AMERICAN INDIAN HEALTH COMMISSION
POLICIES AND PROCEDURES

WHISTLEBLOWER PROTECTION POLICY

A. Application. This Whistleblower Protection Policy applies to all of the American Indian Health Commission (AIHC)'s staff, whether full-time, part-time, or temporary employees, to all volunteers, to all who provide contract services, and to all members, officers and directors, each of whom shall be entitled to protection.

B. Reporting Credible Information. A protected person shall be encouraged to report information relating to illegal practices or violations of policies of the AIHC (a "Violation") that such person in good faith has reasonable cause to believe is credible. The protected person shall file a "Whistleblower Complaint Form" with the Executive Director unless the complaint relates to the Executive Director, in which case the complaint shall be filed with the Chair of the Board who shall be responsible to provide an alternative procedure.

Anyone reporting a Violation must act in good faith and have reasonable grounds for believing that the information shared in the complaint indicates that a Violation has occurred.

C. Investigating Information. The Executive Officer shall promptly investigate each complaint and prepare a written report to the Board of Directors within five business days of receiving the Whistleblower Complaint Form. In connection with such investigation, all persons entitled to protection shall provide the Executive Director with credible information. All actions of the Executive Director in receiving and investigating the complaint, and additional information shall endeavor to protect the confidentiality of all persons entitled to protection.

D. Confidentiality. The AIHC encourages anyone reporting a Violation to identify himself or herself when making a complaint in order to facilitate the investigation of the Violation. However, Whistleblower Complaint Forms may be submitted anonymously and mailed to the Executive Director or the Chair of the Board. Complaints of Violations or suspected Violations will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable the AIHC or law enforcement to conduct an adequate investigation.

E. Protection from Retaliation. No person entitled to protection shall be subjected to retaliation, intimidation, harassment, or other adverse action for reporting information in

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accordance with this Policy. Any person entitled to protection who believes that he or she is the subject of any form of retaliation for such participation should immediately report the same as a violation of and in accordance with this Policy.

Any individual within the AIHC who retaliates against another individual who has reported a Violation in good faith or who, in good faith, has cooperated in the investigation of a Violation is subject to discipline, including termination of employment or volunteer status.

F. Dissemination and Implementation of Policy. This Policy shall be disseminated in writing to all affected constituencies.

The Executive Director shall be responsible for implementation of this Policy, which may include the following:

(1) dissemination of this policy to all parties listed in Section A.
(2) documenting reported violations;
(3) working with legal counsel to decide whether the reported violation requires review by the Executive Director or should be directed to another person or department;
(4) keeping the board of directors [and the audit committee or other applicable committee] informed of the progress of the investigation;
(5) interviewing complainants and witnesses;
(6) requesting and reviewing relevant documents, and/or requesting that an auditor or counsel investigate the complaint; and
(7) preparing a written record of the reported violation and its disposition, to be retained for a specified period of time.

Whistleblower Complaint Form - AIHC Policies and Procedures 5-1-14.docx