

Integrity Hotline

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Approved By: Executive Compliance Committee

1.0 Purpose

This policy establishes a toll-free hotline. This hotline can be used by anyone to anonymously or confidentially report any issue or concern including suspected misconduct.

2.0 Scope

This policy applies to all workforce members, to our patients and any other member of the public. Any person may call our Hotline.

3.0 Policy

3.1 Every workforce member is required to promptly report "events" or suspected misconduct. . For more details, see our Compliance – Event Reporting policy, #8060-002.

3.1.1 If you are not comfortable reporting to us directly, you can anonymously (*without identifying who you are*) report by calling our Integrity Hotline (the "Hotline"). You can also use the Hotline if you have reported directly, and you are not satisfied with the response you received. The Hotline's toll-free phone number is **877.474.1363**.

3.2 Our Hotline can also be used to report ANYTHING, including to seek guidance on any topic, issue or concern.

3.3 We do not permit retaliation against any person who, in good-faith, makes any report or raises any concerns or issues.

4.0 Related Laws, Regulations, Polices, or Procedures

- 4.1 The Caller. The caller may identify themselves or remain anonymous; if you call the Hotline, you are not required to provide any identifying information.
- 4.1.1 The caller explains to the operator his/her concern; the operator may ask the caller additional questions to get as much information as possible.
- 4.2 The Hotline Operators. The Hotline is answered by a live operator, trained to accept reports, 24 hours/day, and seven days/week. These operators work for an independent, third party company. If you direct, this company (its operators) will not share any identifying information you give them with LMH Health.
- 4.2.1 The operator does not record, trace, or otherwise attempt to identify a caller; and the toll free number is unique to LMH Health.
- 4.2.2 At the conclusion of the conversation, the caller is given a call back date and a report number. On or after the call back date, the caller can call the Hotline and provide the number to follow up on their report.
- 4.2.3 After the initial call is complete, the operator assigns the report a severity level, and completes the report. The company uploads the report to the Hotline's database, and sends an e-mail to the LMH Health Compliance Officer and the Risk Manager. The email includes details of the concern being reported, as well as the call back date and report number.
- 4.2.3 The severity levels are: **Level 1 reports** (Priority - immediate urgency) will be e-mailed within 10 minutes of the end of the call, with a call back period of 24 hours; **Level 2 reports** (High - moderate urgency) will be e-mailed within 24 hours of the call, with a call back period of 48 hours; or **Level 3 reports** (Normal - immediate threat not detected) will be e-mailed within 24 hours, with a call back period of three to four weeks.
- 4.3 Our Response.
- 4.3.1 We review all reports made to the Hotline.

4.3.2 Every call to the Hotline receives a response. Once we complete our review or investigation, the Compliance Officer will:

If the report is anonymous, send our response to the Hotline before the call back date. This allows the caller to get feedback, if they so choose. The Compliance Officer may indicate in the response that more information is needed to complete an investigation and will include specific questions and information needed to continue investigating the report.

If the report includes a caller’s contact information, contact the caller and provide a response before the call back date by using the contact instructions provided in the report. If necessary, the caller will be told that we require more time to complete our investigation.

4.4 References. U.S. Sentencing Guidelines Manual § 8B2.1

5.0 Definitions

5.1 **Integrity Hotline** means the part of our disclosure program, which allows you to ask questions or report events without giving out your name.

5.2 **Workforce Members** has the meaning given by our Corporate Compliance Program policy, #8060-003. Generally, it means everyone.

6.0 Sanctions

All workforce members and agents are expected to perform in a manner consistent with LMH's Purpose, Values, and Policies. When this does not occur, corrective action may result, up to and including termination.

7.0 Questions/Waivers

Questions regarding this policy should be directed to Human Resources, Risk Management or the Compliance & Privacy Officer.

8.0 Document History

Rev	Date	Approved By	Comment

0	05/01/2004		Creation of Original Document
1	12/01/2006		Reviewed
2	11/2009	Compliance Officer & Compliance Policy Subcommittee	Reviewed
3	04/2013	Compliance Officer & Compliance Policy Subcommittee	Reviewed
4	01/2016	Compliance Officer & Compliance Policy Subcommittee	Reviewed
5	02/2018	Compliance Officer & Compliance Policy Subcommittee	Reviewed
6	04/28/2021	Compliance Committee, Compliance Officer	Revised
7	11/12/2024	Executive Compliance Committee	Revised