

HHHN Policies & Descriptions Supplemental Document

Compliance & Legal

Clinical Staff BLS Certification

It is the policy of Hudson Headwaters Health Network to have at least one staff member trained and certified in BLS present at each HRSA-approved service site.

Code of Conduct

Hudson Headwaters Health Network ("Hudson Headwaters"), its Board members, employees, contractors, agents, consultants, volunteers, and others who act on Hudson Headwaters' behalf ("Staff") have a responsibility to conduct themselves in adherence with our guidelines.

Compliance Reporting & Response

It is the Policy of Hudson Headwaters Health Network to encourage prompt reporting, at the earliest reasonable opportunity, by employees, board members, independent contractors and vendors of any activity or conduct in violation of any HHHN compliance policy or any federal, state or local laws or regulations pertaining to compliance related matters

Conflict of Interest

It is the policy of Hudson Headwaters Health Network (the Network) to outline the standard of conduct expected of all management employees, officers, and Directors, and members of committees with Board of Directors-delegated powers of, as well as others who are in a position to influence or make business decisions on behalf of the Network.

Contracted Provider Support Staff Onboarding and Offboarding Procedure

Hudson Headwaters Health Network contracts with outside providers to serve our patients at our health centers. Contracted providers may bring their own staff as referenced in their contract agreement, to work with them at our health centers.

Excluded Persons

It is the policy of Hudson Headwaters Health Network to be in compliance with regulatory professional billing practices, will utilize the Office of the Inspector General's registry of Excluded Individuals from Federal programs when making employment or contracting determinations.

Patient Identification

It is the policy of Hudson Headwaters Health Network (the Network) to establish and manage patient identification practices and tools across all areas of patient care and services. Proper utilization of these patient identification practices and tools are critical during each touchpoint of patient care.

Release and Disclosure of Protected Health Information

It is the policy of Hudson Headwaters Health Network to adhere to the HIPAA Privacy & Security Rules and NYS Privacy Guidelines in relation to the release and disclosure of medical

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records while ensuring patient confidentiality is maintained and medical records are secure when is responding to requests for release of confidential information.

Service Animals

It is Hudson Headwaters Health Network's policy to recognize that individual with disabilities may require a use of service animals.

Standards of Conduct

Hudson Headwaters Health Network (the Network), its Board members, as well as its employees, contractors, agents, consultants, volunteers, and others who act on the Network's behalf (Staff) have a responsibility to Network patients, Federal and State Governments, other Network funders and the communities served by the Network.

HIPAA, Patient Rights, Privacy, Confidentiality & Security of Information

Breach Notification

It is the policy of Hudson Headwaters Health Network to provide guidance when there is a breach of patients unsecured protected health information in a manner not permitted under the Health Insurance Portability and Accountability Act of 1996.

Confidentiality of Protected Health Information

It is the policy of Hudson Headwaters Health Network (Network) to maintain confidentiality of all protected health information (PHI), including electronic information. Confidentiality must be safeguarded by the restrictive use of (PHI) obtained from and about a patient.

Patient Rights, Responsibilities & Privacy Practices

It is the policy of Hudson Headwaters Health Network (Network) to ensure that the Patient's Bill of Rights, Patient Responsibilities, and Notice of Privacy Practices are appropriately made available to patients.

Human Resources

Background Checks

Hudson Headwaters Health Network requires a criminal background check for all potential staff and Board of Directors members. In addition, HHHN requires an educational background check for all potential staff members.

DOT Drug and Alcohol

It is the policy of Hudson Headwaters Health Network (the Network) to provide our employees with a safe workplace free of drugs and alcohol. Accordingly, the Network has adopted this alcohol and drug testing policy and procedure in compliance with the United States Department of Transportation (D.O.T.) regulations.

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I-9 Policy

It is the policy of Hudson Headwaters Health Network (Network) that in order to comply with federal regulations of the Immigration Reform and Control Act (IRCA), all Network employees are required to complete an Employment Eligibility Verification (I-9 form).

Orientation Programs New Hire, Network Employee and Interns

It is the policy of Hudson Headwaters Health Network (the Network) and the individual departments to provide orientation programs to Network employees (new, rehired, and transferring) and interns.

Workers' Compensation

It is the policy of Hudson Headwaters Health Network (the Network) to comply with New York State law and to aid any employee whose injury or illness is determined to be compensable under the provisions of the NYS Workers' Compensation Act.

Information Systems

Electronic Medical Record Access by External Entities

It is the policy of Hudson Headwaters Health Network (the Network) to ensure the security and integrity of patient health records when determining and providing accessibility to external entities including payers, auditors, and outside providers.

Responsibility for Data Confidentiality & Integrity

Hudson Headwaters Health Network holds IT Administrators responsible for the security of all data, communications and systems used in the Network. Network users are responsible for the security of all data which may come to them, regardless of the source or the format.

Operations, Clinical Services and Administrative Support

Health Center/Administrative Office Closure

It is the policy of Hudson Headwaters Health Network to maintain scheduled hours of operation at all Health Center, Dental and Administrative sites. In the event of a situation which makes normal operations unsafe, a systematic approach is utilized to determine action to be taken.

Interpreter Service

It is the policy of Hudson Headwaters Health Network to provide interpreter and/or translator services for non-English speaking patients, as well as sign language service for hearing impaired patients.

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Medication Disposal for Patients

Measures are taken to assist Hudson Headwaters Health Network patients to find access to appropriate medication disposal programs and/or systems.

Recalls

It is the policy of Hudson Headwaters Health Network (the Network) to ensure manufacturer recalls are processed and addressed appropriately to protect patients and staff.

Risk Management & Safety

Business Continuity Plan

Hudson Headwaters Health Network recognizes the importance of continuity planning to ensure the continuity of performing essential services across a wide range of emergencies and incidents, and to enable our organization to continue functions on which our patients and communities depend. In normal operations, emergency situations, and in a time of activated Business Continuity management, the Network complies with all applicable Federal, state, and local laws and regulations.

Emergency Preparedness

It is the policy of Hudson Headwaters Health Network (the Network) to provide each Health Center and administrative site with a customized Emergency Preparedness Plan and Procedure manual that ensures effective mitigation, preparation, response to and recovery from emergencies.

Environment of Care Program

Hudson Headwaters Health Network is committed to providing a safe and healthy environment for all patients, staff and visitors. Preventative measures are taken to reduce the risk of personal accidents and injuries through the provision of safe work practices.

Fire Prevention Program

It is the policy of Hudson Headwaters Health Network (the Network) to provide an environment that is safe from fire for all staff members, patients and visitors. The Network proactively takes action to avoid fires through a process of equipment and environment evaluation.

Hazard Vulnerability Assessment

It is the policy of Hudson Headwaters Health Network (the Network) that each Health Center and administrative site be assessed at least annually and more often as needed, using the Hazard Vulnerability Assessment Tool, to determine what potential risk factors involving disasters may exist within the Network.

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Hazardous Materials Communication

The purpose of this program is to inform you that Hudson Headwaters Health Network (The Network) is providing a safe workplace and complying with the OSHA standards by compiling a hazardous chemicals list, by using Material Safety Data Sheets (MSDS).

Risk Management & Safety Program

The Risk Management & Safety Program is designed to support the mission and vision of the Network as it pertains to quality improvement, clinical risk, and patient safety as well as visitor, third party, and employee safety and potential business, operational, and property risks.

Workplace Violence Awareness & Prevention

It is the policy of Hudson Headwaters Health Network to provide an environment of emotional and physical safety for its staff and patients; therefore having a zero-tolerance policy for workplace violence including domestic violence.