


Name of Policy: Anonymous reporting line Policy Number: 3364-15-05 Approving Officer: President Responsible Agent: Compliance/Privacy Officer Scope: All University of Toledo Campuses		 Effective date: August 1, 2008	
	New policy proposal		Minor/technical revision of existing policy
X	Major revision of existing policy		Reaffirmation of existing policy

(A) Policy statement

According to federal sentencing guidelines, The University of Toledo must provide procedures for employees to report in good faith suspected violations of university policy, federal, state or local laws and regulation.

(B) Purpose of policy

The purpose of the university anonymous reporting line (ethicspoint – 1-888-416-1308) is to provide an additional communication channel for employees to report any activity or conduct that they suspect violates university policies and procedures, and/or federal, state or local laws and regulations. Concerns received through the anonymous reporting line will be investigated and appropriate follow up actions taken.

(C) Procedures

Employees who have compliance related questions or concerns are encouraged to share them as soon as possible so that appropriate action can be taken. Multiple communication channels are available for employees to ask questions and report concerns. While employees are encouraged to obtain guidance or share concerns with their supervisors first, they may use any of the following communication channels:

- (1) Discuss the issue with supervisory personnel.
- (2) Contact the department that has subject matter expertise in the area of concern.
- (3) Contact the human resource department for human resource issues, etc.
- (4) Contact the compliance/privacy office at 419-383-6933.
- (5) Call the anonymous reporting line – ethicspoint at 1-888-416-1308 or web link www.ethicspoint.com .

(D) Anonymous reporting line calls

- (1) The anonymous reporting line is operated an outside service provider (ethicspoint) that collect and document information provided on the call. It operates seven days a week, twenty four hours a day, and three hundred sixty five days a year. The ethicspoint phone number is 1-888-416-1308 and website is www.ethicspoint.com.
- (2) The caller may remain anonymous and no attempts will be made to identify the caller, phone number or location. The University of Toledo complies with the whistle blower and “Qui Tam” provisions as required by the Federal False Claims Act, 31 USC § 3279. Employees who call the anonymous reporting line may remain anonymous. If the person requests anonymity, no attempt will be made to identify the employee. Information provided by the employee will be treated as confidential and privileged to the extent permitted by law.

The anonymous reporting line is not a complaint hotline. Employees should not report 911 emergencies on the anonymous reporting line.

- (3) The hotline operator will: greet and thank the caller, answer any questions the caller may have: reinforce that the caller does not need to identify him/herself. The operator will ask questions based on the nature of call to elicit the most complete information about each issue as possible. The caller will put in a password so that they may continue to access the report and any response from the investigation. A record retention log will be maintained of all calls/web-based complaints by ethicspoint.
- (4) After the anonymous reporting line call is received by the director of internal audit, the information will be distributed to the appropriate department to determine the appropriate disposition of the issue. All employees are expected to be truthful and cooperative in the university’s investigation of allegations.
- (5) All reported issues will be investigated as quickly as possible. Employees who call the hotline are instructed to return to the ethicspoint website within ten business days of filing a report using the report key assigned by ethicspoint and the employee’s private password. The university may have information or may require further information from the employee in order to proceed with an investigation. Confidential information obtained during the investigation will not be disclosed to the employee.

(E) How to use the anonymous reporting line

- (1) Call ethicspoint at 1-888-416-1308 or access the website www.ethicspoint.com.
- (2) Describe the issue in detail.
- (3) Record your password for future reference.
- (4) Call back within ten days to receive an update or report on actions taken to date.

(F) Confidentiality/good faith reports

The University of Toledo shall attempt to maintain confidentiality of an individual who reports concerns or misconduct upon request. However, confidentiality cannot be guaranteed, and disclosure of an individual's identity may be necessary in order to fully investigate the complaint. There is no retribution or discipline for anyone who reports a concern in good faith. Individuals shall not intentionally use the hotline to make false allegations.

(G) Compliance with standards

All university staff and faculty are expected to understand and follow regulations and policies applicable to their responsibilities. Staff and faculty are encouraged to report compliance concerns to maintain the integrity of the university's education, research, patient and mission.

(H) Reporting options for students

Most student concerns should be raised directly with the responsible university office. Student employees who have concerns regarding their university job can use the reporting options listed above.

Examples of university activities and operations in which non-compliance may be an issue

- (1) Various university, state or federal policies and procedures
- (2) Grant or gift restrictions
- (3) Safety policies and procedures
- (4) National Collegiate Athletic Association guidelines
- (5) Conflict of interest or ethics policies
- (6) Internal Revenue Service regulations
- (7) Computer security
- (8) Human resource policies and procedures
- (9) Accounting and financial policies and procedures
- (10) Accreditation standards
- (11) Research issues
- (12) Patient care concerns

<p>Approved by:</p> <p><u> /s/ laj </u> Lloyd A. Jacobs, M.D. President</p> <p><u> July 8, 2008 </u> Date</p> <p><i>Review/Revision Completed by: Compliance/Privacy Officer</i></p>	<p>Policies Superseded by This Policy:</p> <ul style="list-style-type: none">• <i>01-065 Integrity Line, (Former Health Science Campus Policy, last review date 7/1/03)</i> <p>Initial Effective Date: August 1, 2008 Review/Revision Date: Next Review Date: August 1, 2011</p>
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