

## **Medical Compliance**

**SUBJECT: Non-Retaliation/Non-Retribution Policy**

**PURPOSE: The Health and Medical Division and CIHA have implemented a compliance program that promotes the highest standard of ethical and legal conduct. Positive employee relations and morale can be best achieved and maintained in a working environment that promotes ongoing open communication between supervisors and their employees. The purpose of this policy is to encourage employees to communicate problems, concerns and opinions without fear of retaliation or retribution.**

**STAFF GOVERNED BY THIS POLICY: Health and Medical Division, Cherokee Indian Hospital, Tsali Care Center**

**EFFECTIVE DATE: August 23, 2005**

**DATE REVIEWED OR REVISED:**

**DISTRIBUTION: HMD, CIHA, TCC**

### **POLICY:**

All employees are responsible for promptly reporting actual or potential wrongdoing, including an actual or potential violation of law, regulation, policy or procedure. The Office of Compliance will maintain an "open door policy" to allow individuals to report problems and concerns. The Offices of Compliance will act upon the concern promptly and in the appropriate manner. The Compliance Hotline (1-800-455-9014) is designed to permit individuals to call, anonymously or in confidence, to report problems and concerns or to seek clarification of compliance related issues. Employees who report concerns in good faith will not be subjected to retaliation, retribution, or harassment. No employee is permitted to engage in retaliation, retribution, or any form of harassment against another employee for reporting compliance-related concerns. Any retribution, retaliation, or harassment will be met with disciplinary action. Employees cannot exempt themselves from the consequences of wrongdoing by self-reporting, although self-reporting may be taken into account in determining the appropriate course of action.

### **Procedure:**

1. Knowledge of actual or potential wrongdoing, misconduct, or violations of the compliance plan must be immediately reported to management, the compliance officer, legal division or the compliance hotline.

2. All managers must maintain an open-door policy and take aggressive measures to assure their staff that the system truly encourages the reporting of problems and that there will be non-retaliation, retribution or harassment for doing so.
3. A copy of this policy must be provided to all HMD employees.
4. A copy of this policy must be posted in every program within Health and Medical.
5. If employees have concerns they should follow their chain of command.
6. If an employee feels uncomfortable with the above, the employee should report their concerns directly to the compliance officer, legal division or the compliance hotline.
7. All concerns will be investigated in a timely fashion.

Confidentiality regarding employee concerns and problems will be maintained at all times insofar as legal and practical, informing only those personnel who have a need to know.