



HNS Disciplinary Actions and Sanctions for Non-Compliance

HNS seeks to prevent accidental and intentional non-compliance with applicable laws, to detect such non-compliance if it occurs, to discipline those involved in non-compliant behavior, to remedy the effects of non-compliance, and to prevent repeat non-compliance.

Compliance is everyone's responsibility and HNS takes seriously our compliance responsibilities. When a violation of applicable laws, regulations and/or HNS Compliance Policies has occurred, HNS shall take appropriate disciplinary actions.

If HNS suspects fraud, waste or abuse by a contracted healthcare professional, HNS may refrain from the submission of any claims submitted by the physician until an investigation has been completed and/or until a final determination has been made.

Disciplinary measures will be taken on a case-by-case basis. HNS reserves the right to apply sanctions at its discretion, based on the seriousness of the misconduct. The review of misconduct and the imposition of sanctions for contracted health care professionals will be the responsibility of HNS' Compliance Officer and CEO.

Written notifications of sanctions/disciplinary actions will be communicated to the contracted health care professional engaged in the misconduct and will include the misconduct and, as applicable, may include a summary of the results of the investigation.

HNS reserves the right to review and modify its Disciplinary Actions and Sanction Policies at any time and will provide timely notification to contracted health care professionals of any material changes.

Disciplinary Actions:

If HNS concludes that a contracted health care professional has violated laws or regulations or HNS Policies or the policies of HNS contracted health care plans, the contracted health care professional will be subject to appropriate disciplinary action.

Enforcement and discipline may include discipline of contracted health care professionals *who fail to report suspected or known non-compliant conduct and/or who fail to fully cooperate with compliance investigations.*

HNS' disciplinary actions may include any combination of the actions listed below.

1. Issuing a verbal or written warning;
2. Requiring additional compliance training;
3. Requiring the submission and completion of a corrective action plan (CAP);
4. Temporarily suspending the health care professional's access to *HNSConnect* or his/her ability to submit claims to HNS via Office Ally;
5. Auditing of patient health care and financial records;
6. Placing the health care professional on probationary status with HNS;
7. Terminating the health care professional from the network;
8. Reporting the misconduct to the appropriate federal and state authorities, including but not limited to, state licensing boards and the National Practitioner's Data Bank (NPDB);
9. Prosecuting the individual.

Sanctions

Sanctions for Negligent Action

The following sanctions will be applied for misconduct relating to non-compliance.

Disciplinary measures will be taken on a case-by-case basis. HNS reserves the right to apply sanctions at its discretion, based on the seriousness of the misconduct.

First or Second Offense (negligent action):

1. Issuing a verbal or written warning;
2. Requiring additional compliance training or other educational requirements;
3. Requiring the submission and completion of a corrective action plan (CAP);
4. Temporarily suspending the health care professional's access to *HNSConnect* or his/her ability to submit claims to HNS via Office Ally;
5. Auditing of patient health care and financial records;

6. Placing the health care professional on probationary status with HNS;

Third Offense (negligent action):

1. Requiring additional compliance training or other educational requirements;
2. Requiring the submission and completion of a corrective action plan (CAP);
3. Temporarily suspending the health care professional's access to *HNSConnect* or his/her ability to submit claims to HNS via Office Ally;
4. Auditing of patient health care and financial records;
5. Terminating the health care professional from the network;
6. Reporting the misconduct to the appropriate federal and state authorities, including but not limited to, state licensing boards and the National Practitioner's Data Bank (NPDB), as well as to contracted health care plan.

Sanctions for Intentional Action

The following sanctions will be applied for misconduct relating to non-compliance.

Disciplinary measures will be taken on a case-by-case basis. HNS reserves the right to apply sanctions at its discretion, based on the seriousness of the misconduct.

First Offense (intentional action):

1. Requiring additional compliance training;
2. Requiring the submission and completion of a corrective action plan (CAP);
3. Temporarily suspending the health care professional's access to *HNSConnect* or his/her ability to submit claims to HNS via Office Ally;
4. Auditing of patient health care and financial records;
5. Placing the health care professional on probationary status with HNS;
6. Terminating the health care professional from the network;
7. Reporting the misconduct to the appropriate federal and state authorities, including but not limited to, state licensing boards and the National Practitioner's Data Bank (NPDB), as well as to contracted health care plans.
8. Prosecuting the individual.

Second Offense (intentional action):

1. Terminating the health care professional from the network;
2. Reporting the misconduct to the appropriate federal and state authorities, including but not limited to, state licensing boards and the National Practitioner's Data Bank (NPDB) as well as to contracted health care plans.
3. Prosecuting the individual.