

HCCA Compliance 101, 4th Edition

APPENDIX G | Sample Compliance Line Information

Compliance Alertline Report

Date Received	Priority Level	Location	Caller ID	Issue: General Summary	Referral for Action	Action/Follow-up Taken	Closed Date	Financial Repayment	Operating Unit	Senior Ops Manager

Sample Compliance Line Facts

Company ABC COMPLIANCE LINE FACTS

Q. How may Company ABC employees report violations of law or Company ABC policy?

A. All employees are required to promptly report all known or suspected violations of law or ABC policy.

Employees may report violations to:

- Supervisor
- Manager
- Director
- Senior Leadership
- Director of Corporate Compliance
- Chief Compliance Officer (General Counsel)
- Company ABC Compliance Line

Management will assist you in reporting violations and facilitate getting you appropriate advice.

Q. What is the Company ABC Compliance Line?

A. The COMPANY ABC Compliance Line is a “hotline.” It is a toll-free number (1-XXX-XXX-XXXX) at which you may report in a convenient and confidential way violations of law or COMPANY ABC policy. In order to provide

excellent service, the COMPANY ABC Compliance Line is available 24 hours a day, 365 days a year.

Q.What types of concerns should be reported to COMPANY ABC Compliance Line?

A. Call COMPANY ABC Compliance Line to express concerns or report suspected violations related to:

- Bribes and Kickbacks
- Medicare/Medicaid Fraud and Abuse
- Conflicts of Interest
- Fraudulent Billing
- Privacy of Employee and Patient Records
- Confidentiality of COMPANY ABC Information
- Alteration or Destruction of COMPANY ABC Records or Financial Documents
- Potential Criminal Violations
- EMTALA (Emergency Medical Treatment Active Labor Act)
- Other Violations of law or COMPANY ABC Policy

Q.What concerns should not be referred to the COMPANY ABC Compliance Line?

A. Compliance Line is NOT to be used to report an immediate threat to person, property or environment. These conditions must immediately be reported as outlined in COMPANY ABC safety policies and procedures.

Q.Do I have to provide my name?

A. No. You may give your name if you desire, but it is not required. There are no recorders on the telephone lines or any devices that can identify or trace the number from which you are calling. COMPANY ABC is interested in resolving your concerns, not identifying the person reporting the issue.

Q.How does COMPANY ABC Compliance Line work?

A. The call will go to a contracted third party where one of its trained Communications Specialists will answer your call. The Communications Specialist will first ask how he or she can be of service. After you identify the reason for your call, detailed information will be gathered by the Communications Specialist to fully understand the purpose of your call and your concern. Reporting callers will be given a case number and an agreed upon time when the reporter may call back. A confidential and/or anonymous report will be prepared by the Communications Specialists and forwarded to the COMPANY ABC Compliance office. A staff member will initiate an appropriate review. In cases where you have chosen anonymity, the COMPANY ABC Compliance Line will be notified of the results of the review in order to respond to you by the agreed upon follow-up date.

Q.Are callers limited in the number of times they can report?

A. No. You may call as often as you wish to report information.

Q.Will there be a review process after each report is made?

A. Each report is taken seriously. Whether there is a review depends on a number of factors including the information provided, the details, documentation, if any, and COMPANY ABC policy.

Q. *What legal protection is afforded me when I call the COMPANY ABC Compliance Line?*

A. Under law and our own policy, COMPANY ABC is not allowed to make reprisals against employees who furnish good faith reports of inappropriate activities.

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