

UNIVERSITY OF ROCHESTER MEDICAL CENTER	UNIVERSITY OF ROCHESTER MEDICAL CENTER POLICY	Compliance Committee
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	Integrity Hotline	PAGE: 1 of 1

PURPOSE:

The URMIC Integrity Hotline provides a mechanism for employees to report any activity that may violate laws, regulations, URMIC policies, or the URMIC Code of Conduct. The goal is to identify issues that may adversely affect employees, patients or the organization; then investigate, correct, and prevent inappropriate activities.

POLICY:

Every URMIC employee is expected to report any activity he or she reasonably believes is in violation of the law, regulations, URMIC policies, or the URMIC Code of Conduct. Reports of violations may be made without fear of retribution and will be handled in a manner that protects the privacy of the caller to the extent permissible by law. (See non-retaliation Policy)

PROCEDURE:

1. The Compliance Office will oversee the operation of the Integrity Hotline. Calls will be answered during normal business hours; callers may leave a voice mail message if no one answers or if the call is made after normal business hours.
2. An Integrity Hotline Intake Form will be completed for all calls received to include all pertinent information such as: date of the call, name of caller if given, the names of persons or departments involved, a detailed description of the suspected violation, whether there is documentation to support the allegation.
3. The Compliance Officer, or his designee, will review every report received and will keep a documentary record of all calls. For each report, a record of each decision made and each action initiated will be kept. All reports will be kept for a period of six (6) years.
4. If there is the appearance of significant non-compliance, fraud, the violation of law or regulation, or any allegation involving sexual, racial, age, disability or any protected class abuse, harassment or discrimination, the Compliance Officer will notify the Office of Counsel to the Medical Center. The Compliance Officer will notify URMIC Leadership and/or the URMIC Board, of any significant allegations received over the Hotline.
5. At the discretion of the Compliance Officer, some non-compliance related calls will be referred to other departments. For example: personnel issues will be forwarded to the Human Resources Department for their investigation and follow up; patient complaints will be forwarded to Patient Relations, operational issues will be forwarded to the Office of University Audit, etc.
6. At the conclusion of the investigation, the Compliance Officer will document on the Integrity Hotline Intake Form all findings, corrective action plan, disciplinary action taken, education provided, etc.
7. On a semi-annual basis, the Compliance Officer will provide a summary of Hotline activities to URMIC Leadership.