

# ACAHM Accreditation Commission for Acupuncture and Herbal Medicine

**Policy Title:** Whistleblower and Non-Retaliation Policy

**Approved By:** ACAHM Executive Committee

**Document History:** Implementation Date: 26 September 2017

Last Updated: 11 Jan 2024

**Related Commission Policies:** [Code of Conduct and Professional Ethics Guide](#)

**References:** 20 U.S. Code §1099b; 34 CFR §602; Sarbanes Oxley Act Section 1107

**Responsible Official:** ACAHM Director of Regulatory Affairs

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**Policy Summary:** This *Whistleblower Policy* is intended to encourage and enable employees and others to raise serious concerns internally so that ACAHM can address and correct inappropriate conduct and actions. It is the responsibility of all Commissioners, officers, employees, and volunteers to report concerns about violations of ACAHM's *Code of Conduct* and professional ethics expectations, or suspected violations of standards, policies, processes, and regulations that govern ACAHM's operations and responsibilities.

## Reporting Responsibility

The Accreditation Commission for Acupuncture and Herbal Medicine (ACAHM or Commission) requires Commissioners, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of ACAHM, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. (See also [Code of Conduct and Professional Ethics Guide](#)).

## No-Retaliation Policy

It is contrary to the values and policy of ACAHM for anyone to retaliate against any Commissioner, officer, employee, or volunteer who in good faith:

- A. Makes a complaint, or threatens to make a good faith complaint, regarding a suspected Organization or employee violation of the law, including discriminatory or other unfair employment practices.
- B. Makes a complaint, or threatens to make a good faith complaint, regarding accounting, internal accounting controls, or auditing matters that may lead to incorrect, or misrepresentations in, financial accounting.
- C. Makes a report, or threatens to make a good faith report, of a violation that endangers the health or safety of an employee, patient, client or customer, environment, or general public.
- D. Reports a concern about violations of ACAHM's *Code of Conduct* and professional ethics expectations.
- E. Reports a concern about suspected or actual violations of regulations that govern ACAHM's operations.
- F. Objects to or refuses to participate in, any activity, policy, or practice, which the employee reasonably believes is a violation of the law.

- G. Provides information to assist in an investigation regarding violations of the law; or
- H. Files, testifies, participates, or assists in a proceeding, action or hearing in relation to alleged violations of the law.

An employee who violates this No-Retaliation Policy is subject to discipline, up to and including termination of employment.

**Reporting Procedure**

ACAHM has an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with the Executive Director. It is the responsibility of the Executive Director to investigate all reported complaints.

If the issue directly involves the Executive Director than employees may submit a written report of the matter to the Commission Chair. Employees should also review their respective state and local agency responsible for investigating alleged violations.

The Executive Director will advise the Commission of all complaints, and their resolutions, and will report at least annually to the Chair and Treasurer on activities relating to accounting or alleged financial improprieties.

**Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosure indicates a violation. Any allegations that prove to be unsubstantiated, and which prove to have been maliciously or knowingly to be false, will be viewed as a serious disciplinary offense.

**Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of actual or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

**Handling of Reported Violations**

ACAHM’s Executive Director (or Chair of the Commission) will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be investigated promptly, and appropriate corrective action will be taken if warranted by the investigation.

**Revision History**

Date Revised	Summary of Revisions	Approved By
190817	Periodic Review Performed. No material revisions made.	ACAOM Executive Director
220204	Adjusted terminology throughout for ACAHM name change and removal of “Oriental” term; no material revisions made	ACAHM Executive Director
240111	Reviewed; no revisions	ACAHM Executive Director