

Compliance Policy, Guidelines & Procedures



Division: All HealthCare Partners Entities	Department Policy Owner: Compliance Department
Title: Compliance Hotline Policy	
Effective Date: February 2014	Issue Date: February 2014
	Revision Date: August 2014
Policy Number: HCP-TQ-05	Page: 1 of 5

Purpose	To establish a confidential avenue for teammates and other Interested Parties to report suspected violations of compliance policies, laws and regulations, and/or unethical behavior.
Definitions	<ul style="list-style-type: none"> • Good Faith: Truthful, and without malice or ill intent. Reporters who file a Good Faith complaint believe that a violation has occurred based on observation, reasonable inquiry, or facts. • Interested Party: Any person or entity who has established or wishes to establish a relationship or arrangement, written or unwritten, with HealthCare Partners, its subsidiaries and/or related entities, and includes but is not limited to contracted physicians, contracted providers such as hospitals or other ancillary providers, patients, patients' family members/friends, vendors, and suppliers. • Non-Retaliation Policy: HealthCare Partners' policy that there will be no Retaliation against any person who reports a problem or concern, initiates a complaint, or participates in an investigation of an issue • Reporter: Person who reports suspected violations of compliance policies, laws and regulations, and/or unethical behavior. • Retaliation: Adverse action such as intimidation, threats, coercion, discrimination, termination, demotion, salary reduction, job or shift reassignment, or discipline taken against an individual.
Policy	<ol style="list-style-type: none"> 1. HealthCare Partners maintains a Compliance Hotline for reporting suspected non-compliance in a manner that preserves confidentiality to the extent allowed by law, which assures non-retaliation to the Reporter. 2. The Compliance Hotline is a confidential avenue to report any violations of laws, regulations, the HealthCare Partners' Code of Conduct, Policies and Procedures, or report any other compliance-related concern an individual may have. Examples of reasons to call the Compliance Hotline might be issues or questions related to: <ol style="list-style-type: none"> a. Company policy, law, or regulations; b. Medicare / Medicaid fraud or abuse; c. HIPAA Privacy or Security; d. Patient care or Patient rights;

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- e. Falsification of medical records;
 - f. Retaliation, harassment, or discrimination;
 - g. Conflicts, inappropriate gifts and donations;
 - h. Misuse of company resources, theft, or fraud;
 - i. Health, safety, and environmental issues; or
 - j. Inappropriate accounting practices / Accounting and financial auditing fraud;
3. The Compliance Hotline is available 24 hours a day, 365 days a year.
4. To ensure anonymity, HealthCare Partners' Compliance Hotline is outsourced to a third party entity with trained personnel.
- a. If the Reporter requests anonymity, no attempt will be made to identify the Reporter.
 - b. Information provided by the Reporter will be treated as confidential and privileged to the extent permitted by applicable law.
5. All HealthCare Partners teammates have an obligation to report suspected legal or ethical concerns to afford HealthCare Partners the opportunity to investigate and take corrective action if necessary. Such concerns must be reported in accordance with the *Responsibility to Report Violations Policy* (available on the Team Quest website on MyHCP). The Compliance Hotline is one of many mechanisms teammates may utilize to fulfill their reporting obligations.
6. All reports filed through the Compliance Hotline will be accepted and reported to the Compliance Department (Team Quest).
- a. Compliance-related issues will be investigated by Team Quest.
 - b. Other reported issues will be forwarded to applicable departments.
7. Reporters, who report suspected violations of laws, regulations, or policies in Good Faith, will be protected from any form of Retaliation or retribution in accordance with HealthCare Partners' *Non-Retaliation for Reporting Compliance Violations* policy. Teammates found to have retaliated against another teammate will be disciplined up to, and including, termination of employment.
8. Teammates who have been granted access to Compliance Hotline reports in order to investigate a matter, or manage the Hotline process in general, are expected to act with utmost discretion and integrity in assuring that information received is acted upon in a reasonable and proper manner.

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	<p>9. Self-reporting is encouraged, however teammates may not be exempt from disciplinary actions for reporting their own misconduct. Self-reporting may be taken into account in determining appropriate disciplinary action.</p> <p>10. Teammates who intentionally and maliciously use the Compliance Hotline to make false reports will be subject to disciplinary action.</p>
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Responsible Party	Procedures
All Reporters	<ol style="list-style-type: none"> 1. The Compliance Hotline can be accessed in two (2) ways: <ol style="list-style-type: none"> a. Phone: 1-855-236-1448; or b. Web Portal: www.healthcarepartners.ethicspoint.com. 2. Reporters should provide as much detail as possible to ensure a thorough investigation. 3. Reporters are provided a report number and PIN number when they complete their Compliance Hotline Report. The report and PIN number allows Reporters to: <ol style="list-style-type: none"> a. Provide any additional information to the original Compliance Hotline report by augmenting the original report either via the phone line or web portal; b. Communicate, through the Hotline Administrator (contracted third party entity), with the Lead Case Investigator concerning the original report; and c. Obtain updates on the status of their report; d. Review the outcome of their report, but are not the details of the investigation.
Team Quest	<ol style="list-style-type: none"> 1. All Compliance Hotline reports are forwarded to Team Quest for review, evaluation, and assignment. 2. The Compliance Hotline report is closed when the investigation is concluded and a disposition determined. 3. All Compliance Hotline reports are reviewed monthly by Team Quest's Compliance Director, and quarterly by the Vice President of Compliance.

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Teammates are expected to report possible violations of this policy and procedure. You may make your report to your supervisor, to the Compliance Hotline (1-855-236-1448 or www.healthcarepartners.ethicspoint.com) or to Team Quest. HealthCare Partners has a Non-Retaliation policy and will not tolerate any form of retaliation against anyone who files a Compliance report in good faith. Reports can be made anonymously or you may request confidentiality. Questions regarding this policy should be directed to Team Quest at CorporateCompliance@healthcarepartners.com.

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