

BJC HealthCare Ethics and Compliance Hotline

Resolving a Compliance Issue

Compliance Documents:	The answers to many questions can be found in the various BJC and member-specific documents that describe the compliance policies and procedures.
Four-Step Communication Program:	<p>If employees have compliance questions or concerns, they cannot resolve by reviewing the various BJC or member-specific compliance documents, they should discuss the issue with their supervisor, manager, or another higher-level supervisory employee. Employees should seek to resolve the compliance problem promptly, constructively and at the lowest level possible by following these four steps:</p> <ol style="list-style-type: none">1. Discuss the issue with a supervisor. An employee's immediate supervisor know the employee and the issues in their workplace better than anyone else. Employees should give their supervisor a chance to solve the problem. Supervisors have access to a variety of BJC resources to address a specific problem.2. Speak to the department manager. If an employee and their supervisor cannot find an answer or if the employee does not feel that their concern is receiving proper attention, they can request a meeting with the department manager to discuss the matter further.3. Speak to a Compliance Liaison and/or senior manager. If the department manager is unable to resolve the matter satisfactorily, the employee should contact a Compliance Liaison or bring the matter directly to a more senior manager. To identify the appropriate Compliance Liaison, employees should call the BJC Corporate Compliance Department or the BJC Legal Services Department.4. Bring the matter to the attention of a BJC representative. Matters that are not resolved at the member hospital's or service organization's level may be brought to the attention of the BJC HealthCare Human Resources Department, the BJC Corporate Compliance Department, the BJC Audit Services Department, or the BJC Legal Services Department.

Reporting a Compliance Issue

Each employee is obligated to report any issue or practice that he or she believes in good faith may constitute a violation of the law or BJC compliance policies. People who are found to have engaged in unlawful conduct or conduct in violation of BJC's policies, or who have failed to detect, report and/or correct any offense, are subject to corrective action, up to and including termination of employment.

To report a compliance issue, follow the "Four-Step Communication Program" described above. If an employee feels uncomfortable reporting a compliance issue to his or her supervisor or any other BJC or organization-specific manager, he or she may make an on-line report or call the BJC Ethics and Compliance Hotline.

The Ethics and Compliance Hotline:	<p>Employees may call the Ethics and Compliance Hotline at 1-800-525-BJC1 (800-525-2521). Calls to the Hotline will not be traced and will be treated confidentially. Employees may remain anonymous if they choose. No caller will be subject to retaliation for bringing forth a good faith concern. Anyone who attempts to retaliate against an employee who has in good faith made a call to the Hotline will be subject to corrective action, up to and including termination of employment.</p> <p>The Hotline and on-line reporting are intended to supplement existing internal communication channels. They are not intended to replace the local management team, or the "Four-Step Communication Program" outlined above. These methods are available when employees feel they have exhausted normal channels or are uncomfortable about bringing an issue to their supervisor or manager.</p>
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