
Subject	Compliance Hotline
Index Number	GB-3000
Section	Compliance
Subsection	General
Category	Corporate
Contact	Peter Weidenheim
Last Revised	8/21/2019

References

Not Applicable.

Applicable To

All employees of Memorial Hospital of Boscobel d/b/a Gundersen Boscobel Area Hospital & Clinics a Gundersen Health System affiliate hereafter referred to as "Gundersen Boscobel".

Detail

To provide guidance on how to report a compliance issue through the compliance hotline.

1. Consistent with applicable federal guidelines, Gundersen Boscobel utilizes a Compliance Hotline to facilitate efforts by employees, patients and members of the community to report actual or potential compliance violations. The purpose of this policy is:
 - a. To help prevent, detect, investigate, and correct practices which fail to comply with (a) Gundersen Boscobel 's Compliance Plan and Standards of Conduct, or (b) applicable federal, state or private payor requirements.
 - b. To comply with requirements established by the United States Department of Health and Human Services, Office of Inspector General (OIG), relating to the posting of Gundersen Boscobel's/Gundersen Health System's Compliance Hotline number.
 - c. To establish a procedure for logging Compliance Hotline telephone calls and electronic e-mails including steps taken to investigate and address actual or potential compliance violations reported by employees and patients.
 - d. To provide an anonymous means for employees, patients and members of the community to use for reporting actual or potential compliance problems.
 - e. To ensure the integrity of Gundersen Boscobel 's Compliance Plan and Standards of Conduct by ensuring that all communications to the Compliance Hotline are handled professionally and in accordance with guidelines established by herein.
2. Persons who become aware of violations of Gundersen Boscobel 's Compliance Plan and Standards of Conduct are required to report them to their supervisor, the Gundersen Vice President, Compliance, the General Counsel, the Medical Director of Compliance, the Director of

Compliance/Compliance Officer – Gundersen Regional Hospital Affiliates, or another member of the Compliance Program staff.

3. Alternatively, such concerns may be communicated by telephone or e-mail on an anonymous basis to the Gundersen Health System Compliance Hotline:

Phone Number.....(608) 784-0477

Toll-Free Number.....(877) 532-8879

Gladiator (Gundersen’s intranet), access the Compliance Hotline link, under the Regulatory Section.

4. All communications concerning actual or potential violations of Gundersen Boscobel 's Compliance Plan and Standards of Conduct shall be kept strictly confidential to the fullest extent possible, consistent with any reporting requirements or other obligations or needs of Gundersen Boscobel.
5. No retaliatory action will be taken or will be allowed by Gundersen Boscobel against any employee, patient or member of the community who reports any actual or suspected violations of Gundersen Boscobel 's Compliance Plan and Standards of Conduct. Any such retaliation shall, itself, be treated as a violation of Gundersen Boscobel's Compliance Plan and Standards of Conduct, and should be reported immediately.
6. Once reported to the Compliance Program staff or to the Compliance Hotline, the issue or concern shall be reviewed and commencement of any applicable investigation shall begin within 24-48 hours.
7. The Director of Compliance/Compliance Officer shall present periodic reports to Gundersen Boscobel's Compliance Operations Committee:
 - a. The subject matter of telephone calls received through use of the Compliance Hotline, including issues that require follow-up by the Director of Compliance/ Compliance Officer.
 - b. The steps taken to investigate and address actual and potential compliance problems reported using the Compliance Hotline.

Implementation

Compliance Hotline E-mail:

Gladiator (Gundersen’s intranet), access the Compliance Hotline link, under the Regulatory Section.

Compliance Hotline Telephone Numbers:

Compliance Hotline Toll-Free Number.....(877) 532-8879

Compliance Hotline Number.....(608) 784-0477

Contact Information:

Dan Lilly, General Counsel..... (608) 775-4615
Kari Adank, Gundersen Vice President, Compliance..... (608) 775-8025
Peter Weidenheim, Director of Compliance/Compliance Officer..... (715)-538-1784
Gundersen Regional Hospital Affiliates

Compliance Hotline Telephone Calls During Regular Business Hours:

The Compliance Hotline Telephone will be monitored and answered between 8:00 a.m. and 5:00 p.m. by the Gundersen Vice President, Compliance and other Compliance Program staff. Voice mail will be available and, if possible, telephone calls will be returned the same day.

Compliance Hotline Telephone Calls After Regular Business Hours:

Callers will be asked to leave confidential voice mail messages concerning actual or potential compliance violations. The voice mail system will be checked each regular business day for voice mail messages. If a caller leaves a contact number, the Director of Compliance/Compliance Officer or other Compliance Program staff will attempt to contact the caller within 24 hours after the call is received.

Voice Mail Messages:

The voice mail message for the Compliance Hotline will include substantially the following message:

"You have reached the Gundersen Health System Compliance Hotline. Our regular business hours are Monday through Friday from 8:00 a.m. to 5:00 p.m. The Compliance Hotline is designed to provide a confidential reporting system for our employees, patients and members of the community. We are unable to take your call at this time, but we encourage you to leave a detailed message so that your concerns may be addressed. We will return your call as soon as possible. Each concern will be investigated and you may follow-up on the progress of the investigation using the Compliance Hotline. If you would prefer not to leave your name, please leave a detailed message with a randomly selected four digit number. This four digit number can be used to track your complaint if you chose to follow up on your concerns."

Intake Process:

The following information should be obtained using the Intake Worksheet:

- a. Assign a file number to each call. The caller will be given a file number to use to obtain information regarding the investigation.
- b. The date of the call and the Compliance Program Representative taking the call.
- c. The name of the caller and the caller's telephone number (unless anonymous).
- d. The name of the Gundersen Boscobel facility or department involved.
- e. Detailed information concerning the suspected violation.
- f. A request for documentation that supports the caller's belief that there is an actual or potential compliance problem.
- g. Requested follow-up from the caller.
- h. Instructions given to the caller.
- i. The preliminary plan for reviewing the actual or potential compliance problem, including the person assigned to investigate.
- j. The results of the investigation.
- k. The date the investigation was completed.

Compliance Hotline Telephone Log:

An entry will be made in the Compliance Hotline Telephone Log for each telephone call received. The following information should to be documented using the Compliance Hotline Telephone Log or a computer software program that includes substantially the same information:

- a. Date
- b. Time
- c. Caller's name or anonymous identification number
- d. Brief description of issue
- e. Person assigned to investigate
- f. Brief description of outcome

Reference:

Gundersen Boscobel *Compliance Plan and Standards of Conduct*, effective October 22, 2013 and as may subsequently be updated.