



Procedure Title: Compliance Hotline

Objective:

SHORE is committed to the timely identification and resolution of all issues that may adversely affect employees, customers or the organization. SHORE has established communication channels to report problems and concerns, including a telephone hotline. Employees are encouraged to report problems or concerns, either anonymously or in confidence via the hotline when they deem appropriate. The hotline establishes a venue for employees or interested parties to report suspected criminal activity, illegal or unethical conduct occurring within the organization in the event other resolution channels are ineffective or the caller wishes to remain anonymous. Under the Deficit Reduction Act of 2005, employees must be informed about laws regarding false claims, protection for whistleblowers and hospital procedures for protecting federally funded healthcare programs from fraud, waste and abuse. SHORE has developed a separate policy entitled “Fraud, Waste and Abuse Protection, the Federal Deficit Reduction Act of 2005 and the False Claims Act, which provides information and guidance on its approach to compliance with federal and state laws and methods of reporting, including a hotline.

Scope: Organizational

Definitions:

SHORE - Shore Memorial Health System, its not-for-profit subsidiaries, including Shore Memorial Hospital, D/B/A Shore Medical Center, Shore Memorial Health Foundation and Shore Health Services Corporation.

CCO – Chief Compliance Officer

CEO- Chief Executive Officer

CP - Compliance Program

OIG - Office of the Inspector General

Policy:

All employees and others affiliated with our organization are responsible for reporting misconduct, including actual or potential violations of law, regulation, irregularities or procedures or the Code of Ethics or false claims, or inappropriate or illegal billing. Failure to report a violation may result in appropriate disciplinary action.

Procedure:

SHORE has contracted with an independent external agency to maintain and operate a compliance hotline that employees, vendors, contractors, members of medical staff or other interested persons may use to report problems and concerns either anonymously or in confidence.

1. The CCO is responsible for overseeing operation of the hotline, including ensuring that all hotline calls are addressed in an appropriate and timely manner, as well as in accordance with these and all related policies, guidelines and procedures.
2. Employees are strongly encouraged to report problems and concerns via the chain-of-command, human resources or CCO before resorting to the hotline. All levels of managers will be accessible to employees to encourage the reporting of problems and concerns.
3. The hotline will be available to employees 24 hours per day, 7 days a week, for employees who wish to remain anonymous and/or when other methods of reporting have not resolved an employee's concerns. The hotline will be answered by a live person who will debrief the caller and make a report on all information provided.
4. The hotline telephone number will be made readily available to all employees by conspicuously posting the telephone number in common work areas and in other ways, and is also accessible through access on the internet on the SHORE website, which may be accessed at www.shoremedicalcenter.org/corporatecompliance.
5. Employees who report problems and concerns via the hotline in good faith will be protected from any form of retaliation or retribution, and any employee who commits or condones any form of retaliation will be subject to discipline up to and including termination.
6. Employees who willfully make false or misleading hotline reports will be subject to disciplinary action up to and including termination.
7. Employees cannot exempt themselves from the consequences of their own misconduct by reporting the issue, although self-reporting may be taken into account in determining the appropriate course of action.
8. All employees who handle hotline reports are expected to act with the utmost discretion and integrity in assuring that information received is acted upon in a reasonable and proper manner. Everyone who receives or is assigned responsibilities for hotline reports shall agree to the terms of confidentiality.
9. All employees have a duty to report inappropriate or illegal billing, misconduct, including actual or potential violations of law, regulation, procedures, guidelines or the Code of Ethics to their supervisor, another member of management, human resources or the CCO. However, the hotline channel is always available if special circumstances exist, if issues are

not being properly addressed or if an employee feels more comfortable using that means of reporting.

10. Hotline operations (call receipt and reporting) will be conducted by an independent outside agency that specializes in operating employee hotlines. The CCO is responsible for ensuring that the outside agency fulfills its contractual obligations and maintains an appropriate level of service and effectiveness including the following:
 - a. The hotline will be staffed with qualified and properly trained personnel. All callers will be given the opportunity to speak with a live operator.
 - b. All callers to the hotline will hear the same pre-recorded message explaining their rights; any limitations; non-retaliation policy and other pertinent information.
 - c. Calls will be fully documented according to procedures established with the independent outside agency and forwarded to the CCO.
 - d. Callers will be provided an identification number to protect their identity.
 - e. Callers will be asked to contact the hotline with their identification number within ten business days for any required follow-up. It is the responsibility of the CCO to ensure any required follow-up information is provided to the hotline in advance of the scheduled call-back date.
 - f. No attempt will be made to identify a caller who requests anonymity.
 - g. Whenever a caller discloses his or her identity, it will be held in confidence to the fullest extent practical or allowed by law.
11. The CCO is responsible for ensuring that all hotline calls are addressed in an appropriate and timely manner, as well as in accordance with these and all related policies, guidelines and procedures. The CCO's responsibilities include:
 - a. Ensuring proper functioning of the hotline;
 - b. Establishing reporting and records maintenance procedures;
 - c. Logging and tracking all calls to resolution;
 - d. Conducting appropriate investigations and follow-up;
 - e. Referring calls when appropriate;
 - f. Providing feedback to callers when necessary; and
 - g. Maintaining security for all calls and related documents.
12. The CCO will ensure all calls are brought to final resolution and closure. The CCO will involve other SHORE departments or entities, as appropriate, in the resolution of issues identified in hotline reports. All inquiries/investigations will be conducted and documented in accordance with the Compliance Issue Resolution policy. If the CCO is not, in good faith, satisfied that a matter referred to other SHORE departments or entities has been appropriately addressed and resolved, the CCO will be responsible for and is authorized to take the matter to other persons in positions of authority.
13. The CCO will report periodically to the Audit Team, the CEO and the Board of Trustees' Compliance and Ethics Committee regarding hotline activity. This report will include the total number of calls received, actions taken, and general results from the hotline operation. In addition, the report will include any recommendations for system-wide improvements or corrective actions arising from the results of the operation and related investigations.

14. As part of auditing and monitoring the hotline operation, there will be an ongoing review to ensure compliance with this policy and correction of identified discrepancies. The CCO will report the results of this review to the Audit Team, the CEO and the Board of Trustees Compliance & Ethics Committee.

15. The CCO will maintain all hotline records, including investigative information, in a locked cabinet with access limited to officially authorized individuals, and in accordance with the Compliance Office Records Management policy. These records will be maintained for at least one year from closure of that particular hotline issue or for duration of time that may be required by statute or regulation.