

NORTHCARE NETWORK

POLICY TITLE: Enforcement & Discipline	CATEGORY: Compliance	
EFFECTIVE DATE: 3/21/13	BOARD APPROVAL DATE: 3/21/13	
REVIEWED DATE: 6/6/25	REVISION(S) TO POLICY STATEMENT: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	OTHER REVISION(S): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
RESPONSIBLE PARTY: Compliance & Privacy Officer and Human Resources Manager	CEO APPROVAL DATE: 7/1/25 Megan Rooney, CEO	

APPLIES TO

NorthCare Network Personnel

POLICY

Enforcement and discipline guidelines contained or referenced in the NorthCare Network Compliance Plan are to be consistently enforced through appropriate disciplinary mechanisms including, as appropriate, the discipline of individuals responsible or otherwise accountable for failure to detect an offense. It is the policy of NorthCare Network that officers and supervisors are accountable for the foreseeable behavior of their subordinates. Adequate discipline of individuals responsible for an offense is a necessary component of enforcement; however, the form of appropriate discipline will be case specific.

PURPOSE

The purpose of this policy is to articulate NorthCare Network's commitment to consistent application of those guidelines contained and/or referenced in its Compliance Plan regarding Enforcement and Discipline of its personnel in relation to regulatory non-compliance.

DEFINITIONS

N/A

REFERENCES

- Balanced Budget Act, 438.608
- NorthCare Network Compliance Plan and Related Policies
- Applicable Personnel Policies

HISTORY

REVISION DATE: 11/5/14, 5/16/17, 8/23/21, 6/10/22, 5/1/23, 8/26/24, 6/6/25

REVIEW DATE: 3/13/13, 12/18/13, 11/5/14, 9/16/15, 7/27/16, 5/16/17, 3/13/18, 1/22/19, 12/3/19, 10/21/20, 8/23/21, 6/10/22, 5/1/23, 8/26/24, 6/6/25

CEO APPROVAL DATE: 3/13/13, 12/18/13, 11/5/14, 10/6/15, 8/2/16, 6/6/17, 3/27/18, 2/7/19, 1/7/20, 11/3/20, 9/7/21, 7/12/22, 5/2/23, 9/3/24, 7/1/25

BOARD APPROVAL DATE: 3/21/13

PROCEDURES

- A. The discipline shall be consistent. Therefore, supervisors and human resources will coordinate their disciplinary and performance evaluation policies and procedures to assure that they are consistent between departments.
- B. There shall be fair and uniform mechanisms for the discipline. The Chief Executive Officer and Human Resources Manager, in consultation with the Compliance Officer & Privacy Officer (CO) and/or the Compliance Oversight and Risk Management Committee, as appropriate, shall:
 - 1. Ensure that there is a uniform procedure for determining if a regulatory compliance policy has been violated.
 - 2. Articulate the range of discipline for violating these policies.
 - 3. Articulate factors that may affect the degree of discipline.
 - 4. Describe the operational procedures for finding a violation and determining application of the discipline, including a reasonable dispute resolution process and/or fair opportunity for appeal.
- C. There shall be discipline for those who (whether negligently, recklessly, or intentionally) fail to detect an offense committed by a subordinate.
- D. There shall be discipline for those who commit an offense, and such discipline will vary in proportion to the severity and/or extent/volume of the infraction(s). The administration of discipline for violations of NorthCare Network's Compliance Policies shall be administered in accordance with Personnel Policies otherwise applicable, including any regarding:
 - 1. Documentation,
 - 2. Progressive Discipline, and
 - 3. Goals, Rewards, and Evaluations.
- E. If an employee of NorthCare Network violates the compliance program and/or any NorthCare Network compliance program policies or procedures, that employee will be subject to disciplinary action. The specific action will depend on the nature and severity of the violation. Discipline may include:
 - 1. Counseling
 - 2. Verbal warning
 - 3. Written warning
 - 4. Unpaid Suspension
 - 5. Termination