

Compliance Reporting, Hotline and Non-Retaliation

description

Compliance, Non-compliance, Reporting, Report, Hotline, Retaliation, Non-Retaliation, Anonymous

Policy Number

FH-COM.025

Purpose

- A. To define the obligation and responsibility of all Froedtert Health (FH) Workforce Members to report any knowledge or suspicion of wrong doing or non-compliance of federal or state laws and regulations, FH policies and procedures, or FH Code of Business Conduct.
- B. To outline FH's commitment to promoting an environment that is free of retaliation or intimidation for any reports made in good faith.
- C. To identify the methods available for reporting any knowledge or suspicion of wrong doing or non-compliance.

Definitions

FH Workforce Members include for the purposes of this policy: employees, volunteers, students, temporary workers and members of the medical staff.

Policy

A. All FH Workforce members are obligated and have a duty to immediately report any knowledge or suspicion of wrong doing, misconduct, or any other form of non-compliance related to FH care or operations. This includes unethical behavior, harassment, illegal actions, any situation that may put our patients, staff 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.

B. The confidentiality of reports made to the FH Compliance Department will be maintained to the greatest extent possible.

C. FH prohibits retaliation or intimidation against any individual who, in good faith, reports any wrong doing, misconduct, unethical behavior or non-compliance.

D. Complaints or reports made directly to parties outside of the FH Compliance Department which relate to compliance matters such as wrong doing, misconduct, or any other form of non-compliance within FH operations, including anonymous reports, are to be immediately forwarded to the FH Compliance Department for investigation. Issues that are solely related to Human Resources or employee relations are to be forwarded directly to the Human Resources Department. Human Resources will involve FH Compliance if the issue pertains to a regulatory requirement, or if the issue may involve risk or harm to the organization or its patients.

E. Mitigating risks, taking corrective action and conducting root cause analysis are integral activities to maintain effective organizational compliance.

Procedure

A. Concerns reported to the FH Compliance Department will be assessed no later than 48 hours of receipt. Reports made on weekends or holidays will typically be assessed the next business day unless the matter is escalated and requires immediate attention.

B. Methods to report any knowledge or suspicion of wrong doing, misconduct, unethical behavior or non-compliance are as follows:

1. FH Compliance Hotline (414) 259-0220 ☒
2. FH Compliance Department Main Office (414) 805-2895 ☒
3. E-mail the FH Compliance Hotline at comphotl@froedtert.com, or internally, by selecting "FH Compliance Email" in the Outlook address book.
4. Contact FH Compliance to schedule an in-person meeting.
5. Contact any of the FH Compliance Department staff directly.
6. Access the FH Compliance Intranet Department site to submit a concern using the "Contact Us" Form.
7. Submit in writing to the FH Compliance Department at 9200 W. Wisconsin Avenue, Milwaukee, WI. 53226.

C. In order to properly and thoroughly investigate issues reported to the FH Compliance Department, the following information is necessary:

1. 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 number, all facts and pertinent information, and copies of

relevant documents, if applicable).

2. Name and contact information of person filing the report, unless anonymous.
3. Names of any other individuals aware of the concern or incident.

D. The FH Compliance Department will make 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.

E. The FH Compliance Department will objectively examine the issue reported and determine 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 Human Resources may be involved with the investigation when appropriate.

F. FH Workforce Members that are requested to participate in an FH Compliance Department investigation are expected to cooperate and to provide truthful and accurate information. Their involvement may include an interview, or to provide information or data related to the investigation.

G. Any FH Workforce Member who has concerns with the manner in which a reported matter was handled by the FH Compliance Department or others is encouraged to raise these concerns to the Chief Compliance Officer or to the appropriate senior executive leader responsible for their area of concern.

H. Any individual who believes they are experiencing intimidation or retaliation as a result of reporting a concern is strongly advised to report the situation to the FH Compliance Department immediately. The FH Compliance Department will investigate the matter, and in some cases, work in conjunction with the Human Resources Department to find resolution. Language from Wisconsin State law 146.997 and the Federal Whistleblower Protection Act is attached to this policy which references associated rights and regulatory requirements.

Reference Details

Summary of Federal and State False Claims Laws

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

Issuing Authority

FH Corporate Policy Committee

Distribution

Froedtert Health

category

Compliance,