

A photograph of a modern multi-story building with a glass facade, illuminated from within at dusk. The building's name, "UCONN HEALTH", is displayed in large white letters on a dark section of the upper right corner. The sky is a deep blue, and the interior lights create a warm glow through the windows.

**UCONN
HEALTH**

Compliance and Ethics 2018 Annual Training

**UCONN
HEALTH**

2018 Annual Compliance Training

Welcome!



Compliance education is required annually by federal, state, University of Connecticut and UConn Health mandates.



As you complete this training, click on the links to view additional information or to locate applicable University and UConn Health policies.

For Technical Support

Contact the Help Desk at
860.679.4400

For Saba Support

Contact Chris Desjardins at
860.679.7577

For General Questions

Contact the Office of
University Compliance at
860.486.2530

For Healthcare & Regulatory Questions

Contact the Office of Healthcare and
Regulatory Compliance at
860.679.7015



Learning Objectives & Roadmap

Today's Roadmap

This training will review the following:

- About Compliance & the Code of Conduct
- Equity in Education & Healthcare
- State Code of Ethics
- Preventing Fraud, Waste, & Abuse

Learning Objectives

This training is intended to help you:

- Identify compliance resources and contacts
- Locate policies and procedures
- Be familiar with the state code of ethics
- Be familiar with the university code of conduct
- Recognize fraud, waste and abuse
- Define your role in compliance



This training should take approximately **30 – 40 minutes** depending on your role in the organization.

The deadline for completing the 2018 Annual Compliance Training is **Monday, January 14, 2019**.



About Compliance & the Code of Conduct

The Office of University Compliance

What We Do

- Responsible for institution-wide operation of the compliance & ethics program
- Includes role of Ethics Liaison
- Promotes the University's Commitment to Compliance & Ethics
- Manages the anonymous REPORTLINE
- Ensures coordination & consistency among individual compliance units
- Manages Compliance Committees
- Responsible for annual compliance training
- Monitors key compliance areas
- Supports University-wide compliance initiatives

Learn more at: <https://compliance.uconn.edu/>

The Office of Healthcare and Regulatory Compliance

What We Do

- Investigates healthcare concerns
- Provides healthcare and regulatory new employee orientation and annual compliance training
- Guides healthcare operational practices and assists with decision making
- Works with healthcare program design and modifications
- Collaborates with management on compliance with changing laws, regulations and statutes
- Prepares and coordinates healthcare for regulatory surveys

Learn more at: <https://health.uconn.edu/healthcare-regulatory-compliance>

Purpose of the Code of Conduct

The Code of Conduct publicly outlines standards of workplace behavior expected of all members of the University/UConn Health community.

It affirms each employee's responsibility to contribute to the University's compliance with laws, regulations and policies.

Certain UConn Health policies, such as the *Rules of Conduct* support the Code's values and principles.

Your conduct should always reflect the University's core values which are knowledge, honesty, integrity, respect, and professionalism.

Read Policies

[Code of Conduct](#)

[Rules of Conduct](#)

Individual Behaviors

The Code of Conduct stresses the importance of individual behaviors and their impact on the institution's success.

If you are faced with a situation where you are uncertain how to proceed, you should consult the Code of Conduct as well as UConn Health policies and procedures.

Speaking with your supervisor, other appropriate colleagues, or the Office of University Compliance is appropriate and valued. Remember, it is best to ask questions first.

Violations of the standards in the Code of Conduct or any UConn Health policy may result in appropriate disciplinary measures up to and including dismissal.

Consult the Code of Conduct

Seek guidance from appropriate individuals or offices

Violations may result in appropriate disciplinary measures



Equity in Education & Healthcare

Equal Opportunity and the Prevention of
Discrimination, Harassment and
Interpersonal Violence

Policies and Applicable Laws

The University has multiple policies addressing conduct expectations, as well as discrimination, discriminatory harassment, and sexual violence. These include (but are not limited to):

- Code of Conduct
- Policy Against Discrimination, Harassment and Related Interpersonal Violence
- Policy Statement: People with Disabilities

State and Federal statutes addressing these issues include (but are not limited to):

- Title VII of the Civil Rights Act of 1964
- Americans with Disabilities Act
- Age Discrimination in Employment Act
- Title IX of the Education Amendments of 1972
- Connecticut Fair Employment Practices Act

Policy Against Discrimination, Harassment and Related Interpersonal Violence

Approved by the Board of Trustees, and updated on August 1, 2018, the University-wide Policy Against Discrimination, Harassment and Related Interpersonal Violence (“Policy Against Discrimination”) applies to all University campuses, including UConn Health.

This policy addresses discrimination and discriminatory harassment, as well as sexual and gender-based harassment, sexual assault, sexual exploitation, intimate partner violence, stalking, complicity, and retaliation.

The policy also prohibits certain *amorous relationships* where power disparities are present.

Read Policy

[University of Connecticut
Policy Against
Discrimination,
Harassment, and Related
Interpersonal Violence](#)

Title IX

Title IX of the Education Amendments of 1972 is a comprehensive federal law that prohibits discrimination on the basis of sex in any federally funded education program or activity. The law also provides individuals protection against such discriminatory practices.

UConn is committed to creating and maintaining a campus environment free from all forms of sexual harassment, sexual violence, intimate partner violence and stalking.

For more information and resources, visit www.titleix.uconn.edu

Title IX Reporting Obligations

Virtually **all** University employees must report a **student's disclosure** of sexual assault, intimate partner violence and stalking to the Office of Institutional Equity (OIE).

Sexual Assault consists of (1) Sexual Contact and/or (2) Sexual Intercourse that occurs without (3) Consent.

Stalking means engaging in a course of conduct directed at a specific individual that would cause a reasonable person to fear for their safety or the safety of others, or for the individual to suffer substantial emotional distress.

Intimate Partner Violence includes any act of violence or threatened act of violence that occurs between individuals who are involved or have been involved in a sexual, dating, spousal, domestic, or other intimate relationship.

Title IX Reporting Obligations

Safety is the highest priority.

If you witness a sexual assault and/or an incident of intimate partner violence or stalking, ***call 911 immediately.*** You should then contact OIE.

Office of Institutional Equity

16 Munson Road, 4th floor

Farmington

860.679.3563

equity@uconn.edu

<https://equity.uconn.edu/>

Additional Information

[UConn Health Reporting and Resources Brochure](#)

[What To Do When a Student Discloses...](#)

Title IX Reporting Obligations

Deans, Directors, Department Heads and Supervisors must also report **any** discrimination, harassment, sexual misconduct, inappropriate amorous relationships or other Prohibited Conduct to OIE.

Failure to report any known incidents as required by the University's *Policy Against Discrimination, Harassment and Related Interpersonal Violence* is a violation.

Retaliation against any individual who, in good faith, reports or who participates in the investigation of alleged violations is strictly prohibited.

Definitions Under the Policy Against Discrimination

- Discrimination is any unlawful distinction, preference, or detriment to an individual that is based upon an individual's protected class that: (1) excludes an individual from participation; (2) denies the individual the benefits of; (3) treats the individual differently; or (4) otherwise adversely affects a term or condition of an individual's employment, education, living environment or participation in a University program or activity.
- Discrimination includes failing to provide reasonable accommodation, consistent with state and federal law, to persons with disabilities.
- Discriminatory harassment consists of conduct based upon an individual's protected class that interferes with that individual's educational or employment opportunities or participation in a University program or activity.

Amorous Relationships

Relationships between Faculty/Staff and Undergraduate Students

- Faculty and staff are prohibited from pursuing or engaging in an amorous relationship with any undergraduate student.

Relationships between Faculty/Staff and Medical/Dental/Graduate Students

- Faculty and staff are prohibited from pursuing or engaging in an amorous relationship with a graduate student actually under that individual's authority.
- "Authority" includes teaching, formal mentoring or advising, supervision of research, employment, grading, or disciplinary action.

Relationships between Supervisors and Subordinates

- Faculty and staff are prohibited from pursuing or engaging in an amorous relationship with employees whom they currently supervise.

Non-Discrimination Under the Affordable Care Act

The Department of Health and Human Services' (DHHS) *Nondiscrimination in Health Programs and Activities* rule implements Section 1557 of the Affordable Care Act (ACA).

This is the first federal civil rights law to broadly prohibit discrimination in federally funded health programs.

The rule prohibits discrimination on the basis of race, color, national origin, sex, age or disability in certain health programs and activities.

Definition of Sex Discrimination

Under the *Nondiscrimination in Health Programs and Activities* rule, sex discrimination includes, but is not limited to, discrimination based upon:

- an individual's sex
- pregnancy, childbirth, related medical conditions, pregnancy termination
- gender identity
- sex stereotypes

The rule provides explicit protections for:

- lesbian, gay and bisexual (LGB) individuals on the basis of sex stereotypes
- transgender individuals and gender minorities on the basis of gender identity

Language Access to Healthcare Programs

- Entities must provide effective language assistance services to individuals with limited English proficiency (LEP), in a timely manner and free of charge.
- Qualified interpreters must be offered when oral interpretation is a reasonable step to provide meaningful access to health programs.
- Taglines (short statements in non-English languages) to notify individuals of the availability of language assistance services must be included in an entity's significant publications and posted in prominent locations.
- Consistent with principles of civil rights law, the rule prohibits segregation, delay or denial of services or benefits based on an individual's race, color or national origin.

Read Policy

[Interpreters/Linguistic
Access for Persons
with Limited English
Proficiency](#)

Non-Discrimination Statements for Publications

- Publications describing or inviting participation in UConn programs or activities must contain a non-discrimination statement.
- Departments producing applicable publications must incorporate the required non-discrimination statement into existing, revised and new material.
- Event-specific publications must include an accessibility statement to ensure the opportunity for participants with disabilities to request accommodations and fully participate in events or activities.

Refer to Policy

[Non Discrimination Policy Statements for Publications...](#)

Physical Access to Healthcare Programs

- Buildings in which health programs or activities are conducted are subject to the *Accessibility Standards for Buildings and Facilities* under the Affordable Care Act.
- The Standards include accessibility requirements for such areas as patient rooms, toilet rooms, parking lots, waiting rooms, among others.
- The Standards specify signage is to be posted at inaccessible entrances directing individuals to an accessible entrance location. Such signage must include the International Symbol of Accessibility.



Auxiliary Aids and Services

- Entities must ensure that communications with individuals with disabilities are as effective as communications with others.
- Auxiliary aids and services are a means to provide effective communication and **must** be provided upon request. Examples of auxiliary aids and services include:
 - Qualified sign language interpreters
 - Captioning
 - Large print materials
 - Screen reader software
 - Text telephones (TTYs)
 - Video remote interpreting services



Deaf or Hard of Hearing

- UConn Health must ensure effective communication with patients and their companions who are deaf or hard of hearing related to all aspects of the patient's care.
- Responsible staff members must:
 - assess each individual's specific needs to determine the type of aid or service that may be necessary, considering the expressed preference of the patient and/or companion.
 - document the determination in the medical record and patient registration system.
 - reassess and document the effectiveness of the auxiliary aid or service.
- Individuals who may have contact with patients or others that are deaf or hard of hearing should read the effective communication policy.

Read Policy

[Effective Communication with Individuals Who Are Deaf or Hard of Hearing](#)

Service and Emotional Support Animals on Campus

- Under the Americans with Disabilities Act (ADA) and UConn policy, service animals are generally allowed on the UConn Health campus in areas where the animal's handler is permitted to be.
- In limited situations, an animal may be prohibited for safety and health reasons.
- Members of the University community may not interfere with a service animal or its duties.
- Emotional Support Animals (ESAs) are allowed to accompany patients in non-restricted areas with advance approval.
- Employees must contact Human Resources in advance of reporting for work with an animal.
- Review the [Animals on Campus Policy](#) and [UCH Clinical Practice Procedures Regarding Animals](#) for more information.





ethics

State Code of Ethics

Who's Responsibility is it?

Compliance with the State Code of Ethics is each employee's *individual* responsibility.

Violations of the State Code of Ethics carry a *personal liability* and can result in fines of up to \$10,000 *per violation*.

- As employees, our primary obligation is to act in the best interest of UConn Health and the State of Connecticut.
- You may not use your position or authority for your own or your family members' financial gain.

Overview of Code

What are the rules regarding accepting gifts?

In some situations it is perfectly fine to accept items from vendors. But, it's important to know the limits allowed under the State Code of Ethics.

For more information click below:

[Personal Gifts](#)

[Supervisor/subordinate gifts](#)

[Food and Beverage](#)

[Gifts to the State](#)

Refer to Policy

[Gifts to UConn Health
Employees](#)

Personal Gifts

A “gift” is defined as anything that you or, in some circumstances, your family member directly and personally receives unless you pay for the item.

There are limits on the value of gifts that may be accepted:

- from companies doing or seeking to do business with UConn Health (under \$10 is generally OK).
- from patients or students (under \$100 is generally OK).

[Return](#)

Gifts Between Supervisors and Subordinates

Gifts to or from supervisors or subordinates anywhere within one's chain of command must be valued at no more than \$99.99 **per gift**.

Pooling money for group gifts that would exceed the \$99.99 limit is **not permitted**.

Exceptions to this limit are those gifts given for a major life event including:

- Birth or adoption of a child
- Wedding or civil union
- Funeral
- Ceremony for induction into religious adulthood (such as bar mitzvah or confirmation)
- Retirement from public service or state employment

There are no limits on the value of gifts between co-workers outside of each other's chain of command.

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Food and Beverage

Employees may accept food and beverage from vendors at educational presentations or other meetings.

There are limits on the total value of food and beverage that each employee may accept (generally up to \$50 per vendor per calendar year).

Remember, in order to accept the food and beverages, the vendor representatives must be present when they are consumed. Employees may not accept items such as restaurant gift certificates in any amount if the vendor will not be present when the food is consumed.

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Gifts to the State

Gifts to the State are goods or services given to a state agency like UConn Health that facilitate state functions and:

- will be used on state property (e.g. a computer or other equipment)
or
- support a state/UConn Health event (e.g. an educational seminar)
or
- support an employee's participation in an event that is *relevant to his or her UConn Health/state duties*. Supervisor approval is required.

Payment for participation in an event may *not* include costs for family members, guests or entertainment.

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Gifts to the State - Office of State Ethics Reporting Requirement

Effective October 1, 2018

PLEASE NOTE

What's New?

The Legislature recently passed an act that requires state employees to file an online report with the Office of State Ethics within **30 days** after receiving certain goods or services under the Code of Ethics' "gift to the state" exception.

This requirement is **in addition** to the existing reporting of "**necessary expenses**" obligation.

When does this apply?

The reporting requirement applies to goods or services that support such individual's participation at an event (e.g., a conference) that facilitates a state agency (UConn) action or function (i.e., the event is relevant to his or her state job) and

1. include lodging or out-of-state travel and
2. are provided by donors other than the federal or another state government.

How could this impact you?

Employees who fail to report within the 30-day period intentionally or due to gross negligence must return to the donor the value of the goods or services received and may be subject to additional penalties.

For more information on how to file an online report to the Office of State Ethics visit:

<https://www.ct.gov/ethics>

Outside/Post-State Employment

Am I allowed to work in a job or have a business outside of my job at UConn Health or after I leave UConn Health?

Outside jobs or businesses are permitted within certain parameters of the State Code of Ethics.

Individuals considering outside employment or business should review the Code of Ethics and other applicable rules.

For more information click below:

- [Outside or post-state employment](#)
- [Employee contracts with the state](#)
- [Hiring a supervisor/subordinate for a private business](#)

Outside or Post-State Employment

“Employment” is defined as any work or endeavor undertaken to obtain financial gain such as an employee of a business, sole practitioner, independent contractor, or investor.

Work conducted outside of UConn Health must not interfere with your independent judgment regarding your state duties or encourage disclosure of any type of UConn Health confidential information (e.g. patient, employee, student, or financial).

State time, resources or personnel may not be used for any type of personal endeavor.

Certain limitations also apply after leaving state service.

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Employee Contracts With a State Agency

Any employee that wishes to enter into a contract with UConn Health or any state agency (either personally or on behalf of your own or a family member's business) that is valued at \$100 or more may do so ***only through an open and public bidding process.***

Refer to [Procurement Operations and Contracts](#) for more information.

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Hiring a Supervisor or Subordinate for Private Business

State employees may not employ their supervisors or subordinates who are *anywhere in their chain of command* to work in an outside business or to perform other personal work.

Both situations could improperly influence a supervisor's or subordinate's independent judgment needed to carry out his or her state responsibilities.

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Other Forms of Financial Gain

The State Code of Ethics does not permit employees to use their official positions in any way for personal financial benefit.

For more information click below:

[Use of position or confidential information](#)

[Use of state resources](#)

Use of Position or Confidential Information

State employees may not use their

- positions or
- confidential information gained in state service

for their own financial benefit or the financial benefit of family members or a business with which they or their family member(s) are associated.

[Return](#)

Use of State Resources

State employees may not use state time, personnel, materials or any other resources for personal, non-state related purposes.

This includes telephones, computers, email systems, fax and copy machines, state vehicles or any other supplies.

Incidental use of state property is permissible as long as an employee reimburses the state for any identifiable charges. However, these situations should be infrequent and not routine.

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Limitations

Are there any limitations on accepting appearance fees for an activity or payment of associated expenses?

The State Code of Ethics includes specific provisions that address payment for services and associated expenses.

For more information click below:

[Appearance fees](#)

[Necessary expenses](#)

Appearance Fees

An employee may not *personally* accept fees or honoraria for activities such as giving a presentation or running a workshop that is carried out in his or her UConn Health capacity.

In these instances, the money may be directed to a University account for future University-related business.

Consider whether the employee's UConn Health position was a significant factor in extending the invitation to participate. If so, this rule applies.

If an employee has been invited to participate based upon his or her knowledge or expertise, the employee can likely personally accept an honorarium.

It is always best to seek guidance about specific situations.

[Return](#)

Necessary Expenses

If a personal fee or honorarium is not permitted for an activity carried out in the employee's state capacity, *payment or reimbursement* of expenses associated with the activity may still be accepted. Such expenses include out-of-state travel, standard lodging for the days immediately surrounding the activity, meals (non-lavish), and conference related fees.

Costs for family members/guests or entertainment are not considered necessary expenses.

Payment or reimbursement for lodging and/or out of state travel must be reported to the Office of State Ethics within 30 days of receipt.

Refer to the [ETH-NE form](#) and [guide](#) for specific information.

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Conflict of Interest Disclosure

As an employee, you may be faced with a conflict of interest if you are required to take action in your UConn Health role that could result in a direct monetary gain or loss for yourself, certain family members or a business with which you are associated.

In situations where potential or actual conflicts of interest exist, you may not take *any action* on that matter. A written statement describing the conflict must be submitted to your supervisor who will assign the matter to another employee.

Refer to

[Disclosure of Conflict of Interest Form](#)

Where Can I Go For Help?

Help with specific questions, situations or concerns is available through the University Compliance Office or the Office of State Ethics.

Contacts:

Kimberly Fearney, Interim AVP &
Chief Compliance Officer Ethics Liaison
860.679.1802

fearney@uchc.edu

<https://compliance.uconn.edu/ethics-overview/>

Office of State Ethics

860.263.2400

ethics.code@ct.gov

Refer to

[University Guide to
the State Code of
Ethics](#)

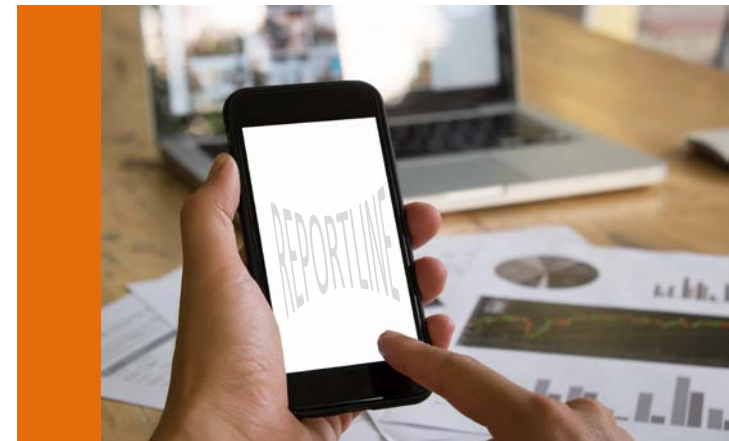
Where Can I Go For Help?

Concerns or suspected violations of the State Code of Ethics, may also be reported anonymously to:

REPORTLINE

888.685.2637

<https://uconncares.alertline.com/gcs/welcome>



Code of Ethics for Contractors

Current or potential state contractors are considered “restricted donors” under the State Code of Ethics.

Contractors must comply with restrictions regarding certain facets of the contract relationship such as gifts, fees or other payments, and outside employment during the bidding process as well as after a contract is awarded.

Refer to:

[Public Officials and State Employees Guide to the Code of Ethics](#)

Conflicts of Interest

Employees negotiating or managing contracts must be very cautious to avoid or appropriately manage actual or potential conflicts of interest.

Employees may not provide any solicited or unsolicited information to a contractor that is not available to other bidders and could result in a competitive advantage.

Giving anything of value to an individual hired by the state as a consultant or an independent contractor in order to influence that individual is also prohibited.

Conflicts of Interest Disclosure

In the event of an actual or potential conflict of interest related to your involvement in contract negotiations or management, a written statement describing the conflict must be submitted to your supervisor.

In those instances, you may not take **any action** on that matter. It must, instead, be assigned to another employee.

Refer to:

[Disclosure of Conflict of Interest Form](#)

[Procurement Operations and Contracts](#)

Preventing Fraud, Waste & Abuse



Fraud, Waste and Abuse

Fraud, waste and abuse cost institutions as well as state and federal governments millions of dollars each year.

As UConn Health employees, we have a collective responsibility to minimize waste, avoid abuse of valuable UConn Health and state resources and, particularly, to prevent actions that would constitute fraud.



What is Fraud?

Fraud is an intentional misrepresentation of information for unauthorized financial gain or to derive some other benefit.

Examples of fraud include:

- Falsifying a time report or credentials;
- Offering, soliciting or receiving a bribe or kickback;
- Diverting cash, equipment or supplies;
- Altering an accounting record or supporting documents;
- Deliberate misstatements or omissions on financial statements;
- Identity theft.

What is Waste?

Waste is defined as a misuse of resources or practices that result in needless expenditures of UConn Health, state and/or federal funds. It often stems from individuals being uninformed, careless, or from poor decisions.

Examples of waste include:

- Purchasing unneeded equipment or supplies.
- Purchasing goods at inflated prices.
- Replacing equipment unnecessarily or failing to recycle equipment appropriately.

What is Abuse?

Abuse is defined as the improper use of funds, resources or authority that results in higher costs to UConn Health or to the state and federal governments.

Examples of abuse include:

- Misusing paid time or manipulating expense reimbursements.
- Using your state position or authority for personal financial gain.
- Accepting gifts or favors for awarding contracts to vendors.

Preventing Waste and Abuse

Waste can be prevented by avoiding purchases or other practices that unnecessarily consume time, money or resources. Purchasing and contract decisions should be made only by individuals with adequate information and appropriate authority.

Abuse can be prevented by using UConn Health/state time, personnel and resources appropriately and only for **business** purposes.

If it's not related to your UConn Health job responsibilities, it is not an appropriate use of state resources.

Protecting UConn Health Assets

All UConn Health employees must safeguard the State's property and assets with which they are entrusted.

Asset control is a partnership between employees, managers and the Office of Logistics Management (OLM).

Lack of accountability results in damaging publicity, negative audit findings, reputational harm, and potential loss of funding.



Asset Control: Manager Accountability

Department Heads are accountable for all assets listed as belonging to their respective departments.

- Managers must ensure that appropriate *Inventory Control Forms* are submitted to OLM when assets are moved, transferred, disposed of, lost, or damaged and collaborate with OLM to reconcile asset lists as soon as they are received.

Staff should assist OLM to locate their departments' assets during each physical Inventory. A list of all assets that are not located will be returned to the department for investigation.

- Remember to submit the applicable Inventory Control Form to OLM before disposing of any asset.
- Even if you no longer have the asset, it will remain assigned to your department on the official asset list. You will continue to be responsible for the asset until OLM receives the completed form.

Asset Control: OLM Role

OLM is responsible for:

- Tagging capital and controllable assets when they are received by UConn Health.
 - *Note: In situations where items do not pass through the receiving dock, departments must notify OLM.*
- Scanning asset tags on equipment located in each department during the physical inventory.
- Maintaining and updating UConn Health's official asset list based on physical inventory results and Inventory Control forms submitted by departments throughout the year.

Refer to:

[Asset Control](#)

[Asset Control
Procedures](#)

Using electronic equipment appropriately

Employees are provided electronic resources to enable faculty, students and staff to accomplish work that is part of UConn Health's mission.

Electronic, computing and networking equipment and software including UConn Health email must be used for *UConn Health business purposes* only.

Read Policy:

[Information Technology
Computer/Electronic
Resource Use Policy](#)

Refer to:

[Acceptable Use of State
Systems](#)

Travel and Entertainment

Travel to conferences and other events related to one's official UConn Health responsibilities or hosting guests/candidates is an important part of furthering the reputation of UConn Health and enhancing the productivity of its workforce.

However, similar to the management of other UConn Health and state assets, it is important that workforce members practice fiscal, ethical and public responsibility by respecting and safeguarding travel privileges and related funds.

Refer to:

[Travel and Entertainment](#)

The Who, What, When and Why of Fraud

Who commits fraud?

Anyone is capable as long as there is a means, a motive and an opportunity.

What circumstances contribute to fraud?

Situations motivated by internal and external pressures such as financial stress, performance expectations, or even well-meaning institutional goals.

When does fraud occur?

Whenever an opportunity exists where there are weakened internal controls, breakdowns in processes, confusing practices or lack of definitive process “owners.”

Why does fraud happen?

Improper actions that occur as a one-time event may escalate and, over time, become justified in the eyes of the individual or entity.

Fraud Prevention Begins with You

To minimize the opportunity for fraud at UConn Health, employees and managers must follow established policies and appropriate departmental procedures:

- Avoid short cuts or other practices that compromise processes.
- Assume responsibility only for activities for which you are authorized.
- Ask questions or seek guidance if you are unclear or uncomfortable with a task or responsibility.

Managers have a responsibility to prevent fraud by delegating responsibilities appropriately, answering questions, providing appropriate guidance and oversight of department processes, ensuring proper checks and balances with established processes and correcting procedural weaknesses.

Recognizing Fraud

Prevention of fraud begins with recognizing signs of possible deception such as:

- missing or altered documentation of transactions or financial statements.
- unreconciled inventory discrepancies or shortages.
- unusual or improper bidding or contract negotiation processes.
- situations in which required business processes are bypassed.

Reporting Fraud

If you notice questionable activity or signs of potential fraud, report your concerns immediately to:

- Your supervisor
- Office of Healthcare and Regulatory Compliance
860.679.7015 • compliance.officer@uchc.edu

Anonymously to: **REPORTLINE** at **888.685.2637** or via
<https://uconncares.alertline.com/gcs/welcome>

Employees also have the option to report concerns of potential fraud to:

- State Auditors of Public Accounts
860.240.5300 or 800.797.1702 • ctauditors@cga.ct.gov

UConn Health strictly prohibits retaliation against individuals who, in good faith, report a compliance issue

Refer to:

[Non-Retaliation
Prevention and
Reporting of Fraud
and Fiscal
Irregularities](#)

Important Reminder

In this section, we would like to draw your attention to the Workplace Violence Prevention Policy.

Employees, students, volunteers, vendors, visitors and others who work in locations under the UConn Health umbrella have an obligation to uphold this policy to prevent workplace violence.

Incidents of violence that create a risk to anyone must be reported to UConn Health Police ***immediately***.

[Workplace Violence Incident Report Form](#)

Read Policy

[Workplace Violence
Prevention Policy](#)

Questions?

For additional information related to this training or general compliance and ethics questions contact:

The Office of University Compliance

860.486.2530 • fearney@uchc.edu • <https://compliance.uconn.edu/>

You may also wish to contact the following offices for questions related to specific topics presented in this training:

Preventing Fraud, Waste, &
Abuse Medicare Parts C & D

Office of Healthcare & Regulatory Compliance

860.679.7015 • abromaitis@uchc.edu

<https://health.uconn.edu/healthcare-regulatory-compliance/>

Equity in Education &
Healthcare

Office of Institutional Equity

860.679.3563 • equity@uconn.edu • <https://equity.uconn.edu/>