

<b>Policy Title:</b> FH Compliance Reporting, Hotline, Non-Retaliation Policy	<b>Last Review Date:</b> 01/29/2024
<b>Policy Number:</b> 18	<b>Next Review Date:</b> 01/29/2027

**Full Policy Title:** FH Compliance Reporting, Hotline, Non-Retaliation Policy

**Origination Date:** 12/01/2011

**Key Words:** Non-compliance, Anonymous, FH-COM.025

**Supersedes:** FH-COM.025

**Applies to:**

Health system with no exclusions

*Or the entities checked below -*

Hospitals	Physician Practices	ASCs	Other
<input type="checkbox"/> FCH <input type="checkbox"/> FHFMMH <input type="checkbox"/> FMFH <input type="checkbox"/> FMLH <input type="checkbox"/> FWBH	<input type="checkbox"/> CP <input type="checkbox"/> NEMG <input type="checkbox"/> Workforce Health	<input type="checkbox"/> DTSSC <input type="checkbox"/> FSC <input type="checkbox"/> MFASC <input type="checkbox"/> WBSC	<input type="checkbox"/> ACO <input type="checkbox"/> CIN <input type="checkbox"/> Exceedent <input type="checkbox"/> FH Home Infusion <input type="checkbox"/> FH Pharmacy Solutions <input type="checkbox"/> Inception Health <input type="checkbox"/> _____

**A. Purpose**

1. To define the obligation and responsibility of all Workforce Members to report any knowledge or reasonable suspicion of wrongdoing, unethical behavior or non-compliance with any federal or state laws and regulations, policies and procedures, or the Code of Business Conduct.
2. To affirm the organization's commitment to maintaining an environment that is free of retaliation and/or intimidation relevant to reporting a concern.
3. To outline the methods available for reporting any knowledge or reasonable suspicion of wrongdoing or non-compliance.

**B. Definitions**

**Workforce Member** – For purposes of this policy, this is a Froedtert Health or Froedtert Health Affiliate employee, volunteer, student, temporary agency staff or other persons whose conduct in the performance of work is under the direct control of Froedtert Health or a Froedtert Health Affiliate, whether or not they are paid by Froedtert Health or Froedtert Health Affiliate.

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### C. Policy Statement(s)

1. All Workforce Members are obligated and have a duty to immediately report any knowledge or reasonable suspicion of wrongdoing, misconduct, or any other form of non-compliance. This may include unethical behavior, harassment, illegal activities, any situation that may put our patients, workforce and/or the organization at risk, violation of our Code of Business Conduct, policies and procedures, or regulatory and/or accreditation requirements. Failure to report such knowledge or suspicion of non-compliance may result in corrective action up to and including termination of employment or business relationship.
2. The FH Compliance Department (FH Compliance) provides a mechanism for anonymous reporting and a process for follow up as necessary.
3. Froedtert Health (FH) prohibits retaliation or intimidation against any individual who, in good faith, reports any concerns of wrongdoing, unethical behavior and/or non-compliance.
4. Complaints or reports made directly to parties outside of FH Compliance which relate to compliance matters such as wrongdoing, unethical behavior, or any other form of noncompliance within FH operations, including anonymous reports, are to be immediately forwarded to FH Compliance for investigation. Matters that are solely related to Human Resources or employee relations are to be forwarded directly to the Human Resources Department (HR). HR will involve FH Compliance as necessary if the matter pertains to a regulatory requirement, or if the issue may involve risk or harm to the organization, workforce, or patients.
5. Investigating, mitigating risks, taking corrective action and conducting root cause analysis are integral steps to be initiated, when appropriate.

### D. Procedure

1. Concerns reported to FH Compliance are assessed no later than 48 hours of receipt. Reports made on weekends or holidays are typically assessed the next business day unless the matter is escalated and requires immediate attention.
2. Methods available to report any knowledge or suspicion of wrongdoing, unethical behavior or non-compliance are as follows:
  - a. Submit a question or concern by visiting the Compliance Reporting Website at [froedterthotline.ethicspoint.com](http://froedterthotline.ethicspoint.com)
  - b. Call the Anonymous Compliance Hotline phone at (833) 942-0798.
  - c. Email Compliance at [comphotl@froedtert.com](mailto:comphotl@froedtert.com).
  - d. Submit a concern in writing to FH Compliance at Woodland Prime via inter-office mail or through USPS mail at N74W12501 Leatherwood Ct., Menomonee Falls, WI 53051-4490.

*Printed copies are for reference only. Please refer to the electronic copy for the latest version.*

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- e. Contact any of the FH Compliance staff directly.
3. In order to properly and thoroughly investigate issues reported to FH Compliance, the following information is necessary:
  - a. Specific and detailed information related to the issue being reported (e.g., name of facility involved, first and last names spelled out, dates, times, locations, medical record numbers, all facts and pertinent information, and copies of relevant documents, if applicable).
  - b. Name and contact information of person filing the report, unless anonymous.
  - c. Names of any other individuals aware of the concern or incident.
4. FH Compliance makes every attempt to investigate all reported concerns. However, if the concern reported does not contain enough information to sufficiently investigate the matter and no contact information has been provided, the case will generally be closed until sufficient information is obtained to adequately investigate the concern.
5. FH Compliance objectively examines the issue reported and determines the appropriate next steps. In some cases, this may require the assistance of other departments, legal counsel, and/or other external parties. Operational leaders and HR may be involved with the investigation, when appropriate.
6. Workforce Members that are requested to participate in an FH Compliance Department investigation are expected to cooperate and provide truthful and accurate information. Their involvement may include an interview, or to provide information or data related to the investigation.
7. Any Workforce Member who has concerns with the manner in which a reported matter was handled by FH Compliance or others is encouraged to raise these concerns to the Chief Compliance Officer or to their senior executive leader.
8. Any individual who believes they are experiencing intimidation or retaliation as a result of reporting a concern is to report the situation to FH Compliance immediately. FH Compliance will investigate the matter, and in some cases, work in conjunction with HR to resolve. Language from Wisconsin State law 146.997 and the Federal Whistleblower Protection Act are attached to this policy which references associated rights and regulatory requirements.

#### **E. Related Policies**

1. [FH HR Corrective Action Policy](#)
2. [FH HR Harassment Free Workplace Policy](#)
3. [Froedtert Health Code of Business Conduct](#)

#### **F. Reference(s)**

1. Summary of Federal and State False Claims Laws and Whistleblower

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Protections

<http://intranet.froedtert.com/upload/docs/Froedtert%20Health/Departments/Compliance/Summary%20of%20Federal%20and%20State%20False%20Claims%20Laws.pdf>

**G. Attachment(s)**

1. N/A