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| **MONTCALM CARE NETWORK****611 North State Street, Stanton, MI 48888** |
| SUBJECT: Non-Retaliation and Discipline | Section: 11200 |
| Effective Date: October 22, 2002 | Revised Date: June 25, 2013 |
|  Version: 2 |  Status: Current |

MCN intends for employees and other staff members to use this compliance program as a guide to enhance compliance with applicable Federal, State, and third party payor laws, rules, regulations and policies. MCN may take disciplinary action regarding substantiated claims, as determined by MCN, of wrongdoing in violation of the compliance program or its incorporated policies. No employee who makes a report of alleged wrongdoing in good faith will be subjected to reprisal, harassment, retribution, discipline or discrimination by MCN or any of its employees or agents based on having made the report. Any MCN employee or agent who engages in any such reprisal, harassment, retribution, discipline or discrimination against a good faith reporter may be subject to disciplinary action as deemed appropriate by MCN.

However, an employee will be subject to disciplinary action if MCN concludes that the employee knew, or should have known, that the reporting of wrongdoing was fabricated, not based on true facts, or made in bad faith, or that the report was distorted, exaggerated or minimized to either injure someone else, or to protect him/herself or others.

In order to effectively enforce the compliance program and incorporated policies, the MCN Compliance Officer may recommend to the Executive Director and Human Resources that disciplinary action be taken against an employee for failure to comply with the program or incorporated policies. However, the Executive Director and Human Resources will maintain authority over employee discipline issues.

At the sole discretion of MCN, disciplinary action will follow MCN disciplinary guidelines and policy.