

MAINEGENERAL HEALTH

FUNCTIONAL AREA: Leadership

POLICY #: LD-1

EFFECTIVE: 8/98

REVISED: 4/00, 8/02, 10/04, 10/06

TOPIC: Corporate Compliance Helpline

AUTHORIZATION:

President, MaineGeneral Health

Corporate Compliance Officer

I. PURPOSE:

Open communication is essential to the success of MaineGeneral Health as an organization of integrity. An employee helpline provides a means for employees to report concerns and/or perceived violations of standards of ethical conduct, protocols, policies and procedures, as well as safety or other laws, rules and regulations while maintaining anonymity.

II. POLICY: MGH is resolved to meet this stated purpose and will maintain and operate a Corporate Compliance Helpline to allow for the reporting of concerns without fear of reprisal or retribution.

III. RESPONSIBILITIES:

1. The Corporate Compliance Officer has the overall responsibility for maintaining the operation and integrity of the helpline. Specifically, the Corporate Compliance Officer will:

- Ensure that the helpline is functional
- Coordinate investigations of reported violations and/or concerns
- Provide feedback to callers as requested
- Report Helpline activity to the Board of Directors on a regular basis
- Document Helpline activity

IV. PROCEDURE:

A. **Operation of the Helpline (#621-9350) or (465-3174 for HealthReach)**

1. The Corporate Compliance Helpline is a voicemail system that is available to all workforce members 24 hours a day. Caller ID is not active on this line, permitting the caller to remain anonymous if desired. The Corporate Compliance Officer (or designee, in the event of an extended absence) will manage and respond to Helpline calls, where a telephone call back number is provided. The same process applies to HealthReach. A caller may also speak directly to, mail, email or visit the appropriate compliance officer to discuss a concern directly.

The Compliance Officer or designee will:

- Summarize callers' concerns and communicate them to the appropriate individual(s) for resolution.
- Maintain a log or file that documents all calls: date/time, concern, result of investigation and feedback to callers.

B. Confidentiality

- a. The outgoing message on the Helpline will inform callers of their right to anonymity.
- b. Callers will not be required to disclose identity.
- c. If disclosure is made, all reasonable steps will be taken to protect the caller's identity.
- d. Only persons with a bona fide "need to know" will be informed of a caller's identity.

C. Promise of Non-Retaliation for Helpline report as stated in MGH Code of Ethical Conduct

1. It is a violation of the MaineGeneral Health Code of Ethical Conduct and applicable laws to retaliate or take action against anyone making a good faith report of a concern or potential compliance violation. .

D. Investigation and Reporting Mechanisms

- a. A caller's complaint will only be discussed with individuals selected by the Corporate Compliance Officer. They may include outside legal counsel, and the Director of MaineGeneral Health Human Resources, or other appropriate personnel as necessary to investigate the concern.
- b. General reports including general information about Compliance Helpline calls will be presented to the Board, CEO and the Compliance Committee as necessary.

- c. If a helpline call suggests medical practice concerns, these will be summarized for distribution to the appropriate representative of the medical staff.
- d. Sexual harassment, discrimination, compensation or other employment related complaints will be referred to Human Resources.

E. Methods For Investigating and Resolving Complaints

1. Once the complaint has been reviewed and referred to a key individual(s), the investigation will commence in an attempt to resolve the concern. .
2. In some cases, communication with the caller may be required. The Corporate Compliance Officer will act as the intermediary with the caller where contact information was provided. . If the caller has expressed a desire for complete anonymity, the investigation will continue with information available.
3. The results of the investigation will be reported to the call where appropriate and/or where possible. Results should be included in the log or file of the Corporate Compliance Officer and reported through the Compliance Committee, the Board and the CEO.

F. Employee Training

Authorized users of the Helpline include all members of the MaineGeneral Health workforce, including employees, physicians, executive staff, Board of Directors, contractors, volunteers and vendors.

MaineGeneral Health will provide detailed, ongoing training to all new employees during orientation and to all employees as needed.

Training will include:

- how to access the Helpline
- the type of concerns addressed
- discussion of confidentiality
- review of non-retaliation policy
- helpline availability and how to reach the Ethics and Compliance Officer, or others involved in Compliance matters, directly
- how complaints are investigated and resolved

- G. Publicity: The Helpline telephone number will be regularly published in the InGeneral newsletter and in other online or printed media throughout the MaineGeneral Health System.
- V. POLICY STORED AT: Original signed policies are maintained in Thayer Campus Patient Services Administration Office of MGMC, the MaineGeneral Rehabilitation & Nursing Care President's Office, the Central Administration Offices of MGHA, the Administration Office, Jackman or in the Seton Campus Human Resources Administration Office of MGH as applicable. Also, copies of the MGH Policy Manuals are kept in the Seton Campus Library, in the Augusta Campus Patient Services Administration Office and the HealthReach Network Central Office for reference and/or as applicable. Current policies may be accessed via the MaineGeneral Intranet at intranet.mainegeneral.org.
- VI. POLICY APPLIES TO:
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| <input type="checkbox"/> MaineGeneral Health | <input type="checkbox"/> MaineGeneral Retirement Community |
| <input type="checkbox"/> MaineGeneral Medical Center | <input type="checkbox"/> Jackman |
| <input type="checkbox"/> MaineGeneral Health Associates | <input type="checkbox"/> HealthReach |
| <input type="checkbox"/> MaineGeneral Rehab & Nursing Care | <input checked="" type="checkbox"/> All |
- VII. PROPONENT: Compliance Officer
- VIII. KEY SEARCH WORDS: Corporate, Compliance, Helpline