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Owner Ximena Restrepo:
Compliance and
Privacy Partner
Area Compliance
Applicability Logan System

Nonretaliation/Nonretribution Policy, A333

PURPOSE

To promote positive employee relations and morale in a working environment where ongoing open communication between supervisors and their employees occurs without fear of retaliation or retribution.

POLICY

1. Logan Health promotes a culture of compliance. Logan Health does not intimidate or retaliate against employees, individuals, or others for:
 - A. Exercising any right under, or participating in any process established by federal, state, or local law, regulations, or policy;
 - B. Filing a complaint with the company and/or the Department of Health and Human Services or other government agency.
 - C. Testifying, assisting, or participating in an investigation, compliance review, proceeding, or hearing; or
 - D. Opposing in good faith any act or practice made unlawful by federal, state, or local law, regulation, or policy, provided that the manner of the opposition is reasonable and does not itself violate law.
2. Employees who report concerns in good faith will not be subjected to retaliation, retribution, or harassment. No employee is permitted to engage in retaliation, retribution or any form of harassment against another employee for reporting compliance-related concerns.
3. Employees are responsible for promptly reporting actual or potential wrongdoing, including an actual or potential violation of law, regulation, policy, or procedure. The Compliance Department maintains an "open door policy" to allow individuals to report problems and concerns. The Compliance Department acts upon each concern promptly and appropriately.

4. Logan Health has an external Integrity Helpline to permit individuals to call or electronically report problems and concerns or to seek clarification of compliance-related matters anonymously or in confidence.
5. Employees cannot exempt themselves from the consequences of wrongdoing by self-reporting, although self-reporting may be taken into account in determining the appropriate course of action.

PROCEDURE

1. Knowledge of actual, suspected or potential wrongdoing, misconduct, or violations of the compliance plan must be promptly reported to management, the Compliance Department, or the Integrity Helpline.
2. All managers and supervisor must take measures to encourage their staff to report problems and ensure staff they will not be disciplined for doing so. The following actions are taken:
 - A. Senior management educates managers on this policy, including the proper treatment of employees and the creation of a work environment that facilitates open communication;
 - B. Post this policy on employee bulletin boards; and
 - C. All employees will review aspects of nonretaliation/nonretribution during annual Code of Conduct training.
3. Reports are investigated thoroughly and expeditiously.
4. If employees have concerns, they should be addressed in the following order:
 - A. Immediate supervisor
 - B. Department manager
 - C. Department director
 - D. Chief Compliance Officer
 - E. Chief Executive Officer
5. If an employee feels uncomfortable with the above or feels that the concern is not being addressed, the employee may report concerns directly to the Chief Compliance Officer, or Compliance Department. Employees may also report concerns directly to the Integrity Helpline (reference: Policy A332.)
6. Confidentiality regarding employee concerns and problems will be maintained at all times, insofar as legal and practical, informing and involving only those personnel who have a business need to know.

The following persons are accountable for implementing, educating, and requiring compliance with this policy.

- Chief Compliance Officer / Privacy Officer
- Chief Human Resources Officer
- Chief Executive Officer

REFERENCE

Code of Conduct - A302; Integrity Helpline A332

Approval Signatures

Step Description	Approver	Date
Final Admin Approval	Robyn Whalen: System Director of Compliance Regulatory	05/2024
Policy Committee	Kelly Stimpson: Associate General Counsel	05/2024
Reviewer 2	Amber Simonds: System Director Privacy	05/2024
Owner	Ximena Restrepo: Compliance and Privacy Partner	05/2024

Applicability

Logan Health (locations excluding LHMC), Logan Health Chester, Logan Health Conrad, Logan Health Cut Bank, Logan Health Medical Center, Logan Health Shelby, Logan Health Whitefish