University of Louisville

OFFICIAL UNIVERSITY POLICY

University Employees (administrators, faculty, and staff)

POLICY NAME	EFFECTIVE DATE	POLICY NUMBER
DUTY TO REPORT AND NON-RETALIATION	April 22, 2008	ICO-1.01

POLICY STATEMENT

A. Knowledge of or suspicion of misconduct, violations of law, or other wrongdoing must be immediately reported to University management, the Institutional Compliance Office, other University compliance officials, or the University Compliance Hotline.

B. No employee is permitted to engage in retaliation, retribution, or any form of harassment against another employee for reporting compliance-related concerns.

C. Employees cannot exempt themselves from the consequences of wrongdoing by self-reporting, although self-reporting may be taken into account in determining the appropriate course of action.

Any employee who violates this policy will be subject to disciplinary action, up to and including termination.

REASON FOR POLICY

The University of Louisville is responsible for the proper use of its resources and the public and private support that furthers the realization of its mission. The University is committed to conducting its affairs in full compliance with the law and with its own policies and procedures. Such adherence strengthens and promotes ethical and fair practices and treatment of all members of the University community and those who conduct business with the University. All employees and any other individuals holding positions of fiduciary duty with the University are obligated to perform these duties in compliance with all applicable laws and University policies and procedures.

The purpose of this policy is to encourage and enable good-faith reports by University employees of observed or suspected misconduct or noncompliance with law or with University policies and procedures without fear of retaliation or retribution.

RELATED INFORMATION

- KRS 61.102 – Reprisal against public employee for disclosure of violations of law prohibited, http://www.lrc.ky.gov/krs/061-00/102.pdf
- KRS 205.8465 – Mandatory reporting of violations, Confidentiality, and Prohibition against discrimination or retaliation, http://www.lrc.ky.gov/krs/205-00/8465.PDF
- False Claims Act, 31 U.S. Code § 3730(h) – Civil actions for false claims, relief from retaliatory actions, http://www.gpo.gov/fdsys/pkg/USCODE-2011-title31/pdf/USCODE-2011-title31-subtitleIII-chap37-subchapIII-sec3730.pdf
- American Recovery and Reinvestment Act of 2009 (Pub. L. 111-5) § 1553, Protecting State and Local Government and Contractor Whistleblowers, http://www.gpo.gov/fdsys/pkg/PLAW-111publ5/pdf/PLAW-111publ5.pdf
- Fiscal Misconduct Policy ICO-1.03.
- Reporting and Investigation Procedure ICO-1.01A

DEFINITIONS

University employee: Individuals who are administrators, faculty, staff, and/or student employees.

PROCEDURES

A. All University management must maintain an open-door policy and assure their staff that the system truly encourages the reporting of problems and that there will be no retaliation, retribution, or harassment for doing so.

B. Any employee who believes that he/she has been subject to conduct in violation of this policy should report this concern directly to the Institutional Compliance Officer or University Compliance Hotline with contact information as follows:

Robin Wilcox, Institutional Compliance Officer
University of Louisville
Institutional Compliance Office
425 W. Lee St.
Louisville, KY 40208
Phone: 1-502-852-8305
Fax: 1-502-852-0665
E-Mail: compliance@louisville.edu

Compliance Hotline: 1-877-852-1167

Web- Reporting Option: See "Compliance Hotline Reporting**"** option on ULink found under the External Links section of the Faculty/Staff tab.

The Institutional Compliance Office maintains a compliance reporting system and initiates prompt and confidential investigation of questionable practices. Specific methods for University employees to report suspicion of misconduct, violations of law, or other wrongdoing are outlined in the **Reporting and Investigation Procedure ICO-1.01A**.

C. The Institutional Compliance Officer will begin investigations on all reported concerns within 30 days.

D. Insofar as legal and practical, confidentiality of employee concerns will be maintained. Only those personnel who have a need to know will be informed.

HISTORY

This policy replaces and supersedes Institutional Compliance Office Policy ICO-001 entitled "Non-Retaliation/Non-Retribution."

Revision Date(s): May 20, 2015; August 26, 2014; December 18, 2013; September 26, 2011
Reviewed Date(s): May 20, 2015

ADMINISTRATIVE AUTHORITY	
Sr. VP for Finance and Administration and COO **RESPONSIBLE UNIVERSITY DEPARTMENT/DIVISION** Institutional Compliance Office 425 W. Lee Street, Louisville, KY 40208 Phone: 1-502-852-8305 E-Mail: compliance@louisville.edu	In order to ensure a printed copy of this document is current, please request a current copy at policies@louisville.edu.