



compliance program and the code of conduct and may be subject to discipline, up to and including termination; or may subject the contractor to sanctions.

4. Employees shall participate in compliance education and training during New Employee Orientation and at least annually thereafter, and shall participate in compliance activities and additional training as required by their respective departments.

### **B. Confidentiality**

The Practice shall take reasonable and appropriate efforts to maximize a reporting employee's confidentiality and will honor all requests for confidentiality to the limit allowed by law. Staff, Board, and others who provide services on behalf of the Practice, are expected to assist in the resolution of the compliance issue. In the event the Practice must take a course of action that could reveal the identity of a reporting employee, the Practice shall, to the extent reasonably feasible, notify the employee of such intended course of action.

### **C. Disciplinary Action**

Employees, Board, and others who provides services on behalf of the Practice actions (or inaction) that may result in discipline, include, but are not limited to the following:

1. Authorizing or participating directly in actions that are in violation of any applicable local, state or federal law/regulation or the compliance program, the code of conduct or other Practice policies and procedures.
2. Deliberately failing to report a violation or deliberately withholding relevant and material information concerning a violation.
3. Retaliating, directly or indirectly, or encouraging others to do so, against anyone who reports a violations;
4. Fabricating or knowingly misrepresenting facts concerning a compliance investigation.
5. Encouraging, directing, facilitating or permitting, either actively or passively, non-compliant behavior and;
6. Stealing

### **D. Fair Enforcement of Discipline**

The Practice shall enforce sanctions and discipline resulting from a violation of this policy, in a fair and consistent manner, in accordance with applicable Human Resources policies and procedures.