

# Healthcare Compliance Forms and Tools

## Sample Corporate Compliance Helpline Policy

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By Greg Radinsky, JD, MBA, CHC, CCEP

[Facility Name]	
Policy Title: Corporate Compliance Helpline	Administrative Policy and Procedure Manual
Policy Number: [NUMBER]	Category: Corporate Compliance
System Approval Date: [DATE]	Effective Date: [DATE]
Site Implementation Date: [DATE]	Last Reviewed/Revised: [DATE]
Prepared by: Office of Corporate Compliance	Superseded Policy(s)/Number(s): N/A

### General Statement of Purpose

[ORGANIZATION NAME] is committed to the timely identification and resolution of all issues that may adversely affect employees, patients, or the organization. Therefore, [ORGANIZATION NAME] has established communication channels to report problems and concerns, including a Corporate Compliance Helpline number [PHONE NUMBER] and website [WEBSITE ADDRESS]. The Helpline is available 24 hours, seven days a week. Individuals are encouraged to report any problem or concern either anonymously or in confidence via the Helpline as they deem appropriate. Individuals also have the option of contacting the Office of Corporate Compliance directly via telephone at [PHONE NUMBER] or fax at [FAX NUMBER] during regular business hours or in-person at [ORGANIZATION NAME].

The Corporate Compliance Helpline is an avenue by which individuals or interested parties may report any issue or question associated with any of the [ORGANIZATION NAME]'s policies, conduct, practices, or procedures believed by the individual to be a potential violation of criminal, civil, or administrative law, or any unethical conduct.

All individuals are protected from nonintimidation and nonretaliation for good faith participation in [ORGANIZATION NAME]'s Compliance Program. Failure to report a compliance issue may be grounds for disciplinary action.

Examples of potential compliance issues include, but are not limited to:

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- Inappropriate coding
- Inappropriate charging/billing
- Inappropriate charge code selection/chargemaster
- Inappropriate claims submission
- Overpayments
- Medical necessity issues
- Cost-reporting issues
- False or fraudulent documentation issues
- Requests from fiscal intermediary/carrier
- HIPAA or patient privacy issues
- EMTALA issues
- Failure to follow policies and procedures
- Failure to follow Code of Ethical Conduct
- Drug diversion (i.e., illegal sale or redistribution of drugs)
- Physician relationship issues such as potential violations of the Stark Law or Anti-Kickback Statute
- Potential violations of the Anti-Kickback Statute related to vendors (e.g., inappropriate gifts)
- Provider or supplier excluded from the federal or state healthcare programs
- Inappropriate conflict of interest
- Retaliation or intimidation

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