



# TEXAS TECH UNIVERSITY HEALTH SCIENCES CENTER

## Operating Policy and Procedure

HSC OP: 52.04, Report & TTUHSC Internal Investigation of Alleged Violations , Non-Retaliation

PURPOSE: The purpose of this HSC Operating Policy/Procedure (HSC OP) is to provide 28055-PA-01-0001-001

TTUHSC Affiliate means independent 0.262 MIT 05

[Ethicspoint.](#)

Employee, Involuntary Termination and Voluntary Termination are the same as defined in TTUS Regulation 07.07, Employee Conduct, Coaching, Corrective Action and Termination.

Fraud has the same meaning as in TTUS [Regents' Rule 07.03.](#)

Good Faith means that an individual must believe he/she is reporting conduct that constitutes a violation of law or policy, and the belief must be reasonable based on the individual's training and experience.

Investigation means the formal development of a factual record based on review of documents, testimony and other information gathered that leads to a conclusion that there is or is not a Violation.

Retaliation in the context of reporting Allegations of a Violation includes, but is not limited to, involuntary termination of or voluntary termination from employment or affiliation with TTUHSC, forced resignation, elimination of the position, discrimination in the terms of employment or affiliation with TTUHSC, interference with employment or affiliation with TTUHSC, harassment, threats of retaliation, unwarranted disciplinary action or any action that affects a TTUHSC employee's compensation, promotion, demotion, transfer, work assignment, or performance evaluation.

Source means a TTUHSC Employee or Affiliate or other person who makes a Good Faith Allegation of a suspected or actual Violation pursuant to this OP and/or [HSC OP 52.03, Fraud and Misconduct Hotline](#) - Ethicspoint.

Subject means an individual(s) who is the focus of an Investigation for an alleged

Violation.

Violation includes any action or activity by a TTUHSC employee or Affiliate that constitutes fraud, waste or abuse, violation of federal or state laws, regulations, rules, TTUS Regents' Rules, and/or TTUHSC policies and procedures. This includes, but is not limited to,

Violations to minimize risk to TTUHSC and its operations. See, [Regents' Rule 07.03](#), Fraud Policy. Allegations should focus on facts and include sufficient information to assist in evaluating the nature, extent and urgency of the Investigation.

- b. Anonymous Allegations may be made, but must include sufficient information to support initiating an Investigation.
- c. To the extent possible, submitting a written Allegation is encouraged, as well as reporting in a timely manner in order to permit TTUHSC an opportunity to review the Allegation(s) and take necessary action as appropriate.

3. Confidentiality.

a. Confidentiality of the identity of the Source(s), Subject(s) and Witness(es) shall be maintained to the extent possible within the limitations of the law, TTUHSC policy and the HSC OPs. Confidentiality shall be maintained in all reports and written reports.

- 1) Unless required by law or necessary in the context of reporting the Investigation, the Source's identity shall not be disclosed in the written investigative report.

- b. Information provided or obtained as part of an Investigation shall be considered confidential in accordance with HSC OPs and state law.

B. Investigation Oversight Areas

After an Allegation is received, it will be investigated by a department or office referenced below authorized to conduct investigations of alleged violations, unless otherwise addressed in specific HSC OPs. These departments and offices include, but are not limited to the following:

Office of the General Counsel, Office of the Inspector General, Office of the Chief Financial Officer, Office of the Chief Information Officer, Office of the Chief of Staff, Office of the Chief of Compliance, Office of the Chief of Risk Management, Office of the Chief of Security, Office of the Chief of Quality Improvement, Office of the Chief of Patient Safety, Office of the Chief of Academic Affairs, Office of the Chief of Medical Affairs, Office of the Chief of Nursing Affairs, Office of the Chief of Allied Health Affairs, Office of the Chief of Public Health Affairs, Office of the Chief of Community Health Affairs, Office of the Chief of Health Equity Affairs, Office of the Chief of Health Services Research, Office of the Chief of Health Services Evaluation, Office of the Chief of Health Services Improvement, Office of the Chief of Health Services Innovation, Office of the Chief of Health Services Research, Office of the Chief of Health Services Evaluation, Office of the Chief of Health Services Improvement, Office of the Chief of Health Services Innovation.



determined that such disclosure could result in actual or perceived interference of the Investigation. In such cases, the Subject's immediate supervisor shall be informed of the Allegations, unless it is determined that such disclosure could result in actual or perceived interference of the Investigation, in which case a senior administrator will be notified.

- b. Shall cooperate with investigators, to the extent their cooperation will not undermine protection against self-incrimination under federal or state law.
- c. Shall not discuss the contents of the Allegation and/or information related to the Investigation with other Employees or TTUHSC Affiliates (including the identities of Subjects or Witnesses)b.

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