



NON-INTIMIDATING AND NON-RETAIILIATION (WHISTLEBLOWER) POLICY

It is the intent of JASA to adhere to all laws and regulations that apply to the organization and the purpose of this policy is to support the organization's goal of legal compliance. JASA encourages all personnel, acting in good faith, to report suspected or actual wrongful conduct. JASA is committed to protecting individuals from interference with making a protected disclosure, from retaliation for having made a protected disclosure, and for otherwise fulfilling any of their compliance obligations.

Personnel have an affirmative duty to JASA and to our clients to report actions or behaviors they believe, in good faith, violate ethical practices, law, or regulation. Any personnel who fail to report these violations may be subject to disciplinary procedures. JASA encourages questions and/or reports by investigating each report to determine the extent of the problem and by taking corrective action(s), if needed.

Personnel may report in any of the following ways:

- **COMPLIANCE HOTLINE:** Directly to the Risk and Compliance Officer and/or Ombudsperson through the hotline number at 212-273-5288.
- **VOICE MAIL OR FACE-TO-FACE REPORTS:** Voice mail or face-to-face reports to the Risk and Compliance Officer or any manager or supervisor may be made at any time. In all cases, managers or supervisors who get a reports will be required to discuss the report with the Risk and Compliance Officer.
- **MAIL AND E-MAIL:** Personnel may use mail or email to report problems or concerns. Mail or email can be directed to the Risk and Compliance Officer or to another manager or supervisor. In all cases, managers or supervisors who get a report will be required to discuss the report with the Risk and Compliance Officer.

To the extent possible, all reports will be handled in a manner that protects the confidentiality of the reporter, if requested. However, there may be circumstances in which confidentiality cannot be maintained. Examples of this include situations where the problem is known to only a very few people or situations in which the government or one of JASA's payers or funders must be involved. In these cases, disclosure of the name of the individual who first brought the problem to the attention of JASA will be required. JASA will take all steps to ensure that the reporter will not suffer any retaliation for good faith actions.



JASA personnel who are aware of or suspect that a policy, practice, or activity of JASA is in violation of law or, who are aware of or suspect wrongful conduct on the part of JASA or any JASA personnel are encouraged to report such information to the Chief Executive Officer, Chief Operating Officer, Risk and Compliance Officer, the Director of Human Resources, or the President of the JASA Board of Trustees.

Anyone making a protected disclosure or filing a complaint concerning a violation or suspected violation of this policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the policy.

Any personnel who knowingly or with reckless disregard for the truth gives false information or knowingly makes a false report of wrongful conduct or a subsequent false report of retaliation will be subject to disciplinary action. Allegations made in good faith that are not substantiated are not subject to corrective action.

Retaliating, including but not limited to threatening, harassing, or imposing adverse employment consequences against any individual for making or threatening to make a protected disclosure is prohibited. Any person who retaliates in any form against any individual who makes or is considering making a protected disclosure is subject to disciplinary action. This Whistleblower Policy is intended to encourage and enable personnel and others to raise serious concerns within JASA prior to seeking resolution outside the agency.

Protected disclosures may be made on a confidential basis by the complainant or may be submitted anonymously through the Compliance Hotline. Protected disclosures and investigatory records will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, and in accordance with applicable regulations or law.

Reporters will be contacted to acknowledge receipt of the reported violation or suspected violation within ten working days for most issues and within 24 hours for alleged criminal or environmental violations. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

The protections of this policy do not apply:

- To untruthful or unfounded allegations of wrongdoing;
- To any allegations whose nature or frequency indicates an intent to harass or embarrass JASA or its personnel; and
- In instances where personnel report their own lapses or complicity in unacceptable conduct. In such instances, the act of reporting will not be subject to sanctions, but the underlying conduct may still be subject to disciplinary action up to and including discharge from employment.



If you suspect that there may be an occurrence of
Fraud, Waste, or Abuse of Medicaid Resources or other compliance
concerns

You can contact the JASA
Anonymous Compliance Hotline
212 - 273 - 5288



If you wish to speak directly with the
JASA's Risk and Compliance Officer
please contact:

Debra Milton-Grant, MPH, MBA
(212) 273-5296
dmilton@jasa.org

You can send written correspondence to:

JASA
247 West 37th Street, 9th Floor
New York, NY 10018

E-mail can also be sent to complianceconcerns@jasa.org