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Non Retaliation, Enterprise Compliance: Reports of Noncompliance, 10729

Policy/Procedure

PURPOSE:

To protect employees and others from intimidation, threats, coercion, discrimination, or other retaliatory action for good-faith reporting of non-compliance.

POLICY:

Seattle Children's is committed to compliance with all laws and regulations that govern its operations and wishes to foster an environment in which employees and others feel free to report in good faith possible instances of non-compliance.

PROCEDURE:

I. Workforce Members Obligated to Report

It is the responsibility of each workforce member of Seattle Children's to report perceived misconduct, including actual or potential violations of laws, regulations, procedures, the Seattle Children's Compliance Code of Conduct, Seattle Children's Corporate Compliance Program, or policies, including but not limited to Seattle Children's **P&P: [Anti-Racism Policy. 13121](#)** and **P&P: [Unlawful Harassment. 11103](#)**. Workforce members may report misconduct to their supervisor, their higher level manager or director, or the compliance officer, or may use the confidential reporting mechanism accessible on CHILD; go to the CHILD home page and click on "Compliance Reporting" under the Applications column. Workforce members may also call the Compliance Helpline to report compliance concerns at 1-877-483-3049.

II. Management Has Open-Door Policy

All management employees, including supervisors, managers, directors, compliance officers, and administrators, will maintain an "open-door policy" to encourage employees, vendors, patients, and others to report problems and concerns. Any person who receives a report of perceived wrongdoing or violation shall forward the report to the Corporate Compliance Officer. Vendors must comply with **P&P: [Vendor Conduct. 11133](#)** when bringing forward a compliance concern.

III. Reports Must Be Good Faith, Reasonable

This non-retaliation policy applies to all reports or expressions of opposition to Seattle Children's procedures that are held in good faith and that are expressed in a manner that is reasonable and that does not violate the law, including reporting to agencies as indicated below in Section IV.B. Both federal and state laws prohibit retaliation against those who report in good faith.

IV. Seattle Children's Will Not Retaliate

Seattle Children's will not retaliate through harassment, intimidation, denial of promotion or raises, or

loss of employment or business opportunities, or in any other manner against employees, or other individuals, for:

- A. Exercising any right under or participating in any process established by applicable federal, state, or local law or regulations or Seattle Children's policies;
- B. Making a good-faith complaint with Seattle Children's, any third-party payer, or any state or federal regulatory or law enforcement agency, including the Office of Inspector General and the Department of Health and Human Services;
- C. Testifying, assisting, or participating in an investigation, compliance review, proceeding or hearing; or
- D. Opposing in good faith any act, practice, or procedure that violates federal, state, or local law or regulation or that is improper according to Seattle Children's policies.

V. Violators Subject to Discipline

Any employee of Children's who violates this non-retaliation policy may be subject to discipline, up to and including termination of employment. Any non-employee workforce member of Children's who violates this non-retaliation policy may be subject to applicable sanctions, up to and including loss of medical staff privileges, loss of the ability to conduct research at Seattle Children's Research Institute (SCRI), cancellation of vendor contracts and termination of volunteer service. In addition, if applicable, information regarding violations of this policy by non-employee workforce members may be shared with the workforce member's employer.

REFERENCES:

P&P: [Enterprise Compliance: Prevention of Fraud, Waste, and Abuse, 10860](#)

P&P: [Corporate Compliance Program, 10307](#)

Attachments

No Attachments

Approval Signatures

| Step Description | Approver | Date |
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