

REFUAH COMMUNITY HEALTH COLLABORATIVE

(A Program of Refuah Health Center)

Manual Section: Compliance-DSRIP	DSRIP-COMP-02
Subject: Anonymous Reporting	Page: 1 of 2

POLICY: Refuah Community Health Collaborative Performing Provider System (“RCHC”) is committed to the highest possible standards of ethical, moral, and legal business conduct. In conjunction with this commitment and the PPS’s commitment to open communication, the PPS has provided an avenue for all PPS Providers to raise compliance related concerns confidentially and anonymously when normal mechanisms are not appropriate.

It is the responsibility of all PPS Providers to report violations of applicable state and Federal laws and regulations, laws/regulations applicable to the DSRIP Program, RCHC policies, NYSDOH and DSRIP policies and procedures, issues related to misconduct, instances of fraud, waste, or abuse, or violations of RCHC Standards of Conduct. PPS Providers are encouraged to first report any issues through their appropriate chain of command, who then must report it to RCHC’s Chief Compliance Officer. The purpose of the Hotline is to provide PPS Providers with an additional means of reporting such violations. PPS Providers must publicize the Compliance Hotline information in the same way in which they publicize their own compliance program materials, such as on their Intranet, in break rooms, orientation materials, hallways, etc. RCHC will not retaliate for any good faith reporting.

IMPLEMENTATION:

1. RCHC, through Refuah Health Center, has contracted with an independent, private company (“Company”) to provide a confidential and anonymous hotline, known as the Compliance Hotline, for Refuah Community Health Collaborative Performing Provider System.
2. The Compliance Hotline is available 24 hours a day, 7 days a week. Reports can be made in the following ways:
 - **Phone:** USA and Canada: **844-280-0009**
 - All other countries: **800-603-2869** (must use dialing instructions attached in PDF to this policy)
 - **Website:** www.lighthouse-services.com/refuahchc
 - **E-mail:** reports@lighthouse-services.com (must indicate RCHC with report)
 - **Fax:** (215) 689-3885 (must indicate RCHC with report)

3. Reporters to the Compliance Hotline will have the ability to remain anonymous if they choose. Please note that the information provided by you may be the basis of an internal and/or external investigation into the issue you are reporting and your anonymity will be protected to the extent possible by law. Your identity may become known, however, during the course of the investigation because of the information you have provided. Reports are submitted by Company to RCHC or its designee.
4. Reports to the Compliance Hotline will be handled by a trained operator of the Company. The individual making the report (the "Reporter") will be asked a series of questions and to describe the issue in as much detail as possible to assist RCHC in addressing the concern raised. Reporters shall be truthful in reporting allegations or suspected allegations of wrongdoing.
5. A Reporter to the Hotline is not required to disclose his/her identity. All those who contact the Hotline who wish to remain anonymous shall be assured anonymity to the extent allowed by law.
6. While Reporters will be advised that they are not required to disclose their identity, in some circumstances it will not be possible to fully act on a Reporter's complaint or complete a thorough investigation without information that may disclose their identity, or the Reporter's identity may become apparent during the call. In such circumstances, the Reporter's identity will be held in confidence to the fullest extent of the law.
7. When a phone or electronic report is received through the Hotline, the report will be sent from the Company to the appropriate RCHC Department designee, depending on the nature of the concern. The Department shall review and investigate the report.
8. For each report received, a record of each decision made, each action initiated, and the date the investigation was resolved or completed will be kept by the Chief Compliance Officer.
9. The Chief Compliance Officer or his/her designee will report at least quarterly to the Compliance Committee on the operation of the Hotline. This report will include the total number of calls received and the general nature of the calls. Should trends or opportunities for systemic improvements be identified, recommendations will be made to effect change.
10. No disciplinary or retaliatory action shall be taken against any PPS Provider who, in good faith, reports allegations of wrongdoing or who assists in an authorized investigation of alleged wrongdoing.

Responsible Party: Azizza Graziul, Esq., Chief Compliance Officer

Approved: 1/2016

Reviewed: 1/2016, 4/2017

Revised:

This policy and procedure shall be periodically reviewed and updated consistent with the requirements and standards established by the Executive Governing Body and Federal and State law and regulations.