

HACKENSACK UNIVERSITY MEDICAL CENTER
Administrative Policy Manual

Hotline Operations

Policy #: 703

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Policy: Hackensack University Medical Center will provide employees and Vendors doing business with the Medical Center with a confidential and anonymous means of reporting on compliance related issues when normal reporting mechanisms are not appropriate. Hackensack University Medical Center has established a hotline as part of the Corporate Compliance program. The Hotline is a toll free telephone number **(888-411-0012)** available twenty-four (24) hours a day, seven (7) days per week, operated by National Hotline Services. Hackensack University Medical Center places an affirmative duty on all employees and Vendors to report violations of applicable laws, regulations, the Hillcrest Health Service System Vendor Relationships policy or the Code of Conduct. The Hotline is designed to provide employees and Vendors with an additional means of reporting such violations. Hackensack University Medical Center has a strict policy of non-retribution for all good faith reporting.

Administration: The Chief Compliance Officer is responsible for the administration and subsequent revisions to this policy.

Procedure:

1. All callers to the Hotline will receive the same pre-recorded message explaining how the Hotline operates, the policy against non-retaliation and the ground rules of the operation.
2. A caller to the Hotline is not required to disclose his/her identity. All those who contact the Hotline shall be assured anonymity as allowed by law or in the case where they identify themselves, confidentiality. No attempt will be made to trace the source of the call or identify the caller when anonymity is requested.
3. While callers will not be asked to disclose their identity, in some circumstances it will not be possible to act on a caller's complaint without information that may disclose their identity or the caller's may become apparent during the call. In such circumstances, the caller's identity will be held in confidence to the fullest extent of the law.
4. Incoming Hotline calls are logged on the National Hotline Service confidential website that has restricted access and the Compliance office is notified of each call via email. The Corporate Compliance Officer evaluates each email and initiates appropriate follow-up. A summary log is available on the website which consists of the assigned control number, date received, type and subject of the call and the date the call was resolved or investigation closed.
5. The Compliance office will be responsible for the care and custody of all call documentation maintaining all files in a secure fashion.

6. Each caller is provided with a control number to protect their identity and asked to call back at an agreed time and date.
7. The Corporate Compliance Department will involve other departments as appropriate for advice or further investigation relating to Hotline calls. These other departments include, but are not limited to Human Resources, Audit Services and Security.
8. The Compliance Officer or his/her designee will report at least quarterly to the Executive Compliance Committee on the operation of the Hotline. This report will include the total number of call received and the general nature of the calls. Should trends or opportunities for systemic improvements be identified, recommendations will be made to effect change.

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