Whistleblower Policy

I. PURPOSE: This Whistleblower Policy of the Palo Alto Veterans Institute for Research (PAVIR) ("Organization") (1) encourages employees to come forward with credible information on illegal practices or serious violations of adopted policies of the Organization; (2) specifies that the Organization will protect the person from retaliation; and (3) identifies where such information can be reported.

II. POLICY: The following policy pertains to whistleblower activity:

1. **Encouragement of reporting**. PAVIR encourages complaints, reports or inquiries about illegal practices or serious violations of the Organization's policies, including illegal or improper conduct by the Organization itself, by its leadership, or by others on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices or policies. Other subjects on which the Organization has existing complaint mechanisms should be addressed under those mechanisms, such as raising matters of alleged discrimination or harassment via the Organization's human resources channels, or matters of scientific misconduct via the VA's or Organization's research misconduct channels, unless those channels are themselves implicated in the wrongdoing. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.
2. **Protection from retaliation**. PAVIR prohibits retaliation by or on behalf of the Organization against employees for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. PAVIR reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries or who otherwise abuse this policy.

III. PROCEDURES:

Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the bases for the complaints, reports or inquiries. They should be directed to PAVIR's Chief Executive Officer or Chairman of the Board of Directors; if both of those persons are implicated in the complaint, report or inquiry, it should be directed to the VA Palo Alto Health Care System's Associate Chief of Staff for Research. A prompt, discreet, and objective review or investigation will be conducted. Employees must recognize that the Organization may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.