

## What Is the Corporate Integrity Program?

In 1999, Nationwide Children's Hospital ("Nationwide Children's") created its Corporate Integrity Program (the "Program"). The purpose of the Program is to prevent, detect, and resolve conduct that does not conform to federal and state laws and regulations, as well as Nationwide Children's policies and procedures and our Standards of Conduct. The entire Nationwide Children's community is part of the Program and staff is expected to best represent the organization by conducting themselves in a responsible, ethical, and legal manner at all times. The Nationwide Children's value of "*doing the right thing*" represents our organization's commitment to the Program.

## What's the Role of the Compliance Office?

The Nationwide Children's Compliance Office ("CO") includes the Office of Compliance & Integrity and the Office of Research Compliance & Integrity. The CO is in charge of overseeing and monitoring the Program. The CO is here for everyone from Nationwide Children's staff to patients and their families. It provides advice, education, and audits and reviews issues related to compliance topics.

## Why Is Compliance Important?

Compliance is Important for many reasons. The most important reason is that our community, our patients, and their families expect us to conduct our business in a legal, ethical, and responsible manner. Non-compliance can lead to governmental fines and sanctions that can hurt our reputation and affect funding – ultimately affecting our ability to provide the best care possible to our patients.

## How Do I Recognize a Compliance Issue?

Compliance applies to the work we do every day. Here are some questions to consider:

- Am I handling Protected Health Information ("PHI") or other confidential information? If so, is it being properly secured (encrypted) before I send it or share it?
- Am I allowed to share this PHI or other confidential information? Has there been a breach of patient confidentiality?
- Do I or someone else at Nationwide Children's have a personal or financial consideration that may create a conflict of interest with our duties at Nationwide Children's?
- With concern to research, has there been potential misconduct in a study? This may involve tampering with research data or property, or unacknowledged conflicts of interest.
- Have we billed for services that Nationwide Children's did not perform? Have we properly documented services? Are the services medically necessary?
- Is an individual being discriminated against?
- Are we conducting business in compliance with applicable government rules and regulations?

## How Do I Report a Compliance Concern?

It is everyone's duty to report any conduct you reasonably believe is illegal, unethical, in violation of Nationwide Children's policies and procedures, or otherwise questionable. The CO encourages you to report issues so that they can be properly investigated and addressed. You do not need permission to contact the CO. Failure to report a known violation may result in corrective action even if you were not personally involved in the violation. There are several ways that you can report a compliance concern: You are encouraged to contact your direct supervisor or manager to discuss your concerns. If your concern is not addressed or resolved at that level, you are encouraged to relay your concerns to the next level of management or through the other reporting options below. You can always contact the Office

of Compliance & Integrity at (614) 355-0400, Human Resources at (614) 355-4111, or speak directly with your Administration or Physician Leader.

## Call the Hotline at 1 (877) 267-1935

If you do not want to report the issue to the resources above, you are also welcome to make an anonymous report by calling the hotline at (1-877-267-1935) or by reporting online at <https://NCH.EthicsPoint.com>

These reporting methods are anonymous and do not require you to provide identifying information.

## How does the Compliance Hotline work?

Anonymous reporting is available 24/7 and it is received by an unaffiliated third party vendor – not by Nationwide Children's staff. If you call the hotline, your call is not recorded or traced in any way. If you make a report via the website, there is no way to trace the individual making the report.

The third party receiving your report compiles the information and provides it to the CO so that an investigation may be conducted. Every report is investigated. You may call the hotline or access the website to receive updates on the progress of the investigation or to provide additional information.

## Is there a Non-Retaliation Policy?

Yes. Nationwide Children's has an open door policy and welcomes everyone to voice their concerns without fear of retaliation. All reports are taken seriously. No action of retaliation will be taken against anyone who, in good faith, reports a concern to management, Human Resources, the CO, or the hotline or website. However, reporting does not protect anyone from corrective action regarding their own unacceptable performance or conduct.

## How do I contact the Compliance Office?



**Kathleen Dunn**  
VP & Chief Compliance Officer  
(614) 355-0402



**Julia Leo**  
Associate Compliance Officer  
(614) 355-0414



**Janessa Piedra Hackett**  
Compliance Audit Manager  
(614) 355-0437



**John Grosh**  
Compliance Coordinator  
(614) 355-0403



**Michelle Nguyen**  
Conflicts of Interest Administrator  
(614) 355-3151



**Robyn Cunningham**  
Director, Office of Research  
Compliance and Integrity  
(614) 722-2599

## Where do I learn more about the Compliance Office or the Corporate Integrity Program?

Additional information can be found on ANCHOR, the Nationwide Children's intranet page, located at: <https://nationwidechildrens.sharepoint.com/sites/A10045>.

To learn more about Research Compliance, visit their Nationwide Children's intranet page, located at: <https://nationwidechildrens.sharepoint.com/sites/R10050/SitePages/Office-of-Research-Compliance-and-Integrity.aspx>

### Compliance Vision Statement

Our vision is to ensure and support an ethical culture of compliance through prevention, detection and remediation.

### Compliance Mission Statement

Our mission is to promote integrity and compliance through open communication, education and oversight across the organization in order to deliver the highest quality health care.

### Don't forget . . .

- Nationwide Children's has a non-retaliation policy.
- Make a report when there is a potential violation or if you are concerned about any possible compliance issues.
- The CO can always provide additional compliance education for your area if needed or requested.
- The CO is here as a resource, not as the police. We are here to help everyone at Nationwide Children's maintain the highest ethical standards.

## Nationwide Children's Hospital Corporate Integrity Program

