

CVMC Administrative Policy & Procedure

APPROVALS	
Committee	Date
Leadership Council	09/28/2016

Section	<b>Corporate Compliance</b>
Policy No.	CORP-6
Pages	2
Original Date	05/01/1999

**SUBJECT: HOTLINE REPORTING POLICY**

**CORP-6-I. POLICY**

Catawba Valley Medical Center provides individuals with a means for reporting potential compliance violations on an anonymous and confidential basis and without fear of repercussion or retaliation. The means for making such reports is through the compliance Hotline. The goal of this policy is to ensure that an open line of communication exists between hospital personnel and the Corporate Compliance Officer.

**CORP-6-II. POLICY DETAIL**

- A. The Hotline Telephone Number (888) 398-2633 is available from 9:00 a.m. to 8:00 p.m. EST Monday through Friday (excluding designated holidays) to individuals wishing to report actual or potential compliance violations, including those involving billing and claims submission, fraud and abuse laws, and/or other regulations. The Hotline service is operated by the personnel of the Compliance Hotline Vendor, which is an entity that is completely independent of the Hospital and which engages in the business of providing hotline services to others.
- B. Hotline reports generated by the Compliance Hotline Vendor shall be forwarded to the Compliance Officer for review.
- C. Hotline reports suggesting a violation of compliance policies or laws will be investigated promptly in a confidential and reasonable manner by the Compliance Officer or his designee.
- D. Individuals shall not be subject to retaliation on the part of any person affiliated with Catawba Valley Medical Center based on reports submitted in good faith. Any such retaliation is a violation of the compliance program and should be reported immediately to the Compliance Officer.
- E. Individuals may make Hotline reports on an anonymous basis if they desire.
- F. If an individual does not wish to utilize the Hotline or other reporting structure due to compliance committee membership involvement, the individual may make his/her report to the President/CEO, instead.
- G. An investigative response will be forwarded to the Compliance Hotline Vendor by the Compliance Officer for any scheduled follow-up by the reporting individual.
- H. The Compliance Officer will present the conclusions, recommendations, and actions taken by the Compliance Officer, his designee, or the Corporate Compliance Committee to the Quality Coordinating Council on a bimonthly basis. The Compliance Officer and the Chair of the Quality Coordinating Council shall report to the Board of Trustees any significant compliance issues.
- I. The Hospital will strive, to the extent reasonable, to keep confidential the identity of any individual making a report. However, individuals should be aware that there may be a point where an individual's identity may become known or may have to be

revealed, such as in certain instances when governmental authorities become involved.

- J. The Hotline number is included in the CVMC Telephone Directory under the listing “Corporate Compliance Hotline,” and is conspicuously posted in common work areas designated by the Compliance Officer. Hospital personnel should also be aware that the OIG operates the following hotline: 1-800-HHS-TIPS (447-8477).
- K. Patient safety or quality of care concerns may be reported directly to The Joint Commission. As an accredited organization, CVMC agrees that it will take no retaliatory or disciplinary action because an employee reports safety or quality of care concerns to The Joint Commission.

The Joint Commission contact information:

Telephone number (8:30am – 5:00pm, Monday - Friday): (630) 792-5000

Fax number: (630) 792-5005

E-mail address: [www.jcaho.org](http://www.jcaho.org)

Review Dates: 09/28/2016, 09/09/2013, 10/18/2010, 10/31/2007, 01/03/2007, 09/23/2004, 09/04/2001