



Subject:	Non-Intimidation and Non-Retaliation
Endorsed By:	Compliance Committee
Approved By:	Compliance Committee, Board of Managers
DSRIP Implementation Deadline:	April 2015
Effective Date:	October 2015
Supersedes:	April 2015
Purpose:	To establish a policy for Staten Island Performing Provider System, LLC (“SI-PPS”) that prohibits intimidation of and/or retaliation against anyone who participates in good faith in SI-PPS’ Compliance Program.
Policy:	It is the policy of SI-PPS to prohibit intimidation of and/or retaliation against any individual who participates in good faith in SI-PPS’ Compliance Program. Good faith participation in the Compliance Program includes, but is not limited to, reporting potential issues, investigating issues, self-evaluations, audits and remedial actions, and reporting to appropriate officials as provided in sections seven hundred forty (740) and seven hundred forty-one (741) of the New York Labor Law.
Procedure:	1. Any individual who believes that he or she has been subject to intimidation and/or retaliation for good faith participation in SI-PPS’ Compliance Program must immediately report such intimidation and/or retaliation to the SI-PPS Compliance Officer, either in person, via the Help Line at 855-233-3138, visiting statenislandperformingprovidersystem.ethicspoint.com or by calling the Compliance Office at 917-830-1161.

	<p>2. All reports of intimidation and/or retaliation relating to good faith participation in SI-PPS' Compliance Program will be investigated by the SI-PPS Compliance Officer or his/her designee. Upon conclusion of the investigation, the SI-PPS Compliance Officer will make a report and recommendation for discipline, where appropriate, to the Board of Managers or designated Board Committee. The SI-PPS Compliance Officer and the Board of Managers/designated Committee may confer and agree upon the discipline to be imposed.</p> <p>3. The possible sanctions that may be imposed on any individual who is found to have intimidated and/or retaliated against another individual include, but are not limited to, termination of employment, termination of contractual relationship, and exclusion from SI-PPS and/or the DSRIP program.</p>
Scope:	PPS Associates (PPS Associates shall mean all individuals and entities that participate in or do business with SI-PPS, including but not limited to its employees, independent contractors, vendors, agents, suppliers, executives and governing body members).
Project(s):	
Regulatory Alignment:	New York Social Services Law §363-d subd. 2 and 18 NYCRR §521.3(c), Sections seven hundred forty (740) and seven hundred forty-one (741) of the New York Labor Law.
Reference(s):	
Attachment(s):	none

Reviewed/Revised by Regina Bergren – April 2016

Approved by Compliance Committee: August 2016

Partner Organization	Responsible Staff Name & Title	Date Reviewed	Signature

