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**Subject:** Compliance Hotline  
**Index Number:** HARCO-3000  
**Section:** Compliance and Ethics  
**Subsection:** Corporate  
**Category:** General  
**Contact:** Compliance Officer  
**Last Revised:** 9.10.18

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**References:**

Not applicable

**Applicable To:**

This policy is applicable to all employees, consultants, residents, families of residents, community members of Gundersen Harmony Care Center.

**Detail:**

Consistent with applicable federal guidelines, Gundersen Harmony Care Center (GHCC) has established a Compliance Hotline to facilitate efforts by employees, residents and members of the community to report actual or potential compliance violations. The Compliance Hotline is the same Compliance Hotline established and maintained by GHCC's affiliate, Gundersen Health System.

The purpose of this policy is:

- To help prevent, detect investigate and correct practices which fail to comply with (a) Gundersen Harmony Care Center's Compliance Plan and Standards of Conduct, or (b) Gundersen Health System's compliance Plan and Standards of Conduct, or (c) applicable federal, state or private payer requirements.
- To comply with requirements established by United States Department of Health and Human Services, Office of Inspector General (OIG), relating to the posting of Gundersen Harmony Care Center/Gundersen Health System's Compliance Hotline number.
- To establish a procedure for logging Compliance Hotline telephone calls including steps taken to investigate and address actual or potential compliance violations reported by employees and residents.
- To provide an anonymous means for employees, residents and members of the community to use for reporting actual or potential compliance problems.
- To ensure the integrity of Gundersen Harmony Care Center'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.

**Implementation:**

Persons who become aware of violations of Gundersen Harmony Care Center's Compliance Plan and Standards of Conduct are encouraged to report them to their supervisor, the Administrator who is the Compliance officer or any other member of the Compliance Program staff. Alternatively, such concerns may be communicated by telephone or e-mail on an anonymous basis to the Gundersen Health System's Compliance Hotline:

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

All communications concerning actual or potential violations of Gundersen Harmony Care Center'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 Harmony Care Center's.

No retaliatory action will be taken or will be allowed by Gundersen Harmony Care Center or Gundersen Health System's against any employee, resident or member of the community who reports any actual or suspected violations of Gundersen Harmony Care Center Compliance Plan and Standards of Conduct. Any such retaliation shall, itself, be treated as a violation of Gundersen Harmony Care Center's Compliance Plan and Standards of Conduct, and should be reported immediately.

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.

The Administrator/ Compliance Officer shall present periodic reports to Gundersen Harmony Care Center's Compliance Oversight Committee:

- The subject matter of telephone calls received through use of the Compliance Hotline, including issues that require follow-up by the Administrator/ Compliance Officer.
- The steps taken to investigate and address actual and potential compliance problems reported using the Compliance Hotline.

**Contact Information:**

Michelle Borreson, Administrator/ Compliance Officer                      507-886-6544 Ext. 73431  
Kari Adank, Chief Compliance Officer, Gundersen Health System 800-362-9567 Ext.58025

**Compliance Hotline Telephone Calls During Business Hours:**

The Compliance Hotline Telephone will be monitored and answered between 8:00 a.m. and 5:00 p.m. by the Gundersen Health System's Compliance program staff. Voice mail will be available and, if possible, telephone call 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 Gundersen Health System's

Compliance program staff will attempt to contact the caller within 24 hours after the call is received.

**Intake Process:**

See GL-3000 for information regarding Gundersen Health System's Intake Process.

**Compliance Hotline Telephone Log:**

See GL-3000 for information regarding Gundersen Health System's Compliance Hotline Telephone Log.

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