

Policy: COMPLIANCE HELPLINE
Type: CORPORATE COMPLIANCE POLICY and PROCEDURE
Applicable to: All RWJBarnabas Health Facilities and Medical Groups, including but not limited to: Community Medical Center, Clara Maass Medical Center, Jersey City Medical Center, Monmouth Medical Center, Monmouth Medical Center Southern Campus, Newark Beth Israel Medical Center, RWJUH-Hamilton, RWJUH-New Brunswick, RWJUH-Rahway, RWJUH-Somerset, Saint Barnabas Medical Center, Barnabas Health Ambulatory Care Center, Barnabas Health Behavioral Health Center, Children’s Hospital of NJ at Newark Beth Israel Medical Center, Children’s Specialized Hospital, The Bristol-Myers Squibb Children’s Hospital at Robert Wood Johnson University Hospital, The Unterberg Children’s Hospital at Monmouth Medical Center, Medical Group of RWJBarnabas Health and Rutgers Health
Policy owner: RWJBH Corporate Compliance Department
Effective date: January 3, 2020
Approved by: Chief Compliance Officer; Vice President Compliance
Accountable for: Chief Compliance Officer; Vice President Compliance

Policy Statement:

RWJBarnabas Health shall maintain a reporting system to enable all individuals to raise and report potential compliance-related concerns, issues and disclosures. Individuals may directly contact a Compliance Officer in the Compliance Department or report a concern, issue or disclosure through the Compliance HelpLine (hotline) or the HelpLine Web Reporting Site. The Compliance HelpLine or the HelpLine Web Reporting Site are anonymous and confidential avenues for individuals to raise concerns and are available twenty-four (24) hours a day, seven (7) days a week. Such disclosures may include any issues, questions or concerns identified by or associated with the RWJBarnabas Health Compliance Code of Conduct, policies and procedures, practices, including without limitation, those related to a Federal health care program (e.g., Medicare, Medicaid), believed by the individual to be a potential violation of criminal, civil or administrative law.

The Compliance Helpline Program shall emphasize a policy of non-retribution and non-retaliation and shall include a reporting mechanism for anonymous communications for which appropriate confidentiality shall be maintained.

RWJBarnabas Health shall appropriately publish and promote the Compliance HelpLine Program (e.g., Compliance HelpLine posters in prominent common/conspicuous areas; the RWJBarnabas Health Bridge (private computer system intended for use by employees); Compliance Code of Conduct; Compliance education and training). Employees are educated in the Compliance Code of Conduct and Compliance HelpLine Program and procedure upon initial hire and additional education is provided, where necessary.

Procedure:

1. HelpLine inquiries will be received and documented by a Communications Specialist employed by a contracted outside vendor (e.g., NAVEX Global Compliance Services) and is available to all individuals twenty-four (24) hours a day, seven (7) days a week.
2. The Communications Specialist will alert a designated member of the Corporate Compliance Department in accordance with the Priority Level timeframes as defined below in the “Definitions” section.
3. The HelpLine report issued by the Communications Specialist will contain the following information:
 - Name and/or location of System Facility or Medical Group
 - Date of the HelpLine call or web report
 - Name and contact information of the caller or web reporter, if provided
 - HelpLine awareness source (e.g. educational session, poster, supervisor/manager, email, web page)
 - Unique report number
 - Duration of call, where applicable
 - Identification code of the Communications Specialist
 - Information and details regarding the potential compliance or business ethics concern
 - Name(s) of individuals alleged to be involved in the concern
 - Caller or web reporter follow-up date and PIN
 - Report Priority Classification
4. A specific follow-up date and PIN may be assigned to facilitate a response to the caller or web reporter.
5. Depending upon the nature of the allegation and if the caller or web reporter has provided his or her name, the Communications Specialist may indicate that a member of management may contact the caller or web reporter to discuss the concern.
6. Callers or web reporters will be advised that a Compliance Officer will act on the information the caller or web reporter has provided and it may lead to a Compliance Officer’s involvement in the investigation. As a precaution, if an individual wishes to withhold his or her name in the investigation, the caller or web reporter will be advised that his or her anonymity will be guarded and protected; however, those involved in the investigation may conclude as a result of the facts that the caller or web reporter contacted the Compliance HelpLine.
7. Compliance HelpLine inquiries will be processed and investigated in accordance with guidelines set by the RWJBarnabas Health Corporate Compliance Department. The



Compliance Officer shall apprise and update the facility or Medical Group's leadership team of Helpline calls or web reports and the Chief Compliance Officer or designee (e.g., Vice President, Compliance), as appropriate.

8. The Compliance Officer shall engage other members of the Corporate, facility or Medical Group's management teams in preparing a response, where necessary, as follows:
 - a) All HelpLine calls, web reports or matters are referred to and brought to the attention of the appropriate department for investigation, as necessary (e.g., including but not limited to the following departments: Human Resources, Legal Affairs, Standards/Quality, Patient Care Services, Security, Internal Audit).
 - b) The appropriate department shall be consulted on matters, issues and concerns that are not compliance-related for investigation and preparation of a response, in accordance with existing department specific policies and procedures. All completed responses shall be forwarded to the Compliance Officer for evaluation. A final report shall be provided to the Chief Compliance Officer or designee (e.g., Vice President, Compliance), where necessary.
 - c) The following calls or web reports, based on certain circumstances, may be referred to the appropriate department, as well as independently investigated by the Compliance Officer, where necessary:
 - i. All level "A" and applicable level "B" calls or web reports
 - ii. Disclosures that are of a repeat nature or involve a specific department on a repetitive basis.
9. Assistance from other members of RWJBarnabas Health Corporate Compliance or Legal Affairs Department will be sought as necessary if the matter appears to involve a substantive compliance or business ethics issue or legal matter.
10. The RWJBarnabas Health Corporate Compliance Department will determine whether additional information is necessary to complete the investigation and address the caller or web reporter's concern.
11. The Compliance Officer, at the conclusion of the investigation, will ensure that there is a timely and completed Compliance HelpLine Response Form containing the following elements: a) Summary of Investigation, b) Findings, c) Corrective Action, d) Monitoring. The Response Form is maintained in the Compliance file and forwarded to the Chief Compliance Officer or designee (e.g., Vice President, Compliance), as necessary.
12. If disciplinary or corrective action is required, the Compliance Officer will collaborate with the relevant Department Head/Manager/Supervisor, Senior Management, Human Resources representative, other members of the Corporate Compliance staff, or the



Legal Affairs Department, as necessary. Disciplinary and corrective actions will be taken in accordance with existing Human Resources policies and procedures.

13. Callers or web reporters who contact the Compliance Helpline seeking follow-up information will be provided sufficient detail regarding the investigation and its finding to communicate that the matter has been taken seriously and dealt with according to the Compliance Code of Conduct, policies and procedures and other guidance pertaining to the allegation.
14. The response time frames set forth in the “Definitions” section below indicate the time frames within which the appropriate department will investigate and process the Compliance HelpLine inquiry, and provide a response to the contracted outside vendor (e.g., NAVEX Global Compliance Services).
15. In the event that a Compliance Helpline disclosure is identified with a combination of Priority levels, the initial response will be made in accordance with the highest priority level timeframe identified in the disclosures, and any required follow-up response will be made in accordance with the follow-up timeframes of the lower priority disclosure.
16. Potential compliance-related concerns, issues and disclosures received directly by the Compliance Officer will be investigated and handled in accordance with the procedure outlined above, where applicable, and in accordance with guidelines set by the RWJBarnabas Health Corporate Compliance Department.

Definitions:

Priority A:	Eminent issue(s) deemed an emergency call or web report. Immediate action is required because harm to the organization and/or individual may be occurring. Global Compliance Services will dispatch an alert within one (1) hour of receiving a call or web report (pager may be activated). An initial response from RWJBH to Global Compliance Services on the outcome of allegation(s) is required within three (3) business days. If a follow-up response is required, this response will be completed within ten (10) business days.
Priority B:	Significant but not deemed an emergency. Global Compliance Services will dispatch an alert within twelve (12) hours of receiving a call or web report. A response from RWJBH to Global Compliance Services on the outcome of allegation(s) is required within fourteen (14) calendar days. If a follow-up response is required, this response will be completed within twenty-one (21) calendar days.
Priority C:	Routine issues, mainly Human Resource (HR) issues. Global Compliance Services will dispatch an alert within twenty-four (24) hours of receiving call or web report. A response from RWJBH to Global Compliance Services on the outcome of allegation(s) is required within thirty (30) calendar days. If a follow-up response is

	<p>required, this response will be completed within thirty (30) calendar days.</p> <p>Helpline inquiries that are referred to the Human Resources Department will be investigated and processed according to established Human Resources policies and procedures.</p>
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Related Documents:

Corporate Compliance Department References:	<p>Compliance Code of Conduct Compliance Program Poster Compliance HelpLine Response Form</p>
Compliance Regulatory References:	<p>Department of Health and Human Services, Office of the Inspector General, Publication of the OIG Compliance Program Guidance for Hospitals, 2/1998. https://oig.hhs.gov/authorities/docs/cpghosp.pdf</p> <p>Department of Health and Human Services, Office of Inspector General. OIG Supplemental Compliance Program Guidance for Hospitals, January 2005. https://oig.hhs.gov/fraud/docs/complianceguidance/012705HospSupplementalGuidance.pdf</p> <p>“Measuring Compliance Program Effectiveness: A Resource Guide”; HCCA-OIG Compliance Effectiveness Roundtable; Issue Date: March 27, 2017.</p>