

Name of Policy: Protected disclosures through the anonymous reporting line

Policy Number: 3364-15-05

Approving Officer: President

Responsible Agent: Executive Director and Chief Compliance Officer

Scope: All University of Toledo campuses



Effective date:
October 2, 2023

Original effective date:
August 1, 2008

Keywords: Do not capitalize unless a proper noun

	New policy	X	Minor/technical revision of existing policy
	Major revision of existing policy		Reaffirmation of existing policy

(A) Policy statement

According to federal sentencing guidelines, the university of Toledo (“UToledo”) provides procedures for employees to report, in good faith, suspected violations of UToledo policies and federal, state, or local laws and regulations.

(B) Purpose of policy

The purpose of this policy is to provide anonymous reporting line procedures for reporting any activity or conduct that are suspected violations of UToledo policies and procedures, and/or federal, state, or local laws and regulations. For other methods to report see 3364-15-03 Compliance Incident reporting policy, which includes/describes procedures for non-anonymous reporting.

(C) Scope

All UToledo campuses.

(D) Definitions

Protected disclosure: Reports about actual or suspected wrongful conduct engaged in by a UToledo employee, student, volunteer, agent or contractor (who is not the

disclosing individual) based on a good faith and a reasonable belief that the conduct has both occurred and is wrongful under applicable law and/or UToledo policy.

- (2) Wrongful conduct: A violation of UToledo policy; a violation of applicable state and federal laws; or the use of UToledo property, resources or authority for personal gain or other non-university-related purposes except as provided under UToledo policy.
- (3) Retaliation: Disciplinary or adverse action taken against an individual because they made a protected disclosure or participated in an investigation, proceeding, or hearing involving a protected disclosure.
- (4) Anonymous reporting line: The anonymous reporting line is an external service provider that collects and documents information provided on the call. It operates seven days a week, twenty-four hours a day, and three hundred sixty-five days a year.
- (E) Summary procedures

Individuals who report using the anonymous reporting line should follow the procedures outlined below.

- (1) Anonymous reporting line:
 - (a) Either call 1-888-416-1308 or file a report online calling, after the operator answers and provides a greeting, discuss in detail the issue or concern, ask questions, and answer questions the operator may have. The operator will reinforce that the caller does not need to identify him or herself.
 - (b) If online, follow the prompts.
 - (c) Record your password for future reference.
 - (d) Access the site with your password to receive an update, answer questions from the investigator, or obtain a report on actions taken to date. At this time, the investigator can let you know if they need additional time to fully investigate.
- (2) The executive director and chief compliance officer and his/her designees will receive the anonymous reporting line report and review to determine the appropriate department for investigation.
- (3) Upon receiving a report, the individual will receive a response, acknowledging receipt of the report.

- (4) An investigation can take more than ten days, but UToledo will complete the investigation within forty-five days of the receipt of the report unless more time is necessary to thoroughly investigate.
- (5) Upon completion of an investigation, UToledo will take appropriate disciplinary action based on the results of the investigation, up to and including termination.
- (6) UToledo will notify the reporter through the anonymous reporting line database that the investigation has been concluded but UToledo will not disclose the discipline to any employees involved in the investigation.
- (7) For any concerns involving patients and quality of care, contact the joint commission at 1-800-994-6610 or via electronic mail. Report all questions and concerns related to health insurance portability and accountability act violations as soon as possible to 419-383-4270.

(F) Compliance

- (1) All UToledo employees, students, volunteers, agents or contractors will understand and follow UToledo policies and/or federal, state, and local laws and regulations. UToledo encourages individuals to report compliance concerns to maintain its mission.
- (2) UToledo, in compliance with Ohio Revised Code (ORC) §4113.52 (Reporting violation of law by employer or fellow employees) -- is committed to protecting individuals from interference with making a protected disclosure and from retaliation for having made a protected disclosure. See the Non-Retaliation Policy: 3364-15-04.

(G) References

Link to file a report via the Anonymous Reporting Line,

<https://www.mycompliancereport.com/report?cid=UOFT>

UToledo Anonymous Reporting webpage,

<https://www.utoledo.edu/offices/internalaudit/institutional-compliance/Anonymous%20Reporting.html>

The Joint Commission electronic mail address,

complaint@jointcommission.org

ORC §4113.52, Reporting violation of law by employer or fellow employees,

<https://codes.ohio.gov/ohio-revised-code/section-4113.52>

Policy 3364-15-04 Nonretaliation,

<https://www.utoledo.edu/policies/administration/compliance/pdfs/3364-15-04.pdf>

<p>Approved by:</p> <p><i>/s/</i></p> <hr/> <p>Gregory Postel, MD President</p> <p>Date: October 2, 2023</p> <p>Review/revision completed by:</p> <ul style="list-style-type: none">• <i>Executive Director and Chief Compliance Officer</i>	<p>Policies superseded by this policy:</p> <ul style="list-style-type: none">• <i>None</i> <p>Original effective date: <i>August 1, 2008</i></p> <p>Review/revision date: <i>November 19, 2009</i> <i>June 1, 2016</i> <i>February 18, 2020</i> <i>October 2, 2023</i></p> <p>Next review date: <i>October 2, 2026</i></p>
---	--