Whistleblower Policy:
Reporting Concerns of Illegal or Unethical Behavior

Introduction
PCORI encourages employees to come forward with good faith reports of suspected illegal or unethical behavior relating to PCORI. Reports of suspected illegal or unethical behavior may include concerns such as: fraud; waste; abuse; conflicts of interest; discrimination; harassment; retaliation; activities that could harm the public’s health or safety; financial accountability or mismanagement; violations of ethical or professional standards; violations of PCORI’s policies and procedures; or violations of applicable federal, state, or local laws.

This policy is not intended for and should not be used for reporting:
- Concerns or opinions on internal department, division, or unit matters that can be addressed by way of the normal course of business.
- Concerns or opinions on PCORI policies and practices.
- Complaints about employee relations, performance and supervision, or compensation and benefits that can be addressed through PCORI’s People Strategy and Services division.
- Concerns about a contractor's performance under a services contract that can be addressed through PCORI’s Procurement unit.
- Concerns about an awardee or recipient of PCORI funding that can be addressed through PCORI’s Patient-Centered Research Programs department.

Reporting
“Report” refers to a good faith written or verbal statement, claim, or allegation, made by an individual or group of individuals of a concern about suspected instances of illegal or unethical behavior.

Employees should typically first seek clarification, guidance, and/or support about concerns from their supervisor and/or relevant PCORI divisions, such as the People Strategy and Services division or the Finance and Administration division. If the supervisor or relevant PCORI division believes that the issue is beyond the scope of their area and relates to suspected illegal or unethical behavior, the concern should be forwarded to the Office of General Counsel, to the attention of the Ethics Counsel and Compliance Officer.

If an employee is not comfortable speaking with a supervisor or the relevant PCORI division, or the supervisor or division is the subject of the concern, or the employee is not satisfied with the response from their supervisor or the relevant division and the concern is about suspected illegal or unethical behavior, the employee may notify the Office of General Counsel, to the attention of the Ethics Counsel and Compliance Officer, in writing at whistleblower@pcori.org or verbally.

Reports may also be made via Compliance Line, a third-party reporting service authorized by PCORI to receive reports verbally via phone (833) 225-3465 or in writing at the website: https://pcori.navexone.com or

This service provides the option to make a report anonymously and confidentially.
All reports must be made in good faith and should be as specific as possible to enable understanding of the issues. Persons reporting suspected illegal or unethical behavior should not attempt to investigate the matter independently, as doing so may compromise the integrity of the review and/or a possible investigation and adversely impact both, the reporting person and PCORI.

**Receipt and Consideration of Reports**
The Office of General Counsel is responsible for receipt and assessment of reports. All reports will be assessed to determine whether the report includes a topic or allegation that can be characterized as falling within this policy and determine the plan of action as appropriate. Depending on the outcome of the assessment, the Office of the General Counsel may take additional steps given the nature of the report and initial assessment, including but not limited to, seeking further information from the reporter (if identified) or other sources, referring the issues raised by the report to a PCORI division or employee for consideration, and/or investigating the report.

All employees are expected to participate in good faith in any assessment or investigation of a report of suspected illegal or unethical behavior.

The reporter will receive confirmation that the report has been received, if the reporter and contact information is identified. Subject to legal and other constraints and depending on the nature of the report and the particular facts, additional information may be provided as appropriate.

**Confidentiality**
Reporters are encouraged to identify themselves when reporting suspected illegal or unethical behavior to facilitate follow-up and assessment, investigation, and disposition.

PCORI is committed to maintaining the confidentiality of the review and assessment of the reports. Every effort will be made to protect a reporter’s identity; however, assessment, investigation and/or disposition of a report may not be possible without the source of the information being identified.

**Non-Retaliation**
PCORI prohibits retaliation against any person involved in reporting a concern or participating in the assessment process or for providing information relevant to the report or assisting in an assessment or investigation about a report about suspected illegal or unethical behavior (“Protected Activities”). PCORI prohibits retaliation in response to any Protected Activities, even if the report of suspected illegal or unethical behavior is determined to be unfounded by an assessment or investigation.

Retaliation includes conduct such as the termination of employment, demotion, suspension, decreased compensation, intimidation, harassment, coercion, significant changes in job responsibilities or working conditions inconsistent with the employee’s position, salary or grade, or other forms of formal or informal reprimand, which is in response to any Protected Activities.

Notwithstanding the foregoing, retaliation does not include disciplinary action taken to address an employee who knowingly makes a false report, provides false or misleading information during an assessment or investigation, or acts in bad faith.

**Organizational Reports**
The Governance Committee of the Board of Governors will receive periodic reports with a summary of reports received under this Whistleblower Policy and the disposition of those reports.

**History:**
*Approved by PCORI Board of Governors 1/20/2011*
*Amended and approved by PCORI Board of Governors 3/25/2014*
*Amended and approved by PCORI Board of Governors 3/19/2024*