## ValuesLine Reporter Guide

#### Tips for Using the ValuesLine to Report Concerns or Questions

What is the ValuesLine?

The Denver Health (DH) ValuesLine utilizes EthicsPoint – a comprehensive and confidential reporting tool created by NAVEX Global, Inc. – to help DH leaders and team members work together to address fraud, abuse, and other noncompliance with laws, the DH Code of Conduct, or DH policies and procedures. The term ValuesLine refers to the Denver Health hotline reporting program, including the procedures we use to address reported allegations and concerns. EthicsPoint refers to the NAVEX Global, Inc. system we subscribe to and use to manage the DH hotline program.

How do I submit a report?

You may submit a report using an EthicsPoint <u>online intake form</u> or by calling 1-800-273-8452. The hotline phone number is a good option to use if you do not have access to the internet. If you choose to report via telephone, your call is received by a third-party (not a Denver Health employee) to protect your confidentiality. Whether using the online intake form or making a phone call, you have the option to remain anonymous.

What types of situations should I report through the ValuesLine?

The ValuesLine program is designed for employees to report known or suspected violations of the Denver Health Code of Conduct or any other ethics or compliance question or concern you may have.

Should I use the ValuesLine instead of reporting a concern directly to my supervisor or others?

The ValuesLine program is not intended to replace direct communications to your supervisor, other Denver Health Leaders, Security, Enterprise Compliance Services, or Human Resources. We encourage you to make reports in the ValuesLine when you have already communicated concerns to your supervisors or others, or when you are concerned that doing so may result in some form of retaliation against you.

Why should I report a concern if I am afraid of negative outcomes or consequences?

As stated in the Denver Health Code of Conduct, you are expected to speak up and report any wrongdoing that could put the organization, our patients, clients or members, or our fellow team members at risk. At Denver Health, you are protected from retaliation or retribution for voicing your concerns.

What if my supervisor or team members are involved in what I need to report?

The ValuesLine program is designed so that implicated parties are not notified or granted access to reports in which they are named.

Does Denver Health really want me to report concerns if I am unsure about them?

Yes. You are the most qualified and best person to speak to what is working in your work environment, and we rely on hearing from you to understand when there may be a cause for concern. When you raise a concern in good faith, you are doing the right thing. If you are not sure whether what you have observed is a violation, the EthicsPoint system will help you prepare and submit a report so that it can be properly understood. We would rather you report a situation that turns out to be harmless than to let possible unethical behavior go unchecked because you weren't sure.

#### Denver Health ValuesLine User Guide

I am aware of misconduct, but it doesn't affect me. Why should I report it?

All unethical behavior or misconduct, at any level, can negatively impact the organization, or patients, clients or members, or our team members. When you consider the corporate scandals that end up in the news, keep in mind that there were probably many persons aware of the incidents or misconduct that ultimately led to the scandal. Consider it your duty to yourself and your team members to report misconduct and unethical behavior.

What if I remember something important after I file a report? Or what if a reviewer assigned to my case has questions?

When you file a report, either through the web-based form or through a phone call, you receive a unique username and will choose a password so that you can access the EthicsPoint system even after you submit a report. You will also receive a Report Key that gives you access to your own report (you will not have access to any other reports in the system). You can access the system and make updates to your report for as long as it remains open. We strongly suggest that you return to the site to check for any updates from the reviewer assigned to your report, and to provide any additional information that is requested of you or that you want to add. If you submitted your initial report anonymously, any additional information you submit will also be anonymous and treated with same strict confidence as your initial report.

#### Making a report anonymously

May I submit a report and remain anonymous?

Yes. If you want to remain anonymous, you may indicate that when making a report – whether through the online form or a phone call.

Should I remain anonymous when submitting a ValuesLine report?

That is up to you. You are welcome to remain anonymous if you do not want the persons reviewing your concern to know who you are.

Why should I consider sharing my identity when making a ValuesLine report?

Again – it is completely up to you to decide if you want to remain anonymous when making a report. If you want the person assigned to your report to contact you and learn more from you about your concern, you are welcome to provide your contact information.

If I remain anonymous, will the person assigned to review my case still be able to provide follow-up or ask for more information?

Yes. When you submit a report, you will be given a Report Key. Your Report Key will allow you to log back in to EthicsPoint and view any follow-up communications or a final outcome status, including any requests for additional information. It is your responsibility to keep your Report Key. If you lose it, there is no way for us to be able to find it for you since your anonymity is protected. You can also provide an email address that will not be shared with anyone at DH but will be used by the EthicsPoint system to automatically send you an email notification when there is an update for you. If you do not provide an email address, it is up to you to remember to use your Report Key and periodically check for any updates in the system.

What if I don't want to remain anonymous when submitting my report?

There is a section in the report form where you can provide your name and contact information. Providing your contact information can be a good way to ensure those reviewing your concern or allegation can reach you and learn more so that their review is thorough and based on accurate information.

# Denver Health ValuesLine User Guide Security and Confidentiality

Where does my ValuesLine report go and who can access them?

Reports are entered directly into the EthicsPoint secure server to prevent any possible breach in security. Reports are received by a select group of Compliance Program team members who evaluate the report and determine who will investigate the report based on the nature of the concern or allegation. Only those assigned to review a report will have access to it.

It is my understanding that any report I send from a DH computer generates a server log that shows every website my computer connects with. Won't this log identify me as a report originator?

EthicsPoint does not generate nor maintain any internal connection logs with IP addresses, and so no information linking your computer to EthicsPoint is available. In fact, EthicsPoint is contractually obligated not to pursue a reporter's identity.

Can I file a report from home or another location and not on a DH-computer?

Yes. You may submit a report from a non-DH computer at any location by going to <a href="http://www.denverhealth.ethicspoint.com">http://www.denverhealth.ethicspoint.com</a>. You may also use a phone by calling 1-800-273-8452 or by using this QR code:

Is the telephone toll-free hotline confidential and may I choose to remain anonymous if making a report via phone?

Yes. You will be asked to provide the same information you would provide in a web-based report, and an interviewer will type your responses into the EthicsPoint system. You may tell the interviewer that you would like to remain anonymous. Reports received via phone have the same security and confidentiality measures applied to them during delivery of the reports.

I want to make a report anonymously and am concerned that the information I provide in my report may ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system is designed to protect your anonymity. However, you can help protect your own anonymity by making sure that what you report does not reveal who you are by revealing your work location (e.g., I can hear Jan Smith making inappropriate comments from my desk) or other identifying information (e.g., In my 25 years at Denver Health...).

Please note – the Compliance Program and our trained reviewers will do all we can to resolve allegations of wrongdoing or noncompliance in confidence. While we may inadvertently identify who you are through the course of an investigation, we will keep your identity confidential to our greatest ability and within the limits of the law. You will be directly notified if we find out your confidentiality and anonymity has been breached.

### Who do I contact if I have other questions?

Please reach out to Enterprise Compliance Services at 303-602-3255 or send an email to <a href="ValuesLine@dhha.org">ValuesLine@dhha.org</a> or <a href="Compliance@dhha.org">Compliance@dhha.org</a>. A Compliance Program team member will help you with any additional questions you might have.