

Beaumont

HEALTH

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| Title Compliance Trust Line | Location ALL Beaumont Health | Functional Area Compliance |
| Policy Owner Vice President System Compliance | Document Type Policy | Effective Date 04/11/2016 |

I. CORPORATE AUTHORITY

Beaumont Health ("BH") as the corporate parent to William Beaumont Hospital, Botsford General Hospital, and Oakwood Healthcare Inc., ("Subsidiary Hospitals") establishes the standards for all policies related to the clinical, administrative and financial operations of the Subsidiary Hospitals. The Subsidiary Hospitals, which hold all health facility and agency licenses according to Michigan law, are the covered entities and the providers of health care services under the corporate direction of BH. The Subsidiary Hospitals' workforces are collectively designated as BH workforce throughout BH policies.

II. PURPOSE

As part of Beaumont Health's compliance program, Beaumont Health provides an effective line of communication for receiving reports of suspected or actual compliance, enterprise risk, and fraud, waste and abuse issues that may adversely affect employees, patients or the organization. The compliance Trust Line establishes a communication channel to provide persons associated with Beaumont Health a mechanism to report Problems or Concerns through a toll free number (1-800-805-2283) or a web based portal and is intended encourage individuals to report Problems or Concerns in good faith without fear of Retaliation. In addition to establishing the compliance Trust Line, the Beaumont Health Corporate, Audit and Risk Department has adopted procedures to protect the anonymity of Reporters when anonymity is requested as well as procedures to ensure timely investigation and resolution of reported issues.

III. DEFINITIONS

- A. Enterprise Risk - A threat of damage, injury, liability, loss, or any other negative event that is caused by external or internal actions that may be avoided or mitigated through proactive management of organization vulnerabilities. Reports of Enterprise Risks include actual or suspected concerns related to financial, operational, and strategic processes and programs that may be identified.
- B. Problems or Concerns – any issue a Reporter deems necessary to report that may adversely affect employees, patients or the organization.
- C. Reporter – and individual who makes a report to the Trust Line either by the toll-free number or through the web-based portal via the internet.
- D. Retaliation – an adverse action taken by Beaumont Health because a person reported a concern through the Trust Line in good faith.
- E. Third Party Vendor – an outside vendor that specializes in compliance hotline operations that Beaumont Health has contracted with to assist in the operation of the Trust Line.

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F. Trust Line – collectively refers to the toll-free line to an outside call center and a web-based portal accessed through the internet.

IV. GENERAL

Beaumont Health's Code of Conduct requires that Beaumont Health workforce report Enterprise Risks as well as known or suspected violations of laws, regulations, Beaumont Health policies or procedures or other concerns so these issues can be promptly investigated and resolved.

Beaumont Health has established and will maintain a toll-free telephone hotline, known as the Trust Line, which individuals may use to report Problems or Concerns in good faith, either openly or anonymously. Individuals who report Problems or Concerns in good faith to the Trust Line will **not** be subject to Retaliation for making such a report. Individuals shall not intentionally use the Trust Line to make false allegations.

Trust Line investigators respond with discretion, purpose and integrity in assuring that information received is acted upon in a timely, reasonable, and proper manner. Anyone who receives or is assigned responsibilities for a Trust Line Report shall be required to comply with the confidentiality principles and privacy policy adopted by Beaumont Health.

V. TIMELINES

The Corporate Compliance, Audit and Risk Department shall establish timelines for the investigation and resolution of Reports made through the Trust Line. Investigators assigned to a matter will communicate back to the Reporter through the "Reply to Reporter" feature in the Third Party Vendor tool both an initial response acknowledging receipt of the report and a final response regarding the disposition and resolution of a reported concern.

VI. PROCEDURES

The Beaumont Health Corporate Compliance, Audit and Risk Department shall maintain responsibility for the Trust Line operation which shall include ensuring that Trust Line reports are addressed in an appropriate and timely manner, as well as in accordance with this and related policies and procedures. Other Trust Line responsibilities include:

- A. Ensuring proper functioning of the Trust Line.
- B. Establishing reporting and records maintenance processes and procedures.
- C. Conducting appropriate investigations and follow-up, including coordinating with other departments to investigate and resolve reports.
- D. Referring reports to other departments for investigation when appropriate.
- E. Providing investigation feedback to callers when requested and to the extent permissible.
- F. Reporting Trust Line activity to Management and the Audit and Compliance Committee of the Board of Directors (the Board).
- G. Acting with discretion, integrity and confidentiality when handling information reported via the Trust Line and maintaining security for all reports and related documents.

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VII. TRAINING

Training material for staff that enter investigation and resolution data into the Trust Line is available in the *Interlink Investigator's Guide* and through a PowerPoint training presentation both accessed through the Third Party Vendor (Navex) help menu.

VIII. OPERATION

The Trust Line will be staffed with qualified and properly trained personnel by a Third Party Vendor. Callers will be given the opportunity to speak with a live operator 24/7 and 365 days per year. Callers to the Trust Line will hear a message explaining the Trust Line operation. No attempt will be made to identify a caller who requests anonymity. However, the intake process will include obtaining the following information:

- A. Name or location of facility
- B. Date of call
- C. General nature of allegation
- D. Relevant information concerning the allegation
- E. Name of caller (case number if anonymous)
- F. Contact phone number for caller or date and time in which call back is expected by caller

Whenever callers disclose their identity, it will be held in confidence to the extent practical or allowed by law. The Corporate Compliance, Audit and Risk Department will direct any report deemed potentially unlawful to Legal Affairs for further guidance and investigation support. The Corporate Compliance, Audit and Risk Department may require other departments, as appropriate, to provide advice or to assist in or fully conduct investigations related to reports received. Problems and concerns that are reported directly to a member of the Corporate Compliance, Audit and Risk Department shall be entered into and documented utilizing the Trust Line management system.

The Corporate Compliance, Audit and Risk Department will report periodically to management and the Board regarding Trust Line activity. This report will include relevant metrics, including the total number of calls received, acted upon and general results from the Trust Line operation. In addition, the report will include any risk or compliance trends identified as well as recommendations for system-wide improvements or corrective actions arising from the result of the operation and related investigations.

IX. INQUIRIES

Questions regarding this Policy can be addressed to the Corporate Compliance, Audit and Risk Department.