

POLICY INFORMATION

Policy Title: Helpline Operation Policy and Procedure

Departmental Owner: Chief Compliance, Audit, and Privacy Officer

Version Effective Date: 12/12/2023

Last Reviewed: 12/12/2023

SCOPE

This policy applies to the following individuals and/or groups:

All of the below categories

All Employees CT Employees NY Employees Remote Employees Contractors Volunteers Students/Interns Vendors

This policy applies to all above listed Nuvance Health workforce members including but not limited to the following locations:

All of the below entities

Nuvance Health Systems

Danbury Hospital (including New Milford Hospital Campus)

Northern Dutchess Hospital

Norwalk Hospital

Putnam Hospital

Sharon Hospital

Vassar Brothers Medical Center

Health Quest Systems, Inc. "(HQSI)"

Health Quest Home Care, Inc

Hudson Valley Cardiovascular Practice, P.C. (aka The Heart Center) ("HVCP")

Other HQSI-affiliated Entities Not Listed

Western Connecticut Home Care, Inc ("WCHN")

Western Connecticut Health Network Physician Hospital Organization ACO, Inc.

Western Connecticut Home Care, Inc

Other WCHN-affiliated Entities Not Listed

Nuvance Health Medical Practices (NHMP PC, NHMP CT, ENYMS & HVCP)

POLICY STATEMENT/PURPOSE

To establish a procedure for the confidential and anonymous reporting of compliance issues and concerns through the establishment of a toll-free confidential and anonymous Nuvance Health ("Nuvance") Compliance and Ethics Helpline ("Helpline").

DEFINITIONS

Covered Individual: This term refers to all Nuvance Health workforce members, business affiliates, and agents. Workforce members shall include any of the following individuals at Nuvance Health: Members of the Nuvance Health Board and the boards of any Nuvance Health related entity; President/Chief Executive Officer; administrators; managers, officers; employees, affiliates; medical staff members; appointees; volunteers; personnel; interns; students, trainees, and any individual whose conduct is under direct control of Nuvance Health whether or not they are paid by Nuvance Health. Business Affiliates shall include any non-workforce member, contractor, independent contractor, vendor, person, subcontractor or third-party, who or that, in acting on behalf of Nuvance Health: (i) delivers, furnishes, prescribes, directs, orders, authorizes, or otherwise provides Federal healthcare program items and services; (ii) performs billing or coding functions; (iii) contributes to Nuvance Health's entitlement to payment under Federal healthcare programs; and (iv) is affected by one or more of Nuvance Health's risk areas through the Business Affiliate's interaction with, or performance of their role, functions, and responsibilities or provision of contracted services at Nuvance Health. Agents include individuals or entities that have entered into an agency relationship with Nuvance Health.

Agents fall under the category of either Workforce Member or Business Affiliate depending on their role, functions, and responsibilities.

POLICY

1. At Nuvance we hold the highest level of value and respect for our patients, workforce members, and affiliated business personnel. Accordingly, Nuvance is committed to delivering patient care services and conducting its business initiatives in an ethical and legally compliant manner with integrity being at the cornerstone of our mission and strategic goals. All Nuvance workforce members, business affiliates, and agents (collectively “Covered Individuals”) are expected to assist Nuvance in its compliance efforts by utilizing the following toll free confidential and anonymous Helpline to promptly report compliance issues, concerns, or incidents that they become aware of: 1-844-395-9331 or 1-844-YES-WECOMPLY. Anonymous and confidential reports may also be made online at: www.nuvancehealth.ethicspoint.com
2. Nuvance protects whistleblowers and has established internal policies that strictly prohibit retaliation of any kind against individual or entities who, in good faith, make a compliance report.
3. All Covered Individuals are required to report conduct involving any of the following prohibited activities:
 - a. Issues or concerns regarding fraud, waste and abuse, conflicts of interests, and standards of conduct including, without limitation, the following:
 - Improper coding, billing or accounting;
 - Improper patient referrals;
 - Theft or misappropriation of Nuvance assets or government funds;
 - Acceptance or offering of inappropriate gifts or gratuities;
 - Inappropriate business arrangements;
 - Actual or potential conflicts of interest;
 - Actual or suspected violations of Federal or State law or Nuvance’s internal policies and procedures including, without limitation, Nuvance’s standards of conduct;
 - Failure to comply with Federal healthcare program conditions of participation or private payor requirements;
 - Failure to report and return overpayments and implement corrective measures to reduce the likelihood of future overpayments; and
 - Employing or contracting with an Excluded or Ineligible Person or Entity.
 - b. Issues or concerns regarding privacy and security of patient, employee, and other confidential information including, without limitation, the following:
 - Inappropriate access, use, disclosure, or disposition of confidential patient, workforce member or business information; and
 - Violations of Nuvance HIPAA, information technology or record management policies and procedures.

- c. Issues or concerns regarding medical necessity, quality of care, and patient rights including, without limitation, the following:
- Patient harassment, discrimination, abuse or other patient rights violations;
 - Preventable adverse patient events;
 - Human subject research misconduct;
 - Providing substandard, unsafe, or medically unnecessary patient care;
 - Providing medical services to patients without being duly credentialed or privileged; and
 - Failure to maintain sufficient medical record documentation to support services provided.
- d. Issues or concerns regarding environmental and workplace safety and the protection of human resources including, without limitation, the following:
- Workforce member harassment including, without limitation sexual harassment;
 - Workplace incivility or conduct that amounts to a hostile work environment;
 - Environmental hazards and other safety concerns;
 - Conduct that endangers the safety of the Nuvance workforce;
 - The improper handling and/or disposal of medical waste, sharps, pharmaceuticals or radioactive or other toxic substances; and
 - Workforce member discrimination.

PROCEDURE

1. The Corporate Compliance Office shall establish and maintain a Compliance Helpline that is: (i) administered through an independent company; (ii) available 24 hours a day, seven days a week, and 365 days a year; and (iii) allows for the anonymous reporting of compliance issues or concerns by Covered Individuals, patients, and other Nuvance stakeholders.
2. Reporters will be advised that information will remain confidential, to the extent permissible under applicable Federal and State law and Nuvance's internal policies and procedures.
3. Reporters may provide their name and contact telephone number so that the Corporate Compliance Office can conduct a complete and thorough investigation. Notwithstanding, Reporters shall be advised that they may choose to remain anonymous.
4. If additional information is required, the Corporate Compliance Office will contact the Reporter, if identified, to obtain the additional information. This process will remain as discreet as possible.
5. If the Reporter is anonymous, the Corporate Compliance Office may submit follow up questions through the anonymous portal. If no response is received, the report will be evaluated to determine if the case can be investigated without obtaining additional information. If it is determined that an anonymous report cannot be investigated with the information provided, the matter shall be closed, and reopened if additional information is received.

APPROVAL

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Jared B Gaynor
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12/19/2023

Signature

Date