

KEY WORDS:

1. Reporting
2. Non-Intimidation
3. Non-Retaliation
4. Harassment
5. Violation
6. Discrimination

A. GENERAL POLICY STATEMENT

The purpose of this policy is to establish Leatherstocking Collaborative Health Partners' (LCHP) standard for non-intimidation and non-retaliation against those who, in good faith, raise a concern or report an ethical or compliance issue.

B. SCOPE

This Policy applies to LCHP and its assigns, acting as the Lead Entity, and all LCHP Partners.

C. ACCOUNTABILITY

This policy will be administered by the LCHP Compliance Officer.

D. POLICY ELEMENTS

1. Intimidation and/or retaliation against any Partner Organization, their directors, officers, staff, or contractors or LCHP staff who seek advice, raise a concern or report an ethical or compliance issue in good faith, will not be tolerated. Good faith reporting of compliance concerns and violations is protected by the Code of Conduct.
2. "Intimidation" for the purpose of this policy includes, but is not limited to, verbal or physical threats, or unprofessional or belittling comments. "Retaliation" includes, but is not limited to, termination, demotion, discrimination, other adverse employment action, bullying. "Retaliation" does not include normal supervision, performance management, or standards of accountability.
3. Partner Organizations or individuals who deliberately make a false accusation with the purpose of harming or retaliating against another person or Partner Organization will be subject to disciplinary action up to, and including, termination of employment, or termination of participation in or business relationships with LCHP.

4. Individuals who detect or suspect wrongdoing such as incorrect reporting, improper billing or coding, payment for referrals, or misuse of restricted funds, are required to bring it to the attention of the LCHP Compliance Officer. The procedure for doing so is by telephone to the Compliance Hotline at 607-547-3017. All individuals may report anonymously.
5. Individuals may also report to appropriate officials following the procedure described in NY Labor Law §§740 and 741.

E. COMMUNICATION

This policy will be posted on the LCHP website.

F. DISTRIBUTION

This policy will be distributed to all LCHP partners.

G. ENFORCEMENT

The LCHP Compliance Committee is responsible for compliance to this policy.

H. REVISIONS

The LCHP Compliance Officer is responsible for revising this policy for approval by the LCHP Compliance Committee.