

VANDERBILT  UNIVERSITY
MEDICAL CENTER

Policy: Integrity Line

Category	Compliance
Approval Date	May 2020
Effective Date	July 2020
Supersedes	July 2019

Applicable to VUMC Areas (and associated Case Managers):

Compliance Finance Hospitals and Clinics Human Resources
 Information Technology Research

Approval Committee(s)

Compliance and Corporate Integrity Committee VUMC Board of Directors

Content Expert(s)

Chief Compliance Officer
Compliance Audit Manager

I. Purpose:

Vanderbilt University Medical Center (VUMC) is committed to the timely identification and resolution of all reported issues that may adversely affect employees, patients, students, other interested parties, or the organization. The VUMC Integrity Line establishes an avenue for employees or interested parties to report potential concerns, including suspected criminal activity and illegal or unethical conduct occurring within the organization, in the event that other resolution channels are ineffective and/or the reporter wishes to remain anonymous.

II. Policy:

Vanderbilt University Medical Center maintains a confidential reporting hotline (VUMC Integrity Line) that patients, employees, contractors, agents or other concerned parties may use to report problems and concerns. The VUMC Office of Healthcare Compliance is responsible for the daily operation of the VUMC Integrity Line.

VUMC policy and the VUMC Code of Conduct prohibit retaliation or intimidation by Workforce Members against anyone who reports concerns. Those who submit reports in good faith via the VUMC Integrity Line will be protected from any form of retaliation or retribution. Reporters to the VUMC Integrity Line may choose to provide personal identification, remain anonymous, or instruct that their identity not be disclosed.

Individuals who are assigned responsibility for the investigation or response to a concern reported through the VUMC Integrity Line (known as “Case Managers”) shall comply with all VUMC policies related to the protection of confidential information.

III. Requirements and Responsibilities:

- A. All reports to the VUMC Integrity Line are addressed in a professional and timely manner, as well as in accordance with all related policies and procedures.
- B. Individuals who report concerns to the VUMC Integrity Line (“Reporters”) are provided a case number to protect their identity. No attempt will be made by VUMC to identify any Reporter who requests anonymity, to the extent allowed by law.
- C. The known identity of any Reporter will be held in confidence to the fullest extent practical or as allowed by law.
- D. Reports deemed potentially unlawful will be reported to the Office of Legal Affairs and relevant authorities and law enforcement:
 - 1. Ongoing crime will be reported to Vanderbilt University Police Department; and
 - 2. Any allegation of abuse to minors will be immediately reported to the relevant law enforcement agency and the Director, Protection of Minors.
- E. When a VUMC Integrity Line report is received, the report is logged and routed by the external VUMC Integrity Line vendor to the designated appropriate Case Manager in accordance with the VUMC Integrity Line case type dissemination matrix maintained by the VUMC Office of Healthcare Compliance. A copy of each report will be received by the VUMC Office of Healthcare Compliance, who upon notification will review the report and confirm assignment to the appropriate Case Manager.
- F. All VUMC Integrity Line report records are logged and assigned a case number upon receipt by the vendor and placed in the care and custody of the VUMC Office of Healthcare Compliance.

- G. Access to VUMC Integrity Line records is limited to authorized users with responsibility for investigation, response, and management of reports.
- H. All VUMC Integrity Line report records are maintained in a central repository under the control of VUMC Office of Healthcare Compliance. Documents used or created to support report review and/or investigation will be maintained by the area(s) or person(s) identified to review and/or investigate the report. All report records and supportive documents are kept in a secure and organized manner and retained in accordance with VUMC records management and retention policies.
- I. Within one business day of receiving a VUMC Integrity Line report, the VUMC Office of Healthcare Compliance or its designee shall:
 - 1. Triage the report to identify and determine the appropriate area(s) or authorized Case Manager to initially review the report;
 - 2. Notify, via email, the area(s) or Case Manager that a report has been received and assigned for their review;
 - 3. Forward the report to the appropriate area(s) or Case Manager for review; and
 - 4. Document the name, title and department of the person identified to review and resolve the report.
- J. Once the assigned Case Manager has received notice that a report has been forwarded for review, actions will be taken to resolve the report. These actions at a minimum shall include:
 - 1. The Case Manager will review the report within one business day of notification of a report;
 - 2. The Case Manager will select an outcome and/or disposition at resolution of an investigation which will convey the VUMC Integrity Line severity rating that should be assigned to a report:
 - a. Level 1: Unintentional Violation of VUMC Policy & Procedure and/or Standards & Regulations of Government Healthcare, or Unsubstantiated Report;
 - b. Level 2: Intentional Violation of VUMC Policy & Procedure and/or Standards & Regulations of Government healthcare;
 - c. Level 3: Concerns Imposing Significant Institutional Impact for VUMC.
 - 3. The Case Manager will use best efforts to investigate and resolve the reported concerns within thirty (30) calendar days from receipt.

- a. In the event that resolution is not possible within thirty (30) calendar days, the Case Manager will document any progress on the report and provide documentation to the VUMC Office of Healthcare Compliance along with sending any needed follow up correspondence to the Reporter via the VUMC Integrity Line system, that the case is still under review.
 - b. If additional information is needed from the Reporter, the assigned Case Manager will request additional documentation from the Reporter.
 - c. The Case Manager will document any progress each thirty (30) days and provide periodic updates to the VUMC Office of Healthcare Compliance until resolution of the case.
 - d. If the Reporter does not respond to the request for additional information within thirty (30) days, and there is insufficient information to complete the investigation, the case may be closed as unsubstantiated.
 - e. If necessary, the assigned Case Manager may solicit review and input regarding the report from additional staff or faculty to support the investigation and resolution.
4. The assigned Case Manager will note the resolution and return documentation to the VUMC Office of Healthcare Compliance demonstrating resolution. The VUMC Office of Healthcare Compliance will ensure the Case Manager closes the case within the VUMC Integrity Line system.
- K. The Office of Healthcare Compliance shall be entitled to request and receive additional information and documentation from Case Managers to confirm that reported concerns have been properly investigated and appropriately resolved.
- L. The VUMC Compliance and Corporate Integrity Committee and the Board of Directors Audit Committee will receive periodic reports regarding VUMC Integrity Line activity. This report will include the total number of reports received, closed, outstanding longer than ninety (90) days, and general results from the VUMC Integrity Line operation. In addition, the report will include any recommendations for improvements or corrective actions arising from the results of the operation and related investigations.

IV. Endorsement:

Compliance and Corporate Integrity Committee May 2020

V. Approval:

Wright Pinson May 2020
CEO of Vanderbilt Health System
Deputy CEO of Vanderbilt University Medical Center
Chair, Compliance and Corporate Integrity Committee

VI. References:

VUMC Integrity Line: <http://www.vanderbilt.edu/integrityline>.