

 HAWAII HEALTH SYSTEMS C O R P O R A T I O N "Touching Lives Everyday" POLICY	Quality Through Compliance	Policy No.: CMP 004A
		Revision No.: 1
Subject: Compliance Hotline and Other Internal Methods of Reporting Noncompliance	Issued by: Audit and Compliance Committee	Effective Date: October 13, 2011
	Approved by:  HHSC Board of Directors By: Carol A. Van Camp Its: Secretary/Treasurer	Supersedes Policy: N/A Page: 1 of 2

I. **PURPOSE:** To establish various methods by which HHSC employees, medical staff, patients, volunteers, the public, and agents may report suspected fraud, abuse, waste, or other legal violations, as well as obtain answers to compliance-related questions and discuss compliance-related concerns.

II. DEFINITIONS:

Hotline: A phone system available to all employees, medical staff, patients, volunteers, the public, and agents that allows anonymous reporting of compliance concerns or questions.

Internal Reporting Systems: Any of various methods such as, but not limited to, email, hotlines, personal interviews, audits, reviews, mail, suggestion boxes, etc. used to communicate compliance-related issues.

III. POLICY:

- A. HHSC believes that establishing and maintaining open lines of communication will encourage participation in the HHSC Corporate Compliance Program.
- B. HHSC employees, medical staff, patients, volunteers, and, when appropriate, the public and contractors or agents of HHSC, shall be given the opportunity to report suspected cases of fraud, abuse or waste, or other legal violations, without fear of retaliation.
- C. HHSC employees, contracted providers and agents shall also be given the opportunity to ask compliance-related questions and to openly discuss any compliance-related concerns they may have.
- D. HHSC will establish and maintain a hotline and other internal reporting systems.
- E. HHSC shall establish intranet access to compliance information.
- F. The Chief Compliance and Privacy Officer shall continually monitor and evaluate the use and effectiveness of the internal reporting systems used and make whatever

recommendations to the Audit and Compliance Committee and the Corporate Compliance Committee that the Chief Compliance and Privacy Officer deems necessary or appropriate

IV. APPLICABILITY: This policy shall apply to all HHSC employees, medical staff, volunteers, and agents.

V. AUTHORITY: HHSC Corporate Compliance Plan (CMP0001) and HHSC Board bylaws.