

SUBJECT:	CONFIDENTIAL REPORTING OF FINANCIAL IMPROPRIETY OR MISUSE OF ORGANIZATION'S RESOURCES
RATIONALE:	To insure compliance with federal Sarbanes-Oxley Act / "Whistle Blower" policy
RESPONSIBILITY	All staff, board and volunteers

POLICY

Any member of the staff, board of directors, volunteers, consumers/program participants or community stakeholders affiliated with The Wellspring with information about known or suspected financial improprieties or misuse of the organization's resources or other ethical problems is encouraged to report their concerns to the President and CEO, who will then ask the Executive Committee of the Board to investigate.

No individual who in good faith reports an ethical violation or incident of fraud, waste or abuse shall suffer harassment, retaliation or adverse service delivery or employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Definitions of Fraud, Waste and Abuse as related to Service Delivery:

Fraud is intentional misrepresentation of information to gain undeserved payment or privilege.

Waste involves spending federal health care dollars on services that are unnecessary.

Abuse involves a questionable practice, which is inconsistent with accepted medical or business policies.

PROCEDURES:

The whistle blowing procedure is intended to be used for serious and sensitive issues. Individuals are encouraged to express concerns early so it is easier to take corrective action. Serious concerns relating to financial reporting, unethical or illegal conduct should be reported.

1. The corporation's open door policy suggests that individuals share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, the appropriate Program Director of the President & CEO is in the best position to address an area of concern.
2. In the event that any allegations involve the President and CEO, such conduct must be reported to the Chair of the Board of Directors who will initiate an appropriate investigation. The source of reports about financial improprieties and misuse of The Wellspring's resources will be held in confidence unless the individual who reports the situation agrees to reveal his/her identity or the report leads to legal action and a court order is issued for information regarding the case.
3. For suspected fraud, waste or abuse, or when an individual is not satisfied or uncomfortable with corporation's open door policy, he or she should contact the President & CEO, the Chair of the Board of Directors, or the appropriate Office of Inspector General (OIG).
4. Contact information for the Program Director, the President & CEO and the appropriate OIG Hotline will be posted in each office for individuals and consumers to access.

U.S. Department of Health & Human Services OIG Hotline
1 (800) 447-8477

U.S. Department of Housing & Urban Development OIG Hotline
1 (800) 347-3735

U.S. Department of Veterans Affairs OIG Hotline
1 (800) 488-8244

U.S. Department of Justice OIG Hotline
Submit complaints online: <https://oig.justice.gov/hotline/submit.complaint>