or questionable conduct.
 - a) The hotline telephone number is 877-215-5697 and is available twenty-four Hours a Day seven days a week.

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- b) The telephone number is included in physician agreements, the employee handbook and displays on bulletin boards.
 - c) The Director of Compliance & Privacy Officer responds to hotline calls. When the Director of Compliance & Privacy Officer is not available, an individual is designated by the Director and approved by the Compliance Committee to handle hotline calls.
 - d) Calls may be placed anonymously.
 - e) Callers are not subject to disciplinary action for factual statements regarding instances on non-compliance with federal, state and local laws including fraud, waste and abuse.
 - f) Information provided to the hotline is treated confidentially and as privileged to the extent permitted by applicable law.
 - g) Callers are informed that if the incident requires government authority involvement, the caller may have to reveal his/her identity.
 - h) Intentional false accusations are prohibited. Offenders may be subject to termination.
- 2) Associate calls leading to the discovery of non-compliant activities do not protect the associate against any wrongdoing committed by the associate. However, the disciplinary action taken is not increased against the associate.
- 3) The Department of Health & Human Services – Office of Inspector General Hotline telephone number, 1-800-HHS-TIPS (447-8477) is also posted in prominent areas.
- 4) The Director of Compliance and Privacy Officer summarizes reports on hotline activities and provides periodic updates on hotline activity to the Corporate Compliance Committee.

APPROVED BY: _____
Alexander J. Hatala, President and Chief Executive Officer

ORIGINAL & REVISION DATE(s): 03/22/00, 12/19/01,
08/25/04

NEW EFFECTIVE DATE: 08/31/07

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REQUIRES REAUTHORIZATION IN: 08/31/10

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