

**Aurora Health Care**  
**Compliance Helpline**  
**Call Response Procedure**

Revision Date: 04/2004

**PURPOSE OF PROCEDURE:**

The purpose of this procedure is to outline the steps necessary for an efficient and effective process to: (1) answer/respond to incoming compliance helpline calls, (2) communicate thorough and accurate information to the caller, (3) track the investigation and follow-up from each call, and (4) maintain records regarding the resolution of each call reported to the helpline.

**ACCOUNTABILITY:**

The Chief Compliance Officer has accountability for responding to internal disclosures of potential violations. The day-to-day responsibility rests with the Director of Corporate Compliance. S/he or her/his designee has the responsibility to respond to all incoming compliance helpline calls and fulfill the requirements of this procedure.

**PROCESS:**

1. An employee (or an individual other than an employee) who wishes to confidentially report a compliance concern can call the voicemail compliance helpline number at 1-888-847-6331.
2. The following message is heard by any person accessing the compliance helpline:

*You have reached the Compliance Line for Aurora Health Care. The number you dialed is always directed to a voicemail service. The Compliance Line voicemails are reviewed daily by the Director of Corporate Compliance. Your call is very important to us. We are here to assist you in addressing questions and to facilitate your reporting matters that may involve improper actions or violations of Aurora's Code of Excellence. Please leave your confidential question or concern after the tone. It is important to leave sufficiently detailed information to enable us to follow-up on your inquiry, including dates, names, facilities, and/or departments involved, as well as the names of other employees who can provide additional information. While you are not required to leave your name or number, if you would like a personal, confidential return call, your name and phone number are needed. In the alternative, if you wish to have a live conversation, you are welcome to call the Director of Corporate Compliance at 414-389-2157.*

3. The caller leaves a message on the compliance helpline message center.
4. The information retrieved from the compliance helpline message center is transcribed/summarized to a compliance helpline call log form. (See attached.)
5. If the caller left his/her identity and a phone number, a member of the compliance department will contact the employee for follow-up to obtain any additional information not left on the voice message. Any additional information obtained will be added to the original helpline call log form.
6. If the concern or question relates to an issue other than compliance, the content of the message will be routed to the appropriate department for investigation, follow-up and resolution. This delegation will be noted on the helpline call log form. The compliance department will mark this issue "closed" upon delegation to the proper department.

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7. If the concern or question is a compliance issue, the compliance department will thoroughly investigate, follow-up and resolve the open item. All completed (or initiated but incomplete) actions will be noted on the helpline call log form. (If the caller identified her/himself, the compliance department will follow-up with the caller to disclose the outcome of the investigation to the extent allowed given privacy or confidentiality constraints.)
8. All materials associated with the call and subsequent investigation will be attached to the original helpline call log form (policy copies, memos, interview notes, etc.).
9. All compliance helpline calls will be brought to resolution and actions taken noted on the log form.
10. Each compliance helpline call log form will be maintained in a locked file in the office of the Director of Corporate Compliance. Only members of the compliance department have access to these records.

