

ONEIDA HEALTHCARE CENTER, ONEIDA, NEW YORK

ADMINISTRATIVE POLICIES AND PROCEDURES

Policy Number: 16-1

Policy Date: 12/4/00

Reviewed: 6/13/08, revised 10/09/08

Department: Corporate Compliance

Subject/Title: Compliance Reporting & Response System

**POLICY**

As part of our Corporate Compliance Program, Oneida Healthcare Center (OHC) has developed and publicized a reporting system whereby Employees and Agents can pose compliance-related questions and/or report perceived "non-compliance" by others within the organization anonymously and/or confidentially without fear of retribution or adverse consequences. Non-compliance is defined as failure to comply with applicable Federal and state laws and requirements of Federal and state health programs (including Medicare, Medicaid and Oneida Healthcare Center's policies).

This *Reporting and Response Policy* describes the process OHC will follow in responding to potential incidents of non-compliance identified through its reporting system.

**PURPOSE**

Employees and Agents should be knowledgeable about the procedures for reporting a potential non-compliant activity and maintain an open line of communication to the Corporate Compliance Director and Corporate Compliance Officer.

**PROCEDURE**

**I. Organizational Reporting**

**Reporting of Potential Incidents of Non-Compliance**

All Employees and Agents are encouraged to promptly report all instances of perceived non-compliance. Consequently, OHC will promptly investigate reports received in a thorough manner. The Corporate Compliance Director should retain all records of any subsequent investigation of reported non-compliance matters in confidence.

All Employees and Agents have available to them the following anonymous and/or confidential reporting options:

- A. **Complete a written Compliance Reporting Form.** This form can be located on the OHC Intranet site. Click on "Corporate", then click on "Compliance" and you will see the Compliance Reporting Form. (Please refer to form below). These forms can also be located outside the Human Resources Department, ECF Administration, Outpatient Physical Therapy Building, and the Ears, Nose and Throat Specialists of Oneida. You can also locate this policy and form on OHC's external

website. Once the form is completed, it should be forwarded directly to the Corporate Compliance Director, Renee Olmsted, RHIA (361-2117) in the Informatics Department, who will initiate a response within two business days.

**B. Call Oneida Healthcare Center's Compliance Hotline at extension 2116** or phone 361-2116 to pose a compliance-related question or report any potential non-compliant incident. This hotline is serviced by an answering machine. Only the Compliance Director has access to the answering machine. This is a secure voice mail system and your message will remain confidential to the extent possible. You are encouraged to leave your name and contact phone number which could be a home or cell phone number if you prefer. The Corporate Compliance Director will respond to all messages left. However, in the Corporate Compliance Director's absence, the Corporate Compliance Officer will access the Hotline answering machine. Off site employees and agents should use the hotline or may complete a report form and mail it to the Compliance Director.

**C. Contact the Corporate Compliance Director or Corporate Compliance Officer Management** by phone or schedule an appointment to pose a compliance-related question and/or report any potential non-compliant incident.

Corporate Compliance Director  
Corporate Compliance Officer

Renee Olmsted 361-2117  
Vincent Maneen 361-2144

## **II. Organizational Response**

Once a report of potential non-compliance has been received, the Corporate Compliance Director will review the information and may conduct interviews or chart reviews, if deemed appropriate.

Appropriate steps shall be taken to correct the situation. The investigation may include interviews, review of relevant documents and consultation with external legal counsel. Records of the investigation shall include, but are not limited to, documentation of the alleged violation, key documents, findings and results of the investigation, corrective actions implemented and disciplinary actions taken. The results of the investigation may necessitate a referral to criminal and/or civil law enforcement agencies and/or the development of a corrective action plan.

If the incident(s) requires disciplinary action, the disciplinary process will proceed per OHC policy as outlined in the *Human Resources Progressive Disciplinary Policy*. The Corporate Compliance Director, along with relevant department managers and Members of the Management Compliance Committee, are responsible for evaluating Oneida Healthcare Center's training and education needs and ongoing monitoring activities to prevent the reoccurrence of any incidents of non-compliance.

In cases where the complainant is known, the complainant will be notified in writing of the outcome of the investigation, to the extent deemed appropriate, by the Corporate Compliance Director. In cases where the identity of the complainant is unknown, the organization will take reasonable steps to publicize the results.

A "Compliance Report Follow Up Form" will be initiated and completed by the Corporate Compliance Director.

## **Compliance Reporting Form**

**Instructions: Any Oneida Healthcare Center Employee, physician or agent may complete this form if you feel there was/is a situation of potential non-compliance with NY State regulations, Federal regulations, OHC's own policies or OHC's Corporate Compliance Program.**

**Please complete this form and forward or mail it to Renee Olmsted, the Corporate Compliance Director for review. Her office is located in the Informatics Department.**

Date:	
Name & department of individual writing this report (unless you wish to remain anonymous*):	
How do you wish the Compliance Director to contact you for follow-up?  Please provide phone number and/or email address.	Check one: Email/phone: ___ at OHC ___ at Home  Phone number: _____ Email address: _____
What are you reporting? Please explain your concern and why it concerns you.	
What are the date(s) or time frame for your concern?	
Department(s) involved:	
Any other individuals and/or department(s) involved (unless they wish to remain anonymous):	
Are there any supervisors or department managers you have spoken to about your concern? YES-NO	If yes, what actions did they take and what were you told?
Any additional information you would like to share?	

**Note:** \*The Compliance Director will maintain this report in a confidential manner, which means that your identity will not be disclosed unless, absolutely necessary. It is helpful for you to allow this to be handled confidentially rather than anonymously, so that the Compliance Director can contact you with any questions and with the outcome of her investigation. If you choose to remain anonymous, the Compliance Director may not be able to further the investigation or notify you directly of the outcome of any investigation. However, you may contact the Compliance Director directly at extension 2117 or phone 361-2117 if you have any further information or questions.

Revised 09/2008, 9/2009      CONFIDENTIAL

**FOR THE COMPLIANCE DIRECTOR'S USE:**  
**Compliance Report Follow Up Form**

**Part II (To be initiated by the Corporate Compliance Director or Officer within two business days of the receipt of a report)**

Date and time report received	
How was the concern reported	Anonymously---Confidentially
Date and time of initiating follow up (within 2 business days)	
Details of initial inquiry (regulations utilized, interviews conducted)	
Is there a need for a formal internal investigation?	YES-NO If yes, consider the use of external counsel for attorney-client privilege
Others notified	
Disposition including dates	
Referred to external counsel	YES-NO Date and time
Follow up conducted	
Corrective action	
Meetings conducted in relation to corrective action	
Any employee disciplined	
Disclosure to intermediary or other	
Any government involvement	
Any press involvement	
Reporter notified of outcome	Yes-No
Reporters' response	
Closed date	
Signature and date of Compliance Director	
Signature and date of Compliance Officer	