

North Stonington Ambulance Association, Inc.

Administrative Manual

**PO Box 367
10 Mains Crossing Road
North Stonington, Connecticut 06359**

North Stonington Ambulance Association

Policy & Procedure Manual

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Chapter A: Certification & Licensure

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B-01 Purchasing Policy

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1) Purpose

This policy is enacted to guide and control the purchasing of all items and services utilized by the North Stonington Ambulance Association in performing its functions as what may be classified as a quasi-municipal ambulance service.

2) Purchasing Objectives

To procure materials, supplies, equipment, public improvements and services at the lowest cost consistent with the quality and service rendered. To conduct purchasing without regard to the political affiliation, race, sex, age, religion, national origin, disabilities, family relationship or business associations of vendors, contractors or consultants.

3) General Procedures

Purchasing administration shall be in conformance with the Purchasing Policy, forms and regulations prepared and published subject to the approval of the Board of Directors. Said manual, forms, supplemental regulations, specifications, condition, etc., may be amended and modified from time to time in the same manner as set forth herein.

4) Order of Precedence of Regulations

This policy and the above described manual shall together provide the management control of all purchasing.

5) Purchasing Policy

- a) To clearly establish the responsibility for the purchasing function as being vested with the President and his/her duly appointed representative, shall be the Purchasing Agent
- b) To procure materials, supplies, equipment and services at the lowest cost consistent with the quality and service rendered. Services include professional and construction contracts.
- c) To maintain standards of quality in materials, supplies, equipment and services.
- d) To conduct purchasing without regard to the political affiliation, race, sex, age, religion, national origin, disabilities, familiar relationship or business associations of vendors, contractors or consultants.
- e) North Stonington Ambulance Association will make its purchases from local vendors whenever possible. A local vendor is defined as those having their principal place of business located in North Stonington. The lowest qualified bid for goods and services as determined by the Board of Directors will be accepted.

6) Purchasing Procedures

- 1) The Board of Directors shall have the responsibility for approval of specifications for equipment, materials, supplies or services to be acquired, as submitted by officers or committees thereof. The Board of Directors shall consult with the various officers or committees concerning the quality of the goods and services to be purchase

2) VETO

The Town of North Stonington Board of Selectmen be notified and approve of any expenditure of \$2,500.00 or more.

- (a) Should the Board of Selectmen fail to respond within 30 calendar days of said notification, the expenditure shall be considered approved.

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3) Contracts

The Board of Directors is responsible for the execution and distribution of all contracts.

4) Scheduled Buying

North Stonington Ambulance Association may buy items which are used on a volume basis.

5) Relations with Vendors

The Board of Directors shall strive to establish a relationship of mutual confidence and satisfaction between the Ambulance Association and its suppliers.

6) If there is a tie bid between two or more local vendors, the Board of Directors may provide the opportunity for the bid to be:

- (1) shared equally by the tied local vendors, or in failing that to:
- (2) awarded on a rotating basis, which order is to be determined by draw in the presence of three or more witnesses.

7) Subject to further provisions of this policy, it shall be the objective of the North Stonington Ambulance Association to have all purchases and contracts valued at over \$ 5000.00 made by competitive bid or proposal, except purchases herein excused or exempted. It shall be the duty of North Stonington Ambulance Association to endeavor to obtain three (3) or more bids, quotes or proposals on all purchases where practicable, except for purchases of less than \$ 1500.00. Purchases or contracts with a value of less than \$ 1500.00 may be made by the Board of Directors based upon price/cost quotations. Purchases of less than \$ 1500.00 may be made by the Board of Directors without the requirement of bids, quotes or proposals as long as the purchases are within the approved budget and intent.

a) With approval of the Board of Selectmen, the Board of Directors shall make the purchase from or award the contract to the lowest responsible bidder, quote or proposal. The Board of Directors shall consider the following criteria in their determination of the lowest responsible acceptable bid, quote or proposal:

- 1) The lowest bid/quote proposal which is directly responsive to the invitations;
- 2) The quality of the goods or services to be supplied;
- 3) The conformity of the submission, to the specifications;
- 4) The suitability of the goods or services to the requirements of the officers or committees for which the purchase is to be made;
- 5) The financial resources insurance coverage and character and ability of the person or firm bidding, quoting or proposing;
- 6) The ability of the bidder to perform promptly;
- 7) The prior and current compliance of the bidder, quote or proposer with all laws relating to the contract or the bidder, quoter or proposer's ability to provide future maintenance and warranty service, if applicable service;
- 8) The ability to post a performance bond in that the North Stonington Ambulance Association, in its discretion, may require the successful bidder to post a performance bond for bids over \$ 30,000.00
- 9) Such other relevant factors which the Board of Directors may consider.

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- b) The Board of Directors, in its discretion, may directly encourage and solicit bids, quotes or proposals from among the taxpayers and citizens of the town of North Stonington for all purchases irrespective of whether or not competitive bidding is required pursuant to paragraph 7 above.
- c) The Board of Directors, prior to entering into or awarding any contract or making any purchase may reject any or all bids, quotes or proposals or any part of any bid, quote or proposal.
- 8) In the event of an emergency and due to the existence of extraordinary circumstance, where the goods or services are needed immediately, the President, in his discretion, may authorize the purchase of goods or services without competitive bids, quotes or proposals subject to the rule of reason. In the event such an emergency purchase is made, the President shall furnish a written report to the Board of Directors at the next regular meeting, informing the Board of such purchase; a copy shall be submitted to the Board of Selectmen.
- 9) If the proposed purchase or contract involves a purchase of over \$5000.00 North Stonington Ambulance Association shall invite sealed bids or, at the Board of Director's discretion, sealed quotes and or proposals. If the goods or services for which the bid or proposal is invited will include continuing orders or contracts for repeated work or the same goods over a period of twelve (12) months, the aggregate projected expenditure for the entire twelve (12) month period shall be calculated in order to determine the total value of the purchase. It shall not be permissible to frustrate the bidding requirement by inviting or submitting multiple bids or proposals for less than the whole of the commodity in issue so as to reduce the value of each proposal to a sum less than \$5000.00 ;(A) No transaction which is essentially a unit shall be divided for the purpose of evading the interest of this policy and procedures.
- 10) When the Board of Directors determines that it must seek bids or proposals as per the provisions of this ordinance, it shall invite same by giving at least five (5) days public notice thereof in newspapers having circulation in the town of North Stonington; and by written invitation mailed to all vendors actually known to the Board of Directors and by posting same on a public bulletin board located within the Town Hall. All invitations shall include detailed specifications or indicate where same may be obtained, shall specify whether bids or proposals are invited, shall specify the time and place of bid proposal filing, and the time and place the bids or proposals will be opened. The invitations shall also state the time after opening within which - an award will be made or all bids/proposals rejected. In proposals, each such proposal shall specify a length of time the proposed price shall be valid. The Board of Directors shall determine, in its discretion, whether the commodity being sought is more properly suited to purchase by proposal or bid and shall characterize the solicitation accordingly. The Board of Directors, in its discretion, may waive the requirements for public notice and sealed bids or proposals concerning any purchase after it determined that it is in the best interest of the North Stonington Ambulance Association to do so. Should the Board of Directors require bidders to furnish references, such requirement shall be set forth in the bid specifications.

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- a) All bids or proposals shall be publicly opened by the Board of Directors at the time and place specified. Each bid/proposal and bidder/proposer shall be recorded and the bid/proposal record shall be available for public inspection. Any bidder or proposer who fails, neglects, or refuses to furnish the Board of Directors with financial statements and/or information which the Board of Directors may require to determine his responsibility as a bidder/proposer shall be disqualified from having said bid/proposal considered. Insignificant bid proposal irregularities may be waived by the Board of Directors.
- b) The Board of Directors, in its discretion, may require a certified check or bid bond be furnished with the bid or proposal, although such check or bond need not be required for the purchase of commercially and generally available goods. In the event any successful bidder or proposer shall refuse to accept, within the time specified by the Board of Directors, a contract awarded to him, he shall forfeit the bond to the North Stonington Ambulance Association and such contract may be awarded to the next lowest responsible bidder/proposer, subject to the same terms and conditions set forth herein.
- 11) If the amount of the expenditure is estimated to be less than \$ 5000.00, except as herein provided, the purchase may be made by the Board of Directors in the open market without the need for formal advertising or competitive bidding/proposing. The Board of Directors may, but is not required to, obtain at least three (3) competitive quotations from different vendors, the Board of Directors, may require written price quotes but, in its discretion, may permit verbal quotations.
- 12) If the Board of Directors determines that any or all of the bids submitted are unacceptable for any good and substantial reason, the Board of Directors, in its discretion, may reject such bid or bids within a reasonable time after the opening of such bids and the reason for such rejection shall be recorded in the minutes of the Board of Directors Meeting.
- 13) It is encouraged in all purchases that it be determined if a State Purchase Agreement exists and that the Association utilizes that bid as long as the technical specifications meet the needs of the Association.
- 14) Professional services such as lawyers, architects, engineers, etc, are exempt from this policy. The selection of professional services can be at the discretion of the Board of Directors. In making their selection they may consider those firms or individuals that have the best understanding of the Towns and Associations needs and that they can provide the most cost effective results, notwithstanding this should not preclude providing cost estimates and hourly rates and or project rates to use as cost comparisons to assure the Association is getting the most competitive values.

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B-02 Receiving Donations

Number: B-02	Created: 12/07/04
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1) Purpose

This policy has been created to assist the organization with direction on proper handling of funds received via donations.

2) Vision

As a nonprofit organization that was created solely by donations, North Stonington Ambulance Association recognizes this source of income carries not just a monetary value, but a sentimental value as well. Any time a donation is accepted by NSAA, an unspoken agreement with certain expectations has been made. In order to strive to fulfill this agreement, NSAA must fund projects or programs with good moral judgment. Unless otherwise specifically requested, at no time should donated funds be utilized to directly offset the bottom line expense to taxpayers or insurance companies.

3) Specified Donations

From time to time, NSAA may solicit donations for specialized equipment, training, or events. Donations that are received for these causes are obligated to be spent toward this purpose.

4) Non Specific Donations

While most donations fall into this category, it is important not to lose sight of the underlying intention associated with it. This type of donation is not only a gift to the association but also to the field of emergency medicine as a whole. When donations are received that are not specifically directed to a project or item, the Board of Directors shall choose which project to fund or retain the funds until such time one exists.

5) Anonymous Donations

If the donation can not be used for the specified reason donated, the Board of Directors shall choose which project to fund.

6) Projects and Programs

At the beginning of each fiscal year the Board of Directors shall approve a list of projects or programs that should be funded by donations received. These items are typically long-term capital improvements, personnel appreciation events, and enhancing medical equipment.

a) Items exempt from funding by donations

Unless specifically requested, at no time shall a project or program be created, adopted, or modified in any manner to assist the expense obligation of the taxpayers. This is to include normal operating expenses such as, payroll, insurances, utilities, housing, and vehicle maintenance.

7) Completed, Expired, Canceled, or Modified Programs

It is expected from time to time, that NSAA will receive donations for projects that have been fully funded, canceled, expired, or modified to achieve a different goal. In these cases, NSAA has an obligation to contact the person providing the donation and seek approval to utilize the funds for other projects or programs.

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Chapter C: Billing

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C-01 Patient Billing

Number: C-01

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1) Purpose

This policy is enacted to guide and control the billing process for ambulance patients.

2) Rates and charges

The rates and charges applied toward any patient bill shall be in accordance with the rates and charges set forth by the State of Connecticut Dept. of Public Health.

3) Billing

All persons, regardless of race, sex, age, religion, national origin, sexual orientation, or disabilities transported via North Stonington Ambulance shall be billed for service.

- a) North Stonington Ambulance Association shall submit all required information for billing to Holdsworth Pelton and Associates. Once Holdsworth Pelton and Associates has received this information, a bill for service should be generated and submitted to the patient's insurance provider.
- b) In the cases where a balance is due that is not paid for by insurance companies, or where the patient is not insured, Holdsworth Pelton and Associates shall send a bill for services to the patient on regular intervals. (e.g. 30, 60, 90 days)
- c) Holdsworth Pelton and Associates may solicit a "payment plan" to any patient they feel necessary. This payment plan is at the sole discretion of Holdsworth Pelton and Associates.

4) Delinquent Accounts

If for any reason a balance remains for any one account after 120 days where a "payment plan" is not in effect, Holdsworth Pelton and Associates shall forward a copy of those accounts to North Stonington Ambulance Association for review. It shall be determined by the management of North Stonington Ambulance Association if the account is to be forwarded to a collection agency.

5) Collections

Any bill that has not been paid in full may be sent to a collections agency. The following is a list that should be considered when making this decision:

a) Write-off

- 1) The patient qualifies for Medicare and the remaining balance is less than \$75.00
- 2) The patient is a town resident with a remaining balance less than \$100.00
- 3) The patient is a town resident that has deceased
- 4) The patient has provided a written letter of hardship

b) Credit Reporting and Legal Recourse

- 1) The patient has failed to make any contact or arrangements for payment
- 2) The patient has received insurance monies for payment toward EMS services, and has not paid NSAA
- 3) The patient failed to make payments as billed or promised.

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Chapter D: Employment

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D-01 Equal Employment Opportunity

Number: D-01	Created: 06/13/01
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In order to provide equal employment and advancement opportunities to all individuals, membership and employment decisions at NSAA will be based on merit, qualifications, and abilities. NSAA does not discriminate in membership or employment opportunities on the basis of race, color, religion, sex, national origin, age, or any other characteristics protected by law. All membership and employment procedures are regulated under State of Connecticut law.

This policy governs all aspects of membership and employment, including selection, job assignment, discipline, termination, and access to benefits and training.

Any employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their Crew Chief or supervisor. Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination.

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D-02 Disability Accommodation

Number: D-02	Created: 06/13/01
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NSAA is committed to complying fully with the Americans with Disabilities Act (ADA) and ensuring equal opportunity in employment for qualified persons with disabilities. All employment practices and activities are conducted on a non-discriminatory basis.

Hiring procedures have been reviewed and provide persons with disabilities meaningful employment opportunities. Pre-employment inquiries are made only regarding an applicant's ability to perform the duties of the position.

Post-offer medical examinations are required only for those positions in which there is a bona fide job-related physical requirement. They are given to all persons entering the position only after conditional job offers. Medical records will be kept separate and confidential.

Reasonable accommodation is available to all disabled employees, where their disability affects the performance of job functions. All employment decisions are based on the merits of the situation in accordance with defined criteria, not the disability of the individual.

Qualified individuals with disabilities are entitled to equal pay and other forms of compensation (or changes in compensation) as well as in job assignments, classifications, organizational structures, position descriptions, lines of progression, and seniority lists. Leave of all types will be available to all employees on an equal basis.

NSAA is also committed to not discriminating against any qualified employees or applicants because they are related to or associated with a person with a disability. NSAA will follow any state or local law that provides individuals with disabilities greater protection than the ADA.

This policy is neither exhaustive nor exclusive. NSAA is committed to taking all other actions necessary to ensure equal employment opportunity for persons with disabilities in accordance with the ADA and all other applicable federal, state, and local laws.

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D-03 Life Threatening Illness

Number: D-03	Created: 06/13/01
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Employees with life-threatening illnesses, such as cancer, heart disease, and HIV/AIDS, often wish to continue their normal pursuits, including work, to the extent allowed by their condition. NSAA supports these endeavors as long as employees are able to meet acceptable performance standards. As in the case of other disabilities, NSAA will make reasonable accommodations in accordance with legal requirements, to allow qualified employees with life-threatening illnesses to perform the essential functions of their jobs.

Medical information on individual members is treated confidentially. NSAA will take reasonable precautions to protect such information from inappropriate disclosure. Officers and other employees have a responsibility to respect and maintain the confidentiality of employees' medical information. Anyone inappropriately disclosing such information is subject to disciplinary action, up to and including termination of membership/employment, and may be subject to legal consequences.

Employees with questions or concerns about life-threatening illnesses are encouraged to contact the President for information and/or referral to appropriate services and resources.

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D-04 Reference Checks

Number: D-04	Created: 06/13/01
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To ensure that individuals who join NSAA are well qualified and have a strong potential to be productive and successful, it is the policy of NSAA to check the employment and/or personal references of all applicants.

If the individual was/is a member of another ambulance service, NSAA may request that service send a letter of recommendation to the President.

The President will respond in writing only to those reference check inquiries that are submitted in writing. Responses to such inquiries will confirm only dates of employment, wage rates, and position(s) held. No employment data will be released without a written authorization and release signed by the individual who is the subject of the inquiry.

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D-05 Per-Diem EMT Application Process

Number: D-05	Created: 06/13/01
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Persons seeking employment with NSAA on a Per Diem basis must be processed as follows:

An application for employment will be sent only upon request.

All persons interested for a position shall submit an application, along with a resume when requested. Copies of their EMT card, CPR card, driving record and proof or declination of Hepatitis B vaccinations may be requested during this process.

The returned application shall be delivered to the Hiring Committee, the Supervisor, or designee, who will log it with an assigned number.

The Supervisor shall send a letter to the applicant stating that the application has been received and is being processed.

The Hiring Committee, the Supervisor, or designee shall verify the application's contents, verify minimum eligibility such as Age 18 or older, EMT, and that all areas of the application have been properly filled out.

The Hiring Committee, the Supervisor, or designee shall file the application in an "Applications Received" folder

After verifying that all the information is in order, the responsible party(s) shall contact the applicant when positions are available to conduct the testing process.

Should the applicant successfully complete the testing process, the assigned Hiring Committee, the Supervisor, or designee shall setup an interview.

Once the assigned Hiring Committee, the Supervisor, or designee has formed a judgment to hire such applicant, the responsible party(s) shall then conduct an extensive background check. This shall include past employment history, driving record, criminal record, personal reference, etc.

If there is more than one person applying for the position, the Hiring Committee shall appropriately list each person above or below others weighed on the combined information gained by the applicant, testing, and background check.

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D-05 Per-Diem EMT Application Process

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When the Hiring Committee has decided who will best fit the position and how many are to be hired, they shall then bring this information to the executive board.

All hiring must be approved by the Executive Board, based upon a report from the Committee assigned, the Supervisor or designee at that meeting.

No personal information regarding and applicant may be disclosed during an executive board meeting unless in executive session.

If the Executive Board approves offering the position, a resolution shall be made and voted on by the Executive Board.

Following the Executive Board meeting where hiring is decided, the applicant's information shall be transferred back to the Supervisor who shall, depending upon the outcome of the meeting, either file the application and supporting materials with those which have been rejected or approved.

If chosen, the Hiring Committee shall send a letter to the applicant offering them a position and stating what their salary will be.

All offers shall be contingent upon a pre-employment physical. Once an offer of employment is made, Hiring Committee, Supervisor, or designee will advise the new employee of the procedure for obtaining a physical. The physical will be scheduled for the employee by the President or Supervisor. The employee is responsible for obtaining a copy of the exam and submitting it to the company for filing. All records and exam results will remain confidential and information will be shared only with those who are required to assure that the employee is medically cleared for duty.

Applicants who decline or fail to appear for a physical exam will not be hired.

After the physical exam the Supervisor shall contact the employee to schedule Orientation and training times.

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D-06 OSHA Compliance

Number: D-06	Created: 06/13/01
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All NSAA personnel will be trained as required by OSHA in the following areas before being allowed to ride on an NSAA vehicle:

- Blood borne Pathogens
- Airborne Pathogens
- Hazardous Materials Awareness
- Fire Extinguishers

OSHA compliance policies are located in a separate OSHA Compliance manual located on the desk.

OSHA requires annual refresher training programs for each of these topics. Any member or employee who is not in compliance with OSHA requirements will be suspended from duty until they become compliant. Failure to come into compliance with OSHA requirements may result in disciplinary action, up to and including termination.

Observers :

An "Observer" is someone who has received permission to ride with NSAA for an approved purpose. The senior EMS officer on scene may, at any time, remove an Observer from that scene if there is a considerable risk of exposure to either bloodborne or airborne pathogens. At no time shall any Observer be permitted to respond to any known Haz-Mat incident. The senior EMS officer on the scene may remove an Observer from any Haz-Mat scene.

Hepatitis B:

OSHA requires that all NSAA employees be vaccinated for Hepatitis B or sign a waiver refusing vaccination prior to being allowed to ride on an NSAA vehicle.

Personnel have the following options, all of which require a signed acknowledgment:

- Acceptance -- See the President for arrangements for vaccination
 - Refusal, but already have vaccination (NSAA requires verification)
- Refusal -- Personnel will sign a declination statement. Should an employee change their mind, the vaccination will be available upon request.

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D-06 OSHA Compliance

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No one will be allowed to ride until they comply with this provision. This provision applies to Observers.

The inside of all NSAA vehicles and all NSAA equipment must be cleaned in compliance with OSHA standards.

After transporting patients known to have HIV/AIDS, Hepatitis, TB or any other communicable disease, the vehicle must be temporarily removed from service and anything touched by the patient or the patient's body fluid must be disinfected per OSHA standards.

Universal precautions -- gloves (and additional protection depending upon the specific situation) -- will be taken for all patient contacts.

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Chapter E: Administrative Assistant

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E-01 Job Description – Administrative Assistant

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Salary Range: \$12.50/hour – \$15.50/hour

Qualifications:

- Eighteen (18) years of age or older
- Other qualifications to be decided by the Board of Directors

Duties and Responsibilities:

Handle all scheduling needs for NSAA as directed by Supervisory personnel

Handle required local, state, and federal reporting paperwork as appropriate.

Assists in the administering of the Attendance and Punctuality Policy as directed by Supervisory personnel.

Other duties as assigned for the benefit of the Association as assigned by Supervisory personnel.

Accurately record time worked and submit timecard totals to a supervisor

Provide a written record, attached to the time card, of duties performed during the pay-week and an accounting of the amount of time spent on each duty.

Follow all policies, procedures, and SOGs of NSAA, Local, Regional, and State laws.

Job Responsibilities Related to Patient Privacy

1. The incumbent is expected to protect the privacy of all patient information in accordance with the Company's privacy policies, procedures, and practices, as required by federal [and state] law, and in accordance with general principles of professionalism as a health care provider. Failure to comply with the Company's policies and procedures on patient privacy may result in disciplinary action up to and including termination of employment or of membership or association with North Stonington Ambulance Association, Inc.

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E-01 Job Description – Administrative Assistant

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2. The incumbent may access protected health information and other patient information only to the extent that is necessary to complete your job duties. The incumbent may only share such information with those who have a need to know specific patient information you have in your possession to complete their job responsibilities related to treatment, payment or other company operations.
3. The incumbent is encouraged and expected to report, without the threat of retaliation, any concerns regarding the Company's policies and procedures on patient privacy and any observed practices in violation of that policy to the designated Privacy Officer.
4. The incumbent is expected to actively participate in Company privacy training and is required to communicate privacy policy information to coworkers, students, patients and others in accordance with Company policy.

Reports to a Supervisor

Reports to the President

Disclaimer

The information provided in this description has been designed to indicate the general nature and level of work performed by incumbents within this job. It is not designed to be interpreted, as a comprehensive inventory of all duties, responsibilities, qualifications and working conditions required of employees, assigned to this job. Management has sole discretion to add or modify duties of the job and to designate other functions as essential at any time. This job description is not an employment agreement or contract.

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Chapter F: Supervisor

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F-01 Job Description – Supervisor

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Serves as the direct manager for day-to-day operations.
Reports to the President.

Salary Range: \$12.50/hour - \$17.50/hour

Qualifications:

- Eighteen (18) years of age or older
- Meets all requirements listed under section 1-15 (Job Description – Emergency Medical Technician, Ambulance Crew)
- Current employee of NSAA in the capacity of Emergency Medical Technician

Primary Responsibilities:

The Supervisor's primary responsibility is acting as an Emergency Medical Technician, including the duties of Crew Chief listed under section 1-17 (Job Description – Crew Chief). It is also the Supervisor's responsibility to evaluate and conduct an ongoing review of the North Stonington Emergency Services System for the needs of NSAA as well as the public we serve.

The Supervisor's duties shall include, but not be limited to:

- Prioritizing all tasks and assignments to facilitate a timely and reasonable completion. This shall supersede any task or assignment that conflicts with a responsibility of greater priority.
- Cooperation with all components of the NSAA EMS system,
- Oversee the interaction between field personnel, act in the capacity of direct supervisor for field staff and serve in the role of liaison between field staff and the Board,
- Order and maintain an adequate supply of medical equipment (i.e. oxygen, delivery devices, bandages, etc.),
- Order and maintain an adequate supply of building goods (i.e. paper towels, hand soap, etc.),
- Attend monthly board meetings and at least 50% attendance at Service (Membership) Meetings,
- Actively communicate with other Supervisors as well as the Board.

Additional Responsibilities:

- Conduct personnel evaluations as needed, at the direction of the Board,
- Evaluate the needs of NSAA related to emergency and pre-hospital care, working to keep NSAA a state-of-the art and progressive service,
- Facilitate relationships between NSAA and the local Police/Fire/EMS agencies and the area Emergency Departments,
- Participate in development and delivery of community health initiatives,
- Other duties as assigned by the President and his/her designee.

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F-01 Job Description – Supervisor

Number: F-01	Created: 07/01/02
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Terms:

- Schedule consists of 24-36 hours per week
 - Shifts worked must be primarily day shifts, unless special approval by the President or his/her designee, except in cases where immediate shift coverage is needed
 - Shifts should only overlap with other supervisors occasionally (1-2 times per month) to allow coordination; generally only one supervisor should work per shift
- Special situations and emergencies may dictate periodic work days/weeks longer than normal

Job Responsibilities Related to Patient Privacy

1. The incumbent is expected to protect the privacy of all patient information in accordance with the Company's privacy policies, procedures, and practices, as required by federal [and state] law, and in accordance with general principles of professionalism as a health care provider. Failure to comply with the Company's policies and procedures on patient privacy may result in disciplinary action up to and including termination of employment or of membership or association with North Stonington Ambulance Association, Inc.
2. The incumbent may access protected health information and other patient information only to the extent that is necessary to complete your job duties. The incumbent may only share such information with those who have a need to know specific patient information you have in your possession to complete their job responsibilities related to treatment, payment or other company operations.
3. The incumbent is encouraged and expected to report, without the threat of retaliation, any concerns regarding the Company's policies and procedures on patient privacy and any observed practices in violation of that policy to the designated Privacy Officer.
4. The incumbent is expected to actively participate in Company privacy training and is required to communicate privacy policy information to coworkers, students, patients and others in accordance with Company policy.

Disclaimer

The information provided in this description has been designed to indicate the general nature and level of work performed by incumbents within this job. It is not designed to be interpreted, as a comprehensive inventory of all duties, responsibilities, qualifications and working conditions required of employees, assigned to this job. Management has sole discretion to add or modify duties of the job and to designate other functions as essential at any time. This job description is not an employment agreement or contract.

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Chapter G: Department Manager

North Stonington Ambulance Association

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G-01 Job Description - Department Manager

Number: G-01	Created: 07/01/05
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Starting Salary:

\$44,500.00

Qualifications:

- Eighteen (18) years of age or older
- Meets all requirements listed under section 1-15 (Job Description – Emergency Medical Technician, Ambulance Crew)
- Current employee of NSAA in the capacity of Emergency Medical Technician

Schedule:

Week 1: (06:00 – 18:00) Monday, Tuesday, Wednesday, Thursday

Week 2: (06:00 – 18:00) Monday, Tuesday, Wednesday, Thursday, Friday

The intent of this schedule is to provide for an average of 54 hours per week and to make up part of the duty crew.

Primary Responsibilities:

The Manager's primary responsibility is acting as an Emergency Medical Technician, including the duties of Crew Chief listed under section 1-17 (Job Description – Crew Chief). It is also the Manager's responsibility to evaluate and conduct an ongoing review of the North Stonington Emergency Services System for the needs of NSAA as well as the public we serve.

The Manager's duties shall include, but not be limited to:

- Prioritizing all tasks and assignments to facilitate a timely and reasonable completion. This shall supersede any task or assignment that conflicts with a responsibility of greater priority.
- Cooperation with all components of the NSAA EMS system,
- Oversee the interaction between field personnel, act in the capacity of direct supervisor for field staff and serve in the role of liaison between field staff and the Board,
- Order and maintain an adequate supply of medical equipment (i.e. oxygen, delivery devices, bandages, etc.),
- Order and maintain an adequate supply of building goods (i.e. paper towels, hand soap, etc.),
- Attend monthly board meetings and at least 50% attendance at Service (Membership) Meetings,
- Actively communicate with other Supervisors as well as the Board,
- Handle timekeeping and payroll for the company,
- Handle bookkeeping, accounts payable, and receivable,
- Maintain accurate records and logs regarding all financial income and expenses.

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G-01 Job Description - Department Manager

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Additional Responsibilities:

- Conduct personnel evaluations as needed, at the direction of the Board,
- Handle discipline of personnel in accordance with the “Disciplinary action” policy,
- Evaluate the needs of NSAA related to emergency and pre-hospital care, working to keep NSAA a state-of-the art and progressive service,
- Administer quality assurance tactics to assure excellence with patient care, reporting, and supply inventories,
- Facilitate relationships between NSAA and the local Police/Fire/EMS agencies and the area Emergency Departments,
- Participate in development and delivery of community health initiatives,
- Coordinate the efforts to ensure adequate medical services for the town during large scale incidents and weather emergencies,
- Handle the scheduling needs of the company in accordance with the Scheduling Policy 5-01,
- Budget preparation in conjunction with the Board of Directors,
- Assist in the hiring and training of NSAA employees in accordance with the Application Policy 2-12,
- Other duties as assigned by the President and/or his/her designee.

Job Responsibilities Related to Patient Privacy:

- The Department Manager is expected to protect the privacy of all patient information in accordance with the Company’s privacy policies, procedures, and practices, as required by federal [and state] law, and in accordance with general principles of professionalism as a health care provider. Failure to comply with the Company’s policies and procedures on patient privacy may result in disciplinary action up to and including termination of employment or of membership or association with North Stonington Ambulance Association, Inc.
- The Department Manager may access protected health information and other patient information only to the extent that is necessary to complete your job duties. The Department Manager may only share such information with those who have a need to know specific patient information you have in your possession to complete their job responsibilities related to treatment, payment or other company operations.
- The Department Manager is encouraged and expected to report, without the threat of retaliation, any concerns regarding the Company’s policies and procedures on patient privacy and any observed practices in violation of that policy to the designated Privacy Officer.
- The Department Manager is expected to actively participate in Company privacy training and is required to communicate privacy policy information to coworkers, students, patients and others in accordance with Company policy.

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G-01 Job Description - Department Manager

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Terms:

- Special situations and emergencies may dictate periodic work days/weeks longer than normal
- The work schedule for this position may be adjusted to best suit the needs of the company. These adjustments may include, evening shifts, weekends, and holidays.
- This position is bound to an annual performance review and rating. The results of such review shall be utilized in the guidance and determination of an annual merit increase, if any. Such review may include the scrutiny of all records described above, auditing of funds, and interviewing of subordinates.
- NSAA reserves the right to mandate the Department Manager to work under special circumstances or emergencies outside of the normal schedule. This mandate must have prior approval of (2) of the following: President, Vice President of Operations, Vice President of Administration. Any refusal to work mandated hours must have a written explanation which will be reviewed at the next Board of Directors meeting for possible disciplinary action.

Limitations:

As the employer, NSAA shall practice reasonable limitations with respect to mandating work hours above and beyond what is considered a normal schedule, without further compensation for this position. In order to foster a position that is mutually beneficial, both parties shall periodically review the workload and make agreeable adjustments to the responsibilities or compensations of the position.

Benefits:

This position qualifies for a competitive benefits package that shall include but not be limited to the following:

Health/Life Insurance
Dental and Vision Care Plan or Insurance
403b Pension Plan or similar
Paid Personal Time
Paid Vacation Time
Paid Sick Time

Specific information, including the application and availability of these benefits is covered in **Benefits Policy**.

Disclaimer:

The information provided in this description has been designed to indicate the general nature and level of work performed by the Department Manager within this job. It is not designed to be interpreted, as a comprehensive inventory of all duties, responsibilities, qualifications and working conditions required of employees, assigned to this job. The Board of Directors has sole discretion to add or modify duties of the job and to designate other functions as essential at any time. This job description is not an employment agreement or contract.

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G-02 Benefits

Number: G-02	Created: 07/01/05
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Availability:

The benefits mentioned in this policy are available to the position of Department Manager only. Questions regarding this policy should be directed to the Board of Directors.

Health/Life Insurance:

NSAA shall offer a comprehensive health and Life insurance plan at little or no cost to the employee. This plan shall be available to the employee on the first day of the following month of hire.

Vision and Dental Plan:

A comprehensive Vision and Dental plan shall be covered in a supplemental insurance policy or plan if not already included in the main Health Insurance plan. This plan shall be at little or no cost to the employee and shall be available on the first day of the following month of hire.

403b Pension Plan or similar:

Contents to be developed.

Paid Vacation Time Off:

Vacation time is earned at the following rate:

- First year - 2 weeks (108 hours)
- Second year - 2 weeks (108 hours)
- Third year - 3 weeks (162 hours)
- Fourth year - 3 weeks (162 hours)
- Fifth year and thereafter - 4 weeks (216 hours)

To take vacation time, the Department Manager must request and receive approval from two of the following: President, Vice President of Administration, or Vice President of Operations. Vacation time can be used in a minimum of 6 hour increments.

Requests will be reviewed and granted or denied based on a number of factors, including the operational and staffing requirements of the company.

It is encouraged to use vacation time for rest, relaxation, and personal pursuits. In the event that available vacation time is not used by the end of the anniversary year, sixty (60) hours may be carried forward to the next benefit year with written approval of the Board of Directors. Any vacation time carried forward must be used within the next twelve (12) month period.

Upon termination of employment, if in good standing (i.e. have provided two weeks notice and have not been terminated for cause) the Department Manager shall be paid for unused vacation time that has been earned through the last day of work.

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Paid Sick Time Off:

NSAA shall provide paid sick time off for this position. Paid sick time off is a privilege, not a right. This time off is to be used for illness of the Department Manager. It is not intended as extra vacation or personal time.

The Department Manager is required to notify the President as far in advance as possible if the need to take a sick day arises, so work plans may be adjusted.

This position is entitled to paid time off for periods of temporary absences due to illness or injury, up to a maximum of fifteen (15) days (180 hours) in any twelve (12) month period.

Paid Personal Time Off:

In addition to Paid Vacation Time Off, the Department Manager shall receive twenty-four (24) hours of PTO. NSAA provides these days to allow the Department Manager the flexibility to meet family obligations or emergencies, handle personal business, or celebrate other holidays not recognized by the company.

This time is available on the employee's initial hire date and every year thereafter. All PTO must be used in minimum six (6) hours increments and be of within the year in which it was earned.

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Chapter H: HIPAA

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H-01 Job Description – Privacy Officer

Number: H-01	Created: 04/14/03
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Qualifications:

High school Diploma or GED Equivalent; A working knowledge of the Privacy Rule required.

Maintains current knowledge of applicable federal and state privacy laws and monitors changes in privacy practices for the ambulance industry to ensure current organizational compliance.

Experience working with the public is essential.

Demonstrated organizational, facilitation, communication and presentation skills are necessary

Job Purpose and Summary:

The Privacy Officer oversees all activities related to the development, implementation, and maintenance of North Stonington Ambulance Association, Inc.'s policies and procedures covering the privacy of patient health information. This person serves as the key compliance officer for all federal and state laws that apply to the privacy of patient information, including the federal Health Insurance Portability and Accountability Act of 1996 (HIPAA).

Duties and Responsibilities:

This individual is tasked with the responsibility of ensuring that all of the organization's patient information privacy policies and procedures related to the privacy of, and access to, patient health information are followed.

1. Develop policies and procedures on staff training related to the privacy of patient health information and protected health information;
2. Develop policies on the security of health care information including computer and password security and patient data integrity;
3. Defines levels of staff access to PHI and minimum necessary requirement for staff based on the required job responsibilities;
4. Oversees, directs, delivers, and ensures the delivery of initial and ongoing privacy training and orientation to all staff members, employees, volunteers, students and trainees.
5. Serves as the contact person for the dissemination of PHI to other health care providers;
6. Serves as the contact person for patient complaints and requests;
7. Processes patient requests for access to and amendment of health information and consent forms;

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H-01 Job Description – Privacy Officer

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8. Processes all patient accounting requests;
9. Ensures the capture and storage of patient PHI for the minimum period required by law;
10. Ensures ambulance service compliance with all applicable Privacy Rule requirements and works with legal counsel and other managers to ensure the company maintains appropriate privacy and confidentiality notices and forms and materials.
11. Cooperates with the state and federal government agencies charged with compliance reviews, audits and investigations.

Disclaimer

The information provided in this description has been designed to indicate the general nature and level of work performed by incumbents within this job. It is not designed to be interpreted, as a comprehensive inventory of all duties, responsibilities, qualifications and working conditions required of employees, assigned to this job. Management has sole discretion to add or modify duties of the job and to designate other functions as essential at any time. This job description is not an employment agreement or contract.

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H-02 Designated Record Sets

Number:	H-02	Created:	04/14/03
Page:	1 of 1	Revised:	
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Purpose

To ensure that North Stonington Ambulance Association, Inc. releases Protected Health Information (PHI) in accordance with the Privacy Rule, this policy establishes a definition of what information should be accessible to patients as part of the DRS, and outlines procedures for requests for patient access, amendment, and restriction on the use of PHI.

Under the Privacy Rule, the DRS includes medical records that are created or used by the Company to make decisions about the patient.

Policy

The DRS should only include HIPAA covered PHI, and should not include information used for the operational purposes of the organization, such as quality assurance data, accident reports, and incident reports. The type of information that should be included in the DRS is medical records and billing records.

Procedure

The Designated Record Set

1. The DRS for any requests for access to PHI includes the following records:
 - a. The patient care report or PCR created by EMS field personnel (this includes any photographs, monitor strips, Physician Certification Statements, Refusal of Care forms, or other source data that is incorporated and/or attached to the PCR.
 - b. The electronic claims records or other paper records of submission of actual claims to Medicare or other insurance companies.
 - c. Any patient-specific claim information, including responses from insurance payers, such as remittance advice statements, Explanation of Medicare Benefits (EOMBs), charge screens, patient account statements, and signature authorization and agreement to pay documents.
 - d. Medicare Advance Beneficiary Notices, Notices from insurance companies indicating coverage determinations, documentation submitted by the patient, and copies of the patient's insurance card or policy coverage summary, that relate directly to the care of the patient.
 - e. Amendments to PHI, or statements of disagreement by the patient requesting the amendment when PHI is not amended upon request, or an accurate summary of the statement of disagreement.

The DRS also include copies of records created by other service providers and other health care providers such as first responder units, assisting ambulance services, air medical services, nursing homes, hospitals, police departments, coroner's office, etc., that are used by the Company as part of treatment and payment purposes related to the patient.

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H-03 Security, Levels of Access & Limiting Disclosure of PHI

Number: H-03	Created: 04/14/03
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Purpose

To outline levels of access to Protected Health Information (PHI) for various staff members of North Stonington Ambulance Association, Inc. ("NSAA") and to provide a policy and procedure on limiting access, disclosure, and use of PHI. To provide policies outlining patient rights and NSAA's responsibilities in fulfilling patient requests. Security of PHI is everyone's responsibility.

Policy

NSAA retains strict requirements on the security, access, disclosure and use of PHI. Access, disclosure and use of PHI will be based on the role of the individual staff member in the organization, and should be only to the extent that the person needs access to PHI to complete necessary job functions.

When PHI is accessed, disclosed and used, the individuals involved will make every effort, except in patient care situations, to only access, disclose and use PHI to the extent that only the minimum necessary information is used to accomplish the intended purpose.

Patients may exercise their rights to access, amend, restrict, and request an accounting, as well as lodge a complaint with either North Stonington Ambulance Association, Inc. or the Secretary of the Department of Health and Human Services.

Procedure

Role Based Access:

Access to PHI will be limited to those who need access to PHI to carry out their duties. The following describes the specific categories or types of PHI to which such persons need access is defined and the conditions, as appropriate, that would apply to such access.

Job Title	Description of PHI to Be Accessed	Conditions of Access to PHI
EMT	Intake information from dispatch, patient care reports	May access only as part of completion of a patient event and post-event activities and only while actually on duty
Financial Secretary	Intake information from dispatch, patient care reports, billing claim forms, remittance advice statements, other patient records from facilities	May access only as part of duties to complete patient billing and follow up and only during actual work shift
Supervisor	Intake information from dispatch, patient care reports	May access only as part of completion of a patient event and post-event activities, as well as for quality assurance checks and corrective counseling of staff
Training Coordinator	Intake information from dispatch, patient care reports	May access only as a part of training and quality assurance activities. All individually identifiable patient information should be redacted prior to use in training and quality assurance activities
Executive Board of Directors		May access only to the extent necessary to monitor compliance and to accomplish appropriate supervision and management of personnel

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Access to PHI is limited to the above-identified persons only, and to the identified PHI only, based on the Company's reasonable determination of the persons or classes of persons who require PHI, and the nature of the health information they require, consistent with their job responsibilities.

Access to a patient's entire file will not be allowed except when expressly permitted by company policy or approved by the Privacy Officer.

Disclosures to and Authorizations from the Patient:

You are not required to limit your disclosure to the minimum amount of information necessary when disclosing PHI to other health care providers for treatment of the patient. This includes doctors, nurses, etc. at the receiving hospital, any mutual aid provider, your fellow crewmembers involved in the call, and any other person involved in the treatment of the patient who has a need to know that patient's PHI. In addition, disclosures authorized by the patient are exempt from the minimum necessary requirements unless the authorization to disclose PHI is requested by the Company.

Authorizations received directly from third parties, such as Medicare, or other insurance companies, which direct you to release PHI to those entities, are not subject to the minimum necessary standards.

For example, if we have a patient's authorization to disclose PHI to Medicare, Medicaid or another health insurance plan for claim determination purposes, the Company is permitted to disclose the PHI requested without making any minimum necessary determination.

For all other uses and disclosures of PHI, the minimum necessary rule is likely to apply. A good example of when the minimum necessary rule applies is when your Company conducts quality assurance activities. In most situations it is not necessary to disclose certain patient information such as the patient's name, address, social security number, all PHI of the treated patient, in order to conduct a call review. This sensitive information should be redacted or blacked out from the PCR being used as a Quality Assurance example.

Company Requests for PHI:

If the Company needs to request PHI from another health care provider on a routine or recurring basis, we must limit our requests to only the reasonably necessary information needed for the intended purpose, as described below. For requests not covered below, you must make this determination individually for each request and you should consult your supervisor for guidance. For example, if the request is non-recurring or non-routine, like making a request for documents via a subpoena, we must review the request to make sure it covers only the minimum necessary PHI to accomplish the purpose of the request.

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Holder of PHI	Purpose of Request	Information Reasonably Necessary to Accomplish Purpose
Skilled Nursing Facilities	To have adequate patient records to determine medical necessity for service and to properly bill for services provided	Patient face sheets, discharge summaries, Physician Certification Statements and Statements of Medical Necessity, Mobility Assessments
Hospitals	To have adequate patient records to determine medical necessity for service and to properly bill for services provided	Patient face sheets, discharge summaries, Physician Certification Statements and Statements of Medical Necessity, Mobility Assessments
Mutual Aid Ambulance or Paramedic Services	To have adequate patient records to conduct joint billing operations for patients mutually treated/transported by the Company	Patient care reports

For all other requests, determine what information is reasonably necessary for each on an individual basis.

Incidental Disclosures:

The Company understands that there will be times when there are incidental disclosures about PHI in the context of caring for a patient. The privacy laws were not intended to impede common health care practices that are essential in providing health care to the individual. Incidental disclosures are inevitable, but these will typically occur in radio or face-to-face conversation between health care providers, or when patient care information in written or computer form is left out in the open for others to access or see.

The fundamental principle is that all staff needs to be sensitive about the importance of maintaining the confidence and security of all material we create or use that contains patient care information. Coworkers and other staff members should not have access to information that is not necessary for the staff member to complete his or her job. For example, it is generally not appropriate for field personnel to have access to billing records of the patient.

However, all personnel must be sensitive to avoiding incidental disclosures to other health care providers and others who do not have a need to know the information. Pay attention to who is within earshot when you make verbal statements about a patient's health information, and follow some of these common sense procedures for avoiding accidental or inadvertent disclosures:

Verbal Security:

Waiting or Public Areas: If patients are in waiting areas to discuss the service provided to them or to have billing questions answered, make sure that there are no other persons in the waiting area, or if so, bring the patient into a screened area before engaging in discussion.

Garage Areas: Staff members should be sensitive to that fact that members of the public and other agencies may be present in the garage and other easily accessible areas. Conversations about patients and their health care should not take place in areas where those without a need to know are present.

Other Areas: Staff members should only discuss patient care information with those who are involved in the care of the patient, regardless of your physical location. You should be sensitive to your level of voice and to the fact that others may be in the area when you are speaking. This approach is not meant to impede anyone's ability to speak with other health care providers freely when engaged in the care of the patient. When it comes to treatment of the patient, you should be free to discuss all aspects of the patient's medical

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condition, treatment provided, and any of their health information you may have in your possession with others involved in the care of the patient.

Physical Security :

Patient Care and Other Patient or Billing Records: Patient care reports should be stored in safe and secure areas. When any paper records concerning a patient are completed, they should not be left in open bins or on desktops or other surfaces. Only those with a need to have the information for the completion of their job duties should have access to any paper records.

Billing records, including all notes, remittance advices, charge slips or claim forms should not be left out in the open and should be stored in files or boxes that are secure and in an area with access limited to those who need access to the information for the completion of their job duties.

Computers and Entry Devices: Computer access terminals and other remote entry devices such as PDAs and laptops should be kept secure. Access to any computer device should be by password only. Staff members should be sensitive to who may be in viewing range of the monitor screen and take simple steps to shield viewing of the screen by unauthorized persons. All remote devices such as laptops and PDAs should remain in the physical possession of the individual to whom it is assigned at all times. See the North Stonington Ambulance Association, Inc. Policy on Use of Computer Equipment and Information Systems.

Penalties for Violation:

The Company takes its responsibility to safeguard patient information very seriously. There are significant legal penalties against companies and individuals that do not adhere to the laws that protect patient privacy.

Staff members who do not follow our policies on patient privacy will be subject to disciplinary action, up to and including verbal and written warnings, suspension and/or termination from the organization. The Company shall make every effort to provide remedial education and training as to our policies and procedures when there is a first time violation of our policies.

Questions About This Policy or Any Privacy Issues:

The Company has appointed a Privacy Officer to oversee our policies and procedures on patient privacy and to monitor compliance. The Privacy Officer is also available to you for consultation on any issues or concerns you have about how our Company deals with protected health information. You should feel free to contact the Privacy Officer at any time with your questions or concerns.

The Company will not retaliate against any staff member who expresses a good concern or complaint about any policy or practice related to the safeguarding of patient information and the Company's legal obligations to protect patient privacy.

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H-04 Patient Access, Amendment & Restricting Use of PHI

Number: H-04	Created: 04/14/03
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Purpose

Under the HIPAA Privacy Rule, individuals have the right to access and to request amendment or restriction on the use of their protected health information, or PHI, and restrictions on its use that is maintained in “designated record sets,” or DRS. (See policy on Designated Record Sets).

To ensure that North Stonington Ambulance Association, Inc. only releases the PHI that is covered under the Privacy Rule, this policy outlines procedures for requests for patient access, amendment, and restriction on the use of PHI.

This policy also establishes the procedure by which patients or appropriate requestors may access PHI, request amendment to PHI, and request a restriction on the use of PHI.

Policy

Only information contained in the DRS outlined in this policy is to be provided to patients who request access, amendment and restriction on the use of their PHI in accordance with the Privacy Rule and the Privacy Practices of North Stonington Ambulance Association, Inc.

Procedure

Patient Access:

1. Upon presentation to the business office, the patient or appropriate representative will complete a Request for Access Form.
2. The Company employee must verify the patient’s identity, and if the requestor is not the patient, the name of the individual and reason that the request is being made by this individual. The use of a driver’s license, social security card, or other form of government-issued identification is acceptable for this purpose.
3. The completed form will be presented to the Privacy Officer for action.
4. The Privacy Officer will act upon the request within 30 days, preferably sooner. Generally, the Company must respond to requests for access to PHI within 30 days of receipt of the access request, unless the designated record set is not maintained on site, in which case the response period may be extended to 60 days.
5. If the Company is unable to respond to the request within these time frames, the requestor must be given a written notice no later than the initial due date for a response, explaining why the Company could not respond within the time frame and in that case the Company may extend the response time by an additional 30 days.
6. Upon approval of access, patient will have the right to access the PHI contained in the DRS outlined below and may make a copy of the PHI contained in the DRS upon verbal or written request.

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7. The business office will establish a reasonable charge for copying PHI for the patient or appropriate representative.
8. Patient access may be denied for the reasons listed below, and in some cases the denial of access may be appealed to the Company for review.
9. The following are reasons to deny access to PHI that are not subject to review and are final and may not be appealed by the patient:
 - a. If the information the patient requested was compiled in reasonable anticipation of, or use in, a civil, criminal or administrative action or proceeding;
 - b. If the information the patient requested was obtained from someone other than a health care provider under a promise of confidentiality and the access requested would be reasonably likely to reveal the source of the information.
10. The following reasons to deny access to PHI are subject to review and the patient may appeal the denial:
 - a. If a licensed health care professional has determined, in the exercise of professional judgment, that the access requested is reasonably likely to endanger the life or physical safety of the individual or another person;
 - b. If the protected health information makes reference to another person (other than a health care provider) and a licensed health professional has determined, in the exercise of professional judgment, that the access requested is reasonably likely to cause substantial harm to that person;
 - c. If the request for access is made by a requestor as a personal representative of the individual about whom the requestor is requesting the information, and a licensed health professional has determined, in the exercise of professional judgment, that access by you is reasonably likely to cause harm to the individual or another person.
 - d. If the denial of the request for access to PHI is for reasons a, b, or c, then the patient may request a review of the denial of access by sending a written request to the Privacy Officer.
 - e. The Company will designate a licensed health professional, who was not directly involved in the denial, to review the decision to deny the patient access. The Company will promptly refer the request to this designated review official. The review official will determine within a reasonable period of time whether the denial is appropriate. The Company will provide the patient with written notice of the determination of the designated reviewing official.
 - f. The patient may also file a complaint in accordance with the Procedure for Filing Complaints About Privacy Practices if the patient is not satisfied with the Company's determination.

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H-04 Patient Access, Amendment & Restricting Use of PHI

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11. Access to the actual files or computers that contain the DRS that may be accessed by the patient or requestor should not be permitted. Rather, copies of the records should be provided for the patient or requestor to view in a confidential area under the direct supervision of a designated Company staff member. UNDER NO CIRCUMSTANCES SHOULD ORIGINALS OF PHI LEAVE THE PREMISES.
12. If the patient or requestor would like to retain copies of the DRS provided, then the Company may charge a reasonable fee for the costs of reproduction.
13. Whenever a patient or requestor accesses a DRS, a note should be maintained in a log book indicating the time and date of the request, the date access was provided, what specific records were provided for review, and what copies were left with the patient or requestor.
14. Following a request for access to PHI, a patient or requestor may request an amendment to his or her PHI, and request restriction on its use in some circumstances.

Requests for Amendment to PHI:

1. The patient or appropriate requestor may only request amendment to PHI contained in the DRS. The "Request for Amendment of PHI" Form must be accompanied with any request for amendment.
2. The Company must act upon a Request for Amendment within 60 days of the request. If the Company is unable to act upon the request within 60 days, it must provide the requestor with a written statement of the reasons for the delay, and in that case may extend the time period in which to comply by an additional 30 days.

Granting Requests for Amendment:

1. All requests for amendment must be forwarded immediately to the Privacy Officer for review.
2. If the Privacy Officer grants the request for amendment, then the requestor will receive a letter indicating that the appropriate amendment to the PHI or record that was the subject of the request has been made.
3. There must be written permission provided by the patient so that that the Company may notify the persons with which the amendments need to be shared. The Company must provide the amended information to those individuals identified by having received the PHI that has been amended as well as those persons or business associates that have such information and who may have relied on or could be reasonably expected to rely on the amended PHI.
4. The patient must identify individuals who may need the amended PHI and sign the statement in the Request for Amendment form giving the Company permission to provide them with the updated PHI.
5. The Company will add the request for amendment, the denial or granting of the request, as well as any statement of disagreement by the patient and any rebuttal statement by the Company to the designated record set.

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Denial of Requests for Amendment:

1. The Company may deny a request to amend PHI for the following reasons: 1) If the Company did not create the PHI at issue; 2) if the information is not part of the DRS; or 3) the information is accurate and complete.
2. The Company must provide a written denial, and the denial must be written in plain language and state the reason for the denial; the individual's right to submit a statement disagreeing with the denial and how the individual may file such a statement; a statement that, if the individual does not submit a statement of disagreement, the individual may request that the provider provide the request for amendment and the denial with any future disclosures of the PHI; and a description of how the individual may file a complaint with the covered entity, including the name and telephone number of an appropriate contact person, or to the Secretary of Health and Human Services.
3. If the individual submits a "statement of disagreement," the provider may prepare a written rebuttal statement to the patient's statement of disagreement. The statement of disagreement will be appended to the PHI, or at the Company's option, a summary of the disagreement will be appended, along with the rebuttal statement of the Company.
4. If the Company receives a notice from another covered entity, such as a hospital, that it has amended its own PHI in relation to a particular patient, the ambulance service must amend its own PHI that may be affected by the amendments.

Requests for Restriction:

1. The patient may request a restriction on the use and disclosure of their PHI.
2. The Company is not required to agree to any restriction, and given the emergent nature of our operation, we generally will not agree to a restriction.
3. ALL REQUESTS FOR RESTRICTION ON USE AND DISCLOSURE OF PHI MUST BE SUBMITTED IN WRITING ON THE APPROVED COMPANY FORM. ALL REQUESTS WILL BE REVIEWED AND DENIED OR APPROVED BY THE PRIVACY OFFICER.
4. If the Company agrees to a restriction, we may not use or disclosed PHI in violation of the agreed upon restriction, except that if the individual who requested the restriction is in need of emergency service, and the restricted PHI is needed to provide the emergency service, the Company may use the restricted PHI or may disclose such PHI to another health care provider to provide treatment to the individual.
5. The agreement to restrict PHI will be documented to ensure that the restriction is followed.
6. A restriction may be terminated if the individual agrees to or requests the termination. Oral agreements to terminate restrictions must be documented. A current restriction may also be terminated by the Company as long as the Company notifies the patient that PHI created or received after the restriction is removed is no longer restriction. PHI that was restricted prior to the Company voiding the restriction must continue to be treated as restricted PHI.

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H-05 Procedure for Request for Amendment to PHI

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Purpose

To provide consistent guidelines for North Stonington Ambulance Association, Inc. staff so that they may assist a patient in amending the protected health information (PHI) of their patient care record in accordance with their rights under the federal Privacy Regulations.

Policy

An individual has the right to amend his/her patient care records, as long as their protected health information is maintained by North Stonington Ambulance Association, Inc., except in the following circumstances:

The originator of the record is no longer available.

The information the patient is requesting to amend was not created by North Stonington Ambulance Association, Inc.

The information is not part of the patient care record

The information is accurate and complete

The information would not be available for inspection as provided by law, and therefore North Stonington Ambulance Association is not required to consider an amendment. This exception applies to information compiled in anticipation of a legal proceeding

Information received from someone else under a promise of confidentiality

Procedure

1. Confirm the identity of requestor or legal representative. If the requestor is legal representative, ask for legal proof of their representative status;
2. The patient must fill out the Request for Amendment of Health Information form completely;
3. The Company, with the assistance of legal counsel, will act on the request for amendment within 60 days of the request;

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4. If the Company agrees with the amendment,

Then the record will be amended;

The Company will then notify the individual of the agreement to amend the record;

Copies of the amended record will be provided to our business associates, facilities to or from which we have transported the patient, and others involved in the patient's treatment.

5. If the Company denies the request for amendment,

Then the individual that requested the amendment will be notified of the denial, and the reason for the denial in writing;

A statement will be given to the individual that he/she may submit a short written statement disagreeing with the denial, and how the individual may file such a statement;

A statement will be given to that individual that he/she may, if they do not wish to submit a statement of disagreement, that they may request that the Request for Amendment and the denial become a permanent part of their medical record;

A statement that the individual may complain to the Privacy Officer of the Company at 860-535-1145, or to the federal agency that oversees enforcement of the federal Privacy Rule, the Department of Health and Human Services;

All documentation pertaining to the request for amendment will be kept in the medical record.

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H-06 Medical Records of Employees

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Policy

To provide guidance to management and staff concerning the privacy of medical records which involve staff members of North Stonington Ambulance Association Inc.

Procedure

North Stonington Ambulance Association, Inc. (NSAA) will, to the extent required by law, protect medical records it receives about employees or other staff in a confidential manner. Generally, only those with a need to know the information will have access to it, and, even then, will only have access to as much information as is minimally necessary for the legitimate use of the medical records.

In accordance with laws concerning disability discrimination, all medical records of staff will be kept in separate files apart from the employee's general employment file. These records will be secured with limited access by management.

In accordance with the Privacy Rule of HIPAA, medical records that are not considered employment records will be treated in accordance with the safeguards of the Privacy Rule with respect to their use and disclosure.

Employment records are not considered to be protected health information, or PHI, subject to HIPAA safeguards, including certain medical records of employees that are related to the job. These employment records not covered under HIPAA include, but are not limited to: information obtained to determine my suitability to perform the job duties (such as physical examination reports), drug and alcohol tests obtained in the course of employment, doctor's excuses provided in accordance with the attendance policy, work-related injury and occupational exposure reports, and medical and laboratory reports related to such injuries or exposures, especially to the extent necessary to determine workers' compensation coverage. Nonetheless, despite the fact that such records are not considered HIPAA protected, NSAA will limit the use and disclosure of these records to only those with a need to have access to them, such as certain management staff, the Company's designated physician, and state agencies pursuant to state law.

With respect to staff members of NSAA, only health information that is obtained about staff in the course of providing ambulance or other medical services directly to them is considered PHI under HIPAA. In other words, if North Stonington Ambulance Association Inc. provides ambulance service to an employee, the protections typically given to such information of our ambulance service patients applies to the employee. These protections are subject to HIPAA exceptions, such as in the situation in which the staff member who used NSAA was involved in a work-related injury while on duty.

As another example, if we receive a staff member's medical record in the course of providing the employee with treatment and/or transport, it does not matter that North Stonington Ambulance Association Inc. happens to be the employer – that record is PHI. If, however, the employee submits a doctor's statement to a supervisor to document an absence or tardiness from work, North Stonington Ambulance Association, Inc. does not need to treat that statement as PHI. Other health information that could be treated as employment related, and not PHI, includes medical information that is needed for North Stonington Ambulance Association, Inc. to carry out its obligations under the FMLA, ADA and similar laws, as well as files or records related to occupational injury, disability insurance eligibility, drug screening results, workplace medical surveillance, and fitness-for-duty-tests of employees.

If you have any questions about how medical information about you is used and disclosed by North Stonington Ambulance Association Inc., please contact our Privacy Officer.

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Chapter I: Business Administration

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I-01 Conflicts of Interest

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Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. This policy establishes only the framework within which NSAA wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Contact the Board of Directors for more information or questions about conflicts of interest.

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of NSAA's business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to an officer of NSAA as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which NSAA does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving NSAA.

Any votes by the general membership or Board of Directors must be abstained from by the member involved in the conflict of interest.

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I-02 Outside Service Affiliations

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An employee may hold a job with another organization as long as he or she satisfactorily performs his or her job responsibilities with NSAA. All employees will be judged by the same performance standards and will be subject to NSAA's scheduling demands, regardless of any existing outside work requirements.

If NSAA determines that an employee's outside work interferes with performance or the ability to meet the requirements of NSAA as they are modified from time to time, the employee may be asked to terminate the outside employment if he or she wishes to remain with NSAA.

Outside employment will present a conflict of interest if it has an adverse impact on NSAA.

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I-03 Insurance Coverage

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NSAA maintains \$8,000,000 worth of insurance for all possible risk areas. All employees are covered for malpractice insurance as well as auto and general liability. In addition, all officers and board members are protected under a bond as well as officer liability insurance.