

**MEMORANDUM OF UNDERSTANDING
DISCIPLINE FOR VIOLATIONS OF UMHS PRIVACY POLICY**

House Officers are subject to the Michigan Medicine Discipline for Violations of Privacy or Security of Protected Health Information (PHI) or Other Sensitive Information for All Michigan Medicine Workforce Policy, 01-04-390 (the "Policy"). The following sanctions will be applied to House Officers for violations of this Policy, but the University reserves the right to accelerate discipline where aggravating circumstances exist, as further defined below.

Level 1 - Verbal Coaching or Verbal Warning with Documentation and re-education through Cornerstone Learning HIPAA training module (PRIV-C10001).

Level 2 - Verbal Warning with Documentation or Written Warning and re-education through Cornerstone Learning HIPAA training module (PRIV-C10001).

Level 3 – 2 to 5 days suspension without pay and re-education through Cornerstone Learning HIPAA training module (PRIV-C10001). The number of days shall be determined by Human Resources and the GME Program Director after the Privacy Violation Review Committee has reviewed the case and determined the Level of Violation

Level 4 – Termination of Employment

Aggravating and mitigating factors may be considered to determine the appropriate disciplinary action, except that mitigating factors shall not apply to Level 4 violations. Aggravating and mitigating factors may include, but are not limited to: Whether the House Officer took prompt and appropriate steps to mitigate harmful effects of a violation; whether the House Officer promptly and voluntarily reported the violation; and whether the House Officer was truthful or cooperated in the investigation.

This Agreement shall be effective May 1, 2023, and remain in effect through June 30, 2026. In the event the parties enter into a collective bargaining agreement beginning July 1, 2023, that extends beyond June 30, 2026, this Agreement shall remain in effect until the expiration of that collective bargaining agreement. During the term of this Agreement, in the event that the University notifies HOA of its intent to revise the disciplinary steps in the Policy for Non-Tenured Medical Staff, either party may reopen this MOU upon written request to the other party within thirty (30) calendar days of such notice by the University to the HOA.

For the University

By: Wade Baughman
Wade Baughman
Labor Relations Lead

Date: 5/2/23

For the HOA

By: Robin L. Tarter

Printed Name and Title:

Robin L. Tarter, Exec Director

Date: 5/2/23