

**NEW VIEW ALLIANCE, INC.**  
**WHISTLEBLOWER POLICY**

**Purpose**

New View Alliance, Inc. is committed to high standards of ethical, moral, and legal conduct as well as fostering a culture of compliance. In line with this commitment, and New View Alliance, Inc.'s commitment to open communication, this policy aims to provide an avenue for directors, officers, key persons, employees, contractors and volunteers/interns to raise compliance concerns as well as to be reassured that they will be protected from harassing, discriminating, intimidating and/or other forms of retaliating responses.

New View Alliance, Inc.'s Whistleblower Policy is intended to protect from retaliation individuals who report suspected improper conduct. Thus, no director, officer, key person, employee, contractor or volunteer/intern of New View Alliance, Inc. who in good faith reports any action or suspected action taken by or within New View Alliance, Inc. that is illegal, fraudulent, or in violation of law (e.g. including, but not limited to the New York False Claims Act) or of any adopted policy of New View Alliance, Inc. shall suffer intimidation, harassment, discrimination or other retaliation or, in the case of employees, an adverse employment consequence. However, reports made in bad faith may result in disciplinary action up to and including termination.

For purposes of this policy, a key person shall have the meaning provided in New York Not-For-Profit Corporation Law Section 102(a)(25), which is the following:

Any person, other than a director or officer, whether or not an employee of the New View Alliance, Inc. who (i) has responsibilities, or exercises powers or influence over New View Alliance, Inc. as a whole similar to the responsibilities, powers, or influence of directors and officers; (ii) manages New View Alliance, Inc., or a segment of New View Alliance, Inc. that represents a substantial portion of the activities, assets, income or expenses of New View Alliance, Inc.; or (iii) alone or with others controls or determines a substantial portion of New View Alliance, Inc.'s capital expenditures or operating budget.

The Corporate Compliance Officer shall be notified immediately, in the manner specified in this policy, if any violations or suspected violations of laws or New View Alliance, Inc. policies shall occur.

**Administration of this Policy**

The Corporate Compliance Officer shall administer this Whistleblower Policy. The Corporate Compliance Officer shall also be required to report to the New View Alliance, Inc. Board of Directors or an authorized committee of the Board of Directors. However, directors of New View Alliance, Inc. who are employees of New View Alliance, Inc. may not participate in any board or committee deliberations or voting relating to administration of this Whistleblower Policy.

**Person who is the subject of a whistleblower complaint**

Any person who is the subject of a whistleblower complaint shall not be present at or participate in Board of Directors or a committee of the Board of Directors' deliberations or vote on matters relating to such complaint. Nonetheless, the Board of Directors or a committee of the Board of Directors may request that the person who is subject to the whistleblower complaint present information as background or answer questions at a committee or Board of Directors' meeting prior to the commencement of deliberations or a vote on the complaint.

*Confidentiality* – When reporting anonymously via the whistleblower hotline, as noted below, confidentiality can be assured while the confidentiality of all reports will be maintained according to New View Alliance, Inc.’s Investigation and Resolution of Compliance Concerns Policy, which states, in part, that in no event shall any communications/reports pertaining to any action or suspected action taken by or within New View Alliance, Inc. that is illegal, fraudulent or in violation of any adopted policy of New View Alliance, Inc. be shared with anyone who is not a part of the investigation relating to the communication/ report. Any person who is a part of the investigation shall only receive the portion of the communication/report that such individual needs to know in order to fulfill his/her obligations under the investigation. However, in all circumstances, such individuals shall be subject to a duty to uphold and maintain the confidentiality of the communication/report and all aspects of the investigation.

### **Process for Submitting a Whistleblower Report**

*Reporting* –may be made to the following:

- Corporate Compliance Officer, Pamela Rouse (783-3224;prouse@newviewalliance.org )
- Board of Directors Audit and Compliance Committee Chair, Tracy Meyer; 716-400-4529
- The Whistleblower Hotline:
  - By Phone: 877-472-2110
  - E-mail: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com)
  - Fax (215) 689-3885
  - By letter to: Lighthouse Services, Inc.  
1710 Walton Road, Suite 204, Blue Bell, PA 19422  
(You must include New View Alliance, Inc.’s name in letter)

### **How the Report of Concern Will be Handled**

Reports will be fully investigated by the Corporate Compliance Officer in consultation with the Board of Directors Audit and Compliance Committee and, as needed, with legal counsel, according to New View Alliance, Inc.’s Investigation and Resolution of Compliance Concerns Policy and, if warranted, appropriate corrective action measures will be established. If an investigation of a reported concern finds that monies are owed to a funding source, repayment will be made according to the New York State Office of Medicaid Inspector General’s guidelines as well as any applicable oversight agency guidelines.

### **Distribution of this Policy**

A copy of this policy will be distributed during initial training and annually thereafter to all New View Alliance, Inc. directors, officers, key persons, employees, contractors, volunteers who provide substantial services to New View Alliance, Inc. and interns. This policy shall also be posted on New View Alliance, Inc.’s website.