

Augusta University

Policy Library

Policy on Reporting a Compliance or Ethics Concern

Policy Manager: Office of Compliance, Ethics, and Risk Management

POLICY STATEMENT

Augusta University, the AU Health System, Inc., AU Medical Center, and AU Medical Associates, recognizes that an ethical culture is essential to accomplish our enterprise mission and goals. Enterprise workforce members are encouraged to report anything that could compromise this ethical culture through their supervisory chain or other applicable avenues, such as, Public Safety, Compliance, Internal Audit, Finance, Human Resources, Faculty Affairs, and Legal Affairs. Our objective is to ensure that everyone has the opportunity to report efficiently any matter that could compromise this ethical environment.

To further this objective, the enterprise provides a confidential hotline service that is available 24-hours a day, 7 days a week. The enterprise Compliance & Ethics Hotline (“Hotline”) service is provided through an independent, external company. **The hotline does not replace any existing reporting mechanisms, policies, or structures noted above, but serves as an additional reporting tool.** The hotline affords faculty, staff, volunteers, interns, students, patients and visitors the option to confidentially report concerns and wrongdoing by telephone or online.

AFFECTED STAKEHOLDERS

Indicate all entities and persons within the Enterprise that are affected by this policy:

- Alumni Faculty Graduate Students Health Professional Students
 Staff Undergraduate Students Vendors/Contractors Visitors
 Other:

1. Conduct to Report

Per USG Policy, all workforce members have an affirmative responsibility to report wrongdoing. Examples of such wrongdoing include, but are not limited to, violations of federal or state law, USG policies, AU policies, AU Health policies, enterprise policies, misuse of University or state resources or assets, conflicts of interest or conflicts of commitment, and any behavior that erodes an ethical culture.

2. Where to Report

- (a) **Emergencies.** In situations where there is an immediate threat to persons or property, or any other emergency, **immediately** contact Public Safety and other parties as deemed appropriate.
- (b) **Supervisory Chain.** Unless otherwise indicated or circumstances make it inappropriate, or there is a fear of retaliation or adverse consequences, workforce members should first report concerns or wrongdoing through their supervisory chain.
- (c) **Office of Compliance, Ethics, and Risk Management.** Compliance staff accepts complaints via phone, email, or walk-in.
- (d) **Human Resources.** Human Resources staff accepts complaints or requests for advice from both employees and supervisors via phone, email, or walk-in.
- (e) **Office of Faculty Affairs.** The Office of Faculty Affairs staff accepts complaints or requests for advice from faculty via phone, email, or walk-in.
- (f) **Office of the Dean of Students.** The Office of the Dean of Students accepts complaints and/or

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requests for advice from students via phone, email, or walk-in.

- (g) **Title IX Coordinator.** The Title IX Coordinator accepts any complaints, concerns, or requests for advice from any staff, student, or faculty via phone, email, or walk-in.
- (h) **Hotline.** Wrongdoing and concerns can also be reported through the hotline via phone or the website and can be done anonymously if any person prefers not to provide their name. Anonymous reports may make it more difficult to investigate any reports or concerns. One can submit any hotline report 24-hours a day, 7 days a week. Information on the hotline can be found on the website of the Office of Compliance.

3. Confidentiality of Reported Concerns

All employees involved with a reported concern, or who learn of a report, should do everything reasonably possible to keep the information confidential; this preserves the integrity of any potential investigation, ensures fairness to all involved, and protects the privacy of employees who filed reports or who are accused of misconduct. This is not meant to curtail employee rights under the law to discuss work-related matters, or to restrict or discourage employees from choosing to report any suspected violations of law or regulation directly to the appropriate state or federal agency. Preserving confidentiality helps minimize retaliation against participants and minimizes disruption in the workplace. Due diligence and reasonable care must be exercised. It is recommended that employees involved in a compliance or ethics report observe the following guidelines during any investigation:

- (a) not discuss the matter with anyone outside their reporting chain unless they first seek guidance from Compliance or Legal Affairs;
- (b) not attempt to discuss or influence another employee’s responses during an investigation;
- (c) take measures to secure and provide any relevant information to the person(s) conducting the investigation; and
- (d) not share information about the incident with other parties without first consulting with the Compliance or Legal Affairs, as applicable.

4. Protection against Retaliation

The reporter of any compliance or ethics concern is protected by all applicable Non-Retaliation Policies.

5. False Reports/ False Information

This policy does not protect an employee who files a false report or who provides information without a reasonable belief in the truth or accuracy of the information. Any employee who knowingly files a false report or intentionally provides false information during an investigation may be subject to disciplinary action up to and including termination.

6. Complaint Management

The Chief Compliance Officer (CCO) is responsible for managing the Hotline and any complaints submitted to the Office of Compliance. The CCO will engage and consult with a “Triage Committee”, composed of representatives from HR, Legal Affairs, Compliance, and Faculty Affairs (when the

complaint includes a faculty member only), on all Hotline complaints for appropriate assignment and investigation.

7. Complaints Involving AU Management

The University System of Georgia Office of Internal Audit will have oversight of any complaint and investigation about a USG President or Vice President.

8. Tracking Complaints

The Office of Compliance & Risk Management will track all complaints to monitor trends or problem areas that may need focused management attention.

Links and Additional Resources

Hotline can be found on the Office of Compliance & Risk Management's website.
<https://www.augusta.edu/compliance/hotline.php>.

Individuals may also use the Ethics and Reporting Hotline for the University System Office to report suspected wrongdoing that is widespread or covers the University System of Georgia as a whole.
<https://bor.alertline.com/gcs/welcome>

- Additional USG reporting contacts are: USG Legal Affairs, USG Vice Chancellor for Organizational Effectiveness, USG Director of Ethics and Compliance, and USG Chief Audit Officer.

RELATED POLICIES

Non-Retaliation Policy (AU)

Protection Against Reprisal for Good Faith Disclosures (AU Health System)

HIPAA Non-Retaliation Policy (AU Health System)

APPROVED BY:

Executive Vice President for Academic Affairs and Provost, Augusta University

Date: 1/20/2021

President, Augusta University

Date: 1/20/2021