

About EthicsPoint

Reporting – General

Reporting Security & Confidentiality

Tips & Best Practices

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global. It hosts IU Health's TrustLine where team members can anonymously report problems and/or issues of concern such as questionable billing practices, fraud, abuse, patient's rights, conflict of interest, confidentiality, bribes and other misconduct in the workplace.

Why do we need a TrustLine system?

- Our team members are our most important asset. Trust in the work environment is important in the care IU Health delivers to patients and the work we do alongside our colleagues. The TrustLine is a channel of communication where unethical behaviors may be reported in a confidential manner for follow-up by leadership. Ethical behaviors, as presented in the IU Health Standards of Conduct for Business Practices policy, are key to a safe work environment and for providing quality patient care.
- An effective reporting system augments our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using either the Internet or the telephone?

Yes. The TrustLine enables you to file a confidential, anonymous report via either the telephone or the Internet.

- By telephone at 1-888-Trust36 (1-888-878-7836)
- Online at iuhealth.ethicspoint.com

What types of situations should I report?

The TrustLine system allows team members, vendors, and patients to report any violation of our stated responsibilities in the IU Health Standards of Conduct for Business Practices policy, Conflict of Interest policy, or other concern you may have.

If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe some behavior that you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have made the TrustLine available to you. We would rather you report anonymously than keep the information to yourself.

Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. And corporate misconduct can threaten the very existence of an entire company like IU Health.

Does management really want me to report?

We certainly do. In fact, we *need* you to report. You know what is going on at IU Health - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on IU Health, our team members and our patients. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the TrustLine secure server. NAVEX Global makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

Isn't this system just an example of someone watching over me?

No. The TrustLine is a positive aspect of our overall philosophy that allows us to ensure a safe, secure and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with. Won't this log identify me as the report originator?

The TrustLine does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to the TrustLine is available.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment through the secure website at iuhealth.ethicspoint.com.

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

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 TrustLine system strips away Internet addresses so that anonymity is totally maintained.

I am concerned that the information I provide the TrustLine will ultimately reveal my identity. How can you assure me that will not happen?

- Individuals may contact the TrustLine anonymously and be assured that legitimate concerns are investigated confidentially without disclosing their identity, up to the limits of the law. Specifically, these limits may include an affirmative obligation for the organization to report a violation of law if the caller provides material evidence that one may have occurred, as well as the obligation of the organization to cooperate with government investigations. However, because of the nature of some of the allegations identified, IU Health cannot guarantee that a caller's identity will never become known.
- No disciplinary action will be taken because a team member reports valid privacy, security, billing, safety, or quality of care concerns or issues to the TrustLine or to any regulatory agency such as the Centers for Medicare and Medicaid Services, the Department of Health and Human Services' Office for Civil Rights, or the Joint Commission.
- IU Health understands that individuals may not report concerns if they feel that they will be subjected to retaliation, retribution or harassment for reporting the concern. No IU Health supervisor, manager, or team member is permitted to engage in retaliation, retribution or any form of harassment directed against an individual who reports a concern. Any supervisor, manager, or team member who engages in retaliation, retribution, or harassment is subject to discipline up to and including termination. Individuals suspected of engaging in acts of retaliation or retribution against a caller should be immediately reported to Human Resources or Corporate Compliance.

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

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and a non-IU Health employee will interview you and type your responses into the

TrustLine website. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report to identify yourself, if you wish. Your identity will remain confidential unless it would benefit the investigation to have more specific information from you. If you would like someone to contact you, please say so in your report.

Tips & Best Practices

I am aware of some individuals acting unethically, but it doesn't affect me. Why should I bother reporting it?

IU Health's commitment to its Promise and Values promotes ethical behavior. All unethical conduct, at any level, ultimately hurts IU Health, team members and patients, including you. All IU Health team members are responsible for promptly reporting, through proper channels, actual or potential wrongdoing, including actual or potential violations of law, regulation, policy, procedure, or Standards of Conduct for Business Practices. These channels should begin with the team member's immediate supervisor or manager and follow the normal chain of command to higher-level management.

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

If you feel comfortable, report the concern to your immediate supervisor or manager and follow the normal chain of command to higher-level management. If you are uncomfortable reporting the concern to your manager, you may file a report to the TrustLine. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked. Remember, no disciplinary action will be taken because a team member reports an actual or potential concern.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The TrustLine system and report distribution ensure that implicated parties are not notified or granted access to reports in which they have been named.

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

When you file a report to the TrustLine, you receive a unique, randomized number called a “Report Key” and are asked to choose a password. You can return to the TrustLine system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative. We strongly suggest that you return to the site in the time specified to answer any questions posted by an IU Health representative that would ensure a more thorough investigation. You and IU Health now have entered into an “anonymous dialogue,” where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All TrustLine correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

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.

Can I still file a report if I don't have access to the Internet?

You can file a TrustLine report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the TrustLine at 1-888-Trust36, which is available 24 hours a day, 365 days a year.