
Subject	Compliance Hotline
Index Number	GL-3000
Section	Compliance and Ethics
Subsection	General
Category	Corporate
Contact	Adank, Kari B
Effective Date	9/9/2020
Next Revision Date	9/9/2023

References

Gundersen Health System *Compliance Program and Standards of Conduct*

Applicable To

This policy applies to Gundersen Health System and its wholly controlled subsidiaries and affiliates (hereinafter each referred to as “Affiliate”) and any other entity or organization in which Gundersen Health System or an Affiliate has greater than 50% control (hereinafter collectively referred to as “Gundersen”)

Purpose Statement

Consistent with applicable federal guidelines, Gundersen has established a Compliance Hotline to facilitate efforts by employees, patients and members of the community to report actual or potential compliance violations.

Definitions

Not applicable.

Implementation

Compliance Hotline E-Mail:

Gladiator (Gundersen's Intranet), access the Compliance Hotline link under the Regulatory Section

Compliance Hotline Telephone Numbers:

Compliance Hotline Number (877) 532-8879

Compliance Hotline Local Number (608) 784-0477

Contact Information:

Kari Adank, Vice President, Compliance, Ext. 58025

Taryn Zubich, Director of Compliance, Ext. 51510

Peter Weidenheim, Director of Compliance (WI & IA Critical Access Hospitals), Ext. 64127

Dan Lilly, General Counsel, Ext. 54615

Compliance Hotline Telephone Calls During Regular Business Hours:

The Compliance Hotline Telephone will be monitored and answered between 8:00 a.m. and 5:00 p.m. by the Vice President, Compliance, Director of Compliance and other Compliance Office staff. Voice mail will be available and, if possible, telephone calls will be returned the same day.

Compliance Hotline Telephone Calls After Regular Business Hours:

Callers will be asked to leave confidential voice mail messages concerning actual or potential compliance violations. The voice mail system will be checked each regular business day for voice mail messages. If a caller leaves a contact number, the Gundersen Vice President, Compliance, a Director of Compliance or another Compliance Office staff member will attempt to contact the caller within 24 hours after the call is received.

Voice Mail Messages:

The voice mail message for the Compliance Hotline will include substantially the following message:

"You have reached the Gundersen Compliance Hotline. Our regular business hours are Monday through Friday from 8:00 a.m. to 5:00 p.m. The Compliance Hotline is designed to provide a confidential reporting system for our employees, patients and members of the community. We are unable to take your call at this time, but we encourage you to leave a detailed message so that your concerns may be addressed. We will return your call as soon as possible. Each concern will be investigated and you may follow-up on the progress of the investigation using the Compliance Hotline. If you would prefer not to leave your name, please leave a detailed message with a randomly selected four-digit number. This four-digit number can be used to track your complaint if you chose to follow up on your concerns."

Responsibilities

Intake Process:

The following information shall be obtained and documented in the Compliance Database:

1. Assign a file number to each call. The caller may be given the file number to use to obtain information regarding the investigation. If file number provided to caller, this number shall be documented.
2. The date and time of the call.
3. The name of the Compliance Office staff taking the call.
3. The name of the caller and the caller's telephone number (unless anonymous).
4. The name of the Gundersen facility or department involved.
5. Detailed information concerning the suspected violation.
6. A request for documentation that supports the caller's belief that there is an actual or potential compliance problem.
7. Requested follow-up from the caller.
8. Instructions given to the caller.

Compliance Hotline Log:

An entry will be made in the Compliance Database for each report received. The information obtained during the above intake process as well as the following information shall be documented in the Compliance Database:

1. Caller's name or anonymous identification number.
2. Brief description of issue.

3. The preliminary plan for reviewing the actual or potential compliance problem, including the person assigned to investigate.
4. Person assigned to investigate.
5. The results of the investigation.
6. The date the investigation was completed.
7. Brief description of outcome.