

## ORGANIZATION POLICY

POLICY TITLE: HOTLINE OPERATIONS

POLICY NUMBER: 1201

Onslow Memorial Hospital utilizes a toll-free telephone service (“Hotline”) operated by an independent agency to provide an avenue for employees or interested parties to report suspected improper, illegal or unethical conduct occurring within the organization. This Hotline is an integral part of the Corporate Compliance Program as it may detect violations of the Corporate Standards of Conduct, Hospital Policies and Procedures, as well as applicable laws and regulations. Callers using the Hotline may remain anonymous. In the event that any caller chooses to disclose his/her identity, such information will be held in confidence to the fullest extent practical or allowed by law. No retribution or retaliatory actions may be taken against the caller for reporting violations on the Hotline.

### I. Corporate Compliance Officer

The Corporate Compliance Officer shall be charged with the following responsibilities in the operation of the Hotline:

- Ensuring proper Hotline functioning
- Conducting appropriate investigations and follow up in response to Hotline calls
- Providing feedback to callers when appropriate
- Reporting Hotline activity to appropriate committees or Senior Management when needed
- Maintaining documentation
- Assuring all necessary actions have been taken to resolve an issue raised by a Hotline caller

### II. Hotline Operations

The telephone number to the Hotline call center is: (866) 631-5718. The Hotline will be available twenty-four hours a day, seven days a week, and three hundred and sixty-five days a year.

All calls to the Hotline will be answered by a professional compliance risk specialist who will document the caller’s concerns, and provide the caller with a uniquely assigned compliance report number and a date to call back and check the status of the matter reported.

Within minutes of the completion of the call, members of OMH Corporate Compliance Program are notified via electronic communication with a detailed report of the information recorded by the Hotline call center professional. In the event of an emergency, members of OMH Corporate Compliance Program will be immediately contacted via telephone, regardless of the day and time of the call.

Following the receipt of the Hotline report, the matter is assigned to a member of OMH Corporate Compliance Program to conduct an investigation. Following the completion of the investigation, the matter is thoroughly analyzed by OMH Corporate Compliance including Compliance Counsel. As soon as possible, OMH Corporate Compliance will alert Hospital Administration of any suspected improper, illegal or unethical conduct so that such conduct can be immediately addressed in an appropriate fashion.

OMH Corporate Compliance will prepare a follow up response to all Hotline reports. The Hotline response will be transmitted to the Hotline call center so that is available for relaying to the caller on the assigned call back date.

EFFECTIVE DATE: January 23, 2001

REVIEW DATE: May 2011, January 2012, January 2015  
January 2018

REVISION DATE: November 2004, May 2008

APPROVED BY: \_\_\_\_\_  
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Signed Original in Executive Office