

Policy

The Hospice Medical Director Certification Board (HMDCB) is committed to preventing reprisals against HMDCB volunteers and staff members who report activity undertaken by HMDCB volunteers and/or staff in connection with: (i) the performance of official HMDCB activity that may be in violation of state or federal law or (ii) questionable corporate accounting practices, internal controls, or audit matters (collectively referred to as “Protected Disclosure”). A whistleblower as defined by this policy is an HMDCB volunteer or staff member who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy.

HMDCB, and any individual associated with the HMDCB, will not:

- Take any retaliatory action against an HMDCB volunteer or staff member who has made a Protected Disclosure or who has refused to obey an illegal or unethical request, including interference with their lawful employment or livelihood; or
- Directly or indirectly use or attempt to use the official authority or influence of their position for the purpose of interfering with the right of a volunteer or staff member to make a Protected Disclosure to HMDCB leadership.

Reporting Violations

All reports of suspected illegal, unethical or otherwise fraudulent conduct should provide as much specific information as possible including names, places, and events that took place, etc. Reports are encouraged to be made in writing but oral communication will also be accepted. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures.

Compliance Officer

HMDCB’s Compliance Officer is the President of the Board of Directors. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning Protected Disclosures within a reasonable period of time and, depending on the nature of the complaint (as set forth below), advising the Executive Director and/or the President-Elect. In matters involving the President of the Board of Directors, the Immediate Past President will serve as the designated Compliance Officer.

Directors and Volunteers

HMDCB has an open door policy and suggests that directors and volunteers share their questions, concerns, suggestions or complaints with someone who can address them properly. If they choose to do so, in most cases they should contact the HMDCB Compliance Officer directly.

Employees and Independent Contractors

Any staff member affiliated with the HMDCB and directly employed by Association Management Center, Inc. (AMC) should follow the steps outlined in the AMC Whistleblower Policy. Independent contractors should direct questions, concerns, suggestions or complaints to the HMDCB Executive Director. In matters involving the Executive Director, the HMDCB Compliance Officer or an AMC Principal may be consulted.

The Compliance Officer shall immediately notify the Board of Directors of all reported concerns or complaints concerning Protected Disclosures. The Compliance Officer shall refer all other issues to the Executive Director, and may also engage HMDCB's designated legal counsel as the Compliance Officer deems appropriate.

Accounting and Auditing Matters

The Secretary/Treasurer shall address all reported concerns or complaints involving financial wrongdoing, corporate accounting practices, internal controls, or auditing. The Compliance Officer shall work with the Secretary/Treasurer until such matters are resolved. HMDCB's designated legal counsel may also be engaged if necessary.

Confidentiality

Protected Disclosures may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and to provide accused individuals their legal rights of defense.

Handling of Reported Violations

The Compliance Officer will promptly notify the sender and acknowledge receipt of a Protected Disclosure (unless such report was submitted anonymously). All reports will be investigated promptly and appropriate corrective action will be taken if warranted by the investigation. Reports and copies of Protected Disclosures shall be retained by the HMDCB in accordance with applicable record retention policies. HMDCB's designated legal counsel may also be engaged if necessary.