

Name of Policy: Compliance incident reporting Policy Number: 3364-15-03 Approving Officer: President Responsible Agent: Executive Director and Chief Compliance Officer Scope: All University of Toledo Campuses		Effective date October 2, 2023 Original effective date: August 1, 2008	
Keywords			
	<input type="checkbox"/> New policy	<input checked="" type="checkbox"/>	<input type="checkbox"/> Minor/technical revision of existing policy
	<input type="checkbox"/> Major revision of existing policy	<input type="checkbox"/>	<input type="checkbox"/> Reaffirmation of existing policy

(A) Policy statement

The university of Toledo (UToledo) strives to comply with all federal, state, and local statutes. This policy sets forth the procedure that UToledo will use to respond to reports by institutional members or others regarding violations of UToledo

(ii) Institutional members may also submit a written report to the Department of Institutional Compliance.

(d) Anonymous Reporting Line

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(i) UT Toledo has an anonymous reporting line to report any situation without using any Personally Identifiable Information (888-416-1308).

(ii) Refer to the UT Toledo protected disclosures through policy 3364-05 Anonymous reporting line policy.

(e) Direct reporting

Should institutional members feel that administration is not addressing the issues or concerns the institutional member may file Ronce.05 0 Td(n)Tg /TT0 1 Tf -0.

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(G) List of critical areas of compliance concern (not all inclusive)

- (1) Fraud, waste and abuse
- (2) False claims
- (3) Medicare and Medicaid anti-kickback statutes/Stark laws
- (4) Improper claims for clinical trials
- (5) Research, including conformance with provisions of granting agencies
- (6) Provider-based clinics
- (7) Organ acquisition
- (8) Direct graduate medical education/indirect medical education (DGME/IME) reimbursement
- (9) Emergency medical treatment and active labor act ("EMTALA")
- (10) Medicare part D
- (11) Joint commission
- (12) University and medical center policies
- (13) Family education rights and privacy act ("FERPA")
- (14) Health insurance portability and accountability act ("HIPAA")
- (15) Construction
- (16) National collegiate athletic association ("NCAA")
- (17) Public records laws
- (18) Ohio ethics laws
- (19) Discrimination laws
- (20) Federal financial aid
- (21) 42 CFR part 2 ("SAMHSA")

(H) References

Policy 336415-04 Nonretaliation

<https://www.utoledo.edu/policies/administration/compliance/pdfs/336415-04.pdf>

Policy 336415-05 Anonymous reporting line

<https://www.utoledo.edu/policies/administration/compliance/pdfs/336415-05.pdf>

Policy 336427-127, Mandatory training

<https://www.utoledo.edu/policies/administration/humanresources/pdfs/336427-127.pdf>

Approved by:

/s/

Gregory Postel, MD
President

Date: October 22, 2023

Review/revision completed by:

- *Executive Director and Chief Compliance Officer*

Policies superseded by this policy

- *None*

Original effective date:

August 1, 2008

Review/revision date:

June 1, 2016

February 18, 2020

October 2, 2023

Next review date:

October 2, 2026