

**WEST VIRGINIA UNIVERSITY HEALTH  
SYSTEM  
POLICY AND PROCEDURE MANUAL**

**Policy IX.045S  
1st Effective 05/10/2016  
Revised 10/13/2021  
Reviewed 03/22/2023**

**COMPLIANCE HOTLINE PROTOCOLS**

**SCOPE:**

**All West Virginia University Health System (WVUHS) Entities\***

**POLICY:**

Any employee of West Virginia University Health System (WVUHS), or its affiliated entities, who observes unethical or illegal behavior, fraud, waste, or abuse has the responsibility to report these acts through normal administrative channels. An integral part of each entity's Compliance Program shall be the establishment of a hotline through which individuals shall be able, anonymously if so desired, to report violations of conduct or other non-compliant activity.

**PROCEDURE:**

1. If any employee sees or experiences potential misconduct, including inappropriate business practices, the first avenue of reporting should be their supervisor or another executive level manager at their location. To report a violation, employees are encouraged to call their applicable hotline number.
2. If none of the opportunities are open or appropriate to the circumstance, then the employee can call the WVUHS established hotline at 1-855-236-2041 or online at [wvuhs.ethicspoint.com](http://wvuhs.ethicspoint.com).
3. All Compliance Hotline cases received by WVUHS will be handled in a manner that does the utmost to protect the privacy of the caller/reporter.
4. All Compliance Hotline cases will be investigated within 30 days of receipt.
5. Compliance Hotline cases will be investigated by the Chief Compliance Officer with the assistance of persons having a sufficient level of expertise/knowledge with regard to the issue presented by the call.
6. Disciplinary or corrective action of violators in response to substantiated allegations will be an integral part of the Compliance Hotline program.
7. Callers who report suspected violations in good faith will not be disciplined or retaliated against. "In good faith" means the caller actually believes or perceives the information reported to be true.

**PROCESS:**

When the call is received at WVUHS, the following steps will occur:

\* West Virginia University Health System adopts this policy and procedure for WVU Hospitals, Inc.; Summersville Regional Medical Center; WVUHS Home Care, LLC; WVUHS Medical Group; Reynolds Memorial Hospital; Berkeley Medical Center; Jefferson Medical Center; Potomac Valley Hospital of W.Va., Inc.; United Summit Center; United Hospital Center, Inc.; Wheeling Hospital, Inc.; Barnesville Hospital Association; Harrison Community Hospital, Inc.; United Physician's Care, Inc.; St. Joseph's Hospital of Buckhannon, Inc.; Camden-Clark Memorial Hospital Corporation; Camden-Clark Physician Corporation; Braxton County Memorial Hospital, Inc.; Jackson General Hospital; Wetzel County Hospital; Uniontown Hospital; Allied Health Services, Inc.; West Virginia United Insurance Services, Inc.; Accountable Care Organization of West Virginia, LLC(ACO); AHS, LLC; Gateway Home Health Care, LLC; Peak Health Holdings, LLC; Garrett Regional Medical Center; Princeton Community Hospital Association, Inc.; Grant Memorial Hospital, Inc.; and Thomas Health System, Inc.

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1. The intake phone call or online report will be received by a contracted service and the following information will be obtained :
  - Name or location of the facility
  - Date of the call
  - Any relevant information concerning the allegations
  - Name of caller (unless anonymous)
  - Contact phone number for caller (unless anonymous)
2. The information received from the intake phone call is documented and forwarded to the WVUHS Chief Compliance Officer and/or the Compliance Officer at the applicable entity.
3. The Compliance Officer will examine the case and determine what questions must be answered to achieve a resolution. The Compliance Officer may consult with others, as appropriate. If there is any doubt as to the appropriate questions to be answered or if the case raises unusual or especially vexing issues, the Compliance Officer may coordinate the investigation with the General Counsel of WVUHS.
4. Based upon the review of the call/inquiry details, the Compliance Officer will make recommendations regarding the appropriate personnel to investigate the matter. The following guidelines, while not all inclusive, are provided: (1) for any matter that appears to involve criminal liability to the facility or entity or substantial civil liability consideration should be given to forwarding it to legal counsel (in house or outside retained counsel) for an attorney-client privileged investigation; (2) for matters involving quality of care issues, consideration should be given to forwarding it to the department director of the involved area (3) for matters involving coding and financial matters, consideration should be given to forwarding it to the Health Information Management Department or the Patient Financial Services Department; (4) for employee relations matters, consideration should be given to forwarding it the Department of Human Resources; (5) recommendations for the use of other staff elements will be made as appropriate; (6) for reported or suspected privacy issues or breaches, consideration should be given to forwarding it to the Privacy Officer. Except for attorney-client privileged investigations, internal staff will be used if they are available and possess the necessary knowledge and experience to properly conduct the investigation.
5. The results of the investigation, including any disciplinary or corrective action, should be documented and reported as necessary to senior leadership and/or the applicable board or board committees.
6. Cases that may be considered for self-reporting by WVUHS or an affiliated entity will be discussed with the appropriate management and legal personnel prior to any self-reporting.

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