

Ethics and Compliance Hotline Questions and Answers

1.	What is EthicsPoint?	EthicsPoint is a comprehensive, confidential, and anonymous internet and telephone-based reporting tool that assists management and employees in working together to address compliance or regulatory concerns in the workplace.
2.	May I report using either the internet or the telephone?	<p>Yes, you may. By giving you choices, BJC and EthicsPoint help ensure that employees can file a report anonymously and, in the manner, most comfortable or convenient to them.</p> <p>To report via the telephone, you may continue to call the BJC Ethics and Compliance Hotline number at 1-800-525-BJC1.</p> <p>To make a report via the internet click on the appropriate link from the BJC Compliance Web Page or BJC Intranet home page, or go directly to www.bjc.ethicspoint.com, click on “File a New Report.”</p> <p>The reporting hotline is available 24 hours a day, 365 days a year. You may make a report using any computer that has internet access.</p>
3.	Why do we need a system like EthicsPoint?	Open channels of communication help create a positive and ethical work environment. The use of such anonymous reporting systems has been recommended for all healthcare organizations by the Office of Inspector General of the Department of Health and Human Services. By outsourcing our Ethics and Compliance Hotline to EthicsPoint, BJC can ensure its employees of coverage 24 hours a day, 365 days a year and provide a secure, anonymous manner for employees to follow-up on their reported concern if they so desire. It is important that BJC maintains an environment in which employees can identify instances of billing or financial misconduct and other serious regulatory or ethical concerns.
4.	Why should I report what I know? What is in it for me?	We all have the right to work in a positive environment and with that right, comes the responsibility to act in an ethical manner and to let the appropriate people know if someone is not acting appropriately. In addition, as recipients of governmental funds, we have a responsibility to ensure these funds are appropriately received and used in accordance with the legal and ethical obligations. Reporting can alert management to potential misconduct, so that it can be addressed and corrected, minimizing the potential negative effects on BJC Health System.
5.	What type of situations should I report?	The BJC Ethics and Compliance Hotline is designed to receive reports regarding issues or practices that employees believe in good faith may constitute a violation of the law, a regulation, or BJC’s policies. For instance, employees may use EthicsPoint to report ethical issues related to financial matters and internal controls including items such as inappropriate billing or coding, falsifying documents, improper handling of gifts, improper accounting and workplace fraud or theft. Employees may also report policy violations such as those related to HIPAA Privacy incidents or Identity Theft – “Red Flag” Rules. However, employees should continue to use safety event system for reporting patient and visitor safety related concerns.

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6.	If I see a violation, shouldn't I just report it to my manager and let them deal with it?	You are always encouraged to report suspected violations or questionable ethical conduct to your manager or other BJC officials using BJC's Four Step Communication Program. However, the EthicsPoint reporting process is an additional tool that can help if you have a concern, especially when you may not feel comfortable with the existing methods. Reports filed through EthicsPoint can be filed anonymously, and all report information is secure and held in the strictest confidence.
7.	I am not sure what I have observed or heard is a violation BJC policy, or involves unethical conduct, but it just does not look right to me. What should I do?	Speak to your manager and follow the BJC Four-Step Communication Program or file a report through EthicsPoint. EthicsPoint can help prepare your report so it can be properly understood. We would rather you report a situation internally or through EthicsPoint that turns out to be harmless than let possible unethical behavior go unchecked.
8.	I am aware of some individuals involved with unethical conduct, but it does not affect me. Why should I bother reporting it?	Misconduct has implications for the entire organization and consequently all employees. BJC is committed to enforcing applicable legal requirements, as well as its own policies and procedures. All unethical conduct, at any level, ultimately hurts everyone. If you know of any incidents of violations of law or policies, or other financial misconduct, consider it your duty to yourself and your coworkers to report it.
9.	Where do these reports go? Who can access them?	Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to BJC's Corporate Compliance Department or Human Resource Department as applicable, where trained professionals will evaluate the report and facts surrounding the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.
10.	How am I protected if another person uses this tool to falsely accuse me of unethical behavior or retaliates against me?	<p>Employees who file a report are expected to use good judgment in the use of this system. EthicsPoint has a direct follow-up feature that provides the ability to qualify reports that may appear to be unfounded. All inquiries and concerns submitted through EthicsPoint will be given careful attention with the objective of ascertaining the facts in each case. Reports of misconduct are considered allegations only and require proper and thorough investigations. However, employees who intentionally and maliciously use the hotline to make false allegations will be subject to disciplinary action.</p> <p>Retaliation against an employee who has used the BJC Ethics and Compliance Hotline is strictly prohibited. After making a report, if an employee perceives that he or she is being retaliated against, the employee should contact the Corporate Compliance Office directly. Accusations of retaliation will be taken very seriously, and agitators will face disciplinary actions.</p>