

**VILLAGECARE
CORPORATE COMPLIANCE
POLICY AND PROCEDURE MANUAL**

SUBJECT: WHISTLEBLOWER PROTECTIONS		POLICY CODE: COMP-602
LAST POLICY REVISION EFFECTIVE : JANUARY 1, 2012	ORIGINAL EFFECTIVE DATE: JANUARY 27, 1999	# OF PAGES: 2
ADMINISTRATIVE APPROVALS:		
DATE: <u>2/1/12</u> BY: <u>Emma Delia H</u>		

PURPOSE:

VillageCare and its affiliates and their respective directors, officers, employees, contractors and volunteers (collectively, “representatives”) are required to comply with the organization’s code of conduct, policies and procedures and the laws and regulations that apply to the organization in the conduct of their duties and responsibilities. This Whistleblower Policy is intended to protect representatives against retaliation for reporting suspected actual or potential violations of law, regulations, policy, procedure, or the Code of Conduct (“violations”); to comply with laws and regulations requiring such protections; and to support the organization’s goal of ensuring compliance with the its code of conduct, policies and procedures and applicable laws and regulations by encouraging and enabling representatives to raise serious concerns internally in order to correct and resolve any violations.

POLICY:

Non-Retaliation. There will be no harassment, adverse employment consequence, or other form of retaliation against any representative or other person who makes a good-faith report of a violation or suspected violation of law, regulations, policy, procedure or the Code of Conduct. This policy applies to internal reporting and external reporting to outside agencies with jurisdiction over the matter reported. A representative who retaliates against someone who has reported a violation or suspected violation of law, regulation, policy, procedure or the Code of Conduct in good faith is subject to discipline up to and including termination. This protection does not apply to anyone who deliberately makes a false accusation of a violation. Any representative alleging a violation in bad faith will be subject to disciplinary action, up to and including termination.

Open Door Policy. VillageCare has an open door policy for internal reporting of violations or suspected violations. (*refer to policy COMP-201 Communications Protocols*). Matters which should be reported under this policy include but are not limited to actual or suspected:

- Fraud, waste and abuse

- Theft or misuse of assets
- Abuse, harassment of patients, residents or clients
- Harassment of or improper retaliation against a representative
- Discrimination
- Billing or coding irregularities
- Kick-backs
- Breaches of confidential information
- Environmental or safety issues
- Undisclosed conflicts of interest or private inurement

Investigations of Reports of Violations. The Corporate Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of this policy and procedure and, as appropriate, will advise the President and Chief Executive Officer and the Audit Committee of the Board of Directors of such matters.

Confidentiality. Reports may be submitted on a confidential basis or anonymously. Reports of violations or suspected violations of this policy and procedure will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

RESPONSIBILITY:

The Corporate Compliance Officer is responsible for monitoring compliance with this Policy.