

<b>RESPONSIBLE DEPARTMENT: CORPORATE COMPLIANCE</b>	<b>SUBJECT: REPORTING &amp; RESPONSE SYSTEM POLICY</b>
<b>NUMBER OF PAGES: 2</b>	<b>REPLACES POLICY: 10/2017</b>
<b>EFFECTIVE DATE: JANUARY 2024</b>	<b>POLICY ID. ADM-CC</b>

**SCOPE:**

The scope of this policy includes any visitor to the Hospital wishing to access the internal network or Internet through the Hospital's infrastructure, and covers both wired and wireless connections. This scope excludes guests accessing wireless broadband accounts directly through a cellular carrier or third party where the traffic does not traverse the Hospital's network.

**PURPOSE:**

The purpose of this policy is for Community Memorial Hospital employees and agents be knowledgeable about the procedures for reporting a potential non-compliant activity and maintain an open line of communication to the Corporate Compliance Officer.

**POLICY STATEMENT:**

As part of our Corporate Compliance Program, Community Memorial Hospital (CMH) has developed and publicized a reporting system whereby employees and agents can pose compliance-related questions and/or report perceived “non-compliance” by others within the organization anonymously and/or confidentially without fear of retribution or adverse consequences. Non-compliance is defined as failure to comply with applicable Federal and state laws and requirements of Federal and state health programs (including, but not limited to, Medicare and Medicaid, regulations and various interpretations which apply to Community Memorial Hospital).

All employees and agents are encouraged to promptly report all instances of perceived non-compliance for which there is a reasonable indication that non-compliance has occurred. Consequently, CMH will promptly investigate reports received in a thorough manner. The Corporate Compliance Officer should retain all records of any subsequent investigation of reported non-compliance matters in confidence until such time that the investigation may require disclosure of the reporting person in accordance with Federal and state law.

**PROCEDURE:**

1. Employees and agents should call **315-824-7016** to leave a message on the Compliance Hotline. This Hotline is secure and located in the Corporate Compliance Officer’s office. Only the Corporate Compliance Officer has access to this Hotline.
2. The Compliance Officer will listen to any reports on a weekly basis and will initiate a response within ten business days.
3. Employees and agents may also contact the Corporate Compliance Officer (onsite) at **ext. 7064** or a Member of the Corporate Compliance Committee directly by phone or schedule an appointment to pose a compliance-related question and/or report any potential non-compliant incident.

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**Corporate Compliance Officer's Response**

1. Once a report has been received, the Corporate Compliance Officer will review the available evidence and undertake an appropriate inquiry process and investigate. See the Internal Investigation policy.

**DOCUMENTATION: APPLIES TO COMMUNITY MEMORIAL HOSPITAL EMPLOYEES, VENDORS, PHYSICIANS, AND VOLUNTEERS**

**DEFINITIONS: NOT APPLICABLE**

**REFERENCES: NOT APPLICABLE**

Approved by:



Jeffery Coakley  
President and Chief Executive Officer



Cindy Pelky, BS RN  
Corporate Compliance Officer