



University of Connecticut Health Center

POLICY NUMBER 2003-33

January 29, 2007

POLICY: REPORTING COMPLIANCE CONCERNS

PREAMBLE:

We, at the University of Connecticut Health Center, affirm our dedication to the highest standards of ethical conduct, professionalism and high quality in our health care, research, education and public service activities. These concepts are constant priorities that are upheld in the behavior of each individual associated with UCHC.

The UCHC welcomes and encourages the reporting of compliance concerns. Reporting assists us in our obligation to embrace the concepts noted above as well as to maintain compliance with all laws, regulations, standards, policies and procedures.

This policy applies to all Health Center employees, students, volunteers or those doing business with UCHC. We also accept compliance reporting from our patients and the public. See the UCHC "Compliance Expectations and Guidelines" document for information regarding compliance issues.

The investigation of compliance inquiries is the responsibility of the UCHC Corporate Compliance Office. In many cases, the Office delegates investigations to appropriate units such as Human Resources, the Office of Diversity & Equity, the Research Safety Office, etc. The Corporate Compliance Integrity Officer (CCIO) is responsible for:

- Ensuring all such investigations are carried out in a fair and unbiased manner.
- Ensuring that those making complaints and/or reporting compliance concerns (individuals also known as 'whistle-blowers') are treated fairly, their confidentiality is protected to the extent the law allows, and no retaliation takes place.

I. Reporting:

A. When to Report

The University of Connecticut Compliance Program requires all individuals to promptly report any known or suspected violations of laws, regulations, standards, policies and procedures that apply to the University of Connecticut Health Center.

B. Where to Report

1. If you are an employee, student or volunteer, you may contact:
 - Your immediate supervisor
 - Your immediate supervisor's supervisor (if the compliance issue relates to your immediate supervisor)
 - An appropriate manager within the operating structure of the UCHC.
 - Associate/Assistant Dean or Dean of the appropriate school.
 - The Compliance Officer (CO) of the appropriate UCHC Domain. There are five Domains in the Compliance structure at UCHC. The Domains are as follows: Administrative, Clinical, Research, Finance, and Education.
 - The Corporate Compliance Integrity Officer (CCIO) if the reporting structure above has been exhausted, is unknown to you, or when you desire anonymity.
 - "REPORTLINE" – this is a confidential telephone reporting system operated by a private firm under contract with the Health Center. Reports are then forwarded to the CCIO but the private firm maintains the anonymity of the person.
 - The Federal Government or the State of Connecticut. (Please note that employees are encouraged to first utilize the above- mentioned internal reporting mechanisms.)

If in doubt about whether to report a concern, answer the following questions:

- Do I suspect or know illegal or improper conduct has occurred?
 - Have I talked with my supervisor, department manager or is the supervisor or manager part of the issue?
 - Do the issues or concerns remain unresolved or ignored?
 - If you answer "YES" to these questions, contact the CO of the appropriate UCHC Domain or the CCIO directly.
2. Persons doing business with the UCHC, patients, family members or members of the general public may contact:
 - The CCIO directly
 - "REPORTLINE"
 - The Federal Government or the State of Connecticut.
 3. Administrative personnel receiving reports from employees, students or volunteers must report the information to the CO of the appropriate UCHC Domain.

C. Contacting the Corporate Compliance Integrity Officer Directly:

Any individual may contact the Corporate Compliance Integrity Officer (CCIO) directly. A person may or may not choose to identify him or herself. Contacting the CCIO may be done in the following ways:

1. By phone to Ext. 3501. Calls to Ext. 3501 will be treated confidentially but anonymity cannot be guaranteed if calls are made from within the UCHC telephone system. Voice mail messages are also accepted.

2. In person to the CCIO at the Munson Road Building, 2nd Floor, Office of Audit, Compliance & Ethics.
3. In writing to the CCIO either through in-house mail, the US Postal Service, email or fax.
 - In- house mail address is: Corporate Compliance Integrity Officer
16 Munson Rd., 2nd Floor
Mail Code 5329
 - US Postal Service address is: University of Connecticut Health Center
263 Farmington Avenue
Attn: Corporate Compliance Integrity Officer
Farmington, CT 06030-5329
 - Email may be addressed to mauriello@nso1.uhc.edu or compliance.officer@uhc.edu
 - Confidential Faxes may be sent to the Corporate Compliance Integrity Officer at fax # (860) 679-1608.

D. Using the Confidential "REPORTLINE":

“**REPORTLINE**” is a **toll free** telephone number **1- 888-685-2637** that is operated by a private (non-UCHC) company. Information received is reported to the UCHC Corporate Compliance Integrity Officer for appropriate action. 'REPORTLINE' is staffed 24 hours a day, 7 days a week by independent specialists trained to obtain complete and accurate information in a confidential manner.

II. Confidentiality

Individuals, who report in good faith possible compliance issues, will be accorded confidentiality and/or anonymity to the extent possible under the law. The reporting individual's identity may become known during the normal course of the investigation and this possibility will be discussed with the individual by the CCIO.

III. Individual Responsibility for Compliance

The act of making a compliance report will not exempt the reporter from the consequence of their own participation in unethical or illegal conduct and does not relieve the reporter of the obligation to file reports otherwise mandated, such as incident reports required by John Dempsey Hospital and the Research Safety Office.

Reports that are proven with clear and convincing evidence to be made in bad faith, for example with reckless disregard or willful ignorance of the facts, will result in disciplinary action up to and including termination of the individual making such bad faith report.

IV. Feedback to the Reporting Individual

The CCIO acknowledges the receipt of all reports received whenever this is possible. Phoned reports left on the CCIO's private voice mail are acknowledged if a name and number are left, email is returned, letters are acknowledged if a return name and address are known and calls to the 'REPORTLINE' are acknowledged with a faxed or emailed response to the 'REPORTLINE' company, noting the receipt of the report in the CCIO's office.

Details of the progress on or resolution of investigations are generally not shared with the reporting individual, unless required by law. General activities may be shared as appropriate to assure the reporting individual that action is being taken on the issue reported.

V. Non-Retaliation, Non-retribution for Reporting

UCHC recognizes that individuals may be reluctant to report actual or potential wrong doing due to possible retaliation, retribution or harassment. UCHC policy regarding these issues states that:

- No supervisor, manager or employee is permitted to engage in retaliation, retribution or harassment directed against any individual who reports a concern.
- The CCIO is responsible for investigating any reports of retaliation, retribution or harassment of reporters (whistle-blowers.)

Iris Mauriello

1/29/07

Corporate Compliance Integrity Officer

Date

Peter Deckers, M.D. (signed)

1/31/07

Executive Vice President for Health Affairs

Date

Revised Policy: (Replaces Policies dated December 8, 2003 and April 14, 2003)