



Index Section:	Patient Privacy (PtP)	Effective: 4/17/13
Policy:	Progressive Employee Discipline for Incidents Concerning Privacy and Confidentiality (PtP. 2.0)	Modifies Existing Policies: N/A
	Primary Responsibility: Medical Director, Privacy Officer, Site Managers, and Human Resources	Approved: 4/17/13 <i>Walter D. Gilbert, MD</i> Medical Director

POLICY: Progressive Discipline may be initiated for various reasons, including, but not limited to, violations of the employer’s work rules or standards of conduct, or for poor job performance. The severity of the action generally will depend on the nature of the offense and on the employee’s record, and may range from a verbal warning to immediate termination.

Progressive Discipline may progress through the following sequential steps:

1. Verbal Warning
2. Written Warning
3. Suspension
4. Termination

Any and all of these steps may or may not be utilized depending upon the individual circumstances and the nature of the infraction. Moreover, exceptions or deviations from the normal procedure may occur whenever the company deems appropriate. Furthermore, certain types of behavior may result in immediate termination without resort to the progressive discipline guidelines.

Specific Guidelines for Violations of PHI Privacy and Confidentiality:

<i>No Discipline</i>	<i>So long as the employee does not cause a reportable event, and in the absence of carelessness, including careless failure to know Galen privacy policies, no employee will be subject to discipline for an improper disclosure of PHI otherwise made in good faith. Even so, any employee may be subject to additional privacy training at any time, without fault.</i>
<i>Verbal Warning</i>	<i>Unintentional violations of privacy caused by simple carelessness, lack of training, or other human error, such as misdirecting PHI via mail, fax, or unencrypted e-mail. Causing a reportable event shall subject the employee to verbal warning at a minimum, regardless of the degree of fault.</i>
<i>Written Warning</i>	<i>Unintentional disclosures of PHI resulting from a repeated failure to know and follow privacy policies. Failure to report privacy and security violations of self or others will subject employee to a written warning, at a minimum.</i>



<i>Suspension</i>	<i>At a minimum, employees are subject to suspension for knowingly, intentionally, or recklessly accessing PHI without a legitimate need, including access based upon personal curiosity. Purely accidental and unintentional access of PHI during the course of the employee's duties will not subject employee to suspension.</i>
<i>Termination</i>	<i>Willful or extremely reckless violations of privacy policies. Employees may also be subject to the termination if they have been repeatedly warned or disciplined, or if the employee's behavior or failure to perform results in a reportable violation that is significantly harmful to either a patient or Galen.</i>

Nothing in this policy shall confer upon the employee any right to continue in the employment of Galen, nor shall it interfere with or restrict in any way the rights of Galen to terminate the employee at any time, for any reason, with or without cause.