
Subject	Compliance Hotline
Index Number	GL-3000
Section	Compliance and Ethics
Subsection	General
Category	Corporate
Contact	Adank, Kari
Last Revised	3/7/2016

References

Not Applicable.

Applicable To

All employees of Gundersen Lutheran Health System, Inc. and its affiliates including Gundersen Clinic, Ltd., Gundersen Lutheran Medical Center, Inc. and Gundersen Lutheran Administrative Services, Inc. (collectively "Gundersen").

Detail

Consistent with applicable federal guidelines, Gundersen has established 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'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'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'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.

Persons who become aware of violations of Gundersen's Compliance Plan and Standards of Conduct are obligated to report them to their supervisor, the Chief Compliance Officer, the General Counsel, the Medical Director of Compliance, the Director of Compliance or another member of the Compliance Program staff.

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

Local Phone Number (608) 784-0477

Toll-Free Number (877) 532-8879

E-Mail: Gladiator (Gundersen's Intranet), access the "on-line forms" link, then "Compliance Program"

All communications concerning actual or potential violations of Gundersen'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.

No retaliatory action will be taken or will be allowed by Gundersen against any employee, patient or member of the community who reports any actual or suspected violations of Gundersen's Compliance Plan and Standards of Conduct. Any such retaliation shall, itself, be treated as a violation of Gundersen'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 Chief Compliance Officer shall present periodic reports to Gundersen's Compliance Oversight Committee:

1. The subject matter of telephone calls received through use of the Compliance Hotline, including issues that require follow-up by the Chief Compliance Officer.
2. 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 "on-line forms" link, then "Compliance Program"

Compliance Hotline Telephone Numbers:

Compliance Hotline Number (877) 532-8879

Compliance Hotline Local Number (608) 784-0477

Contact Information:

Kari Adank, Chief Compliance Officer, Ext. 58025

Dan Lilly, General Counsel, Ext. 54615

Taryn Zubich, Director of Compliance, Ext. 51510

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 Chief Compliance Officer, Director of 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 Chief Compliance Officer, the Director of Compliance or another 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 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:

1. Assign a file number to each call. The caller will be given a file number to use to obtain information regarding the investigation.
2. The date of the call and the Compliance Program Representative taking the call.
3. The name of the caller and the caller's telephone number (unless anonymous).
4. The name of the Gundersen facility or department involved.
5. Detailed information concerning the suspected violation.
6. A request for documentation that supports the caller's belief that there is an actual or potential compliance problem.
7. Requested follow-up from the caller.
8. Instructions given to the caller.
9. The preliminary plan for reviewing the actual or potential compliance problem, including the person assigned to investigate.
10. The results of the investigation.
11. The date the investigation was completed.

Compliance Hotline Log:

An entry will be made in the Compliance Database for each report received. The following information should to be documented:

1. Date
2. Time
3. Caller's name or anonymous identification number
4. Brief description of issue
5. Person assigned to investigate
6. Brief description of outcome

Reference:

Compliance Plan and Standards of Conduct, effective January 1, 1999.