

AdventHealth Compliance Hotline

FREQUENTLY ASKED QUESTIONS

Q: What is the Compliance Hotline?

A: The Compliance Hotline 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 Hotline?

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 Hotline to an outside organization, AdventHealth ensures coverage of the Compliance Hotline 24 hours a day, 365 days a year and provides a secure, anonymous manner for team members to follow-up on their reported concern if they so desire. It is important that AdventHealth maintains an environment in which team members can identify instances of misconduct or other serious regulatory or ethical concerns.

General Reporting Questions

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

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

Q: Can I still file a report if I do not have access to the Internet?

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

Reporting Security & Confidentiality

Q: May I make a report anonymously?

A: Yes. Any team member who contacts the AdventHealth Compliance Hotline may remain anonymous. To the fullest extent permitted by law, AdventHealth will protect the identity of persons who contact key staff with questions or concerns. AdventHealth 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 AdventHealth.

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

A: Any report made through the Compliance Hotline, regardless of source, will remain secure and anonymous, if requested. An anonymous reporter's identifying information is not shared with AdventHealth by the Compliance Hotline vendor. Reporters who elect to remain anonymous have the option to provide their email address to receive email notifications when the investigator posts a follow-up to the case. If an anonymous reporter opts to provide their email address, it will not be visible in EthicsPoint; it is only used for system automated emails.

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

A: The Compliance Hotline 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 Department investigative process 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 form 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 Hotline, 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. The Report Key is unique to your case and is not provided to AdventHealth. If you do not have your Report Key, you will not be able to receive a follow-up response to your case nor will you be able to provide additional information. Make sure to write down your Report Key to access information about 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 persons of suspected concerns. In addition, as recipients of governmental funds, AdventHealth 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 issues, minimizing potential negative effects to AdventHealth. 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 AdventHealth Compliance Hotline is designed to receive reports regarding issues or practices that may constitute a violation of the law, a regulation, the Code of Conduct or AdventHealth policies. For instance, individuals may use the Compliance Hotline to report ethical issues related to financial matters and internal controls including such concerns as inappropriate billing or coding; falsifying medical records; substandard quality of care; inappropriate access, use or disclosure of patient information; inappropriate financial arrangements with physicians; improper receipt of gifts;

improper accounting; and workplace fraud or theft. Team members should continue to use Origami 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 AdventHealth leader. The Compliance Hotline reporting process is an additional tool available if you have a concern, especially if you do not feel comfortable with alternative reporting methods or if you have raised concerns but feel they were not adequately addressed.

Q: I am not sure what I observed or heard is a violation of AdventHealth 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, Regional Compliance Officer, or file a report through the Compliance Hotline. We would rather you report a situation internally or through the Compliance Hotline that turns out to be harmless than to let possible unethical behavior go unaddressed.

Q: I am aware of 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 team members and business partners. AdventHealth is committed to enforcing applicable legal requirements, as well as its Code of Conduct and policies and procedures. Unethical conduct, at any level, hurts everyone. If you know of any incidents of violations of law or policies, consider it your responsibility to report it even if it does not directly impact you or your job.

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

A: Reports are entered directly into the Compliance Hotline to prevent breach in security. These reports are made available to the AdventHealth Compliance 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 Hotline not listed here?

A: Please contact the Compliance Department for any questions you might have about the Compliance Hotline or AdventHealth's Compliance Program. You may also contact your Regional Compliance Officer or AdventHealth's Senior Vice President, Chief Compliance Officer. Additional information about AdventHealth's Compliance Program may be found in the Compliance Program Manual.