

I. REPORTING AND INVESTIGATION**PURPOSE / BACKGROUND**

The University is committed to conducting its affairs in full compliance with the law and with its own policies and procedures. The Institutional Compliance Officer (ICO) is charged by the Compliance Oversight Council (COC) to establish a compliance reporting system and to investigate reports of non-compliance.

The purpose of this Policy is to establish reporting and investigation protocols for the Institutional Compliance Office (CO).

POLICY

The ICO or his/her delegate will maintain a compliance reporting system and initiate a prompt and confidential investigation of questionable practices.

II. PROCEDURE FOR POLICY

A. Reporting System: An effective reporting system makes the reporting individual feel comfortable in seeking guidance and disclosing information without threat of retribution (#ICO-001 – Non-Retaliation/Non-Retribution Policy). Reporting can be made in any of the following ways:

1. Direct access to the ICO or his/her clearly identified delegatee by way of telephone, electronic mail, visit to office, etc.
2. Reporting pursuant to the protocol outlined in **ICO-005, Attachment A**, including a call to or written report to the University Compliance Helpline via 1-877-852-1167 or via the “Compliance Helpline Reporting” option on “ULink.”

B. Reports of Questionable Practices. Reports and complaints of questionable practices may be made by anyone having knowledge or information about a known or suspected questionable practice. Such individuals include, but are not limited to, the CO reviewers, University management, and University employees (faculty and staff). Reports may be made orally or in writing; however, all reports shall be received by the ICO who will coordinate a thorough and confidential investigation. Any report should contain the following information:

1. A factual, objective description of the questionable practice, including dates and times.
2. The name of the individual or department about which the report is being made.
3. If the questionable practice involves potential violation of laws, regulations, or University policies and procedures.

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4. The names of other individuals knowing about the questionable practices.
5. Any other information deemed necessary to a thorough investigation by the ICO and/or other University compliance officials.
6. Insofar as legal and practical, confidentiality of reports will be maintained. Only those personnel who have a need to know will be informed.

C. Investigation: Upon receipt of a report of questionable practice, the ICO or his/her delegate shall act promptly to assign responsibility to the CO and/or other University compliance officials to conduct a confidential investigation. In addition to the information described above, the ICO and/or other University compliance officials may obtain further information necessary to corroborate or dispute the report.

1. In conducting the investigation, University compliance officials shall:
 - a. Gather and review relevant documents, records, and facts;
 - b. Interview University employees or affiliates who may be able to provide relevant information; and
 - c. Review the Non-Retaliation/Non-Retribution policy (#ICO-001), available at <http://louisville.edu/compliance/policies>, with individuals interviewed during the course of the investigation.
2. University compliance officials shall carefully document the investigation in an objective manner.
3. Other individuals or committees shall be involved to assist in the investigation, as determined necessary by University compliance officials.
4. Depending upon the nature of the initial report of questionable practice, University compliance officials may consult University Counsel for advice regarding the investigation.

D. Reports: The ICO or other University compliance officials conducting the investigation shall report to appropriate University management and employees the results of the investigation and whether corrective action will be recommended. The ICO may also report the results of the investigation to the COC.

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**INSTITUTIONAL COMPLIANCE OFFICE
REPORTING PROTOCOL
POLICY # ICO – 005, ATTACHMENT A**

Reporting System:

1. Oral Reports:

- a. The Direct Dial 24-hour University Compliance Helpline is: 1-877-852-1167. Calls to the Helpline will be received by third –party Compliance Risk Specialists. Details of the report will be entered into the vendor’s electronic case management system (ComplianceLine.com or “C-Live”). In managing the C-Live system, the Institutional Compliance Officer (ICO) or his/her delegate will assign the report to the Lead Group Administrator responsible for the investigation as outlined in **ICO-005, Attachment B**.
- b. The ICO may be contacted directly at 502-852-8305.

2. Written Reports:

- a. Written reports may be made by using any narrative format and may be delivered to the ICO as follows:

University of Louisville
Institutional Compliance Office
425 W. Lee St.
Louisville, KY 40208

3. Electronic Reports:

- a. The University Compliance Helpline system includes a web reporting option available to University employees. A report can be submitted via the “Compliance Helpline Reporting” option on “ULink” under the External Links section of the Faculty/Staff tab. Calls to the Helpline will be received by third-party Compliance Risk Specialists. Details of the report are submitted directly into the C-Live system. In managing the C-Live system, the ICO or his/her delegate will assign the report to the Lead Group Administrator responsible for the investigation as outlined in **ICO-005, Attachment B**.
- b. Electronic reports may be submitted directly to the ICO at:
compliance@louisville.edu

University of Louisville
Institutional Compliance Helpline Structure
Policy #ICO-005, Attachment B

