

## **Community Health Services Whistle Blower Policy**

### **I. Policy as Pertains to Employees:**

If any employee reasonably believes that some policy, practice, or activity of Community Health Services (CHS) is in violation of law, a written and signed complaint may be filed by that employee with the Executive Director. The Executive Director will acknowledge receipt of the written report by signing a copy of the report. If the complaint is about the Executive Director, the employee will submit the written and signed report to the Board President, who will acknowledge receipt with his/her signature. The employee will be given a copy of the signed and dated complaint from whoever has received the report.

It is the intent of CHS to adhere to all laws and regulations that apply to the organization, and the underlying purpose of this Policy is to support the organization's goal of legal compliance. The support of all employees is necessary to achieving compliance with various laws and regulations. An employee is protected from retaliation only if the employee brings the alleged unlawful activity, policy or practice to the attention of the Executive Director and provides the Executive Director with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to employees that comply with this requirement. The Executive Director is required to report progress on the investigation to the employee within five (5) business days. The same time frame applies to a complaint registered with the Board President.

CHS will not retaliate against an employee who, in good faith, has made a protest or raised a complaint against some practice of CHS, or of another individual or entity with whom CHS had a business relationship, on the basis of a reasonable belief that the practice is in violation of law or a clear mandate of public policy. CHS will not retaliate against an employee who discloses or threatens to disclose to a supervisor or a public body any activity, policy, or practice of CHS that the employee reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate or public policy concerning health, safety, welfare, or protection of the environment.

This policy is intended to encourage Board members to report suspected or actual occurrences of illegal, unethical or inappropriate events (behaviors or practices) without retribution.

**II. Policy as Pertains to Board Members**

1. The Whistleblower should promptly report the suspected or actual event to the Board President.
2. If the Whistleblower would be uncomfortable or otherwise reluctant to report to the Board President, then the Whistleblower could report the event to the next highest Board member or a member of the Executive Committee.
3. The Whistleblower can report the event with his/her identity or anonymously.
4. The Whistleblower shall receive no retaliation or retribution for a report that was provided in good faith – that was not done primarily with malice to damage another or the organization.
5. A Whistleblower who makes a report that is not done in good faith is subject to discipline, including termination from the Board or other legal means to protect the reputation of the organization and members of its Board and staff.
6. Anyone who retaliates against the Whistleblower (who reported an event in good faith) will be subject to discipline, including termination from the Board.
7. Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.
8. Supervisors, managers and/or Board members who receive the reports must promptly act to investigate and/or resolve the issue.
9. The Whistleblower shall receive a report within five (5) business days of the initial report, regarding the investigation, disposition or resolution of the issue.
10. If the investigation of a report that was done in good faith and investigated by internal personnel is not to the Whistleblower’s satisfaction, then he/she has the right to report the event to the appropriate legal or investigative agency.
11. The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organization are subject to subpoena.

Adopted: \_\_\_\_\_

Reviewed and/or Amended: \_\_\_\_\_

**III. Acknowledgement of Receipt of Policy**

My signature below indicates my receipt and understanding of this Policy. I also verify that I have been provided with an opportunity to ask questions about the Policy.

\_\_\_\_\_  
Employee or Board Member Signature

\_\_\_\_\_  
Executive Director or Board President

Date Signed: \_\_\_\_\_

Date Signed: \_\_\_\_\_