

Anonymous Reporting of Compliance Concerns

Updates Approved by Compliance Committee: 9.6.2023; 9.4.2024; 9.3.2025

Reviewed w/ No Changes:

Revised: 9.3.2025 (updating of reporting information); 8.22.2024 (added webpage)

Purpose

Cayuga Health System (CHS) is committed to the timely identification and resolution of all issues that may adversely affect employees, patients, or the organization. Therefore, Cayuga Health System has established communication channels to report problems and concerns for its entities as follows:

- CMC/SH/CMA Reporting Hotline - 607-274-4170
- CMC/SH/CMA Anonymous Online Reporting – [Cayugahealth.org/corporate-compliance](https://cayugahealth.org/corporate-compliance)
- CARS Reporting Hotline – 855-650-0005
- CARS Anonymous Online Reporting – www.lighthouse-services.com/carsny

Employees are encouraged to report problems or concerns either anonymously or in confidence via the hotline and webpage, contacting the Compliance Officer directly or any member of the Compliance Committee, when they deem appropriate. These methods establish an avenue for employees or interested parties to report suspected criminal activity, and illegal or unethical conduct occurring within the organization in the event other resolution channels are ineffective or the caller wishes to remain anonymous.

Policy

1. Cayuga Health System will establish and maintain a telephone hotline and webpage that employees may use to report problems and concerns either anonymously or in confidence.
2. Employees who report problems and concerns in good faith will be protected from any form of retaliation or retribution.
3. All those who are employed to respond to compliance reports are expected to act with utmost discretion and integrity in assuring that information received is acted upon in a reasonable and proper manner. Everyone who receives or is assigned responsibilities for reports from employees shall agree to maintain strict confidentiality regarding all matters.
4. The Compliance Officer (CO) is responsible for the daily operation of the compliance program.

Procedure

1. The CO's general responsibilities include but are not limited to the following:
 - A) Ensuring proper functioning of the hotline and webpage
 - B) Establishing reporting and records maintenance procedures
 - C) Conducting appropriate investigations and follow-up
 - D) Providing feedback to those reporting compliance concerns when necessary
 - E) Reporting compliance activity to the oversight committee
 - F) Maintaining security for all compliance related documents
2. The compliance program will be staffed with qualified and properly trained personnel. Anyone wishing to report a compliance concern will be given the opportunity to speak directly with someone from compliance.
3. Anyone reporting a compliance concern will be covered by the Cayuga Health System's non-retaliation policy.
4. No attempt will be made to identify anyone reporting a compliance concern who requests anonymity.
5. The CO will communicate any matter deemed potentially unlawful to legal counsel.
6. ALL reports will be documented. All call records will be logged.
7. When a compliance concern cannot be resolved immediately, a follow-up review or investigative action will be taken.
8. Other departments, as appropriate, may be contacted for advice or further investigation. In the event that the CO is not, in good faith, satisfied that a matter brought before the aforesaid departments was appropriately addressed and resolved, the CO will be responsible for and is authorized to take the matter to other persons in positions of authority.
9. The CO will report periodically to the Compliance Committee and the appropriate Board Committee with oversight of Compliance matters.