

NEIGHBORHOOD HEALTH PLAN POLICY

CHAPTER HEADING: Compliance Hotline/Helpline

POLICY #: Comp 02-04

ORIGINATOR: Richard L. Dropski

DATE APPROVED: January 22, 2004

REVISED:

APPROVED BY: Executive Committee

IMPLEMENTATION DATE: March 2003

DATE OF LAST REVISION:

RESPONSIBLE DEPARTMENT: Quality and Compliance

IMPACTED TEAMS: All NHP

POLICY

- NHP will maintain a telephone Compliance Hotline/Helpline that employees may use 7 days per week, 24 hours per day to report problems or concerns either anonymously or in confidence.
- The Compliance Hotline/Helpline will be operated by an independent, external vendor who is contractually bound to maintain the anonymity and confidentiality requested by any caller to the Hotline/Helpline.
- Employees who report problems and concerns in good faith via the Hotline/Helpline will be protected from any form of retaliation or retribution.
- Employees who report problems and concerns to the Compliance Hotline/Helpline will have access to appropriate feedback regarding the status of their report.
- All employees who have access to the reports generated from the Compliance Hotline/Helpline are expected to act with utmost discretion and integrity in assuring that information received is acted upon in a reasonable and proper manner.
- The Director of Quality and Compliance is responsible for the oversight of the Compliance Hotline/Helpline.
- The availability of NHP's Compliance Hotline/Helpline will be communicated, at least annually, to all employees through organizational policies, orientation instructions, newsletters, e-mail communications and other communication vehicles as deemed appropriate.

PURPOSE

NHP is committed to the timely identification and resolution of all issues that adversely affect employees, members or the organization. To this end, NHP has established a number of mechanisms, including a confidential and anonymous Compliance Hotline/ Helpline, for reporting problems and concerns and for obtaining clarification and direction regarding any compliance matter. The establishment of this Compliance Hotline/ Helpline provides an avenue for employees or other interested parties to report suspected criminal activity, and illegal or unethical conduct occurring within NHP when other resolution channels are ineffective or when the reporter wishes to remain anonymous. It also services as a mechanism through which employees may seek and obtain clarification on any compliance related matter or problematic business process that may evolve into a compliance matter.

DEFINITIONS

Anonymity means that the caller can choose not to disclose his/her identity and that no tracking systems (e.g. caller ID) are in place which would enable identification of the caller or phone from which the call is being placed.

Confidentiality means that the caller's name will not be revealed to NHP without the caller's authorization unless discoverable as part of a criminal investigation.

Good faith reporting means that the employee truly believes the problem or information they are reporting is accurate and in violation of NHP's policies or procedures or other rule, regulation or law.

Retaliation and Retribution includes any form of disciplinary action, considerations for merit increases, promotions or other forms of employee benefits. However, contacting the Compliance Hotline/ Helpline will not preclude disciplinary action from being taken if the caller was personally involved in the wrongdoing that he or she is reporting, although the self-reporting may be taken into account in determining the appropriate course of action.

PROCEDURES

1. NHP will contract with an external, independent vendor to provide an anonymous and confidential Hotline/ Helpline for the reporting of any compliance concerns.
2. The external, independent vendor will inform NHP of all reports made to the Compliance Hotline/ Helpline. The confidentiality of the caller, if requested, will be maintained to the extent practical and allowed by law.
3. The Director of Quality and Compliance is responsible for:
 - Ensuring the availability of a Compliance Hotline/ Helpline and ensuring that staff are periodically made aware of its existence;

- Conducting appropriate investigations and follow-up on all concerns reported to the Compliance Hotline/Helpline, enlisting as appropriate, other departments, legal counsel or consultants;
 - Providing feedback to the external, independent vendor on the status of all investigations reported to the Compliance Hotline/Helpline, while ensuring the confidentiality of all parties involved in the complaint and the integrity of any investigative process;
 - Reporting Compliance Hotline/Helpline activity to the Standards, Expectations and Compliance Committee (SECC) and/or the Executive Committee and the NHP Board of Directors on a quarterly basis;
 - Maintaining security for all calls and related documents for ongoing and completed investigations.
4. All callers to the Hotline/Helpline will be informed of their rights, including the right to remain anonymous, NHP's non-retaliation policy and other pertinent information.
 5. No attempt will be made by NHP or the external, independent vendor to identify an anonymous caller.
 6. Whenever a caller discloses his or her identity on the Compliance Hotline/Helpline, it will be held in confidence to the fullest extent practical and allowed by law.
 7. Any matter reported to the Compliance Hotline/Helpline that is deemed to be potentially unlawful by the Vice President of Quality and Compliance will be referred to legal counsel for advice and guidance.
 8. All investigations resulting from calls to the Compliance Hotline/Helpline will be conducted in a fair and impartial manner.
 9. The external, independent vendor will produce and make available monthly reports on all Compliance Hotline/Helpline activity.