



NYU MEDICAL CENTER POLICIES

APPROVED:

REFERENCE NUMBER:

EFFECTIVE DATE:

TITLE: Compliance Communication

**SCOPE: NYU School of Medicine
NYU Hospitals Center**

PURPOSE: To provide guidance on the open communication that is a necessity in maintaining an effective compliance program and reducing any potential for fraud abuse and waste.

POLICY:

A. Questions.

At any time any employee or physician may seek clarification or advice from the Compliance Officer or members of the Steering Committee in the event of any confusion or question with regard to this Program or any element of this Program or any Medical Center policy or procedure related to this Program. Questions and responses should be documented and, if appropriate, shared with other employees for informational and educational purposes. Employees are encouraged to contact the Compliance Officer and any member of the Committee and for this purpose the Compliance Officer will develop or cause to be developed publicity and notices regarding his or her name, location and e-mail address and the names of members of the committee and their location.

B. Reporting.

Employees or physicians who are aware of or suspect acts of fraud, abuse or waste or violations of the standards of conduct are required to report such acts or violations. Several independent reporting paths are available:

1. Employees may but are not required to report to their supervisor or department director or manager. If a supervisor or manager receives such a report, he or she will promptly pass on the report to the Compliance Officer or member of the Steering Committee.
2. An employee or physician may report directly to the Compliance Officer or to a member of the Steering Committee.
3. The Medical Center has contracted with an independent company to operate a 24-hour, 365-day hotline known as the "Compliance Helpline" (866-NYU-1212). Employees and physicians may use this line anonymously at any time, day or night. The phone number of the Helpline has been posted at various places throughout the Medical Center and employees will be reminded of the number and of their duty to report actual or suspected wrongdoing through training, posters, the intranet and other methods. Employees are encouraged to use the Helpline.
4. Employees and physicians may also call the hotline of the Office of the Inspector General of the Health and Human Services Department, 1-800-HHS-TIPS (447-8477). The Compliance Officer will post this number in one or more prominent locations in the Medical Center.



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C. Confidentiality.

Reports received will be treated confidentially to the extent possible under applicable law. However, there may be a time when an individual's identity may become known or have to be revealed if governmental authorities become involved or in response to subpoena or other legal proceeding.

D. Non-Retaliation.

There will be no reprisals or retaliation against any employee who in good faith reports acts or suspected acts of fraud, abuse or waste or violations or suspected violations of the standards of conduct or other wrongdoing or misconduct. However, an employee who makes an intentional false report or a report not in good faith may be subject to disciplinary action.

E. Documentation.

The Compliance officer will maintain a record of reports of violation of this Program, or of the standards of conduct, or of relevant law or regulations, received by the Compliance Officer. The compliance Officer will periodically furnish a summary of such reports to the Dean and CEO, the Compliance Committee and the Audit and Compliance Committee of the Board of Trustees.