

Vanderbilt University

Vanderbilt Hotline Policy

Purpose

Vanderbilt University and Vanderbilt University Medical Center (VUMC) are committed to the timely identification and resolution of all issues that may adversely affect employees, patients, students, other interested parties, or the organization. The Vanderbilt Hotline 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.

Policy

Vanderbilt maintains a confidential reporting hotline (Vanderbilt Hotline) 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 Vanderbilt Hotline will be protected from any form of retaliation or retribution by Vanderbilt. Reporters to the Vanderbilt Hotline 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 Vanderbilt Hotline shall comply with all Vanderbilt and VUMC policies related to the protection of confidential information. The VUMC Office of Compliance and Corporate Integrity is responsible for the daily operation of the Vanderbilt Hotline.

Requirements and Responsibilities

- All reports to the Vanderbilt Hotline are addressed in a professional and timely manner, as well as in accordance with all related policies and procedures.
- Reporters to the Vanderbilt Hotline are provided an identification number to protect their identity. No attempt will be made by Vanderbilt to identify any person reporting a concern who requests anonymity, to the extent allowed by law.
- The known identity of any person submitting a report to the Vanderbilt Hotline will be held in confidence to the fullest extent practical or as allowed by law.
- Matters deemed potentially unlawful will be reported to the Office of General Counsel and relevant authorities and law enforcement:
 - Ongoing crime will be reported to Vanderbilt University Police Department;
 - Any allegation of abuse to minors will be immediately reported to the relevant law enforcement agency and the Director, Protection of Minors.
- When a Vanderbilt Hotline report is received, the report will be logged and routed by the VUMC Office of Compliance and Corporate Integrity to the appropriate workforce

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member assigned to the category covering the report.

- All Vanderbilt Hotline report records will be logged and sequentially numbered upon receipt either electronically or manually and placed in the care and custody of the VUMC Office of Compliance and Corporate Integrity.
- Access to Vanderbilt Hotline records is limited to authorized users with responsibility for investigation, response, and management of the reported concerns.
- All Vanderbilt Hotline report records are maintained in a central repository under the control of VUMC Office of Compliance and Corporate Integrity. 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 Vanderbilt and VUMC records management and retention policies.
- Within one business day of receiving a Vanderbilt Hotline report, the VUMC Office of Compliance and Corporate Integrity or its designee shall:
 - Triage the report to identify and determine the appropriate area(s) or authorized workforce member to initially review the report;
 - Notify, via email, the area(s) or workforce member that a report has been received and assigned for their review;
 - Forward the report to the appropriate area(s) or workforce member for review;
 - Document the name, title and department of the person identified to review and resolve the report.
- 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:
 - The workforce member will review the report within one business day of notification of a report;
 - The workforce member assigned a report will investigate the report and conclude a resolution of the reported matter within thirty (30) calendar days from receipt.
 - 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 Compliance and Corporate Integrity for transmittal to the reporter, using the reporter identification number that the case is still under review.

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- If additional information is needed from the reporter, the assigned workforce member will request additional documentation from the reporter, when possible.
 - The workforce member assigned the case will document any progress each thirty (30) days and provide documentation to the VUMC Office of Compliance and Corporate Integrity until resolution of the case.
 - If the reporter does not respond to the request for additional information within 60 days, the event may be closed as unsubstantiated.
 - 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.
- The assigned workforce member will note the resolution and return documentation to the VUMC Office of Compliance and Corporate Integrity demonstrating resolution. The VUMC Office of Compliance and Corporate Integrity will note closure of the report.
- The VUMC Compliance and Corporate Integrity Committee, the University Administrative Compliance Committee, and the Board of Trust Audit Committee will receive periodic reports regarding Vanderbilt Hotline activity. This report will include the total number of reports received, closed, cases outstanding longer than ninety (90) days, and general results from the Vanderbilt Hotline operation. In addition, the report will include any recommendations for improvements or corrective actions arising from the results of the operation and related investigations.

Effective 1 December 2013 and Approved By

- Jeffrey Baiser, Vice Chancellor for Health Affairs – November 13, 2013
- Jerry Fife, Vice Chancellor for Administration – October 18, 2013
- Audrey J. Anderson, Vice Chancellor, General Counsel & Secretary of the University – October 16, 2013

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Related Policies

Vanderbilt Human Resources Policy Manual:

- [HR 002 Anti-Harassment](#)
- [HR 040 False Claims Act and Whistleblower Protection](#)
- [HR 025 Electronic Communications and Information Technology Resources](#)

Vanderbilt Institutional Review Board Policy Manual:

- [IRB II. E. Complaints Regarding Human Subjects Research](#)

Office of the University Registrar:

- [Vanderbilt Student Privacy Statement](#)

Vanderbilt University Medical Center Information Management:

- [IM 10-30.03 Access to Confidential Information](#)
- [IM 10-30.19 Authorization and Access to Electronic Systems and Applications](#)
- [IM 10-30.15 Electronic Messaging of Individually Identifiable Patient and Other Sensitive Information](#)
- [IM 10-30.12 Sanctions for Privacy and Information Security Violations](#)

Vanderbilt University Medical Center Operations Policy Manual:

- [OP 10-10.28 Complaint and Grievance Resolution](#)
- [OP 10-10.24 Occurrence Reporting: Patient & Visitor](#)