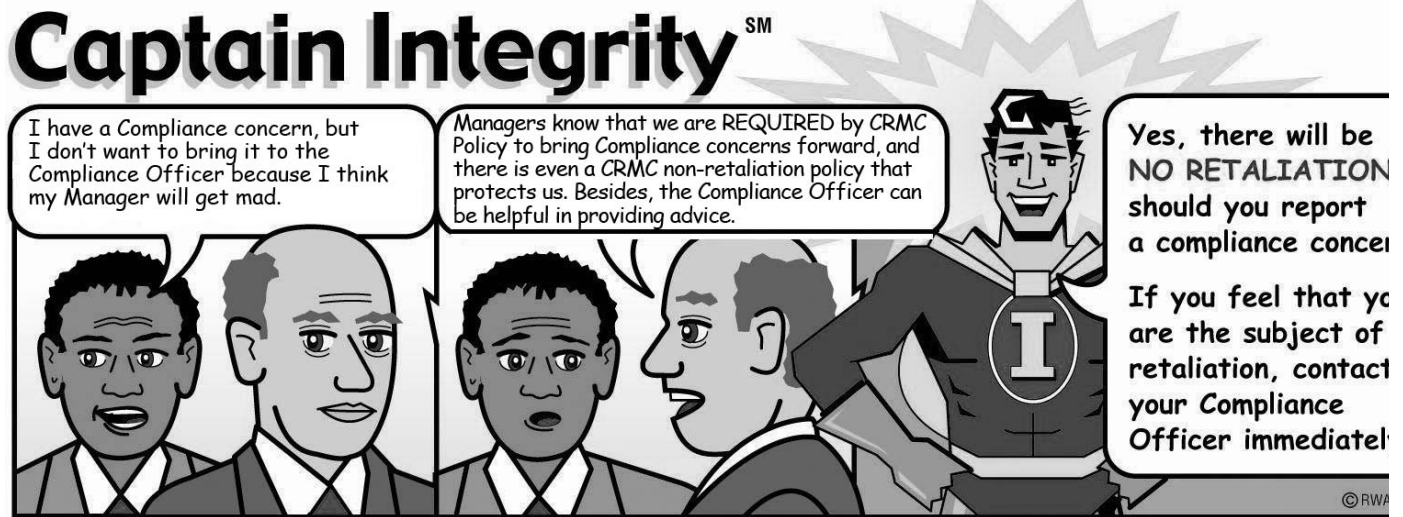


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Greater Hudson Valley Health System's Non-Retaliation Policy/Procedure

This is the non-retaliation policy and procedure developed by the upstate New York health system, says Trish Manna, corporate compliance officer and director of audit & HIPAA privacy. She also emails different versions of the cartoon to employees to approximate reports of alleged retaliation, although they are almost always related to human resource rather than compliances violations. Contact Manna at tmanna@ghvhs.org



Background

It is the belief of GHVHS (ORMC & CRMC) that positive employee relations and morale can be best achieved and maintained in a working environment that promotes ongoing open communication between supervisors and employees. This includes open and candid discussions of staff problems and concerns. We, therefore, encourage staff to express their problems, concerns, and opinions on any issue. We also recognize that one of the requirements of the U.S. Sentencing Commission "Guidelines for Organizations" is that an organization evidences a policy of non-retaliation/non-retribution for employees who report violations of law, regulations, policies, and the Code of Conduct.

Purpose

The purpose of this policy is to provide guidance by which employees can express problems, concerns, and opinions without fear of retaliation or reprisal, as well as providing supervisors with appropriate guidelines for addressing problems and concerns raised by employees. Human Resources policies provide a similar procedure that also allows staff to express problems, concerns or opinions about conduct or performance issues.

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