

<b>Policy Title:</b>	Whistleblower Protection	<b>Adopted Date:</b>	03-31-11
<b>Policy Category:</b>	Operational	<b>Review Date:</b>	
<b>Policy Number:</b>		<b>Amended Date:</b>	

## **Healthcare Financial Management Association**

### **Whistleblower Protection Policy**

As the nation's leading membership organization for healthcare financial management executives, HFMA prides itself on its adherence to federal, state, and local laws and/or regulations, including business ethics policies. HFMA has adopted a Code of Ethics, which requires each member of HFMA to promote the highest standards of professional conduct by practicing honesty and maintaining personal integrity. In furtherance of these principles, HFMA has adopted a whistleblower protection policy. Pursuant to this policy, as applicable to HFMA itself, any employee or member who becomes aware of any violation of federal, state, or local law or regulation, including any financial wrongdoing, should immediately report the violation to the President to allow the organization to investigate and, if applicable, correct the situation or condition.

If the President is involved or is believed to be involved in the matter being reported, employees or members may, in the alternative, make a report to the Chair of the Board of Directors. HFMA will conduct an investigation and take appropriate action within a reasonable period of time. Such complaints will be held in confidence to the extent the needs of the investigation permit.

If the violation of federal, state, or local law or regulation, or financial wrongdoing, concerns an HFMA chapter, the member (or the chapter employee, if applicable), should report the violation to the Chapter President. If the Chapter President is involved or is believed to be involved in the matter being reported, the violation should be reported to HFMA's President.

"Financial wrongdoing" may include, but is not limited to:

- questionable accounting practices;
- fraud or deliberate error in financial statements or recordkeeping;
- deficiencies of internal accounting controls;
- misrepresentations to company officers or accounting personnel.

If any member or employee reports in good faith what the member or employee believes to be a violation of the law and/or financial wrongdoing to an HFMA chapter or HFMA, its legal counsel, or to a federal, state, or local agency or assists in an investigation concerning financial wrongdoing, it is HFMA's policy that there will be no retaliation taken against the member or employee.

Members and employees are reminded of the importance of keeping financial matters confidential.

Members and employees with questions concerning the confidentiality or appropriateness of disclosure of particular information should contact the Chapter President or HFMA National Secretary/Treasurer as identified in the HFMA National website.