ICO Handling of Reported Concerns

Integrity and Compliance

A. Preliminary review and vetting

- Is the report related to VCU?
  - Y: Forward to VCU Health or redirect reporter externally
  - N: Apply conflict rules or escalation process outlined in ICO protocol

- Conflict identified or escalation required?
  - Y: Answer Qs and/or thank reporter for info and share with appropriate unit
  - N: Close Report

- All issues addressed and documentation received?
  - Y: Confirm accuracy and update dept/unit, issue type, involved parties
  - N: Pattern or practice of misconduct?
    - Y: Link related cases
    - N: Decide and designate case owner

- Additional info needed?
  - Y: Pose follow-up questions to the reporter
  - N: Appropriate manager/unit

B. Investigate allegations

- Update closeout info and status

- Closeout response:
  - Y: Substantiation
  - Y: Supporting Documentation
  - Y: Root Cause

* These process guidelines are applied as appropriate depending on the unique circumstances of each case.