

Maricopa Integrated Health System: Administrative Policy & Procedure

Effective Date: 02/05

Reviewed Dates:

Revision Dates: 08/05, 2/08

Policy #: 01106 S

Policy Title: Compliance: Compliance Hotline

Scope: **District Governance(G)**

System-Wide(S)

Multi-divisions(MD)_____

Division(D)_____

Multi-departments(MT)_____

Department(T)_____

Signature: (Original copy signed and held in MIHS Administrative Policy and Procedure Current Publications)

[John Middleton – Chief Compliance Officer, MIHS]

Purpose:

Maricopa Integrated Health System (MIHS) is committed to the timely identification and resolution of all issues that may adversely affect employees, patients or the organization. Therefore, MIHS has established communication channels to report compliance-related problems and concerns including a telephone hotline **(1-866-333-MIHS)**. Employees are encouraged to report problems or concerns either anonymously or in confidence via the hotline when they deem appropriate. The hotline establishes an avenue for employees or interested parties to report suspected criminal activity, illegal or unethical conduct occurring within the organization in the event other resolution channels are ineffective or the caller wishes to remain anonymous.

Policy:

1. MIHS will establish and maintain an external answering service that employees may use to report problems and concerns either anonymously or in confidence.
2. MIHS will strictly adhere to Policy # 01105 S—Non-retaliation, and will not tolerate any form of retaliation or retribution taken against employees who report problems or concerns via the hotline, in good faith.

Procedure:

1. All employees who handle hotline reports are expected to act with utmost discretion and integrity in assuring that information received is acted upon in a reasonable and proper manner. Everyone who receives or is assigned responsibilities for hotline reports shall agree to the terms as set forth in the Acknowledgement of Confidentiality.
2. Hotline operations (call receipt and reporting will be conducted by an outside agency, specializing in handling employee hotlines in the health care industry. The Chief Compliance Officer (CCO) is responsible for ensuring that the outside agency fulfills its contractual obligations and maintains an appropriate level of service.

3. Calls will be documented on a confidential hotline intake form and forwarded to the CCO via email.
4. Callers will be provided an identification number to protect their identity.
5. All callers to the hotline will hear the same pre-recorded message explaining their rights, any limitations, the non-retaliation policy and other pertinent information.
6. No attempt will be made to identify a caller who requests anonymity.
7. Whenever callers disclose their identity, it will be held in confidence to the fullest extent practical or allowed by law.
8. Once a report is received, the CCO or his designee will conduct appropriate follow-up and investigation. The hotline investigation will involve other departments, as appropriate, for advice or further investigation. In the event that the CCO is not, in good faith, satisfied that a matter brought before the aforesaid departments was appropriately addressed and resolved, the CCO will be responsible for and is authorized to take the matter to other persons in positions of authority.
9. The CCO will report periodically to the Compliance Committee and the Board of Directors regarding Compliance Hotline activity. This report will include the total number of calls received and acted upon and general results from the hotline operation. In addition, the report will include any recommendations for system-wide improvements or corrective actions arising from the results of the operation and related investigations.

References: Policy # 01105 S - Non-retaliation

Keywords: Chief Compliance Officer, Compliance Program, confidential disclosure, Employee Hotline, Executive Compliance Committee, Hotline, non-retaliation