

SHPO Disciplinary Standards

It is the policy of Samaritan Health Services to maintain a posture of positive motivation with employees; to treat all employees fairly, consistently and equally; and to administer corrective action, where necessary, on a consistent basis.

Responding to non-compliance or wrongdoing

SHPO believes that appropriate corrective action is an important means of ensuring compliance. Immediate and consistent discipline will be enforced for violations of laws, regulations, standards, policies, and practices. Anyone committing violations will be subject to discipline appropriate with the severity of the violation, but not limited to, suspension, termination, or denied access.

Levels of corrective action

Each level has different type(s) of disciplinary actions and varies with the severity of the violation. The disciplinary actions taken depend upon whether the problem has been repeated despite previous corrective actions, counseling and/or training, the employee's work record, the impact the conduct and performance have on the organization or member, and the magnitude of the problem. Each Level is responsible for completing and storing documentation of the corrective action(s) according to state and federal regulations.

- SHS- Corporate Integrity Program Policy
- SHS HR and Information Privacy and Security corrective action
- SHPO Compliance Program corrective action

SHS Corporate Integrity Program Policy

This policy states:

- Degrees of corrective action for employees will be defined in policy.
- Medical staff bylaws and credentialing or conduct policies will provide resolution and disciplinary guidance for members of the medical staff or practitioners with clinical privileges, unless specifically excluded under contract.
- The independent contractor corrective action process will be addressed in the independent contractor agreement.
- The vendor policy will state the chain-of-events and corrective action process for SHS vendors.

SHS HR and Information Privacy and Security corrective actions

SHS HR corrective action is issued in situations where individual behavior or work performance does not meet Samaritan Health Services standards. Examples of misconduct that will result in disciplinary action include but are not limited to: insubordination, no call/no show, violations of the law, physical and verbal threats, lapse in license, etc. (Supervisors are to contact Human Resources when unsure regarding the appropriate disciplinary level.)

SHS Information Privacy and Security corrective action is issued when inappropriate access or disclosure of sensitive and/or protected information and non-conformance to State and Federal information privacy and security standards. Current employee corrective action through HR may be considered when determining final corrective action recommendation.

Types of disciplinary actions may include:

- Coaching
- Verbal Counseling
- Written Counseling
- Final Written Counseling
- Final Written Counseling with Suspension
- Suspension
- Termination

SHPO Compliance Program corrective action

Is issued to correct an employee or department violation of state or federal laws and regulations, SHPO policy or process standards, internal audit protocol, or line of business contractual requirements. The Compliance Program corrective action is a document that presents the violation and the corrective action procedures, including steps and dates toward resolution. Procedures used to correct a violation may include but are not limited to:

- 1:1 verbal counseling with Supervisor, Manager, or Training Manager that can consist of a review of the department process or a policy

- Departmental training via Performance Manager or at department staff meeting
- Updating the process/work instruction to prevent the violation from reoccurring
- Routine quality checks by the functional department

Investigation and resolution

SHPO will promptly, thoroughly, uniformly, and objectively investigate and resolve suspected non-compliance or wrongdoing. As appropriate, referral to law enforcement authorities, a corrective action plan, the return of any overpayment's, or a report to the applicable authoritative agency will occur. Under certain circumstances, investigations may be conducted under the attorney-client privilege.

Duties of all SHS employees

- Support and comply with its compliance programs and related policies.
- Participate in compliance education.
- Cooperate with compliance audits and investigations.
- Report suspect or are aware of a violation of compliance or fraud, waste or abuse.

Compliance reports are handled discretely and every effort is made to maintain confidentiality of the individual and the information in a report. No retaliatory action will be taken against an individual making a "good faith" report. The Compliance Hotline is available for those individuals desiring anonymity. Reports can be submitted:

- To your manager or supervisor
- To SHPO Compliance Dept. via email: SHPOCompliance@samhealth.org
- To Chris Norman Compliance Officer, 541-768-4119 or Chnorman@samhealth.org
- SHPO Compliance fax: 541-768-9791
- To SHS Corporate Compliance Officer, Anne Daly, compliance@samhealth.org
- To SHS Compliance Hotline: 1-866-297-0489
- To Ethics Point Hotline: www.ethicspoint.com