



TITLE: COMPLIANCE – HELPLINE OPERATION

I. PURPOSE:

To establish a procedure for the confidential and anonymous reporting of compliance issues and concerns through the establishment of a Western Connecticut Health Network (“WCHN”) Compliance and Ethics Helpline (“Helpline”).

II. POLICY:

1. At WCHN we hold the highest level of value and respect for our patients, workforce, and affiliated business personnel. Accordingly, WCHN is committed to delivering patient care services and conducting its business initiatives in an ethical and legally compliant manner with integrity being at the cornerstone of our mission and strategic goals. All WCHN workforce members, business affiliates, and agents (collectively “Covered Individuals”) are expected to assist WCHN in its compliance efforts by utilizing the following toll free confidential and anonymous Helpline to promptly report compliance issues or concerns that they become aware of: **1-844-395-9331**.
2. All Covered Individuals are required to report conduct involving any of the following prohibited activities:
 - A. Issues or concerns regarding fraud, waste and abuse, conflicts of interests, and standards of conduct including, without limitation, the following:
 - Improper coding, billing or accounting;
 - Improper patient referrals;
 - Theft or misappropriation of WCHN assets or government funds;
 - Acceptance or offering of inappropriate gifts or gratuities;
 - Inappropriate business arrangements;
 - Actual or potential conflicts of interest;

- Actual or suspected violations of Federal or State law or WCHN's internal policies and procedures including WCHN's Code of Conduct and Business Ethics;
 - Failure to comply with Federal healthcare program conditions of participation or private payor requirements; and
 - Failure to refund overpayments.
- B. Issues or concerns regarding privacy and security of patient, employee, and other confidential information including, without limitation, the following:
- Inappropriate access, use, disclosure or disposition of confidential patient, workforce member or business information; and
 - Violations of WCHN HIPAA, information technology or record management policies and procedures.
- C. Issues or concerns regarding medical necessity, quality of care, and patient rights including, without limitation, the following:
- Patient harassment, discrimination, abuse or other patient rights violations;
 - Preventable adverse patient events;
 - Human subject research misconduct; and
 - Providing substandard, unsafe or medically unnecessary patient care.
- D. Issues or concerns regarding environmental and workplace safety and the protection of human resources including, without limitation, the following:
- Workforce member harassment (e.g., sexual harassment);
 - Workplace incivility or conduct that amounts to a hostile work environment;
 - Environmental hazards and other safety concerns;
 - Conduct that endangers the safety of the WCHN workforce;

- The improper handling and/or disposal of medical waste, sharps, pharmaceuticals or radioactive or other toxic substances; and
- Workforce member discrimination.

PROCEDURE:

1. The Corporate Compliance Office shall establish and maintain a Compliance Helpline that is: (i) administered through an independent company; (ii) available 24 hours a day, seven days a week, and 365 days a year; and (iii) allows for the anonymous reporting of compliance issues or concerns by Covered Individuals, patients, and other WCHN stakeholders.
2. Callers will be advised that information will remain confidential, to the extent permissible under applicable Federal and State law and WCHN's internal policies and procedures.
3. Callers are encouraged to leave their name and contact telephone number so that the Corporate Compliance Office can conduct a complete and thorough investigation. Notwithstanding, callers shall be advised that they may choose to remain anonymous.
4. The Corporate Compliance Office will listen to messages left on the Helpline and will record the following information:
 - Name of the caller (unless anonymous);
 - Contact telephone number of the caller (unless anonymous);
 - Date of the call;
 - Name of the facility and department where the alleged compliance violation has occurred; and
 - Any relevant information concerning the allegation.
5. If additional information is required, the Corporate Compliance Office will contact the caller, if identified, to obtain the additional information. This process will remain as discreet as possible.
6. If the call is anonymous, the Corporate Compliance Office will evaluate the call to determine if the case can be investigated without obtaining additional information. If it is determined that an anonymous call cannot be investigated without additional information, the matter shall be closed. The Enterprise Risk and Compliance Committee ("ERCC") shall be informed of these closed matters.

7. If the call is a general inquiry (e.g., the caller is wondering when another compliance training session will be offered) the information may be referred to the appropriate member of the ERCC or Administrative Team (e.g., Human Resources) for follow-up.

ORIGINATOR	CORPORATE COMPLIANCE
DATE OF INCEPTION	3/21/2001
REVISION DATE	6/02, 9/07, 6/09, 12/11, 2/15, 9/18
LATEST REVIEW DATE	9/28/2018
APPROVED BY	EXECUTIVE LEADER