

Compliance Hotline

Effective Date: 7/28/2014

Draft/Review Date: 8/18/2014

Policy

- A. It is the policy of the ACO to provide a mechanism by which communications or potential issues may be escalated with confidentiality and/or anonymity.

Applicability

This policy and procedure applies to all Participants, Providers/Suppliers, and other individuals or entities performing functions or services related to the ACO's activities.

Procedure

- A. Collaborative Health Systems (CHS) will maintain a Compliance Hotline to serve as a mechanism to receive, record, and respond to compliance questions and concerns, reports of improper conduct, reports of suspected non-compliance, and allegations of fraud waste and abuse. This hotline allows for anonymous reporting.
- B. The ACO must ensure that the Compliance Hotline number is provided to new hires and annually thereafter. The ACO must also ensure that the number can be found in the Code of Conduct, on the ACO website, and posted in various locations throughout the common and meeting areas of the facilities.
- C. Following a call to the Compliance Hotline, the call and issues reported will be recorded in a database for investigation, tracking, compilation and reporting.
 1. The individual can request information and progress reports, as appropriate, on a confidential basis.
- D. Issues identified through the investigative process are escalated, as appropriate, to the Compliance & Ethics Subcommittee and reported on a quarterly basis. This Subcommittee is responsible for ensuring all appropriate investigation protocols are followed and identified issues are resolved.
 1. All reported compliance issues are investigated, documented and reported to the Compliance & Ethics Subcommittee and Governing Body, as appropriate.
 2. Issues will be escalated to law enforcement authorities, including the Medicare Integrity Contractors (MEDICs), in accordance with federal guidance and the ACO's policies and procedures, as appropriate and in a timely manner.

Reporting

- A. Issue reports are provided to the Compliance & Ethics Subcommittee on a quarterly basis and to the Governing Body, as appropriate.

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Related Documentation

- A. 42 CFR §425.300(a)(3)
- B. ACO Terms & Definitions Policy
- C. Compliance Plan
- D. Code of Conduct

Additional Guidance

The Compliance Hotline phone number is 1-800-388-1563. TTY users should call the following number 1-877-486-2048.