

**REFUAH COMMUNITY HEALTH COLLABORATIVE**  
**(A Program of Refuah Health Center)**

Manual Section: Compliance-DSRIP	DSRIP-COMP -04
Subject: Disciplinary Action	Page: 1 of 2

**POLICY:** It is the intention of Refuah Community Health Collaborative (RCHC) to enforce its Compliance Policies, which are designed to detect and prevent issues of non-compliance. This policy sets forth guidance regarding disciplinary action for RCHC personnel<sup>1</sup> who have failed to adhere to RCHC’s Standards of Conduct, Compliance policies and procedures, DSRIP Program rules and regulations, federal and/or state laws, or those who have otherwise engaged in wrongdoing.

RCHC places an affirmative duty on every employee to report any actual or perceived compliance issues. RCHC will not retaliate for any reports made in good faith (see Report of Wrongdoing and Corrective Action Policy). Personnel may be disciplined for (i) failing to report suspect problems; (ii) participating in non-compliant behavior; or (iii) encouraging, directing, facilitating or permitting either actively or passively non-compliant behavior. If disciplinary action is warranted, the Chief Administrative and Medical Officer shall work with the Human Resources Department to implement such action. Personnel may also be subject to disciplinary action, in accordance with this policy, for failing to perform any of the required compliance training and assignments.

**IMPLEMENTATION:**

If personnel is found to be in violation of RCHC’s Compliance Policies and/or has otherwise engaged in any type of wrongdoing, or has failed to report issues of noncompliance that the person had knowledge of, RCHC shall take the following steps:

1. The Chief Administrative and Medical Officer will review the violation in consultation with the Human Resources Department to determine the appropriate level of discipline.
2. The appropriate level of discipline will be assessed on a case by case basis.
3. Disciplinary action against personnel will be applied in an appropriate and consistent manner. Disciplinary action includes, but is not limited to:
  - Oral warning;
  - Written warning;
  - Retraining and/or reevaluation;

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<sup>1</sup> For purposes of this policy, “personnel” includes temporary, part-time and full-time employees; independent contractors, and officers of RCHC.

- Discussion of policies and procedures;
  - Probation;
  - Temporary suspension;
  - Termination.
4. The Chief Administrative and Medical Officer shall enforce disciplinary action upon any personnel found to be in violation and the Human Resources Department shall maintain a record of the violation in the person's file.
  5. The Human Resources Department shall advise the Chief Compliance Officer of any compliance violations.
  6. The Chief Compliance Officer shall report to the Compliance Committee, on a quarterly basis, any compliance violations. The names of the parties shall be kept confidential when reporting.

**Responsible Party:** Azizza Graziul, Esq., Chief Compliance Officer

**Approved:** 3/2016

**Reviewed:** 3/2016, 4/2017

**Revised:**

**This policy and procedure shall be periodically reviewed and updated consistent with the requirements and standards established by the Executive Governing Body and Federal and State law and regulations.**