

Questions and Answers About the Montana University System (MUS) Compliance Hotline

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About the MUS Compliance Hotline

What is the MUS Compliance Hotline?

The MUS Compliance Hotline is an option for reporting suspected compliance concerns at any MUS campus using either the hotline website or telephone. Reports can be filed anonymously to protect the identity of the reporting employee, student, or member of the general public.

The hotline is supported by a reporting tool called EthicsPoint, that was created by a third-party service provider, Navex Global. EthicsPoint serves as an intermediary between the reporter and the respective MUS campus official receiving the report. Therefore, reported information is held securely and confidentially on Navex Global's systems.

Why do we need a tool like the MUS Compliance Hotline?

Board of Regents policy encourages all employees, students, and volunteers, acting in good faith, to report suspected legal, regulatory or policy misconduct or other concerns through the MUS Compliance Hotline. Ideally, you would bring any concerns forward to your direct supervisor, Human Resources office or other appropriate MUS campus official. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. We would rather you report anonymously than keep the information to yourself.

In addition, Federal guidelines for compliance programs include establishment of a channel of communication that permits anonymous reporting of potential regulatory compliance problems and concerns.

Won't this tool just encourage individuals to gripe or to make wild charges about others?

The MUS Compliance Hotline provides a channel of communication for good faith reports of suspected legal, regulatory and policy misconduct and other concerns. A good faith report means an allegation made with the honest belief that violations may have occurred. A false allegation is a report that is made with reckless disregard for or willful ignorance of facts that would disprove the allegation. Board of Regents' MUS Compliance and Reporting Hotline policy states that faculty or staff making false allegations may be subject to disciplinary action, up to

and including termination, and students, in a non-employment setting, may be subject to charges under the student conduct code.

What about reprisal or retaliation for making the report?

Board of Regents' MUS Compliance and Reporting Hotline policy states that no individual who reports suspected legal, regulatory, or policy violations in good faith will suffer harassment, threats, or adverse employment or education consequences solely because a report was made through the MUS Compliance Hotline. Any person who retaliates against any individuals because they made a report may be subject to disciplinary action, up to and including termination or expulsion.

Reporting – General

What type of situations should I report?

The MUS Compliance Hotline is designed for faculty, staff, students, and the general public to report suspected legal, regulatory or policy misconduct and other concerns in the following areas:

- Accounting and Financial
- Athletics
- Discrimination or Harassment
- Health and Safety
- Human Resources
- Information Security and Technology and
- Research.

The MUS Compliance Hotline is not to be used for reporting academic matters or non-academic student conduct matters, which should be reported directly to the campus' academic affairs or student affairs offices, respectively.

I'm not sure if what I've observed or heard is a violation of law, regulation or policy, but it just doesn't look right to me. What should I do?

File a report. The MUS Compliance Hotline can help you prepare and file your report so it can be properly understood. We would rather you report a situation that turns out to be harmless than let possible violations go unchecked because you were not sure.

Where do these reports go? Who can access them?

Reports entered through the MUS Compliance Hotline are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports

available only to specific individuals within the organization who are charged with evaluating the report, based on the type of violation and MUS campus where the incident occurred. Each of these report recipients has had training in keeping these reports in the utmost confidence.

What happens after a report is filed?

EthicsPoint notifies the designated university official that there is a report posted to a secure access site on the EthicsPoint system. The university official reviews the report and begins the process of determining the facts and any appropriate action.

In some cases, no action will be taken. For example, anonymous reports must have sufficient corroborating evidence to justify the commencement of a review.

What if I remember something important about the incident after I file the report? Or what if the university has further questions for me concerning my report?

When you file a report at the MUS Compliance Hotline website or through the call center, you receive a unique username and are asked to choose a password. You can return to the MUS Compliance Hotline again either by the hotline website or telephone and access the original report to provide additional information or answer questions posed by a university. We strongly suggest that you return to the site in the time specified to answer follow-up questions.

What if I lose my Report Key or forget the Password I created?

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.

Reporting – Security and Confidentiality

Are anonymity and confidentiality guaranteed?

We cannot guarantee either anonymity or confidentiality, but the MUS Compliance Hotline is designed to provide maximum potential for both. In some situations (e.g., research misconduct), substantive investigation of a complaint may not be possible unless the reporter is willing to waive anonymity.

It's my understanding that any report I send from a university computer generates a server log that shows every website that my PC connects with, and won't this log identify me as a report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during business hours.

Can I file a report from home and still remain anonymous?

EthicsPoint's experience has been that fewer than 12% of reports are generated during business hours. Most people prefer to report from the comfort of their home after hours and on the weekend.

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

Is the toll-free telephone line confidential and anonymous too?

The MUS Compliance Hotline telephone reporting service is also operated by EthicsPoint and is available toll-free at 855-753-0486, 24 hours a day, 365 days a year. The caller will be asked to provide the same information that he or she would provide in a web-based report. EthicsPoint safeguards reports received through the telephone just as it does those received through the Internet.

It's my understanding that campuses' telephone logs show the phone numbers accessed through campus telephone lines.

Campuses' telephone system logs do show telephone numbers accessed through campus telephones. An individual who wishes to maintain maximum anonymity in using the telephone MUS Compliance Hotline service should make the toll-free telephone call using a non-university telephone.

I'm concerned that the information I provide through the MUS Compliance Hotline will ultimately reveal my identity. How can you assure me that won't happen?

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith ..." or "In my 33 years ..." If the reporter is the only individual who could possibly know the reported facts, there may be an unintended deductive disclosure of the reporter's identity. The MUS campus will honor and protect the reporter's request for confidentiality to the extent possible as it fulfills its obligations in responding to the report.