

<b>Title:</b> <i>Whistleblower Policy</i>			
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Approved:	<i>Will Ferniany</i> 08/31/09 Will Ferniany, PhD CEO, UAB Health System	Approved:	N/A Date
CAMH Ref#	NA		
<b>Associated Diagnosis/-</b>		*Contract Approval Process(CR)	
<b>Cross-References (CR):</b>		*Conflict of Interest (CR)	
		Distribution:	Health System Wide
		Pages 1 of	2
		Written	07/17/09
		Reviewed	
		Revised	
		Issued	08/17/09
		Discontinued:	

1. **PURPOSE:** To create an ethical and open work environment, to ensure that UABHS has a governance and accountability structure that supports its mission, and to encourage and enable directors, officers, employees and volunteers of UABHS to raise serious concerns about the occurrence of illegal or unethical actions within UABHS before turning to outside parties for resolution.
  
2. **PHILOSOPHY:** UABHS requires its directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities within UABHS. As representatives of UABHS, we must practice honesty and integrity in fulfilling our responsibilities and must comply with all applicable laws and regulations. .
  
3. **STANDARDS:**
  - 3.1. Reporting Responsibility:
    - 3.1.1. All directors, officers, employees and volunteers of UAB Health System have a responsibility to report any action or suspected action taken within UABHS that is illegal, unethical or violates any adopted policy of UABHS (“Violations”). .
    - 3.1.2. Anyone reporting a Violation must act in good faith, without malice to UABHS or any individual in UABHS and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred. A person who makes a report does not have to prove that a Violation has occurred. However, any report which the reporter has made maliciously or any report which the reporter has good reason to believe is false will be viewed as a serious disciplinary offense.
  - 3.2. No Retaliation:
    - 3.2.1. No one who in good faith reports a Violation or who, in good faith, cooperates in the investigation of a Violation shall suffer harassment, retaliation or adverse employment consequences. Any individual within UABHS who retaliates against another individual who has reported a violation in good faith or who, in good faith, has cooperated in the investigation of a Violation is subject to discipline, including termination of employment or volunteer status.
    - 3.2.2. If employees believe that an individual who has made a good faith report of a Violation or who has, in good faith, cooperated in the investigation of a Violation is suffering harassment, retaliation or adverse employment consequences, those employees should contact UABHS Human Resources or UABHS Legal Counsel.
  - 3.3. Reporting Process:
    - 3.3.1. All directors, officers, employees, and volunteers should address their concerns relating to a Violation to any person within UABHS who can properly address those concerns. In most cases, the direct supervisor of an employee or volunteer

is the person best suited to address a concern. However, if an employee is not comfortable speaking with their supervisor or if an employee is not satisfied with the supervisor’s response, the employee is encouraged to speak to UABHS Legal Counsel or to anyone in UABHS management the employee feels comfortable approaching. In addition, the employee may submit reports to the UAB Ethics Hotline by calling toll-free 1-866-362-9476 or filing a report on-line ([www.uab.edu/ethics](http://www.uab.edu/ethics)).

- 3.4. UABHS encourages anyone reporting a Violation to identify himself or herself when making a report in order to facilitate the investigation of the Violation. However, reports addressed to an individual within UABHS may be submitted on a confidential basis and reports may be submitted to the UAB Ethics Hotline anonymously.
- 3.5. UABHS Legal Counsel:
  - 3.5.1. A supervisor, manager and board member is required to notify UABHS Legal Counsel of every report of a Violation. Legal Counsel is responsible for promptly coordinating the investigation of all reported Violations and for causing appropriate corrective action to be taken if warranted by the investigation.
  - 3.5.2. The UABHS Audit and Compliance Committee is responsible for addressing all reported concerns or complaints of Violations relating to corporate accounting practices, internal controls or auditing. Therefore, UABHS Legal Counsel will notify the Audit & Compliance Committee of any such concern or complaint.
  - 3.5.3. UABHS Legal Counsel has direct access to the UABHS CEO and, if necessary, to the UABHS Board of Directors.

- 6. **REFERENCES:** None
- 7. **SCOPE:** This standard applies to UAB Health System
- 8. **ATTACHMENTS:** None

**INTERDISCIPLINARY COLLABORATION**

<i>None</i>	Endorsement Date
Physician / Medical Committees	Endorsement Date
<i>None</i>	Endorsement Date
Committees / Councils	Endorsement Date
<i>None</i>	Endorsement Date
Department(s)	Endorsement Date

**Tracking Record**

Action				Reasons for Development/Change of Standard							Change in Practice		
Devel- oped	Refor- matted	Re- viewed	Revised	Re- quired Review	Rele- vance	Ethics	Legal	New Knowl- edge	QA/I	Risk	No	Yes	Comment/ Explanation of Impact
X													
Supersedes:		None											
File Name:		Whistleblower Policy HA# 26											
REVISIONS: Consistent with Joint Commission Standards, this standard is to be reviewed at least every 3 years and/or as practice changes.													