Information
Reporting and Investigation

Effective
February 16, 2009

Number
ICO-1.01A

Applicability
This procedure applies to University of Louisville Employees (administrators, faculty, staff, and student employees).

Administrative Authority
Vice President for Risk, Audit, and Compliance

Responsible Unit
University Integrity and Compliance Office
215 Central Avenue, Suite 205
Louisville, KY 40208
Email: compliance@louisville.edu

History
This procedure replaces and supersedes Institutional Compliance Office Policy ICO-005 entitled "Reporting and Investigation."
Revision Date(s): November 29, 2011; March 5, 2013; November 20, 2013; December 18, 2013; November 4, 2014; October 27, 2015; April 25, 2016; December 20, 2017; January 25, 2019; March 4, 2019 (minor revisions); April 8, 2021 (minor revisions); September 6, 2022 (minor revision); April 3, 2023
Reviewed Date(s)**:** November 4, 2014; October 27, 2015; April 25, 2016; December 20, 2017; January 25, 2019

Categories

Reason for Procedure:

The university is committed to conducting its affairs in full compliance with the law and with its own policies and procedures. The purpose of this procedure is to allow for prompt investigations of concerns reported and to establish reporting and investigation protocol in support of the Duty to Report and Non-Retaliation Policy ICO-1.01.

Statement:

The University Integrity and Compliance Office (UICO) maintains a compliance and ethics reporting system and initiates and coordinates a prompt investigation of questionable practices, including compliance and ethical concerns. Confidentiality of reports and investigations will be maintained to the extent legal and practical and will only be shared with individuals who have a need to know. The following procedures establish the UICO's reporting and investigation protocol.

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. Reports may be made orally or in writing; however, all reports shall be provided to the VP for Risk, Audit, and Compliance or UICO for coordination of a thorough and confidential investigation. A 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.
4. The names of other individuals knowing about the questionable practices.
5. Other information deemed necessary to conduct a thorough investigation.

Reporting System

An effective reporting system makes the reporting individual feel comfortable in seeking guidance and disclosing information without threat of retaliation (Duty to Report and Non-Retaliation Policy ICO-1.01). Reporting can be made in any of the following ways:

1. Report directly to the VP for Risk, Audit, and Compliance or the UICO by phone at 502-852-5709, by email compliance@louisville.edu, or send a report by mail to our office:

University Integrity and Compliance Office
215 Central Avenue, Suite 205
Louisville, KY 40208

2. Report through the University's Compliance and Ethics Hotline:

a. Call the hotline:

The Direct Dial 24-hour **University Compliance and Ethics Hotline** is: **1-877-852-1167**. Third party compliance risk specialists will receive and enter the details of the report into the vendor's electronic case management system (mycompliancemanagement.com or "myCM 3.0"). In managing the system, the UICO will review the report and coordinate a prompt investigation.

b. Submit an electronic report to the hotline:

The University Compliance and Ethics Hotline system includes a web reporting option available to university employees. Enter the details of the report directly into the hotline system. In managing the system, the UICO will review and coordinate a prompt investigation.

Conducting the Investigation

Upon receipt of a report of questionable practice, the UICO shall act promptly to review and assign responsibility of investigating the report to the UICO and/or other university compliance official(s). The UICO and/or other university compliance official(s) may obtain further information necessary to corroborate or dispute the report. In conducting the investigation, the UICO and/or university compliance official(s) shall:

1. Gather and review relevant documents, records, and facts;
2. Interview university employees or affiliates who may be able to provide relevant information;
3. Engage with other individuals, departments/units, or committees to assist in the investigation, as determined necessary;
4. Provide awareness about the university's policy on non-retaliation Duty to Report and Non-Retaliation Policy ICO-1.01 to individuals interviewed during the course of the investigation; and
5. Document the investigation in an objective manner.

Depending upon the nature of the initial report of questionable practice, the UICO and/or university compliance official(s) may consult with the Office of General Counsel and VP for Legal Affairs for advice regarding the investigation.

Audit Services has the primary responsibility for coordinating the initial assessment, investigation, and internal reporting of known or suspected fiscal misconduct - see the university's Fiscal Misconduct Policy ICO-1.03.

Cooperation with Investigations

All University Employees must fully cooperate with University investigations and shall not alter or destroy any documentation during the course of an investigation.

Investigation Findings Report

The UICO and/or other university compliance official(s) conducting the investigation shall report to appropriate University management and/or employees the results of the investigation and whether corrective action is recommended.

Procedure Violation

Failure to comply with this procedure or a University investigation, including the preservation of evidence, may be subject to disciplinary action up to and including termination.

Related Information:

Duty to Report and Non-Retaliation Policy ICO-1.01
Fiscal Misconduct Policy ICO-1.03
Institutional Compliance Plan

Definitions:

University Employees - Individuals who are administrators, faculty, staff, and/or student employees.