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Owner	Ximena Restrepo: Compliance and Privacy Partner
Area	Compliance
Applicability	BCLH System

Hotline/Integrity Helpline, A332

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PURPOSE

To provide awareness and to present opportunities for the identification, investigation, correction, and prevention of inappropriate activities. All information reported to the hotline/integrity helpline will be treated confidentially, and Billings Clinic – Logan Health (BCLH) System and its Workforce Members will not retaliate or be retaliated for reports made in good faith.

POLICY

The Hotline/Integrity Helpline offers an alternative means of reporting ethical or compliance issues in situations when an individual may not feel comfortable reporting the concern directly to their manager or another member of leadership. The Helpline is an external, toll-free platform available 24/7, that allows confidential reporting of workplace concerns, including suspected illegal or unethical behavior; non-compliance with laws, regulations and policies; or knowledge of healthcare fraud, waste or abuse.

PROCEDURE

1. We encourage Workforce Members to communicate concerns using their normal chain of command. They may also contact the compliance departments and/or the anonymous reporting option as follows:
    - Contact the Chief Compliance Officer (CCO) directly:
        - Billings Clinic: compliance@billingsclinic.org – 1800-332-7156, ext. 5033
        - Logan Health: ComplianceOffice@logan.org - 1833-594-0321
    - BCLH anonymous reporting option through the third-party Integrity Helpline: by

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phone 1844-760-5833 or portal: www.mycompliancereport.com/LOGAN

- *Note: for Patient Complaints or Grievances - refer to your facility Patient Complaint and Grievance policy.*

2. Calls and reports made through the Hotline/Integrity Helpline are logged by the external vendor, and kept confidential and private, then forwarded to the Compliance Department.
3. Reporters are provided with a report ID number from the vendor, and instructions on how to follow up on their question or concern if needed.
    A. In some cases it is difficult for BCLH to investigate without the identity of the reporter. In these instances, the reporter will be asked if they consent to having their name disclosed. In all instances the wishes of the reporter will be respected.
    B. A member of the compliance department evaluates each reported question or concern to determine if it can be investigated without obtaining additional information. Some reports cannot be investigated without additional information, but in these cases the external Helpline platform portal allows us to anonymously communicate with the reporter on the vendors secure website. The reporter can then choose to respond without revealing their identity.

Follow up and Investigation

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1. The Chief Compliance Officer (or designee) will triage the allegation and involve appropriate parties for investigation. The investigation may be a collaborative effort involving Human Resources, Legal Department, Compliance, or other appropriate operation leader or other individuals.
2. Review, and or investigations of Helpline reports are normally initiated within two (2) business days.
3. If the investigation reveals that the Workforce Member purposely made up, exaggerated, or distorted a report, that Workforce Member will not be protected under this policy.
4. If a concern is substantiated, Compliance will work with the appropriate individual(s) to implement a correction plan and oversee ongoing monitoring. Additionally, disciplinary action, up to termination, may be taken as a result of the investigation if policy violations are substantiated.

DEFINITIONS

Workforce Members: include BCLH employees, volunteers, trainees, board members, physicians, non-physician providers and other clinical personnel, leaseholders, contractors, students, vendors, and other persons whose conduct, in the performance of work for and is under the direct control of BCLH, whether or not they are paid by BCLH.

REFERENCES

United States Sentencing Guidelines, Sec. 8B2.1 https://www.ussc.gov/guidelines

OIG Compliance Program Guidance https://oig.hhs.gov/compliance/compliance-guidance/

The Code of Conduct is publicly available at - www.billingsclinic.com and www.logan.org website footer,

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or by using the search engine.

BCLH Reporting, Cooperating with Government Investigations, and Self-Disclosure Policy

BCLH Non-Retaliation and Non-Retribution Policy

Approval Signatures

Step Description	Approver	Date
BC Policy Committee	Patti Reisinger: CHIEF COMPLIANCE OFFICER	10/2026
System Policy Committee	Kelly Stimpson: Associate General Counsel	10/2026
Owner	Ximena Restrepo: Compliance and Privacy Partner	10/2026

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Applicability

Billings Clinic, Logan Health (locations excluding LHMC), Logan Health Chester, Logan Health Conrad, Logan Health Cut Bank, Logan Health Medical Center, Logan Health Shelby, Logan Health Whitefish

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