



Title: Addressing Instances of Non-Compliance Through Appropriate Disciplinary Actions Policy

Date Created: March 1, 2015

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Date Approved by IPA Board of Directors: September 24, 2024

Policy# CC6

Purpose:

To ensure Affected Individuals are aware of the consequences in instances of non-compliance with Care Compass Network's ("CCN") and its Affiliated Entities' Compliance Program and regulatory requirements.

Definitions:

Affected Individual(s): All persons who are affected by Care Compass Entities' risk areas including Care Compass Entities' employees, officers, Directors, managers, contractors, agents, subcontractors, independent contractors, governing bodies, or third-parties, who or that, in acting on behalf of the Care Compass Entities: (i) delivers, furnishes, directs, orders, authorizes, or otherwise provides health or social care items and services under State, Federal, or Care Compass programs; and (ii) contributes to the Care Compass Entities' entitlement to payment under Federal health or social care programs, or from other payor sources.

Care Compass Entities: Organizations that are directly, or indirectly through one or more intermediaries, owned or controlled by, or are under common ownership or control of, Care Compass Network, including Care Compass Collaborative, Inc. and Care Compass Supporting IPA, LLC.

Participant: Any organization that has signed an agreement related to a funded program with the Care Compass Entities.

Staff: Employees, contractors, agents, consultants, volunteers, and others who act on the Care Compass Entities' behalf.

Policy:

The Care Compass Entities are committed to ensuring that regulatory requirements and their Compliance Program policies and procedures are adhered to by Affected Individuals. To demonstrate such commitment, it is the policy of the Care Compass Entities to publicize and consistently enforce these policies and procedures by imposing appropriate disciplinary action.

I. Publication of Disciplinary Mechanisms.

- a. The Director of Compliance is responsible for ensuring the consequences of violating the Care Compass Entities' compliance policies and procedures are publicized, at least annually. Methods of publicizing may include, but are not limited to:

- i. Implementing written policies and procedures;
 - ii. Training and education;
 - iii. Posting of notices in the Care Compass Entities' common areas and shared file locations;
 - iv. Providing e-mail notifications;
 - v. Providing newsletter articles;
 - vi. Attending and providing information at Staff and committee meetings; and
 - vii. Incorporating compliance as an element of every director's, officer's, and Staff member's job description or contract and Participants' contracts.
- b. In publicizing the Care Compass Entities' position on the enforcement of its compliance standards and procedures, the Director of Compliance will ensure that violations, including but not limited to, failure to report the misconduct of others when required, will be emphasized as a serious infraction and that discipline, up to and including termination of employment or contract, removal from the Board of Directors, or removal of a Participant from participation with the Care Compass Entities as a result of any finding of violation, may be imposed.
- c. Managers, supervisors, Board of Directors members, and committee chairs will be made aware that they may be subject to discipline for the neglect or deliberate failure to detect violations of the Care Compass Entities' compliance standards that occur within their areas of responsibility. If a supervisor, manager, Board of Directors member, or committee chair, due to negligence or carelessness, contributes to or perpetrates misconduct, the Care Compass Entities will take appropriate disciplinary action that is commensurate with the seriousness of the violation in question.

II. Disciplinary Actions for Staff.

- a. Disciplinary actions for violations involving suspected privacy and/or security breaches will not commence without verification of a breach following an investigation into the potential breach in accordance with the Care Compass Entities Breach Notification Policy.
- b. The Director of Compliance and the supervisor of the Staff member being disciplined shall determine the type of disciplinary action to be taken in accordance with the HR1-11 Disciplinary Action Procedure.
- c. In determining what level of discipline is appropriate, the Director of Compliance and Staff member's supervisor will consider whether the individual voluntarily reported the issue and fully cooperated in any investigation and review any other mitigating or aggravating circumstances.
- d. The Director of Compliance and Staff member's supervisor may confer with the Executive Director ("ED"), other members of management, and/or qualified legal counsel, as appropriate, to determine what disciplinary action should or can be taken. The Care Compass Entities shall endeavor consistently to apply the Care Compass Entities' standards for imposition of disciplinary action, as set forth in the HR1-11 Disciplinary Action Procedure.
- e. In order of increasing severity, disciplinary actions that may be taken include, but are not limited to:
 - i. Verbal Warning,
 - ii. First Written Warning,
 - iii. Final Written Warning, and

iv. Termination.

1. The Care Compass Entities have the right to terminate any Staff member at any time, with or without notice. Compliance-related offenses that may warrant such termination include:
 - a. Violating the Codes of Conduct or any other Care Compass Entities policy and/or procedure;
 - b. Committing intentional violations of local, State, and Federal laws or regulations governing payment and billing procedures and practices at the Care Compass Entities;
 - c. Taking retaliatory actions against others for reporting a compliance incident, issue, or matter to the Director of Compliance or Management; or
 - d. Presenting false or misleading information or data during the course of an audit or investigation conducted or overseen by the Director of Compliance or a government agency.

III. Disciplinary Actions for Participants.

- a. Disciplinary actions may be imposed on a Participant, up to and including termination from participation with the Care Compass Entities and associated benefits, dependent on severity and intent.
- b. Non-compliance with legal or regulatory requirements or illegal activities on the part of a Participant may result in immediate termination from participation with the Care Compass Entities, subject to review by the Director of Compliance and ED.

CCN Board Approval History: 3/11/2015, 12/8/2015, 12/21/2017, 12/10/2019, 11/10/2020, 11/9/2021, 11/8/2022, 8/08/2023, 6/11/2024, 8/13/2024, 6/10/2025

CCC Board Approval History: 9/12/2023, 6/20/2024, 9/24/2024

IPA Board Approval History: 9/12/2023, 6/20/2024, 9/24/2024

Compliance Committee Review History: 12/8/2015, 10/28/2016, 11/17/2017, 1/18/2019, 11/15/2019, 10/16/2020, 10/15/2021, 11/1/2022, 7/28/2023, 5/12/2024, 7/24/2024, 5/22/2025

Policy Revisions:

Date	Revision Log	Updated By
3/1/2015	Original creation	Ann Homer
11/19/2015	Updated to reflect Care Compass Network organization structure	Rebecca Kennis
11/3/2016	Added Board Review History	Andrea Rotella
11/17/2017	Updated with changes by Compliance and Audit Committee	Andrea Rotella
11/15/2019	Updated with changes by Compliance and Audit Committee	Andrea Rotella
10/16/2020	Aligned with CCN HR1-11 Disciplinary Action Procedure	Andrea Rotella
9/1/2021	Removed references to PPS	Cathy Petrak

8/29/2022	Added Partner definition and updated Partner Organization to Partner throughout	Cathy Petrak
7/12/2023	Added “Affiliated Entities” throughout to update to an enterprise-wide policy; updated Partner to “Participant” definition and term throughout; updated Corporate Compliance and Privacy Officer title to “Director of Compliance” throughout	Cathy Petrak
3/20/2024	Updated with HITRUST requirement to ensure disciplinary actions do not commence without prior verification of suspected security or privacy breaches	Cathy Petrak
5/7/2025	Updated “Affiliated Entities” to “Care Compass Entities” throughout and added “Affected Individuals” definition and updates throughout	Cathy Petrak

This Policy shall be reviewed periodically, but not less than once every 12 months, and updated consistent with the requirements established by the Board of Directors, Care Compass Network’s Leadership Team, Federal and State law(s) and regulations, and applicable accrediting and review organizations.