

 <p><b>HAWAII HEALTH SYSTEMS CORPORATION</b> <i>Quality Healthcare for All</i></p> <p align="center"><b>POLICY</b></p>	<p><b>Department:</b></p> <p align="center"><b>Corporate Compliance</b></p>	<p><b>Policy No.</b></p> <p align="center"><b>CMP 0004A</b></p>
		<p><b>Supersedes Policy No.</b></p>
<p><b>Subject:</b></p> <p align="center"><b>COMPLIANCE HOTLINE AND OTHER INTERNAL METHODS OF REPORTING NONCOMPLIANCE POLICY</b></p>	<p><b>Approved By:</b></p> <p align="center"><i>Brenda S. Ho</i></p> <p>HHSC Board of Directors By: Brenda Ho Its: Secretary/Treasurer</p>	<p><b>Approved Date:</b></p> <p align="center">April 23, 2026</p>
		<p><b>Last Reviewed:</b></p> <p align="center">April 23, 2026</p>

**I. PURPOSE:**

To establish and maintain confidential, accessible, and reliable reporting mechanisms that enable employees, medical staff, contracted providers, volunteers, students, board member, vendors, and agents to report suspected fraud, waste, abuse, noncompliance with policies, laws or regulations, or other violations and to obtain guidance on compliance-related questions or concerns, without fear of retaliation or retribution.

**II. POLICY:**

HHSC is committed to fostering an ethical culture of compliance and requires that all workforce members report concerns of suspected noncompliance. HHSC will ensure that multiple reporting avenues are made available, including a compliance hotline, email, in-person reporting, and anonymous options. All reports will be taken seriously, investigated promptly and handled in accordance with applicable laws, regulations and organizational policies.

**A. RESPONSIBILITIES:**

- **Corporate Compliance Officer:** Oversees the hotline and reporting mechanisms. Reports incidents through a dashboard to the Audit and Compliance Committee and Corporate Compliance Committee.
- **Regional Compliance Officers:** Ensures investigations are conducted and reports outcomes to the Regional Compliance Committees.
- **Supervisors/Managers:** Must take all concerns seriously and refer them immediately to the Compliance Department.
- **Employees, Medical Staff, Vendors, Agents and Volunteers:** Are responsible for reporting suspected violations in good faith.

**III. APPLICABILITY:** This policy shall apply to all HHSC employees, medical staff, contracted providers, volunteers, students, board member, vendors, and agents.

**IV. AUTHORITY:**

- OIG Compliance Program Guidance

**V. RELATED POLICIES AND PROCEDURE(S):**

- CMP 0018 – Non-Retaliation and Non-Retribution

**VI. REFERENCES:**

- Federal Sentencing Guidelines, Chapter 8
- HRS §378-61 through 70 Hawai'i Whistleblowers' Protection Act
- HRS §661-21 through 25 Hawaii False Claims Act
- Labor Law Poster and Notice Requirements (whistleblower protections)