

ComplyLine Procedures

Compliance Policies and Procedures

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General Description

Purpose: To establish protocols for how the Compliance, Internal Audit, Privacy & Data Security department (CCIAP) receives, documents, and processes ComplyLine calls/cases.

Scope: All Meridian-affiliated facilities, including but not limited to, hospitals, ambulatory surgery centers, outpatient imaging centers, home health agencies, long term care facilities, physician practices, service centers, imaging services and all Corporate and affiliated Departments. The toll-free ComplyLine is 877-888-8030.

Policy: The ComplyLine was created to afford team members, medical staff, patients, visitors, contractors and vendors an opportunity to get answers to compliance-related issues, identify or report potential ethical and legal concerns, possible breaches of patient privacy or confidentiality, or diversity concerns. All calls are treated as confidential. All team members are protected against retaliation for reporting an issue in good faith. Callers do not have to provide their identities to make a report.

1. ComplyLine cases will be handled in a manner which protects the privacy of the caller. Callers are advised that information will remain confidential to the maximum extent possible.
2. ComplyLine cases will be investigated within 10 business days of receipt under normal circumstances. If the investigation cannot be concluded in that time-frame, an interim status notice will be sent to inform the caller.
3. ComplyLine cases will be investigated by Meridian team members having a sufficient level of expertise/knowledge with regard to the issue presented by the caller.
4. Disciplinary or corrective action in response to substantiated allegations will be an integral part of the ComplyLine program as referenced in the Meridian Code of Conduct, and in accordance with Meridian Human Resource policies.

Procedure:

1. The intake phone call will be received by the external service (Service) utilized by Meridian for this purpose and a copy of the call report will be faxed to the Compliance Officer, Privacy & Data Security Officer or their designee(s) (Officer). The report seeks to include, but is not limited to:
 - Name or location of the facility or Meridian entity
 - Date of the call
 - Any relevant information concerning the allegations
 - Name of caller (unless anonymous)
 - Contact phone number for caller (if provided)
 - Whether the caller reported the situation to anyone else internal or external to Meridian
2. All callers are provided an identifying call number by the Service to reference and a call back time of approximately 10 business days later. Anonymous callers should be advised of the difficulty that can be related to investigation of an anonymous allegation, but in all instances the wishes of the callers must be respected. All callers should be thanked for their use of the ComplyLine.
3. The detailed information provided in the Call is retained in the on-line data base (Log) maintained by the Service, where are investigation and response entries are tracked and resolution detail is maintained. Only designated CCIAP staff will be authorized to access this information.
4. If the call is a general inquiry the information will be referred to the appropriate Meridian department if not already done by the Service, and an appropriate annotation reflecting this referral will be made in the hard copy or the Log.
5. After receipt of the information via fax from the Service, the Officer will do the following:
 - Identify the appropriate management team for the facility named in the call and the Human Resources Director of Operations (as noted in 9.)
 - Contact the appropriate site Administrator or team leader regarding the call issues
 - Indicate on the ComplyLine call report or on another report all referrals or contacts regarding the call.
6. Calls involving a member of the CCIAP staff will be referred to the Senior Vice President for Legal Services and General Counsel for review.

7. For cases with identified callers, the Officer will contact the caller within five business days of receipt of the call. The caller will be provided with the name and telephone number of a member of the CCIAP Department to contact for future inquiries.
8. The Officer will determine if additional information is necessary to develop an investigative plan. If additional information is required, the caller (if identified) will be contacted to obtain the additional information. If the Officer determines that an anonymous call cannot be investigated without additional information, the Service will be advised that insufficient information has been provided and the identification of additional information is required. The Service will provide this request for additional information to the caller when the caller phones the Service back on the follow-up date. Until the additional information is provided, the case will ordinarily be closed. Call accounts will be closed in situations where callers hang up without providing sufficient information to identify or investigate despite requests to do so by the Service.
9. The Officer will contact the Human Resources Director of Operations and the Human Resources Site Manager for cases which concern issues of potential violations of the Meridian Human Resources policies, and Human Resources will be responsible for investigating those situations.
10. Calls related to Privacy/Security issues will be referred to the Privacy and Data Security Officer, who will have access to the online notes as required in the Log.
11. The Officer will seek assistance from Meridian personnel with the required knowledge and expertise to perform an effective investigation. Investigations will be conducted promptly as per the Compliance Program Internal Investigations Processes Policy. The conclusion of any investigation will be entered in the ComplyLine Log. Any disciplinary action deemed appropriate will be coordinated with the Human Resources Department as per MHS-HR-01-2602.

Results of investigations will be input to the ComplyLine Log via electronic entry in cases where anonymity is requested. For callers/contacts who request direct contact, other methods (phone, letter, email) can be used to relay information, but a record of the investigation results must be retained for possible future reference. Copies of investigation outcomes can be provided to team leaders of departments involved on request

Responsibility: Corporate Compliance Officer
Corporate Director of Privacy and Data Security
Senior VP and Director, Human Resources
Senior VP, Legal Affairs and General Counsel
Senior VP and Chief Nursing Officer
Vice Presidents of Operations
All members of Meridian Health System workforce
Director of Internal Audit

Vice President - Cultural Diversity

Corporate Compliance Officer; Corporate Director of Privacy and Data Security; Director of Internal Audit; Senior Vice President, Legal Affairs and General Counsel; Director of Operations Human Resources

Requirements

Approvals: Meridian Compliance Operations Group approved 11/09/06

Revision History

v1: 01/12/2007
Document Created

v2: 03/02/2012
Update to electronic Log processes

Revision Notes: Update to electronic Log processes

Authorization History

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