

## **(1) What is the Compliance Hotline/Helpline?**

The Compliance Hotline/Helpline is a toll free number used to report any business process, decision or situation that you believe violates NHP policy, contracts, regulations or law. The Hotline/Helpline is operated by an independent company and is NOT staffed by any NHP employee.

## **(2) What kinds of concerns should I report to the Compliance Hotline?**

You should report any activity that you reasonably believe to be:

- a practice prohibited by organization policies and procedures, including but not limited to anti-discrimination and confidentiality policies;
- a violation of the terms of any contract we have with the state or any other entity; or
- a violation of any federal or state law or regulation.

## **(3) Do I have to use the Compliance Hotline to report activities that I believe are illegal, unethical or in violation of corporate policies?**

No, the Compliance Hotline is just one of several ways in which you can make a report.

- As a first measure, you are encouraged to report problems and concerns to your immediate manager;

- You may also discuss the issue with a higher level manager in your department or communicate with the Human Resource Department if you feel that your concerns are not being addressed appropriately;
- You may communicate directly with the Vice President of Quality and Compliance (x7432) or the Director of Quality and Compliance (x7449); or
- You may report your concerns to the Compliance Hotline/Helpline.

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## **Compliance Hotline Number 1-800-826-6762**

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## **(4) What if I don't want my identity to be known?**

If you do not want your identity to be known, your best option is to report your concern anonymously (do not give your name) to the Compliance Hotline/Helpline which is available 7 days/week, 24 hours/day. If you give your name and request that it remain confidential, the Hotline/Helpline staff will not divulge your identity unless required to do so by law.

## **(5) What will happen to me if my supervisor finds out that I reported him or her to the Compliance Hotline?**

Employees who report problems and concerns in good faith will not be subjected to any form of retaliation or retribution. If

this occurred this would be viewed as a very serious violation of NHP's policies and would be addressed immediately.

## **(6) Do I have an obligation to report instances of non-compliance?**

Yes. All employees of NHP have a duty and responsibility for reporting perceived misconduct, including actual or potential violations of laws, regulations, policies, procedures or the organization's code of conduct.

## **(7) What happens with the information that I report to the Compliance Hotline/Helpline?**

The information is gathered by a trained interviewer and is promptly reported to NHP without identifying the caller if confidentiality was requested. An NHP manager will be assigned to investigate the matter. All reported issues are summarized, trended and reported to the Executive Committee and the Board of Directors.

## **(8) What if I am not sure that the activity I am questioning should be reported?**

You should still report your concern through one of the established channels. This will enable NHP to determine if the matter warrants further investigation.

Dear NHP Employee

*As part of NHP's overall Corporate Compliance Program I am pleased to introduce our Compliance Hotline/Helpline for employees who wish to report suspected violations of NHP's standards or policies or any federal or state law or regulation. As the name suggests, this is not just a Hotline for making reports but is also a Helpline from which you can receive guidance and direction on any questions you may have about compliance matters.*

*The Compliance Hotline/Helpline is just one of several ways in which you can make known your concerns regarding any compliance related manner. I strongly encourage you to report any suspected violations to your supervisor, manager, human resource staff, NHP's Office of Compliance or directly to me. You may also use the Compliance Hotline/Helpline to make a report, especially if you wish to remain anonymous. Remember, the Compliance Hotline/Helpline is operated by an organization outside of NHP and will respect your request for confidentiality.*

*Thank you for your continued support and work to meet our mission with high quality service to our members, providers and the public.*

*Sincerely,  
Jim Hooley  
CEO*

#### Phone Numbers

Jim Hooley CEO	772-5701
Pam Siren VP Quality & Compliance	428-7432
Richard Dropski Director Quality & Compliance	428-7449
Rey Spadoni Privacy Officer	772-5681
Roberta Goldman-Wilkinson Director, Human Resource Department	428-7411
Compliance Hotline	1-800-826-6762

Qualityandcompliance@nhp.org

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HOTLINE/HELPLINE**

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