

ADMINISTRATION

POLICY MEMORANDUM

POLICY TITLE:	REPORTING CRIMINAL, ILLEGAL OR UNETHICAL CONDUCT
POLICY NUMBER:	MCH-1064
JCAHO FUNCTION AREA:	Information Management
POLICY APPLICABLE TO:	All Medical Center Health System Personnel
POLICY EFFECTIVE DATE:	July 1, 1998
POLICY REVIEWED:	10/1/99; 5/3/01; 10/10/01, 7/02; 3/30/05; 12/05; 8/10/07
POLICY REVISED:	10/10/01, 7/02; 3/30/05; 8/10/07

ALTERNATE WORD SEARCH: hotline, reporting, illegal, criminal, unethical

POLICY STATEMENT:

In order to more fully comply with Medicare and Medicaid regulations and the Guidelines of the United States Federal Sentencing Commission, Medical Center Health System (MCHS) has established a system through which employees can report criminal, illegal or unethical conduct by others within MCHS without fear of retaliation or retribution.

PROCEDURE:

1) **REPORTING**

- a) It is the policy of MCHS to take all wrongdoing seriously.
- b) Any employee who, in good faith, believes that others within MCHS have engaged in acts or practices which are criminal, illegal, unethical or violate the Standards of Conduct, should report such acts or practices through the Compliance Line or an Integrity Box.

2) **COMPLIANCE LINE**

- a) MCHS will maintain a “hot line,” known as the Compliance Line, to assist employees to report on conduct or acts and practices, which are criminal, illegal, and unethical or violate the Standards of Conduct.
- b) The “hotline” is operated 24 hours a day, 365 days a year. The number is 1-800-805-1642.
- c) Employees will be advised of the Compliance Line phone number from time to time through payroll inserts, newsletters, posters, etc.
- d) In particular, the Compliance Line should not be used for any concerns involving immediate danger to life, property, or the environment. These concerns should be brought to the attention of the immediate supervisor or appropriate person(s) so that any such concern may be promptly addressed.
- e) Reports received through the Compliance Line will be communicated to MCHS’s Compliance Officer within 24 hours of their receipt, or, in the absence of the Compliance Officer, his/her designee.
- f) Reports involving immediate danger to life, property, or the environment, however, will be immediately communicated to the Compliance Officer or, in that person’s absence, his/her designee.

3) **INTEGRITY BOXES**

- a) Locked Integrity Boxes will be located adjacent to every time clock within Medical Center Health System’s facilities.
- b) Appropriate reporting forms will be provided at each Integrity Box. However, employees may submit their written concerns on any paper format.
- c) Envelopes will be provided at the Integrity Box sites and employees are encouraged to utilize these envelopes (or their own envelopes) to promote security to their reports and concerns.
- d) The Compliance Officer or his/her designee will collect reports from the Integrity Boxes every week.

4) **OTHER REPORTING PROCEDURES**

- a) Employees may also directly report in person to the Compliance Officer or call 640-1900. The Compliance office is located across the hall from Utilization and Outcomes Management on the first floor.
- b) Hotline calls can be made electronically via the MCHS Intranet page under the Employee Links and then Compliance Hotline. These complaints can be anonymous also.

5) **CONFIDENTIALITY**

Employees' confidentiality will be protected to the fullest extent of the law.

AUTHOR'S SIGNATURE	
	Barbara Dingman Chief Compliance Officer
AUTHORIZING SIGNATURE(S)	
	William W. Webster Chief Executive Officer
END OF POLICY	