



	<p>Current Status: <i>Active</i> PolicyStat ID: 7857943</p> <p>Implementation: 03/2020</p> <p>Effective: 03/2020</p> <p>Last Reviewed: 03/2020</p> <p>Last Revised: 03/2020</p> <p>Next Review: 03/2025</p> <p>Owner: <i>David Lane: Chief Compliance Officer</i></p> <p>Policy Area: <i>Compliance</i></p> <p>Departments:</p> <p>Applicability: <i>Providence Health & Services Systemwide</i></p>
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PSJH-RIS-733 Non-Retaliation

Executive Sponsor:	Sheryl Vacca, SVP, Chief Risk Officer
Policy Owner:	David Lane, VP, Chief Compliance Officer
Contact Person:	Karen J. Coleman, Director, Compliance Services

Scope:
 This policy applies to Providence St. Joseph Health and its Affiliates (collectively known as "PSJH")¹ and their caregivers (employees); employees of affiliated organizations. This is a management level policy, reviewed and recommended by the Policy Advisory Committee (PAC) to consider for approval by senior leadership which includes vetting by Operational Leadership Council (OLC) and Executive Council (EC) with final approval by the President, Chief Executive Officer or appropriate delegate.

Purpose:
 To establish a policy that protects workforce members from retaliation or harassment for having raised concerns about actual or potential wrongdoing or misconduct.

- Definitions:**
1. *Retaliation:* Any adverse action taken against a workforce member because the workforce member has, in good faith, reported wrongdoing or has, in good faith, cooperated in/with an investigation. Adverse actions may include actions such as scheduling changes, physical relocation, adverse evaluations, paid administrative leave, and termination. Retaliation is prohibited by law.
 2. *Workforce member* is defined as all employees, volunteers, trainees, independent contractors and other persons under direct control of a PSJH entity, whether they are paid by PSJH.
 3. *Wrongdoing* may include, but is not limited to:
 - Illegal or fraudulent activity;
 - Financial misstatements, or accounting or auditing irregularities;
 - Conflicts of interests, or dishonest or unethical conduct;
 - Violations of the Code of Conduct;
 - Violations of applicable laws, rules, regulations, and/or policies.
 4. *Integrity and Compliance Program* is fully described in the Board approved PSJH Integrity and Compliance Program Description and includes the Codes of Conduct and a number of integrity and compliance policies for our family of organizations.

Policy:

Workforce members have a responsibility to promptly report concerns about actual or potential wrongdoing –including violations of PSJH's Integrity and Compliance Program – through proper channels and are not permitted to overlook such actual or potential wrong-doing.

PSJH prohibits retaliation against any workforce member for making a good-faith report of their concerns about actual or potential wrong-doing – including violations of the PSJH Integrity and Compliance Program. Retaliation is also prohibited against any workforce member who in good faith assists in the investigation of any reported concern. Any manager, supervisor, employee, or other workforce member who engages in retaliation or harassment is subject to discipline or other appropriate corrective action.

Requirements:

1. The responsibility to report and the commitment to an environment free from retaliation are communicated to workforce members through regular integrity and compliance education, their managers, and through the PSJH Integrity and Compliance Program.
2. Workforce members cannot exempt themselves from the consequences of wrong-doing or inadequate performance by reporting such wrong-doing or inadequate performance. However, the consequences of wrong-doing or inadequate performance may not, in any case, be more severe because a workforce member reported it on his or her own initiative.
3. Incidents of retaliation or suspected retaliation may be submitted by workforce member or may be submitted anonymously. Good faith reports of retaliation or suspected retaliation will be kept confidential to the extent possible, consistent with the need to conduct an appropriate investigation.
4. Any concerns regarding potential retaliation should be reported to the Regional Integrity and Compliance Office, System Integrity, or Human Resources for investigation and resolution.

References:

Guidance from the Office of the Inspector General (OIG): At a minimum, comprehensive compliance programs should include the following: ...The adoption of procedures to protect the anonymity of complainants and to protect whistleblowers from retaliation. [63 FR 35, p. 8989](#)

[Deficit Reduction Act: Public Law 109-71](#)

[False Claims Act: 31 U.S.C. §§ 3729-3733](#)

[PSJH Codes of Conduct](#)

[Integrity and Compliance Program Description](#)

[PROV-ICP-711, Fraud and Abuse Prevention and Detection](#)

Attachments:

No Attachments.

Applicability:

¹For purposes of this policy, "Affiliates" is defined as any entity that is wholly owned or controlled by Providence St. Joseph Health (PSJH), Providence Health & Services, St. Joseph Health System, Western HealthConnect, Covenant Health Network, Inc., or is jointly owned or controlled by PSJH or its Affiliates and bears the Providence, Swedish Health Services, Swedish Edmonds, St. Joseph Health, Covenant Health Network, Covenant Health, Kadlec Regional Medical Center, or PacMed Clinics name (includes Medical Groups, Hospice, Home Health, etc.).

Attachments

No Attachments

Approval Signatures

Approver	Date
Cynthia Johnston: Compliance Spec PSJH	03/2020
Cynthia Johnston: Compliance Spec PSJH	03/2020
Cynthia Johnston: Compliance Spec PSJH	03/2020

Applicability

AK - Providence Alaska MC, AK - Providence Kodiak Island MC, AK - Providence Seward MC, AK - Providence Valdez MC, CA - Mission Hospital Laguna Beach, CA - Mission Hospital Mission Viejo, CA - Petaluma Valley Hospital, CA - Providence Cedars-Sinai Tarzana MC, CA - Providence Holy Cross MC, CA - Providence LCM MC San Pedro, CA - Providence LCM MC Torrance, CA - Providence Saint John's Health Center, CA - Providence Saint Joseph MC, Burbank, CA - Queen of the Valley Medical Center, CA - Redwood Memorial Hospital, CA - Santa Rosa Memorial Hospital, CA - St. Joseph Hospital - Eureka, CA - St. Joseph Hospital Orange County, CA - St. Jude Medical Center, CA - St. Mary Medical Center Apple Valley, MT - Providence St. Joseph MC, Polson, MT - St. Patrick Hospital, OR - Clinical Support Staff (CSS), OR - Connections, OR - Credena Health (CH), OR - Home Health (HH), OR - Home Medical Equipment (HME), OR - Home Services, OR - Home Services Pharmacy (HSRx), OR - Hospice (HO), OR - Providence Ctr for Medically Fragile Children, OR - Providence Hood River Memorial Hospital, OR - Providence Medford MC, OR - Providence Medical Group, OR - Providence Medical Group, OR - Providence Milwaukie Hospital, OR - Providence Newberg MC, OR - Providence Portland MC, OR - Providence Seaside Hospital, OR - Providence St. Vincent MC, OR - Providence Willamette Falls MC, Providence Home and Community Care, Providence St. Joseph Health, Providence and Kadlec Express Care, Swedish Medical Center - Ballard Campus, Swedish Medical Center - Cherry Hill Campus, Swedish Medical Center - Edmonds Campus, Swedish Medical Center - First Hill Campus, Swedish Medical Center - Issaquah Campus, WA - Kadlec Regional Medical Center, WA - NWR Providence Medical Group, WA - Providence Centralia Hospital, WA - Providence Holy Family Hospital, WA - Providence Mount Carmel Hospital, WA - Providence Physician Services, WA - Providence Regional MC Everett, WA - Providence Sacred Heart MC, WA - Providence St. Joseph's Hospital, WA - Providence St. Mary MC, WA - Providence St. Peter Hospital, WA - Providence Surgery Center, Pacific Campus, WA - SWR Providence Medical Group