

Purpose:

The Pennsylvania Trauma Systems Foundation (PTSF) is committed to the highest standards of legal and ethical conduct in all its operations. This policy applies to entities seeking accreditation, or which have obtained accreditation, including their agents and employees (“Hospitals”). It also applies to PTSF Board of Directors (“BOD”).

1. PTSF will not discriminate in accreditation decisions against Hospitals or BOD solely because they:
 - A. Make a charge, testify, assist, or participate in an investigation, proceeding, or hearing about any matter that they reasonably believe is unlawful;
 - B. Raise reasonable concerns, in good faith, about an operational violation of government health or safety rules or an otherwise significant threat to health or safety; or
 - C. Oppose a practice that they reasonably believe is unlawful under the Pennsylvania Whistleblowing Law.
2. PTSF will not deny accreditation to applicant entities or rescind accreditation from accredited trauma centers in retaliation for the above outlined conduct. PTSF will not otherwise take adverse action against an entity’s accredited status solely because the entity or its personnel engaged in good faith reporting of the above conduct, as defined in applicable state and federal law. For the avoidance of doubt, this protection extends only to the act of making such a report; it does not preclude PTSF from taking accreditation-related action based on the substance of information disclosed in or resulting from an investigation of any such report. Where information disclosed through protected reporting activity results in an investigation, PTSF will conduct such investigation in a fair and impartial manner consistent with its accreditation standards and applicable law.
3. PTSF will universally apply its accreditation standards, and may deny, rescind, or otherwise take unfavorable action against a hospital’s accredited status in accordance with those standards, including where warranted based on information that comes to PTSF’s attention through protected reporting activity.
4. PTSF will not take adverse action against a member's Board standing or participation solely because the member engaged in protected reporting activity as defined herein.

5. Nothing in this policy prohibits any individual from reporting suspected violations of law to appropriate governmental or regulatory agencies, including the Pennsylvania Office of Attorney General, the IRS, or any other applicable authority.
6. If reporting internally to PTSF, Hospitals and BOD are encouraged to use the below suggested contacts:

Reporting Channel	Contact / Method Contact information is located on the PTSF website: www.ptsf.org
PTSF President	Primary point of contact for concerns not involving the President
Board Chair	Used when the concern involves the President
Audit/Finance Committee	Preferred channel for financial concerns or suspected fraud
Written / Anonymous Report	Anonymous reports are accepted; however, the ability to fully investigate may be limited. PTSF will nonetheless make good faith efforts to address all anonymous reports to the extent practicable.

7. PTSF will make reasonable efforts to protect the confidentiality of any individual who submits a report under this policy, to the extent permitted by law and consistent with its obligation to conduct a thorough investigation. Confidentiality cannot be guaranteed where disclosure is required by law or is necessary to address the reported concern.
8. All reports submitted under this policy will be reviewed promptly and, where warranted, investigated in an objective and timely manner by an individual or body with appropriate authority and no direct conflict of interest in the matter. The individual submitting a report may be contacted for additional information as part of the review process.
9. Compliance with Applicable State and Federal Whistleblower Statutes: PTSF acknowledges the protections afforded under potentially applicable federal whistleblower law, including 41 U.S.C. § 4712 and 31 U.S.C. § 3730(h) and Pennsylvania's Whistleblower Law, including 43 P.S. §§ 1421-1428. Nothing in this policy is intended to limit any rights or protections available under applicable federal, state, or local laws. However, individuals seeking protection under such statutes must comply with all applicable procedural and substantive requirements of those laws, including but not limited to meeting applicable evidentiary standards and acting in good faith. PTSF reserves the right to assert all available legal defenses in any proceeding arising under state and federal law.

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Review Date:

Revise Date:

Amy Kempinski, MSN, RN, CEN, TCRN — President