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About the LCMC Health Compliance Reporting System via EthicsPoint

What is EthicsPoint?

LCMC Health has chosen EthicsPoint as its Compliance Reporting platform. EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist management and employees to work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Anonymous reporting of compliance concerns is available 24 hours a day, 7 days a week, 365 days a year, via a secure web portal at lcmc.ethicspoint.com or a third-party call center at 855-9COMPLY (855-926-6759).

Why do we need a Compliance Reporting System?

- LCMC Health is committed to engaging all members of its workforce in supporting a culture of compliance to ensure we conduct all our activities in an ethical and lawful manner.
- An effective reporting system is a key component of our strategy to foster a culture of integrity and ethical decision-making.
- We believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.

Reporting – General

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 telephone at 855-9COMPLY (855-926-6759) or the Internet at lcmc.ethicspoint.com.

Is there a charge for making a report by phone?

No, the 855-9COMPLY (855-926-6759) is a Toll-Free telephone number.

How long does it take to submit a phone or web report?

You can report a concern in under 5 minutes, by either phone or web.

What type of situations should I report?

The EthicsPoint system is designed for you to report any concern you may have, including suspected violations of law or LCMC Health policies or Code of Conduct.

What are some examples of concerns I would report through the Compliance Hotline?

HIPAA privacy, data security, and fraud, waste, and abuse issues; suspected improper billing practices, such as upcoding or billing for services not provided; concerns about gifts or benefits given to patients, employees, or physicians; possible retaliation.

How is the Compliance Reporting System different from B Safe?

The Compliance Reporting System is intended for concerns related to compliance with laws, regulations, and policies; ethical concerns; privacy and data security issues; and reports of suspected wrongdoing. B Safe is intended for reporting of patient safety and quality incidents and good catches.

What if I report my concern using the wrong system?

The Compliance, Risk Management, and Quality Departments work together very closely, so no matter where you report your concern, it will be routed to the right department to fully address the reported concern.

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

When you observe some behavior that you believe violates our code of conduct, we expect you to report it. You are free to choose whether to bring any concerns forward to your direct manager or other member of our management team or report directly through EthicsPoint. We recognize that there may be circumstances when you are not comfortable reporting the issue to a member of management. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself.

Why should I report what I know? What's in it for me?

Integrity is one of LCMC Health's Shared Values. Acting with integrity requires that you report any concerns you have regarding suspected wrongdoing. We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten the livelihood of an entire Health System.

Does management really want me to report?

We certainly do. In fact, we need you to report. You know what is going on in our Health System - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the Health System, our workforce, and our patients. Also, offering positive input may help identify issues that can improve corporate culture and performance.

What happens after I report my concern? Who has access to my report?

Only the Compliance Department has access to your report. After a report is received, the Compliance Department will promptly launch an investigation into your concern. The

Compliance Department is committed to conducting timely, thorough, and effective investigations.

It is the policy of the Compliance Department to remain neutral and unbiased throughout the investigation, and only make recommendations for corrective action that are supported by the available facts and evidence. The Compliance Department will provide guidance to the leaders of affected departments in the creation of corrective action plans and will maintain oversight of plan strategies, which may include development of policies, training/education, and auditing/monitoring programs.

Isn't this system just an example of someone watching over me?

No, the EthicsPoint system is intended to serve as a tool to help us achieve our Shared Value of integrity. Reports made through EthicsPoint assist us in ensuring we maintain an ethical, compliant, and professional workplace consistent with the standards outlined in our Code of Conduct. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

Reporting Security & Confidentiality

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

No, EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

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

Yes. 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.

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

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...".

Is the telephone toll-free hot line 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.

If I don't choose to remain anonymous, couldn't I get in trouble for reporting?

No, LCMC Health, its member hospitals, and affiliates maintain a Zero Tolerance Policy with respect to retaliation against employees who make reports in good faith.

Tips & Best Practices

I am not sure if what I have observed or heard is a violation of Health System 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.

What if I remember something important about the incident after I file the report? Or what if the Health System 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 report key 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 by a Health System representative 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 Health System questions. You and the Health System now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

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

Yes. all EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

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 to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.

Are there any tips I should keep in mind when making my report?

Try to give as much detail about your concern as possible, even if you choose to remain anonymous, so the Compliance Department has enough information to fully investigate your concern. You can also attach documents to web reports if you have anything you want us to have to investigate your concern.