



## **TITLE: COMPLIANCE REPORTING OF COMPLIANCE QUESTIONS OR CONCERNS AND ORGANIZATIONAL RESPONSE**

### **PURPOSE:**

As part of its Corporate Compliance Program, Western Connecticut Health Network ("WCHN") has developed a reporting system where employees and other interested individuals can pose compliance-related questions and/or report suspected "non-compliance" by others within the organization.

### **POLICY:**

All employees and other interested individuals are required to report instances of suspected "non-compliance" or pose questions when a regulation or policy is unclear. Reports can be made anonymously without fear of retribution or adverse consequences. All reasonable attempts in an effort to maintain confidentiality will be made. Non-compliance is defined as failure to follow applicable federal, state or municipal laws, requirements of federal and state health programs such as Medicare and Medicaid, or WCHN policies and procedures.

### **PROCEDURE:**

#### **Reporting**

All employees and other interested individuals are encouraged to ask questions or report all instances of perceived non-compliance. Reports should only be made in good faith when there is a legitimate question or concern about a potential compliance issue.

WCHN will respond in a timely manner to questions received and/or reports made. The Corporate Compliance Officer will retain records and reports from any compliance investigations in confidence. While WCHN will do its best to maintain this confidentiality, the investigation may require disclosure of the reporting person.

All employees and other interested individuals have available to them the following reporting options:

- Discuss the question or concern with your supervisor or Human Resources representative;
- Call the Chief Audit, Compliance & Privacy Officer at (203) 739-7110;
- Call the Compliance Help Line directly at (844) 650-1212; or
- Complete a written "Compliance Reporting Form". This form can be obtained from the Administrative Manual. The completed "Compliance Reporting Form" should be forwarded to the Compliance Officer.

If the individual asking the question or making the report identifies him/herself, the Corporate Compliance Officer or a designee will acknowledge receipt of the information within five (5) business days. In addition, every 30 days feedback will be provided regarding the status of pending investigations.

### **Response**

Once a report or question has been received, the Corporate Compliance Officer, along with relevant Department Managers and/or members of the Executive Compliance Committee will review the available evidence and undertake appropriate investigations.

Throughout the investigation, the Corporate Compliance Officer will periodically contact the individual who made the report, if that person's identity is known, to provide an update on the status of the investigation and an expected completion date.

If the investigation reveals that the activity reported necessitates disciplinary action, the discipline process will proceed per WCHN policy.

The Corporate Compliance Officer, along with relevant Department Managers and/or members of the Executive Compliance Committee, is responsible for evaluating training and education needs and ongoing monitoring activities to prevent any reoccurrence. This may include development and implementation of a corrective action plan. Refer to the WCHN policy and procedure on *Corrective Actions*.

If the identity of the individual making the report is known, the individual will be notified that an investigation has been completed and WCHN has taken appropriate action.

**ORIGINATOR**  
**DATE OF INCEPTION**  
**REVISION DATE**  
**SCHEDULED REVISION DATE**  
**LATEST REVIEW DATE**  
**APPROVED BY**

**CORPORATE COMPLIANCE**  
**3/22/01**  
**6/02, 9/07, 12/11, 02/15, 07/15**  
**12/18**  
**9/27/2018**  
**EXECUTIVE LEADER**