SIGNIFICANT EVENTS REPORTING

Policy

This policy is designated to implement a reporting process by which the Health Science Center (HSC) will ensure that significant events are reported to UT System in a timely manner in accordance with UTS 178 Required Reporting of Significant Events.

HSC leadership from all areas of the Institution shall be responsible for reporting significant events, reviews, investigations, and reports of noncompliance with federal or state statutes and regulations, or UT System policies to the Office of Regulatory Affairs and Compliance. The Office of Regulatory Affairs and Compliance shall serve as the institutional point of contact and is responsible for notifying the UT System wide Office of General Council of significant events related to the HSC. U.T. System will then notify the Board of Regents of significant events it determines necessary.

This reporting is supplemental to already existing communications strategies and any existing communication processes to UT System should continue.

Failure to comply with this policy may result in disciplinary action up to and including termination.

Definitions

SIGNIFICANT EVENTS – matters including, but not limited to, reports of death or serious injury occurring on campus or involving a member of the university community; allegations of fraud or fiscal loss of $100,000 or more; allegations involving impropriety or failure to follow law or policy by the Chancellor, a System Executive Vice Chancellor or Vice Chancellor, the General Counsel to the Board, or the System Chief Audit Executive; or an institutional president or vice president; allegations of sexual misconduct; allegations related to the care or safety of minors; material concerns expressed by federal and state oversight agencies; security breaches involving confidential records; potential media reports that may impact the reputation of the university; or matters that reflect a systemic threat to patient safety.
Effective: November 2014

Policy 10.1.14 Significant Events Reporting

Responsibility: Chief Compliance Officer

What Should Be Reported

Executive officers should report significant allegations, reviews, investigations, and reports of noncompliance with federal or state statutes or regulations, or UT System or HSC policies. These significant events may include, but are not limited to:

1. reports of death or serious injury occurring on campus or involving a member of the university community (Please note: Generally this will exclude patient deaths unless there are extenuating circumstances.);

2. allegations of fraud or fiscal loss of $100,000 or more;

3. allegations involving impropriety or failure to follow law or policy by the Chancellor, a System Executive Vice Chancellor or Vice Chancellor, the General Counsel to the Board, or the System Chief Audit Executive; or an institutional president or vice president;

4. allegations of sexual misconduct;

5. allegations related to the care or safety of minors;

6. material concerns expressed by federal and state oversight agencies;

7. security breaches involving confidential records;

8. potential media reports that may impact the reputation of the university; or

9. matters that reflect a systemic threat to patient safety.

Reporting Procedure

I. Initial Reports

a. Designated Employees. HSC executive officers who oversee such functions as business affairs, compliance, audit, legal affairs, information security and safety, public relations, police operations, and patient safety shall
designate one or more employees to be responsible for reporting significant events to the Office of Regulatory Affairs and Compliance.

i. Designated employees shall serve as the point of contact for reports of significant events for their area and department.

ii. Initial reports of significant events or allegations will be provided to the designated employees.

b. **Executive Officers.** Executive officers are responsible for:

i. Informing their staff, students, contractors, etc. of the need to report incidents promptly and

ii. Ensuring that designated employees comply with this procedure for incidents reported to them.

c. **Individual Employees.** HSC employees may report significant events directly to the Office of Regulatory Affairs and Compliance.

II. **Prompt Reporting of Significant Events**

a. Employees are responsible for promptly reporting significant events to the Office of Regulatory Affairs and Compliance or to a Designated Employee for their area and department.

b. Reports received by Designated Employees should be promptly communicated to the Office of Regulatory Affairs and Compliance. Within 24 hours of *initial discovery* of a significant event, the Designated Employee should make a report to the Office of Regulatory Affairs and Compliance.

   c. Initial discovery means that the significant event has been brought to the attention of a Designated Employee.
Significant events should be reported regardless of whether an investigation has been completed.

d. It is important that the Office of Regulatory Affairs and Compliance is made aware of significant events to ensure that UT System is promptly notified, as required by UTS 178.

Reporting Methods

Reports may be submitted through one of the following methods:

1. Contacting the Office of Regulatory Affairs and Compliance at 210-567-2014;

2. Calling the Fraud, Abuse and Privacy Hotline at 1-877-507-7317.

Required Information

The report should include the following information:

1. The date of the significant event or allegations;

2. When and how it was reported to the HSC;

3. A description of the event or allegation;

4. The status or resolution of the event or allegation; and,

5. The name and information of a contact person having knowledge of the facts regarding the significant event.

Significant Event Follow-Up Reporting

The Office of Regulatory Affairs and Compliance will contact the employee or Designated Employee for updates on each significant event. The Office of Regulatory Affairs and Compliance shall:

1. Request a follow-up report within 7 days of the initial report; and, request follow-up reports on a monthly schedule, until follow-up reports are no longer necessary.
References

The University of Texas System, System wide Policy, **UTS 178**
Required Reporting of Significant Events