

Compliance Line Service

FREQUENTLY ASKED QUESTIONS

Q: What is the Compliance Line?

A: The Compliance Line is a confidential, third-party telephonic and Internet based reporting system that allows for legal or regulatory concerns to be expressed, managed, resolved and reported to reduce risk within the organization.

Q: Why do we need a Compliance Line?

A: Open channels of communication help create a positive and ethical work environment. The use of such reporting systems, including anonymous reporting, has been recommended for all healthcare organizations by the Office of Inspector General of the Department of Health and Human Services. By outsourcing our Compliance Line to an outside organization, HonorHealth ensures coverage of the Compliance Line 24 hours a day, 365 days a year and provides a secure, anonymous manner for employees to follow-up on their reported concern, if they so desire. It is important that HonorHealth maintains an environment in which employees can identify instances of misconduct or other serious regulatory or ethical concerns.

Reporting – General

Q: May I report using either the Internet or the telephone?

A: Yes. By providing choices, HonorHealth helps ensure that employees can file a report in the manner most comfortable or convenient to them. To report by telephone, you may call the HonorHealth Compliance Line number at: **844-732-6241**. The Compliance Line is available 24 hours a day, 365 days a year. To report through the Internet, click on the appropriate link from the HonorHealth Compliance Services Intranet page, or go directly to www.honorhealth.ethicspoint.com and click on **"Make a Report."** The Compliance Line is available 24 hours a day, 365 days a year. You may make a report using any computer with Internet access.

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

A: Yes, you can call the toll-free HonorHealth Compliance Line **844-732-6241** available 24 hours a day, 365 days a year.

Reporting Security & Confidentiality

Q: May I make a report anonymously?

A: Any employee who contacts the HonorHealth Compliance Line may remain anonymous. To the fullest extent permitted by law, HonorHealth will protect the identity of persons who contact key staff with questions or concerns. HonorHealth maintains a non-retaliation policy which means any person who raises concerns in good faith, asks a question, or reports suspected misconduct will not be retaliated against. If a suspected concern turns out to be unfounded but was reported in good faith, the person reporting the concern will not be retaliated against for bringing it to the attention of HonorHealth.

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

A: Any report made through the Compliance Line, regardless of source, will remain secure and anonymous, if requested. An anonymous reporter's identifying information is not shared with HonorHealth by the outside Compliance Line vendor.

Q: I am concerned that the information I provide the Compliance Line will ultimately reveal my identity. How can you assure me that will not happen?

A: The Compliance Line system is designed to protect your anonymity if you choose to make an anonymous report. However, certain information you provide might inadvertently reveal your identity. The Compliance Services Department is focused on addressing potential concerns, not identifying anonymous reporters.

Q: What if I want to be identified with my report?

A: There is a section in the report for identifying yourself, if you wish. We encourage reporters to identify themselves to better assist in the resolution of potential concerns.

Q: How do I obtain a status on my reported concern? What if I submitted a report and have additional information to provide?

A: When reporting a concern through the Compliance Line, you will be provided a "Report Key" which is a unique number that will allow you to obtain a status of your report. You may also provide additional information when checking on the status of your report.

Tips & Best Practices

Q: Why should I report concerns?

A: 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 notify the appropriate people of suspected concerns. In addition, as recipients of governmental funds, HonorHealth has a responsibility to ensure these funds are appropriately received and used in accordance with legal and ethical obligations. Reporting can alert management to potential concerns, providing an opportunity to correct any issues, minimizing potential negative effects on HonorHealth. Our Code of Conduct outlines the appropriate manner in which we carry out the organization's Mission.

Q: What type of situations should I report?

A: The HonorHealth Compliance Line is designed to receive reports regarding issues or practices that may constitute a violation of the law, a regulation, or HonorHealth policies. For instance, individuals may use the Compliance Line to report ethical issues related to financial matters and internal controls including such concerns as inappropriate billing or coding; falsifying medical records; inappropriate access, use or disclosure of patient information; inappropriate financial arrangements with physicians; improper handling of gifts; improper accounting; and workplace fraud or theft. Employees should continue to use MIDAS or their respective reporting mechanism for patient and visitor safety related concerns. Concerns related to personnel matters should be reported directly to management or the Human Resources Department.

Q: If I see a violation, shouldn't I just report it to my manager or supervisor and let them deal with it?

A: You are always encouraged to report suspected violations or questionable ethical conduct to your manager or other HonorHealth leader. The Compliance Line reporting process is an additional tool available if you have a concern, especially if you do not feel comfortable with alternative reporting methods. Reports filed through the Compliance Line can be filed anonymously, and all report information is secure and held in the confidence to the extent allowable by law.

Q: I am not sure what I observed or heard is a violation of HonorHealth policies and procedures, or involves unethical conduct, but it just does not look right to me. What should I do?

A: We encourage you to speak up about any situation you may be concerned about. Speak to your manager or supervisor, Compliance Officer, or file a report through the Compliance Line service. We would rather you report a situation internally or through the Compliance Line that turns out to be harmless than to let possible unethical behavior go unchecked.

Q: I am aware of some individuals involved in unethical conduct, but it doesn't affect me. Should I report it?

A: Misconduct has implications for the entire organization and consequently all employees and business partners. HonorHealth is committed to enforcing applicable legal requirements, as well as its own policies and procedures. Unethical conduct, at any level, ultimately hurts everyone. If you know of any incidents of violations of law or policies consider it your responsibility to report it even if it doesn't directly impact you or your job.

Q: Where do these reports go? Who can access them?

A: Reports are entered directly into the Compliance Line system to prevent any possible breach in security. These reports are made available to the HonorHealth Compliance Services Department who may act in conjunction with other operating units to address and resolve the issue.

Other Questions or Comments?

Q: What if I have additional questions about the Compliance Line not listed here?

A: Please contact the Compliance Services Department for any questions you might have about the Compliance Line or HonorHealth's Compliance Program. You may also contact your Compliance Officer or HonorHealth's Vice President, Chief Audit and Compliance Officer.