

POLICY AND PROCEDURE MANUAL

Pennington Biomedical	POLICY NO. 414.00	ORIGIN DATE: 6/13/14
IMPACTS:	All Employees	LAST REVISED: 8/25/14
SUBJECT:	Whistleblower/Non-retaliation	EFFECTIVE: 8/25/14
SOURCE:	Legal and Regulatory Affairs	VERSION NO. 1

PURPOSE

The Pennington Biomedical Research Center holds its workforce members responsible for reporting any activities to authorities appropriate when, in good faith, they believe that the Pennington Biomedical has engaged in conduct that violates criminal or civil law, professional or clinical standards, or internal policies and procedures, including Permanent Memoranda and institutional policies. Pennington Biomedical will take all necessary steps to refrain from intimidating, threatening, coercing, discriminating against, or taking any other retaliatory action against any employee, individual, or other for the exercise of any right under or for participation in any process established applicable laws or regulations. This policy is developed to comply with statutory whistleblower laws, including but not limited to 42 CFR Part 93, 45 CFR 164.530(g), 41 USC 4712, LA R.S. 23:968, and LA 39:2163

POLICY

1. It is the responsibility of all Pennington Biomedical employees to report perceived misconduct, including actual or potential violations of state and federal laws and regulations, internal policies and procedures, Permanent Memoranda of the LSU System, and institutional policies.
2. Pennington Biomedical will maintain an “open-door policy” at all levels of management to encourage employees to report problems and concerns.
3. Pennington Biomedical will follow all necessary procedures to protect against any retaliation toward any employee, faculty, staff, or other individual, including any of its facilities, for exercising their rights or participating in any process pursuant to internal policies, applicable law, or regulation.
4. Any employee who commits or condones any form of retaliation will be referred to the Pennington Biomedical Office of Human Resource Management and its policies on discipline up to, and including, termination.

PROCEDURE

- 1) Pennington Biomedical will not retaliate against workforce members, 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 Compliance Officer, Human Resources, supervisor or the agencies of the federal or state government or any other regulatory agency or legal authority;
 - 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) The Pennington Biomedical Compliance Officer will coordinate a team with the appropriate individuals to investigate all allegations of non-compliance with Pennington Biomedical's practices.

If you need to report possible fraudulent, unethical, or otherwise inappropriate behavior in violation of Pennington Biomedical and/or LSU by-laws, or policies, reporting can be done anonymously through the compliance hotline on the PBRC webpage.



Policy Committee Secretary's Attestation

Date of Policy Committee Meeting: 8/21/2014

Policy #: 414.00 Whistleblower/Non-retaliation Policy

Date of Approval: 8/21/2014

Publication Date: 9/3/2014

Effective Date: 8/21/2014

Anne Duke

Anne Duke, Policy Committee Secretary

9/2/14

Date

Approval by the Executive Director

William T. Cefalu

William T. Cefalu, MD
Executive Director

9/4/14

Date