

601 Elmwood Ave      1000 South Ave      77 Ridgeland Rd  
 Rochester, New York      Rochester, New York      Rochester, New York  
 14642                      14620                      14623

**Document Title: Reporting of Non-Compliant Behavior**

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## **TITLE: Reporting of Non-Compliant Behavior**

### **I. POLICY**

All URMC employees and affiliated professional staff are expected to conduct themselves according to the highest ethical standards and comply with all state and federal regulations, URMC policies and, for Highland employees, Highland Hospital policies.

All URMC employees and professional affiliates have the responsibility of reporting any suspected illegal or non-compliant activities to their supervisor, the departmental compliance associate and / or the Compliance Office. Examples of reportable incidents are:

- Breach of patient confidentiality (ie HIPAA, PHI, etc)
- Breach of electronic medical record
- Inaccurate record keeping
- Inappropriate billing practices
- Research fraud
- Concerns of non-compliance
- Identity Theft

Staff suspecting non-compliant activities can report the incident without fear of retaliation by:

- Contacting their supervisor
- Contacting the department's compliance associate; 273-5626 or 341-8110.
- Contacting the Compliance Office; 275-1609 or [compliance@urmc.rochester.edu](mailto:compliance@urmc.rochester.edu).
- Calling the **INTEGRITY HOTLINE** at **756-8888** – this phone line is dedicated; callers may remain anonymous, if desired.

### **II. PURPOSE**

Reporting non-compliant behavior in the workplace.

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### III. RESPONSIBILITIES

Medical Directors & Lab Managers	Supports development of this policy and revise as needed
Compliance Associate	Supports the development of this policy.
All Laboratory Staff	Follow the policy

### V. REFERENCES

- OIG Compliance Plan Guidance for Clinical Laboratories, August 1998
- URMCC Compliance Plan web page at [www.urmc.rochester.edu/urmc/compliance/plan.html](http://www.urmc.rochester.edu/urmc/compliance/plan.html)