



Reporting Non-Compliance

Reporting Non-Compliance

- Duke University expects all employees to assist in maintaining a compliant environment
- The university requires all employees to help by
 - Assisting in correcting non-compliant practices
 - Advising others of non-compliant behavior and/or practices
 - Reporting serious fraudulent non-compliance to the proper office(s)
- This includes reporting instances of financial non-compliance in accordance with Federal regulations and Duke University policies and procedures.
- Duke University views non-compliance in two ways:
 - Non-fraudulent behavior
 - Fraudulent behavior



Reporting Non-Compliance

Addressing Non-Fraudulent Compliance Issues

- As non-fraudulent financial compliance questions arise, each employee has the responsibility to investigate and explore the right thing to do according to sponsor and University requirements.
- This means:
 - Understanding the correct rule/regulation
 - Advising others on these issues
 - Assisting others in correcting non-compliant practice
 - Reporting continued non-compliant practice to a supervisor or appropriate university office
- You will need to use your own discretion depending on:
 - The issue
 - Your role
 - Your relationship with members of your department
- **Doing nothing about a non-compliant situation is not acceptable**



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Addressing Non-Fraudulent Compliance Issues

- Resources available to you include:
 - Sponsor regulations
 - University policies and procedures
 - Training classes
 - **Duke University Medical Center Compliance Integrity Hotline: (800) 826-8109** (*Calls to Hotline can be anonymous*)
 - The network of informed individuals with whom you work, such as the PI, Departmental or Research Administrator, Business Manager, Management Center, Chair, or Dean





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Addressing Non-Fraudulent Compliance Issues

As an alternative, if a question remains unresolved or if you are uncomfortable using the above resources, the Office of Sponsored Programs (OSP) is available to assist you.



You may contact OSP at 684-5442; or



Send an e-mail to the OSP Associate Directors:

- Mary Johnson
- Heather Quadlin
- Sandy Hart





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Fraudulent Compliance Issues

- **Instances of possible fraud must be reported to the Duke University Compliance and Fraud Hotline (800-849-9793) regardless of the value involved. For more information, visit the [Compliance Web site](#).**
- Reports will be investigated and appropriate action will be taken.
- Calls will not be traced.
- Calls to Hotline can be anonymous.
- Callers can identify themselves if they need to give further information about a situation.
- If callers choose to identify themselves, their confidentiality will be protected to the extent permitted by law.



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Fraudulent Compliance Issues

If it is feasible or appropriate, you may also want to notify the Office of Sponsored Programs (OSP), Principal Investigator (PI), Department Administrator, Business Manager, Chair, and/or Dean.

Online Training





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Duke Policy on Reporting Fraud

- Duke has a Compliance Reporting and Non-Retaliation and Non-Retribution policy.
- The policy ensures that no one will be subject to any adverse action just because they report what they honestly believe is a compliance violation.
- However, if Duke determines that someone purposely made up, exaggerated, or otherwise distorted a report of wrongdoing - *whether to protect themselves or to hurt someone else* - that person will NOT be protected under the policy.



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Compliance Monitoring

- [Research Costing Compliance](#)
 - Monitors compliance by testing research transactions, integrates compliance monitoring with training, and provides remediation and assistance in corrective actions
- ☎ You may contact RCC at (919) 668-0275
- [Office of Internal Audits](#)
 - Perform audits of schools the scope and subject are based on risk self assessments consider identified compliance risks
 - Duke University Compliance Program provides oversight for compliance activities across the entire university