Statements by Dr. Maryann Turley, Defendant's Chief Medical Information Officer

"Dr. Maryann Turley described issues with training and said she would not be surprised if someone was falsifying the assessment tests."

(Attachment A; Defendant's Supp. Disclosure July 11, 2018; HH002662)

"She [Turley] stated that she believes there are still instances where personal passwords and login passwords are shared, even though it is strongly discouraged it's hard to prevent."

(Attachment A; Defendant's Supp. Disclosure July 11, 2018; HH002663)

Statements by Dr. Stephanie Jackson, Defendant's Chief Quality Officer

"I believe that Robert Barron likely did raise valid concerns about the quality of the Epic training classes. Regarding the sharing of passwords and login's, efforts have been made to eliminate the practice of sharing passwords to correct the Help Desk issues and practice of asking for passwords and improving the Epic training.

(Attachment A; Defendant's Supp. Disclosure July 11, 2018; HH002664)

Interrogatory No. 7

(Stephanie Jackson) At your meeting with the Plaintiff regarding his post termination appeal, did you state that HonorHealth's IT Dept. had stopped asking physicians for their personal login information over the phone after Plaintiff's report of this practice?

Response

HonorHealth's internal policies prohibit the sharing of personal login information. Plaintiff was informed that efforts were being made to eliminate the practice.

(Exhibit K; Defendant's Supp. Response to Interrogatories March 23, 2018; P.5 at 17-23)

Email by Jonathan McMahon, Defendant's IT Training Manager

"It's also been brought up that at times the Service Desk has asked an end user for their password over the phone. I've been on the receiving end of this myself years ago. As you know, this is a department that is under new management and is growing. Michelle communicated this with their director and the following response was given; "If someone asked you for one, I would appreciate the name of the agent so we can coach."

(see Plaintiff's SAC; Exhibit P)