



**MOBILE HEALTH TEAM**  
HEALTHCARE STAFFING

# Policies and Procedures

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## **Introduction to Mobile Health Team Inc.**

Thank you for choosing Mobile Health Team Inc. Mobile Health Team is a growing Staffing agency, that seeks to provide top staffing solution in the healthcare system.

Our goal is to provide the best Healthcare team members for our clients and that means we support our Healthcare employees in growing and building on their skills. To reach our goal we must provide superior service to our customers and this means employing the best people. As a member of Mobile Health Team, you are critical to our success.

Mobile Health Team focuses on creating an exciting, challenging and rewarding work environment that allows you to flourish. As a versatile company, we offer many job opportunities. We strive to build with you, a long and successful association with Mobile Health Team.

Once again, welcome to Mobile Health Team. We appreciate you and look forward to a lasting relationship .

Kind regards,

*Mobile Health Team Inc.*

## **History**

Mobile Health Team strives to be the top staffing agency in the United States and Africa. Our headquarters are based in the United States of America in the city of Chicago, Illinois. Since 2015, we have made a commitment to serve the community and its healthcare facilities by providing a solution to their staffing need. If you are looking for temporary or long term employment, we are here to help.

## **Goals**

**At Mobile Health Team Staffing the success of our employees is our passion.** We strive to have the highest company standards and ethics in the area.

## **Right to Change or Discontinue**

This handbook is not to be construed as an employment contract nor is any other company document to be taken as such. I understand that if I accept employment with Mobile Health Team that all job assignments will be of temporary nature, and that I am not guaranteed any full time permanent employment. Mobile Health Team Staffing job assignments range from “temporary only” to “temp to screen” which means that employer will screen the temporary before hiring them permanent; this also means that the temporary work is not guaranteed employment with that client. I understand that my employment with Mobile Health Team Staffing is at will which may be terminated without notice or cause.

Mobile health Team Staffing reserves the right to revoke, change, or supplement these guidelines at any time without notice. Such changes shall be effective immediately upon approval by management unless otherwise stated.

No policy is intended as a guarantee of continuity of benefits or rights. No permanent employment or employment for any term is intended or can be implied by statements in this manual.

All employees are employed at will. This means they can be terminated at any time for non-discriminatory reasons.

## **POLICY's AND PROCEDURES**

Our clients appreciate the personalized service our experienced Healthcare professionals offer. The assignments offered to our employees are challenging, interesting, and rewarding!

Use this folder as your Agency Handbook. It will help create a long-lasting, mutually beneficial relationship between Mobile Health Team and you. If you have any questions, your recruiter will be happy to assist you.

### **Responsibility of Accepting an Assignment**

Mobile Health Team asks that you accept only those assignments you are certain that you will fulfill. Understandably, there are times when unforeseen emergencies occur which will necessitate your cancelling an assignment. If this happens, call your recruiter as soon as possible so that we can make other arrangements. Our telephone lines are open 24 hours a day for you to leave a message. If you fail to report to your assignments or cancel at the last minute without notice or good reason, Mobile Health Team staffing will not call on you again with new assignments.

### **Appearance, Attitude, Absenteeism, and Lateness**

Please keep in mind that you are a representative of our agency. When reporting to each assignment, be sure to be on time. If you cannot report to work, call Mobile Health Team main line immediately. If you are going to be late, always let us know so that we can inform the facility. Remember, never call the facility directly. All communications must be through Mobile Health Team Staffing. While at the client facility, maintain a pleasant, courteous, and positive attitude, and always look your best.

### **Being Hired on a "Permanent Basis"**

If one of our clients wishes to employ you on a direct-hire (permanent) basis, you must notify your recruiter immediately. Please specify that you are requesting permission to convert from temporary to full-time. We will contact the client and arrange for your employment conversion and release.

### **Stay in Touch**

After the completion of each assignment, your recruiter will call you to inquire of your availability. We will reassign you at that time or will call on you in the future with a new assignment. This is very important for you to remember in order to receive new assignments.

### **Emergencies**

If there is ever a medical emergency, accident, or injury sustained while on the job, be sure to report it directly and immediately to your recruiter.

### **Payroll**

One payroll check is issued weekly. You will be paid for all approved hours. This excludes meal breaks. Any overtime hours must be approved by your recruiter in advance. We will deduct only mandatory income taxes, social security, and other city, state, and federal deductions as required by law.

Please use only one timesheet for each assignment during a week. For example, if you work two days at one facility and three days at another, you will need to have two completed, approved, and signed timesheets, i.e. one for each facility.

In order to be paid in a timely fashion, your signed and approved timesheet must be turned in by our specific deadlines. Your check will be direct deposited into the bank account of your choice. If permitted by the recruiter, your time slip may be faxed back to the office.

Mobile Health Team is your employer. You are paid by us. There is never a fee or registration charge to our temporary staff.

IMPORTANT: There are certain subjects that you should not discuss with anyone other than your Mobile Health Team recruiter. These include: your hourly pay rate; your home address; your telephone number. This information is strictly confidential.

## **EMPLOYMENT GUIDELINES AND AGREEMENT**

Mobile Health Team is dedicated to providing the community with the highest level of healthcare professionals capable of performing in the most competent, professional, and reliable manner. The following information is provided to assist you in understanding Agency requirement and procedures. If you have any questions during or following the interview process, please speak to your Mobile Health Team Recruiter, who will be happy to assist you.

### **APPLICATION INFORMATION**

All information supplied by the applicant for employment with Mobile Health Team is expected to be factual and accurate. If there are any misrepresentations or over exaggerations of any information provided on the application the applicant will not be considered for employment and if discovered after this will be a ground for immediate discharge.

### **INTERVIEW**

Upon receiving the applicant's application, a Mobile Health Team Recruiter will perform an interview with candidates. Upon interest in an assignment, the unit manager or Staffing manager may request an interview with the applicant.

### **BACKGROUND CHECKS**

Mobile Health Team will conduct an investigation of the applicant's background. The background investigation may include contacting the applicant's references, inquiries about conviction record. No credit history checks will be performed. Criminal background checks will be done according to the state law in which temporary employment will be obtained through Mobile Health Team. This includes inquiry with state and county police departments, OIG, GSA, Sex Offender list and state licensing boards. This background will be updated upon client facility request.

### **REQUIRED CREDENTIALS AND DOCUMENTATION:**

Every Healthcare professional is required to have a minimum of one-year experience in their field. Additional year of experience required will vary based on the assignment and the clients request. Healthcare professionals must be proficient and knowledgeable in the area in which they plan to work in through this agency.

Prior to beginning any assignment, the following documentation must be on file with Mobile Health Team. Requirements may vary by position and/or state.

#### ***State Licensure/Certification***

Proof is necessary for each state in which a candidate may practice. Original documentation must be verified by a representative of Mobile Health Team.

#### ***CPR Certification by American Heart Association as required by areas assigned (ACLS, BLS, PALS, TNCC)***

BLS is mandatory for everyone, advanced certification as required for designated areas.

#### ***Physical Examination***

Yearly physical exam is required and may include results of the following:

**Annual Mantoux (TB) is required or proof of chest x-ray**

Immunity to Mumps or Measles,  
Immunity to Rubella/Rubeola, Immunity to Varicella,  
Hepatitis Screening/Immunization or Waiver  
Flu shot immunization

### ***Professional References***

References must document recent, relevant clinical experience, and be provided by candidate's direct supervisor, coworker and charge nurse. If a candidate is seeking placement in more than one clinical area, a reference is required for each specialty.

### ***Successful Completion of Nurse Tests and/or a Skills Checklist***

IT IS YOUR RESPONSIBILITY TO PROVIDE CURRENT, VALID CREDENTIALS AND OTHER REQUIRED DOCUMENTATION TO MAINTAIN ACTIVE EMPLOYMENT WITH MOBILE HEALTH TEAM.

### **SCHEDULING AND RECONFIRMATION:**

Employees of Mobile Health Team are selected not only for their high standards and professionalism, but also for their personal integrity and individual commitment. Your responsibility to honor your work commitment is essential to the continued success of both your professional career and your relationship with New Solutions Staffing. Accordingly, it is expected that you carefully plan the dates and times you are available to work so that cancellations do not occur.

Once your date of availability is submitted to the specific facility consider yourself committed to the date of availability given once a confirmation email or text has been sent to you.

Should a facility wish to schedule with you directly while you are on assignment, by all means, secure the next opportunity for yourself. However, it is imperative that you notify us of any such bookings so that we can assure payment for your services. This is especially true if you provide services to more than one Agency facility. Make sure your recruiter has not scheduled you on another assignment.

### **TIMESHEETS AND PAY:**

Mobile Health Team employees are paid each week contingent upon the proper and timely completion of Mobile Health Team timesheet. Unsigned or improperly completed timesheets may result in the delay of your paycheck. The two methods of submitting your payroll information are an individual timesheet or Agency Staffing's Sign-In Book, located at the facility (usually at the nursing office).

- **Individual Timesheets**

It is your responsibility to have your timesheet approved with signatures and emailed to our office by the weekly deadline to assure timely payment each week.

- **Agency Sign-In Book** For RNs, LPNs, CNAs, and other healthcare professionals performing shift assignments, Mobile Health Team Staffing's Sign-In Book may be used to record your payroll information. This sign-in book contains sign-in sheets where you must sign and out for each shift you work. In addition, you will be asked to log any breaks, the Unit/Department where assigned, and if you worked overtime or through your break. A supervisor's signature is required.

It is absolutely essential to sign in upon your arrival and sign out upon your departure. Failure to do so may result in delay of your paycheck. In the unlikely event that the sign in book is not available to you, especially at the time of departure, contact the nursing supervisor for assistance. If help is not available, call Mobile Health Team.

The sign-in sheet is forwarded to Mobile Health Team for payroll processing. For your record It is necessary for you to submit an individual time sheet.

**IMPORTANT:** There may be instances when a facility will require both an individual timesheet and the Sign-In Sheet. You will be advised at the time of your assignment if you must do both.

### **RULES WHILE ON ASSIGNMENT:**

Mobile Health Team supplies temporary staff to a wide range of healthcare facilities with varying requirements and procedures. At the time of assignment, your recruiter will review any specific facility requirements with you. The information below explains Mobile Health Team guidelines while on assignment.

#### **Orientation:**

Orientation requirements and reimbursement vary according to each facility. Some require that you read and study their Orientation Guidelines prior to your first assignment. Included will be an acknowledgment form for you to sign, attesting that you have read and understood the material. This form must be brought with you at the time of your first assignment. Your Recruiter will explain the process to you. Other facilities will require you to either attend their orientation program at their site or virtually.

#### **Presentation of Credentials:**

Most healthcare facilities require you to bring your CURRENT ORIGINAL registration and an acceptable form of ID each time you are scheduled to work. Should you arrive without these documents, the facility has the right to refuse your services. This will be deemed a late cancellation on your part and will be subject to review.

#### **Identification and Attire:**

Most healthcare facilities and all hospitals require an Agency ID badge or facility ID badge to be worn while on assignment. If you have not received your ID badge by the time of your first shift, please bring another form of photo identification with you to the facility. Unless otherwise informed, your attire shall consist of a clean, neat, standard uniform. Your uniform should always be in compliance with the dress code for that facility and clinical area. If you are unsure of what to wear, please ask your Recruiter.

#### **Shift Time and Breaks:**

Shift times and breaks vary according to the policies of each facility. If you will not be getting your break or expect to work additional time, notify the supervisor/charge nurse immediately. The supervisor/charge nurse will either relieve you or authorize additional time. Any additional time will be paid only if authorized by a nursing supervisor via a signature on either your timesheet or in Mobile Health Team sign-in book.

#### **Call your Mobile Health Team immediately if:**

- You anticipate being late or will be unable to keep your commitment to work.
- You arrive at the facility and are told you are not scheduled to work and/or are asked to go home. PLEASE DO NOT LEAVE THE FACILITY PRIOR TO CONTACTING US.
- You are at a facility and you are asked to:
  - Float to an area outside your expertise
  - Take charge without prior knowledge or consent
  - Take what you believe to be an unsafe patient assignment
  - Move mid-shift to another unit within your clinical area without prior planning or notification
  - An occurrence (incident) occurs
- If you have arrived at the facility for the beginning of your scheduled shift and that shift is cancelled, please call your recruiter or the on-call Coordinator immediately while you are at the facility.



## STANDARDS OF CONDUCT

Mobile Health Team has always insisted that our temporary staffing employees maintain the highest standards of ethical and professional business behavior. In all dealings with our clients, the public, and with each other, all temporary staffing employees on assignments are expected to perform their duties with the highest degree of honesty, integrity, loyalty, and dedication to Mobile Health Team and its clients.

Mobile Health Team has developed some particular policies and rules for this end. Temporary staffing employees on assignment who engage in any of the following enumerated conduct, or in any other actions or omissions that Mobile Health Team determines to be contrary to its standards of acceptable conduct or to otherwise be inappropriate, shall immediately be deemed ineligible for future assignments. Please read the following and ask your Coordinator any questions that you may have.

1. If you are insubordinate or demonstrate a lack of cooperation
2. If you fail to either cancel (with as much notice as practical) or appear when scheduled at any two assignments
3. If you fail to submit required I-9 documentation before the start of your first assignment
4. If you receive two sub-standard client performance evaluations
5. If you have three unsatisfactory reasons for lateness or absences
6. If you fail to successfully and/or satisfactorily complete two or more assignments
7. If you cause any type of disruption at a client's worksite (e.g. harassment, fighting, theft)
8. If you are released by one or more clients for behavioral reasons on two occasions and one incident is extreme or serious, as determined by Mobile Health Team, you will be deemed ineligible for future assignments based on that single incident.

Determinations of violations of the foregoing rules will be based upon objective evidence, credibility determinations, and the client's recitation of the facts and other criteria Mobile Health Team deems credible and relevant. The above lists set forth examples of behavior that will result in automatic ineligibility for future assignments. This list is not intended to be all inclusive.

## Evaluation

### Employee evaluation

Mobile Health Team will perform an annual performance evaluation of its employees in order to provide a dialogue between the client supervisor and the employee, and also to make sure job requirements and goals are met.

Upon completion of an assignment an evaluation of the employee will be performed by the unit manager of the unit employee was assigned. A negative evaluation depending on the circumstances can result in probation, discipline, or dismissal.

### DNR Policy

If the client feels that the healthcare professional is not meeting their policy's, they have the right to request the healthcare professional not to return. Upon this request from the client, Mobile Health Team will make sure that the employee understands the reason for being placed on a Do Not Return list by the facility. If the employee gets listed as a DNR at more than one facility, Mobile Health Team reserves the right to terminate an employee at any time.

## **THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA)**

One of the hottest issues in Compliance is the Health Insurance Portability and Accountability Act, known as HIPAA. The government is very serious about healthcare providers and their employees complying with HIPAA. Failure to follow the HIPAA rules can result in serious fines and employees can even be sent to jail for merely looking at a medical record they were not authorized to view.

In 2013, HIPAA was strengthened by the adoption of additional laws. All healthcare providers are now required to notify the federal government when confidential patient information is accessed, used, or disclosed improperly, unless the healthcare provider can demonstrate that there is a low probability that the protected health information was compromised. This is a much stricter standard than in years past. The fines and penalties for violations of HIPAA can be enormous – up to \$1.5 million per violation.

The media routinely publicizes instances where patient data is lost, stolen, or otherwise improperly acquired. For example, a Florida Emergency Department staffer was sentenced to 12 months in federal prison for inappropriately accessing 760,000 electronic health records and then stealing and selling information about motor vehicle accident patients to an individual co-conspirator, who then used the data to solicit legal and chiropractic businesses. These media reports hurt healthcare providers' reputations.

### **The HIPAA Privacy Rule**

The HIPAA Privacy Rule puts restrictions on the uses and disclosures of protected health information (PHI). PHI is all individually identifiable information about a patient's healthcare services or payment rendered for those services. PHI comes in many forms, including oral, written, and electronic. Any communication of PHI is covered by HIPAA.

Examples of PHI include, but are not limited to:

the patient's name

the patient's social security number

the patient's diagnosis or information about the medical treatment the patient received

the physician's personal notes on a patient

the patient's billing information (including health insurance carrier)

- the patient's date of birth

There are many other types of data that are PHI. Think about your own job. What types of PHI do you work with? What steps do you take to safeguard your patients' PHI?

The Privacy Rule also gives patients certain rights with respect to their PHI. These rights are:

The right to access, inspect, and copy a patient's own medical records, including the right to obtain an electronic copy of the medical record if it is maintained electronically by the health system

The right to request restrictions on the release of a patient's medical records, including disclosure restrictions to a health insurer when a patient pays out-of-pocket for his/her medical treatment

The right to opt out of the patient directory while in the hospital

The right to request an accounting of the disclosures made of the patient's medical records to outside entities

The right to request an amendment of his or her medical records and to receive a response to this request within 60 days

The right to receive a Notice of Privacy Practices at the first treatment encounter or by request

The right to request and receive confidential communications concerning their PHI by alternative means

The right to file a complaint with the Office for Civil Rights of the US Department of Health and Human Services if HIPAA is violated

The right to be notified if the privacy of his/her protected health information has been breached, as defined by HIPAA

### **The "Minimum Necessary" Rule**

HIPAA has a "Minimum Necessary" Rule regarding PHI. This rule states that when you are using or disclosing a patient's PHI, you must use or disclose only the minimum amount necessary to achieve the purpose of the use or disclosure. For example, if you receive an inquiry regarding a patient's bill from an insurance carrier, you only need to disclose the patient's PHI that relates directly to the inquiry. The patient's entire medical record does not need to be disclosed.

### **Use and Disclosure of PHI**

PHI may be accessed, used, or disclosed only when specifically permitted by HIPAA. All other uses or disclosures are prohibited.

It is important to note that PHI may always be used for treatment of a patient. No authorization or consent by the patient is required for this use. The Minimum Necessary Rule discussed above does not apply to the use of PHI for treatment. Generally, the Privacy Rule permits disclosure of PHI to an individual who is involved in the patient's care, so long as the patient does not object to this disclosure.

In general, PHI also can be used to obtain payment for healthcare services rendered to the patient, for healthcare operations, when requested by the patient, or when required by law. The law does contain some exceptions to these general rules, so be sure to contact the division of Corporate Compliance within the facility you are working or your immediate supervisor with any questions.

Remember that the rules about PHI include verbal or spoken PHI. Do not discuss PHI where you can be overheard by others. Try to move to a more private location before discussing it.

Finally, it is important to always dispose of PHI properly. This means shredding it and disposing of it in locked bins. Do not throw out paper containing PHI in regular wastebaskets or dumpsters.

If you follow these steps, you will help to keep patients' PHI safe. PHI can be used for research. However, it can be used only with the approval of a Health System-authorized Institutional Review Board (IRB) and with either informed consent and authorization, a waiver of informed consent or authorization, or under a data use agreement as determined by the IRB.

Finally, the 2013 HIPAA regulations also included several changes that affect the use and disclosure of PHI. For example, medical providers can now release the immunization records of patients enrolled in educational institutions that are required by the state to have such information, as long as the provider obtains permission for the release of the records from the patient or from the patient's parent or guardian, if the patient is under 18 years of age. The law no longer requires the medical provider to obtain written permission before the information can be released. Similarly, PHI may now be released to family members and others who were involved in the care, or payment for care, of a deceased patient prior to death, unless doing so is inconsistent with any prior expressed preference of the deceased patient that is known to the Health System. These changes in the regulations were meant to make it easier on patients and on family members or individuals involved in the patient's care to access the patient's PHI.

Not all of the regulations released in 2013 made it easier to disclose PHI. Many of the regulations actually made it more difficult for medical providers to use or disclose PHI without written authorization from the patient. For example, the new HIPAA regulations place severe limitations on the ability of medical providers to sell PHI or to use PHI for marketing purposes. As a result, the health system has a general prohibition against selling the PHI of patients, and it will only do so in very limited circumstances if it has a prior written authorization from the patient. The Health System must also obtain a patient's authorization using a HIPAA-compliant authorization form before using or disclosing the individual's PHI for Marketing purposes. Healthcare staff should speak to a supervisor or the facility's division of Corporate Compliance if they have any questions about the sale or marketing of a patient's PHI.

### **The Security Rule**

The HIPAA Security Rule protects electronic PHI and sets standards for the electronic transmission of PHI. The Security Rule provides three types of safeguards:

1. The administrative safeguards set limits on who may access PHI electronically. It also requires detection systems to detect and prevent security breaches and ongoing evaluations and audits of computer systems' security.
2. The physical safeguards required by the Security Rule include facility access controls, such as ID badges, which must be worn at all times. The Security Rule also requires device and media controls to track hardware.
3. The technical safeguards include software to monitor for viruses, the encryption of data, and system tracking of logon attempts. It is important that all healthcare workers in a facility have a basic understanding of the technical safeguards as they help the facility reduce the risk to electronic protected health information or ePHI.
  - **Access Control:** Everyone must have a unique ID and password and should never share it. Electronic Access: Electronic records must be accessible at all times.
  - **Automatic Logoff:** After a certain period of inactivity, system should force a logoff.
  - **Audit Controls:** The ability to see who has accessed the patient's record.

- **Integrity:** System checks to ensure no data has been manipulated either unintentionally or by an unwanted source.
- **Person or entity authentication:** You are who you say you are (password, token, or both). Encryption protecting PHI at rest: Data is encrypted while stored where appropriate and reasonable.
- **Encryption in transit:** Data is encrypted while being transmitted.

The healthcare facility's Health Systems are always working hard to ensure the security of data through these safeguards and others.

### **Protecting ePHI**

Everyone in the healthcare facility is responsible for protecting PHI, whether it's contained in a written document, stored on a portable device or a computer, or spoken about between employees in an appropriate context. Each facility's HIPAA policies help everyone do this by informing employees about the safeguards and procedures that must be utilized to secure PHI. For example, most healthcare facilities have a policy regulating the use of portable devices containing PHI.

Computer users must actively protect all facility computers from loss or theft. It is very important that all employees keep track of their equipment and storage devices. Computers should be locked whenever not in use.

Employees should never leave a computer or any device containing PHI – or paper PHI – in a car overnight. The computer, device, or files should be removed from the visible areas of the car during short stops. It only takes a minute for a thief to break into a car and take the PHI.

All computers and mobile devices must be password protected, and a screensaver should be used whenever possible in accordance with the healthcare facility's policy. Employees should store all documents containing PHI on network drives, not on their computer hard drive.

### **Email and Social Networks**

Email, social media networks, and programs such as Instant Messenger can be as fun as they are useful. However, you must be extremely careful when using them in the workplace or when referencing the workplace.

The basic principles for using your work-based email are:

- Use your workplace email for work-related business only.
- Do not forward workplace emails to a personal email account.
- Make sure that your emails are professional in all respects.
- Email communication with patients or about patients must be treated with the same confidentiality as the written or electronic medical record.
- Emails that contain a patient's PHI must have the word "secure" or the term "PHI" in the subject line.
- A patient's PHI should never be included in the subject line as that does not get encrypted.

- The special rules for email communication with patients, such as patient consent and encryption, must be followed at all times.
- If you are not sure how to encrypt emails at your location, please call the help desk in your facility.

### Facebook and Twitter

Increasingly, Facebook and Twitter are becoming a vehicle for business and personal communication. The facility's confidentiality policy and HIPAA privacy rules apply equally to anything posted on Facebook or Twitter that is patient health information or confidential business information.

Absolutely no facility health system information should be posted on your personal Facebook account or any other similar social media sites. This includes protected health information, stories about things that happened in the workplace, and confidential business information. Even if it seems harmless or doesn't identify the patient, you cannot put any health system information on your personal Facebook or Twitter pages. Think before you act. Protect patient privacy and protect the health system's confidential business information.

### **Health System Business Information and Employee Data**

In addition to PHI, please remember that all health system business information, which includes employee personal data, should be treated as confidential at all times. You should only use this information when you are required to do so for your job. You should never use health system information for personal gain or for any other unauthorized reason.

### **Breach Notification**

One of the most important developments under HIPAA is the updated breach notification requirement. Beginning in 2011, certain kinds of improper disclosures of PHI must be reported to the federal government and the affected patients must be notified of the breach. "Breach" is defined as "an unauthorized acquisition, access, use or disclosure of unsecured, unencrypted protected health information which violates the HIPAA Privacy Rule and compromises the security or privacy of PHI. An impermissible use or disclosure of protected health information is presumed to be a breach unless the covered entity or business associate, as applicable, demonstrates that there is a low probability that the protected health information was compromised."

Anyone associated with the health system who becomes aware of a breach or even a potential breach must notify their immediate supervisor and the facility's division of Corporate Compliance immediately. Compliance and the Legal Affairs division will take the lead in making the determination as to whether the breach must be reported to the government and whether the affected patients need to be notified.

No one other than the Compliance and Legal Affairs should attempt to make this determination or conduct an investigation into the alleged breach. Your responsibility is to notify Corporate Compliance as soon as you become aware of the potential breach. Compliance and Legal Affairs, along with any other appropriate departments, will handle the rest of the matter.

**Duty to Report Compliance Violations**

All facility health system employees have a duty to report compliance-related violations. These include: HIPAA, coding and billing issues, EMTALA violations, theft of company assets, Stark and Anti-Kickback violations, gift issues, and violations of the Code of Ethical Conduct and the Health System's policies and procedures.

There are a number of ways that you can report violations. You can report to your supervisor, to the facility's division of Corporate Compliance, or to the Compliance Helpline (if available). In addition, be sure to report all violations to your staffing agency.

## **Equal Opportunity Policy**

Mobile Health Team is an Equal Opportunity Employer. It is the policy of Mobile Health Team to ensure equal employment opportunities in all personnel actions taken. Therefore, selection and other employment related decision will be made without regard to an individual's race, religion, color, national origin, sex, age, disability or other legally protected status.

### **A Summary of Your Rights Under the Fair Credit Reporting Act**

The federal Fair Credit Reporting Act ("FCRA") promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Here is a summary of your major rights under the FCRA. For more information, including information about additional rights, go to [www.ftc.gov/credit](http://www.ftc.gov/credit) or write to: Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

- You must be told if information in your file has been used against you.
- Anyone who uses a credit report or another type of consumer report to deny your application for credit, insurance, or employment – or to take another adverse action against you – must tell you, and must give you the name, address, and phone number of the agency that provided the information.
- You have the right to know what is in your file. You may request and obtain all the information about you in the files of a consumer reporting agency (your "file disclosure"). You will be required to provide proper identification, which may include your Social Security number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:
  - a person has taken adverse action against you because of information in your credit report;
  - you are the victim of identity theft and place a fraud alert in your file;
  - your file contains inaccurate information as a result of fraud;
  - you are on public assistance;
  - you are unemployed but expect to apply for employment within 60 days.
  - In addition, by September 2005 all consumers will be entitled to one free disclosure every 12 months upon request from each nationwide credit bureau and from nationwide specialty consumer reporting agencies. See [www.ft.gov/credit](http://www.ft.gov/credit) for additional information.
  - You have the right to ask for a credit score. Credit scores are numerical summaries of your credit-worthiness based on information from credit bureaus. You may request a credit score from consumer reporting agencies that create scores or distribute scores used in residential real property loans, but you will have to pay for it. In some mortgage transactions, you will receive credit score information for free from the mortgage lender.
  - You have the right to dispute incomplete or inaccurate information. If you identify information in your file that is incomplete or inaccurate, and report it to



the consumer reporting agency, the agency must investigate unless your dispute is frivolous. See [www.ftc.gov/credit](http://www.ftc.gov/credit) for an explanation of dispute procedures.

- Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information. Inaccurate, incomplete or unverifiable information must be removed or corrected, usually within 30 days. However, a consumer reporting agency may continue to report information it has verified as accurate.
- Consumer reporting agencies may not report outdated negative information. In most cases, a consumer reporting agency may not report negative information that is more than seven years old, or bankruptcies that are more than 10 years old.
- Access to your file is limited. A consumer reporting agency may provide information about you only to people with a valid need – usually to consider an application with a creditor, insurer, employer, landlord, or other business. The FCRA specifies those with a valid need for access.
- You must give your consent for reports to be provided to employers. A consumer reporting agency may not give out information about you to your employer, or a potential employer, without your written consent given to the employer. Written consent generally is not required in the trucking industry. For more information, go to [www.ftc.gov/credit](http://www.ftc.gov/credit).
- You may limit “prescreened” offers of credit and insurance you get based on information in your credit report. Unsolicited “prescreened” offers for credit and insurance must include a toll-free phone number you can call if you choose to remove your name and address from the lists these offers are based on.
- You may seek damages from violators. If a consumer reporting agency, or, in some cases, a user of consumer reports or a furnisher of information to a consumer reporting agency violates the FCRA, you may be able to sue in state or federal court.
- Identity theft victims and active duty military personnel have additional rights. For more information, visit [www.ftc.gov/credit](http://www.ftc.gov/credit).

**States may enforce the FCRA and many states have their own consumer reporting laws. In some cases, you may have more rights under state law. For more information, contact your state or local consumer protection agency or your state Attorney General. Federal enforcers are:**

| TYPE OF BUSINESS:  | CONTACT:   |
|--|--|
| <p><b>Consumer reporting agencies, creditors and others not listed below</b></p> | <p><b>Federal Trade Commission: Consumer Response Center - FCRA<br/>Washington, DC 20580 * 1-877-382-4357</b></p>                    |
| <p><b>National banks, federal branches/agencies or foreign banks</b></p>         | <p><b>Office of the Comptroller of the Currency Compliance Management, Mail Stop 6-6<br/>Washington, DC 20219 * 800-613-6743</b></p> |

|  |  |
|--|--|
| <b>(word "National" or initials "N.A." appear in or after bank's name)</b>   |  |
| <b>Federal Reserve System member banks (except national banks, and federal branches/agencies of foreign banks)</b>                           | <b>Federal Reserve Board<br/>Division of Consumer and Community Affairs<br/>Washington, DC 20551 * 202-452-3693</b>  |
| <b>Savings associations and federally chartered savings banks (word "Federal" or initials "F.S.B." appear in federal institution's name)</b> | <b>Office of Thrift Supervision<br/>Consumer Complaints<br/>Washington, DC 20552 * 800-842-6929</b>  |
| <b>Federal credit unions (words "Federal Credit Union" appear in institution's name)</b>   | <b>National Credit Union Administration<br/>1775 Duke Street<br/>Alexandria, VA 22314 * 703-519-4600</b>   |
| <b>State-chartered banks that are not members of the Federal Reserve System</b>  | <b>Federal Deposit Insurance Corporation<br/><i>Consumer Response Center, 2345 Grand Avenue, Suite 100</i><br/>Kansas City, Missouri 64108-2638 * 1-877-275-3342</b> |
| <b>Air, surface, or rail common carriers regulated by former Civil Aeronautics Board or Interstate Commerce Commission</b>                   | <b>Department of Transportation, Office of Financial Management<br/>Washington, DC 20590 * 202-366-1306</b>  |
| <b>Activities subject to the Packers and Stockyards Act, 1921</b>  | <b>Department of Agriculture<br/>Office of Deputy Administrator - GIPSA<br/>Washington, DC 20250 * 202-720-7051</b>  |

## Anti-Harassment Policy

It is the policy of Mobile Health Team to treat all employees equally in their terms and conditions of employment. The harassment of any employee is contrary to this policy and may be considered a violation of federal law and will be considered justification for disciplinary or other appropriate action. This policy applies to all employees, supervisors, agents, and non-employees who have contact with staff members during working hours.

Harassment is any annoying, persistent act or action that singles out an employee to that employee's objection or detriment, because of race, sex, age, religion, ancestry, national origin, physical handicap or mental condition. Harassment may include any of the following:

- 1) Verbal abuse or ridicule. This includes epithets, derogatory comments, slurs or unwelcome sexual advances, invitations, or comments.
- 2) Interference with an employee's work. This includes physical contact such as assault, blocking normal movement, or interference with work directed at an individual because of his/her sex or other protected status.
- 3) Displaying or distributing sexually offensive, racist or derogatory materials. This includes derogatory posters, cartoons, drawings or gestures.
- 4) Discriminating against any employee in work assignments or job-related training.
- 5) Intimate physical contact.
- 6) Making sexual or racial innuendos.
- 7) Demanding favors (sexual or otherwise), explicitly or implicitly, as a condition of employment, promotion, transfer or any other term or condition of employment.
- 8) Retaliation for having reported harassment.

It is every employee's responsibility to ensure that his or her conduct does not include or imply harassment in any form. If, however, harassment or suspected harassment has or is taking place, the following will apply:

- 1) Any harassment or suspected harassment should be reported to Mobile Health Team. If the harassment involves an employee of Mobile Health Team then the harassment should be reported to the Human Resources Department of Mobile Health Team. A written statement by the complainant setting forth all pertinent facts may be required.
- 2) Any supervisor who receives a report of or has knowledge of harassment shall promptly inform the Human Resources who will then determine whether further investigation is warranted.
- 3) Each complaint shall be investigated by Human Resources and a determination of the facts will be made on a case-by-case basis. Appropriate action up to and including discharge may then be taken.
- 4) The results of the investigation shall be kept confidential and provided only to those employees of Mobile Health Team on a need-to-know basis.
- 5) The investigative files, including the complaint, shall be maintained by Human Resources. Any disciplinary action taken will also be documented in the employee's personnel file.
- 6) Mobile Health Team will not tolerate harassment or any form of retaliation against an employee who has either instigated or cooperated in an investigation of alleged harassment. Violation of this provision may result in discharge.

## **Substance Abuse Policy**

### **Illegal Drugs**

The following acts or conduct constitute violations of this Policy:

The use or possession of illegal drugs on Mobile Health Team premises or while working for any Client company. The sale, distribution, purchase, or transfer of illegal drugs at any time or place, or attempt to perform any of these acts; or The possession of illegal drug paraphernalia by employees on Mobile Health Team or Client company premises or during Mobile Health Team or Client company working hours.

### **Alcoholic or Intoxication Beverages**

The unauthorized use or possession of alcohol or intoxication beverages on Mobile Health Team or Client company premises or during work hours is a violation of Mobile Health Team policy. Additionally, a BAC or BRAC at 0.04 or above during working time is a violation of this policy.

At designated Mobile Health Team or Client company-sponsored or approved events, approved by Management Committee Member, the possession or use of alcoholic beverages does not constitute a violation of this policy. If alcohol is served at these designated events, employees are expected to conduct themselves in a manner so that they do not represent a danger to themselves or other employees, to the general public, or to Mobile Health Team or Client company's reputation.

### **Legal Drugs**

Any employee undergoing medical treatment, which includes the use of any drug or medication which is affecting the employee's ability to safely perform job-related functions must notify the head Human Resources Representative at the employee's designated work location, or his/her designated representative, in writing, that the employee is using a medication. (The employee does not have to provide the HR representative with the name of the medication.) The HR representative will then notify an appropriate health care provider, e.g. a nurse, to evaluate the situation and make a recommendation. Any employee who exhibits behavior while taking a medication, which is determined by the Client company to limit the employee's ability to safely perform the employee's job functions, to induce inappropriate conduct or criminal behavior by the employee, to limit the employee's productivity, to endanger other people or property, or to negatively impact Mobile Health Team's public image, may be required to remain off work until the employee's behavior is changed or corrected. Mobile Health Team at all times reserves the right to have a licensed physician examine an employee under these circumstances.

### **Illegal Drug-Related Convictions**

Any employee must, as a condition of employment, notify Mobile Health Team of any conviction for a drug-related offense, regardless of whether or not the violation occurs on Mobile Health Team premises, on the premises of a workplace under the control of Mobile Health Team or Client company, or while on the job. "Conviction" means finding guilt (including plea of nolo contendere) or imposition of sentence, or both, by any judicial body with the responsibility to determine violation of federal, state, or local criminal statutes. The

employee must report the conviction not later than five (5) days after the conviction. An employee's failure or refusal to report a conviction as outlined above constitutes a violation of this policy.

## **Policy Enforcement**

### **Substance Abuse Testing**

Under this Policy, Mobile Health Team or Client company will implement per-employment, reasonable suspicion, possession, post-accident, random, and return to duty, or follow-up, or both, testing. Mobile Health Team or Client company reserves the right, as a condition of employment or continued employment, to request employees to submit to tests, including, but not necessarily limited to, urine tests, breath tests, saliva tests, blood tests, or other tests or examinations to determine the use of any illegal drugs, alcohol, or the abuse or misuse of any legal drugs prohibited by this Policy, or to determine the employee's fitness for duty ("Test" or "Tests"). These tests, which may be unannounced, may be utilized under the following circumstances:

### **Pre-employment**

Pre-employment testing is required of applicants or candidates as a condition of employment.

### **Reasonable Suspicion**

Mobile Health Team or Client company may request an employee or employees to submit to a Test when a supervisor has reasonable suspicion that an employee may be using or under the influence of illegal drugs or alcohol or abusing or misusing legal drugs, or where a supervisor is concerned, and can articulate facts demonstrating that concern, about the employee's safety, the safety of the general public or the risk of damage to property, due to an employee's mental or physical condition or behavior. Furthermore, Mobile Health Team or Client company may request an employee or employees to submit to a test when Mobile Health Team or Client company has a reason to believe that specific individuals, or all or portions of groups, shifts, or those at an entire location or work area are suspected of using or possessing illegal drugs, alcohol, drug paraphernalia, or abusing or misusing legal drugs, or when any of these items are found in an area controlled or used exclusively by a designated employee or employees.

### **Possession**

Mobile Health Team or Client company may request an employee or employees to submit to a Test if an employee is found in possession of suspected illegal drugs, alcohol, or drug paraphernalia.

### **Post-Accident**

If an employee suffers an on-the-job injury (requiring treatment from a medical provider, e.g. a nurse or doctor) or if a serious or potentially serious accident or incident occurs in which safety rules and procedures were violated, equipment or property was damaged (including but not limited to automobiles, trucks, and other equipment), or careless acts were performed, Mobile Health Team or Client company will request the employee to submit to a test. If an employee or other person on Mobile Health Team or Client company premises fails to use prescribed personal protective equipment while working on Mobile Health Team or Client company premises or while working on Mobile Health Team time, Mobile Health Team or Client company

may request the employee to submit to a test.

#### **Random**

Mobile Health Team or Client company may request that employees submit to random drug testing. A bias free method of employee selection is used to ensure that the employees are randomly selected.

#### **Return to Duty and Follow-Up**

When an employee returns to work from a disabling injury, extended absence or illness, or upon completion of an approved substance treatment or counseling program, as a condition or reinstatement, Mobile Health Team or Client company may request the employee to submit to a test. Mobile Health Team or Client company may continue to request follow-up test, including unannounced tests, as permitted by applicable law, after reinstatement.

#### **Consent**

Any employee who refuses to submit to drug and/or alcohol testing requested under the terms of this policy will be subject to discharge and denial of re-employment opportunities. Any applicant who refuses to submit to a test under the terms of this policy will not be considered for employment.

#### **Specimen Collection and Testing Procedure**

Urinalysis is the method normally employed for testing for the presence of drugs, but Mobile Health Team or Client company reserves the right to utilize other methods. Mobile Health Team or Client company may require observed collection of a specimen if the professional collection specialist believes that the individual providing a specimen has attempted to or has substituted, tampered with, or adulterated a specimen. If the results of the screening test are positive, a confirmation test will be performed to corroborate the results of the screening test. The results of the confirmation test are controlling. The laboratory will retain, for a period of one year, a portion of all specimens that test positive. Any employee who tests positive may have a test performed, at the employee's expense, upon the retained portion of the specimen. Mobile Health Team or Client company and/or its agent or designee retains the right, at all times, to direct control of the specimen, including transportation to and from the approved retesting laboratory. Consideration will be given to the results of the retest. However, those results are not binding upon Mobile Health Team or Client company. Breath or saliva testing will be the methods normally employed for testing for the presence of alcohol, but Mobile Health Team or Client company reserves the right to utilize other methods. A saliva or breath specimen will be first being obtained from the employee or applicant, and a test will be performed. If the results are positive, an EBT or other test will be utilized for a confirmation test. The results of the confirmation test are controlling.

## **Test Results**

### **Medical Review Officer**

Mobile Health Team and Client company utilize the services of an MRO to review test results.

#### **Drugs**

A positive test result occurs when the initial screening and the confirmation test indicates the presence of the drug(s) for which the test was conducted. A positive test result is a violation of Mobile Health Team and Client company policy. A negative test result occurs when wither the initial screening or the confirmation test indicates the absence of the drug(s) for which the test was conducted. If the employee tests positive for a substance for which the employee could have a valid explanation, i.e. a legal drug, the MRO will request the employee to provide an explanation for the positive test results, including, but not limited to, documents or a container demonstrating a current and valid prescription from a physician of the drug or medication which caused the positive test result. After consideration of the employee's explanation, if the MRO determines that the employee has a valid explanation for the positive test results, e.g. the employee is taking a legal drug, the MRO will consider the test result as a negative. Mobile Health Team and Client company nevertheless retain the right to ensure that the employee can safely perform the functions of the employee's position and that the employee's use of the drug or medication does not constitute a threat of harm to others.

#### **Alcohol**

A positive test result occurs when both the initial test and the confirmation test indicate the presence of alcohol equal to or greater than 0.04. A positive test result is a violation of this policy. A negative test result occurs when either the initial test or the confirmation test indicates the presence of alcohol less than 0.04.

#### **POTENTIAL ACTIONS FOR VIOLATIONS OF THIS POLICY**

Any applicant who tests positive for illegal drugs or alcohol will not receive any further consideration for employment.

#### **Refusal to Submit to Search, Inspection, or Substance Abuse Testing**

Any employee who refuses to submit to a search, inspection or substance abuse testing as described in this Policy will be discharged. Sale, Distribution, Transfer, or Purchase (or Any Attempt to Perform Those Acts), of Illegal Drugs, While On or Off Mobile Health Team Premises.

Any employee discovered manufacturing, distributing, transferring, dispensing, or purchasing illegal drugs, or attempting to perform any of these acts, whether on or off Mobile Health Team premises, will be discharged.

#### **Conviction of Illegal Drug Offense**

Any employee convicted under federal, state, or local law of any offense relating to illegal drugs may be discharged if the conviction affects the employee's attendance or job performance, damages Mobile Health Team's reputation, or leads to the reluctance or refusal or coworkers to work with the employee.

#### **Substitution or Alteration of, or Tampering with Specimens**

Any employee whom Mobile Health Team believes has or has attempted to degrade, dilute, switch, alter, or tamper with, in any manner, a specimen to be submitted for drug alcohol testing will be discharged. Alternatively, Mobile Health Team may request the employee to provide another specimen under conditions that will ensure the integrity of the specimen, including observed collection procedures.

***WARNING: In some states adulterating or substituting a sample, or attempting to do so, may considered a crime.***

Observes use or possession of illegal drugs while on or off the job, and observed use, consumption, or possession of alcohol on the job. These circumstances will result in immediate suspension without pay, and the employee may be subjected to tests and further investigation to determine the nature and extent of the employee's involvement with the illegal drug(s) and/or alcohol. If the investigation reveals that the employee violated this policy, the employee will be discharged. If the investigation reveals otherwise, the employee will be returned to work and paid for the time off.

#### **Random**

Any employee who test positive for illegal drugs will be discharged.

#### **Return to Duty and Follow-Up**

Any employee who test positive for illegal drugs on a return to duty test, following a disabling injury or an extended absence or illness, will be discharged. Any employee who test positive for illegal drugs or alcohol on a return to duty or follow-up test, following completion of an approved substance abuse treatment or counseling program will be discharged. Use of or unusual behavior attributable to legal drugs of which Mobile Health Team has not been notified. These circumstances will result in immediate suspension without pay. The employee may then be subjected to tests or a medical examination, or both. Assuming a positive confirmation test result or information suggesting that the employee's use of the legal drug prevents the employee from safely performing the functions of the employee's position, or created the likelihood of harm to others or damage to property, the employee will either be required to remain off work until the situation is corrected, or if that action is not feasible, then the employee will be subject to alternative action, up to and including termination of employment.

#### **Effect of a Positive Test Result on an Employee's Unemployment or Workers' Compensation Claim**

A positive test results for illegal drugs or alcohol could result in an employee being denied, or receiving reduced, unemployment benefits or workers' compensation benefits, or both.

#### **Effect of a Positive Test Result on Future Employment with Mobile Health Team**

Mobile Health Team will not consider the application for employment of any applicant who previously tested positive on a pre-employment drug or alcohol test with Mobile Health Team or any Mobile Health Team Staffing employee who tested positive for a drug or alcohol test and who was discharged.

#### **Employee Participation in a Substance Abuse Rehabilitation Program**

This portion of the policy is intended to provide employees with Mobile Health Team Staffing's view towards voluntary participation in a substance abuse rehabilitation program ("Program").

Mobile Health Team Staffing supports employees who recognize their worn substance abuse problems and encourage those employees to seek professional help to resolve those problems.

However, every employee is responsible for seeking help before drug and alcohol problems lead to disciplinary action. An employee's voluntary participation in a program will not be used as a basis for disciplinary action and will not be used against the employee in any disciplinary proceeding. On the other hand, participation in a program is not a defense to or a substitute for



disciplinary action imposed for violations of this policy. The key is to seek professional assistance when it is needed and before this policy is violated.

**Smoking**

No smoking will be allowed except in designated smoking areas only. This policy is for the health and safety of all employees.