

VANDERBILT  UNIVERSITY
MEDICAL CENTER

Policy: Integrity Line

Category	Compliance
Approval Date	July 2017
Effective Date	July 2017
Supersedes	July 2016

Applicable to VUMC Areas (and associated workforce members):

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 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. Those who report problems and concerns in good faith via the VUMC Integrity Line will be protected from any form of retaliation or retribution by VUMC. Reporters to the VUMC Integrity Line may choose to provide personal identification, remain anonymous, or instruct that their identity not be disclosed.

Workforce members who receive or are assigned responsibilities related to the investigation or response to a concern reported through the VUMC Integrity Line shall comply with all VUMC policies related to the protection of confidential information. The VUMC Office of Healthcare Compliance is responsible for the daily operation of the VUMC Integrity Line.

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. Reporters to the VUMC Integrity Line are provided a case number to protect their identity. No attempt will be made by VUMC to identify any person reporting who requests anonymity, to the extent allowed by law.
- C. The known identity of any person submitting a report to the VUMC Integrity Line 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;
 - 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 workforce member 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 workforce member.
- 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 workforce member to initially review the report;
 2. Notify, via email, the area(s) or workforce member that a report has been received and assigned for their review;
 3. Forward the report to the appropriate area(s) or workforce member for review;
 4. Document the name, title and department of the person identified to review and resolve the report.

- J. Once the assigned workforce member has received notice that a report has been forwarded to him or her for review, actions will be taken to resolve the report. These actions at a minimum shall include:
 1. The workforce member will review the report within one business day of notification of a report;
 2. The workforce member 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 workforce member assigned a report will investigate the report and conclude a resolution of the report within thirty (30) calendar days from receipt.
 - a. In the event that resolution is not possible within thirty (30) calendar days the workforce member assigned the case 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 workforce member will request additional documentation from the reporter.
 - c. The workforce member assigned the case will document any progress each thirty (30) days and provide documentation 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, the case may be closed as unsubstantiated.
 - e. If necessary, the assigned workforce member may solicit review and input regarding the report from additional staff or faculty to support the investigation and resolution.
4. The assigned workforce member 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 workforce member closes the case within the VUMC Integrity Line system.
- K. 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. Approval:

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

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