




National University of Health Sciences General Policies

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Date Adopted: 1/1/11	Date(s) Revised:			
 _____ President		<u>1-1-11</u>		
	Date			

POLICY STATEMENT

It is the policy of National University of Health Sciences (NUHS) that all employees shall be free to report, without fear of retaliation, activity occurring in University operations that the reporting person believes in good faith to be illegal, dishonest, unethical, fraudulent, or not in compliance with University policy. Reported allegations will be treated confidentially to the greatest extent possible, and will be promptly investigated. The University provides various mechanisms to assist and encourage employees to come forward in good faith with reports or concerns about suspected compliance issues.

PURPOSE

The purpose of this policy is to allow NUHS employees to report concerns about University operations confidentially without risk of retaliation. The policy and its procedures are intended to ensure that all University operations are conducted ethically and with integrity. It is the intent of NUHS to adhere to all laws and regulations that apply to the organization and the underlying purpose of this policy is to support the organization's goal of legal compliance. The support of all employees is necessary to achieving compliance with various laws and regulations.

PROCEDURE

An employee is encouraged to make such a report to his/her immediate supervisor. If the employee feels unable to do so or if there is any reason why this may not be appropriate, the employee should raise the issue with Human Resources or the Vice President for Administrative Services. A written statement is required providing the name of suspected employee(s), description of the alleged violation, witnesses, and any evidence available regarding the alleged violation. All University employees have a duty to cooperate with investigations conducted under this policy. If the reporting person desires anonymity, the report should be in writing and delivered via regular mail or campus mail.

Any person may report allegations of suspected improper conduct. Reports should focus on facts, and avoid speculations and drawing conclusions. Including as much specific information as possible will facilitate the evaluation of the nature, extent and urgency of preliminary investigative procedures.

Again, an employee may make an anonymous report, with the understanding that any investigation may be hampered due to the inability to identify the employee in order to obtain a full and complete account of relevant and necessary facts from the employee or to ask additional questions or seek clarification as any investigation proceeds.

The Vice President for Administrative Services shall coordinate the investigation and will enlist the efforts of the appropriate University personnel to conduct the investigation or may solicit investigative services outside of the University. In addition, the Chief Compliance Officer shall:

1. Assure that all appropriate reporting occurs to the Office of the President, funding and regulatory agencies, Whistleblowers, and others, as necessary;
2. Assure that appropriate resources and expertise are allocated in order to effect a timely, comprehensive and objective investigation;
3. Ensure that there are no conflicts of interest on the part of any party involved in specific investigative units;
4. Monitor the progress of the investigation; and
5. Coordinate and facilitate as an advisor in determining the corrective and remedial action to be taken.

If the investigation establishes that a violation of law or University policy occurred, the Vice President for Administrative Services will determine appropriate action based upon law and College policy.

No Retaliation

An employee who in good faith reports a suspected violation of law or University policy shall not suffer harassment, retaliation or adverse employment consequence from other employees or the College. An employee who retaliates against someone who has reported a suspected violation in good faith is subject to discipline up to and including termination of employment. Any employee who believes that he/she has been retaliated against after making a good faith report may report this alleged retaliation to Human Resources or the Vice President for Administrative Services.

Confidentiality

Whistleblowers should be cautioned that their identity may become known for reasons beyond the control of the investigators or University administrators. Whistleblowers should be prepared to be interviewed by the investigator. In addition, employees submitting a report should be aware that their public testimony might be needed to prove the case against the suspected employee.

Although an employee's report may possess merit, comments made to others regarding another employee could constitute defamation, invasion of privacy or other grounds for civil liability. Employees should not discuss allegations outside of the reporting and investigation process. This is especially the case should the investigation prove that the suspected employee's actions were lawful or within College policy. If there is a self-disclosure, the University is no longer obligated to maintain confidentiality.

False Reporting

An employee shall not intentionally misuse the Whistleblower Policy. Intentional misuse includes, but is not limited to, frivolous claims, attempts to treat a personal grievance or personnel dispute as an allegation of wrongdoing, lack of good faith in invoking the policy or any known false, malicious or misleading statements made at any time under the procedures of the policy. After appropriate review, the employee is subject to discipline up to and including termination.