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<b>Subject</b>	Non-Retaliation
<b>Index Number</b>	GB-3032
<b>Section</b>	Compliance
<b>Subsection</b>	General
<b>Category</b>	Corporate
<b>Contact</b>	Peter Weidenheim
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### References

- Office of Inspector General Compliance Program Guidance for Hospitals, February 23, 1998
- Deficit Reduction Act of 2005, P.L. 109-71
- False Claims Act, 31 U.S.C. s. 3730 (h)

### Applicable To

All employees of Gundersen Boscobel Area Hospital & Clinics a Gundersen Health System affiliate hereafter referred to as “Gundersen Boscobel”.

### Detail

Gundersen Boscobel recognizes that a critical aspect of its Compliance Program is the establishment of a culture that promotes prevention, detection, and resolution of instances of conduct that does not conform to federal or state requirements, as well as our ethical and business policies. To promote this culture, Gundersen Boscobel has established a non-retaliation policy to protect employees and others who report problems and concerns in good faith. Any form of retaliation or retribution can undermine the problem resolution process and result in a failure of communication channels in the organization.

The False Claims Act and many related state acts contain a section designed to prevent retaliation by an employer against an employee who reports fraud through the filing of a civil false claims action on behalf of the government. The non-retaliation section of the False Claims Act provides the following: Any employee who is discharged, demoted, suspended, threatened, harassed or in any other manner discriminated against in the terms and conditions of employment by his or her employer because of lawful acts done by the employee on behalf of the employee or others in furtherance of an action under this section, including investigations for, initiation of, testimony for, or assistance in any action filed or to be filed under this section shall be entitled to all relief necessary to make the employee whole. [31 U.S.C. s. 3730 (h)].

### Implementation

Any form of retaliation against any employee who reports a perceived problem or concern in good faith is strictly prohibited. Knowledge of a violation or potential violation of this policy must be reported directly to the Director of Compliance/Compliance Officer, the Compliance Hotline, or the Human Resources Department.

The Director of Compliance/Compliance Officer, or designee, will be responsible for the investigation and follow-up of any reported retaliation against an employee. The Director of Compliance/Compliance Officer will report the results of an investigation into suspected retaliation to the Compliance

Operations Committee. Any complaints involving retaliation by the Gundersen Vice President, Compliance, Director of Compliance/Compliance Officer, or by personnel who report to the Compliance Officer, shall be investigated by the Gundersen General Counsel, and/or Gundersen Boscobel's Chief Executive Officer.

Disciplinary action resulting from investigations conducted under this policy will be determined in consultation with Gundersen Boscobel and/or Gundersen's Human Resources, as applicable. Any employee who commits or condones any form of retaliation will be subject to discipline up to, and including, termination of employment.