

POLICY INFORMATION

Policy Title: Helpline Operation Policy and Procedure

Departmental Owner: Chief Compliance, Audit, and Privacy Officer

Version Effective Date: March 7, 2025

Last Reviewed: March 7, 2025

SCOPE

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

All Covered Individuals (e.g., all Nuvance workforce members, business affiliates, and agents) as defined below under Definitions.

This policy applies to all Nuvance Health Covered Individuals 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

For purposes of this policy, the term listed below shall have the following meaning:

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; 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. Business Affiliates shall include certain non-workforce members contractors, independent contractors, vendors, persons, subcontractors or third-parties. Agents include individuals or entities that have entered into an agency relationship with Nuvance.

For the full definition and applicability of Covered Individuals, please refer to the Nuvance Health Compliance and Ethics Program Charter which can be found internally on Ellucid at: [Nuvance Health Compliance and Ethics Program Charter](#), or externally at <https://www.nuvancehealth.org/NHcomplianceandethicsprogramcharter>.

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;
 - Violations of the Foreign Corrupt Practices Act;
 - Violations of the U.S. Government’s export controls and sanctions laws;
 - Financial statement fraud and other financial wrongdoing;
 - 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;
 - Refusal to cooperate in an internal investigation involving a violation of the Nuvance Compliance and Ethics Program;
 - Fraudulent or corrupt conduct;
 - Embezzlement, bribery, kickbacks, and abuse or misuse of corporate assets;
 - Failure to timely 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, transmission, or disposition of confidential patient, workforce member or business information; and
 - Violations of Nuvance HIPAA (as well as other patient privacy and security policies), information technology, employee privacy 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 or other scientific research-related violations;
 - 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;
 - Engagement in retaliatory conduct;
 - 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

Signed by:

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Signature

3/7/2025

Date