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| Subject:                       | Discipline and Corrective Action  |
| Endorsed By:                   | Compliance Committee  |
| Approved By:                   | Compliance Committee, Board of Managers   |
| DSRIP Implementation Deadline: | April 2015  |
| Effective Date:                | October 2015  |
| Supersedes:                    | April 2015  |
| Purpose:                       | To provide guidance if violations occur related to the Compliance Program, Code of Conduct and the accompanying policies and procedures, disciplinary action shall result as described herein.  |
| Policy:                        | SI- PPS is committed to achieving the highest standards of ethics and compliance with applicable laws, rules and regulations as related to the DSRIP program. SI-PPS expects all PPS Associates to adhere to its Code of Conduct.   |
| Procedure:                     | <p>1. If the SI-PPS Compliance Officer concludes that a violation of the Code of Conduct and/or the Compliance Program has occurred, appropriate discipline and/or corrective action, including suspension, termination or exclusion from SI- PPS and/or the DSRIP program may be imposed. The SI-PPS Compliance Officer will report all such matters to the Governing Body and the Compliance Committee, which will be responsible for recommending appropriate action.</p> <p>2. The imposition of disciplinary or corrective action shall be based on the individual or entity’s misconduct, condoning of unlawful actions by others, retaliation against those who report suspected wrongdoing, or other violations of the Code of Conduct and the Compliance Program. Disciplinary or corrective action may result from instances where a PPS Associate:</p> |

- Fails to report suspected problems or violations, and should have known of a policy violation;
- Participates in non-compliant behavior;
- Encourages, directs, facilitates, or permits, either actively or passively, non-compliant, unlawful, and/or unethical behavior in connection with SI-PPS' operations and/or the DSRIP Program;
- Fails to perform any obligation or duty relating to compliance with the Code of Conduct and the Compliance Program or applicable laws or regulations;
- Fails as supervisors, managers, executives, and/or governing body members to correct foreseeable compliance violations of subordinates;
- Refuses to cooperate with an investigation conducted by SI-PPS;
- Refuses to assist in the resolution of compliance issues;
- Intimidates or retaliates against an individual that reported a compliance violation or participated in a compliance investigation;
- Intentionally makes false compliance reports in bad faith; or
- Violates the Compliance program and/or the SI-PPS' HIPAA program and policies and procedures.

3. Every violation will be considered on a case-by-case basis to determine the appropriate sanction. Disciplinary or corrective actions for violations shall be fairly and firmly enforced and will be administered in an appropriate and consistent manner. Disciplinary and/or corrective action may include, without limitation, one or more of the following:

- Verbal counseling;

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|                       | <ul style="list-style-type: none"> <li>• Issuing an oral or written warning;</li> <li>• Entering into and monitoring a corrective action plan. The corrective action plan may include requirements for individual or group remedial education and training, consultation, proctoring and/or concurrent review;</li> <li>• Probation for a specified period;</li> <li>• Suspension for a specified period;</li> <li>• Modification of assigned duties; or</li> <li>• Immediate exclusion from SI-PPS, the DSRIP program and/or immediate termination of employment or contractual relationship with SI-PPS.</li> </ul> |
| Scope:                | SI-PPS Associates (PPS Associates shall mean all individuals and entities that participate in or do business with SI-PPS, including but not limited to its employees, independent contractors, vendors, agents, suppliers, executives and governing body members).  |
| Project(s):           |   |
| Regulatory Alignment: | New York Social Services Law §363-d subd. 2 and 18 NYCRR §521.3(c),   |
| Reference(s):         |   |
| Attachment(s):        | none  |

Reviewed/Revised by Regina Bergren April 2016

Approved by Compliance Committee: August 2016

| Partner Organization | Responsible Staff Name & Title | Date Reviewed | Signature |
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