

**MOUNT CARMEL  
POLICY/PROCEDURE**

**SUBJECT: INTEGRITY AND COMPLIANCE REPORTING**

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DEPARTMENT OVERSIGHT & MAINTENANCE: Integrity and Compliance

**POLICY:**

All colleagues, medical staff, volunteers, board members, and other persons employed directly by or providing services under the direction of Mount Carmel Health System (MCHS) are responsible for seeking clarification to, asking questions about, and for prompt reporting in good faith of any actual or potential wrongdoing. Questions or reports may involve possible violations of the law, billing errors or issues, patient privacy, information security breaches, clarification of regulations, or violations of policies or procedures. It is our policy to report and investigate concerns about any actual or potential wrongdoing. MCHS prohibits any retribution directed toward an individual for making a good faith report of their concerns.

**RESPONSIBLE**

**PERSONS:** All colleagues, medical staff, volunteers, board members, persons providing services under the direction of MCHS

**PROCEDURE:**

The following process is encouraged to report concerns or to seek further information, but the steps do not have to be done consecutively. Any step can be done independently of the others.

1. Refer to Human Resources or Integrity and Compliance policies that exist within Mount Carmel or contact an immediate supervisor.
2. If not comfortable asking a supervisor or not satisfied with the advice received through existing policies or procedures, contact a higher-level manager or Human Resources.
3. If still not satisfied, contact the MCHS Integrity and Compliance Officer at [IntegrityOfficer@mchs.com](mailto:IntegrityOfficer@mchs.com).
4. If none of the above steps resolves the question or concern, call the 24-hour Integrity Hot Line (Toll Free 1-866-477-4661) to seek assistance.
5. If safety or quality concerns have not been addressed to your satisfaction, or if you prefer, contact The Joint Commission at 1-800-994-6610 or via their website [www.jointcommission.org](http://www.jointcommission.org)

A separate corporation that monitors hot lines for government, private and public organizations maintains the Integrity and Compliance Hot Line. The staff is *not* employed by Trinity Health. As such, Hot Line callers will not be speaking with someone from Trinity Health, which allows for greater confidentiality. The Hot line does not use caller ID. All calls are treated confidentially and callers may remain anonymous if they so choose. Anonymity may affect the ability for follow up and resolution of the issue.

**REFERENCES:** Standards of Conduct; Integrity and Compliance Program, Trinity Integrity Reporting System Policy 8-03

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DEVELOPED BY: Integrity Council ORIGINAL DATE: 6/98

REVIEW/REVISION DATE: 8/98, 3/00, 7/01, 8/02, 5/03, 6/04, 5/05, 5/06, 7/07, 9/08, 9/09,  
8/11, 8/13, 4/15

REPLACES: Administrative P/P "Integrity and Compliance Reporting"

APPROVED BY: Integrity and Compliance Council 4/24/15

*Cheryl Pitka* 4/29/15  
Integrity and Compliance Officer Date