

**BURRELL COLLEGE
OF OSTEOPATHIC MEDICINE
POLICY MANUAL**

SECTION: General Administration & Leadership

BCOM Policy B2041

TOPIC: Whistleblower

Approval Date: 8/23/19

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Approved: Signature on File

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POLICY

BCOM intends to create a safe environment that encourages and enables employees and students to report violations or suspected violations within the organization without fear of retaliation or discrimination.

No employee or student who, in good faith, reports actual or suspected fraud, misconduct, dishonesty, or other illegal practice shall suffer any form of retaliation including harassment or adverse employment/enrollment consequences (including demotion or discharge).

RESPONSIBLE OFFICIAL(S):

Compliance Officer, Office of Human Resources, Office of Student Affairs

PROCEDURES

1. Employees or students who have a concern relating to actual or suspected fraud, misconduct, dishonesty, or other illegal practice have a responsibility to report suspected violations.
2. BCOM offers a 24-hour fraud hotline allowing for anonymous, confidential complaints through an independent, third party. Please see <https://fraudhl.com/submit-a-report> or call 1-855-FRAUD-HL using company ID "BCOMNM". Complainants may also follow the established policies and/or procedures for Title IX, Grievances, Accreditation Standard Complaint and Fraud Reporting.
3. All reporting will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. All reports will be promptly investigated.
4. Any person reporting actual or suspected fraud, misconduct, dishonesty, or other illegal practice must be acting in good faith and have reasonable grounds for believing the information disclosed indicates fraud, misconduct, dishonesty, or other illegal practice.
5. Any allegations that prove to be unsubstantiated and/or prove to have been made maliciously or are knowingly false will be viewed as a serious disciplinary and/or lawful offense and will be referred to the Office of Human Resources or the Office of Student Affairs.
6. Any reports of retaliatory behavior against a complainant will be investigated by the Office of Human Resources or the Office of Student Affairs. Retaliatory behavior could result in disciplinary action for the retaliator.

CROSS-REFERENCE

BCOM Grievance Policy B2040: <https://www.bcomnm.org/policy-b2040/>

BCOM Title IX Policy B1043: <https://www.bcomnm.org/policy-b1043/>

BCOM Accreditation Standard Complaint Policy B2030: <https://bcomnm.org/policy-b2030/>

BCOM SOP FIN.011.01 Fraud Awareness and Reporting: <https://bcomnm.org/sop/>