



Origination 8/17/2020  
Last 5/15/2023  
Approved  
Effective 5/15/2023  
Last Revised 5/15/2023  
Next Review 5/14/2024

Owner **Shané Abercrombia:**  
Director of Compliance  
Area **Compliance**  
Applicability **VillageCare Corporate Services**

## Compliance Hotline Reporting

### PURPOSE

VillageCare (VC) is committed to providing Affected Individuals with a confidential, anonymous and non-retaliatory mechanism to report potential compliance issues, and has established a Compliance Hotline for this purpose. This policy outlines the process for reviewing these confidential and/or anonymous communication to ensure that all potential compliance issues are investigated, and corrective action is taken when compliance concerns are validated.

### DEFINITIONS

**"AFFECTED INDIVIDUALS"**: includes all persons who are affected by VillageCare's risk areas, including employees, appointees, the chief executive and other senior administrators, managers, contractors, agents, subcontractors, independent contractors, interns, students, vendors, volunteers, and governing body and corporate officers.

### POLICY

All Affected Individuals have a responsibility to report suspected or potential compliance issues.

All reports of suspected or potential compliance issues forwarded to the Chief Compliance Officer by means of the confidential and anonymous Compliance Hotline, will be evaluated to determine whether a concern has merit.

Reports of the following type of non-compliant practices will be taken seriously and investigated by the Compliance Department or Special Investigations Unit:

- Potential non-compliant, fraudulent, or abusive practice of documentation, coding and billing

- of services, cost reporting, and/or other practices leading to the submission of false claims;
- Potential violations of federal and/or state laws or regulations;
- Fraud, Waste or Abuse allegations
  - VCMAX allegations of FWA will be referred to the Special Investigation Unit (SIU) in accordance with the SIU Fraud, Waste & Abuse Review & Recovery Policy. All cases will be tracked in the VillageCare Ethicspoint case tracking system;
- Other potential violations of the Code of Conduct or Compliance Policies and Procedures;
- HIPAA Privacy & Security violations (in collaboration with the VillageCare Chief Information Security Officer)

Issues reported to the Compliance Hotline that are not under the scope of the Compliance department responsibility, will be coordinated with the appropriate program, department manager or other administrator, if applicable. Including, but not limiting to:

- Human Resources/Labor Relations
- Patient Safety or Harm
- Workplace threats of physical harm or injury to employees or affiliates.

The Compliance Hotline is a toll free number 1-844-348-2664 communicated to all Affected Individuals defined above, and displayed in common areas. The calls are answered by an external vendor 24 hours a day/7 days a week and managed by the Chief Compliance Officer or designee. All calls to the compliance Hotline are kept confidential and may be made anonymously.

The anonymity of all callers will be maintained to the greatest extent possible allowed by law and no retaliation, intimidation or harassment against individuals raising issues through the Compliance hotline, will be tolerated. Calls shall not be recorded or traced.

All callers who contact the Compliance Hotline will have the option to remain anonymous however, callers are encouraged to furnish their names in order to facilitate any follow up questions for additional information, during the investigation. Case numbers will be assigned to provide confidentiality to the greatest extent allowed by law.

Callers who desire feedback on the status of their complaint should contact the Hotline directly for an update.

## PROCEDURE

The following protocol sets forth the procedure upon receipt of a call from the external vendor utilized to answer the Hotline:

1. Reports will be received by the Chief Compliance Officer or his/her designee via secure email within one (1) working day of the call to the external vendor.
2. The Chief Compliance Officer or his/her designee will immediately review every report received.
3. Information received by the Chief Compliance Officer or his/her designee, will be

communicated to an investigator for action and assignment to the case in the Issue Tracking Log.

4. The log will record pertinent information including, but not limiting to the date of receipt of the report, results of the initial review and whether any investigative or audit activity has been undertaken to evaluate the allegations contained in the report.
5. Information received by the Chief Compliance Officer directly from either the Compliance Department email or main department telephone extension or the Department responsible for investigating the issue, will be entered into the Issue Tracking Log.
6. The Chief Compliance Officer or designee will respond to any inquiries regarding reports received via the Compliance Hotline by working with the Compliance Department staff or other departments involved, as appropriate.
7. The Chief Compliance Officer will coordinate responses to issues raised through the Compliance Hotline that do not pertain to Compliance policies, by referring information to the appropriate departments, e.g. Human Resources or Legal Affairs. The responsible departments will provide confirmation back to the Chief Compliance Officer within 30 days of receiving the report, that the issue has been resolved or is still being reviewed.
8. The Chief Compliance Officer or designee will, subject to confidentiality requirements, summarize all instances of potential noncompliance, resolution activity, investigation assignments, corrective actions, and recommended sanctions for presentation to the Corporate Compliance Committee and Audit Committee of the Board of Directors, on a periodic basis.

## Approval Signatures

Step Description	Approver	Date
Final Approval	Emma Devito: President & CEO	5/15/2023
Compliance Officer	Dara Quinn: Chief Compliance Officer	5/12/2023
	Shané Abercrombia: Director of Compliance	5/11/2023