

DISCIPLINARY STANDARDS

It is the policy of **ATRIO** to maintain a posture of positive motivation with employees; to treat all employees fairly, consistently and equally; and

RESPONDING TO NON-COMPLIANCE OR WRONGDOING

ATRIO believes that appropriate corrective action is an important means of ensuring compliance. Immediate and consistent discipline will be enforced for violations of laws, regulations, standards, policies, and practices. Anyone committing violations will be subject to discipline appropriate with the severity of the violation, but not limited to, suspension, termination, or denied access.

LEVELS OF CORRECTIVE ACTION

- **ATRIO** HR and Information Privacy and Security Corrective Action
- **ATRIO** Compliance Program Corrective Action

Each level has different type(s) of disciplinary actions and varies with the severity of the violation. The disciplinary actions taken depend upon whether the problem has been repeated despite previous corrective actions, counseling and/or training, the employee's work record, the impact the conduct and performance have on the organization or member, and the magnitude of the problem. Each Level is responsible for completing and storing documentation of the corrective action(s) according to state and federal regulations.

HUMAN RESOURCES AND INFORMATION PRIVACY AND SECURITY CORRECTIVE ACTIONS

ATRIO HR Corrective Action is issued in situations where individual behavior or work performance does not meet **ATRIO** standards. Examples of misconduct that will result in disciplinary action include but are not limited to:

- Insubordination
- Violations of the law
- Lapse in license
- No call/no show
- Physical and/or verbal threats

(Supervisors are to contact Human Resources when unsure regarding the appropriate disciplinary level.)

ATRIO Information Privacy and Security Corrective Action is issued when inappropriate access or disclosure of sensitive and/or protected information and non-conformance to State and Federal information privacy and security standards. Current employee corrective action through HR may be considered when determining final corrective action recommendation. Types of disciplinary actions may include:

- Coaching
- Verbal Counseling
- Written Counseling
- Final Written Counseling
- Final Written Counseling with Suspension
- Suspension
- Termination

COMPLIANCE PROGRAM CORRECTIVE ACTION

Corrective action is issued to correct an employee or department violation of state or federal laws and regulations, **ATRIO** policy or process standards, internal audit protocol, or line of business contractual requirements. The Compliance Program corrective action is a document that presents the violation and the corrective action procedures, including steps and dates toward resolution. Procedures used to correct a violation may include but are not limited to:

- 1:1 verbal counseling with supervisor or manager that can consist of a review of the department process or a policy
- Staff training
- Updating the process to prevent the violation from reoccurring
- Routine quality checks by the operational department

INVESTIGATION AND RESOLUTION

ATRIO will promptly, thoroughly, uniformly, and objectively investigate and resolve suspected non-compliance or wrongdoing. As appropriate, referral to law enforcement authorities, a corrective action plan, the return of any overpayments, or a report to the applicable authoritative agency will occur. Under certain circumstances, investigations may be conducted under the attorney-client privilege.

DUTIES OF ALL ATRIO EMPLOYEES

- 1) Support and comply with our compliance program and related policies
- 2) Participate in compliance education
- 3) Cooperate with compliance audits and investigations
- 4) Report, suspect, or are aware of a violation of compliance or fraud, waste or abuse

Compliance reports are handled discretely and every effort is made to maintain confidentiality of the individual and the information in a report. No retaliatory action will be taken against an individual making a "good faith" report. The Compliance Hotline is available for those individuals desiring anonymity. Reports can be submitted:

- To your supervisor or a member of senior management
- To **ATRIO** Compliance Dept. via email: Compliance@atriohp.com
- To the Chief Compliance Officer: 971-304-0068
- atriohp.com

IF YOU SEE SOMETHING, SAY SOMETHING.

If you suspect or are aware of a violation of compliance or fraud, waste or abuse, you are responsible for reporting your concerns to any of your compliance resources.

WHAT KINDS OF ACTIVITY DO YOU NEED TO REPORT?

You should report any concerns regarding compliance issues such as:

- Violations of law or regulation
- Violations of policy and standards of business conduct
- Violations of policies regarding PHI disclosures
- Violations of contractual requirements
- Any other serious wrongdoing with **ATRIO** operations, including conduct that is inconsistent with organizational values.

ARE THERE CONSEQUENCES FOR REPORTING?

ATRIO practices a non-intimidation and non-retaliation policy for:

- Reporting potential non-compliance
- Participating in investigating issues
- Audits and remedial actions
- Reporting to appropriate officials
- Asking questions about compliance requirements
- Issues involving good faith participation

DON'T HESITATE TO ASK QUESTIONS.

If you are unsure whether to report an activity, consult any of your compliance resources to ask questions.

HAVE QUESTIONS OR WOULD LIKE TO REPORT A VIOLATION?

CONTACT ANY OF YOUR COMPLIANCE RESOURCES.

- Your supervisor or a member of senior management
- Chief Compliance Officer: 971-304-0068
- Anonymously report at **atriohp.com** or mail to:
Compliance Dept
PO Box 12645
Salem OR, 97309

If you suspect or are aware of a violation of compliance or fraud, waste or abuse, you are responsible for reporting your concerns to any of your compliance resources.

