



# Policy & Procedure

## CORPORATE COMPLIANCE PROGRAM HOTLINE

**FUNCTION**

Administration

**NUMBER**

VI.L

**ISSUED**

December 2000

**REVISED**

1/06; 12/13

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### PURPOSE

- The Evangelical Lutheran Good Samaritan Society is committed to the timely identification and resolution of all issues that may adversely affect employees, residents, or the Society itself. Therefore, the Society has established communication channels to report problems and concerns including a Compliance Solutions Hotline (toll-free telephone number). Employees, residents and interested parties are encouraged to report problems or concerns through established channels. The Compliance Solutions Hotline establishes an avenue for employees or interested parties to report suspected criminal activity and illegal or unethical conduct occurring within The Evangelical Lutheran Good Samaritan Society in the event other resolution channels are ineffective or the caller wishes to remain anonymous.

### POLICY

The Evangelical Lutheran Good Samaritan Society will establish and maintain a Compliance Solutions Hotline [(800) 631-6142] that employees may use to report problems and concerns while identifying themselves or anonymously or in confidence. Employees who report problems and concerns in good faith via the Compliance Solutions Hotline will not be subject to any form of retaliation or retribution as a result of such reporting. All those who are employed in the Compliance Solutions Hotline operation are expected to act with utmost discretion and integrity in assuring that information received is acted upon in a reasonable and proper manner.

### PROCEDURE

1. The corporate compliance officer's (CCO's) general responsibilities related to the Compliance Solutions Hotline operation include ensuring that all hotline calls are addressed in an appropriate and timely manner, as well as in accordance with these and all related policies and procedures. Other responsibilities include the following:
  - Ensuring proper functioning of the hotline;
  - Establishing reporting and records maintenance procedures;
  - Conducting appropriate investigations and follow-up;
  - Referring calls when appropriate;
  - Providing feedback to callers when necessary;
  - Reporting hotline activity to the compliance management committee and board executive committee; and
  - Maintaining security for all calls and related documents.
2. The Compliance Solutions Hotline will be staffed with qualified and properly trained personnel during its hours of operation which are 7 a.m. to 7 p.m., CT, Monday through Friday. All callers will be given the opportunity to speak with a live operator and/or the CCO in person.

3. During off hours, all callers to the Compliance Solutions Hotline will hear the same prerecorded message explaining their options, any limitations, the non-retaliation policy and other pertinent information.
4. The CCO will communicate any matter deemed potentially unlawful to legal counsel.
5. All calls will be recorded with appropriate information using a predefined question script. Calls are assigned a sequential incident number for tracking purposes.
6. When a hotline call cannot be resolved while the caller is on the line, follow-up review or investigative actions will be taken. The caller may be asked to call back at an agreed upon date and time in case additional information is needed or if they wish to speak directly to the CCO.
7. Callers will be provided an incident identification number and will be asked to provide a keyword as an added confidentiality measure to allow for anonymous updates on the status of their concern while protecting their anonymity.
8. Calls that do not involve Human Resources concerns or allegations of health program fraud and abuse laws and regulations and/or related Society policies and procedures will be forwarded to the appropriate director of operations (for center-level calls) or director (for National Campus) for follow-up and resolution. A copy of the concern will be forwarded to the vice president for regional operations or system vice president where applicable. Results of subsequent investigations and resolution will be provided to the compliance office for resolution tracking purposes.
9. Calls that involve allegations of health program fraud and abuse will be investigated directly by the CCO with assistance as appropriate from other departments.
10. The Compliance Solutions Hotline operation will involve other departments, as appropriate, for advice or further investigation. Human Resources calls will be referred to the Human Resources Division for investigation and resolution. In the event that the CCO is not, in good faith, satisfied that a matter brought before the investigating or advisory departments was appropriately addressed and resolved, the CCO will be responsible for and is authorized to address the matter with the Society's president and chief executive officer, and where necessary, the board of directors.
11. The CCO will report periodically to the chief legal officer and compliance management committee and the compliance committee regarding hotline activity. This report will include the total number of calls received and general results from the hotline operation.