

## Compliance Hotline

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Effective Date: 01/01/2018

### Policy

- A. It is the policy of the ACO to provide a mechanism by which employees or contractors of the ACO, its Next Generation Participants and Preferred Providers, Next Generation Professionals, and other individuals or entities performing functions or services related to ACO Activities to anonymously report suspected problems related to the ACO to the compliance official.

### Applicability

This policy and procedure applies to all Next Generation Participants, Preferred Providers, Next Generation Professionals, and other individuals or entities performing functions or services related to the ACO's activities.

### Procedure

- A. Collaborative Health Systems (CHS) will maintain a Compliance Hotline to serve as a mechanism to receive, record, and respond to compliance questions and concerns, reports of improper conduct, reports of suspected non-compliance, and allegations of fraud waste and abuse. This hotline allows for anonymous reporting.
- B. The ACO must ensure that the Compliance Hotline number is provided to upon hire or contracting and annually thereafter. The ACO must also ensure that the number can be found in the Code of Conduct, on the ACO website, and posted in various locations throughout the common and meeting areas of the facilities.
- C. Following a call to the Compliance Hotline, the call and issues reported will be recorded in a database for investigation, tracking, compilation and reporting.
  - a. The individual can request information and progress reports, as appropriate, on a confidential basis.
- D. Issues identified through the investigative process are escalated, as appropriate, to the Compliance & Ethics Subcommittee and reported on a quarterly basis. This Subcommittee is responsible for ensuring all appropriate investigation protocols are followed and identified issues are resolved.
- A. All reported compliance issues are investigated, documented and reported to the Compliance & Ethics Subcommittee and Governing Body, as appropriate.
- B. Issues will be escalated to law enforcement authorities in accordance with federal guidance and the ACO's policies and procedures, as appropriate and in a timely manner.

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### Reporting

- A. Issue reports are provided on a quarterly basis to the Governing Body, as appropriate.

### Related Documentation

- A. Next Generation ACO Model Participation Agreement Section XVII
- B. ACO Terms & Definitions Policy
- C. Compliance Plan
- D. Code of Conduct

### Additional Guidance

The Compliance Hotline phone number is 1-866-364-1350. TTY users should call the following number: 711.