

Name: Compliance Reporting, Hotline and Non-Retaliation

Last Review  
Date: 04/22/2021

Next Review  
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Description: Compliance, Non-compliance, Reporting, Report, Hotline, Retaliation, Non-Retaliation, Anonymous

Policy  
Number: FH-COM.025

Origination  
Date: 12/01/2011

- Purpose:
- A. 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.
  - B. To affirm the organization's commitment to maintaining an environment that is free of retaliation and/or intimidation relevant to reporting a concern.
  - C. To outline the methods available for reporting any knowledge or reasonable suspicion of wrongdoing or non-compliance.

Definitions: Workforce: For the purposes of this policy, Workforce includes employees, members of the medical staff, Froedtert Health Affiliates, volunteers, students, and temporary workers.

- Policy:
- A. 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.
  - B. The FH Compliance Department (FH Compliance) provides a mechanism for anonymous reporting and a process for follow up as necessary.
  - C. 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.
  - D. 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 non-compliance 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.
  - E. Mitigating risks, taking corrective action and conducting root cause analysis are integral steps to be initiated, when appropriate.

Procedure: A. Concerns reported to FH Compliance 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 available to report any knowledge or suspicion of wrongdoing, unethical behavior or non-compliance are as follows:

1. Call the FH Anonymous Compliance Hotline at (414) 259-0220
2. Email the FH Compliance Hotline at [comphotl@froedtert.com](mailto:comphotl@froedtert.com), or internally, by selecting "FH Compliance Email" in the Outlook address book
3. Access the FH Compliance Intranet Department site to submit a question or concern using the "Contact Us" Form (you may choose to remain anonymous)
4. Submit a concern in writing to FH Compliance at Woodland Prime via interoffice mail or through USPS mail at: N74 W12501 Leatherwood Ct. Menomonee Falls, WI 53051-4490
5. Contact any of the FH Compliance staff directly
6. Contact FH Compliance to schedule an in-person meeting
- 7.

C. In order to properly and thoroughly investigate issues reported to FH Compliance , 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 numbers, 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. FH Compliance 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. FH Compliance 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 HR may be involved with the investigation, when appropriate.

F. 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.

G. 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 .

H. 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.

Related  
Policies: [Harassment Free Workplace](#)

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>

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