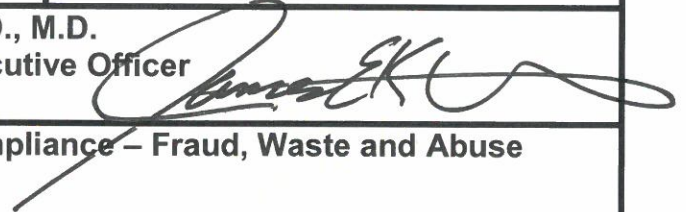


Effective Date: 11/01/2016

Retired:

Revised:

Approved by: James E.K. Hildreth, Ph.D., M.D.  
President and Chief Executive Officer



Subject: Office of General Counsel/Compliance – Fraud, Waste and Abuse  
Policy and Procedures

**PURPOSE:**

Meharry Medical College is a nonprofit organization, which is partially funded by public, charitable contributions and by taxpayer-funded grants received from the federal government, channeled through the Tennessee Department of Substance Abuse Services. It is the policy and intent of Meharry Medical College that all funds received are to be handled in ethical ways, only for the purposes described in the organization's charter, in its mission statement, and as directed by its Board of Trustees. Further, those policies and organization procedures support and restrict the use of all funds received from donations and government entities to use as intended by the granting entity.

**PROCEDURE:**

It is the firm policy of Meharry Medical College that any reported instance or suspicion of fraud, waste or abuse of Meharry Medical College resources of any kind will be fully investigated by organization representatives. Any client, staff member, donor, or other party who knows of or suspects such fraud, waste, or abuse is encouraged to report those instances to the Office of General Counsel's Department of Compliance, in person, via email at [compliance@mmc.edu](mailto:compliance@mmc.edu) or through the Compliance Hotline number 888.695.1534. All calls are confidential.

If the reporting person believes that appropriate investigation and response has not been effected by the organization after a reasonable period of time, after the report is made, he or she is encouraged to report their suspicions or knowledge to the Tennessee Comptroller of the Treasury via its hotline as described below.

Any persons who may be accused of wrongdoing within the organization shall be given full opportunity to be presented with the accusations, and to respond fully, including presentation of evidence, information, or facts that may contradict any allegations against them.

Since October 1983, the Comptroller of the Treasury has provided a toll-free hotline

Effective Date:

**Subject: Fraud, Waste and Abuse Policy and Procedures**

for reporting fraud, waste and abuse of government funds and property. Periodicals throughout Tennessee publish information to alert citizens to the hotline and to encourage them to report wasteful, inefficient or fraudulent activities. In addition, all state agencies, as well as those agencies receiving community grant funds, are required to call attention to the hotline by displaying in a prominent place signs with the following language:

**If you observe an agency director or employee engaging in any activity, which you consider to be illegal, improper or wasteful, please call the State Comptroller's Toll-Free Hotline at 1-800-232-5454**

In January 2013, the Comptroller of the Treasury established a website for reporting fraud waste and abuse. Please click below to be directed to the online reporting website.

#### **Comptroller's Fraud Hotline Online Form**

[https://portal.comptroller.tn.gov/ layouts/FormServer.aspx?XsnLocation=%2fFormServerTemplates%2fHotline.xsn&ClientInstalled=false&Source=https%3a%2f%2fportal.comptroller.tn.gov%2fFormServerTemplates%2fForms%2fAll%2520Forms.aspx&DefaultItemOpen=1](https://portal.comptroller.tn.gov/layouts/FormServer.aspx?XsnLocation=%2fFormServerTemplates%2fHotline.xsn&ClientInstalled=false&Source=https%3a%2f%2fportal.comptroller.tn.gov%2fFormServerTemplates%2fForms%2fAll%2520Forms.aspx&DefaultItemOpen=1)

Calls and online submissions to the hotline should concern allegations of fraud, waste, and abuse. Substantive notifications may concern a wide range of entities, including municipalities, counties and state agencies and departments. In the event of no substantive notifications, such as requests for assistance or information, the reporting party may be referred to the appropriate agency or department for assistance.

**EXHIBITS: NONE**