



POLICY AND PROCEDURE MANUAL

SUBJECT Non-Retaliation	ACCOUNTABILITY NMRE	Effective Date: 01/01/2022	Pages:
REQUIRED BY: The Whistleblowers' Protection Act 469 of 1980	BBA Section: PIHP Contract Section: Other:	Last Review Date:	Past Review Date:
Policy: <input checked="" type="checkbox"/> Procedure: <input type="checkbox"/>	Review Cycle: Annual Author: Compliance and Quality	Responsible Department: Compliance	Reviewers: Compliance and Quality

Definitions

Employee: Anyone working for the Northern Michigan Regional Entity (NMRE) and whose salary is paid by the NMRE.

Northern Michigan Regional Entity (NMRE): The PIHP for Region 2, the 21-counties located in Michigan's northern lower peninsula.

Purpose

The Northern Michigan Regional Entity (NMRE) believes that positive employee relations and morale can be achieved and maintained in a work environment that promotes ongoing open communication between management and employees. This policy provides guidelines for employees to communicate problems, concerns, and opinions without fear of retaliation, retribution, or harassment.

Policy

- 1) The NMRE strictly prohibits retaliation of any kind against any individual who reports an issue or a concern in good faith.
- 2) The NMRE employees and contractors are required to report in good faith all actual or potential wrongdoing which may include but is not limited to:
- 3) The NMRE's Management team will maintain an "open door" policy to allow individuals to express problems and concerns without fear of retaliation.
- 4) Every concern will be acted upon promptly and in an appropriate manner.

- 5) Employees who report concerns in good faith will not be subjected to retaliation, retribution, or harassment.
- 6) Employees shall never exempt themselves from the consequences of wrongdoing by self-reporting, although self-reporting may be taken into consideration in determining the appropriate course of action.
- 7) Anyone in violation of this policy will be subject to disciplinary action in accordance with NMRE policy.
- 8) Employees are not excused from continuing to perform their jobs or follow their department's legitimate workplace policies because they have filed a complaint or have participated in an investigation.

Approval Signature



NMRE Chief Executive Officer

12/14/21

Date

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Procedure

- 1) NMRE employees are required to timely report evidence of alleged improper activity by contacting their immediate supervisor, the Chief Compliance Officer, calling the anonymous compliance hotline, or sending an email to the compliance email. The compliance hotline and the compliance email are designed to allow individuals to raise concerns openly or anonymously or to seek clarification on compliance related issues.
- 2) Any instance of alleged retaliation, retribution, or harassment for making a report should be reported in the same manner as an alleged improper activity.
- 3) All managers/supervisors will maintain an open-door policy and take aggressive measures to ensure their staff that the NMRE truly encourages the reporting of concerns and the reassurances that there will be no retaliation, retribution, or harassment for reporting.
- 4) The Chief Compliance Officer will fully investigate any complaint or allegation of discriminatory or retaliatory behavior. If the Chief Compliance Officer finds that discriminatory or retaliatory behavior has occurred, the employee's manager/supervisor, the CEO, and Human Resources will be notified and appropriate action will be taken against the responsible employee.
- 5) If an employee has a concern, they should report it to their immediate manager/supervisor and/or the Chief Compliance, or Human Resources.
- 6) If the employee feels uncomfortable reporting a concern to their immediate manager/supervisor, the employee should report the concern directly to the Chief Compliance Officer or the compliance hotline or compliance email.
- 7) All concerns will be investigated within 15 days of receiving the concern and the findings will be communicated in writing to the reporting individual within 5 business days of completing the investigation.
- 8) Confidentiality regarding employee concerns will be maintained at all times in accordance with legal and ethical standards. Information will only be shared with those personnel who have a need to know.
- 9) Documentation of reported issues/concerns and investigation outcomes will be saved for at least 6 years.

References

- OCR Privacy Rule Summary
- Troklus D. & Warner G. (2006) Compliance 101 2nd Edition
- NMRE Employee Handbook
- NMRE Code of Ethics

Approval Signature



NMRE Chief Executive Officer

12/14/21

Date