

Mercycare Service Corporation	Corporate Compliance Program
Category: Compliance/Legal	
Policy Title: Reporting of Legal and Regulatory Issues	

PURPOSE

The purpose of this policy is to notify employees and staff of Mercycare Service Corporation and its Affiliates of their responsibilities in reporting perceived legal and regulatory compliance issues under the Corporate Compliance Program and to outline how the reporting may be done.

POLICY STATEMENT

It is the responsibility of each employee and staff member of Mercycare Service Corporation and its Affiliates to report any Reportable Compliance Issues that he or she may perceive as questionable. If an employee or staff member believes a reportable compliance issue exists, that employee or staff member must report it as soon as reasonably possible. The sooner an issue is reviewed, the sooner it may be resolved.

DEFINITIONS

A. "Reportable Compliance Issues" shall refer to those legal and regulatory compliance issues that must be reported under this policy, which include, but are not limited to:

1. Quality issues
2. Safety issues
3. EMTALA issues (Emergency Medical Treatment and Active Labor Act)
4. JCAHO issues (Joint Commission on the Accreditation of Health Care Organizations)
5. Scientific Misconduct
6. Billing issues
7. Confidentiality, privacy, and security issues
8. Discrimination
9. Conflicts of interest
10. Concerns with fraud, waste, and/or abuse

B. "Affiliates" shall refer to those wholly-owned subsidiary corporations of MercyCare Service Corporation, which include: Mercy Medical Center, Cedar Rapids, Iowa; Mercy Care Management, Inc., Mercy Physician Associates, Inc.; and Mercy Physician Services, Inc.

GUIDELINES

1. If an employee/staff member believes a Reportable Compliance Issue exists, he/she should first discuss the issue with his/her supervisor.
2. If the employee/staff member is not comfortable discussing the Reportable Compliance Issue with his/her supervisor or does not receive what he/she believes is a satisfactory response, the employee/staff member may take one of the following actions:

Board Approval: May 26, 2005	Reviewed:
Last Update: July 5, 2006 for Telephone Numbers	Page 1 of 3

Mercycare Service Corporation	Corporate Compliance Program
Category: Compliance/Legal	
Policy Title: Reporting of Legal and Regulatory Issues	

2.1. Reporting via telephone

- 2.1.1 Call the Corporate Compliance Officer directly to report any type of perceived Reportable Compliance Issue.
- 2.1.2 Call the Hot Line to report any type of perceived Reportable Compliance Issue. This is a voicemail system only. The employee/staff member may remain anonymous. All the employee/staff member needs to do is outline the issue.
- 2.1.3 Call the HIPAA Security Officer if the perceived Reportable Compliance Issue pertains to security of protected health information.
- 2.1.4 Call the HIPAA Privacy Officer if the perceived Reportable Compliance Issue pertains to privacy of protected health information.
- 2.1.5 The following telephone numbers may be used for internal reporting:
 - Corporate Compliance Officer: 319-398-6451
 - HOT LINE: 319-369-4586
 - HIPAA Security Officer: 319-398-6992
 - HIPAA Privacy Officer: 319-398-6846

2.2 Reporting by sending an e-mail to the Corporate Compliance Officer. The employee/staff member will not be able to remain anonymous with this method, whether he/she uses Meditech or Outlook.

2.3 Reporting in writing. Reporting forms are available in the Meditech library. These are found under the compliance policies, which are located in the hospital policies drawer. These forms can be printed and signed or may be submitted anonymously. The completed form should be submitted to the Corporate Responsibility Officer.

3. Following investigation of a perceived Reportable Compliance Issue, Mercycare Service Corporation and its Affiliates will self report to outside agencies as required by law.

4. If an employee/staff member desires to report the perceived Reportable Compliance Issue to an outside agency him/herself, the following addresses and telephone numbers may be used.

The Iowa Department of Inspections and Appeals

Lucas State Office Building
Health Facilities Division
Des Moines, IA 50319-0083
Phone: 515-242-6515

Board Approval: May 26, 2005	Reviewed:
Last Update: July 5, 2006 for Telephone Numbers	Page 2 of 3

Mercycare Service Corporation	Corporate Compliance Program
Category: Compliance/Legal	
Policy Title: Reporting of Legal and Regulatory Issues	

State of Iowa Long-term Care Ombudsman

Department of Elder Affairs
 Clemons Bldg., 3rd Floor
 200 10th St.
 Des Moines, IA 50309-3609
 Phone: 1-800-532-3213

Region VII Office for Civil Rights

(Privacy Violations or Discrimination)
 Office for Civil Rights
 U.S. Department of Health & Human Services
 601 East 12th Street – Room 248
 Kansas City, MO 64106
 Phone: 1-816-426-7278
 Fax: 1-816-426-3686

Office of Inspector General

Department of Health and Human Services
 Attn.: HOTLINE
 330 Independence Ave., SW
 Washington, DC 20201
 Phone: 1-800-HHS-TIPS (1-800-447-8477)
 Fax: 1-800-223-8164
 E-Mail: HHSTips@oig.hhs.gov

Joint Commission on Accreditation of Healthcare Organizations

E-mail: complaint@jcaho.org
 Fax: Office of Quality Monitoring
 630-792-5636
 Mail: Office of Quality Monitoring
 Joint Commission on Accreditation of Healthcare Organizations
 One Renaissance Boulevard
 Oakbrook Terrace, IL 60180

5. **ANTI-RETALIATION** - There will be no retaliatory action taken by Mercycare Service Corporation or its Affiliates against any employee/staff member that reports perceived Reportable Compliance Issues, whether to an internal resource or to an outside regulatory agency, just because the employee/staff member made such report.

In addition, the Office of Inspector General of the Department of Human Services provides protection for whistleblowers who feel they have been harmed by reporting a perceived Reportable Compliance Issue to an outside agency.

Board Approval: May 26, 2005	Reviewed:
Last Update: July 5, 2006 for Telephone Numbers	Page 3 of 3