

Non-Retaliation Engage Policy

Effective: 4/5/1993

Reviewed:

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Authoring Origin: SVP-Human Resources, Rod Hochman, MD - President/CEO

Origin Reference: INHS-1419

Scope: This policy applies to Providence Health and Services and its Affiliates¹ and their employees, volunteers and others who are in the direct control of Providence (collectively referred to as workforce members) with access to Providence information and information systems. This is a governance level policy approved by the Board of Directors and signed by the President/CEO.

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 Providence entity, whether or not they are paid by Providence.
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 Providence Integrity and Compliance Program Description and includes the Providence and Swedish Codes of Conduct and a variety of Providence and Swedish integrity and compliance policies.

¹ For purposes of this policy, "Affiliates" is defined as any entity that is wholly owned or controlled by Providence Health & Services or Western HealthConnect (for example, Swedish Health Services, Swedish Edmonds, Kadlec Regional Medical Center, PacMed Clinics and Inland Northwest Health Services).

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

Providence prohibits retaliation against any workforce member for making a good- faith report of their concerns about actual or potential wrong-doing – including violations of Providence’s 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 of 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 Providence’s 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

[Code of Conduct](#)

[INHS-1711 Fraud and Abuse Prevention and Detection](#)