



American Society of Acupuncturists
712 H Street, Suite 1189
Washington, D.C., 20002

Whistleblower Policy

1. Background

1.1. The American Society of Acupuncturists' (hereafter, ASA) Whistleblower Policy encourages and enables volunteers/employees to report what he or she in good faith believes to be a violation of federal or state law, the ASA's bylaws and policy, or questionable accounting. It prohibits retaliation against the volunteer/employee for reporting such violations. This policy provides ASA leadership with a framework for compliance with the Whistleblower's Protection Act.

2. Applicability

2.1. All ASA board, committee, and council members, as well as employees, consultants, and volunteers, are covered by the scope of this policy and its guidelines.

3. Compliance Officer

3.1. Concerns shall be directed to the Compliance Officer for investigation. The ASA Compliance Officer has full responsibility to investigate, and resolve complaints involving violations of the policies stated herein, and to recommend to the ASA Board of Directors (BOD) the imposition of appropriate sanctions against violators. If the violator in question is the Compliance Officer, concerns may be taken directly to the ASA Chair.

4. Description

4.1. Policy

4.1.1. It is the responsibility of all those noted in section 2.1 to comply with this whistleblower policy by reporting violations or suspected violations.

4.1.2. Reporting individuals should notify the Compliance Officer if an action needs to be taken in order for the ASA to be in compliance with law, policy, or generally accepted accounting practices.

4.2. Procedure

- 4.2.1. The ASA has an “open-door” policy and suggests that any volunteers/employees share their questions, concerns, suggestions or complaints with the ASA Compliance Officer.
- 4.2.2. A written complaint is required. Please be as specific as possible, including the name(s) of the individual(s) involved as well as any witnesses, and the date and location of the incident.

5. Additional Details

5.1. Good Faith

- 5.1.1. Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation.
- 5.1.2. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense. It may also result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including legal action.

5.2. Confidentiality

- 5.2.1. Violations or suspected violations may be submitted on a confidential basis by the reporting individual or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.
- 5.2.2. Disclosure of reports of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal or termination of employment. Such conduct may also give rise to other actions, including legal action.

5.3. No Retaliation

- 5.3.1. No volunteer/employee who, in good faith, reports a concern shall be subject to retaliation. Moreover, a volunteer/employee who retaliates



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against someone who has reported a concern in good faith is subject to discipline up to and including dismissal, termination of employment, and legal action.