



TITLE: Professional Behavior and Corrective Action Policy for Physicians (Code of Conduct)

STATEMENT OF PURPOSE:

Radiology of Indiana (ROI) physicians are expected to conduct their personal and professional affairs in a manner that does not discredit or adversely affect the reputation of this physician driven organization. This policy provides information to know what is expected during employment related to professional physician behavior. These standards of conduct are designed to protect physicians and to ensure that everyone is held to the same standard. The Radiology of Indiana Board of Directors reserves the right to pursue appropriate corrective action depending upon the nature and severity of the infraction. Violations of this policy can negatively impact our contracted agreements with our respective health systems and could put the corporation at risk of contract termination. The physician code of conduct and behavior policies at respective health systems also merit consideration and this policy would be applied in conjunction with, not in place of any hospital policies.

Corrective actions may include documented verbal warning, written warnings, suspension and/or termination. A progressive corrective action is not guaranteed and if circumstances warrant, termination may be deemed the best course of action, even for a first offense.

RESPONSIBILITY:

1. It is the responsibility of all Radiology of Indiana physicians to notify any member of the Board of Directors, or the Chief Executive Officer, of a potential non-peer review performance / behavior problem. Confidentially to the individual reporting potential performance / behavior problems will be maintained and only shared with the Board of Directors and Chief Executive Officer, if applicable. Peer review (quality of care) concerns should be communicated according to the current established processes of the group. It is the responsibility of all Radiology of Indiana physicians to thoroughly understand this policy.
2. It is the responsibility of any employee of the Radiology of Indiana organization that becomes aware of a performance / behavior problem related to an ROI physician to provide this information to the Chief Executive Officer, who will then notify the Board of Directors of these matters.
3. Retaliation/Reprisal will not be tolerated as a result of an employee's good faith effort of reporting a violation of law, rule, policy or other misconduct to the Board of Directors and/or Chief Executive Officer.

It is the responsibility of the Board of Directors acting as the Professional Ethics Committee (unless a separate Ethic Committee is appointed by the Board of Directors), to thoroughly investigate an alleged performance / behavior problem fairly and to consistently apply this policy before taking any corrective action. The professional ethics committee will formally address the concern with the physician. A performance improvement plan will be presented.

STANDARDS OF CONDUCT:

Examples of unacceptable conduct which may result in corrective action include, but are not limited to the following:

1. Abusive treatment of patients, visitors, employees or physicians, verbally, physically or emotionally.
2. Acts of harassment or workplace violence and/or making substantial threat(s); exhibiting threatening behavior(s) that include but are not limited to loud, vulgar, profane, or abusive language; engaging in violent act(s); assault, regardless of provocation, upon other employees, patients, clients, or physicians.
3. Failure to observe the scheduled working hours (i.e. start time and end time)

4. Abuse/mismanagement of time during assigned working hours (i.e. not completing work assignments)
5. Leaving regularly assigned work location for extended periods of time.
6. Failure to follow corporation or hospital partners safety rules (i.e. handwashing, universal precautions, etc.).
7. Refusing to obey or carry out the policies and procedures approved by the Board of Directors or engaging in other acts of insubordination, disrespect or disobedience.
8. Making false, malicious or inappropriate statements about other physicians, management, employees, patients, or corporation.
9. Deliberate destruction or damage of company property, tools, instruments, equipment or property of fellow employees, patients or physicians.
10. Sexual conduct, indecency, or physical contact that is unwanted and offensive to those individuals who are subjected to it or others who witness it. Examples include, but are not limited to: innuendoes, sexually suggestive statements or comments, epithets, derogation, slurs, sexually inappropriate jokes, propositions, sexually graphic commentaries, threats, and / or sexually suggestive sounds, sexually explicit posters, cartoons, or drawings, sexually suggestive objects or pictures, leering and / or sexually obscene gestures, unwanted physical contact of a sexual nature, including improper intimate touching and / or sexual assault.
11. Negligently or intentionally disregarding the organizations safety rules or common safety practices that do, or would likely, result in personal injury or property damage.
12. Refusal to accept medical staff committee assignments or only participating in medical staff affairs on one's own terms, or doing so in a disruptive or uncooperative manner.
13. Demonstrating conduct detrimental to the interests of the corporation including without limitation, conviction for a criminal offense under federal and/or state law that is related to or impacts your job/employment.
14. Failure to report your conviction of a healthcare-related crime or exclusion from any state or federal health care program.
15. Providing false or misleading information during investigations on employment documents, patient medical records, timecards or other records, altering or falsifying, removing or destroying, without authorization company/patient/medical records or reports.
16. Physicians functioning outside of scope of practice/license as defined by state rules and regulations governing licensure.
17. Non-compliance with conditions noted in physician's Radiology of Indiana employment agreement.
18. Refusal to follow hospital partners "Standards of Behavior/Code of Conduct" policies.
19. The physician's malpractice liability insurance application is rejected by the network's or network employer's malpractice insurance company or is cancelled by said company.
20. The physician's license to practice medicine in any state is suspended or terminated.
21. The physician fails to provide services consistent with the corporation's requirements, and he or she fails to correct such failure within 30 calendar days after written notice.
22. Physician's clinical privileges granted by any medical staff are restricted, limited, revoked or terminated.
23. The physician is convicted for commission of a felony.
24. The physician engages in conduct that conflicts with his or her obligations or duty of loyalty to the corporation or may otherwise cause damage to the reputation, goodwill or community standing of the corporation.
25. The occurrence of any event which constitutes grounds for termination of the physician under corporation policies including but not limited to failure to comply with the hospital partner's corporate compliance program.
26. Violation of Radiology of Indiana, PC's Code of Professional Ethics for any of the hospitals or healthcare organizations the group has admitting privileges at in the performance of their duties.
27. Deliberate deprivation of services to patients.
28. Failure to present oneself with appropriate professional dress or demeanor in dealing with patients, family members, hospital administration, or hospital employees.
29. Reporting to work under the influence of alcohol, intoxicants or controlled substances or possession of such substance on company property.
30. Knowingly causing false claims for healthcare services to be submitted to Medicare, Medicaid, or other payers.
31. Accessing confidential information without a need/right to know, divulging confidential information to unauthorized person(s), or removing or unauthorized disclosure of the contents of medical records (HIPAA).

32. Violation of any terms and conditions outlined in the Employment Agreement between the Physician and the Corporation wherein obligations of the physicians are expected to be fulfilled as a condition of employment.

PROGRESSIVE CORRECTIVE ACTION PROCESS:

Radiology of Indiana may choose to implement a progressive corrective action process to provide physicians an opportunity to improve performance or to correct conduct-related problems. Disciplinary action may call for any of four steps – documented verbal warning, written warning, final written warning (which may include suspension), or termination of employment, depending on the severity of the problem and the number of occurrences. Remediation by attending a “course” may also be requested depending on behavior concern. Circumstances (severity of incident) could dictate that one or more steps are bypassed in the progressive corrective action process.

Progressive discipline means that, with respect to most disciplinary problems, these steps will normally be followed:

1. Documented verbal warning
2. Written warning
3. Final written warning (with potential suspension)
4. Termination

Radiology of Indiana recognizes that there are certain types of problems that are serious enough to justify either a final written warning, with or without suspension, or, in extreme situations, termination of employment, without following the usual progressive corrective action steps. By using progressive corrective action, Radiology of Indiana believes that most issues can be addressed and corrected at an early stage, benefiting both the physician and the organization.

Radiologist Signature

Date

Radiologist Printed Name

2/1/2018	Effective								
1/9/2020	Reviewed								
3/30/2021	Reviewed								

Approved by:	Radiology of Indiana Board of Directors
	Human Resources