

**Office of Compliance Programs**

**PRIVACY POLICY AND PROCEDURES**

LSU Health Sciences Center New Orleans

Date Effective: April 14, 2003

**Patient Information Policy**

Whistleblower/Non-Retaliation

Policy #: 2100.5

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**SCOPE:**

All Louisiana State University (LSU) System health care facilities and providers including, but not limited to, hospitals physician practices, clinics, schools, etc. on the LSU Health Sciences Center New Orleans Academic Campus.

**Nota Bene:** All LSU System health care facilities and providers including, but not limited to hospitals, physician clinics, schools, etc. on the LSU Health Sciences Center New Orleans Academic Campus, are referred to in this policy as LSUHSC-NO.

**PURPOSE:**

To provide guidance to LSUHSC-NO health care facilities regarding the reporting of unlawful or unethical conduct and ensuring non-retaliation against workforce members.

**POLICY:**

The LSUHSC-NO facility holds its workforce members responsible for reporting any activities to authorities appropriate when, in good faith, they believe that the LSUHSC-NO facility has engaged in conduct that violates criminal or civil law, professional or clinical standards, or internal policies and procedures, including Permanent Memoranda and Chancellors' Memoranda. The LSUHSC-NO facility 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.

**PROCEDURE:**

- 1.0 It is the responsibility of all LSUHSC-NO facility 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 Chancellors' Memoranda.
- 2.0 The LSUHSC-NO facility will maintain an "open-door policy" at all levels of management to encourage employees to report problems and concerns.
- 3.0 The LSUHSC-NO facility will follow all necessary procedures to protect against any retaliation toward any employee, faculty, staff, or other individual, including a patient of its facilities, for exercising their rights or participating in any process pursuant to internal policies, applicable law, or regulation.

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- 4.0 Any employee who commits or condones any form of retaliation will be subject to the LSUHSC-NO facility Human Resources' policies on discipline up to, and including, termination.
- 5.0 The LSUHSC-NO facility will not retaliate against workforce members, individuals, or others for:
- Exercising any right under, or participating in any process established by federal, state, or local, law, regulations, or policy;
  - Filing a complaint with LSUHSC-NO facility or the agencies of the Department of Health and Human Services or any other regulatory agency or legal authority;
  - Testifying, assisting, or participating in an investigation, compliance review, proceeding, or hearing; or
  - 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.
- 6.0 The LSUHSC-NO facility Compliance Officer will investigate all allegations of non-compliance with LSUHSC-NO practices.