



<b>Service Area:</b> General Compliance	<b>YALE NEW HAVEN HEALTH POLICY &amp; PROCEDURES</b>	
<b>Title:</b> Corporate Compliance Hotline Reporting		
<b>Date Approved:</b> 01/01/05, 9/30/2016, 02/27/2018	<b>Approved by:</b> Board of Trustees: Yale New Haven Health Services Corporation	
<b>Date Effective:</b> 01/01/05, 0/930/2016	<b>Date Reviewed/Revised:</b> 08/16/08, 03/04/11, 05/23/11, 05/18/15, 08/10/15, 9/30/2016; 12/13/17	
<b>Distribution:</b> MCN Policy Manager, Intranet	<b>Policy Type (I or II):</b> Type I	
<b>Supersedes:</b> N/A		

## PURPOSE

In an effort to uphold the integrity of the Yale New Haven Health System (YNHHS) Corporate Compliance program, YNHHS will provide a method for employees, members of the medical staff and other interested individuals of each Delivery Network to report concerns or to make inquiries and remain anonymous, if so desired.

**YNHHS Corporate Compliance Hotline:**  
888-688-7744 or  
[www.ynhhscomplianceprogramhotline.com](http://www.ynhhscomplianceprogramhotline.com)

## APPLICABILITY

This policy applies to YNHHS, and each of its affiliated entities, its affiliated hospitals (Bridgeport Hospital, Greenwich Hospital, Yale New Haven Hospital, Lawrence + Memorial Hospital, Westerly Hospital, and any other hospital that affiliates with YNHHS), its affiliated providers (including but not limited to Northeast Medical Group and Visiting Nurse Association of Southeastern Connecticut), and each of their subsidiary entities.

## POLICY

All employees, members of the medical staff and other interested individuals are encouraged to report instances of potential non-compliance or pose questions when a regulation or policy is unclear. Non-compliance is defined as not following applicable Federal, State or municipal laws, requirements of Federal and State health programs such as Medicare and Medicaid, or YNHHS policies and procedures.

## Corporate Compliance Hotline Reporting

Reports can be made anonymously without fear of retribution or adverse consequences. Any form of retaliation against any employee or other interested individual who made a report in good faith is strictly prohibited.

Non-compliance is defined as not following applicable Federal, State or municipal laws, requirements of Federal and State health programs such as Medicare and Medicaid, or YNHHS policies and procedures.

Employees are encouraged to utilize the reporting “chain of command” by contacting their supervisor or department head. If you feel uncomfortable reporting through normal channels of communication, or wish to raise the issue anonymously, you may access the Compliance Hotline.

### **PROCEDURES**

1. The Corporate Compliance Hotline is run by an independent third-party provider and is available online or by telephone, 24 hours a day; 7 days a week for those individuals who wish to speak with a representative or report their concern online.
2. Individuals are advised that information will remain confidential to the maximum extent possible.
3. A case number is assigned at the time of the initial telephone call or web report. The individual is encouraged to write down the case number should they choose to call back or access the web site for a status of the case.
4. The YNHHS Office of Privacy & Corporate Compliance (OPCC) will receive an e-mail notice from the hotline vendor that a call or web report has been received. The report will provide the statements made by the individual.
5. The OPCC will respond within twenty four (24) business hours of receipt of the questions received and/or reports made by entering an initial statement in the hotline vendor database.
6. The OPCC will work with other departments as appropriate for investigating and resolving the case. The OPCC will advise the other departments of the response/due date and ensure a response is received by that time.
7. The OPCC will document details of the Hotline call, including the resolution in the OPCC database, enter a closing statement in the hotline vendor database and close the case.
8. General findings will be reported in quarterly Compliance Committee Reports.

### **REFERENCES**

N/A

## Corporate Compliance Hotline Reporting

### **RELATED POLICIES**

Code of Conduct

Non-Retaliation and Non-Retribution for Reporting Policy