

Policies and Procedures: Compliance Hotline Operation

Section: Compliance
Chapter: Administration
Policy: Compliance Hotline Operation

I. PURPOSE

To establish a policy regarding the operation of the WVUPC compliance hotline.

II. APPLICABILITY

This policy applies to all WVUPC employees and to all individuals/entities entering into contracts to do business with WVUPC.

III. POLICY

WVUPC is committed to the timely identification and resolution of all compliance related issues that may adversely affect employees, patients or the organization. Therefore, WVUPC has established communication channels for the reporting of problems and concerns either directly to the Compliance Officer or, on an anonymous basis if desired, via a compliance hotline. The hotline is intended to provide an avenue for employees or interested parties to report suspected violations of federal health care program requirements, suspected criminal activity, or any form of illegal or unethical conduct within WVUPC operations.

IV. PROCEDURE

1. WVUPC shall maintain a dedicated compliance hotline that employees and other interested persons may use to report problems and/or concerns of a compliance related nature. The hotline may be accessed in the Charleston, West Virginia, area at (304) 556-3807, and/or toll free at (800) 566-1483.
2. Hotline numbers will be provided to all attendees as part of the corporation's general compliance training, and will also be posted throughout the organization in a readily visible location.
3. Compliance hotline reporting may be made anonymously if preferred by the reporting individual.
4. Individuals who have, in good faith, reported compliance concerns or complaints via the hotline or otherwise may not be subjected to any form of retaliation or retribution for such reporting.
5. Hotline reports shall be received and addressed by the Director of Corporate Compliance and Regulatory Affairs who is responsible for checking the

Compliance Hotline on a regular basis, for keeping a log of calls received, and for performing an initial investigation of any compliance related concern or complaint reported via the Hotline.

6. The Director of Corporate Compliance and Regulatory Affairs shall ensure that all hotline calls are addressed and responded to in an appropriate and timely manner in accordance with the WVUPC Compliance Plan, consulting whenever necessary with corporate general counsel and the WVUPC Corporate Compliance Committee.
7. Whenever callers to the Compliance Hotline disclose their identity, such identity shall be held in confidence whenever requested, to the extent possible under applicable law.
8. The Director of Corporate Compliance and Regulatory Affairs will report periodically to the Corporate Compliance Committee and the Board of Directors regarding hotline activity. This report will include the total number of calls received, reviewed and responded to.

V. Amendment or Termination of this Policy

This policy may be amended or terminated at any time.

VI. References

- WVUPC Corporate Integrity Agreement, p. 12.