

## **New Jersey Health Care Quality Institute Whistleblower Protection Policy**

The New Jersey Health Care Quality Institute (“Quality Institute”) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Quality Institute, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the Quality Institute can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of the Quality Institute’s by-laws or operating procedures or suspected violations of law or regulations that govern the Quality Institute’s operations.

### **No Retaliation**

It is contrary to the values of the Quality Institute for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports a suspected violation, such as but not limited to, a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of the Quality Institute. 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.

### **Reporting Procedure**

The Quality Institute has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with the Quality Institute President & CEO, the Chief of Staff, or the Chairperson of the Board of Directors. Supervisors are required to report complaints or concerns about suspected ethical and legal violations in writing to the President & CEO, who has the responsibility to investigate all reported complaints. If the complaint is regarding the President & CEO, it should be reported by the supervisor to the Board Chairperson.

The Quality Institute’s President & CEO serves as its Compliance Officer, unless the Complaint is against the President & CEO and then the Board Chair shall serve as Compliance Officer. The Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Board of Directors of all complaints and their resolution and will report at least annually to the Finance Committee

Chair/Treasurer on compliance activity relating to accounting or alleged financial improprieties.

### **Accounting and Auditing Matters**

The Quality Institute's Compliance Officer shall immediately notify the Finance Committee Chair of any concerns or complaints regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

### **Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense. Confidentiality Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### **Handling of Reported Violations**

The Quality Institute's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.