

AdvocateAuroraHealth

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Content Applies to Patient Care: (Select all that apply) <input type="checkbox"/> Adults <input type="checkbox"/> Pediatrics (Under 18)	Content Applies to: (Select One) <input type="checkbox"/> Clinical <input checked="" type="checkbox"/> Administrative	Next Review Date: 02/24/2023
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I. PURPOSE

To promote reporting of compliance, ethical, civil rights/discrimination, harassment and other concerns by assuring there will be no retaliatory actions taken when a caregiver reports a concern in good faith.

II. SCOPE

This policy applies to Advocate Aurora Health, Inc. and any entity or facility owned and controlled by Advocate Aurora Health.

III. DEFINITIONS/ABBREVIATIONS

Advocate Aurora Team Member or Team Member: anyone employed or non-employed with Advocate Aurora Health who provides services on behalf of Advocate Aurora Health. All Advocate Aurora Health team members are expected to abide by Advocate Aurora Health policies and procedures.

In Good Faith: in accordance with standards of honesty and sincerity. This definition does not require that the suspected violation be an actual violation.

Retaliation: a prohibited action taken against an Advocate Aurora Team Member because of his or her Good Faith reporting of a perceived or actual violation of the law, becoming a whistleblower or participation in a legally protected activity, such as reporting suspected harassment, fraud and abuse.

Retaliatory Actions: include, but are not limited to: threatening, coercing, discriminating against, harassing, suspending, terminating, and demoting the Advocate Aurora Team Member.

IV. POLICY

A. Retaliation Prohibited

1. Advocate Aurora Health will not take any Retaliatory Action against an Advocate Aurora Team Member who in Good Faith and with honest and non-malicious intent reports or threatens to report a concern or information about a situation he or she believes:
 - a) Violates one or more laws or regulations;
 - b) Violates an Advocate Aurora Health policy and/or procedure;
 - c) Is inconsistent with Advocate Aurora Health's Code of Conduct;
 - d) Is inappropriate, unethical, or potentially illegal;
 - e) Represents a gross waste or mismanagement of federal funds, abuse of authority in regard to federal funds or a danger to public health or safety; or
 - f) Otherwise compromises the quality or safety of patient care.
2. Advocate Aurora Health will not discharge, demote, suspend, threaten, harass, or in any other manner engage in Retaliation against an Advocate Aurora Team Member because he or she has filed a qui tam (whistleblower) lawsuit.
3. Advocate Aurora Health will not tolerate any Team Member deliberately making false or malicious accusations against another Team Member. Such actions may result in corrective action.

B. Responding to Reports of Retaliation

1. The Compliance & Integrity, Legal, Security and Human Resources Departments will collaborate to investigate reports of Retaliation in a prompt, discreet, objective and professional manner in accordance with an established investigation protocol.
2. Should a report of Retaliation be confirmed, appropriate corrective actions, up to and including termination of employment, will be imposed on the individual or individuals involved.

V. PROCEDURE

- A. Team Members are expected to report potential Retaliation to the Compliance & Integrity or Human Resources Department (see the Advocate Aurora Health System Policy, Reporting Compliance Concerns).

VI. CROSS REFERENCES

Advocate Aurora Health Code of Conduct
Aurora Health System Policy, Detecting and Responding to Fraud, Waste, and Abuse Policy
Advocate System Policy, False Claims Act
Advocate System Policy, General and Sexual Harassment Policy
Aurora System Policy, Harassment

Advocate Aurora Health System Policy, Reporting Compliance Concerns

VII. RESOURCES AND REFERENCES

Investigation Protocol for Alleged Team Member Misconduct
Wisconsin Health Care Worker Protection Statute (WI s.146.997)
Illinois Whistleblower Act (52 ILCS 395)
Federal False Claims Act (31 USC § 3729-3733)
Whistleblower Protection Enhancement Act of 2012