



Standard Operating Policies – SOP # 10 Employee Help Line

Title:	Employee Help Line	Effective Date:	11/10/2003
Author:	Chief Compliance Officer	Last Review Date:	12/01/2021
Location:	All Locations	Last Revision Date:	12/01/2021
Functional Area:	ADMINISTRATION		

POLICY

Regardless of job title or function, it is every Liberty Workforce member's responsibility to report compliance issues and violations. Liberty's Corporate Compliance Officer (CCO) will maintain a 24-hour telephonic Employee Help Line that Workforce members may use to report problems and concerns either anonymously or in confidence. All Liberty staff must be aware of the Employee Help Line as a key mechanism for reporting and resolving suspected compliance violations and problems.

PROCEDURE

1. **Access to the Employee Help Line and anonymity**

Liberty provides a dedicated toll-free telephonic answering, reporting and tracking system for compliance concerns. The Employee Help Line is staffed with qualified and properly trained Compliance Risk Specialists (CRS) on 24 hours a day 7 days a week basis by a third-party hotline monitoring and reporting service. All incoming calls, regardless of the time of receipt, are answered by a live-voice CRS. The CRS will make no attempt to identify a caller who requests anonymity. When the caller discloses his/her identity, it will be held in confidence to the fullest extent practical or allowed by law.

2. **Severity Codes and notification timelines**

The CRS will document all reported concerns and prepare a detailed structured report for delivery to Liberty within 24 hours of receipt by the CRS. Calls will be assigned a severity code that indicates the urgency timeline for contacting the CCO:

SEVERITY I: There is an immediate threat to person(s), property, or environment. The CCO must be immediately contacted regardless of the hour of day or day of week.

SEVERITY II: There is a threat to person(s), property, or environment, but it is not immediate. The CCO must be verbally contacted during reasonable hours.

SEVERITY III: Assigned to all other calls.

Regardless of severity code, the CCO is provided with written documentation of each call. The CCO must communicate any matter deemed potentially unlawful to legal counsel within two business days after receiving initial information.

3. **Calls that require further inquiry or investigation**

When an Employee Help Line call cannot be resolved while the caller is on the line, a follow-up review or investigative action will be taken. The caller may be asked to call back at an agreed date and time in case additional information is needed. Callers will be provided a Risk Assessment Number (RAN) to protect their identity and to facilitate the provision of information about the status and/or resolution of the reported matter. A call back date is assigned to each identified concern, and further defined by the severity code that is given to the situation. The call back date is supplied to the caller so he/she may obtain subsequent information about the status or disposition of the problem. Additionally, new information can be gathered if available. This process keeps the communication door

open while maintaining the caller’s anonymity. Employee Help Line reports will be subject to a good-faith preliminary inquiry to determine whether a more thorough internal investigation is necessary. If a preliminary review of the matter suggests that there is a substantial violation of applicable law and/or the requirements governing private- or government-sponsored health plans, a full investigation will promptly be conducted to determine its veracity. Legal counsel will be consulted in connection with such investigations.

The Employee Help Line operation will involve other departments, as appropriate, for advice or further investigation. In the event that the CCO is not, in good faith, satisfied that a matter brought before the aforesaid departments was appropriately addressed and resolved, the CCO will be responsible for and is authorized to take the matter to other persons in positions of authority.

Approved By: _____

Revision History

Version	Date	Author	Summary of Changes
#1	11/10/2003	Judith Ann Shields	Initial ISF release – refactor and update of previous security policies into distinct documents
#2	08/20/2004	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#3	01/18/2005	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#4	12/22/2006	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#5	12/22/2007	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#6	12/22/2008	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#7	11/15/2009	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#8	8/20/2010	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#9	01/18/2011	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#10	12/22/2012	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#11	12/22/2013	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#12	12/22/2014	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#13	11/15/2015	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#14	08/20/2016	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement

#15	12/22/2017	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#16	12/22/2018	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#17	11/13/2019	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#18	11/03/2020	Judith Ann Shields	Annual review, Attorney reviewed © LHC, Author Title not name, Policy Title. Added inactivity lock requirement
#19	12/01/2021	John Beck	Annual review, minor changes and removed former #4 on quarterly updates. Added inactivity lock requirement