

Taconic IPA, Inc. (“TIPA”)

PHYSICIAN NONCOMPLIANCE WITH POLICIES AND PROCEDURES

1. In the event that TIPA, a physician or other person or entity believes that a participating physician (“Participating Physician”) has violated any of TIPA’s policies or procedures or the policies and procedures of any payor with whom TIPA contracts, TIPA’s CEO shall be responsible for investigating and evaluating such complaints and collecting information from all appropriate sources. The CEO may request the assistance of appropriate TIPA committees. If the CEO believes it is appropriate he may send a warning letter to the Participating Physician and may impose initial sanctions. Such warning or action shall be reported to the Designated Committee.
2. In the event that the source of the complaint about a Participating Physician is a payor’s Medical Director, (i.e. MVP’s Medical Director), said Medical Director shall provide the TIPA CEO, in writing: the name, address, and telephone number of the Participating Physician; the nature of noncompliance; and the steps taken to date.
3. If Participating Physician has previously refused a visit from the payor’s Medical Director or has met with the payor’s Medical Director but subsequently fails to initiate a corrective action plan, the TIPA CEO will initiate a meeting with the noncompliant Participating Physician to discuss the corrective action(s) required for Participating Physician to become compliant with the payor’s policies and procedures. A corrective action plan will be developed for implementation. The Participating Physician will be asked to acknowledge in writing Participating Physician’s understanding of his or her obligations and responsibilities pursuant to the corrective action plan. The TIPA CEO will provide the payor’s Medical Director with a copy of the plan within 30 days. The payor’s Medical Director will perform a six-month evaluation of Participating Physician to determine whether he or she is compliant at that time.
4. If the TIPA CEO determines that Participating Physician is not willing to meet or fails to institute a corrective action plan in order to become compliant, the CEO shall meet with the payor’s Medical Director to report such determination and to discuss potential sanctions and/or termination. The Participating Physician will be notified in writing of any resulting action pursuant to TIPA’s and the payor’s Policies and Procedures.
5. If information is reported which indicates that Participating Physician may have committed an act which clearly constitutes professional misconduct under applicable state law, the TIPA CEO’s investigation may include contacting the Office of Professional Medical Conduct of the Department of Health, and the president of the medical staff of any hospital at which Participating Physician has privileges.
6. In the event the TIPA CEO determines that Participating Physician’s conduct may pose imminent harm to patient care or there has been a determination of fraud or a final disciplinary action has been taken by a state licensing board or governmental agency that impairs the Participating Physician’s ability to practice, the CEO may immediately terminate the Participating Physician in accordance with TIPA Policies and Procedures.