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Applicability	Providence Systemwide + PGC
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PSJH-CPP-STA Nonretaliation Standard

Scope:

This standard applies to Providence and its Affiliates[i] (collectively known as "Providence") and its workforce (caregivers, volunteers, trainees, interns, apprentice, students), independent contractors, vendors and all other individuals working at the ministry, whether they are paid by or under the direct control of the facility); employees of affiliated organizations (collectively, "workforce members").

☑ Yes ☐ No Is this standard applicable to Providence Global Center (PGC) caregivers?

This is a management level standard reviewed and recommended by the standard Advisory Committee (PAC) to consider for approval by senior leadership which includes vetting by Executive Council with final approval by the President, Chief Executive Officer or appropriate delegate.

Purpose:

To establish a standard that protects workforce members from retaliation or harassment for having raised concerns about actual or potential wrongdoing or misconduct.

Definitions:

1. ***Retaliation:*** Any adverse action taken against a workforce member because the workforce member has, in good faith, reported wrongdoing or has, in good faith, cooperated in/with an investigation. Adverse actions may include actions such as scheduling changes, physical relocation, adverse evaluations, paid administrative leave, and termination. Retaliation is prohibited by law.
2. ***Workforce member*** is defined as all employees, volunteers, trainees, independent contractors, vendors, and other persons under direct control of a Providence entity, whether they are paid by Providence.
3. ***Wrongdoing*** may include, but is not limited to:
   - Illegal or fraudulent activity.
   - Financial misstatements, or accounting or auditing irregularities.
   - Conflicts of interests, or dishonest or unethical conduct.
   - Violations of the Code of Conduct.
   - Violations of applicable laws, rules, regulations, and/or policies.
4. ***Compliance Program*** is fully described in the Board approved Providence Compliance Program Description and includes the Codes of Conduct and a number of integrity and compliance policies for our family of organizations.

Standard:

Workforce members have a responsibility and duty to promptly report concerns about actual or potential wrongdoing – including violations of Providence's Compliance Program – through proper channels and are not permitted to overlook such actual or potential wrong-doing. Providence prohibits retaliation against any workforce member for making a good-faith report of their concerns about actual or potential wrong-doing – including violations of the Providence Compliance Program. Retaliation is also prohibited against any workforce member who in good faith assists in the investigation of any reported concern. Any manager, supervisor, employee, or other workforce member who engages in retaliation or harassment is subject to discipline or other appropriate corrective action up to and including termination.

Requirements:

1. The responsibility to report and the commitment to an environment free from retaliation are communicated to workforce members through regular integrity and compliance education, their managers, and through the Providence Compliance Program.
2. Workforce members cannot exempt themselves from the consequences of wrong-doing or inadequate performance by reporting such wrong-doing or inadequate performance. However, the consequences of wrong-doing or inadequate performance may not, in any case, be more severe because a workforce member reported it on their own initiative.
3. A workforce member may file reports of incidents of retaliation or suspected retaliation either by identifying themself or anonymously. Good faith reports of retaliation or

suspected retaliation will be kept confidential to the extent possible, consistent with the need to conduct an appropriate investigation.

4. Any concerns regarding potential retaliation should be reported to the Divisional Compliance Office, Risk Department or Human Resources for investigation and resolution.

Document Linkage:

Applicable Policies: (with Supporting Standards if applicable)	**PSJH-CPP-POL Compliance Program Policy** **PSJH-CPP-STA Code of Conduct Policy** **PSJH-CPP-POL Disclosure Program and Duty to Report Policy** • PSJH-CPP-STA Investigations Standard • PSJH-CPP-STA Nonretaliation Standard • PSJH-CPP-STA Compliance Reporting Obligations Standard **PSJH-CPP-POL General Privacy Policy** • PSJH-CPP-STA Privacy Sanctions Standard **PSJH-CPP-737 Reporting and Investigating Potential Compliance Issues & Reportable Compliance Events Policy** (WA & AK hospitals) **PSJH-CLIN-1208 Reportable Quality Event Policy** **PSJH-CLIN-1212 Event Reporting and Response Policy and Procedure** **Policies and Standards on the Caregiver Service Portal:** • Confidentiality Policy • Counseling and Corrective Action Policy • Harassment, Discrimination, Retaliation Policy • Standards of Conduct Policy Work Incident Reporting and Investigation Policy
Associated Standards: (with Supporting Documents if applicable)	None
Other Supporting Documents:	Compliance Program Overview Compliance Program Description

References:

Guidance from the Office of the Inspector General (OIG): At a minimum, comprehensive compliance programs should include the following: ...The adoption of procedures to protect the anonymity of complainants and to protect whistleblowers from retaliation.

63 FR 35, p. 8989 Deficit Reduction Act: Public Law 109-71
False Claims Act: 31 U.S.C. §§ 3729-3733
https://oig.justice.gov/hotline/whistleblower-protection
Federal Sentencing Guidelines - Ethics and Compliance Program Elements
Office of Inspector General (OIG) General Compliance Program Guidance (GCPG)
Medicare Advantage Industry Segment-Specific Compliance Program Guidance (MA-ICPG)
Department of Justice (DOJ) Evaluation of Corporate Compliance Programs (2024)G)

Applicability:

[i]For purposes of this standard, "Affiliates" is defined as any not-for-profit or non-profit entity that is wholly owned or controlled by Providence St. Joseph Health (PSJH), Providence Health & Services, St. Joseph Health System, Western HealthConnect, Kadlec, Covenant Health Network, Grace Health System, Providence Global Center*, NorCal HealthConnect, or is a not-for-profit or non-profit entity majority owned or controlled by PSJH or its Affiliates and bears the Providence, Swedish Health Services, St. Joseph Health, Covenant Health, Grace Health System, Kadlec, or Pacific Medical Centers names (includes Medical Groups, Home and Community Care, etc.).
*Policies and/or procedures may vary for our international affiliates due to regulatory differences.

Approval Signatures

Step Description	Approver	Date
Document Management Office	Naomi Margolis: Senior Compliance Specialist	11/2026

Applicability

AK - Credena Health, AK - Providence Alaska MC, AK - Providence Kodiak Island MC, AK - Providence Medical Group, AK - Providence Seward MC, AK - Providence St. Elias Specialty Hospital, AK - Providence Valdez MC, CA - Credena Health, CA - Healdsburg Hospital, CA - Petaluma Valley Hospital, CA - Physician Enterprise Northern, CA - Physician Enterprise Southern, CA - Providence Cedars-Sinai Tarzana MC, CA - Providence Holy Cross MC, CA - Providence LCM MC San Pedro, CA - Providence LCM MC Torrance, CA - Providence Mission Hospitals, CA - Providence Queen of the Valley Medical Center, CA - Providence Redwood Memorial Hospital, CA - Providence Saint John's Health Center, CA - Providence Saint Joseph MC, Burbank, CA - Providence Santa Rosa Memorial Hospital, CA - Providence St. Joseph Hospital - Eureka, CA - Providence St. Joseph Hospital Orange, CA - Providence St. Jude Medical Center, CA - Providence St. Mary Medical Ctr Apple Valley, MT - Credena Health, MT - Providence St. Joseph MC, Polson, MT - St. Patrick Hospital, NM - Covenant Hobbs Hospital, OR - Credena Health, OR - Providence Ctr for Medically Fragile Children, OR - Providence Health Oregon Labs, OR - Providence Hood River

Memorial Hospital, OR - Providence Medford MC, OR - Providence Medical Group, OR - Providence Milwaukie Hospital, OR - Providence Newberg MC, OR - Providence Portland MC, OR - Providence Seaside Hospital, OR - Providence St. Vincent MC, OR - Providence Willamette Falls MC, PACE, PHCC - Home & Community Care, PHCC - Home Health, PHCC - Home Medical Equipment, PHCC - Hospice, PHCC - Infusion/Pharmacy, PHCC - Palliative Care, Providence, Providence Express Care, Providence Global Center, Providence Physician Enterprise, Providence Traditional Health Workers, TX - Covenant Children's Hospital, TX - Covenant Health - ACO, TX - Covenant Health Partners, TX - Covenant Hospital Levelland, TX - Covenant Hospital Plainview, TX - Covenant Medical Center, TX - Covenant Medical Group, TX - Covenant Specialty Hospital, TX - Grace Clinic, TX - Grace Surgical Hospital, WA - Credena Health, WA - EWA Providence Medical Group, WA - Kadlec Regional Medical Center, WA - NWR Providence Medical Group, WA - PacMed, WA - Providence Centralia Hospital, WA - Providence DominiCare, WA - Providence Holy Family Hospital, WA - Providence Mt. Carmel Hospital, WA - Providence Regional MC Everett, WA - Providence Sacred Heart Med Ctr & Children's, WA - Providence St. Joseph's Hospital, WA - Providence St. Luke's Rehabilitation Medical, WA - Providence St. Mary MC, WA - Providence St. Peter Hospital, WA - SWR Providence Medical Group, WA - Skilled Nursing / AL, WA - Swedish Medical Center, WA - Swedish Medical Group, WA - USFHP

Standards

No standards are associated with this document