

**UCLA HEALTH SYSTEM
CODE OF CONDUCT**

IV. REPORTING AND INVESTIGATING VIOLATIONS

What to Do If You Have a Concern about a Potential Violation or Have a Question About Your Responsibilities under the UCLA Medical Sciences Compliance Program

When an employee has a question about his or her responsibilities under the Compliance Program or is reporting a potential or suspected violation, he or she should discuss these matters with his or her immediate supervisor, within their normal management reporting structure. If an employee does not feel comfortable discussing the issue with his or her supervisor, he or she should discuss the issue with a higher-level manager. If employees are not comfortable communicating these matters within his or her normal organization structures, the appropriate Compliance Director will be available or, as an alternative, employees can contact the CCO or the UCLA Medical Sciences Confidential Compliance Line.

Confidential Compliance Line

UCLA Medical Sciences has established a Confidential Compliance Line at (1-800-296-7188) for use by employees to ask questions or report concerns regarding potential violations of the Compliance Program. This process should be utilized when employees are not comfortable communicating these matters within their normal organization structures. Available 24 hours a day, 365 days a year by phone, the toll-free Confidential Compliance Line is contracted through an external vendor and staffed by trained professionals.

The purpose of the Confidential Compliance Line is to provide a confidential / anonymous means for individuals to report non-compliant activities, or raise concerns about behavior within the context of the Program. Calls will not be recorded or traced. No retaliation against individuals raising issues through any reporting mechanism, including the Confidential Compliance Line, will be permitted.

Continue to Adhere to Normal Procedures, Where Possible

The purpose of having the Confidential Compliance Line, the CCO and Compliance Directors available to answer questions and receive reports of potential violations is to give an employee a reliable and secure means, to the extent possible, to raise issues about the Program when an employee is not comfortable raising issues through the normal management channels. These vehicles are not intended to circumvent normal procedures. Ordinarily, therefore, employees should avail themselves of procedures specifically designed to handle a particular situation.

What Happens After You Notify Your Supervisor, the CCO or the Message Line About Your Concerns?

Upon receiving a report of a potential violation(s), UCLA Medical Sciences will initiate a prompt review. If appropriate, the Compliance Officer will work with management personnel to review the information and determine the suitable course for resolution. Alternatively, the Compliance Officer will review the matter through the Compliance Department, or work with other University departments to investigate the matter and determine the appropriate next steps. The findings and conclusions regarding the investigation shall be reported to the Compliance Committee and, as appropriate, to external agencies having jurisdiction pursuant to the University of California's "Whistleblower Policy" and "Whistleblower Protection Policy."

The first goal of any review of information brought forward will be to determine the facts of whether a violation of the Program has taken place. Once this information is in place, the Compliance Officer, working with appropriate managerial staff, will pursue any necessary corrective actions. Should these steps fail to address the issue, the Compliance Officer will work with the following bodies within the UCLA Medical Sciences to determine appropriate corrective actions or disciplinary steps:

- Medical Staff (UCLAMC, Santa Monica – UCLAMC, UCLA NPH)
- UCLA Medical Group
- David Geffen UCLA School of Medicine at UCLA Faculty Executive Committee
- UCLA Medical Sciences Human Resources/School of Medicine Human Resources

Any disciplinary actions will follow procedures established by University policy and applicable laws and regulations.

It is important to remember that although an employee has the option to make a report anonymously, employees should understand that during the course of a follow-up review or investigation, the reporter's identity may be learned as a natural consequence of the review or investigation.