

TACONIC IPA, INC. (“TACONIC”)

PHYSICIAN NONCOMPLIANCE WITH POLICIES AND PROCEDURES

1. In the event that Taconic, a physician or other person or entity believes Participating Physician has violated any of Taconic’s policies or procedures or the policies and procedures of MVP, Taconic’s President shall be responsible for investigating and evaluating such complaints and collecting information from all appropriate sources. The President may request the assistance of appropriate Taconic committees. If the President 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 MVP’s Medical Director, the Medical Director shall provide the Taconic President, 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 MVP’s Medical Director or has met with MVP’s Medical Director but subsequently fails to initiate a corrective action plan, the Taconic President will initiate a meeting with the noncompliant Participating Physician to discuss the corrective action(s) required for Participating Physician to become compliant with MVP’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 Taconic President will provide MVP’s Medical Director with a copy of the plan within thirty (30) days. The MVP Medical Director will perform a six (6) month evaluation of Participating Physician to determine whether he or she is compliant at that time.
4. If the Taconic President determines that Participating Physician is not willing to meet or fails to institute a corrective action plan in order to become compliant, the President shall meet with MVP’s Medical Director to report such determination and to discuss potential sanctions and/or non-renewal or termination. The Participating Physician will be notified in writing of any resulting action pursuant to Taconic’s and MVP’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 Taconic President’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 Taconic President 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 President may immediately terminate the Participating Physician in accordance with Taconic’s Policies and Procedures.