



# Texas Healthcare Advisory Council

Policy Subject: <b>Whistleblower Protection</b>				
Board of Directors	Effective Date:	6/1/2020	Reviewed Date:	

## PURPOSE:

To maintain Texas Healthcare Advisory Council’s (THAC) integrity and high standards of business and personal ethics in the conduct of duties and responsibilities. To prevent or detect and correct improper activities. To encourage reporting individuals to report what he/she believes to be a material violation of law, policy, questionable accounting, or auditing matter. To promote an environment conducive to transparent communication regarding the organization’s business conduct.

This policy is intended to supplement local, state, and federal regulations governing whistleblower protection applicable to non-profit organizations.

## POLICY:

**Reporting Responsibility:** This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that THAC can address and correct inappropriate conduct and actions. It is the responsibility of all board members and members to report concerns about violations of THAC’s Code of Ethics or suspected violations of law or regulations that govern THAC’s operations.

**No Retaliation:** It is contrary to the values of THAC for anyone to retaliate against any board member, member, or guest who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of THAC.

**Reporting Procedure:** THAC has an open-door policy and suggests that members and guests share their questions, concerns, suggestions, or complaints with the Compliance Officer. If a member or guest is not comfortable speaking with the Compliance officer or is not satisfied with the Compliance Officer’s response, they will be encouraged to speak with a board member. Members of the Board are required to report complaints or concerns about suspected ethical and legal violations in writing to THAC’s Compliance Officer, who has the responsibility to investigate all reported complaints. Members and guests with concerns or complaints may also submit their concerns in writing directly to the Compliance Officer or President.

**Compliance Officer:** THAC’s 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 Treasurer on compliance activity relating to accounting or alleged financial improprieties.

**Accounting and Auditing Matters:** THAC’s Compliance Officer shall immediately notify the President of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the President 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.

**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:** THAC’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.

Compliance Officer: Brandon Woods