

ADMINISTRATIVE POLICY #: SUBJECT: EFFECTIVE DATE: REVISION FREQUENCY: TOTAL PAGES:	1503.00 Compliance Hotline January 1, 1999 ANNUAL 5
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I. POLICY

Health Network Laboratories (HNL) has established a policy regarding ethical behavior. In support of its policy to adhere to a Code of Ethical Behavior, HNL will provide all HNL employees and interested parties (such as: providers, vendors, contractors, former employees, etc.) with the information and tools necessary to conduct their operations in compliance with all laws, regulations, policies and procedures and accreditation standards governing its diverse operations. We are further committed to the policy that all staff members and professionals have an obligation to report any inappropriate or potentially illegal conduct. In order to facilitate the clear and timely delivery of information, HNL will contract with a Hotline company. The toll free Hotline number, **1-877-895-2905**, is to be used by employees and interested parties for reporting (anonymously if desired) potential or perceived violations of law, regulation, violations of contractual obligations, violations of policies or procedures or the Code of Ethical Behavior. The Hotline will be promoted in internal publications, in all compliance training sessions, and by other appropriate means.

The Hotline hours of operation are twenty four (24) hours a day, seven (7) days a week. Confidentiality, if elected by the caller, will be respected.

Health Network Laboratories is accredited by the College of American Pathologists (CAP). If employees have concerns regarding quality patient testing or laboratory employees' safety, CAP has a dedicated toll free number: 1-866-236-7212.

As with all operational matters, employees and interested parties are expected to discuss their concerns within the organizational structure (departmental to senior levels) and/or Compliance Officer. Utilization of the Hotline should be freely taken, but its use should be limited to those situations when other avenues are perceived to be ineffective.

II. SCOPE

Employees of HNL and interested parties (such as: providers, vendors, contractors, former employees, etc.).

III. DEFINITIONS

Hotline – A telephone line for employees or interested parties to report suspected criminal activity, illegal or unethical conduct occurring within the corporation in the event other resolution channels have been ineffective. The Hotline will be operated by an external firm that is experienced in the operation of Compliance Hotline services.

Corporate Compliance Officer (CCO) – Individual responsible for development, implementation, and administration of the day to day activities necessary to provide a comprehensive, effective, and efficient program which enables HNL to maintain compliance with all licensing and accrediting bodies and with laws and regulations.

Lehigh Valley Hospital and Health Network (LVHNN) Hotline Service – Contracted vendor who provides services (currently National Hotline Services, Inc.)

IV. PROCEDURE**A. Reporting**

1. If employees or interested parties become aware of any potential violations of law, regulation, policy, procedure, accreditation standards, or licensing requirements, the information should be reported immediately to the direct supervisor.
2. If employees or interested parties are uncomfortable for any reason bringing the matter to the attention of a direct supervisor, the information should be reported within the organizational structure, departmental to senior level, and/or Compliance Officer. In the event these avenues are ineffective or are perceived to have produced unsatisfactory results, the information should be reported through the Hotline - (1-877-895-2905). Issues regarding quality and/or safety should be reported to CAP at 1-866-236-7212.
3. When calling the Hotline, the caller is not required to disclose their identity. Anonymity is assured. Should any caller choose to disclose their identity, it will be held in confidence to the fullest extent practical or allowed by law.
4. All information received by the Hotline will be referred to the Health Network Laboratories' Compliance Officer for prompt investigation and corrective action, when appropriate. The Compliance officer will have authority to access all internal resources or external advisors to complete an investigation.
5. No retribution nor retaliatory actions will be taken against any caller for reporting suspected violations. Following investigation of any HNL employee or interested party who is found to have made an intentionally false statement or otherwise misuses the Hotline shall be subject to discipline using applicable disciplinary policies and procedures.
6. Callers who wish to remain anonymous will be provided with the information necessary to facilitate any follow-up phone calls that need to occur.
7. Callers will be notified that actions taken relative to their call may not become known within the organization. Therefore, it may not be apparent to the caller that action has been taken. Also, the status of any actions may not be available to the caller.

B. Follow-Up

1. Detailed documentation of the Hotline call will be forwarded to the LVHHN Compliance Officer by the hotline service via the Hotline Report Form.
2. The Hotline Report Form will be sequentially numbered according to date and time.

3. Hotline Report Forms will be forwarded to the HNL CCO and maintained by the Compliance officer for 7 years and then destroyed unless an ongoing investigation or follow-up necessitates their retention.
4. A Hotline Summary Report will be generated by the Compliance Officer to track the Hotline activity. This report will include: record number, date received, type of call, subject of call, a brief description, status, and action taken.
5. The Compliance Officer is responsible for evaluating all issues raised by a Hotline caller and determining the appropriate follow-up course of action.
6. The Compliance Officer, along with the Compliance Steering Committee and/or legal counsel, shall conduct an investigation of conduct that does not conform to federal and state law, and federal, state and private payer health care program requirements, as well as the organization's ethical and business policies.
7. Immediate and appropriate corrective action in accordance with applicable disciplinary policies and procedures, up to and including termination from employment or association with HNL will be taken if conduct is proven to involve misconduct.
8. The Compliance Officer will update the Hotline Summary Report Form and file to include resolution.
9. If appropriate or applicable to the circumstances, the Compliance Officer will follow-up with the Caller to advise as to the resolution of the case.
10. Call related to laboratory quality, performance or accreditation will be referred through the Performance Improvement Process for investigation and resolution.
11. As part of the periodic Compliance Report to the HNL Board and its' Audit Committee, Hotline calls including their follow-up investigation and corrective action, when applicable will be reported.
12. Calls made to the CAP hotline will be coordinated by CAP with documentation of the complaint sent to the HNL Lab Director.
13. Complaints will be fully investigated through the HNL Quality Management Committee with written response sent back to CAP

V. ATTACHMENTS

N/A

VI. REFERENCES

1. The Office of inspector General's Compliance Program Guidance for Hospitals, Laboratories, and Home Health Agencies.
2. Code of Ethical Behavior (AD#1202.00)
3. Employee Counseling and Discipline (HR #2000.40).

VII. DISTRIBUTION

HNL Intranet Administrative Policy Manual

VIII. APPROVAL

This policy was reviewed by **BETH ROKUS** on **October 2008**.

IX. POLICY RESPONSIBILITY

Compliance Officer

X. IN COORDINATION WITH:

LVHHN Compliance Steering Committee
HNL Laboratory Director

XI. DISCLAIMER STATEMENT

This policy and the implementing procedures are intended to provide a description of recommended courses of action to comply with statutory or regulatory requirements and/or operational standards. It is recognized that there may be specific circumstances, not contemplated by laws or regulatory requirements that make compliance inappropriate. For advice in these circumstances, the policy sponsor should consult with Legal Services.

XII. REVISIONS

January 2002
February 2005
March 2008
October 2008

HNL reserves the right unilaterally to revise, modify, review, rescind or alter the terms and conditions of this policy within the constraints of the law, by giving reasonable notice.