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## About the Business Practices *EthicsLine*

### What is the Business Practices *EthicsLine*?

The Business Practices *EthicsLine* is a comprehensive and confidential reporting tool that enables management and employees to work together to address fraud, abuse, and other misconduct in the workplace while cultivating a positive work environment. Houston Methodist has contracted with NAVEX Global to operate and host the Business Practices *EthicsLine* hotline number and website.

### Why do we need a system like the Business Practices *EthicsLine*?

- Our employees are our most important asset. By creating open channels of communication, we promote a positive work environment of doing the right thing!
- One of the elements of an effective compliance program is the maintenance of a hotline to receive complaints and protect reporters from retaliation. In that spirit, reports may be made anonymously if desired.
- An effective reporting system augments our commitment to maintaining a culture consistent with our ICARE values.

## Reporting – General

### May I report using either the Internet or the telephone?

Yes. The Business Practices *EthicsLine* enables you to file a confidential, anonymous report via either the telephone or the Internet. You also have the option to identify yourself when placing the report.

### What types of situations should I report?

The Business Practices vision is that all actions taken in the name of Houston Methodist are consistent with strong moral values, high ethical standards and the law. Any action that violates this vision is considered a Questionable Practice and should be reported. The Business Practices *EthicsLine* allows employees, vendors and those affiliated with Houston Methodist to report any Questionable Practice, or other concern.

Please note: There is a separate line to report Biomedical Ethics issues (ex. advance directives, surrogate decision-making, etc.) If reported here, they will be routed to the Biomedical Ethics group for review.

### **What are some examples of Questionable Practices that should be reported?**

- Disclosing or accessing confidential information without authorization
- Falsifying financial data or patient records
- Submitting a false claim for payment
- Accepting personal gifts in return for Houston Methodist business
- Charging for a service that was not rendered
- Sending offensive emails
- Coding procedures or diagnoses incorrectly
- Mistreating a patient, staff member or others associated with Houston Methodist
- Violation of Business Practices and other Houston Methodist policies

### **Can I just report a Questionable Practice to my supervisor, Entity Business Practices Officer or Human Resources, instead of using the Business Practices *EthicsLine*?**

Yes. When you observe some behavior that may be a questionable practice, we expect you to report it. Ideally, you should first consider discussing the issue with your supervisor. If your particular concern makes discussion with a supervisor inappropriate or uncomfortable, you can also contact HR (for employment-related issues), your Entity Business Practices Officer, or the Houston Methodist Business Practices Officer.

We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with NAVEX Global to operate and host the Business Practices *EthicsLine* hotline number and website. We would rather you report anonymously than not report at all.

### **Does management really want me to report?**

We certainly do. In fact, we *need* you to report. Reporting questionable practices is part of each employee's responsibility to make Houston Methodist better. You may have initial knowledge of an activity that may be cause for concern. Management wants to be aware of any practice or concern that is believed to violate Houston Methodist's values or the law so it can be addressed.

### **Where do these reports go? Who can access them?**

Reports are entered directly on NAVEX Global's secure server. Once a report is submitted, it is assigned to specific individuals within Houston Methodist for investigation, based on the type of issue and location of the incident. For HR-related allegations, the report will be referred to HR for investigation. Each of these report recipients has had training in handling these reports in a confidential manner.

## Reporting – Security & Confidentiality

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

A report from home or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the Business Practices *EthicsLine* system strips away Internet addresses so that anonymity is totally maintained.

### I am concerned that the information I provide the Business Practices *EthicsLine* will ultimately reveal my identity. How can you assure me that will not happen?

The Business Practices *EthicsLine* system protects 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 include details that would reveal your identity by accident. For example, “From my office next to Jan Smith...” or “In my 33 years at Houston Methodist...”.

### 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 Business Practices *EthicsLine* website. 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 to identify yourself, if you wish. Benefits of identifying yourself, if you are comfortable, include direct communication and partnership with the investigator to answer follow-up questions and assist in the efficient investigation of your concern. Please be reminded Houston Methodist policy and federal and state laws protect you from retaliation when you report a questionable practice or concern in good faith.

## Tips & Best Practices

### I am aware of some individuals acting unethically, but it doesn't affect me. Why should I bother reporting it?

You have a duty to report Questionable Practices. Reporting a Questionable Practice identifies issues that might not otherwise be raised and leads to resolution of these issues. If you become aware of a practice that may violate Houston Methodist's values or the law and you do not report it, you may be subject to disciplinary sanctions even if you were not involved.

### I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

**What if my boss or other members of management are involved in a violation? Won't they get the report?**

The Business Practices *EthicsLine* system and report distribution ensure that implicated parties are not notified or granted access to reports in which they have been named.

**What if I have additional information to add after I file the report? Or what if the company has further questions for me concerning my report?**

When you file a report online or via telephone, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the Business Practices *EthicsLine* system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a Houston Methodist representative. We strongly suggest that you return to the site periodically to check if the investigator is requesting additional information.

All follow-up Business Practices *EthicsLine* correspondence is held in the same strict confidence as the initial report. By following up, you can get the investigator's name and contact information to communicate directly, if you wish, or you can continue communicating via a web dialogue between you and the investigator of your report.

**What if I lose my Report Key or forget the Password I created?**

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.