I. Policy Statement
   a. This policy outlines the process for reporting a suspected violation of policy, law, Code of Conduct, or other compliance concerns via the University of Missouri Ethics and Compliance Hotline.¹

II. Definitions
   a. Priority “A” Level Reports: Reports that require immediate review and/or action due to an allegation of immediate threat to person, property or environment.
   b. Priority “B” Level Reports: Reports of time-sensitive information that may require prompt review and/or action.
   c. Priority “C” Level Reports: Reports that do not require immediate action.

III. Process/Content
   a. The University of Missouri System (UM), established the “Ethics and Compliance Reporting Hotline Policy” which provides an anonymous avenue for reporting suspected incidences of financial, ethics or compliance abuses at any of the campuses or the health system. As an operating unit of UM, MU Health follows this UM policy. The reporting system is both web and telephone based and is available on a 24-hour/365-day basis for individuals to report known or suspected incidences of wrongdoing involving University operations and transactions. The Hotline can be accessed by calling a toll-free number, 1-866-447-9821, or logging onto the link, https://www.compliancehelpline.com/UM.jsp.
   b. Reporting Issues and Concerns
      i. All MU Health employees have an affirmative responsibility to timely report alleged wrongdoing. Wrongdoing is defined under this policy as a violation of MU Health or UM System policies, rules and/or regulations, campus-specific, state or federal law, and violations of ethical and

professional conduct, and fraud, waste or abuse. Examples of wrongdoing include, but are not limited to, violations of the MU Health Code of Conduct, patient privacy and data security breaches, discrimination, harassment, research misconduct, academic misconduct, and policy violations.

c. Non-retaliation for reporting
   i. MU Health policy forbids retaliation against employees, faculty members or staff who report concerns in good faith. Making a report will not put your job at risk. Anyone who retaliates against the person reporting is subject to disciplinary action. If you violate a law, policy or standard, you will be held accountable even if you report it.
   ii. The MU Health Chief Compliance Officer (CCO) is the designated Lead Case Manager for MU Health under the UM policy, and will review each report received from the UM Hotline Oversight Committee and determine additional assignments to facilitate and ensure coordination of the investigative effort, in compliance with this policy. The CCO is responsible for ensuring administration, oversight, training and competence of investigative staff under this policy.

d. MU Health Hotline Committee
   i. The MU Health Hotline Committee, which includes the CCO, Chief HR Officer or designee, Chief Quality Officer, Chief Nursing Officer or designee will be responsible for reviewing hotline investigative responses and closing the MU Health Hotline reports. Members of the MU Health Hotline Committee shall meet at least monthly to review each open report to monitor the quality and timeliness of the investigation conducted, and to ensure that the matter is appropriately addressed and resolved.

e. Confidentiality
   i. All employees involved in the process of receiving and investigating reports of wrongdoing must exercise due diligence and reasonable care to maintain the integrity and confidentiality of the information received. All investigative employees must ensure they comply with state and federal laws regarding whistleblower protection.

f. Hotline Compliant Response Process
   i. Investigation Timelines: Priority “A” level reports are immediately referred to law enforcement. Generally, investigations for Priority “B” level reports should be completed within 30 days of receipt of the report, and Priority “C” level reports within 60 days of receipt. The CCO is
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expected to notify the UM Hotline Oversight Committee/Coordinator in a timely manner when it is known that the investigation will take longer than the expected time frame.

ii. Communication with the Reporter/Complainant: A response to the reporter/complainant shall be made in the Navex Integrilink System (Navex) by the UM Hotline Oversight Coordinator, acknowledging the receipt of the report and the time frame for expecting communication about the status of the investigation. Status updates and resolution shall be reported on the Navex system for access by reporters.

iii. Closing the Report: Once the investigation has been completed and properly documented, the CCO in conjunction with the MU Health Hotline Committee shall submit the investigative documentation and resolution to the Hotline Oversight Committee. The UM Coordinator will be responsible for closing the report in Navex.

g. Document Retention
   i. Documentation to support actions taken in response to Hotline reports is maintained for at least seven (7) years, then may be purged/destroyed in accordance with applicable record retention policies, and federal and state regulations.

h. Tracking and Analyzing Reports
   i. The MU Health Office of Corporate Compliance will analyze, track and monitor reports and outcomes to determine trends or problem areas across the health system, identify organizational risks, and make recommendations to operations, administration, or the Board through the Executive Compliance Committee. Any matter requiring external reporting to regulatory, law enforcement, or other agency will be communicated to General Counsel for proper reporting and disclosure.

i. Access to the Ethics and Compliance Reporting Hotline and Other Reporting Processes
   i. The web address and phone number to the Ethics and Compliance Hotline is displayed in each MU Health entity, on the MU Health system website, and displayed in other prominent locations accessible by faculty, staff, students, vendors and the public.

j. Training and Education
   i. New employees shall be notified of the availability and purpose of the Ethics and Compliance Hotline. All members of management will reinforce the availability and purpose of the Ethics and Compliance Hotline with faculty, staff, and students/trainees on a regular basis. The
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annual Code of Conduct training contains instructions regarding how to access the Ethics and Compliance Hotline.

IV. Attachments
   a. Not Applicable.

V. References, Regulatory References, Related Documents, or Links
   a. If you have any questions or would like to discuss this policy further, please contact the MU Health Office of Corporate Compliance.
      i. Phone: 573-884-0632
      ii. Email: compliancec@health.missouri.edu
   b. Ethics and Compliance Reporting Hotline phone number: 866-447-9821
   c. Ethics and Compliance Reporting Hotline web link: https://www.compliancehelpline.com/UM.jsp
   d. MU Health Code of Conduct Manual