



Compliance Hotline Response

C-03

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PURPOSE:

To provide details and outline procedures regarding the Compliance Hotline made available to the Bristol Hospital and Health Care Group (Bristol Health) to report fraud, waste, abuse and other compliance and privacy related concerns.

POLICY STATEMENT(S):

In an effort to help uphold its values, Bristol Health will provide a method for the Workforce, members of the medical staff, patients and other interested individuals to report concerns or to make inquiries and to remain anonymous, if so desired.

The Workforce and those conducting business with Bristol Health are required to report actual or suspected Wrongful Conduct. Anyone who makes a Good Faith report of suspected Wrongful Conduct will not be subjected to Retaliation for the act of reporting.

The Workforce cannot exempt themselves from the consequences of personal wrongdoing by reporting their own misconduct.

Any communication that proves to have been both unsubstantiated and made with malice or with knowledge that it was false is not protected by this policy.

Bristol Health Corporate Compliance Hotline
1-844-361-0775 or <https://bristolhealth.ethicspoint.com>
(Compliance Hotline)

DEFINITIONS:

For the purposes of this Policy, the following definitions shall apply:

Bristol Health: Includes Bristol Hospital, the Bristol Hospital Development Foundation, Bristol Health Medical Group, Bristol Health Emergency Medical Services (EMS), Bristol Health Home Care & Hospice and Bristol Health Ingraham Manor.

Good Faith Report: Reporting with the reasonable belief that it is true.

Retaliation: An adverse action taken because an individual has acted in Good Faith to make a report or participated in or with an institutional investigation, proceeding, or inquiry regarding a report and includes actions which would dissuade a reasonable person from making a report such as discharge, discipline, penalty, demotion, suspension, harassment, or any manner of discrimination against an individual, or any threat of the above. Retaliation negatively impacts significant terms of employment (e.g. salary, demotion, termination, unjustified negative evaluations or other adverse employment or personnel actions, and non- reappointment) and conditions (e.g. harassment and hostile working environments).

Workforce: Refers to all persons actively involved in accomplishing the work of Bristol Health including, but not limited to: employees, contracted individuals and volunteers.

SCOPE:

Organization-wide

PROCEDURE:

1. Bristol Health shall provide a Toll-Free telephone number and a Web-Intake site via a third-party vendor for individuals to confidentially and anonymously report compliance related concerns 24 hours a day; 7-seven days a week.
2. The Bristol Health Compliance Officer, or designee, will respond in a timely manner to questions received and/or reports made. Records and reports from any compliance investigation will be maintained in a confidential manner within the Bristol Health Compliance Office (Compliance Office) in accordance with the Bristol Health Internal Investigations policy. While Bristol Health will do its best to maintain this confidentiality, the investigation may require disclosure of the reporting person.
3. When contacted, the Compliance Hotline vendor will:
 - a. If asked, will advise the individual that information will remain confidential to the extent possible.
 - b. Ask the individual for information regarding the location, the alleged compliance violation and steps taken by the caller to respond to the situation.
 - c. Provide the individual with a "case number" assigned at the time of the initial telephone call. The individual is encouraged to write down the case number should they choose to call back for a status of the complaint.
 - d. Provide the individual with a follow-up date for their report and advise the reporter to refer to the case number when requesting a status of their report through the Compliance Hotline.
 - e. Alert Status will be assigned to the call using the following criteria:
 - i. **"Red Alert"** - Any report that indicates an immediate threat to persons or property and should be addressed immediately. Verbal notification will be made to the Bristol Health President and Chief Executive Officer. On weekends and holidays the hospital operator will be contacted at 860-585-3000.
 - ii. **"Yellow Alert"** – Reports deemed to contain time-sensitive information that requires prompt review and/or action but are not deemed to indicate an immediate threat to persons or property.
 - iii. **"Green Alert"** – those not outlined above shall be resolved within four weeks when reasonably possible.
 - f. Send an email notice to assigned contacts in the Compliance Office along with a report providing the relevant information concerning the allegation made.
4. The Compliance Office will investigate or may refer the Compliance Hotline case based on the nature of the issue as follows:
 - a. Human Resource (HR) related matters will be referred to the appropriate HR representative.
 - b. Privacy related matters will be referred to the Privacy Office.

- c. All other matters not addressed by the Compliance Office directly will be delegated elsewhere as deemed appropriate.
- d. All investigations will be completed in accordance with the Bristol Health Internal Investigations policy.

Compliance with policy requirements is subject to regulatory flexibility when applicable.

MISCELLANEOUS:

This policy may be revised, supplemented, or rescinded at any time as Bristol Health deems appropriate in its sole and absolute discretion, without prior notice. This policy (and any other policy) does not constitute a contract of employment and does not in any way limit or modify employees' at-will employment status.

REFERENCES:

United States Sentencing Commission; Federal Sentencing Guidelines, Chapter 8, Effective Compliance Program

Department of Health and Human Services – Office of the Inspector General: Compliance Program Guidance for various segments of the healthcare industry located at <https://oig.hhs.gov/compliance/compliance-guidance/index.asp>

RELATED POLICIES:

Code of Conduct

Corrective Action – Rules of Conduct

C-02 Compliance Program

C-05 Non-Retaliation

C-07 Preventing Fraud Waste and Abuse

C-11 Internal Investigations