



Applies To:	Employees, Service Partners, Board Members, Vendors
Topic	Whistleblower Policy (False Claims Act)
Distribution Date	April 2010
Revised:	Sept 2011, Nov 2013, Dec 2015

Background-Under Federal law, Inspire employees, service partners, Board members and vendors with whom Inspire does business may bring a civil action in the name of the government for a violation of the False Claims Act. The FCA provides protection of the reporter called the “Whistleblower’s Act.”

Definition: Whistleblowing is defined as the disclosure by a person to those in authority of mismanagement, corruption, illegality, or wrongdoing by others in the organization. The person who makes the disclosure is called the whistleblower.

Qui Tam Relator- A whistleblower that brings civil action in the name of the government for a violation of the False Claims Act

Procedure: Employees, Service Partners, Board Members and Vendors must report any actual or suspected non-compliance or wrong doing to their supervisor and to Inspire’s Compliance Officer. The above persons can bring civil action by the Government to the agency for False Claim Violations. If the Government is successful at proving False Claim Violations, the Whistleblower (Qui Tam Relator) may share in the percentage of the proceeds from the False Claim Action or settlement if the government investigation finds proof of False Claim actions and the violation results in a monetary settlement. Whistleblowers who are, or have been, involved in the falsifying of information or fraudulent activity, are not protected under this act.

Policy:

1. All Employees, Service Partners, Board Members or Vendors are responsible for reporting misconduct, including actual or potential violations of law, regulation, policies and procedures or the Code of Conduct.
2. An “open door” reporting system is maintained at all levels of management to encourage employees to report problems and concerns.
1. Employees, Service Partners, Board Members or vendors are encouraged to communicate with the Compliance Officer and/or Human Resource Director. There is no chain of command that must be followed to report areas of non-compliance.
2. Employees, Service Partners, Board Members or vendors may wish to remain anonymous when filing a report. This can be achieved by using the employee hotline (845-294-8806 x 301) and leaving a detailed message. The employee may also complete a “Non Compliance Issues Report” located on both the intranet and the network, and forward to the Compliance Officer.
3. The employee, Board member, vendor or service partner may choose to report the false claims or fraudulent act to the government.
4. If the employee, Board member, service partner or vendor brings actions against Inspire that has no basis in law or fact, or is for harassment, the employee, Board member, or service partner bringing the lawsuit may have to pay Inspire’s cost and fees.

Non-Retaliation

1. It is strictly prohibited to retaliate in any form against any employee who in good faith reports a perceived problem or concern. See Non-Retaliation/Non-Intimidation policy
2. Any employee who commits or condones any form of retaliation will be subject to disciplinary actions up to and including dismissal.

Related Policy:

False Claims Act

Non-Intimidation/Non-Retaliation Policy