**990 Whistleblower**

**Purpose**

This Whistleblower Policy of the Association of Healthcare Value Analysis (AHVAP) encourages staff and volunteers to come forward with credible information on illegal practices or serious violations of adopted AHVAP policies. The policy provides for retaliation protection and information on how to report.

1. Encouragement of reporting.
   1. AHVAP encourages complaints, reports or inquiries about illegal practices or serious violations of AHVAP’s policies, including illegal or improper conduct by AHVAP itself, by its leadership, or by others on its behalf.
   2. Appropriate subjects to raise under this policy would include:
      * Financial improprieties,
      * Accounting or audit matters,
      * Ethical violations, or
      * Other similar illegal or improper practices or policies.
   3. Other subjects on which AHVAP has existing complaint mechanisms should be addressed under those mechanisms, such as raising matters of alleged discrimination or harassment via AHVAP’s Board of Directors or management firm channels, unless those channels are themselves implicated in the wrongdoing.
   4. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.
2. Protection from retaliation.
   1. AHVAP prohibits retaliation by or on behalf of AHVAP against staff or volunteers for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy.
   2. This protection extends to those whose allegations are made in good faith but prove to be mistaken.
   3. AHVAP reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries or who otherwise abuse this policy.
3. Where to report.
   1. Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the basis for the complaints, reports or inquiries.
   2. Complaints may be directed to AHVAP’s President or President-Elect of the Board of Directors; if both of those persons are implicated in the complaint, report or inquiry, it should be directed to the next line officer.
      * Complaints may be also be made via AHVAP’s general contact information:
        + Email: [info@ahvap.org](mailto:info@ahvap.org)
        + Phone: 518-306-1412
4. Investigation:
   1. AHVAP will conduct a prompt, discreet, and objective review or investigation. Staff or volunteers must recognize that AHVAP may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.

02/2022\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (MM/YYYY)

Revision/Review Approval Date

10/2016 (MM/YYYY)

Date approved by AHVAP Board of Directors