



Administrative Policy
2023-11 Healthcare Compliance & Privacy Program –
Communication and Reporting Mechanisms

Title	Healthcare Compliance & Privacy Program – Communication and Reporting Mechanisms
Policy Owner and Contact Information	Office of Healthcare Compliance & Privacy Phone: 860-679-6060 Email: ohcp@uchc.edu Home Office of Healthcare Compliance & Privacy (uconn.edu)
Campus Applicability	All UConn Health campuses, including John Dempsey Hospital
Applies to	UConn Health Workforce Members
Effective Date	September 21, 2023

PURPOSE:

This document describes requirements for the maintenance and use of communication and reporting mechanisms for the exchange of healthcare compliance-related information and concerns, including for efficient, effective, and anonymous submissions of questions, concerns, and known or suspected violations.

POLICY STATEMENT:

1. Duty to Report

1.1 Workforce Members shall report the following to their chain of command, a member of the Office of Healthcare Compliance & Privacy, the Chief Healthcare Compliance & Privacy Officer, or the UConn REPORTLINE maintained by the Office of University Compliance:

- (a) Healthcare compliance- and privacy-related questions or concerns;
- (b) Known or suspected violations of the Healthcare Compliance & Privacy Program, including related policies and standards; and
- (c) Known or suspected violations of Federal or State laws and regulations.

1.2 Individuals in a Workforce Member’s chain of command who receive such reports shall communicate those reports to the Office of Healthcare Compliance & Privacy.

1.3 Failure to report known or suspected violations may result in sanction recommendations from the Office of Healthcare Compliance & Privacy.

2. Access to Chief Healthcare Compliance & Privacy Officer

UConn Health establishes that all Workforce Members have free and unrestrained access to the Chief Healthcare Compliance & Privacy Officer for the purposes of reporting healthcare compliance- and privacy-related concerns.

3. Compliance Hotline

The University of Connecticut Office of University Compliance maintains a toll-free REPORTLINE which allows for anonymous reporting regarding any campus or service of the University of Connecticut, including those related to UConn Health. The REPORTLINE shall remain available 24 hours per day, seven days per week, 365 days per year, and the toll-free REPORTLINE phone number and web address shall be posted conspicuously and provided in writing to each Workforce Member.

REPORTLINE Phone: 1-888-685-2637

REPORTLINE Web:

<https://secure.ethicspoint.com/domain/media/en/gui/78121/index.html>

4. Anonymity

Individuals who report potential compliance issues in Good Faith will be afforded privacy and/or anonymity to the extent possible under the law, unless doing so prevents UConn Health from fully and effectively investigating or responding to the reported concerns.

5. Record Keeping

The Office of Healthcare Compliance & Privacy shall maintain a log of all reports it receives, either in hard or electronic copy. The log shall, at a minimum, list the date received, method of reporting, nature of the complaint/report, investigation conclusion, and date of investigation closure.

6. Self-Reporting

UConn Health shall encourage self-reporting of known or suspected violations. Workforce Members who self-report wrongdoing shall be afforded due consideration in potential mitigation of any disciplinary action recommendations by the Office of Healthcare Compliance & Privacy.

7. Non-Retaliation

Under the University Non-Retaliation Policy, retaliation against any individual who, in Good Faith, reports and/or participates in the investigation of alleged violations, or who assists others in making such a report, is strictly forbidden.

Conversely, any individual who knowingly files a report or provides information as part of an investigation that is false or is filed in Bad Faith, is not protected under the same policy.

8. Oversight

The Chief Healthcare Compliance & Privacy Officer shall make regular reports to The University of Connecticut Board of Trustees' and the University of Connecticut Health Center Board of Directors' Joint Audit and Compliance Committee regarding overall volumes of reports and investigations as well as identified patterns or trends.

DEFINITIONS:

Bad Faith: Acting with knowingly false and/or made with malicious intent.

Good Faith: Acting with an honest and reasonable belief that a university-related violation of law or policy may have occurred.

Workforce Member: Employees, volunteers, trainees, and other persons whose conduct, in the performance of work for UConn Health, is under the direct control of UConn Health, whether or not they are paid by UConn Health.

REFERENCES:

OIG Supplemental Compliance Program Guidance for Hospitals, Vol 70, 4858 FR, No. 19 (Jan. 31, 2005).

Publication of the OIG Compliance Program Guidance for Hospitals, Vol. 63, 8987 FR, No. 35 (Feb. 23, 1998).

PROCEDURES/FORMS:

None

RELATED POLICIES:

[Non-Retaliation Policy | University Policies \(uconn.edu\)](#)

ENFORCEMENT:

Violations of this policy or associated procedures may result in appropriate disciplinary measures in accordance with University By-Laws, General Rules of Conduct for All University Employees, applicable collective bargaining agreements, the University of Connecticut Student Code, other applicable University Policies, or as outlined in any procedures document related to this policy.

APPROVAL:

Bruce Liang (Signed)
Bruce Liang, MD, FACC
Interim Chief Executive Officer, UConn Health
Executive Vice President for Health Affairs

9/21/2023
Date

Elle Box (Signed)
Elle Box
Chief Healthcare Compliance & Privacy Officer
Administrative Policy Committee Co-Chair

9/18/2023
Date

Janel Simpson (Signed)
Janel Simpson
Chief Administrative Officer
Administrative Policy Committee Co-Chair

9/19/2023
Date

POLICY HISTORY:

New Policy Approved: 9/2023

Revisions:

Reviewed Without Changes: