

## **Guidelines for Responding to Reports Submitted through the Graduate Medical Education (GME) Hotline or Confidential Reporting Form**

- I. **Background:** The University of Illinois Chicago (“UIC” or “Sponsoring Institution” for ACGME purposes) and each of its ACGME-accredited programs (“programs”) endeavors to provide a learning and working environment in which residents/fellows have the opportunity to raise concerns and provide feedback without fear of intimidation or retaliation.
  - A. The Sponsoring Institution, in partnership with its ACGME accredited program(s), must have a process for
    1. Confidential reporting of concerns and feedback,
    2. Timely investigation of reported concerns;
    3. Addressing valid concerns and monitoring compliance with plans to address those concerns.
  - B. The Sponsoring Institution should also have a process to educate residents/fellows and faculty members regarding unprofessional behavior.
  - C. In compliance with these obligations, UIC maintains several mechanisms for confidential reporting by faculty and residents/fellows, including the GME Hotline and the GME Confidential Reporting Form found online and will follow these guidelines to investigate and address reported concerns, including concerns about unprofessional behavior.
- II. **Purpose:** This document outlines the process for responding to and addressing concerns and feedback received through the GME Hotline and the GME Confidential Reporting Form.
- III. **Confidentiality:** UIC strives to maintain the highest level of confidentiality for individuals reporting concerns through the hotline and/or GME Confidential Reporting Form. All reports will be handled with discretion, and reasonable steps will be taken to protect the identity of those making reports. See section VII regarding exceptions to that general rule.
- IV. **Report Intake**
  - A. Initial Intake & Assessment
    1. Reports received through the GME hotline and/or Confidential Reporting Form will be reviewed by a designated official(s) within the GME office with appropriate experience in handling sensitive information.
    2. The designated official(s) will assess the nature of the reported concern(s) to determine the appropriate course of action.
  - B. Review of Report Based on Type of Reporting

1. **Anonymous Reporter:** The GME office will review the report to determine if further investigation or reporting to other appropriate officials is warranted. If further reporting is necessary, the GME office will take steps to gather information in a manner that protects the anonymity of the reporter to the extent possible, such as reviewing existing documentation, reviewing reports with Risk Management, or conducting Special Reviews of whole programs rather than just individual faculty.
2. **Identified Reporter:** The GME office will first contact the individual who reported the concern to discuss the report further and gather additional information. The individual will be informed of the following before GME moves forward with the process described below:
  - a. The process for reviewing and assessing reports;
  - b. The options available to the individual for moving this matter forward;
  - c. Possible outcomes and resolutions and how remaining anonymous may limit those outcomes and resolutions;
  - d. Resources that are available to the individual; and
  - e. GME's obligations to report the matter to others (see section \_\_\_\_ below).

## V. Report Review Process

A. General Guidelines: Recognizing that reports may raise concerns about the general learning/working environment, the program itself, faculty members, residents or fellows, or general patient safety, the following general guidelines shall apply.

1. Reports will be addressed in collaboration between the GME office and any relevant program. The GMEC may also be involved in the process.
  - a. The GME may have to refer a matter to another office or department charged with investigating certain types of allegations. In that case, the GME will consider the results of that investigation in determining next steps.

VI. If the report raises issues falling under the University Nondiscrimination Statement or the University Sexual Misconduct Policy. Those cases will be investigated exclusively by OAE.

1. The GME may determine that other institutional officials will need to be notified of the report to properly address it.
  - a. If the report raises serious concerns (retaliation, unsafe conditions, etc.) the GME may be obligated to notify others of the

report or concerns raised in the report. This will be done while taking into consideration any request by a reporter that their identity remain anonymous.

- b. If the report raises issues falling under the University Nondiscrimination Statement or the University Sexual Misconduct Policy. Those cases will be investigated exclusively by the Office for Access and Equity.
  - c. If the report includes patient safety concerns, the GME office will notify the applicable clinical site's Risk Management Department and/or GME leadership, consistent with established institutional protocols and practices.
  - d. For reports about the health or safety of an individual or group, the GME office may report the concerns to the following (non-exhaustive), depending on the nature and severity of the concern:
    - i. Any parties identified to be at risk;
    - ii. Risk Management;
    - iii. The appropriate Rapid Threat Assessment Team;
    - iv. Campus police or local law enforcement.
  - e. Professionalism concerns may also require additional internal or external reporting and review consistent with established institutional protocols.
2. In response to Reports, the GME office may do any or all of the following:
- a. Advocate for changes to improve the learning/working environment;
  - b. Collaborate with the relevant program leadership, clinical site, and/or individual faculty member to identify concerns and possible responsive actions;
  - c. Provide education, training, or educational resources;
  - d. Identify other available resources.
- B. Concern Specific Guidelines: In addition to the above general guidelines, the GME will take the following steps based on the reported concern.
1. **Concerns about the Program or about a faculty member**:
    - a. Upon receipt of a report expressing concerns about a program, the GME office will notify the appropriate Program Director and/or the Department Head/Division Chief about the concerns expressed in the report and instruct them to conduct an appropriate review. If

the Program Director is the subject of the reported concern, GME may determine that notification is not appropriate.

- i. The GME office may require the program to provide a follow-up report by a specified deadline.
- b. Prior to or after notifying the program administration listed above, the GME office may decide to conduct its own internal inquiry to
  - i. Gather information to better understand the concern(s);
  - ii. Assess the potential impact on the program; and
  - iii. Determine if the reported concerns relate to compliance with ACGME program and institutional requirements.
- c. Failure of the program to adequately address the concerns will be reported to the GMEC.

## **2. Concerns about Residents/Fellows**

- a. Upon receipt of a report expressing concerns about a Resident/Fellow, the GME office will notify the Program Director to whom the Resident/Fellow reports and instruct them to conduct an appropriate review.
  - i. The GME office may require the program to provide a follow-up report by a specified deadline.
- b. Prior to or after notifying the program administration listed above, the GME office may decide to conduct its own internal inquiry to
  - i. Gather information to better understand the concern(s);
  - ii. Assess the potential impact on the program; and
  - iii. Determine if the reported concerns relate to compliance with ACGME program and institutional requirements.
- c. Failure of the program to adequately address the concerns will be reported to the GMEC.

VII. **Mandated Reporting:** While the GME Hotline serves as a safe space for anonymous reporting, the GME office or officials within the GME Office may be considered mandated reporters for certain matters. The GME Office will adhere to all legal and ethical obligations concerning mandated reporting. Pursuant to relevant federal and state laws, rules and regulations, as well as applicable University policies and procedures, the GME office may be obligated to report certain types of reported concerns to designated authorities, even if received anonymously. The following are examples of mandated reporting scenarios:

- A. Unlawful Sexual harassment, Sex-based discrimination, and retaliation: If a report suggests potential violations of Title IX of the Education Amendments of 1972, 20 USC §1681, et.seq. (“Title IX”) and its implementing regulations, or

other anti-discrimination laws, regulations, or policies (e.g., UIC Sexual Misconduct Policy), the GME office may be obligated to report the concern to the designated Title IX coordinator or other appropriate official.

- B. Child abuse or neglect: If a report leads to a reasonable belief that a minor child, known to the reporter in their professional or official University capacity may be an abused or neglected child, the GME office is legally mandated to report the concern to the Department of Children and Family Services, to the UIC Police, and to others as required by law and applicable policy.
- C. Threats of violence or self-harm: If a report expresses or references credible threats of violence to oneself or others, the GME office may be required to involve the appropriate authorities, such as campus police or law enforcement, and campus or other threat assessment team, to address safety concerns.

#### **VIII. Documentation and Follow-Up**

- A. GME Office: All reports received through the GME Hotline or GME Confidential Reporting Form will be documented and maintained by the GME office. The documentation maintained by GME will include the date of the report, a summary of the reported concerns, and the actions taken by GME to address the report.
- B. Residency/Fellowship Program: Any follow up actions taken by the Program as a result of any reports should be documented and maintained by that Program. The GME office may request access to that documentation at any time.
- C. Annual Reports: At a minimum, annual reports summarizing the types and nature of reports received and the actions taken will be presented to the GMEC for review. This summary report will be provided to the GMEC in a de-identified manner and solely for the purpose of oversight.

- IX. **Retaliation**: Retaliation against any individual who reports a concern in good faith through the GME Hotline or GME Confidential Reporting Form is prohibited and may lead to disciplinary or other action. Any individual who experiences retaliation should immediately report it to the GME office or other designated official.