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| Policy: Whistleblower and Retaliation Policy | Applicability: MMC Students, Employees, Board of Trustees, Volunteers, Contractors |
| Policy Owner: Office of General Counsel | Approved By: Office of the President |
| Effective Date: 11/20/2016 | Last Reviewed: October 24, 2024 |
| Next Review: October 24, 2025 | Contact: (615)327-6102 |

PURPOSE: Meharry Medical College (“MMC”) is committed to the highest standards of conduct and compliance with all applicable laws. The purpose of this policy is to encourage all members of the MMC community: students, employees, members of the Board of Trustees, volunteers and others acting on behalf of or providing services to MMC, to report, without fear of reprisal, any concerns relating to the College’s financial matters or violations of any law or College Policy.

POLICY: MMC encourages all members of the MMC community to report acts they in good faith perceive as being a violation of law and/or College policy, rules or requirements. This policy is intended to encourage the disclosure to the appropriate officials so that prompt and appropriate action can be taken.

MMC is committed to protecting individuals from interference in making a good faith report of violation under this policy and from retaliation as a result of such good faith reporting. Individuals may not retaliate against any other individual on the basis of that person’s good faith report of a violation. Individuals may not use or attempt to use authority or influence related to their College position or association to interfere with another individual’s right to make a report of violation as provided for in this policy.



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PROCEDURE:

I. Reporting Requirements

Members of the College community must notify the College with any concerns related to the College's financial matters or violations of the law or College policy. Examples include:

- Fraud, dishonesty, or deception regarding accounting, financial controls, financial reporting, audit, and other financial matters.
- Fraud, dishonesty, or deception regarding tax matters
- Unauthorized alteration or manipulation of personnel or College data
- Pursuit of personal financial gain at the College's expense
- Misappropriation or misuse of College resources
- Authorizing or receiving compensation for goods not received or services not performed
- Violations of law or regulation such as laws protecting minors or disabled persons
- Violation of College policies

Notification



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Notifications can be made to the Office of General Counsel (615.327.6102), the Office of Internal Audit (615.327.6390), or to the Chair of the College's Audit and Compliance Committee of the Board of Trustees.

Form of Notice

The notification should specify in reasonable detail the nature of the concern and the persons involved in and with knowledge of the financial matter or violation. A written notification would promote a clear understanding of the issues raised, but the notification could be made orally. It should be accompanied by any available supporting documentation. Notification may be made anonymously.

II. Acting in Good Faith

Anyone submitting a notification concerning the College's financial matters or violations of any law or College policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. A reporting person need not be certain that a violation has occurred. Any allegations that are made in bad faith will be viewed as a serious disciplinary offense and the reporter may be subject to disciplinary action and/or legal claim.



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The Office of General Counsel (or Internal Audit or Chair of Audit and Compliance Committee) will promptly investigate or delegate the investigating of reports of violations. All individuals involved are required to cooperate with such investigations. To the extent practical and appropriate, the identity of anyone who submits a notification or who participates in a resulting investigation will not be disclosed; however, confidentiality cannot be guaranteed. Depending on the nature of the reported violation or the results of the investigation, matters may be reported to the Office of the President, the Board of Trustee's Audit and Compliance Committee, or the full Board of Trustees.

Notifications about matters covered by College policies will be addressed in accordance with the procedures set forth in those policies.

III. No Retaliation

It is a serious violation of law (with possible criminal penalties) and of this policy to retaliate or threaten retaliation in any form against an individual who in good faith reports a concern about the College's financial matters or a suspected violation of College policy or law or who assists in the investigation of a reported violation.



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Examples of retaliation include:

- Termination
- Demotion
- Suspension
- Harassment
- Failure to consider for promotion or
- Any other negative action, made directly or indirectly against a reporting person.

Such acts will result in appropriate disciplinary action up to and including termination of employment. Anyone who experiences or has knowledge of such retaliatory actions should provide notice immediately pursuant to the procedures described above.