

 	<b>POLICY</b>		
	EFFECTIVE DATE: <b>11-9-11</b>	REVIEW DATES:	SUPERCEDES: <b>6-9-10</b> <i>Version of Same</i>
SUBJECT: <b>UMMG Enforcement Policy</b>		RESIDING MANUAL:	
APPROVED BY: <b>UMMG Executive Committee</b>		PAGE NUMBER: <b>1 of 1</b>	<b>Policy #</b>

- I. **PURPOSE:** Ensure compliance with the provisions of all UMMG policies and mandatory tasks related to the Practice. To establish ultimate responsibility for enforcement, and define uniform enforcement actions. Establish the Chair's ultimate responsibility for maintaining compliance, and the authority to modify practitioner's activities, as required.
- II. **POLICY STATEMENT:** All UMMG members are responsible for complying with all UMMG policies. Each practitioner is accountable to his or her Chair for adherence to these policies and mandatory tasks. Lack of compliance will lead to uniform enforcement actions, without exception. Full disclosure of actions related to compliance with these policies is required.
- III. **DEFINITIONS OF ENFORCEMENT ACTIONS FOR LEVEL OF NON-COMPLIANCE:**
- ▶ **Unintentional and minor deviation from policy**  
Action: Verbal reprimand from department Chair or delegated supervisor.
  - ▶ **Subsequent unintentional deviation from policy**  
Action: Written reprimand from department Chair and warning that any further infractions will result in a fine.
  - ▶ **Intentional or flagrant or repeated offenses**  
Action: Minimum fine of 5% of monthly salary, based on previous 12-month average. Higher amounts will be imposed if deemed appropriate by the nature of the infraction. The CEO (or designate, CMO/COO) of the U Health Faculty Practice will be responsible for initiating this action as appropriate, in consultation with the respective Department Chair.
  - ▶ **Additional intentional or flagrant or repeated offenses; or significantly egregious offense**  
Action: Termination from medical staff, including relinquishment of clinical privileges or termination from employment, as deemed appropriate, in accordance with pertinent University/Faculty guidelines.
- IV. **SCOPE:** University of Miami Health System Department Chairs, VCAs, and practitioners, at all service locations.
- V. **RESPONSIBILITY:** Practitioners are individually responsible for compliance with these parameters, and will be subject to corrective action for such failures, as outlined above. Chairs, VCAs and their designees are responsible for ensuring compliance for their departments.
- VI. **PROCEDURES:**
1. The department Chair may request recommendations from the UMMG Executive Committee on which sanctions may be most appropriate, as individual issues arise.
  2. The Dean is ultimately responsible for ensuring that the Chairs enforce the policies, and for holding the Chairs accountable.
  3. All active UMMG policies and procedures are located at: <http://ummgadminresources.med.miami.edu/>