

DEPARTMENT: Ethics and Compliance	POLICY DESCRIPTION: Internal Handling of Reports to the Ethics Line
PAGE: 1 of 5	REPLACES POLICY DATED: 1/21/98, 7/8/98, 11/9/99, 1/1/06, 3/1/14, 10/1/20
EFFECTIVE DATE: February 1, 2023	REFERENCE NUMBER: EC.002
APPROVED BY: Ethics and Compliance Policy Committee	

<p>SCOPE: This policy and procedure applies to HCA Healthcare Ethics Line.</p>
<p>PURPOSE: To establish protocols for the manner in which HCA Healthcare Ethics Line manages reports and investigations of ethics or compliance concerns.</p>
<p>POLICY:</p> <ol style="list-style-type: none"> 1. Reports made to the Ethics Line will be managed in a manner that preserves the confidentiality of the reporter and individuals involved in the investigation. 2. Reports made to the Ethics Line will be investigated and closed within 30 days of receipt, under most circumstances. 3. Reports made to the Ethics Line will be investigated by persons having a sufficient level of expertise or knowledge with regard to the issue(s) presented by the reporter. 4. Disciplinary or corrective action in response to substantiated allegations will be an integral part of the Ethics Line program.
<p>PROCEDURE:</p> <p>A. Scope of the Ethics Line The Ethics Line manages ethics or compliance related concerns that may be reported verbally or in writing through:</p> <ol style="list-style-type: none"> 1. The “Call Center,” a toll-free phone number (1-800-455-1996), which is managed by a third party administrator; 2. The HCA Healthcare Corporate Ethics and Compliance department; 3. The HCA Healthcare Ethics Line online portal (https://hcahealthcareethicsline.ethix360.com/); 4. The HCA Healthcare external website; and/or 5. Other HCA Healthcare corporate departments. <p>B. Intake of Reports to the Ethics Line</p> <ol style="list-style-type: none"> 1. Telephone calls to the Ethics Line will be received by the Call Center, when made to the toll-free number or a representative of the Ethics Line when made to Corporate Ethics and Compliance. For each call, the following information must be obtained from the reporter: <ol style="list-style-type: none"> a. Name or location of the Facility or business unit involved; b. Date of the report; c. Any relevant information concerning the allegations; d. Name of reporter (unless the reporter has requested anonymity); and e. Contact phone number or email for the reporter.

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2. Written submissions to the HCA Healthcare Ethics Line online portal or the HCA Healthcare external website or other correspondence sent to the corporate office will be reviewed for sufficiency upon receipt. If contact information is made available, an Ethics Line representative will contact the reporter within two (2) business days of receipt to obtain additional information regarding the submission.
3. Each case will be assigned a case number generated by the Ethics Line case management system and assigned to the appropriate Case Manager, if applicable.

C. Anonymous or Confidential Reports to the Ethics Line

1. If an anonymous report is made to the Call Center or through the HCA Healthcare online portal, the reporter will be provided a unique case number, generated by the Ethics Line case management system with instructions for obtaining information regarding the disposition of the case. For all other anonymous reports to the Ethics Line, to the extent contact information has been provided by the reporter, efforts will be made to obtain additional information to conduct an investigation, as needed.
2. If the reporter's identity is disclosed to the Ethics Line, but the reporter desires anonymity throughout the investigation, then efforts will be made to preserve the confidentiality of the reporter. Some cases will be difficult to investigate without disclosing the identity of the reporter. In such situations, the reporter will be asked whether their identity may be disclosed in connection with the investigation. If the reporter is unwilling to allow their identity to be disclosed in connection with the investigation, the difficulties of conducting an investigation without disclosing their identity should be explained to the reporter. However, in such circumstances, the wishes of the reporter must be respected.

D. Ethics Line Case Management

1. All information received from the reporter will be documented and entered into the Ethics Line case management system.
2. After receipt of a report, the Ethics Line Coordinator will identify the management team for the Facility or business unit named in the report and prepare an Ethics Line case file, incorporating the appropriate data. If the report relates to a general request for information (e.g., policy interpretation), the request for information will be referred to the appropriate Facility or business unit, if necessary, and an appropriate annotation reflecting this referral will be made in the case file, if applicable.
3. The case file will be assigned to the appropriate Case Manager. Case Managers will be assigned by Facility and business units and responsible for all cases arising out of their respective facilities or business units. Under certain circumstances, an alternate Case Manager or Investigator may be assigned to a case (e.g., staffing prioritization, subject matter expertise).
4. For cases with identified reporters, the Case Manager or designee, will contact the reporter within two (2) business days of receipt of the case. The reporter will be provided with the

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contact information for the Ethics Line representative whom the reporter may contact for future inquires.

5. The Case Manager will review reports submitted to the Ethics Line and determine if additional information is necessary to develop an investigative plan. If additional information is required, the Case Manager will request additional information from the reporter. If the reporter is anonymous, the Case Manager will evaluate the report to determine if the case can be investigated without obtaining additional information from the reporter. If an anonymous report was initiated via the Call Center, the Case Manager will inform the Call Center of nature and scope of the additional information required. If an anonymous report was initiated via the Ethics Line online portal, the Case Manager will post a response in the portal to solicit additional information from the reporter. Unless sufficient information is provided to support an investigation is warranted, the case may be closed without investigation, due to insufficient information.
6. The Case Manager will examine all of the information obtained in connection with the case and determine what questions or concerns must be answered to resolve the case. In determining the questions that must be answered or concerns, which must be addressed, the Case Manager may consult with Responsible Executives or other internal or external resources, as appropriate. If there is any doubt as to the appropriate questions to be answered or if the case raises unusual or especially troubling issues, the Case Manager will consult with the Vice President Ethics and Compliance, responsible for administration and oversight of the Ethics Line.
7. Notwithstanding the above procedures, any detected or reported concerns involving allegations of non-compliance or potential fraud, waste and abuse implicating a Medicare Advantage Organization or Part D plan sponsor (MAO) will be escalated to the Vice President responsible for administration of the Ethics Line. The Vice President will consult with the Senior Vice President for Employer and Payer Engagement, or designee, to report the matter to the MAO in accordance with the participation agreement between the HCA Healthcare affiliated facility, physician practice or business unit and the MAO.

E. Investigations

1. The Case Manager will determine the appropriate personnel to investigate a particular matter (e.g., ECO, VPHR, VPQ) and provide the preliminary instructions for conducting the investigation, using the standard Instructions to Investigator form.
 - a. The Case Manager will consider the breadth of resources available to Corporate, Group, Divisions, Markets, facilities and business units. On occasion, a multi-disciplinary team of investigators may be appropriate for an investigation. Prior to tasking more than one investigator to conduct an investigation, the Case Manager will consult with the Vice President Ethics and Compliance, responsible for the administration and oversight of the Ethics Line.

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- b. Certain concerns reported to the Ethics Line may be referred to another Corporate Department for investigation, including, but not limited to: (1) matters that appear to involve criminal liability to the corporation or substantial civil liability (substantial civil liability determinations will be made by the Vice President, Ethics and Compliance), will be referred to the Vice President, Litigation Counsel; (2) matters involving quality of care concerns will be referred to Clinical Services Group; (3) matters involving medical coding should be referred to Vice President, Regulatory Compliance Support, and Vice President, Internal Audit; and (4) matters implicating The Sarbanes-Oxley Act or impacting company finances should be referred to Vice President, Internal Audit.
 - c. Certain concerns reported to the Ethics Line may be referred to the Facility or business unit CEO or ECO, Division or Market officers, or Group officers or the Ethics Line Investigator for investigation, as appropriate.
 - d. Other company resources at the Corporate, Group, Division, Market, Facility or business unit level may be utilized in an investigation, as appropriate.
 - e. External investigators will only be used or assigned with the express approval of the Vice President with concurrence from the Senior Vice President and Chief Ethics and Compliance Officer.
2. The Case Manager will determine the appropriate amount of time, which ordinarily will not exceed 21 days, to allow for the investigation. Shorter periods may be necessary to ensure, management’s ability to consider the results of the investigation. If a shorter investigative period is necessary, the Case Manager will negotiate the appropriate amount of time to allow for the investigation. Once the amount of time to accomplish the investigation is established, the investigator must complete the investigation within the agreed upon time frame or obtain an extension from the Case Manager.
 3. The Case Manager will decide who should be notified of the existence of an investigation. Under ordinary circumstances, the Facility, business unit, Division, Market or Group management will be informed of the existence of the investigation. However, if it appears that a member of management at such level may be implicated in the investigation, the Vice President, Ethics and Compliance, will be consulted prior to notification to management.
 4. Upon receipt of an Ethics Line case, the investigator should develop a detailed investigative plan, interview appropriate personnel, and review documents and other evidence. The findings of the investigation should be documented in detail and forwarded to the Case Manager. The investigator’s report will include the plan for and status of disciplinary or corrective action, if applicable.
 5. The Case Manager will determine if the initial allegation(s) and any subsequent allegations were sufficiently investigated. If there are deficiencies in the investigation, the Case Manager will immediately contact the investigator and apprise the investigator of the deficiencies. The Case Manager will document in the case file all contacts made related to the investigation.

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6. If the investigation sufficiently resolves all of the allegations, the Case Manager will evaluate the reasonableness of the disposition (e.g., substantiated, unsubstantiated, etc.) and disciplinary or corrective action, if warranted.
7. If there is disagreement between leadership within Ethics and Compliance and other Corporate Departments, Group, Division, Market, Facility or business unit concerning appropriateness of disciplinary or corrective action, the parties will attempt to reach an agreed upon resolution. If the parties are unsuccessful in reaching agreement on the appropriate disciplinary or corrective action, the matter will be referred to the Company's Chief Executive Officer.
8. For each investigation, the Case Manager will prepare a Close-Out Memorandum. The Close-Out Memorandum will summarize the allegations and facts of the case, investigative actions and findings, conclusions, and disciplinary or corrective action, as appropriate. The resolution of the case must be approved by the Senior Vice President and Chief Ethics and Compliance Officer or the Vice President, Ethics and Compliance, responsible for administration and oversight of the Ethics Line, or a designee, based upon criteria to be established from time to time by the Senior Vice President and Chief Ethics and Compliance Officer. Once approval is obtained, the case may be closed. The Close-Out Memorandum will be maintained in the case file and case management system.
9. The Case Manager will inform the reporter of the results of the investigation and the disposition of the case, if possible.
10. The Case Manager will notify the investigator of the final disposition of the case.

REFERENCES: N/A