

SIU School of Medicine SIU HealthCare POLICY

NONRETALIATION AND NONRETRIBUTION

Policy

The SIU Medicine's, collectively the School of Medicine (SOM) and SIU Healthcare (SIUHC), mission is to assist the citizens of central and southern Illinois in meeting their health care needs through education, research, patient care and service to the community. SIU is committed to accomplishing this mission by upholding the highest standards of lawful and ethical behavior at all levels of the organization. To accomplish this objective, all members of the SIU community are encouraged and expected to communicate any known or suspected compliance activities or concerns to their supervisor and/or other appropriate SIU official for review. The term SIU community member refers individually and collectively to faculty, staff, students, residents, contractors, or agents and includes both paid employees and volunteers.

The SOM commits to its community members that they may make a disclosure or file a report of a potential compliance issue without fear of retaliation, retribution or harassment. No member of the SIU community is permitted to engage in retaliation, retribution or any form of harassment against another member for reporting compliance-related concerns. Any retribution, retaliation or harassment will be met with strict disciplinary action. No member of the SIU community will knowingly allow any retaliation, retribution or harassment to occur. Faculty, administrators and managers at all levels of the organization must take positive measures to assure all SIU members that SIU leadership genuinely encourages the reporting of issues as a service to the SIU, and that there will be no retaliation, retribution or harassment for filing reports.

I. Background:

The SOM has implemented a compliance program that promotes the highest standard of ethical and legal conduct. Standards and procedures for faculty, staff, students, residents, and others have been implemented to guide this effort. As a part of that program is the need for members of the SOM community to have a mechanism for reporting possible violations or concerns of noncompliant behavior without fear of retaliation, retribution or harassment.

II. Policy:

1. All SOM members are responsible for promptly reporting actual or potential wrongdoing, including an actual or potential violation of law, regulation, policy or procedure.
2. The Office of Compliance and Ethics will maintain an "open door policy" to allow individuals to report problems and concerns. In addition, members may also report their concerns to their supervisor, department or unit head, SOM legal counsel, or other appropriate offices or persons. The Office of Compliance and Ethics will be made aware of all reports filed.
3. The Office of Compliance and Ethics will act upon the concern promptly and in an appropriate and fair manner.

4. The Compliance Help and Reporting Hotline (217-545-7479) is designed to allow individuals to call anonymously or in confidence, to report issues and concerns or to seek clarification of compliance-related issues.
5. Members may also file a written compliance incident report found at the SOM Office of Compliance and Ethics intranet web site.
6. Members who file reports in good faith will not be subjected to retaliation, retribution or harassment.
7. No member of the SOM community is permitted to engage in retaliation, retribution or any form of harassment against another member for reporting compliance-related concerns. Any retribution, retaliation or harassment will be met with disciplinary action.

III: Procedures:

1. Knowledge of actual or potential wrongdoing, misconduct, or violations of the compliance program or plan must be reported immediately to management, the Office of Compliance and Ethics or the Compliance Hotline.
2. Faculty, administrators and managers at all levels of the organization must maintain an open-door policy and take positive measures to assure their staff that the system truly encourages the reporting of issues, and that there will be no retaliation, retribution or harassment for doing so.
3. All members of the SOM will be trained on this policy in new employee orientation and periodically thereafter to raise awareness and to remind members of the policy requirements.
4. If members have concerns they should contact one of the following:
 - Immediate supervisor
 - Department/Unit manager
 - Department/Unit head or director
5. If a member feels uncomfortable with the individuals listed above, the member should report concerns directly to the Office of Compliance and Ethics, the Compliance Help and Reporting Hotline, SOM Legal Counsel or other appropriate department or unit.
6. All concerns will be investigated within thirty (30) days.
7. Confidentiality regarding member concerns and problems will be maintained at all times insofar as legal and practical, informing only those personnel who have a need to know.

Adopted: January 20, 1999	Contact: Compliance Officer
Revisions: Approved by OCP: 1/11/2017 Approved by Quality and Safety: 2/21/2017	References: Federal False Claims Act, Whistleblower Protection (31 U.S.C Sections 3729-3733) Illinois Whistleblower Act (740 ILCS 174) State of Illinois False Claims Act (740 ILCS 175)