

EVMS Medical Group

POLICY: Sanctions

DATE: 3/2003

CATEGORY: PRIVACY

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Page 1 of 1

POLICY: It is the policy of EVMS Medical Group and affiliates to apply sanctions to employees failing to comply with the policies and procedures regarding confidential healthcare information.

PROCEDURE:

1. If an employee is found to violate any policy or procedure in regards to confidential healthcare information EVMS Medical Group policy on disciplinary action will be implemented.
2. The severity of discipline will be determined according to:
 - a. The severity of the violation.
 - b. If the violation was intentional or unintentional.
 - c. If the violation indicates a pattern or practice of improper use or release of confidential healthcare information.
3. The degree of discipline may range from a verbal warning to termination.
4. Each episode of employee discipline regarding confidential healthcare information is to be documented and reported to Human Resources, the Compliance Officer and Privacy Office.
5. Documentation is to include:
 - a. Name of employee
 - b. Degree of violation
 - c. Location of violation
 - d. Date and time of violation
 - e. Disciplinary action provided
6. Refer to the EVMS Medical Group Disciplinary policy for further information.