

<b>Title: Whistleblower Policy</b>					<b>Number:</b> 1000.v2
<b>Policy Owner:</b> Compliance and CQI Director	<b>Old Number:</b> N/A	<b>Effective Date:</b> 6/1/2015	<b>Date Revised:</b> 5/19/2015	<b>Rev #</b> 2	<b>Page 1 of 3</b>

## 1.0 BACKGROUND AND PURPOSE

The Jewish Social Service Agency and Premier Homecare (collectively “JSSA” or “the agency” for purposes of this policy) are committed to operating with integrity in full compliance with this law and conducting business with the highest standards of ethical, moral and legal conduct and responsibility.

Consistent with this commitment, JSSA encourages employees, volunteers, consultants, vendors, business associates and board members to come forward with credible information on illegal practices or serious violations of adopted policies of the agency. This policy is intended to provide a means for these individuals to raise concerns with JSSA prior to seeking resolution outside of the agency and the reassurance that they will be protected from reprisals or victimization and harassment when reporting in good faith.

### 2.0-3.0 APPLICABILITY AND SCOPE

JSSA encourages all employees, volunteers, consultants, vendors, business associates and board members to report suspicions of malpractice stemming from possible noncompliance with federal, state, local laws or regulations, and/or internal policies.

## 4.0 POLICY

### 4.1 Policy Statement and Reporting Procedure

Employees, volunteers, consultants, vendors, business associates and board members are expected to bring any alleged unlawful activity, policy, or practice to the attention of JSSA and provide management with a reasonable opportunity to investigate and correct the alleged unlawful activity.

An employee, volunteer or consultant should report evidence of alleged violations by contacting his or her immediate supervisor, either orally or in writing. However, if an employee, volunteer or consultant is not comfortable speaking with his or her supervisor or is not satisfied with his or her supervisor’s response, the employee, volunteer or consultant should contact the supervisor’s supervisor, Human Resources, the Compliance and Continuous Quality Improvement (CQI) Director, or anyone in senior management whom they feel comfortable approaching. Supervisors are required to report suspected violations to the Compliance and CQI Director.

Employees, volunteers, consultants, vendors, business associates and board members may also write a letter to the Compliance and CQI Director at 200 Wood Hill Road, Rockville, Maryland, 20850, utilizing interoffice mail or regular mail. If they are not satisfied with the response or are uncomfortable for any reason addressing such concerns to those listed above, the Chairman of the JSSA Compliance Committee, Harold Krauthamer, may also be contacted by email at [Harold@krauthamerstahl.com](mailto:Harold@krauthamerstahl.com) or by phone at 240-353-6339.

If an employee, volunteer, consultant, vendor, business associate or board member does not feel comfortable using any of the channels listed above, they may use the Compliance and Ethics Hotline. This hotline uses an online case management system and a toll-free number, web address, and an e-mail address. All reports will be assigned a unique File ID with no identifying information unless the reporter chooses to leave information to identify him/herself. Upon submission of the report, the reporter may

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also use their unique File ID to get a status update on your report. See the Compliance and Ethics Hotline Policy for more information.

Employees, volunteers, consultants, vendors, business associates and board member are encouraged to provide as much specific information as possible including names, dates, places, and events that took place, and their perception of why the incident(s) may be fraudulent, unethical, illegal or dangerous. JSSA will conduct a prompt, discreet, and objective review or investigation.

#### **4.2 Non-Retaliation**

JSSA prohibits retaliation by or on behalf of the agency against employees, volunteers, consultants, vendors, business associates and board member for making good faith complaints, reports or inquiries or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but proven to be mistaken. If an employee, volunteer, consultant, vendor, business associate or board member perceives that they are being retaliated against after making a report, this should be promptly reported to the program supervisor, Human Resources, or to the Compliance and CQI Director. The employee, volunteer, consultant, vendor, business associate or board member will be referred to the appropriate office to file an administrative grievance procedure.

#### **4.3 Confidentiality**

Every effort will be made to protect the reporter's identity. The information provided in a report may be the basis of an internal and/or external investigation conducted by JSSA and/or its counsel into the issue being reported. It is possible that as a result of the information provided in a report the reporter's identity may become known during the course of the investigation. The reporter's anonymity will be protected to the extent possible by law.

#### **4.4 Policy Compliance**

An employee, volunteer, consultant, vendor, business associate and board member who intentionally reports malicious and false allegations, abuses this policy, or anyone who takes retaliatory action against an individual who made a report, may receive disciplinary action, leading up to and including termination.

### **5.0 INTERNAL COMPLIANCE INVESTIGATIONS**

The Compliance and CQI Director will retain documentation of all reports regarding possible compliance violations. He or she will also coordinate and consult with the Chief Executive Officer and outside counsel, as necessary, to determine, based on the subject matter of the possible violation and its severity, whether further investigation is necessary. If further investigation is necessary, the Chief Executive Officer or outside counsel will advise whether the Compliance and CQI Director should personally investigate the report, refer the report to an appropriate department for investigation, or engage an independent third party, such as independent legal counsel, to investigate the report. At a minimum, internal investigations will include a review of all material and relevant facts, as well as interviews, as appropriate. All employees, volunteers, consultants, vendors, business associates and board members are expected to cooperate fully with any requests made of them in connection with any such investigation and to provide truthful and accurate information.

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## 6.0 RESPONSIBILITIES

The Compliance and CQI Director shall administer this policy and is authorized to make modifications to this policy to ensure that it is in compliance with local, state and federal laws or regulations.

## 7.0 QUESTIONS

Questions concerning the administration, interpretation or compliance of the Whistleblower Policy or its application, particular compliance issues and their application to JSSA or to an employee, volunteer, consultant, vendor, business associate and board member should be directed to the Compliance and CQI Director. In addition, the Code of Ethics and Professional Conduct should be used for additional information on the types of compliance concerns that should be reported, the rights and responsibilities of employees, volunteers, consultants, vendors, business associates and board member to report concerns, and other information relevant to reporting such concerns.

### Version Control

Version Number	Date	Applicable Section	Comments	Approver/Todd Schenk, CEO
V.2	05/19/15	Entire Policy	N/A	