

**Access to Independence of Cortland County, Inc.  
Whistleblower Policy and Procedure  
(Employee, Vendor, Volunteer, Board Member)**

To help ensure that Access to Independence of Cortland County, Inc. (the “Agency”) complies with the highest standards of financial reporting and lawful, ethical behavior, the Board of Directors established the following procedures for the reporting of illegal or unethical conduct in connection with the Agency’s finances or other aspects of its operations. The policy further indicates procedures for the retention and treatment of such complaints, including confidential, anonymous submissions received from employees.

Should any person know or have a reasonable belief that persons associated with the Agency plan to engage (or have engaged) in illegal or unethical conduct in connection with the finances or other aspect of the Agency’s operations, that person should immediately file a complaint with the Executive Director (“Complaint”). If the Complaint concerns the Executive Director, or the complainant is not comfortable reporting to the Executive Director, then the complainant should notify the Chair of the Personnel Committee instead. If a Complaint is reported to a Board Member, she or he will promptly report the Complaint to the Executive Director, unless that person is the subject of the Complaint.

*Employees of the Agency may submit Complaints on a confidential, anonymous basis. Issues arising under the Agency’s equal employment opportunity policy, including the policy against harassment, employee benefit policies and issues generally handled by individuals responsible for the Agency’s personnel practices and procedures are not covered by this Policy. Mechanisms for resolving such issues are addressed in the Agency’s Employee Handbook: Personnel Policies & Procedures.*

The Executive Director, or Personnel Committee Chair, will report all Complaints to the Executive Committee, prior to its next regularly scheduled meeting. In appropriate circumstances, the Executive Director or Personnel Committee Chair may report a Complaint to the Board President. Such reports will include a copy of the Complaint, its date, nature and source (unless the complainant is an employee who has requested confidentiality and/or anonymity), how it was communicated, whether the Executive Director or Personnel Committee Chair regards the Complaint as credible, and proposals to address it.

The Executive Committee will promptly follow up on all credible allegations, with further investigation conducted if needed to resolve disputed facts. The Complaint will not be shared with an individual who is the subject of the Complaint. In conducting its investigations, the Agency will respect an employee’s request for confidentiality and/or anonymity and will strive to keep the identity of other complainants as confidential as possible, consistent with the need to conduct an adequate review and investigation.

The Executive Committee will inform the Board if any Complaint is confirmed, or if the Executive Committee otherwise believes that the Board should be made aware of the situation. The Executive Committee will have ultimate authority over the treatment of any

Complaints reported to it, subject to the Board's oversight. The Executive Committee, or in the case of Complaints reported to the full Board, the Board, will ensure that records of all Complaints are maintained in accordance with the Agency's document retention policy.

The Agency will take appropriate action in response to any Complaints, including, but not limited to, disciplinary action (up to and including termination) against any person who, in the Agency's assessment, has engaged in misconduct. Such misconduct will be reported to the relevant civil or criminal authorities as required by law.

The Agency will not knowingly take any action to harm a person (retaliate) who reports a Complaint in good faith pursuant to this policy. Likewise, there will be no punishment or other retaliation for providing information regarding a Complaint in good faith to, or otherwise assisting in any investigation regarding a Complaint conducted by, the Agency, law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant. Finally, there will be no punishment or other retaliation for filing a Complaint in good faith, or otherwise participating or assisting in a proceeding filed or about to be filed (with any knowledge of the Agency) regarding any Complaint. An individual who deliberately or maliciously provides false information may be subject to disciplinary action (up to and including termination).

Should any person know or have a reasonable belief that persons associated with the Agency plan to engage (or have engaged) in illegal or unethical conduct in connection with the finances or other aspect of the Agency's operations, that person should immediately file a complaint with the Chief Executive Officer ("Complaint").

Access to Independence of Cortland County, Inc.  
Chad W. Underwood, Chief Executive Officer  
26 N. Main Street  
Cortland, New York 13045  
Phone: (607) 753-7363  
Fax: (607) 756-4884  
Email: [cwunderwood@aticortland.org](mailto:cwunderwood@aticortland.org)

In the event you are unsatisfied with the response, or in the event the Chief Executive Officer is unable to respond within ten business days, you may file a complaint, grievance or appeal to the ATI Board of Director's Executive Committee, who will respond to your complaint, grievance or appeal within ten business days.

Access to Independence of Cortland County, Inc.  
Dr. Judy Bentley, Board Chair  
26 N. Main Street  
Cortland, New York 13045  
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