PREAMBLE:

We, at UConn Health, 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 UConn Health.

UConn Health 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 UConn Health employees, students, volunteers or those doing business with UConn Health. We also accept compliance reporting from our patients and the public. See UConn Health Policy 2003-35 Compliance Expectations and Goals for information regarding compliance issues.

The investigation of compliance inquiries is the responsibility of the UConn Health Compliance Office. In many cases, the Compliance Office delegates investigations to appropriate units such as Human Resources, the Office of Diversity & Equity, the Research Safety Office, etc. The Compliance Integrity and Privacy Officer (CIPO) 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 UConn Health Compliance Program requires all individuals to promptly report any known or suspected violations of laws, regulations, standards, policies and procedures that apply to UConn Health.
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 UConn Health.
   - Associate/Assistant Dean or Dean of the appropriate school.
   - The Compliance Integrity & Privacy Officer (CIPO) 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 UConn Health. Reports are then forwarded to the CIPO 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 CIPO directly.

2. Persons doing business with UConn Health, patients, family members or members of the general public may contact:
   - The CIPO 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 CIPO.

C. Contacting the Compliance Integrity & Privacy Officer Directly:

Any individual may contact the Compliance Integrity & Privacy Officer (CIPO) directly. A person may or may not choose to identify him or herself. Contacting the CIPO 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 UConn Health telephone system. Voice mail messages are also accepted.

2. In person to the CIPO at the Munson Road Building, 2nd Floor, Office of Audit, Compliance & Ethics.
3. In writing to the CIPO either through in-house mail, the US Postal Service, email or fax.
   - In-house and US Postal Service mail address is:
     
     Compliance Integrity & Privacy Officer  
     UConn Health  
     263 Farmington Avenue  
     Farmington, CT 06030-5329  
     
   - Email may be addressed to mauriello@UCHC.edu or compliance.officer@uchc.edu  
   - Confidential faxes may be sent to the Compliance Integrity & Privacy Officer at (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-UConn Health) company. Information received is reported to the UConn Health Compliance Integrity & Privacy 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 CIPO.

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 CIPO acknowledges the receipt of all reports received whenever this is possible. Phoned reports left on the CIPO'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 online noting the receipt of the report in the CIPO'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

UConn Health recognizes that individuals may be reluctant to report actual or potential wrongdoing due to possible retaliation, retribution or harassment. UConn Health prohibits any supervisor, manager or employee from engaging in retaliation, retribution or harassment directed against any individual who reports a concern. Reports of retaliation, retribution or harassment of reporters (whistle-blowers), will be evaluated by the appropriate UConn Health department, (examples may include Labor Relations, the Office of Diversity and Equity, Chief of the Medical Staff, etc.).

Non-Retaliation Policy

Iris Mauriello (Signed) 4/29/15

Iris Mauriello
Compliance Integrity & Privacy Officer

Andrew Agwunobi (Signed) 5/5/15

Andrew Agwunobi, M.D., M.B.A.
Interim Executive Vice President for Health Affairs

New Policy: 4/14/03
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