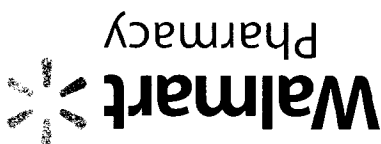




POM 206
VCOG 217
Professional Accountability Matrix
 Health & Wellness Compliance

	Infraction	Supporting Policy or Resources in addition to Standards of Behavior (linked through POM 1712 or VCOG 1109)	Accountability for First Offense
1	Blatantly disregarding Standard Operating Procedures (SOP) including negligence and/or disregard for patient safety.	POM 1102 POM 1001-1031 VCOG 001 VCOG 002 VCOG 003 POM 1014	Termination
2	Knowingly or intentionally practicing, directing, or allowing any professional (including a pharmacist, technician, associate optometrist, optician, apprentice, intern) to practice or perform duties without a valid, required license/registration or without required supervision.	POM 203 POM 205 POM 1303 POM 1321 VCOG 1502 VCOG 1513 POM 1014	Termination
3	Knowingly or intentionally mislabeling or misbranding prescription medication*, prescription spectacles, or contact lenses. Knowingly or intentionally providing inaccurate or misleading information about the quality or nature of prescription medication*, prescription spectacles, or contact lenses being sold or dispensed. Knowingly or intentionally dispensing expired prescription medication*, contact lenses (retail or diagnostic / trial lenses), or contact lens cleaning solutions. Knowingly or intentionally administering expired prescription medications, immunizations/vaccinations (applicable to pharmacists and Care Clinic associates), or diagnostic drops (applicable to Associate Optometrists) to a patient.	POM 203 POM 205 POM 1303 VCOG 001 VCOG 002 VCOG 003 VCOG 1102 VCOG 1514 POM 1014 Storing and Handling Immunizations	Termination
4	Dispensing prescription drugs*, spectacles, or contact lenses from a prescription that the associate knew was forged or fraudulent, including, but not limited to, sting operations as described in POM 1703.	POM 1703 VCOG 1505 POM 1014	Termination
5	Filling and/or refilling prescriptions for drugs, spectacles, or contact lenses without prescriber authorization. This does not include the exercise of professional judgment in order to provide appropriate continuation of therapy in emergency or	POM 205 POM 1309 VCOG 1509 VCOG 1514	Termination





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	after-hours situations as allowed by state practice acts, provided that the Connexus emergency fill process is used.		
6	Buying, trading, or obtaining any merchandise, including but not limited to prescription medications, spectacles, contact lenses, contact lens cleaning solutions, or medical devices, from an unauthorized supplier or source.	POM 810 VCOG 1515	Termination
7	Knowingly or intentionally altering or submitting inaccurate prescription information in order to obtain payment for prescriptions*, including OTC products, spectacles or contact lenses. Knowingly billing for prescription, immunization or optical services not provided, or products or services not provided at the time of the service or sales transaction.	HW-01 POM 203 POM 1202 POM 1205 POM 1711 POM 1712 POM 1704 POM 1804 POM 1014 VCOG 1106 VCOG 1109	Termination
8	Intentionally failing to report a prescription event.	POM 1102	Termination
9	Failing to secure the pharmacy (as defined in POM 902) while exiting the building. Technicians or other non-pharmacists were allowed to remain in the pharmacy, while no pharmacist was present.	POM 902	Termination
10	Failing to secure the pharmacy (as defined in POM 902) while exiting the building. Technicians or other non-pharmacists were removed from the pharmacy.	POM 902	Minimum of 2 nd Written Coaching up to and Including Termination
11	Failing to secure the pharmacy (as defined in POM 902) while remaining in the building. Technicians or other non-pharmacists were allowed to remain in the pharmacy, while no pharmacist was present, for the purpose of shopping or other non-business related activities.	POM 902	Minimum of 2 nd Written Coaching up to and Including Termination
12	Failing to secure the pharmacy (as defined in POM 902) while remaining in the building. Technicians or other non-pharmacists were allowed to remain in the pharmacy, while no pharmacist was present, for the purpose of performing unapproved business activities outside of the pharmacy area. Pharmacists may exercise professional judgment to assist Customers/Members in OTC product selection in areas that briefly obstruct view of pharmacy.	POM 902	Progressive Coaching



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	Infraction	Supporting Policy or Resources in addition to Standards of Behavior (linked through POM 1712 or VCOG 1109)	Accountability for First Offense
13	Failing to secure the pharmacy (as defined in POM 902) while remaining in the building. Technicians or other non-pharmacists were removed from the pharmacy.	POM 902	Progressive Coaching
14	Allowing visitors (i.e., friends or family members, or those without a legitimate business reason) inside the licensed pharmacy space.	POM 902	Progressive Coaching up to and Including Termination
15	Failure to act, by any professional, supervising associate, or Pharmacy Manager / Vision Center Manager / Optical Manager, which results in any professional (including but not limited to a pharmacist, technician, associate optometrist, optician, apprentice, or intern) practicing, directing, or being allowed to perform duties without a required license/registration*, on an expired license/registration, or without required supervision.	POM 203 POM 205 POM 1303 POM 1321 VCOG 1502 VCOG 1513	Minimum of 2 nd Written Coaching up to and Including Termination
16	Blatantly disregarding any section of the Vision Center Operations Guide (VCOGs) or the Pharmacy Operations Manual (POMs), excluding POM 1000 (refer to Infraction #1) or VCOG 001, 002, or 003.	All Sections of the POMs or VCOGs, except POM 1000 or VCOGs 001, 002, or 003	Progressive Coaching up to and Including Termination
17	Failure by the discovering pharmacist to report a prescription event within required timelines (day of discovery).	POM 1102	Progressive Coaching
18	Failing to complete a plan of action within the required timeline as specified in the Just Culture Program documentation following the task notification to complete.	Just Culture QI Program Documentation	Progressive Coaching
19	Failing to report any suspected HIPAA breach by close of business on the day of discovery.	POM 1625 VCOG 1625 POM 1102	Progressive Coaching up to and Including Termination
20	Inappropriately referring a patient (or patients) to a Health Care Business, or providing Support Services to a Health Care Tenant without a contractual relationship and compensation for such Support Services. [<i>Capitalized terms are defined in the relevant policies.</i>]	HW 01 VCOG 1506	Progressive Coaching
21	Failing to maintain records according to HW records procedures inclusive of failure to obtain, retain or transmit patient-critical information prior to administering an immunization.	POM 1306 VCOG 1110 POM 1014	Progressive Coaching
22	Administering immunizations in a non-approved off-site administration site		Termination
23	Inappropriate use or disclosure of patient information for solicitation of immunizations	POM 1624	Progressive Coaching



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	Infraction	Supporting Policy or Resources in addition to Standards of Behavior (linked through POM 1712 or VCOG 1109)	Accountability for First Offense
24	Self-administration of immunization	POM 205	Termination
25	Intentionally using, accessing or disclosing PHI in violation of HIPAA	1600 series POMs 1600 series VCOGs	Minimum of 2 nd Written Coaching up to and including Termination
26	Unintentionally using, accessing or disclosing PHI in violation of HIPAA	1600 series POMs 1600 series VCOGs	Retraining and/or progressive coaching

**References to prescriptions or prescription drugs/medication and required licensure include the immunization program.*

This matrix is intended to complement the Operational Compliance Accountability Matrix established by Corporate Compliance. Each infraction will be reviewed independently and the level of discipline imposed may vary from the "First Offense" column of the chart depending on the severity of the infraction and other relevant circumstances. This list is not all-inclusive and associates may be disciplined for any reason consistent with applicable law and company policy. This matrix does not create an express or implied contract of employment or any other contractual commitment. Wal-Mart may modify this matrix at its sole discretion without notice, at any time, consistent with applicable law. Employment with Wal-Mart is on an at-will basis, which means that either Wal-Mart or the associate is free to terminate the employment relationship at any time for any or no reason, consistent with applicable law.

