


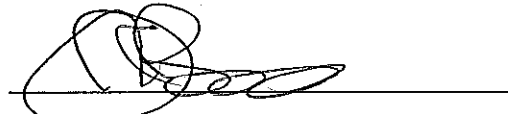
Kennebec Region Health Alliance


FUNCTIONAL AREA: LEADERSHIP
TOPIC: CORPORATE COMPLIANCE HELPLINE

POLICY #: LD-01
EFFECTIVE: 10/16
REVISED:
REVIEWED: 10/16

AUTHORIZATION:


Barbara Crowley MD, President KRHA


John Burke MD, Board Chair KRHA


Chief Compliance Officer

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- I. **PURPOSE:** The purpose of the Corporate Compliance Helpline is to provide a mechanism for employees, patients, contractors, subcontractors, and agents to report any activity that may violate Kennebec Region Health Alliance's (KRHA) Mission, Corporate Compliance Program, or state, federal, or local laws and regulations. The goal of the Corporate Compliance Helpline is to present opportunities for the identification, investigation, correction, and prevention of inappropriate activities.

The KRHA Corporate Compliance Helpline also provides an alternative mechanism for employees to report information about known or suspected non-compliance when the employee is uncomfortable using his or her chain of command.

- II. **POLICY:** KRHA is resolved to meet this stated purpose and will maintain and operate a Corporate Compliance Helpline 24/7 to allow for the reporting of concerns without fear of reprisal or retribution.

III. **RESPONSIBILITIES:**

1. The Chief Compliance Officer has the overall responsibility for maintaining the operation and integrity of the Helpline of each entity. The Chief Compliance Officer will:
 - Ensure that the Helpline is functional
 - Coordinate investigations of reported violations and/or concerns
 - Provide feedback to callers as requested
 - Report Helpline activity to their Board of Directors on a regular basis
 - Document Helpline activity

IV. PROCEDURE:

1. Operation of the KRHA Helpline (621-9870)

The Corporate Compliance Helpline is a voicemail system that is available to all workforce members and contractors 24 hours a day, 7 days a week. Caller ID is not active on either line, permitting the caller to remain anonymous if desired. The Compliance Officer (or designee, in the event of an extended absence) will manage and respond to Helpline calls. A caller may also speak directly to, mail, e-mail, or visit the appropriate compliance officer to discuss a concern directly.

The Compliance Officer or designee will:

- Summarize callers' concerns and communicate them to the appropriate individual(s) for resolution.
- Maintain a log or file that documents all calls: assign a case number, date/time, location of function/service or program concern, result of investigation and feedback to callers.

2. Confidentiality

- a. Callers will not be required to disclose identity.
- b. If disclosure is made, all reasonable steps will be taken to protect the caller's identity.
- c. Only persons with a bona fide "need to know" will be informed of a caller's identity.

3. Promise of Non-Retaliation for Helpline report as stated in KRHA's Code of Ethical Conduct

- a. It is a violation of the Kennebec Region Health Alliance Code of Ethical Conduct and applicable laws to retaliate or take action against anyone making a good faith report of a concern or potential compliance violation.

4. Investigation and Reporting Mechanisms

- a. A complaint will only be discussed with individuals selected by the Chief Compliance Officer. They may include outside legal counsel or other professionals as necessary and appropriate to investigate the concern.

If a complaint suggests medical practice concerns, these will be summarized for distribution to the Chief Medical Officer.

- b. Sexual harassment, discrimination, compensation or other employment related complaints will be referred to Human Resources.

5. Methods For Investigating and Resolving Complaints

- a. Once the complaint has been reviewed and referred to a key individual(s), the investigation will commence in an attempt to resolve the concern.
- b. In some cases, communication with the individual reporting the concern may be required. The Compliance Officer will act as the intermediary with the caller where contact information was provided. If the individual has expressed a desire for complete anonymity, the investigation will continue with information available.
- c. The results of the investigation will be reported to the individual reporting when appropriate.
- c. The results of investigations will be presented to the Board, CEO, and committees as necessary.

6. Employee Training

Authorized users of the Helpline include all members of the Kennebec Region Health Alliance workforce, including employees, physicians, executive staff, Board of Directors, contractors, volunteers, and vendors.

KRHA will provide detailed, ongoing training to all new employees during orientation and to all employees as needed.

Training will include:

- how to access the Helpline
- the type of concerns addressed
- discussion of confidentiality
- review of non-retaliation policy
- Helpline availability and how to reach the Chief Compliance Officer
- how complaints are investigated and resolved

7. Publicity: The Helpline telephone number will be regularly published online or in printed media throughout the KRHA System.

V. POLICY STORED AT:

- Original approved Kennebec Region Health Alliance Policies are maintained in Administration.
- Entities of KRHA maintain and file policies specific to their areas in a designated Administrative area of their own.

VI. POLICY APPLIES TO:

Kennebec Region Health Alliance

- VII. PROPONENT: Chapter Leader, Compliance Officer
- VIII. KEY SEARCH WORDS: Corporate, Compliance, Helpline
- IX. Citations/Best Practice References: N/A
- X. Policy Attachments: (No Attachments)