

BUTLER COUNTY

Policy Title:	HIPAA - Progressive Discipline Policy		
Policy Number:	HIPAA -C-0015	Effective Date:	04/01/03
Purpose:	This policy sets forth a set of guidelines for a progressive discipline process to be followed when an employee evidences improper adherence to Butler County's policies related to the use and disclosure of PHI.		
Regulation Reference:	Health Insurance Portability and Accountability Act of 1996		

Policy

Progressive discipline is an effective means of correcting inappropriate workforce member behavior and will be utilized when workforce members engage in behavior violative of a client's privacy rights and Butler County's HIPAA privacy and security policies.

Supervisors are responsible for accurate and timely documentation of inappropriate behaviors or performance issues. Progressive discipline will be used consistently. Workforce members will be informed of their expectations regarding confidentiality and HIPAA requirements through HIPAA confidentiality training. The employees will be informed of Butler County's policies and procedures regarding HIPAA and thereby be informed of:

- What is expected behavior and the HIPAA performance standards
- When they are not meeting these expectations
- What must be done to correct the inappropriate behavior and an improvement plan with a time line for its accomplishment
- Consequences if improvement does not occur

The progressive discipline process is meant to assist the workforce member in recognizing the seriousness of their behavior and encouraging their commitment to changing these behaviors. In many situations, informal counseling will be utilized by the supervisor after consultation, as appropriate with Human Resources, and the Privacy Officer or Security Officer to resolve issues prior to the formal corrective action process. The Privacy Officer or Security Officer should be consulted to determine that a particular behavior did in fact violate HIPAA or a HIPAA policy. The Privacy Officer or Security Officer will also thereby determine if the behavior in question must be reported as a HIPAA violation.

An informal counseling session is used by management as a reminder to the workforce member of the policies and practices. Supervisors can utilize informal counseling to explain the HIPAA performance expectations of the job to the

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**Gayle Gliva-McConvey, Catherine F.
Nicholas, Lou Clark**



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