

[YOUR COMPANY] Standardized Disciplinary Measures

The following is our sanction policies against employees for violating privacy law. We take individual circumstances under advisement before determining a specific punishment. The progressions of severity in both violations and corrective actions are as follows:

Progression 1

If an employee lacks privacy and security education, unintentionally violates privacy law, or lacks vigilance. For example:

- Sharing computer log-ons
- Not protecting the secrecy of passwords
- Not logging off a computer when left unattended

Corrective action:

Verbal or written warning and additional training

Progression 2

If an employee intentionally violates company policy or repeats a Progression 1 offense. For example:

- Accessing patient records without a legitimate reason
- Using another employee's log on without authorization
- Using confidential information without proper authorization
- Releasing patient information without proper authorization
- Continued violation of policy

Corrective action:

Written reprimand and additional training

One to three day suspension and additional training

Progression 3

If an employee maliciously violates company policy and/or applicable law. For example:

- Accessing and divulging confidential information for personal gain
- Intentionally modifying or destroying computer hardware, software or information
- Intentionally divulging confidential information in order to damage an individual or your organization
- Continued violation of policy

Corrective action:

Termination of employment

Reporting

Any violations of privacy policy and/or law must be immediately reported to the compliance officer in a confidential manner.

Retention and Accounting for Disclosures

Any violations of privacy policy and/or law are to be documented in the appropriate personnel file. It is necessary to include all handwritten notes and copies of affected computer files. In addition, a copy of all documentation and copies of computer files must be kept in a secure location under the control of the compliance officer.