

Otsego County Chapter NYSARC, Inc.

IV. POLICY TYPE: COMPLIANCE COMMUNICATION
POLICY TITLE: 2. Confidentiality and Non-Retaliation
Adopted 5/16/02

It is the policy of this Chapter that the identity of anyone who reports any suspected violation of this plan will be safeguarded to the extent possible. In addition, it is the policy of this Chapter that everyone who asks questions or reports possible non-compliant activities will be able to do so without fear of retaliation by the Chapter, employees, or agents.

Accordingly:

1. Names will not be required for any communication with the Compliance Officer.
2. Even if known, names will not be documented on the log of compliance requests/concerns.
3. All entries on the log of compliance requests/concerns will be assigned a number to be used in reference to the request/concern.
4. All entries on the log of compliance requests/concerns will be brought to the immediate attention of either the Executive Director or Assistant Executive Director. If names are known by the Compliance Officer, they will not be divulged.
5. The log of compliance requests/concerns will be brought to each meeting of the Compliance Committee for review. If names are known by the Compliance Officer, they will not be divulged.
6. Although it is the policy of this Chapter to keep confidential the identity of anyone who reports conduct that a reasonable person acting in good faith would have believed to be erroneous or fraudulent, the individual's identity may become known or may have to be revealed in certain instances.
7. Any threat of reprisal or retaliation against a person who adheres to his/her responsibilities under the Compliance Plan is acting against the Chapter's Compliance Policies. If threat of reprisal or retaliation is proven, discipline, including termination of employment, will result.