

A. Whistleblower Protection Policy

1. Purpose

To define how Capital Area Health Consortium provides for the protection of its' residents/fellows and other employee's from retaliation who, in good faith, participates in investigations or reports alleged violations of policies, laws, rules or regulations.

2. Policy Statement

Capital Area Health Consortium encourages individuals to bring forward information and/or complaints about violations of state or federal law, company policy, rules or regulations. Retaliation against any individual who, in good faith, reports and/or participates in the investigation of alleged violations, or who assists others in making such a report, is strictly forbidden.

3. Application

The Whistleblower Protection Policy applies to all of the Consortium's medical (including residents and fellows), dental and other employees, whether full-time, part-time, or temporary, each of whom shall be entitled to protection (referred to as a "Protected Person") under this Policy and the law. This policy does not protect individuals who knowingly files a report or provides information as part of an investigation that is made in bad faith (e.g., knowingly false) or false. Capital Area Health Consortium will take appropriate action, including disciplinary action up to and including termination of any resident, fellow, employee, or affiliated person who violates this policy.

4. Reporting Credible Information

A Protected Person shall be encouraged to report factual information relating to illegal practices or violations of Federal, State or local laws and violations of any Consortium policies (collectively called a "Violation") that such Protected Person in good faith has reasonable cause to believe has occurred. Any potential Violation shall be reported to the Consortium's Executive Director, Chairperson or any Officer of the Consortium's Board of Trustees. Any report of a potential violation that is made in bad faith (e.g., knowingly false) or false statement made by a witness employee will result in at least disciplinary action up to and including termination of employment.

5. Investigating Information and Confidentiality

The Executive Director, Board Chairperson or their designee shall promptly investigate each such credible report. The Consortium encourages anyone reporting a potential Violation to identify himself or herself when making a report to facilitate the investigation. However, reports may be submitted anonymously in writing by sending it through email or mail to CAHCgroup@uchc.edu or _CAHC, 270 Farmington Avenue, Ste. 352

Farmington, CT 06032. Reports of a potential Violation will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or to enable the Consortium, law enforcement, and/or a Member Hospital to conduct an adequate investigation. Cooperation of all individuals with the investigation is necessary and required.

6. Member Hospitals

In addition to the Consortium Whistleblower Protection Policy, each placed medical or dental resident or fellow is expected to follow and has protection under the Member Hospital's policy. If a medical resident or fellow has any questions on a particular Member Hospital's whistleblower policy, please contact Capital Area Health Consortium by emailing CAHCgroup@uchc.edu, by telephone at (860) 676-1110, or by mail to CAHC, 270 Farmington Avenue, Ste. 352 Farmington, CT 06032. The Consortium will provide the contact at each Member institution. Because a Member Hospital may have a whistleblower policy does not interfere with or limit a Protected Person's rights to report a potential Violation under the Consortium's Policy.

7. Protection from Retaliation

Each Protected Person, which includes cooperating witnesses, are entitled to protection from retaliation or harassment. Any Protected Person who believes that he or she is the subject of any form of retaliation or harassment because they reported a potential Violation or participated in the investigation, should immediately report it to Capital Area Health Consortium for referral to the appropriate department by emailing CAHCgroup@uchc.edu, by telephone at (860) 676-1110, or by mail to CAHC, 270 Farmington Avenue, Ste. 352 Farmington, CT 06032. Any Consortium employee who retaliates against another employee who has reported a potential Violation in good faith or who, in good faith, has cooperated in the investigation of a potential Violation is subject to at least discipline, up to and including termination of employment.

Approved: 2/23/2022