

Emory University Trust Line Standard Operating Procedures

Purpose

Emory University committed to the timely identification and resolution of all issues that may adversely affect employees, patients, students, other interested parties, or the organization. The Emory Trust Line 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

Emory maintains a confidential reporting hotline (the Trust Line) 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 Trust Line will be protected from any form of retaliation or retribution by Emory. Reporters to the Trust Line may choose to provide personal identification, remain anonymous, or instruct that their identity not be disclosed.

Office or employees who receive or are assigned responsibilities related to the investigation or response to a concern reported through the Trust Line shall comply with all Emory policies related to the protection of confidential information. The Emory University Office of Compliance and the Emory Healthcare Office of Compliance are responsible for the daily operation of the Trust Line.¹

Procedures

Reporting via the Trust Line or Trust Line Online reporting tool

- Reporters who make a report using the Trust Line telephone hotline will speak with a representative of the third-party vendor that administers the service. If a reporter wishes to remain anonymous, the representative will provide him or her with a unique reference code that the reporter can use to call back for a status update or to provide additional information.
- Reporters who make a report using the Trust Line Online reporting tool will provide a written report through an online reporting form. If a reporter wishes to remain anonymous, he or she will be able to set up a unique reference code that can be used to check for status updates or provide additional information.

Report Triaging and Follow-Up

- When a report is received through the Trust Line or the Trust Line Online reporting tool, the Emory Office of Compliance will route the report to the appropriate office (see Appendix A) for follow-up and/or investigation. The Office of Compliance will also investigate reports that fall within its purview.
- All investigations will be conducted by an un-conflicted individual(s).²
- Due diligence will be performed for each reported issue, and the adequate documentation will be maintained of the investigation findings.

¹ This policy only applies to Trust Line reports directed to the Emory University Office of Compliance

² In the event of a potential conflict of interest (i.e., the reported issue is directed at the office, or a member of an office, normally designated to conduct an investigation), Emory will assign an un-conflicted party to perform the investigation. Generally, the un-conflicted party will be selected from a central resource such as Human Resources, the Internal Audit Division, the Office of the General Counsel, or a Compliance Office.

- The office overseeing the investigation will be responsible for making recommendations to management for any disciplinary or corrective actions.
- The office overseeing the investigation will notify the Office of Compliance when the investigation is complete. The office will also report to the Office of Compliance whether the allegations made in the report were substantiated.³

Anonymous Reports

- Anonymous reports must contain certain minimum information in order for them to be investigated. The following information is generally required for an adequate investigation to be conducted:
 - Who – the name(s) of the person(s) against whom the allegations are being made
 - What – a description of the alleged misconduct
 - Where – the location at which the alleged misconduct occurred
 - When – the date, approximate date, or timeframe in which the alleged misconduct occurred
- If an allegation can be investigated without all of the above information, then an investigation will proceed.
- If a report lacks information necessary to commence an investigation, the Office of Compliance will request such information from the reporter through the Trust Line system.
- The office responsible for conducting the investigation may also request more information from the reporter via the Office of Compliance.
- If additional requested information is not provided, then the Office of Compliance will advise the Trust Line administrator that there is insufficient information to permit further investigation.
- For some reports that would otherwise be referred to another office for investigation, and for which certain preliminary information (available from sources other than the reporter) would aid an investigation, the Office of Compliance may obtain such information and provide it to the appropriate office upon referral. For example, if an anonymous reporter alleges a pattern of discrimination in hiring, the Office of Compliance may obtain hiring data from Human Resources and conduct a preliminary analysis before referring the complaint to the Office of Equity and Inclusion.
- Trust Line reporters will be made aware of the minimum information that is required in order to proceed with an investigation.

³ This requirement may not be applicable for some reports to the Trust Line (e.g., Human Resources issues that do not involve policy violations).

Appendix A

Emory University Issue Investigation Responsibility

Members of the Emory community have multiple mechanisms to report issues or concerns to management (e.g., to a supervisor; to a central resource such as HR, General Counsel, Business Officer or Internal Audit; to the Trust Line). Emory has a duty to investigate all issues reported in good faith. The table below provides a summary of the office(s) designated to oversee investigations.

Issue	Designated Investigator
HIPAA	EHC or EU HIPAA Privacy Officer, as delegated
Harassment or discrimination based on protected categories	Office of Equity and Inclusion
Employment/Labor Law	Human Resources
Compensation/pay issues	Human Resources, Internal Audit Division
Misreporting of time and attendance or leave time	
Improper clinical documentation or billing	EHC Office of Compliance Programs, Clinical Trials Billing Office
Improper billing to sponsors (grants and contracts)	Office of Compliance, Internal Audit Division, Finance: Grants and Contracts
Financial fraud, embezzlement, theft or other financial violations	Human Resources, Internal Audit Division
Violations of policies or procedures	Human Resources, Internal Audit Division, or Office of Compliance
Problematic communications between employees	Human Resources
Low morale	
Improper supervisor or employee behavior not covered by policies	
Supervisor incompetence not involving misconduct	
Performance Issues	
Retaliation for reporting potential violations in good faith	Human Resources
"Hostile work environment"	Human Resources

Issue	Designated Investigator
Nepotism, improper hiring practices (excluding discrimination based on protected categories)	Human Resources
Workplace violence	Human Resources, Emory Police Department, Threat Assessment Team
Trustee or Executive Officer misconduct	Office of the General Counsel
Violation of research policies including research misconduct	Office of Compliance
Conflict of Interest	Conflict of Interest Office, Internal Audit Division, Office of Compliance, Human Resources, EHC Compliance Office
Identity theft	Emory Policy Department, Chief Information Security Officer (CISO), Office of Compliance, EHC Compliance, Internal Audit Division
Crimes (as defined in crime policy)	Emory Police Department
Allegations of fraud and abuse in healthcare	EHC Compliance, Office of the General Counsel
Privacy and data breach	EU Privacy Officer, CISO, Breach Notification Team
IT Security Breach	CISO, Breach Notification Team
Patient/family threats against EHC staff	Threat Assessment Team
Sexual assault	Title IX Coordinator(s), Emory Police Department, EHC Human Resources (if involving a patient)