

Student Training Handbook



LiveWell
Community Health Center
Live Life Well

Health Care Collaborative of Rural Missouri

STUDENT TRAINING HANDBOOK
Health Care Collaborative of Rural Missouri
(HCC/LWCHC)
Approved January 2020

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FOREWORD

We at HCC/LWCHC are confident that you will find our organization a dynamic and rewarding place to further your education in health care, and we look forward to a productive and successful association. This handbook has been written to serve as the guide for HCC/LWCHC and Student relationship.

There are several things to keep in mind about this handbook; first, it contains only general information and guidelines. It is not intended to be comprehensive or to address all the possible applications of, or exceptions to, the general policies and procedures described. For that reason, if you have any questions concerning applicability of a policy or practice to you, you should address your specific questions to your Supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer. Neither this handbook nor any other organization document confers any contractual right; either expressed or implied, to remain shadowing or training within the organization. Nor does it guarantee any fixed terms and conditions of your shadowing/training affiliation with HCC/LWCHC.

Your shadowing/training affiliation is for a specific time, with that being said, your involvement with HCC/LWCHC may be terminated at will with or without cause and without prior notice by the organization, or you may vacate your shadowing/training affiliation for any reason at any time. No supervisor or other representative of the organization (except the CEO and Chief Administrative Officer) has the authority to enter into any agreement for extension of shadowing/training for any specified period of time or to make any agreement contrary to the above.

This handbook and its policies are not intended and should not be construed to interfere, limit or prevent a shadowing student/clinical training student from exercising any of his or her rights under the National Labor Relations Act (NLRA) or other applicable law.

The procedures, practices, and policies described here may be modified or discontinued at any time. We will try to inform you of any changes as they occur.

This handbook and the information in it should be treated as confidential. No portion of this handbook should be disclosed to others, except others affiliated with HCC/LWCHC whose knowledge of the information is required in the normal course of business.

DIVERSITY

Diversity and Inclusion Policy

Organization prohibits discrimination in service provision and student practices and is committed to fostering an organization that respects and appreciates diversity and inclusion in its governance, student practices, and service provision. It is the policy of organization to afford equal opportunity administered in compliance with federal, state, and local laws to qualified individuals regardless of their race, color, gender, age, religion, national origin, citizenship, physical or mental abilities or characteristics, sexual orientation, gender identity or expression, genetic information, veteran status, economic status, or other protected group status. Organization complies with all applicable federal, state, and local laws, regulations, and ordinances. In keeping with the intent of this policy, organization will adhere to the following practices:

Governance: The organization will continue to work to recruit individuals who will bring diversity and varying points of view and life experiences to its Board of Directors.

Service Provision: It is further the policy and practice of organization to provide services to all persons regardless of race, color, gender, age, religion, national origin, citizenship, physical or mental abilities or characteristics, sexual orientation, gender identity or expression, genetic information, veteran status, economic status, other protected group status or underserved populations.

Organization adopts a cultural competency philosophy that fosters an environment throughout the organization that recognizes the differences in each of us, capitalizes on our strengths and maximizes our individual and collective potential. Toward this end, organization will seek to assure that its governance, employment, and service provision reflect and promote the diversity of the community and will support efforts to end discrimination and disparities among diverse and underserved populations.

HCC/LWCHC's Anti-harassment Policy and Complaint Procedure

HCC/LWCHC is committed to a training environment in which all individuals are treated with respect and dignity. Each individual has the right to train in a professional atmosphere that promotes equal training opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, HCC/LWCHC expects that all relationships among persons in the office/clinic will be business-like and free of bias, prejudice and harassment.

It is the policy of HCC/LWCHC to ensure equal training opportunity without discrimination or harassment on the basis of race, color, religion, gender, gender identity or expression, sexual orientation, national origin, age, disability, genetic information, marital status, amnesty or status as a covered veteran. HCC/LWCHC prohibits any such discrimination or harassment.

HCC/LWCHC encourages reporting of all perceived incidents of discrimination or harassment to your Supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer. It is the policy of HCC/LWCHC to promptly and thoroughly

investigate such reports. HCC/LWCHC prohibits retaliation against any individual who reports discrimination or harassment or who participates in an investigation of such reports.

Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, sexual harassment is defined, as in the **Equal Employment Opportunity Commission Guidelines**, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's training; b) submission to or rejection of such conduct by an individual is used as the basis for training decisions affecting such individual; or c) such conduct has the purpose or effect of unreasonably interfering with an individual's training performance or creating an intimidating, hostile or offensive training/working environment.

Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal, written or physical conduct that belittles or shows hostility or aversion toward an individual because of his/her race, color, religion, gender, gender identity or expression, sexual orientation, veteran status, national origin, age, disability, marital status, citizenship, genetic information or any other characteristic protected by law or that of his/her relatives, friends or associates, and that; a) has the purpose or effect of creating an intimidating, hostile or offensive training/work environment; b) has the purpose or effect of unreasonably interfering with an individual's training/work performance; or c) otherwise adversely affects an individual's training opportunities.

Harassing conduct includes epithets, slurs or negative stereotyping; gossiping, threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is placed on walls or elsewhere on the organizations premises or circulated in the clinic/office, on organization time or using organization equipment via e-mail, phone (including voice messages), text messages, tweets, blogs, social networking sites or other means.

These policies apply to all training applicants and active training students, whether related to conduct engaged in by HCC/LWCHC employees or someone not directly connected to HCC/LWCHC (e.g., an outside vendor, consultant or customer).

Conduct prohibited by these policies is unacceptable in the office/clinic setting and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

Individuals who believe they have been the victims of conduct prohibited by this policy statement or who believe they have witnessed such conduct should discuss their concerns with their immediate Supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer.

When possible, HCC/LWCHC encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that his or her behavior is unwelcome and request that it be discontinued. Often this action alone will resolve the problem. HCC/LWCHC recognizes, however, that an individual may prefer to pursue the matter through complaint procedures.

HCC/LWCHC encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken before relationships become irreparably strained. Therefore, although no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment.

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately.

If a party to a complaint does not agree with its resolution, that party may appeal to their Supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer.

False and malicious complaints of harassment, discrimination or retaliation may be the subject of appropriate disciplinary action and/or termination of training affiliation.

Americans with Disabilities Act (ADA) and the ADA Amendments Act (ADAAA)

The Americans with Disabilities Act (ADA) and the Americans with Disabilities Amendments Act, known as the ADAAA, are federal laws that prohibit employers with 15 or more employees from discriminating against applicants and individuals with disabilities and that when needed provide reasonable accommodations to applicants and employees who are

qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position.

It is the policy of HCC/LWCHC to comply with all federal and state laws concerning the training of students with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC). Furthermore, it is our organization policy not to discriminate against qualified individuals with disabilities in regard to application procedures, discharge, training or other terms, conditions and privileges of training affiliation.

The organization will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation and/or if the accommodation creates an undue hardship to HCC/LWCHC. Contact your Supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer with any questions or requests for accommodation.

Immigration Reform and Control Act

HCC complies with the Immigration Reform and Control Act, employing only those persons who are legally eligible to work in the United States.

HCC complies with the Immigration Reform and Control Act of 1986 by training only U. S. citizens and non-citizens who are authorized to work in the United States. All students are asked on their first day of training to provide original documents verifying their right to work in the United States and to sign a verification form required by federal law (INS Form I-9). If an individual cannot verify his or her right to work within three days of their training, HCC must terminate his or her training affiliation.

Please contact the your Supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer with questions or concerns.

STUDENT AFFILIATION REQUIREMENTS

Background Checks

HCC carefully selects quality training students. Background checks help to ensure that new training students have the skills for the job and have performed well in the past.

HCC conducts background checks on all training student candidates after an affiliation agreement has been extended. A background check may also be completed during reassignment of an employee. A third-party administrator may be used to conduct the background checks, and all background checks will be compliant with applicable laws, such as the Fair Credit Reporting Act.

The information that may be collected includes, but is not limited to:

- Criminal background
- Employment history

- Education
- Credit
- Professional and personal references

Criminal background checks may not be used as the sole reason for denying training opportunities, unless it is job-related. Regardless, HCC has the right to make the final decision about training an individual after the background check is complete.

Information obtained from the background check process, including information from professional and personal references, will be used by HCC only as part of the training affiliation process and will be kept confidential.

Progressive Discipline

Every student has the duty and the responsibility to be aware of and abide by existing rules and policies. Students also have the responsibility to perform his/her duties to the best of his/her ability and to the standards as set forth prior to their training at HCC/LWCHC.

HCC/LWCHC supports the use of progressive discipline to address issues such as poor training/work performance, including unsatisfactory attendance or misconduct. Our progressive discipline policy is designed to provide a corrective action process to improve and prevent a recurrence of undesirable behavior and/or performance issues. Our progressive discipline policy has been designed consistent with our organizational values, student training practices and laws. HCC/LWCHC reserves the right to combine or skip steps in this process depending on the facts of each situation and the nature of the offense. The level of disciplinary intervention may also vary. Some of the factors that will be considered are whether the offense is repeated despite coaching, counseling and/or training; the student's work record; and the impact the conduct and performance issues have on our organization.

HCC/LWCHC reserves the right to determine the appropriate level of discipline for any inappropriate conduct, including oral and written warnings, suspension and discharge.

Separation of Training Affiliation

Separation of Training Affiliation within an organization can occur for several different reasons:

- **Training Abandonment:** Students who fail to report to their designated office space/clinic or contact their supervisor for three (3) consecutive workdays shall be considered to have abandoned their training without notice, effective at the end of their normal shift on the third day. The supervisor shall notify the Chief Clinical and Risk Officer or the Chief Administrative Officer at the expiration of the third workday and initiate the paperwork to terminate the student. Students who are separated due to training abandonment are ineligible to train with HCC/LWCHC in the future.
- **Training Termination:** Students who train at HCC/LWCHC are trained on an at-will basis, and the organization retains the right to terminate a student at any time.

The separating student must return all organization property at the time of separation, if provided with any.

All supplies, materials and work products of a student, if purchased by HCC/LWCHC, remain the property of HCC/LWCHC after discharge. The student may retain any personal files.

Former students who left HCC/LWCHC in good standing and were classified as eligible for training in the future may be considered for further training if necessary or desired. An application must be submitted to the Operations department, and the applicant must meet all minimum qualifications and requirements of the position, including any qualifying exam, when required.

WORKPLACE SAFETY

Drug and Alcohol Testing

HCC is committed to protecting the safety and well-being of all students training in our organization. We recognize that alcohol abuse and drug abuse pose a significant threat to our goals. For this reason, we have established a drug-free workplace policy that balances our respect for individuals with the need to maintain an alcohol and drug-free environment.

Any individual who is affiliated with HCC or applies to train with HCC is covered by our drug-free workplace policy. Our policy includes, but is not limited to, full-time employees, part-time employees, volunteers, contractors, interns, clinical training students and applicants. Our drug-free workplace policy is intended to apply whenever anyone is representing or conducting business for HCC. Therefore, this policy applies during all working hours, whenever an individual is conducting business or representing HCC, and while an individual is on call, on company property and at company-sponsored events.

It is a violation of this policy to use, sell, possess, trade and/or offer to sell alcohol, illegal drugs or intoxicants. In accordance with the federal Drug-Free Workplace Act, individuals convicted of a criminal drug violation, including misdemeanors, occurring on company property or company time must notify HCC within five calendar days of the conviction. This includes any findings of guilt, pleas of "no contest" and impositions of fines, jail sentences or other penalties. HCC will take appropriate action within 30 days of notification. Federal contracting agencies will be notified when appropriate.

Disciplinary Actions

Students who test positive for drugs and/or alcohol, or who refuse to submit to testing, will be subject to disciplinary action(s), up to and including termination. A student who tests positive for drugs and/or alcohol will be required to complete any (or all) of the following actions before he or she is allowed to return to the organization:

- Sign the Rehabilitation Agreement form
- Successfully complete an assessment and/or treatment for drug and/or alcohol abuse
- Receive a certification issued by a qualified medical professional stating that he or she is free from drug and/or alcohol use

- Take a drug and/or alcohol test, receive negative test results and consent to follow-up testing

Testing

Students may be subject to random drug and alcohol testing at any time, with or without notice. To ensure accuracy and fairness, all testing will be conducted according to Substance Abuse and Mental Health Services Agency (SAMHSA) guidelines, where applicable and will include a screening test; a confirmation test; the opportunity for a split sample; review by a Medical Review Officer, including the opportunity for students who test positive to provide a legitimate medical explanation, such as a physician's prescription, for the positive result; and a documented chain of custody.

All drug-testing information will be maintained in separate confidential records.

- *Reasonable Suspicion Testing:* If there is suspicion that a student is under the influence of drugs and/or alcohol while on company property or time, the student will be required to take a drug and/or alcohol test. Reasonable suspicion will be based on observable instances or actions such as, but not limited to, the following:
 - Dangerous conduct
 - Unexplained decrease in job performance
 - Hostile interpersonal relations
 - Possession of drug paraphernalia
 - Noticeably reduced short-term memory
 - Physical symptoms (including bloodshot eyes, slurred speech and vomiting)
 - Anxiety
 - Inability to concentrate
- *Follow-up Testing:* Students who have tested positive for drugs and/or alcohol, and students who have attended drug and/or alcohol-related counseling may not return to work until they have been evaluated by a medical professional in a substance abuse treatment facility and have successfully passed a drug and/or alcohol test. Students who return to HCC will be subject to follow-up tests, all of which will be unannounced.

Any student who tests positive may be immediately removed from duty.

Each of the following actions constitutes a refusal to submit to testing:

- Failure to provide an adequate urine, blood, breath or saliva specimen for a drug and/or alcohol test without a valid medical explanation
- Failure to be escorted to a testing facility
- Tampering with, adulterating or diluting a specimen
- Refusing to sign a Chain of Custody form at the testing facility

Students do have the option to refuse to submit to drug and/or alcohol tests; however, doing so will constitute a violation of this policy. Refusal to take a drug and/or alcohol test will also be considered a positive test result, which subjects the student to disciplinary action(s).

Student who apply, who are asked to submit to a drug and/or alcohol test and who refuse to submit to drug and/or alcohol testing will be not considered for training with HCC/LWCHC.

Collection of Specimens and Testing

HCC subscribes to the collection and testing procedures outlined by SAMHSA. This protocol protects the privacy and confidentiality of the student. Under certain circumstances, protocol requires that specimen donors provide a fresh specimen in the presence of a witness; however, this only occurs if there is suspicion of any of the following:

- The specimen is not from the donor.
- The specimen was altered or tampered with,
- The collection is part of a post-treatment monitoring program.
- The donor adulterated the previous specimen.

All specimens collected for drug and/or alcohol testing will be processed using students' Social Security numbers as identification to ensure confidentiality.

Necessary Forms

Specimens will be tracked using a Custody and Control Form from the point of submission through destruction. Students submitting specimens will be required to sign the Custody and Control Form. If a student does not sign this form, a retest will be requested. A student who refuses to sign after it is requested of him/her will be considered as having refused testing and will be subject to disciplinary action.

Laboratory Testing

All drug and/or alcohol testing will be conducted in a laboratory certified by Department of Health and Human Services (HHS), according to the following procedures: (1) specimens will be screened for amphetamines, benzoylecgonine (cocaine), opiates, phencyclidine (PCP) and tetrahydrocannabinol (THC or marijuana); and (2) test results will be confirmed by gas chromatography/mass spectrometry (GC/MS). HCC reserves the right to test for other substances as well.

No specimen will be considered positive until it has been confirmed at the level established by HHS. If no established levels have been set by HHS for a tested substance, HCC will hold the testing facility responsible for establishing an acceptable level.

Test results for alcohol revealing a blood alcohol content of .04 or greater will be considered positive.

Results

Positive test results will be reported to the Medical Review Officer (MRO), who will then contact the student to discuss the results. Should the MRO be unable to contact the employee, he or she will contact HCC for assistance. If the MRO cannot make contact with the student within five days of testing or the results reveal a major safety concern, the MRO may disclose positive test results to HCC. At that point, HCC reserves the right to take the student off active duty until the MRO is able to contact the student. When the MRO does contact the student, and only if he or she can provide a viable reason for why the test came back positive, then the positive test result will be reported to HCC as negative.

Use of Prescription Medications

Nothing in this policy prohibits the appropriate use of prescription medication as legally prescribed by a licensed physician. If an employee is taking prescription medication with potential side effects that may infringe on the safety of the student or others, he or she must notify HCC. Failure to do so may result in disciplinary action, up to and including termination.

HCC may contact the student's physician to investigate whether it is necessary to impose restrictions on job duties as a result of the student's use of prescription medication. If HCC and the physician determine that the student should be removed from performing his or her job duties, HCC will notify the student immediately.

Confidentiality

Results of all drug and/or alcohol testing will be kept separate from student personnel files and treated as confidential information. No results, whether positive or negative, will be shared with anyone outside of the student's direct supervisory chain of command, except when necessary for treatment or physician confirmation purposes.

HCC/LWCHC prohibits all students from manufacturing, distributing, dispensing, possessing or using an illegal drug in or on organization premises or while conducting organization business. Students are also prohibited from misusing legally prescribed or over-the-counter (OTC) drugs. Law enforcement personnel shall be notified, as appropriate, when criminal activity is suspected.

NOTE: HCC may disclose the results of a drug and/or alcohol test to decision-makers in a lawsuit, grievance or other proceeding initiated by or on behalf of the student.

Bullying

HCC/LWCHC defines bullying as "repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of training." Such behavior violates the organization Code of Conduct, which clearly states that all students and employees will be treated with dignity and respect.

The purpose of this policy is to communicate to all students, including employees, directors and executives, that the organization will not tolerate bullying behavior. Students found in violation of this policy will be disciplined up to and including termination.

Bullying may be intentional or unintentional. However, it must be noted that where an allegation of bullying is made, the intention of the alleged bully is irrelevant and will not be given consideration when delivering discipline. As in sexual harassment, it is the effect of the behavior upon the individual that is important. HCC/LWCHC considers the following types of behavior examples of bullying:

- **Verbal bullying:** Slandering, ridiculing or maligning a person or his/her family; persistent name calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.

- **Physical bullying:** Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault; damage to a person's work area or property.
- **Gesture bullying:** Nonverbal threatening gestures or glances that convey threatening messages.
- **Exclusion:** Socially or physically excluding or disregarding a person in work-related activities.

Violence in the Organization

All students, employees, patients, members, customers, vendors and business associates must be treated with courtesy and respect at all times. Students are expected to refrain from conduct that may be dangerous to others.

Conduct that threatens, intimidates or coerces another student, employee, patient, member, customer, vendor or business associate will not be tolerated. HCC/LWCHC resources may not be used to threaten, stalk or harass anyone at the workplace or outside the workplace. HCC/LWCHC treats threats coming from an abusive personal relationship as it does other forms of violence.

Indirect or direct threats of violence, incidents of actual violence and suspicious individuals or activities should be reported as soon as possible to your Supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer. When reporting a threat or incident of violence, the student should be as specific and detailed as possible. Students should not place themselves in danger, nor should they attempt to intervene during an incident.

Students should promptly inform the Chief Team of any protective or restraining order that they have obtained that lists the workplace as a protected area. Students are encouraged to report safety concerns with regard to intimate partner violence. HCC/LWCHC will not retaliate against students making good-faith reports. HCC/LWCHC is committed to supporting victims of intimate partner violence.

HCC/LWCHC will promptly and thoroughly investigate all reports of threats of violence or incidents of actual violence and of suspicious individuals or activities. The identity of the individual making a report will be protected as much as possible. HCC/LWCHC will not retaliate against students making good-faith reports of violence, threats or suspicious individuals or activities. In order to maintain workplace safety and the integrity of its investigation, HCC/LWCHC may suspend students suspected of workplace violence or threats of violence pending investigation.

Anyone found to be responsible for threats of or actual violence or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action up to and including termination. Likewise, anyone found to be responsible for fabricating false threats or violence will be subject to disciplinary action.

HCC/LWCHC encourages students to bring their disputes to the attention of their supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer, before the situation escalates. HCC/LWCHC will not discipline students for raising such concerns.

Safety

It is the responsibility of each student to conduct all tasks in a safe and efficient manner complying with all local, state and federal safety and health regulations and program standards, and with any special safety concerns for use in a particular area or with a client.

Although most safety regulations are consistent throughout each department and program, each student has the responsibility to identify and familiarize her/himself with the emergency plan for his/her working area. Each facility shall have posted an emergency plan posted detailing procedures in handling emergencies such as fire, weather-related events and medical crises.

It is the responsibility of the student to complete an Accident and Incident Report for each safety and health infraction that occurs by an employee or student or that the employee or student witnesses. Failure to report such an infraction may result in student disciplinary action, up to and including termination.

Furthermore, management requires that every person in the organization assumes the responsibility of individual and organizational safety. Failure to follow organization safety and health guidelines or engaging in conduct that places the employee, student, client or organization property at risk can lead to student disciplinary action and/or termination.

Smoke and Tobacco Free Workplace

It is the policy of HCC/LWCHC to prohibit smoking and tobacco on all organization premises in order to provide and maintain a safe and healthy work environment for all employees and Students. The law defines smoking as the "act of lighting, smoking or carrying a lighted or smoldering cigar, cigarette, e-cigarette, smokeless tobacco or pipe of any kind."

The smoke and tobacco free workplace policy applies to all areas of organization buildings, organization-sponsored off-site conferences and meetings, vehicles owned or leased by the organization, visitors including patients, customers and vendors, contractors and consultants and/or their employees working on the organization premises and all employees, temporary employees and student who are training with HCC/LWCHC.

Smoking is permitted in parking lots only and at least 100 feet away from entrances to buildings. Students who violate the smoke and tobacco free policy will be subject to disciplinary action up to and including immediate termination.

TRAINING EXPECTATIONS

Attendance and Punctuality

Timely and regular attendance is an expectation of performance for all HCC/LWCHC shadowing students/training students.

Patterns of absenteeism or tardiness may result in HCC/LWCHC reporting to the shadowing student's/training student's school/university.

Students are expected to notify their supervisor if they will be late, will not be in at all, or are requesting planned time away. Students who are notifying their supervisor that they will not be in for the day need to contact and speak with their supervisor via phone no less than 1 hour prior to the start of their shift (example: shift starts at 8am, supervisor needs to be contacted no later than 7am).

Attire and Grooming

It is important for all students to project a professional image while shadowing/training by being appropriately dressed. HCC/LWCHC shadowing students/training students are expected to be neat, clean and well-groomed while in the clinic/office setting. Clothing must be consistent with the standards for a business environment and must be appropriate to the type of work being performed.

Piercings other than ears should be removed prior to entering the facility. Tattoos should be concealed by clothing when possible. If it cannot be covered by clothing, a bandage should be applied over the tattoo during shadowing/training hours. Hairstyles, facial hair and makeup should be conservative and in neat appearance. Fingernails should be clean and at a length determined by the respective director. Proper hygiene and the use of deodorant are expected. Cologne or perfume should not be in excess. Students that are not in compliance with the dress code may be asked to go home and change into appropriate attire. Failure to comply with the dress code may result in being asked to leave the facility for the remaining shadowing/training experience. Jeans may be worn on Fridays with the exception of board meeting days. They should be appropriate fitting and in good condition.

Non-Clinical students should dress in appropriate business casual attire according to the student's position. Clothing should be clean, properly fitting, wrinkle free and in good repair (not frayed or torn). Skirts and dresses should be finger-tip length or longer. Shirts and blouses should be at a length long enough to tuck in or cover the entire abdomen. Undergarments should be worn and not visible.

Clinical students should dress in appropriate scrubs or appropriate business casual attire. In the clinic setting all shoes must be closed toe.

HCC/LWCHC is confident that all students will use their best judgment regarding attire and appearance. Executive Leadership reserves the right to determine appropriateness. Any student who is improperly dressed will be counseled or in severe cases may be sent home to change clothes. Continued disregard of this policy may be cause for disciplinary action, which may result in terminating the shadowing/training contract between student and HCC/LWCHC.

Personnel Files

Shadowing Students/Training Students files are maintained by the Chief Administrative Officer and are considered confidential. Supervisors may only have access to personnel file information on a need-to-know basis.

Representatives of government or law enforcement agencies, in the course of their duties, may be allowed access to file information.

Confidentiality and Publicity

As a result of your involvement at HCC/LWCHC, you may acquire and have access to confidential information belonging to the organization of a special and unique nature and value, relating to such matters as the organization's personnel information; procedures; handbooks; organizational plans; existing and potential business opportunities for HCC/LWCHC; as well as information specific to HCC/LWCHC's business.

As a condition of your shadowing/training affiliation, you agree that all such information is the exclusive property of HCC/LWCHC and that you will not at any time divulge or disclose to anyone, except in the responsible exercise of your job, any such information, whether or not it has been designated specifically as "confidential".

If you are ever asked any information or comments from a newspaper, radio, television, or other news reporter relating to your affiliation, or any other matter pertaining to HCC/LWCHC, refer the person making the inquiry to your Supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer.

Conflicts of Interest

Students must avoid any relationship or activity that might impair, or even appear to impair, their ability to make objective and fair decisions when performing their jobs. At times, a student may be faced with situations in which business actions taken on behalf of HCC/LWCHC may conflict with the student's own personal interests. Organization property, information or business opportunities may not be used for personal gain.

Conflicts of interest could arise in the following circumstances:

- Being employed by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while training with HCC/LWCHC.
- Being supervised by family members or closely related persons.
- Serving as a board member for an outside commercial organization or organization.
- Owning or having a substantial interest in a competitor, supplier or contractor.
- Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all organization students.

Students with a conflict-of-interest question should seek advice from their Supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, students must seek review from their Supervisor, the Chief Clinical and Risk

Officer, or the Chief Administrative Officer.

Code of Conduct

It is expected that students and others will conduct themselves in a manner which enhances the care, services, collaborative partners, and the image of the overall organization. All individuals will be treated with dignity and respect. Examples of expected behaviors include, but not limited to:

- Regular and punctual attendance
- Courteous interactions with members, patients, customers, co-workers, clients and visitors
- Quiet and orderly conduct
- Conscientious attention to duty
- Delivery of quality care and services
- Performance which reflects attention to the needs of our members and support the facility and mission.

For the protection and well-being of clients, as well as visitors, students and employees, certain behaviors cannot be tolerated. Examples of behaviors, but not limited to, which are unacceptable and will not be tolerated include:

- Dishonesty
- Use or possessing of illegal or intoxicating substances while on facility premises, or being under the influence of such substances while on facility premises
- Refusal to perform assigned duties
- Breach of confidentiality
- Falsification of any organization records or documents
- Abuse or neglect of members
- Threatening or intimidating members, visitors, co-workers or others including inappropriate behavior as defined in the Workplace Bullying Policy
- Violation of Safety standards
- Sexual and other forms of harassment
- Unlawful possession of firearms and/or weapons of any kind in the workplace, in organization vehicles or while on HCC/LWCHC business
- Carelessness
- Failure to perform to job and/or facility standards
- Willful misconduct
- Absence without notice, or absence that is unexcused
- Failure to comply with dress and/or hygiene/grooming standards
- Attending to personal matters on organization time
- Actions or attitudes which adversely affect HCC/LWCHC operation, members or others

Whistleblower Policy

This policy is intended to encourage HCC/LWCHC's training students to report suspected or actual violations of state or federal law without fear of retaliation and to enable students to raise serious concerns within HCC/LWCHC prior to seeking resolution outside HCC/LWCHC.

HCC/LWCHC requires Board Directors, officers, employees, and students to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As training students and representatives of HCC/LWCHC, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. It is the responsibility of all executive board directors, officers, employees, and training students to report violations or suspected violations in accordance with the Whistleblower Policy.

Any Director, officer, employee, or student who in good faith reports a violation shall not suffer harassment, retaliation or adverse consequence. A student who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of affiliation. This Whistleblower Policy is intended to encourage and enable students and others to raise serious concerns within HCC/LWCHC prior to seeking resolution outside of the organization.

At any point in the process an individual with a complaint coming forward under the provisions of the Whistleblower Policy, may contact an outside organization retained by HCC/LWCHC to enable independent support with assisting in investigations.

Beyond HR Solutions, (www.beyond-hrs.com) is the service provider HCC/LWCHC has engaged for this service. The number to call is: 913-209-9115.

The HCC/LWCHC has an open door policy and suggests that students and others share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, your Supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer are in the best position to address the area of concern. However, if the student is not comfortable speaking with their Supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer he/she is encouraged to speak with someone on the Chief Team whom they are comfortable approaching. The Board Members are required to report suspected violations to the CEO, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with HCC/LWCHC's open door policy, individuals should contact the Chief Team directly.

HCC/LWCHC's CEO is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at its discretion, shall advise the Board Chairperson. The CEO has direct access to the Chief Team and is required to report to the Board Chairperson at least annually on compliance activity.

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the formation disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and

which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Violations or suspected violations may be submitted on a confidential basis by the complainant or submitted anonymously. Reports of violations or suspected violations will be kept confidential to extent possible, consistent with the need to conduct an adequate investigation.

The Supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Social Media—Acceptable Use

This policy covers use of various social media platforms and programs, including but not limited to blogs, Twitter, LinkedIn, Facebook, MySpace, product or service review sites like CitySearch, Yelp, etc. We understand that some students may maintain social media sites or profiles or may contribute posts to the sites or profiles of other people, businesses, or groups. It is important to understand that posts, images, tweets, and messages and e-mail can be re-sent around the world. Even if you take precautions to restrict access to your site, posts, or profile, it is possible that someone—perhaps even someone who is permitted to view the site—can copy it and use it in a way you did not intend. To protect HCC's interests, we expect that students who maintain or contribute to social media sites will abide by the following guidelines, as well as practice common sense.

- HCC's equipment, including computers, internet access, and electronic and digital systems and storage, are *not* to be used for students' personal social media. Working time should not be spent updating or creating personal social media posts, sites, and spaces.
- When posting (which includes but is not limited to a blog post, a comment or wall post, status updates, modification of your profile, or "tweeting") about your work at home on your own time, you must abide at all times with all legal and ethical requirements, as well as HCC's policies regarding non-harassment and other matters including those governing the confidentiality of HCC's information and information of or about HCC's clients/customers/patients.
- You may not disclose confidential or other inside information about HCC, its clients, customers, patients or its employees that you learn in the course of your training experience.
- You may not use any materials belonging to HCC, including our promotional and marketing materials, without the written permission of your Supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer.
- You should assume that people, including co-workers, supervisors, clients, customers, patients and their family members, are reading your postings.
- Be respectful. You may not make discriminatory, defamatory, libelous or slanderous comments when discussing HCC, its officers, your supervisors or co-workers, our clients/customers/patients, or our competitors.

- HCC may address as a disciplinary issue any language that you post in a blog or a social media site that reflects negatively on your work ethic or your level of commitment to and compassion for our clients/customers/patients.
- Nothing in this policy is intended to prohibit, nor should it be interpreted as prohibiting, students from engaging in communications with other company employees/students concerning working conditions or issues.
- HCC strives to provide the best service and work environment possible. We welcome your concerns and suggestions for improvement. You should bring these to your Supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer.
- We hope that our clinical and shadowing students would recommend our products and services. However, HCC does not encourage said students to “guerilla market” our services online. If you—or someone in your immediate family, like a spouse, parent, child, or sibling—do make any such recommendation or review, the review must disclose the affiliation relationship.

HCC may monitor content out on the Internet. Policy violations may result in discipline up to and including termination of affiliation.

Cell Phone Policy

Students are expected to exercise discretion in using cell phones and organization phones for personal use. Students should restrict personal calls during work hours. Calls should be made and received on personal time unless an emergency. Some staff members are required to use their cell phone to conduct daily business and are an exception to this policy.

Cell phones are to be kept in a desk drawer or purse except for during lunch breaks and personal time. It is the student's responsibility to make sure their phones are secure. HCC/LWCHC will not be liable for the loss of any device. Cell phones should be placed in silent mode during the workday. The use of cell phones while driving on organization time is prohibited. First violation is a discussion between the supervisor and student, second violation is a verbal warning, third violation is a written warning and the fourth violation could be termination.

Solicitations, Distributions and Posting of Materials

HCC/LWCHC prohibits the solicitation, distribution and posting of materials on or at organization property by any student, except as may be permitted by this policy. The sole exceptions to this policy are charitable and community activities supported by HCC/LWCHC management and organization-sponsored programs related to HCC/LWCHC's products and services.

Provisions:

- Students may not solicit employees or other students or distribute literature of any kind on organization premises at any time.
- Employees may only admit nonemployees to work areas with management approval or as part of an organization-sponsored program. These visits should not disrupt workflow. An employee must accompany the nonemployee at all times. Former

employees are not permitted onto organization property except for official organization business.

- Students may not solicit employees or other students during work times, except in connection with an organization-approved or sponsored event.
- Students may not distribute literature of any kind during work times or in any work area at any time, except in connection with an organization-sponsored event.
- The posting of materials or electronic announcements are permitted with approval from your Supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer.

Violations of this policy should be reported to your Supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer.

HOLIDAYS

Recognized Holidays

HCC/LWCHC recognizes seven holidays each year:

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Day After Thanksgiving
- Christmas Day

If a holiday falls on Sunday, the following Monday will be observed as a holiday; if the holiday falls on Saturday, the preceding Friday will be observed as a holiday.

LEAVE

Leave Expectations

If for any reason at any time throughout the students training affiliation they need to take a leave of absence such as medical or personal leave, bereavement leave, jury duty leave, voting or election leave, etc., they must inform their immediate supervisor. By making their supervisor aware of their leave, their supervisor will have the opportunity to plan differently for their day, if need be. The students will also be expected to make their immediate supervisor aware of when they will be returning to their training duties. Failure to follow these expectations can result in HCC reporting to your school or university.

Training Restoration

There are no training restoration rights associated with leave. However, HCC will make every attempt to reinstate a student with the same preceptor upon his or her return if possible. In the event this cannot be done, the student will receive written notice as soon as the determination has been made and no later than the student's scheduled return date.

Student Training Handbook Acknowledgment and Receipt

The student training handbook describes important information about HCC/LWCHC, and I understand that I should consult my Supervisor, the Chief Clinical and Risk Officer, or the Chief Administrative Officer regarding any questions not answered in the handbook. I have entered into my training affiliation with HCC/LWCHC voluntarily and acknowledge that there is a specified length of training that was set between HCC/LWCHC and myself. **Accordingly, either I or HCC/LWCHC can terminate the relationship at will, with or without cause, at any time, so long as there is not violation of applicable federal or state law.**

I understand and agree that, other than the CEO and Vice President of Operations and the Chief Administrative Officer of the organization, no manager, supervisor or representative of HCC/LWCHC has any authority to enter into any agreement for employment; only the CEO and Chief Administrative Officer of the organization has the authority to make any such agreement and then only in writing signed by the CEO or Vice President of Operations or Chief Administrative Officer of HCC/LWCHC. The CEO and Vice President of Operations is charged with interpretation of the handbook for all implementation purposes.

This handbook and the policies and procedures contained herein supersede any and all prior practices, oral or written representations, or statements regarding the terms and conditions of my training with HCC/LWCHC. By distributing this handbook, the organization expressly revokes any and all previous policies and procedures that are inconsistent with those contained herein.

I understand that, except for employment-at-will status, any and all policies and practices may be changed at any time by HCC/LWCHC, and the organization reserves the right to change my hours and working conditions at any time. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify or eliminate existing policies. Only the CEO or Chief Administrative Officer of HCC/LWCHC has the ability to adopt any revisions to the policies in this handbook.

I understand and agree that nothing in the Student Training Handbook creates, or is intended to create, a promise or representation of continued training and that my training at HCC/LWCHC is training at will, which may be terminated at the will of either HCC/LWCHC or myself. Furthermore, I acknowledge that this handbook is neither a contract of employment nor a legal document. I understand and agree that training with HCC/LWCHC may be terminated with or without cause and with or without notice at any time by HCC/LWCHC or myself.

I have received the handbook, and I understand that it is my responsibility to read and comply with the policies contained in this handbook and any revisions made to it.

Student's Signature

Student's Name (Print)

Date

TO BE PLACED IN STUDENT'S PERSONNEL FILE