




## CORPORATE POLICY & PROCEDURE

Policy Name: Hotline	
Department: Compliance	Policy Number: CO15
Version: 7	Creation Date: 12/29/2016
Revised Date: 7/18/17, 7/22/19, 1/6/22	Review Date: 1/23/19, 1/16/20, 1/19/21
Line of Business: <input checked="" type="checkbox"/> All <input type="checkbox"/> Umpqua Health Alliance <input type="checkbox"/> Umpqua Health - Newton Creek <input type="checkbox"/> Umpqua Health Management <input type="checkbox"/> Umpqua Health Network	
Signature: 	
Approved By: Michael A. von Arx, CAO & Chief Compliance Officer Date: 1/24/2022	
Approved By: Board Oversight Compliance Committee Date: 1/20/2022	

### POLICY STATEMENT

In order to establish effective lines of communication, Umpqua Health has an open door policy for reporting compliance matters. To help facilitate the communication, Umpqua Health has a hotline that allows individuals to report matters to the Compliance Department anonymously.

### PURPOSE

The purpose of this policy is to outline the requirement for Umpqua Health to maintain a hotline for individuals to report compliance matters, along with the responding and reporting process for hotline reports.

### RESPONSIBILITY

Compliance Department

### DEFINITIONS

Internal Personnel: All Umpqua Health employees, providers, volunteers.

External personnel: Individual contractors, subcontractors, network providers, agents, first tier, downstream, related entities, and their workforce.

Program Integrity Audit and PI Audit: Means, but is not limited to, the review of Medicaid claims for suspicious aberrancies to establish evidence that fraud, waste, or abuse has occurred, is likely to occur, or whether actions of individuals or entities have the potential for resulting in an expenditure of Medicaid funds which is not intended under the provisions of the CCO Contract, State or Federal Medicaid regulations, and whether improper payment has occurred.

Subcontractor: Any individual, entity, facility, or organization, including participating providers, that meet the definition of a subcontractor, that has entered into a subcontract with the UHA or with any subcontractor for any portion of the work under the CCO Contract (CCO Contract, Exhibit A).



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### PROCEDURES

1. In accordance with Exhibit B, Part 9, Sections 11(b)(14) and 12(a)(1)(c)&(d) of Umpqua Health Alliance's Coordinated Care Organization (CCO) Contract with the Oregon Health Authority (OHA) and 42 CFR § 438.608, Umpqua Health has contracted with a third-party vendor to establish a hotline for individuals to report compliance matters.
2. The Compliance Department is tasked with promoting the hotline through various means to the following individuals:
  - a. Internal personnel.
  - b. External personnel.
  - c. Members.
  - d. Patients.
  - e. Patient/Member Representative.
3. Promoting the hotline will include communications outlining the anonymous reporting benefit that the hotline provides.
4. UHA uses a Case Manager Database to receive allegations, track, triage and refer to (i) Medicaid Fraud Control Unit (MFCU)/ OHA Office of Program Integrity (OPI) for fraud or abuse or (ii) to its Compliance Department to investigate, resolve, and refer the final case internally for further compliance, corrective action, or to open a Program Integrity audit to recover overpayments.
  - a. UHA is prohibited from referring allegations to a subcontractor who is also a party to the allegation.
5. Additionally, the Compliance Department will periodically review the effectiveness and availability of the hotline and take necessary actions in the event the hotline becomes unavailable or ineffective.
6. Hotline reports will be reviewed by the Compliance Department and documented in the Compliance Log.
  - a. The Compliance Department will determine whether an investigation is warranted, and if necessary, begin the investigation process.
    - i. If contact information is provided by the reporter, the Compliance Department will reach out to the reporter for more information if necessary.
  - b. In the event, the report is a non-compliance matter (e.g. Human Resources matter), the Compliance Department will document the report in the Compliance Log and note that the information was forwarded to the appropriate department for follow up.
7. The Compliance Department will provide a summary of the volume of hotline calls to the Board Oversight Compliance Committee on a quarterly basis. This Committee will evaluate and ensure that the Compliance Department is appropriately promoting the hotline and ensuring its availability.



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8. The hotline can be accessed through the following means (Can report anonymously):
  - a. Phone: (844) 348-4702
  - b. Online: [www.umpquahealth.ethicspoint.com](http://www.umpquahealth.ethicspoint.com)
9. To further support and encourage reporting, UHA and its parent company, Umpqua Health, has a strict zero-tolerance policy on retaliation (CO9 – Non-Retaliation) to ensure internal personnel, external personnel, and its members are protected from retaliation under applicable whistleblower laws.

Department	Standard Operating Procedure Title	SOP Number	Effective Date	Version Number
Compliance	N/A	N/A	N/A	N/A