



About Broward Health's Disclosure Program and EthicsPoint

What is EthicsPoint?

EthicsPoint is the third-party vendor utilized by Broward Health for the Disclosure Program. It provides a mechanism for Broward Health workforce members, patients, and patients' families to report Compliance Issues and Ethics Issues, including suspected and actual violations of Broward Health's Corporate Compliance and Ethics Requirements or of Applicable Federal and State Requirements. The Disclosure Program includes a 24-hour toll-free hotline available to Workforce Members, patients, and their families through which Compliance Issues or Ethics Issues may be reported.

Why do we need the Disclosure Program?

It is Broward Health's policy that all Broward Health Workforce Members are required to promptly report upon discovery all suspected and actual violations of Broward Health's Corporate Compliance and Ethics Requirements or of Applicable Federal and State Requirements; that such reports are promptly and thoroughly investigated; and that appropriate corrective action is implemented. The Disclosure Program is anonymous and, to the extent possible, confidential, and prohibits retaliation against any individual or entity that makes a report through the Disclosure Program.

General Reporting Questions

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report via either the toll-free hotline by calling 1-888-511-1370 or the Internet.

What type of situations should I report?

Any suspected, known/observed or potential violation of Broward Health's Code of Conduct, Broward Health's policies or procedures or laws or regulations related to federally funded health care programs must be reported. This includes any issues associated with Broward Health's Code of Conduct, the Anti-kickback Statute and Stark Law. Examples include:

- Billing, Coding, Payment, and Documentation
- Physician and/or Referral Source
- Quality of Care
- HIPAA Privacy and Security
- Medical Necessity
- Violations of Policies and Procedure
- Regulatory Correspondence/Visit
- Patient Rights



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If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

Yes. There are several ways that you may report issues. Broward Health Workforce Members can make reports via any of the following mechanisms:

- Immediate supervisor and department director
- Chief Compliance Officer
- Corporate Compliance Department Staff
- Broward Health's Anonymous Toll-free Hotline
- Compliance@browardhealth.org

Why should I report what I know?

It is Broward Health's policy that all Broward Health Workforce Members are required to promptly report upon discovery all suspected and actual violations of Broward Health's Corporate Compliance and Ethics Requirements or of Applicable Federal and State Requirements

Where do these reports go? Who can access them?

The Corporate Compliance Department is responsible for maintaining the Disclosure Program. All reports entered by EthicsPoint representatives directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals in the Corporate Compliance Department. For additional information regarding assessment, investigation and resolution of reported issues, please refer to Broward Health's Disclosure Program policy located on the [Intranet](#).

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every web-site that my PC connects with, and won't this log identify me as a report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your Personal Computer (PC) to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity. If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports generated during business hours.

Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.



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Is the telephone toll-free hotline confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

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I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named. EthicsPoint reports are provided only to the Corporate Compliance Department of Broward Health. If your report involves a member of the Corporate Compliance Department, EthicsPoint will not provide the report to the Corporate Compliance. An alternate reporting structure will be followed to ensure that the implicated party is not notified or granted access to the report.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions or to follow-up

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report.



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Can I still file a report if I don't have access to the Internet?

You can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline 1-888-511-1370 which is available 24 hours a day, 7 days a week, 365 days a year.