

SELFHHELP COMMUNITY SERVICES, INC.		Policy #: 13 Page 1 of 3
CORPORATE COMPLIANCE POLICY AND PROCEDURE MANUAL		
Subject: Whistleblowers	Effective Date January 2007	Revision Date 11/ 2013, 8/2014 3/2018, 1/2022, 8/2023
Section: Corporate Compliance		

POLICY:

Selfhelp Community Services Inc. (“Selfhelp”) complies with the requirements of the Deficit Reduction Act (DRA) of 2005, the Patient Protection and Affordable Care Act, and the New York State Non-Profit Revitalization Act of 2013 to implement and enforce policies and procedures to detect and prevent fraud, waste and abuse with respect to payments from federal or state healthcare programs and to provide protections for those who report actual or suspected wrongdoing in good faith.

This policy applies to all current and former personnel, including board members, employees, senior administrators, executive staff, managers, contractors, subcontractors, consultants, independent contractors, volunteers and other agents of Selfhelp (“Selfhelp personnel”) and shall be distributed to all current and new Selfhelp Personnel.

PROCEDURE:

1. Selfhelp prohibits the knowing submission of false claims or completion of false documentation of client services.
2. All Selfhelp personnel are expected to act in accordance with federal, state, and local laws, contractual requirements and with the organizational policies.
3. To assist Selfhelp in meeting its legal and ethical obligations, all Selfhelp personnel who reasonably suspect, or are aware of, the preparation and submission of a false claim or report, any action taken by Selfhelp that is illegal or in violation of any law or corporate policy, or of any other potential fraud, waste or abuse (“Reportable Actions”) are required to report such information to his/her manager or supervisor or to the Compliance Officer or the Chair of the Audit Committee of the Board of Directors as soon as reasonably possible
4. Reports to the Compliance Officer can be made directly by phone (212-971-7610) or anonymously through the **Corporate Compliance Hotline at 646-616-7480.**

5. Reports to the Chair of Audit Committee of the Board of Directors can be made directly or anonymously through the **Chair's Corporate Compliance Hotline at 212-971-7781**.
6. Selfhelp will investigate any actual or suspected Reportable Actions swiftly and thoroughly through its compliance program.
7. The Compliance Officer is expected to begin an investigation of the reported allegation within 3 business days of the receipt of the report.
8. No Selfhelp personnel who make a good faith report of a Reportable Action, suspected violation of the Code of Conduct, compliance policies, State or Federal laws, rules, regulations, executive orders or judicial or administrative orders or rulings, that the employer's activity or policy poses a substantial and specific danger to public health or safety, or who cooperate in an investigation of an alleged violation, will suffer any retaliation or reprisal (as defined below) for making the report or cooperating in an investigation.
9. Selfhelp personnel can object to, or refuse to participate in any such activity, policy, or practice that the employee reasonably believes violates the law or poses a substantial and specific danger to public health or safety.
10. Selfhelp will also protect from Retaliation or Reprisal any Selfhelp Personnel who refuse to violate the law, or who makes public or private whistleblower disclosures.
11. Retaliation or Reprisal can take the form of one or more of the following:
 - a. Harassment
 - b. Discrimination
 - c. Firing or layoff
 - d. Blacklisting
 - e. Demotion
 - f. Denial of overtime pay or promotion
 - g. Discipline
 - h. Denial of benefits
 - i. Failure to hire or rehire
 - j. Intimidation, whether overt or covert
 - k. Threats
 - l. Reassignment with a negative impact on possibility of promotion
 - m. Pay reduction
 - n. Decrease in hours
 - o. Adversely affecting a former employee's current or prospective employment
 - p. Reporting to a government body regarding the suspected citizenship or immigration status of an employee or employee's household or family members

12. Selfhelp expects that any Selfhelp personnel who suspect that other Selfhelp personnel have violated the Code of Conduct, compliance policies, or any other policies, procedures, or applicable State or Federal law, will immediately report the suspicion to a Manager, Supervisor, the Compliance Officer, the Chair of the Audit Committee, or the Board of Directors.
13. Selfhelp staff receive Corporate Compliance Education and Training on the following:
 - a) the Federal False Claims Act
 - b) the New York State False Claims Act
 - c) the Patient Protection and Affordable Care Act
 - d) the specific statutory and regulatory provisions named in section 1902(a)(68)(A) of the Social Security Act
 - e) any other applicable state civil or criminal laws and state and federal whistleblower protections
 - f) information regarding the Selfhelp's policies and procedures for detecting and preventing waste, fraud and abuse