



Whistleblower Policy

Purpose

It is the intent of RCIL and LIFE (also referred to as the Agency) to adhere to all laws and regulations that apply to the Agency and the underlying purpose of this policy is to support the Agency's goal of legal compliance. The support of all employees is necessary to achieving compliance with various laws and regulations.

Policy

In accordance with federal, state and local laws, the Agency has established a compliance reporting process and a non-intimidation/non-retaliation policy to protect Affected Individuals who report problems and concerns. Any form of retaliation or retribution is strictly prohibited.

For purposes of this policy, the "Affected Individuals" includes all employees, volunteers, interns, vendors, contractors, Board Members, and service recipients.

The support of all Affected Individuals is necessary to achieving compliance with various laws and regulations.

An Affected Individual is protected from retaliation only if the Affected Individual brings the alleged unlawful activity, policy, or practice to the attention of the Agency and provides a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to the Affected Individuals that comply with this requirement. The Agency will not retaliate against an Affected Individual who, in good faith, has raised a complaint against some practice of the Agency, or of another individual or entity with whom the Agency has a business relationship.

All Affected Individuals have a responsibility to report any known or suspected misconduct, including actual or potential violations of laws, regulations, policies, procedures, the Agency's Corporate Compliance Plan, and/or Standards of Conduct to their direct Supervisor immediately, or to the Chief Corporate Compliance Officer, Executive Vice President of Corporate Resources, Chief Executive Officer or the President of the Board of Directors.

At any time, anyone may report compliance concerns to the Compliance Hotline by telephone at (315) 272-2905 (if you wish to remain anonymous enter *67 before calling the hotline number), Email – compliance@rcil.com or by mail at: Resource Center for Independent Living, 131 Genesee St., PO Box 210, Utica, NY 13502 Attention: Chief Corporate Compliance Officer.

Confidentiality will be maintained to the extent that is practical and allowable by law. RCIL is legally required to report crimes or potential crimes and infractions to external governmental agencies and identification of fraud, waste or abuse to the appropriate State or Federal entities.

Any form of intimidation or retaliation may result in disciplinary action up to and including termination.

If the reporter believes, in good faith, that retaliation for reporting a compliance complaint or for participating in an investigation has occurred, the person must immediately report the retaliation to the Chief Corporate Compliance Officer at 315-738-2735 or compliance@rcil.com.

The Chief Corporate Compliance Officer or designee will investigate all allegations of retaliation and results will be reported to the Chief Executive Officer and Executive Vice President of Corporate Resources.

Affected Individuals are required to participate in the Compliance Program including but not limited to reporting potential or actual compliance concerns, investigating or participating in an investigation, self-evaluations, audits, remedial actions and reporting to the appropriate officials.

Employees are not exempt from consequences of their own misconduct by reporting issues, although self-reporting will be taken into account in determining the appropriate course of action.

The Chief Executive Officer or designee will investigate any report that the Compliance Officer is engaging in intimidation or retaliation.

Regulatory Reference:

Social Service Law 363-D
18 NYCRR Part 521
New York Labor Law §740 and §741