

South Florida VA Foundation for
Research & Education
Miami, Florida

SFVAFRE MEMORANDUM
No.....001

October 6, 2009

WHISTLEBLOWER

I. PURPOSE:

This Whistleblower Policy of South Florida Veterans Affairs Foundation for Research and Education, Inc. ("Organization"): (1) encourages staff and volunteers to come forward with credible information on illegal practices or serious violations of adopted policies of the Organization; (2) specifies that the Organization will protect the person from retaliation; and (3) identifies where such information can be reported.

II. POLICY:

General

Our *Standards of Ethical Conduct* ("Code") requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the South Florida Veterans Affairs Foundation for Research and Education ("Organization"), we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. It is the responsibility of all directors, officers and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

1. *Encouragement of reporting.* The Organization encourages complaints, reports or Inquiries about illegal practices or serious violations of the Organization's policies, Code, including illegal or improper conduct by the Organization itself, by its leadership, or by others on its behalf. Appropriate subjects to rise under this policy would include financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices or policies. Other subjects on whom the Organization has existing complaint mechanisms should be addressed under those mechanisms, such as raising matters of alleged discrimination or harassment via the Organization's human resources channels, unless those channels are themselves implicated in the wrongdoing. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.
2. *Protection from retaliation.* The Organization prohibits retaliation by or on behalf of the Organization 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. This protection extends to those whose allegations are made in good faith but prove to be mistaken. The Organization 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.* 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 bases for the complaints, reports or inquiries. They should be directed to the Organization's chief employed executive or Chairman of the Board of Directors; if both of those persons are implicated in the complaint, report or inquiry, it should be directed to the Research Integrity Officer as designated by the Medical Center Director. The Organization will conduct a prompt, discreet, and objective review or investigation. Staff or volunteers must recognize that the Organization may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.

III. REFERENCES:

Whistleblower Protection Act of 1989 and Public Law 101-12

IV. RESCISSION:

None

V. RESPONSIBILITY

Executive Director, SFVAFRE

VI. This Policy Memorandum will remain in effect until rescinded.



Luis Gonzalez, MHA
Acting Executive Director

The following concurred with this Medical Center Policy Memorandum:

President of the Board of Directors
Board of Director