



Institutional Handbook of Operating Procedures (IHOP)

Section:	4 – Institutional Compliance Related		First Release Date: 10/01/2002	
Policy Name:	4_1_11 Compliance and Ethics Hotline/Reporting			
Revision Author:	Chief Compliance Officer		Reviewed Date: 08/15/2012	<input type="checkbox"/> Without Changes <input type="checkbox"/> With Changes
Original Author:	Chief Compliance Officer			
Approving Body:	Dates of Approval:			
Executive Cabinet	09/11/2012			
Executive Institutional Compliance Committee	09/11/2012		Next Review Date:	
Executive	08/21/2012		09/11/2015	
Department Head/Policy Owner	08/15/2012			

Scope:	This policy applies to all UTHSCT staff, independent contractors, and Medical Staff.
Purpose:	To establish protocols for how the Compliance Office receives, documents, and handles Hotline calls and reports.

POLICY:

All employees are aware of the importance of reporting a known or suspected violation of UTHSCT's Standards of Conduct, policies and procedures, and federal and state laws and regulations. It is every employee's ethical and moral obligation to report suspected violations or questionable conduct that may impact UTHSCT's Institutional Compliance Program. UTHSCT has adopted the following process to allow employees to report possible instances of non-compliance:

UTHSCT has established a compliance hotline for employees to report all suspected violations or questionable conduct. The hotline includes the following features:

1. The hotline is a telephone and online reporting service provided by an outside contractor. All reports are forwarded to the Compliance Office and the Hotline Triage Team is to perform a preliminary review of the written report.
2. The hotline telephone number is 1-877-507-7316. Calls are answered 24 hours per day, 7 days per week. Online reports may be submitted at www.tnwinc.com/UTHCTyler. This information is included in the Standards of Conduct Guide.
3. Calls and online reports to the hotline are treated anonymously and confidentially.
4. The caller is not recorded, traced or identified, and the caller is not required to furnish his/her name.
5. Information provided to the hotline service is treated as privileged to the extent permitted by applicable law.

Intentionally making false accusations is a serious violation of UTHSCT policy and will lead to disciplinary actions against the person making the accusation, up to and including termination of employment or cancellation of contract;

Employees may not use the hotline to protect themselves from the outcome of their own violations or misconduct;

The discipline will not be increased for an employee who reported his or her own violation;

The Chief Compliance Officer will communicate all complaints to the Executive Institutional Compliance Committee;



Each situation will be individualized, and the Chief Compliance Officer and Legal Affairs will initiate any corrections and/or follow-up on an as-needed basis.

Suspected fraud involving state funds may also be reported to the State Auditor's Office telephone hotline at 1-800-TX-AUDIT, or by accessing the State Auditor's Office website for fraud reporting at <http://sao.fraud.state.tx.us>.

Enforcement

All supervisors are responsible for enforcing this policy. Individuals who violate this policy will be subject to the appropriate and applicable disciplinary process, up to and including termination.