

The Brody School of Medicine Policy and Procedure Manual

Topic: Compliance Hotline	
Section No.	Section Name: Compliance
Approval Date: 8/2/2006	Approval: Cynda Johnson, MD.

I. Purpose

The primary purpose of the Compliance Hotline, accessible either via telephone (866-515-4587), via email at bsomcompliance@ecu.edu, or via the Brody School of Medicine Office of Compliance website (<http://www.compliance.ecu.edu>), is to provide a means for faculty, staff, agents and volunteers of the Brody School of Medicine ("BSOM") to report any activity or conduct which he/she suspects is not in compliance with the Brody School of Medicine Compliance Program, (the "Program"), the Code of Conduct, or federal and state laws and regulations applicable to health care providers. Information received through the Compliance Hotline will be used to investigate and verify the existence of non-compliant activity and allow BSOM the opportunity to correct noncompliant conduct or behavior that is identified.

II. Policy

It is the policy of BSOM that a Compliance Hotline shall be available to all faculty, staff, agents and volunteers to report conduct and/or activity which is believed to be in non-compliance with the Program, the Code of Conduct, or federal and state laws and regulations applicable to health care providers. While employees within the BSOM are encouraged to report potential violations to their respective supervisors or administrators, the Compliance Hotline provides an additional method of disclosure.

III. Scope

This policy applies to all faculty, staff, agents and volunteers within BSOM.

IV. Procedure

A. Communication of Existence of Compliance Hotline: All employees and agents working within BSOM shall be advised of the Compliance Hotline. The Director of Compliance shall provide a Notice of the Compliance Hotline to the Chairs of each academic department and the lead administrator for each administrative office in BSOM to be posted in noticeable locations for employees/agents within those areas.

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- B. Anonymity of Individuals Making a Hotline Inquiry :** Except as required by law, no one shall disclose the name of any individual making an inquiry to the Compliance Hotline without the express consent of such individual. Individuals who make inquiries to the Compliance Hotline who wish to remain anonymous (unnamed) shall be given a reference number which shall be used to track and identify that individual. Individuals who use the bsomcompliance@ecu.edu email address to report compliance concerns shall be identifiable to the recipient of such email. However, individuals who access the Hotline via the Office of Compliance website shall not be identifiable by the recipient of such website inquiry.
- C. Use of Compliance Hotline:** Employees and agents of BSOM shall be encouraged to report potential violations to their respective supervisors or administrators or applicable contact person; however, the Compliance Hotline may be used as an alternative means of communication. The Compliance Hotline should only be used to report conduct or activity which the individual believes or suspects is not in compliance with the Program, the Code of Conduct, or federal and state laws and regulations applicable to health care providers. There shall be no reprisals for inquiries or good faith reporting of actual or potential violations of such non-compliant conduct. However, any individual who provides intentional false reports shall be subject to disciplinary action, up to and including termination. HIPAA privacy violations should continue to be reported to the University Privacy Officer.
- D. Compliance Hotline Procedures:** The Office of Compliance receives inquiries to the Compliance Hotline. The following procedures are to be followed in responding to an inquiry to the Compliance Hotline:
- Hotline Information:** Persons handling Compliance Hotline inquiries shall use the Compliance Reporting Information Sheet (the "IS"), Attachment "A," to obtain information necessary to allow for investigation of the complaint. In the case of an email or website inquiry, the IS shall be completed based on the email content, and a copy of the email inquiry shall be attached. The completed IS shall be maintained in a secure location. The Office of Compliance will

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appropriately and prominently label each IS as “confidential” and timely provide a copy of each IS to the Office of the Internal Auditor. The Internal Auditor shall maintain each copy of each IS as confidential audit material in a manner consistent with applicable state statute and that Office’s standard operating procedures to protect the contents of each IS from disclosure. The Office of Compliance shall also timely provide a copy of each confidential IS to BSOM Office of Risk Management and/or BSOM Chief Legal Counsel, as deemed necessary by the Office of Compliance or as requested by either BSOM Office of Risk Management or BSOM Chief Legal Counsel.

2. Hotline Inquiries During Brody School of Medicine Business Hours

(8:00-5:00): In most cases, inquiries to the Compliance Hotline during BSOM business hours will be handed by the Director of Compliance or his/her designee (hereinafter “Director”). If no one is available to answer a Hotline call, the caller will have the option of leaving a message on voice mail.

3. Hotline Inquiries Outside Regular Business Hours (including weekends and holidays):

A caller to the Compliance Hotline outside regular business hours will have the option of either leaving a message on the voice messaging system, or calling back during regular business hours. The Assistant to the Director of Compliance shall check the voice messaging system and Hotline email daily for any inquiries to the Compliance Hotline and shall have the Director promptly follow-up with the individual if he or she has left a telephone number or other contact information.

E. Compliance Hotline Protocols: Compliance Hotline inquiries must be handled in an appropriate manner to assure the individual that the information he or she is providing is important and will be handled in a confidential manner. These guidelines should be followed by anyone handling a Compliance Hotline inquiry.

F. Investigation of Compliance Hotline Inquiries: The Office of Compliance shall review each Compliance Hotline inquiry and determine the appropriate means, if any,

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to investigate the matter. As necessary, the Director shall delegate investigation of the matter to another department within BSOM, the University, the Office of the Internal Auditor, or to University Health System's Office of Compliance depending on the nature of the subject matter of the potential violation. In addition, BSOM Chief Legal Counsel shall be consulted as necessary in connection with the investigation of a potential violation. BSOM Chief Legal Counsel shall timely notify the Office of the Internal Auditor prior to the commencement of any investigation of the facts which instigated the investigation so that the Office of the Internal Auditor may determine the extent to which – if at all – it should become involved.

G. Maintenance and Retention of Compliance Hotline Records: The Office of Compliance shall be responsible for maintaining and retaining any and all documentation and records relating to Compliance Hotline inquiries and subsequent investigations, if any, for at least ten (10) years from the date the file is closed. Compliance Hotline records may be destroyed after the retention period has elapsed.

V. AMENDMENTS OR TERMINATION

This policy may be amended or terminated at any time.

VI. REFERENCES/RELATED POLICIES

None.

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CONFIDENTIAL

COMPLIANCE REPORTING INFORMATION SHEET

Date: _____ Time (if applicable): _____

Individual's Name (Optional and Confidential): _____

If anonymous, 4-digit tracking number: _____

Individual's Department (Optional and Confidential): _____

Individual's Phone Number (Optional and Confidential): _____

Received by: _____

Method of Contact Personal contact Telephone
 E-mail Website: _____
 Other: _____

Information Obtained from Individual:

a. Name(s) and Department of Individuals Involved in Alleged Non-Compliance:

b. Description of Suspected Non-Compliance, including date(s) and location(s), as applicable:

c. Name(s) of any other persons who may have knowledge regarding this matter (to remain confidential for purposes of investigating the alleged misconduct):

Copy to: Office of the Internal Auditor Date:
BSOM Chief Legal Counsel Date:
BSOM Office of Risk Management Date: