

St. Luke's Episcopal Health System Policy & Procedure

No. 1.01.40.20.004

Subject/Title: Whistleblower Policy (System)
Effective Date: September 2010
Next Review Date: September 2013
Maintained By: Coordinator Corporate Integrity
Reviewed By: Corporate Integrity Steering Committee
Approved By: Chief Compliance Officer

This policy/procedure rescinds all other policies/procedures and memoranda relating to this subject issued prior to September 2010. St. Luke's Episcopal Health System and pertinent St. Luke's subsidiaries are included and referred to collectively in this policy/procedure as "St. Luke's."

REVISION SUMMARY

Date	Referenced Section(s)	Change
September 2010	Not applicable	Minor edits. Policy renewal only.

PURPOSE

To facilitate reporting of Improper Conduct or Wrongdoing by persons without fear of discrimination, retaliation, or reprisal.

POLICY

St. Luke's supports and protects an employee or other person ("Person") who in good faith reports potential Improper Conduct or Wrongdoing.

DEFINITION(S)

Improper Conduct or Wrongdoing – means serious actions that:

- Are unlawful or not in compliance with laws or regulations to which St. Luke's is subject;
- Do not adhere to St. Luke's policies or contractual obligations;
- Reflect a real or perceived conflict of interest;

- Represent the unauthorized use, misuse, or waste of resources, which may be of tangible or intangible nature;
- Represent a substantial and specific danger to the patient, public health, safety, or the environment;
- Reflect a departure from appropriate St. Luke's accounting policies or procedures, internal accounting controls, or
- Constitute any other unethical or improper conduct or abuse.

PROCEDURES

1.00 Reporting Improper Conduct.

- 1.01 A Person may report a concern to his/her supervisor in accordance with the organizational reporting structure. If the supervisor is unavailable, unresponsive, or perceived to be involved in the matter, the Person may contact the executive over the area.
- 1.02 A Person concerned with possible improper conduct or wrongdoing may call the Integrity Hotline at 1-800-826-6762 at any time (24 hours a day) to report the concern. Callers may choose to remain anonymous, and if so, will be provided a call back number to The Integrity Hotline with a code to identify the call. Although callers can remain anonymous, having the caller's identity may assist with the review process.
- 1.03 A Person concerned with possible improper conduct or wrongdoing may report the concern by accessing the Corporate Compliance Internet reporting option by entering the following address in any web browser and following the instructions:
- www.slehsionline.com
- 1.04 A Person concerned with possible improper conduct or wrongdoing may also report the concern by mail to:
- St. Luke's Episcopal Health System
Corporate Compliance Department
3100 Main, MC 3-121
Houston, TX 77002
- 1.05 If a Person does not believe the existing processes are sufficient or can function as intended, the Person may directly communicate the concern(s) to St. Luke's Corporate Compliance Officer ("Compliance Officer"). The Compliance Officer is independent of St. Luke's executives and reports to St. Luke's Board of Directors.

- 2.00 Concerns Related to the Chief Executive Officer: If a Person has a belief that improper conduct or wrongdoing is, may have or could occur, and the alleged violation involves activities or matters concerning the Chief Executive Officer, then such matters should be reported directly to the Compliance Officer. The Compliance Officer is designated to forward

the report of these matters directly to St. Luke's Board of Directors within 48 hours of the receipt of such report.

- 3.00 Investigations of alleged Improper Conduct or Wrongdoing will be conducted by the Compliance Officer or his/her designee within 30 days, as possible, of the Person's initial contact. Matters relating to professional conduct will be referred to the appropriate professional body for review.
- 4.00 St. Luke's will not take, tolerate or allow any reprisal, harassment or even informal pressure, against a Person who, in good faith, reports Improper Conduct or Wrongdoing. Should the identity of the Person expressing such a concern be known, the Compliance Officer will monitor any disciplinary action against the Person to determine whether it could be retaliation for submission of the concern. Any such retaliation will be considered a breach of this Policy. Individual(s) who attempt an act of retaliation toward the reporting Person may face disciplinary action up to termination of employment or termination of his/her relationship with St. Luke's.
- 5.00 All records and information obtained and collected during an investigation of alleged Improper Conduct or Wrongdoing will remain confidential, except as necessary to conduct a fair investigation, to take required corrective or remedial action, or to comply with applicable law.
- 6.00 Where an investigation determines that the Person's report was made in bad faith or with malicious intent, appropriate disciplinary action may be taken.
- 7.00 Records of Investigations and Complaints.
 - 7.01 Records of the internal investigations will be completed and retained by the Corporate Compliance Department for a period of seven (7) years.
 - 7.02 An aggregate report of confidential complaints will be kept by the Compliance Officer and forwarded to the Board of Directors periodically and upon request.
- 8.00 Accountabilities.
 - 8.01 Corporate Compliance, on behalf of the Board of Directors, is responsible for the maintenance and operation of this Policy.
 - 8.02 When an investigation determines that Improper Conduct or Wrongdoing has occurred, disciplinary action will be taken by Management and/or Human Resources up to and including the termination of employment or the termination of the individual's relationship with St. Luke's. The specific action taken will depend on the nature and gravity of the conduct or activity. Other remediation of the misconduct or wrongdoing will be taken as necessary (i.e. rebilling of claims).
 - 8.03 If alleged Improper Conduct or Wrongdoing relates to a physician, the information will be forwarded to the appropriate party, pursuant to the relevant medical staff by-laws or other governing law.

- 8.04 If a Person is unsatisfied with the action taken regarding his/her concern(s), and feels it is necessary to contract a party external to St. Luke's management personnel, the Person may contact either the Executive Chair of the Board of Directors or the Chair of the Finance and Audit Committee of the Board of Directors.

DOCUMENTATION

- Not applicable.

FORM(S)

- Not applicable.

CROSS-REFERENCE(S)

- Not applicable.