

## Policy 9.8

<b>POLICY TITLE:</b>	<b>COMPLIANCE ENFORCEMENT AND DISCIPLINE</b>	<b>POLICY # 9.8</b>	<b>REVIEW DATES</b>	
<b>Topic Area:</b>	<b>CORPORATE COMPLIANCE</b>	<b><u>ISSUED BY:</u></b> Chief Compliance Officer  <b><u>APPROVED BY:</u></b> Board of Directors	6/26/14	7/22/22
<b>Applies to:</b>	LRE Staff and Operations		7/21/23	2/18/25
<b>Developed and Maintained by:</b>	CEO and Designee			
<b>Supersedes:</b>	N/A	<b>Effective Date:</b> January 1, 2014	<b>Revised Date:</b> 2/18/2025	

### I. PURPOSE

The purpose of this policy is to articulate the LRE commitment to the standards contained and/or referenced in its Corporate Compliance Plan regarding enforcement, consequences, and incentives for its employees and agents in relation to compliance with State and Federal laws and regulations, Medicaid program requirements, and PIHP contractual obligations.

### II. POLICY

Through its commitment to have an effective compliance program, Lakeshore Regional Entity (LRE) will include disciplinary guidelines that identify the consequences of violating the organization's standards of conduct, policies, and procedures.

Enforcement, consequences, and incentives standards contained or referenced in the LRE Corporate Compliance Plan will be consistently enforced through appropriate disciplinary mechanisms, up to and including termination, depending on the egregiousness of the offense.

It is the policy of LRE that officers and managers are accountable for the foreseeable behavior of their subordinates.

Adequate consequences for individuals responsible for an offense is a necessary component of enforcement. The form of disciplinary action that occurs will be appropriate and will be case specific. Each situation will be considered on a case-by-case basis to determine the appropriate response. Disciplinary action will be taken on a fair, equitable, and consistent basis.

Intentional noncompliance will subject transgressors to significant sanctions. Such sanctions could range from oral warnings, written warning, corrective action, suspension, or termination as appropriate.

Disciplinary action is appropriate and will be enforced when a responsible employee's failure to detect a violation is attributable to his or her negligence or reckless conduct.

### **III. APPLICABILITY AND RESPONSIBILITY**

This policy applies to LRE staff and operations.

### **IV. MONITORING AND REVIEW**

The CEO and designee will review this policy on an annual basis.

### **V. DEFINITIONS**

PIHP: Prepaid Inpatient Health Plan

### **VI. RELATED POLICIES AND PROCEDURES**

A. Corporate Compliance Plan

### **VII. REFERENCES/LEGAL AUTHORITY**

- A. 42 CFR, Ch. IV §438.608
- B. Federal Register Volume 64, No. 219
- C. MDHHS Managed Special Supports and Service Contract

### **IV. CHANGE LOG:**

<b>Date of Change</b>	<b>Description of Change</b>	<b>Responsible Party</b>
06/26/2014	New Policy	<del>Corporate</del> Chief Compliance Officer
7/22/2023	Annual Update	CEO and Designee
2/18/2025	Annual Update: changed wording to reflect the Corporate Compliance Plan	CEO and Designee