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| University of Louisville Hospital | | POLICY/PROCEDURE | |
| Subject: HOTLINE | Policy no. 859-0315 | Page: 1 of 2 | |
| Author: CORPORATE COMPLIANCE | Eff. Date: 03/09/04 | Revised: 08/07 | |

Hotline

Purpose

The University of Louisville Hospital (ULH)/James Graham Brown Cancer Center (BCC) is committed to the timely identification and resolution of all issues that may adversely affect employees, patients, or the organization. Therefore, the University of Louisville Hospital/ULH/BCC has established communication channels to report problems and concerns including a telephone hotline 1-800-431-7245. Employees are encouraged to report problems or concerns either anonymously or in confidence via the hotline when they deem appropriate. The hotline establishes an avenue for employees or interested parties to report suspected criminal activity and illegal or unethical conduct occurring within the organization in the event other resolution channels are ineffective or the caller wishes to remain anonymous.

Policy

1. The ULH/BCC will establish and maintain a telephone hotline that employees, patients, vendors or others may use to report problems and concerns either anonymously or in confidence.
2. Employees who report problems and concerns in good faith via the hotline will be protected from any form of retaliation.
3. The Vice President of Compliance & Ethics is responsible for reviewing and investigating all hotline calls. The hotline is operated by an outside agency contracted with by the hospital.

Procedures

1. The Vice President of Compliance & Ethics' general responsibilities related to the hotline operation include ensuring that all hotline calls are addressed in an appropriate and timely manner, as well as in accordance with these and all related policies and procedures. Other responsibilities include the following:
 - Establishing reporting and records maintenance procedures;
 - Conducting appropriate investigations and follow-up;
 - Referring calls when appropriate;
 - Providing feedback to callers when necessary;
 - Reporting hotline activity to the Corporate Compliance & Ethics Committee; and
 - Maintaining security for all calls and related documents.
2. The hotline will be staffed with qualified individuals as part of the hotline contract.
3. No attempts will be made to identify a caller who requests anonymity.

4. Whenever callers disclose their identity, it will be held in confidence to the fullest extent practical or allowed by law.
5. The Vice President of Compliance & Ethics will communicate any matter deemed potentially unlawful to legal counsel.
6. Calls will be documented on the confidential hotline report form.
7. If the caller is requesting a follow-up to the report, the hotline service will set up a callback date. That date will be sent to the Officer of Compliance & Ethics. An identification number will be used to protect the identity of the caller.
8. The hotline operation will involve other departments, as appropriate, for advice or further investigation. In the event the Vice President of Compliance & Ethics is not, in good faith, satisfied that a matter brought before the aforesaid departments was appropriately addressed and resolved, the Vice President of Compliance & Ethics will be responsible for and is authorized to take the matter to other persons in positions of authority.
9. The Vice President of Compliance & Ethics will report periodically to the Corporate Compliance & Ethics Committee and to the Audit and Finance Committee of the Board of Directors regarding hotline activity. This report will include the total number of calls received, acted upon, and general results from the hotline operation. In addition, the report will include any recommendations for system-wide improvements or corrective actions arising from the results of the operation and related investigations.