



Personnel Handbook

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Section 1: Organizational Information

Applicable to All Personnel

Welcome to our Organization

We are happy to welcome you to Pafford EMS. Since 1967, our organization is devoted to helping others and we need caring and compassionate team members to further our mission of service. We want you to feel that your association with Pafford EMS will be beneficial to both you and the organization.

You have joined an organization that has established an outstanding reputation for high quality patient care and medical transportation services. Maintaining this reputation is a responsibility of all of our personnel. We hope you will find satisfaction and take pride in the organization and your involvement here.

This Personnel Handbook provides answers to many of the questions you may have about your work here. This includes our responsibilities to you as an organization, as well as your responsibilities to Pafford EMS as a staff member. If anything is unclear, please discuss the matter with the appropriate supervisory or management staff person.

You are responsible for reading and understanding this Handbook, and your performance evaluations may reflect your adherence to our Policies, including those outlined in this Handbook. When completing Pafford EMS's onboarding documents, you will also be asked to sign an acknowledgment statement indicating your receipt of this Handbook. In addition to clarifying responsibilities, we hope this Personnel Handbook also gives you an indication of Pafford EMS's interest in the welfare of all who work for or belong to this organization.

Compensation and personal satisfaction gained from helping others and in doing a job well are only some of the reasons most people work for Pafford EMS. Most likely, many other factors count among your reasons for joining Pafford EMS: pleasant relationships, good working conditions, the chance to help the community, career development, and promotion opportunities are just a few. Pafford EMS is committed to doing its part to help assure you of a satisfying experience.

We extend to you our best wishes for your success at Pafford EMS!

Introduction to this Handbook

If you are a new staff member, you will be going through a period of adjustment at Pafford EMS. You may have questions about Pafford EMS, such as your day-to-day duties, benefits, and what you can expect from us and what we can expect from you. This Handbook has been prepared as a guide to answer many of your questions. Each of the policies in this Handbook is important in providing the structure, rules, and guidance related to your involvement with Pafford EMS. Please read it carefully and keep it handy to use as a reference tool.

If you cannot find an answer in the Handbook, then your supervisor will be your major source of information. Supervisors expect questions and will do their best to give you a prompt response. Many of the policies included in this Handbook reference other policies within our organization. You are encouraged to review and be familiar with all Company policies during your service here.

Pafford EMS may, from time-to-time, make deletions, changes or additions to this Personnel Handbook. When this occurs, you will receive updates as soon as possible. Nothing contained in this Handbook is to be considered an employment contract, and any employment relationship is deemed to be at the will of either the organization or you as an employee.

In addition to your supervisor, you can direct any questions you may have regarding our policies to the Director of Human Resources.

The following phrases, used throughout this Handbook, have the following meanings:

ELT means the Senior Leadership Team.

ELT Member means any member of the Senior Leadership Team.

Officer means any elected or appointed officer of the Pafford EMS.

Personnel or Staff Member means a person who is an employee of any rank for Pafford EMS.

Expectations

The successful operation of Pafford EMS depends on the professionalism, courtesy, and competency of all personnel. It is our intent to rely on the best personnel to fulfill our mission of public service. In return for your contribution to the success of Pafford EMS, we will make a concerted effort to provide you with a meaningful and rewarding experience here. You can further expect respect for your individual rights, honest and fair treatment by management, high quality equipment, a safe and pleasant work environment, and conditions that are consistent with state-of-the-art EMS organizations.

At all times, we expect high quality performance along with cooperation and respect for the patient, the public, fellow staff members, and management. Professional appearance and behavior are crucial to our success, and all personnel are expected to be courteous, loyal, honest, and to respect and comply with Pafford EMS rules, regulations, and policies. The strength of Pafford EMS is its personnel, and we invite you to provide input and suggestions for continued enhancement of our activities.

We are a “people” business. That means we all must do our very best to effectively communicate with others, especially the patients who rely so much on our service. Most of the calls we respond to do not involve “life or death” situations. The most frequent attributes you will need to rely upon are your interpersonal communication skills and your compassion for others. Many of our patients will be elderly and may need the emotional and psychological support that comes from a caring attitude in all that you do. We expect that all patients will be treated with utmost dignity. Please remember our overriding philosophy – treat others in the same way that you would want to be treated or that you would want your own family to be treated. If you follow this simple philosophy in every encounter with a patient, family member, the public, or fellow staff members, you will feel good about yourself and the service you provide, and you will enhance our position and reputation in the community.

The Role of Your Supervisor

Your supervisor is a very vital part of our management team. Your supervisor will be your main “go to” person when you have questions or concerns. Your supervisor is directly responsible for overseeing daily operations, planning the work schedule, monitoring the quality of your work, and providing you with whatever assistance you may need. Your supervisor will introduce you to your fellow personnel, show you where things are, and advise you on where you can improve your performance.

An important part of your supervisor’s responsibilities is to answer questions, listen to your concerns, help you explore alternatives for resolving those problems, and act where appropriate. Your supervisor is there not only to supervise, but also to make your concerns known to upper management. Feel free to discuss any issues with him or her and give your supervisor your cooperation.

Our entire management team prides itself on an “open door policy,” and you are encouraged to approach any member of management with thoughts, problems, or other ideas for improving our organization.

Communications

Open communication is essential to the overall success of the organization. We encourage open, continuous, and positive communication between management and staff. Periodic management staff meetings as well as general staff meetings may be held to help maintain our strong lines of communication throughout the organization.

Experience has shown that concerns can very often be resolved by getting them out in the open as quickly as possible. You should communicate any problem situations or concerns you have directly to your immediate supervisor. We encourage the management team to be effective problem solvers. They should be able to answer most of your questions or resolve any issues or concerns that you raise in a prompt fashion, in most cases. If you are not satisfied with the resolution of your concern, or, if for some reason, you do not wish to discuss it with your supervisor directly, you may discuss the matter with any member of the management team. If the problem is of a personal nature, feel free to voluntarily schedule an appointment with a senior manager. We will make every effort to keep these discussions confidential, to the greatest degree feasible based under the circumstances, if they involve sensitive issues.

Pafford EMS has a strong focus on compliance. We must comply with all applicable laws and regulations that govern the highly-regulated EMS and medical transportation field. We strive to meet the expectations of the regulatory bodies and our patients and customers. If you ever feel that we are not being fully compliant with the law or regulations, we encourage you to express your concerns to a member of the management team.

Statement of Employment at Will

Employment or membership with Pafford EMS is “at will,” meaning that both you and the organization remain free to terminate the relationship at any time, for any reason, with or without advance notice. Nothing in this Handbook shall be construed to alter the at-will nature of employment or membership status within the organization, and nothing in this handbook shall be construed to create a contractual relationship between Pafford EMS and any employee or member where such a relationship does not otherwise exist.

More specifically, none of the following alters the at-will nature of employment or membership status within the organization:

1. Oral or written statements or representations, whether before or after your hiring, except an express written contract that is signed by you and an authorized representative of Pafford EMS.
2. Practices or procedures of Pafford EMS or its supervisory personnel.
3. Any written materials including recruitment materials, employment applications, policies, rules, guidelines, descriptions of benefits, and this Handbook.
4. Completion of an “Introductory Period,” “Orientation Program” or conferral of “regular” employee status for which benefits begin to accrue.

Personnel File & Updating Personal Information

It is important that Pafford EMS maintain complete and accurate personnel records for all employees. It is equally important to have certain information about all personnel on file. In order to keep these records up-to-date for operational, emergency and insurance purposes, it is essential that you notify Pafford EMS as soon as possible if there is any change to any of the following items:

- Legal name.
- Home address.
- Home telephone number.
- Personal cellular telephone number.
- Person to contact in an emergency.
- Number of dependents, if participating in Company-sponsored benefits requiring this data.
- Marital status, if participating in Company-sponsored benefits requiring this data.
- Change of beneficiary.
- Driving record or status of driver's license (if you operate any Company vehicle).
- Military status.
- Exemptions on your W-4 tax form (*employees only*).
- Certifications, recognitions, expiration dates, identification numbers, etc.
- I-9 immigration forms (*employees only*).
- EMT/Paramedic/Health Professional Certification Renewal
- Continuing Education classes/credits

Pafford EMS maintains a personnel file on each employee. The personnel file includes such information as the employee's job application, resume, records of training, documentation of performance appraisals and salary increases, disciplinary actions and other personnel records.

Personnel files are the property of Pafford EMS, and access to the information they contain is restricted. Generally, only management personnel of Pafford EMS who have legitimate reason to review information in a file are allowed to do so.

Personnel who wish to review their own file should contact the Director of Human Resources. With reasonable advanced notice, employees may review their own personnel files in Pafford EMS's offices and in the presence of an individual appointed by Pafford EMS to maintain the files.

Medical Examination

We are a safety-sensitive operation and lives depend on our ability to physically and mentally deal with a wide range of situations. All applicants for employment are required to undergo a medical examination and alcohol and drug screening prior to the rendering of any services on behalf of Pafford EMS. The cost of the exam and the testing will be covered by Pafford EMS. Continued employment with Pafford EMS is dependent upon the satisfactory completion of this medical examination and a determination that you are capable of performing the essential functions of the position, with or without reasonable accommodation for any disabilities that may affect your ability to function in a safe and effective manner. All physical examination requirements will be completed in compliance with applicable workers' compensation, disability discrimination, and all other applicable laws.

Non-Discrimination Commitment/Equal Employment Opportunity

Pafford EMS follows a strict Policy that we do not discriminate in providing services and care to the patients we serve, or in the terms and conditions of employment for our staff. We will not discriminate on the basis of race, sexual orientation, color, national origin, ancestry, religion, sex, age, disability, political belief, military service, or any other protected class. It is at all times the intent of Pafford EMS to comply with all federal, state and local discrimination and employment laws.

Each staff member must report to his or her supervisor, another member of management, or the Human Resources Department, any incident in which he or she feels that there has been discrimination on the basis of race, color, national origin, ancestry, religion, sex, age, disability, political belief, military service, or any other protected class.

Additionally, all hiring, promotion, discipline, termination, and workplace accommodation decisions shall occur on a non-discriminatory basis, with reasonable accommodations being made where possible, to the extent that essential job functions can be properly performed.

This Policy is neither exhaustive nor exclusive. Pafford EMS 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.

Immigration Law Compliance

Pafford EMS is committed to employing only United States citizens and aliens who are authorized to work in the United States. We will not unlawfully discriminate on the basis of citizenship or national origin.

In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility. Former employees who are rehired must also complete the form if they have not completed an I-9 form within the past three years, or if their previous I-9 form is no longer retained or valid.

Employees with questions or seeking more information on immigration law issues are encouraged to contact their supervisor or the Human Resources Department. Employees may raise questions or complaints about immigration law compliance without fear of reprisal.

Personnel Medical Records

All medical records we receive about staff members are retained in a confidential manner to the fullest extent possible. Generally, only those persons within Pafford EMS with a need to know the information will have access to such records. And, even then, such persons will only have access to as much information as is minimally necessary for the legitimate Company-related use of the medical records. All staff member medical information will be kept in a locked office or a locked file cabinet or electronically, and will be maintained separate from personnel files. Medical information in electronic form will only be accessed by management personnel authorized and permitted under the law to access that information.

In accordance with laws concerning disability discrimination, all medical records of personnel will be kept in separate files, apart from the general personnel file. These records will be secured and be treated as confidential, except that, in accordance with the law, management must have limited access to learn about information regarding necessary restrictions on the work or duties of the employee and reasonable accommodations that may have to be made.

In accordance with the Privacy Rule of the Health Insurance Portability and Accountabilities Act (HIPAA), employment records are not considered to be protected health information (PHI), subject to HIPAA safeguards. This includes certain medical records that may be retained by Pafford EMS as your employer. While HIPAA's Privacy Rule is not applicable to employment records, general state and federal privacy laws remain applicable. In the interest of privacy and confidentiality, Pafford EMS will treat your medical records with utmost respect, privacy, and security to the greatest extent possible.

Notwithstanding the above, employment records, including employee medical records, may be produced in response to a valid subpoena or other legal process or in response to a government agency request for such records when the request is made in connection with the agency's lawful exercise of its investigative authority.

Mission, Vision, Values, and Promise

Mission:

To provide high-quality, compassionate care to the communities we serve.

Vision:

To own the culture of safe and clinically competent care.

Values:

Safety
Compliance
Quality
Innovation
Service

The Pafford Promise:

We promise to treat patients, their families, and our healthcare partners with courtesy, professionalism, dignity and respect.

We promise to provide safe transport solutions with collaborative teamwork and good communication.

We promise to strive for clinical and operational excellence through process improvement, continuing education, continuous quality improvement, and innovation.

We promise to lead the way by employing only the highest caliber pre-hospital clinicians who have advanced credentialing and the ability to deliver high quality care to the sickest of patients while incorporating evidence-based medicine.

We promise to listen to the feedback from our healthcare partners to make adjustments and improvements in order to provide the highest level of care to the patients we serve.

We promise to work expeditiously yet competently to assist our healthcare partners in transporting patients to appropriate care.

Business Ethics and Conduct

The successful business operation and reputation of Pafford EMS is built upon the principles of fair dealing and ethical conduct of our employees and members. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of Pafford EMS is dependent upon our customers' and patients' trust and we are dedicated to preserving that trust. Employees owe a duty to Pafford EMS, its customers, its patients, and each other to act in a way that preserves the public's trust and confidence.

Pafford EMS will comply with all applicable laws and regulations and expects its directors, officers, members and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest or unethical conduct.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your supervisor or an officer for advice and consultation.

Compliance with this Policy of business ethics and conduct is the responsibility of every Pafford EMS employee, manager, director, and senior leader. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including possible termination of employment.

Compliance

Pafford EMS is committed to adhering to all local, state and federal laws that relate to the operation of our organization. Pafford EMS takes its legal compliance obligations seriously and expects all personnel to review and comply with the policies contained in this Handbook and any other regulatory or operational policies implemented. Pafford EMS may be required to report certain violations of law to appropriate oversight authorities. Be aware that inappropriate actions, not in compliance with the law, may subject you to discipline or corrective counseling up to and including termination from employment or membership.

Section 2: General Policies – All Personnel

Code of Conduct and General Rules of Behavior

We count on professionalism and common sense in the actions of all of our staff. An attitude of mutual respect is expected among all persons at the workplace or while engaged in their performance of work-related responsibilities. All staff members are expected to conduct themselves in a professional manner in all aspects of carrying out one's job responsibilities. Conduct that is dangerous to others, dishonest, immoral, illegal or abusive will not be tolerated. Violation of these standards of conduct will be grounds for disciplinary action, up to and including suspension and termination from employment.

Policy:

All Policies within this Handbook that relate to personnel conduct shall be followed, including standards contained within this Policy.

- Personnel should exercise care to ensure that intellectual property rights, including patents, trademarks, copyrights, and software are carefully maintained and managed to preserve and protect its value.
- Personnel will exercise due care to prevent the release or sharing of financial, proprietary, or patient information beyond those persons who may need such information to fulfill their job/position. Pafford EMS expects all personnel to conduct themselves at all times in a manner that is compliant with all laws related to reimbursement, confidentiality and other areas. Generally, any conduct that is immoral, unethical or illegal will not be tolerated. The following are examples of some, but not all, misconduct which may subject you to disciplinary action. It is impossible to list every reason why an employee or member may be subject to disciplinary action. The following list merely provides guidance to our members and employees concerning conduct Pafford EMS would define as unacceptable, intolerable, and warranting disciplinary action, up to and including termination from employment:
 1. Falsification of records (including personnel/Company records and employment application or other records).
 2. Solicitation or distribution in violation of the no solicitation and distribution rules.
 3. Unauthorized or careless use or, malicious destruction or damage of company property, tools or vehicles.
 4. Unauthorized release of confidential patient or proprietary information.
 5. Unlawful or unauthorized manufacture, distribution, dispensation, possession or use of any controlled substance or alcohol.
 6. Reporting to work under the influence of alcohol, illegal drugs or a legal drug which adversely affects safety or job performance.
 7. Any violation of the Drug and Alcohol Free Workplace Policy.
 8. Accepting gifts from suppliers, patients, facilities, or customers without prior permission.

9. Bringing firearms or weapons on Company premises or property, except to the extent permitted by the Firearms, Weapons, and Explosives Policy
10. Poor or unsatisfactory work performance or conduct.
11. Disorderly conduct or boisterous or disruptive activity, such as but not limited to horseplay in the workplace.
12. Fighting or threatening violence in the workplace.
13. Removing records, materials or other Pafford EMS property (other than Company-issued uniforms, pagers, cell phones, or other Company-issued electronic devices through which Company/staff member communications are expected to occur) from Pafford EMS premises or property without permission.
14. Any other type of theft or inappropriate removal or possession of property.
15. Gambling on company property or during working hours.
16. Violation of established safety rules (including smoking rules).
17. Abusive or threatening language.
18. Unexcused or excessive absenteeism or tardiness.
19. Harassment or discrimination in violation of law or Company policy.
20. Failure to report a workplace accident, injury, or damage to Pafford EMS property.
21. Refusal to accept a job assignment.
22. Creating unsafe or unsanitary conditions.
23. Extending breaks or lunch beyond time limits.
24. Reading material other than work-related periodicals and manuals while you should be performing job- related duties.
25. Obscene discussions with patients/staff of health facilities or with co-workers in front of patients/staff of health facilities.
26. Use of Company property or equipment for personal use without permission.
27. Criminal conduct of any kind, including use of Pafford EMS internet, equipment or property to access pornographic material or the distribution of same within the workplace.
28. Any other unauthorized use of Pafford EMS-owned equipment.
29. Unauthorized disclosure of confidential Company information or material.
30. Violation of any personnel policies.
31. Conduct that is dangerous to others, dishonest, immoral, illegal or abusive will not be tolerated.

Violation of these standards of conduct will be grounds for disciplinary action, up to and including termination from employment.

Pafford EMS reserves the right to dismiss any employee without warning, progressive discipline, or notice, if we determine that continued employment is not in the best interests of Pafford EMS, other employees, other members or the community we serve. At all times, employment is “At Will” unless the at-will status is changed in writing by a member of management authorized to make such change.

Progressive Discipline

Purpose:

To ensure that personnel adhere to all essential policies and standards of performance and behavior established by Pafford EMS, including the Code of Conduct, and to initiate corrective action when those standards are not met.

Policy:

Pafford EMS will follow a progressive discipline approach whenever reasonable and appropriate based upon the severity of the offense, and other important factors to help ensure compliance with established policies and standards. Pafford EMS reserves the right to suspend an employee (with or without pay) as it deems appropriate, as part of its investigation of that person's conduct. Pafford EMS further reserves the right to take any action which differs from any progressive disciplinary steps, including suspension and termination from employment as a first step.

Procedure:

I. Background.

A. Progressive Disciplinary Model.

1. Pafford EMS follows a progressive discipline model. It is a structured, but flexible disciplinary plan, whereby discipline will be handled in phases, and the severity of the discipline will generally increase based upon the severity or frequency of the violation.
2. Pafford EMS will use this model where appropriate and necessary, but certain violations may warrant immediate and more serious action, based upon the nature or degree of the violation and other factors. In other words, in some cases, Pafford EMS may not follow the progressive disciplinary model, especially if the infraction is of a serious nature.
3. Progressive discipline may be accomplished through four levels of sanctions for disciplinary violations - verbal warning, written warning, suspension, and termination. Pafford EMS will attempt to follow this progression whenever warranted. Progressive discipline will not always begin with a verbal warning. Rather, in implementing the appropriate discipline for the offense, Pafford EMS may skip a step, start in the middle of the progressive discipline steps, or move to more serious discipline (up to and including termination for a first offense) in Pafford EMS's sole discretion, depending on the particular circumstances and seriousness of the violation.

4. An overlying theme to administration of discipline is to ensure thorough review of each situation and to make an objective determination. Personnel subject to discipline will have an opportunity to be heard and to present their “side of the story” whenever possible.

II. Standards.

- A. Depending upon the nature and severity of the offense, interviews and statements of persons involved in the incident may be required.
- B. A supervisor or other member of management will initiate corrective counseling and impose appropriate discipline if necessary after review or investigation of the incident has occurred.
- C. All personnel involved in any incident investigation are expected to fully cooperate with any such investigation.
- D. Corrective counseling will be used whenever appropriate to correct work performance and improper conduct, or in situations where policies have been violated.

III. Levels of Violations.

- A. Pafford EMS’s Progressive Discipline Model is generally structured as follows:
 1. *Verbal warning.* Written documentation of the nature and date of the offense and that a verbal warning was given for the offense shall be placed in the staff member’s personnel file.
 2. *Written warning.* Written documentation of the nature and date of the offense and that a written warning was given for the offense shall be placed in the staff member’s personnel file.
 3. *Suspension without pay.* Written documentation of the nature and date of the offense and the starting/ending dates of the suspension shall be placed in the staff member’s personnel file.
 4. *Termination from employment.*
- B. Minor violations will typically begin with a verbal warning, while more serious violations can result in suspension or in rare cases, termination. At all times, Pafford EMS reserves the right to impose any level of discipline upon any employee for any type of violation as is necessary to maintain operational integrity.

IV. Documentation.

All warnings, investigations, and other documentation related to an incident investigation shall be retained in the employee’s personnel file.

V. Non-Work Activities.

- A. Generally, Pafford EMS will not initiate corrective counseling or impose discipline for actions and events that occur on non-work time and off of company premises. However, to the extent that unacceptable off duty conduct results in a violation of any Pafford EMS policy or affects or has the potential to adversely affect Pafford EMS, the employee's ability to perform job duties, or the conduct adversely affects others, then appropriate corrective action may be imposed.
- B. A supervisor or appropriate member of management shall have the discretion to impose appropriate discipline in situations where off duty activities violate any Pafford EMS policy, adversely affect Pafford EMS, its reputation, its obligations, or the employee's ability to perform his or her job.

Drug and Alcohol-Free Workplace

Purpose:

To follow state and federal laws consistent with our commitment to the well-being of our personnel and patients we serve by maintaining a safe and drug and alcohol-free work environment.

Policy:

Pafford EMS will not tolerate personnel under the influence of alcohol or illegal drugs or those who use alcohol or illegal drugs (or misuse legal drugs) while on duty, while operating Company vehicles, or while representing Pafford EMS.

Procedure:

Pafford EMS is committed to protecting the safety, health and well-being of all employees and other individuals in our workplace. We recognize that alcohol abuse and drug use pose a significant threat to our goals. Being under the influence of drugs, alcohol or other intoxicating substances while performing work-related duties poses a serious safety and health risks to the user and to all those who function with the user. We have established a drug and alcohol-free workplace program that balances our respect for individuals with the need to maintain an alcohol and drug-free environment.

Pafford EMS has the right and obligation to maintain a safe, healthy, and efficient workplace for all of its personnel and to protect the organization's property, information, equipment, operations and reputation. Pafford EMS also recognizes its obligations to the communities it serves for the provision of services by personnel who are free of the influence of unlawful or unauthorized drugs, alcohol, and other intoxicating substances. This organization encourages personnel to voluntarily seek help with drug and alcohol problems.

Covered Personnel:

Any individual who conducts business for Pafford EMS or any company affiliated with Pafford EMS (on either a paid or volunteer basis), is applying for a position, is an employee or a prospective employee of Pafford EMS or any company affiliated with Pafford EMS, is otherwise affiliated with the organization or is conducting business on the organization's property is covered by our Drug and Alcohol-Free Workplace Policy. Our Policy includes, but is not limited to, employees, ELT Members, officers, directors, contractors, and applicants, . So, while you may simply see the term "personnel" used in many places throughout this Policy, this Policy applies uniformly to all covered personnel listed in this Section.

Applicability:

Our Drug and Alcohol-Free Workplace Policy is intended to apply whenever anyone is representing or conducting business for Pafford EMS. Therefore, this Policy applies during all working hours, whenever conducting business or representing the organization, while on call, standby, while on Pafford EMS property and at Pafford EMS-sponsored events. This Policy

applies to all personnel, prospective employees, and all others who are performing or desire to perform services for Pafford EMS or any company affiliated with Pafford EMS in either a paid or volunteer capacity. The term employee includes part-time, full-time and per diem employees, as well as those who have applied or intend to apply for employment.

Prohibited Behavior:

It is a violation of our Drug and Alcohol-Free Workplace Policy to use, sell, possess, purchase, transfer, trade, and/or offer for sale alcohol, illegal drugs or intoxicants. No substance which may or has the likely effect of adversely affecting an employee's, or other personnel's job performance may be taken within eight (8) hours of the start of a shift or any duties for or on behalf of the organization.

Prescription and over-the-counter drugs are not prohibited when taken in standard dosage and/or according to a physician's prescription. Any employee taking prescribed over-the-counter medications will be responsible for consulting the prescribing physician and/or pharmacist to ascertain whether the medication may interfere with the safe performance of his or her duties at Pafford EMS. If the use of a medication could compromise the safety of the employee, fellow employees, the public or our patients, it is the employee's responsibility to use appropriate personnel procedures (e.g., call in sick, use available leave, request a change of duty, notify a supervisor, etc.) to avoid unsafe workplace practices.

The illegal, unauthorized, excessive or improper use of prescription drugs, over-the-counter drugs, or other potentially intoxicating substances is prohibited. It is a violation of our Drug and Alcohol-Free Workplace Policy to intentionally or unintentionally misuse and/or abuse prescription medications, nonprescription medications, or other intoxicating substances. Appropriate disciplinary action will be taken for violations of our Drug and Alcohol-Free Workplace Policy up to and including termination from employment.

Notification of Convictions:

Any employee who is convicted (including pleas of no contest) of a criminal drug or alcohol-related violation must notify the Human Resource Department or its designee in writing within five (5) calendar days of the resulting conviction (including any pleas of no contest) or other outcome. If your driver's license is suspended, you are required to notify the President or the President's designee prior to any suspension. The organization will use its best efforts to take appropriate action within thirty (30) days of notification.

Searches:

Entering Pafford EMS's property constitutes consent to searches and inspections. If an individual is suspected of violating this Drug and Alcohol-Free Workplace Policy, he or she may be asked to submit to a search or inspection at any time. Searches can be conducted of pockets and clothing, lockers, wallets, purses, briefcases and lunchboxes, and other bags, desks and work stations, Company vehicles and Company equipment.

Pafford EMS may conduct unannounced general inspections and searches for drugs or alcohol on Pafford EMS premises or in vehicles or equipment owned or leased by Pafford EMS wherever located. Employees must cooperate in these inspections and searches as a condition of employment or affiliation.

Illegal drugs, drugs believed to be illegal, and drug paraphernalia found on Pafford EMS property will be turned over to the appropriate law enforcement agency. Company personnel, as a condition of employment, must give full cooperation in any subsequent investigation. Substances that cannot be identified as an illegal drug by a layman's examination may be turned over to a laboratory for scientific analysis or to law enforcement.

If any personnel are subject to a drug or alcohol-related investigation by the organization or by a law enforcement agency, the staff member may be suspended without pay, pending completion of the investigation.

Drug and Alcohol Testing:

By accepting and continuing employment with Pafford EMS, such employee consents to the submission of drug and/or alcohol testing, and the employee's refusal to consent may result in disciplinary action, including discharge.

To ensure the accuracy and fairness of our testing program, all testing will be conducted according to Substance Abuse and Mental Health Services Administration (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 personnel 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/alcohol testing information will be maintained in separate confidential records.

Each employee, as a condition of employment, may be required to participate in pre-employment, pre-duty, periodic, random, post-accident, reasonable suspicion, return-to-duty, and follow-up testing upon selection or request of the Human Resources Department or its designee.

The substances that will be test for are amphetamines, cannabinoids (THC), cocaine, opiates, phencyclidine (PCP), alcohol, barbiturates, benzodiazepines, methaqualone, methadone, propoxyphene, and other substances permissible to be tested for according to federal and state law.

Testing for alcohol will be conducted by analysis of breath, saliva, and/or blood. Testing for the presence of the metabolites of drugs will be conducted by the analysis of blood, urine, hair, saliva and/or sweat.

Personnel whose test results demonstrate violation of the Drug and Alcohol Free Workplace Policy will be immediately relieved from duty, will be suspended from future duties without pay, and will likely be terminated from employment (unless the organization, in its sole discretion, decides to offer a Return-to-Work or Last Chance Agreement).

Personnel will be subject to the same consequences of a positive test if they refuse the screening or the test, adulterate or dilute the specimen, substitute the specimen with that from another person or sends an imposter, will not sign the required forms, or refuse to cooperate in the testing process in such a way that prevents completion of the test.

Consequences:

One of the goals of our drug and alcohol-free workplace program is to encourage personnel to voluntarily seek help with alcohol and/or drug problems before a test becomes necessary. If, however, an individual violates the Policy, the consequences are serious.

In the case of applicants for employment, if he or she tests positive for an unlawful substance or unauthorized use of prescription medication, or otherwise violates the Drug and Alcohol-Free Workplace Policy, the offer of employment/services will be withdrawn. The applicant may not reapply.

Return-to-Work/Last Chance Agreements:

Following a confirmed violation of the Drug and Alcohol-Free Workplace Policy, an employee may, in the sole discretion of Pafford EMS, be offered an opportunity to participate in rehabilitation. In such cases, the employee must sign and abide by the terms set forth in a Return-to-Work Agreement or Last Chance Agreement as a condition of continued employment.

Even if an employee is offered a Return-to-Work or Last Chance Agreement, Pafford EMS retains full rights to prohibit the active participation of that individual in any organizational activities, particularly those that deal with the public or public safety (such as, but not limited to duties as paramedic or EMT and/or driving Company vehicles).

Assistance:

Pafford EMS recognizes that alcohol and drug abuse and addiction are treatable illnesses. We also recognize that early intervention and support may improve the success of rehabilitation. To support our personnel, our Drug and Alcohol-Free Workplace Policy encourages personnel to seek help if they are concerned that they may have a drug and/or alcohol problem.

Treatment for alcoholism and/or other drug use disorders may be covered by the employee's health insurance. However, the ultimate financial responsibility for recommended treatment belongs to the individual employee.

Confidentiality:

To the fullest extent appropriate to the circumstances, all information received by Pafford EMS through the Drug and Alcohol-Free Workplace Program will be treated as confidential. Access to this information is limited to those who have a legitimate need to know and generally only the information necessary to ensure the safety of the individual and others will be shared.

Shared Responsibility:

A safe and productive drug and alcohol-free workplace is achieved through cooperation and shared responsibility. Employees, officers, directors, and management all have important roles to play.

All personnel are required not to report to work or be subject to duty while their ability to perform job duties is impaired due to on or off-duty use of drugs, alcohol or other intoxicating substances. Consequently, all personnel performing services for Pafford EMS should not take any substance which may impair their ability to perform their duties within eight (8) hours of the start of any shift.

In addition, personnel are encouraged to:

- Be concerned about working in a safe environment.
- Support fellow personnel in seeking help.
- Report dangerous behavior to the Human Resources Department immediately.

It is the Human Resources Department's responsibility to:

- Inform personnel of the Drug and Alcohol-Free Workplace Policy.
- Observe personnel performance.
- Investigate reports of dangerous practices.
- Document negative changes and problems in performance.
- Counsel personnel as to expected performance improvement.
- Clearly state the consequences of a Policy violation.

Communication:

Communicating our Drug and Alcohol-Free Workplace Policy to all employees, supervisors, members of management, officers and directors is critical to our success. To ensure that everyone is aware of their role in supporting our Drug and Alcohol-Free Workplace Program:

- All personnel will receive a copy of the Policy.
- All personnel must review this Drug and Alcohol-Free Workplace Policy and return the Acknowledgement form provided in Pafford EMS's onboarding documents, acknowledging receipt and understanding of this Policy to the Human Resources Department.

Use of Alcohol While on Duty or On-Call

Purpose: As providers of emergency services, Pafford EMS is committed to safely serving the community without harm to our personnel or others. We must be ready to respond at a moment's notice to a variety of situations and to confront numerous hazards. To operate effectively and safely, we must insure that personnel are fully prepared to perform their duties without the influence of alcohol.

Policy: No personnel shall be under the influence of alcohol while on duty, when responding to a call, while on call, or when otherwise engaged in Company activities.

Procedure:

I. Standards.

- A. Personnel shall not respond to any call if they have ingested any alcoholic beverage 8 hours prior to their work shift, or if they are on call, 8 hours prior to being called out.
- B. Personnel who appear to be under the influence of alcohol at a scene (based on the reasonable judgment of the officer in charge) will be immediately dismissed from the scene, may be required to undergo alcohol testing, and may face disciplinary action up to and including termination.
- C. Any personnel who drive either a Pafford EMS vehicle or a personal vehicle to the scene while under the influence of alcohol may face criminal prosecution for driving under the influence and may be reported to the appropriate authorities, including EMS licensing agencies and local law enforcement agencies.
- D. On-call staff members who have consumed alcoholic beverages and fail to respond to a call will be subject to appropriate discipline.

II. Violations.

- A. If a manager or supervisor reasonably believes a staff member is under the influence of alcohol, the supervisor may remove the staff member for alcohol testing and, in appropriate circumstances and where the individual is confirmed to be under the influence, he or she may be reported to the proper authorities.
- B. Any staff member who refuses to be tested is subject to immediate suspension and may face termination.

Policy Against Harassment and Discrimination

Purpose:

To maintain a work environment that is free of discrimination and harassment in accordance with applicable law.

Policy:

Pafford EMS will have “zero tolerance” when it comes to any behavior that could be reasonably viewed as discriminatory or harassing in nature. Put simply, harassment or discrimination of any sort based on any protected characteristic will not be tolerated at Pafford EMS. Further, in appropriate circumstances, Pafford EMS will afford reasonable accommodations to employees based upon a disability or religious conflict.

Procedure:

I. Conduct Prohibited.

A. General Prohibition on Discrimination and Harassment.

1. All personnel shall respect the rights, opinions, and beliefs of others. Harassment of, or discrimination against, any person by anyone (regardless of their position) because of a person's race, color, national origin, ancestry, religion, sex, sexual orientation, age, disability, political belief, military service, or any other protected class, is strictly prohibited, whether directed at an employee or at a member of the community.
2. Harassing or discriminatory conduct outlined in this Policy is prohibited even if that conduct does not violate federal and/or state law.

B. Sexual Harassment.

1. Sexual harassment may include any unwelcome sexual advance, requests for sexual favors, and other verbal or physical conduct of a sexual nature. These requests, advances, or sexual conduct constitute prohibited sexual harassment when:
 - a. Tolerating the conduct is a condition of employment or condition of participation in Pafford EMS activities. For example:
 - The submission to the improper conduct is made a term or condition of employment or participation in Company activities. (Example: Staff member is told by a supervisor that she should date him in order to get a good performance review.)

- b. The conduct has adverse consequences on the individual. For example:
 - The submission to or rejection of the harassing conduct is used as a basis for employment or membership decisions affecting the individual. (Example: Staff member refuses sexual advances or legitimately complains of improper conduct and is assigned a more onerous work schedule that is intolerable.)
- c. The improper conduct interferes with the work performance of other staff members or interferes with their ability to function in their position. For example:
 - The conduct has the purpose or effect of unreasonably interfering with performance by creating an intimidating, hostile, or offensive environment. (Example: Female member feels sick when she comes to the station because whenever she is there, a male staff member (or members) frequently makes comments about her body parts or physical attributes.)

2. Sexual harassment is prohibited. That is:

- a. No one may threaten or imply that submission to or rejection of sexual advances will in any way influence any decision about employment, duties, assignment, or other terms or conditions of employment.
- b. No one may take any personnel action based on a staff member's submission to or rejection of sexual advances.
- c. No one may subject another person to any unwelcome conduct of a sexual nature. Some examples of unwelcome conduct of a sexual nature include:
 - Unwelcome physical conduct, such as touching, restraining, blocking, staring, making sexual gestures, exposing private body areas to others, and making or displaying sexual drawings, photographs, videotapes, DVDs or other pornographic materials.
 - Pestering for a date or personal information or failing to take “no” for an answer when the staff member refuses such requests.

- Unwelcome verbal conduct, such as sexual propositions, sexual slurs and insults, comments about private body areas (such as breasts and genitals), jokes with sexually-oriented content and other sexual comments.
- Intentional receipt or transmission of pornographic or sexually explicit jokes, photographs, cartoons, or other material in any manner and via any method. This includes via computer or mobile electronic devices, or from or through the Internet, electronic mail, text messaging, through any website or smart phone applications, on paper, or communicated verbally.
- No one may engage in consensual or non-consensual conduct of a sexual nature in Company vehicles or on any Company property.
- No one may in engage in consensual or non-consensual touching that could be perceived as being harassing, such as but not limited to neck rubs, back rubs and massages.

C. Other Harassment.

1. No one may harass anyone because of that person's race, color, national origin, ancestry, religion, sex, sexual orientation, age, disability, political belief, military service, or any other protected characteristics. Examples of conduct prohibited by this Policy include using racial and ethnic slurs or offensive stereotypes and making jokes about these characteristics.
2. Physical harassment is prohibited, including but not limited to:
 - a. Kissing, patting, touching, bumping, or other unwanted contact.
 - b. Solicited or unsolicited shoulder/body massages.
 - c. Touching or adjusting the clothing of another without permission.
 - d. Intentionally blocking a passageway or cornering a person so they cannot move, even if it is just for a brief moment.
 - e. Involuntary seclusion, such as barring the staff member from contact with other crew members while at the station.
 - f. Physical Assault/Sexual Battery.
3. Verbal harassment is also prohibited, including, but not limited to:

- a. Obscene noises (grunting, panting, whistling, barking, etc.).
- b. Offensive or demeaning comments or jokes related to race, national origin, religion, sex, sexual orientation, age, disability, or any other protected characteristic.
- c. Offensive reference to or naming of body parts with nicknames.
- d. Sexual rumors, innuendos, or inquiring about a person's sexual activity.
- e. Any visual harassment that may accompany (or stand-alone) from verbal harassment, including staring at body parts, use of crude notes or gestures, or sexually implicit pictures.

D. Consensual sexual conduct.

- 1. Consensual sexual conduct, while not necessarily constituting the harassment of either of the consenting parties, may cause a hostile work environment for others, and will not be tolerated in the workplace. This includes, but is not limited to:
 - a. Consensual conduct of a sexual nature in Pafford EMS vehicles or on any Pafford EMS property.
 - b. Engaging in non-sexual touching that could be perceived or otherwise lead to more intimate sexual conduct, including giving backrubs and other treatment that involves touching.

II. Workplace Accommodations.

State and federal laws prohibiting discrimination on the basis of a disability or on the basis of religion also require providing reasonable accommodations to employees or applicants when such would not impose an undue hardship on the Company within the meaning of the law.

Except where undue hardship exists, Pafford EMS will provide reasonable accommodations for personnel or applicants where requested and where a Company requirement, condition, or policy conflicts with the individual's sincerely held religious beliefs. Personnel or applicants requesting such accommodation will be required to provide an attestation explaining why they are seeking a religious accommodation. They may also be required to obtain a certification from their religious leader or other individual who can attest that the employee's religious beliefs are sincerely held. A request for religious accommodation should be submitted to the Human Resources Department immediately.

Accommodations based upon an individual's disability will be considered in accordance with the Illness, Pregnancy, and Disability Accommodation Policy.

III. Making Complaints and Reporting Violations.

- A. Personnel may make a complaint to any manager or supervisor to whom they feel comfortable making the complaint or to the Human Resources Department. All personnel must report any incident or conduct that is perceived as being in violation of this Policy, even if they are not the victim of the alleged harassment or discrimination. Reporting may be verbal or written. A written report is not required to report alleged violations of this Policy, though a written narrative is encouraged and often helpful to determine the appropriate next steps.
- B. Personnel are not required to first complain to the person who engaged in that conduct, although telling the person engaged in the inappropriate conduct that their behavior is not welcome or asking them to stop the behavior is a good idea.
- C. Personnel who observe harassment of another staff member are required to report this observation. No reprisal, retaliation, or other adverse action will be taken against any member or employee for making, in good faith, a complaint or report of harassment, or for assisting in good faith in the investigation of any such complaint or report. Any suspected retaliation or intimidation should be reported immediately to any supervisor or manager or the Human Resources Department.
- D. Pafford EMS will promptly, thoroughly, and impartially investigate any complaint or report of a violation of this Policy and will take prompt and proportionate action when it is determined that a violation has occurred. Additionally:
 - 1. Pafford EMS will protect the confidentiality of information involving individuals involved in harassment allegations to the greatest extent possible consistent with a thorough and impartial investigation. Such information may be shared with those who have a need to know, such as key management personnel and other essential persons involved in the investigation.
 - 2. Investigations may include interviews of persons believed to be involved, or with potential knowledge of the event, and shall include a full report on each investigation, retaining the confidentiality of all such persons involved where possible.

IV. Penalties for Violations.

- A. Pafford EMS will take prompt remedial and possibly disciplinary action if the investigation shows a violation of this Policy. Disciplinary action for personnel may include verbal or written warning, suspension, or termination from employment.
- B. A complaint or report that this Policy has been violated is a serious matter. Dishonest complaints or reports not made in good faith are also against this Policy,

and appropriate disciplinary action will be taken if the investigation shows that deliberately dishonest and bad faith accusations have been made against another staff member.

V. No Reprisals or Retaliation.

- A. Retaliation against any staff member for reporting an alleged violation of this Policy or for seeking an accommodation will not be tolerated. Staff members who report a suspected instance of unlawful harassment or discrimination shall not be subject to reprisals, retaliation, retribution or other negative treatment as a result of the report. Prompt action will be taken to protect the reporting staff member from retaliation.
- B. Any person who retaliates against a good faith reporter of a potential violation of this Policy will be subject to immediate corrective action or discipline, up to and including termination from employment.

Non-Fraternization & Hiring of/Working with Relatives & Significant Others

Purpose:

To prevent conflicts of interest and other problems that may occur when multiple relatives or significant others (such as family members or those in a dating relationship) are associated with the organization.

Summary:

Pafford EMS shall allow relatives/significant others of existing personnel to perform services for the organization in limited circumstances and only in cases where potential conflict is minimal.

Scope:

All Pafford EMS personnel.

Definitions:

For the purpose of this Policy, the definition of “relative” includes: spouses, ex-spouses, parent/child, siblings, fiancés, persons in dating relationships, domestic partners, unmarried cohabitants, and 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 (e.g., adoptive parent and child relationship).

Procedure:

I. Standards.

- A. The employment of relatives and/or having relatives as members in the organization may cause serious conflicts and problems with favoritism and morale, and claims of partiality in treatment at work, as personal conflicts from outside the work environment can be carried into day-to-day working relationships.
- B. Additionally, personal relationships between employees outside of work can often have an adverse effect on the working relationship. Uncomfortable strain, allegations of sexual harassment, and other workplace distractions are all negative side effects of a personal relationship that may occur among personnel outside of the workplace.
- C. In the interest of maintaining a professional atmosphere in the workplace, Pafford EMS discourages romantic relations among personnel. However, in the event that a romantic relationship exists, the following activities are prohibited:
 - 1. Dating activities on Company time or Company property.

2. Use of Company property to arrange dating activities.
 3. Hand holding, kissing, hugging, sexual comments and other behavior generally associated with a dating or romantic relationship on Company time or Company property.
 4. Failure to report to management personal relationships involving personnel at different levels of the organizational structure.
- D. Except as may be approved by the Senior Leadership Team pursuant to the Conflicts of Interest Policy, relatives should only be employed if the employee is not directly supervised by the relative, does not work with the relative, or if the Senior Leadership Team determines the potential for conflict is minimal.
- E. If the relative relationship is established after employment/membership has begun or prior to the implementation of this Policy, the Senior Leadership Team will determine if the relationship poses or may pose a conflict. If the decision is that one relative must change positions, modify his or her work schedule, or resign, Pafford EMS will permit the individuals concerned to decide which one will make the change. If that decision is not made within 30 calendar days, the Senior Leadership Team will decide, and will make that decision in a non-discriminatory manner.
- F. To the extent that a dating relationship or romance occurs among two staff members, and the relationship interferes with the ability to perform job duties, or leads to a breach of our professional standards or inappropriate behavior, one or both of the personnel involved in the romance may be subject to discipline, or change in scope of job duties.

II. Policy.

It is the policy of Pafford EMS to monitor and regulate the employment of close relatives as follows:

- A. It is the responsibility of all Pafford EMS employees to report the existence of such a relationship to management as soon as possible.
- B. Conditions of Employment of Relatives:
 1. Except as may be approved by the Senior Leadership Team pursuant to the Conflicts of Interest Policy, relatives will not be scheduled together as partners on an ambulance at any time. There are isolated circumstances that relatives may be authorized to function as care-providing clinical partners. Examples may include: mass causality incidents, disasters, an ambulance assisting another ambulance, at the scene of incident requiring more than one ambulance, or in particular situations where it can be shown that there is no adverse impact on the performance of their work or the work of others.

2. Relatives may not perform or contribute to the evaluation of a relative.
3. Relatives may not perform an accident investigation when a relative is involved.
4. Relatives may not perform an injury investigation when a relative is involved.
5. Relatives may not be involved in the investigation or disciplinary process of any incident in which a relative is in any way connected.
6. Relatives may not approve paid time off or overtime for a relative.
7. Except for purposes of being one of two signatories on a check, relatives may not release Pafford EMS funds to a relative (such as, but not limited to, reimbursement for expenses).
8. Relatives may not co-sign narcotics with a relative.
9. Relatives may not participate in any aspect of the hiring process involving a relative.
10. Except as may be approved by the Senior Leadership Team pursuant to the Conflicts of Interest Policy, relatives should not supervise a relative.
11. Except as may be approved by the Senior Leadership Team pursuant to the Conflicts of Interest Policy, relatives should not serve on the Senior Leadership Team of Pafford EMS at the same time.
12. Except as may be approved by the Senior Leadership Team pursuant to the Conflicts of Interest Policy, relatives should not serve as elected officers of Pafford EMS at the same time.

C. Conflict Resolution Procedure:

1. Any Pafford EMS employees finding themselves in any of the above situations must immediately contact an ELT member for resolution.
2. Any ELT member finding himself or herself in any of the above situations must immediately contact another (unrelated) member of the ELT to resolve the situation.
3. Pafford EMS will not hire or transfer persons into a position that would create a conflict as described above. Persons who are elected by the membership into a position which would create a conflict will have 30 days to work out a resolution which will eliminate the potential for conflict. If

not completed within 30 days, the remaining members of the ELT will make the necessary changes to eliminate or at least minimize the conflict, which may include removing the elected person from office.

4. Employees who establish a relationship which would create a conflict within their current position or job roles, will have 30 days to affect a transfer or change in job or position status, which would eliminate the conflict. If not completed within 30 days, management will make the necessary changes to eliminate the conflict.
5. Violation of any of the above guidelines will result in disciplinary action to both parties regardless of which party benefited or who initiated the action.
6. Should the above guidelines be insufficient to avoid conflict involving one or more employees in a given situation, then one or both employees may be transferred to another job position or terminated to eliminate such conflict. Should the above guidelines be insufficient to avoid conflict involving one or more members in a given situation, then one or both members may be prohibited from working for the organization in any capacity which the Senior Leadership Team reasonably believes has the potential to create a conflict of interest in violation of this Policy and the Conflicts of Interest Policy.

Conflicts of Interest

The purpose of the following Policy and procedures is to prevent the personal interest of ELT Members and other personnel from interfering with the performance of their duties to the organization or resulting in personal financial, professional, or political gain on the part of such persons at the expense of the Pafford EMS, employees, officers, or directors.

Definitions:

Conflict of Interest (also Conflict) means a conflict, or the appearance of a conflict, between the private interests and official responsibilities of a person in a position of trust. Persons in a position of trust include employees, officers, directors, and ELT members of Pafford EMS.

Supporter means corporations, foundations, individuals, 501(c)(3) nonprofits, local, state or federal governments, and other nonprofit organizations who contribute to the Pafford EMS, either financially, or in-kind.

Policy and Practices:

I. Standards.

- A. Full disclosure, by notice in writing, shall be made by the interested parties to the full Senior Leadership Team in all conflicts of interest, including but not limited to the following:
 - 1. An ELT member is related to another ELT member or staff member by blood, marriage or domestic partnership.
 - 2. A staff member in an officer or supervisor capacity is related to another staff member whom she/he supervises.
 - 3. An ELT member, or an organization to which he/she belongs, or such organization's own members, stands to benefit from a transaction or payment other than for fair value and in the regular course of performing job responsibilities.
 - 4. An ELT member's organization receives a donation from the Pafford EMS.
 - 5. An ELT member or staff member is a member of the governing body of a contributor to the Pafford EMS.
- B. Following full disclosure of a possible conflict of interest or any condition listed above, the Senior Leadership Team shall determine whether a conflict of interest exists and, if so the ELT shall vote to authorize or reject the transaction or take any other action deemed necessary to address the conflict and protect Pafford EMS's best interests. Both votes shall be by a majority vote without counting the vote of

any interested ELT Member, even if the disinterested ELT Members are less than a quorum provided that at least one consenting ELT Member is disinterested.

- C. An interested ELT Member or other personnel shall not participate in any discussion or debate of the Senior Leadership Team, or of any committee or subcommittee thereof, in which the subject of discussion is a contract, transaction, or situation in which there may be a perceived or actual conflict of interest. However, he/she may be present to provide clarifying information in such a discussion or debate unless objected to by any present ELT Member.
- D. Anyone in a position to make decisions about spending resources (*i.e.*, transactions such as purchase contracts) – who also stands to benefit from that decision – has a duty to disclose that conflict as soon as it arises (or becomes apparent); that person should not participate in any final decisions.
- E. A copy of this Policy shall be given to all ELT Members, officers, directors, employees, and supporters upon commencement of such person's relationship with Pafford EMS, or at the official adoption of stated policy. Each individual receiving this Policy shall sign and date acknowledgement of receipt of a copy of the Policy at the beginning of his/her relationship with the Pafford EMS. The acknowledgement shall be maintained in his/her personnel file. Supporters' acknowledgements will be maintained in a central file. Failure to sign does not nullify the Policy.
- F. All ELT Members, Officers, employees, and supporters shall report, in writing, any change of status to any conflict of interest disclosure previously issued to the Senior Leadership Team.

Conflict Resolution & Problem Solving

Purpose:

To provide for an effective working relationship between staff members, and to have a mechanism in place to resolve problems as they occur.

Policy:

Pafford EMS will handle and resolve misunderstandings, conflicts, and complaints that may arise in a systematic and non-discriminatory manner to ensure appropriate resolution. This Policy is not intended to apply to complaints of discrimination or harassment. Please see Policy Against Harassment and Discrimination for information concerning such complaints.

Procedure:

I. Conflict Resolution.

- A. When a complaint or conflict is apparent, personnel should first discuss the situation with a supervisor, preferably immediately following the event or incident.
- B. Complaints received by any personnel coming from non-personnel (e.g. patients, family members, vendors, and business partners, regarding incidents of quality care and poor relations) shall be forwarded to a supervisor as soon as possible.
- C. The nature of the problem or complaint will be documented by the supervisor.
- D. The supervisor, or if more appropriate, another designated supervisor or manager or the Human Resources Department, will conduct an investigation of the problem.
- E. In cases where the problem relates to compliance, HIPAA, or raises a question of potential violation of federal or state law, appropriate persons shall be notified and involved (including but not limited to, the Compliance Officer, the Human Resources Department, and/or legal counsel).

II. Scope.

- A. Personnel are encouraged to present good faith concerns of any nature to their supervisor, or other manager. Such concerns may pertain to any work-related subject, including the following:
 - 1. Scheduling conflicts.
 - 2. Alleged harassment which may fall outside of the Policy Against Harassment and Discrimination.
 - 3. Perceived Policy violations.

4. Perceived HIPAA or other compliance issues.
5. Benefit or pay issues.
6. Personal conflicts among co-workers (e.g. incompatibility, or inability to work together).
7. Disciplinary actions.
8. Any perceived violation of the law, or any perceived unethical conduct.

III. Investigation Procedure.

- A. Management engaged in an investigation of any complaint will promptly, thoroughly, and impartially investigate any complaint or report made under this Policy.
- B. Personnel interviewed by management regarding a concern, complaint, suggestion, or conflict are expected to fully cooperate and offer information in a truthful manner.
- C. All attempts will be made to resolve problems in a quick and fair manner. Presenting conflicts, complaints, and suggestions is a useful mechanism to improve working conditions.
- D. Personnel offering complaints, conflicts and problems in good faith will not face retribution or retaliation.

Background Checks

Purpose:

To follow state and federal laws, and to ensure the highest degree of safety for our personnel and patients by adequately screening the background of our personnel.

Policy:

Pafford EMS shall require all necessary background checks, including state criminal record check, child (and elder abuse, if performed by the state) clearances, FBI criminal background check (where required), driving record, and other required background checks prior to any service performed by a potential employee. Each employee must satisfactorily complete the background check process prior to performing any service.

Procedure:

I. Federal and State Criminal History Record Background Checks.

- A. Each applicant (for employment) must provide necessary federal and state criminal background check results. Each applicant shall also complete a background check authorization form as provided in Pafford EMS's onboarding documents or through a third party agency.
- B. Each applicant must obtain and submit to Pafford EMS the necessary federal and state criminal record check results. New background check results must be provided within 60 months of the date of the most recent clearance. In addition to cooperating with the background check, each applicant (for employment or membership) must provide a list of all criminal convictions. Applicants will ordinarily not be permitted to perform services until Pafford EMS receives the results of the federal and state background checks and applicant listing.
 1. If any of the background checks or the applicant listing indicate that a potential employee has been convicted (including a plea of "no contest") of any crime that is relevant when considering employment or membership, he or she may not be eligible for employment or membership. Additionally, any employee who is later convicted of a crime may be subject to immediate termination of employment. Convictions for certain offenses will not necessarily preclude employment/membership, but will be considered in making employment decisions based on the relevance of the arrest/conviction to the work performed.
 2. If all of the background checks return with no record of conviction or arrests, the applicant may be permitted to perform services and may be hired.

3. If any of the background checks or applicant listing returns with a record of a conviction that may be relevant to the hiring decision, Pafford EMS will conduct a targeted screen, considering the nature of the crime, the time elapsed, and the nature of the job at issue. If an applicant may be excluded from employment because of past criminal conduct, he or she will be provided an opportunity to provide any information demonstrating that exclusion is not warranted under the circumstances. Relevant information which may be considered includes: (a) the facts and circumstances surrounding the offense, (b) the number of offenses for which the individual was convicted, (c) The age of the individual at the time of conviction and release, (d) evidence that the individual performed the same type of work, post-conviction, with the same or a different employer with no known incidents of criminal conduct, (e) the length and consistency of employment history before and after the offense or conduct, (f) rehabilitation efforts such as education or training, (g) employment or character references, or (h) any other information regarding fitness for the position
 4. When an applicant will be precluded from employment, he or she will receive notice that he or she is precluded from employment because of the results of the criminal background check.
 5. Under Louisiana law, enforced by the Louisiana Department of Health, certain criminal convictions will automatically preclude employment in certain positions, including (but not necessarily limited to) licensed ambulance personnel or non-licensed persons who provide nursing care or other health related services as defined by law. Please see the Human Resources Department for details regarding exclusionary convictions and covered positions.
- C. An applicant (for employment or membership) who does not cooperate with the criminal history records check process will not be considered for employment.
- D. Pafford EMS requires that additional federal and state criminal background checks be resubmitted no later than 60 months after the date printed on the criminal record check results. Full cooperation with the resubmission of the federal and state criminal background checks is expected, and failure to cooperate will result in discipline, up to and including termination.
- E. All personnel have an ongoing obligation to disclose to Pafford EMS any convictions and criminal charges during their employment/membership. Personnel who fail to make such a disclosure will be subject to appropriate discipline.

II. Child and Elder Abuse Clearances.

- A. Each applicant must provide child and elder abuse clearances (unless one of these is not performed by the state). Each applicant shall also complete a background check authorization form.

- B. Each applicant must obtain and submit to Pafford EMS the necessary federal and state criminal record check results. New background check results must be provided within 60 months of the date of the most recent clearance. Applicants will ordinarily not be permitted to perform services until Pafford EMS receives the child and elder abuse clearances.
- C. An applicant who does not cooperate with the child and elder abuse clearances will not be considered for employment/ membership.
- D. Pafford EMS requires that additional child and elder abuse clearances be resubmitted no later than 60 months after the date printed on the clearances. Full cooperation with the resubmission of the clearances is expected, and failure to cooperate will result in discipline, up to and including termination.

III. Driving Record Background Check for All Personnel Whose Participation Involves the Operation of a Motor Vehicle.

- A. Individuals with a poor driving record may not be permitted to operate Company vehicles, and in some cases, may not be considered for employment. Each applicant whose duties may require driving is required to submit necessary information to Pafford EMS to enable Pafford EMS to obtain a copy of the driving record from the applicable state agency (e.g., Department of Transportation).
- B. Any applicant who does not cooperate with the driver record check process will not be considered for employment.
- C. At all times during employment, personnel must meet the following criteria while operating Company vehicles:
 - 1. They must have a valid driver's license (where work requires operation of a Company vehicle).
 - 2. They must observe all traffic laws.
 - 3. They must not be addicted to, or under the influence of, alcohol illegal or unauthorized drugs, or medications which may impair the ability to safely operate a vehicle.
 - 4. They must be free from physical or mental impairments that may adversely affect the person's ability to drive and pose a danger to self or others, if those impairments cannot be reasonably accommodated.
 - 5. If operating Company emergency vehicles, they must have successfully completed an Emergency Vehicle Operator's Course ("EVOC") of instruction.

- D. Any changes in a personnel driving record (such as conviction for speeding, or any conviction for a moving traffic violation) must be reported to a supervisor immediately. Failure to do so may result in disciplinary action, up to and including termination.
- E. Prior to being offered a position with Pafford EMS that involves driving of Pafford EMS vehicles, applicants must have successfully completed an EVOC and possess any other state-required certifications for operating ambulances, and provide copies of each of these certificates to Pafford EMS.

IV. Review of OIG Exclusions.

- A. The Department of Health and Human Services, Office of Inspector General (OIG), reports those individuals or organizations that have been excluded from participating in federal health care programs. Those on the excluded list are not permitted to provide services that will be billed to a federal health care program (such as treating Medicare/Medicaid patients) and are not permitted to be involved in billing or related functions.
- B. As part of its application process, Pafford EMS will research the OIG's database for possible applicant exclusion. Exclusion from any federal health care program constitutes grounds for disqualification of employment.
- C. Personnel have an ongoing obligation to report to management if they receive notification that they have been excluded from participating in federal health care programs.
- D. Pafford EMS will conduct periodic re-checks of the OIG exclusion database. In the event that a current employee is found to appear on the exclusion list, termination of employment may be required.

V. References.

- A. Applicants shall provide a list of references, including past employers. References shall not include family members and social friends.
- B. Pafford EMS may contact each named reference to confirm the qualifications, abilities, or character of each applicant.
- C. Any applicant who does not supply references will not be considered for employment or membership.

VI. Medical Examination.

- A. All applicants are required to meet the required physical requirements for the applied for position, as established by Pafford EMS. All candidates must pass a post offer physical examination, which may also include an assessment of

reasonable accommodations that may be requested by the applicant. The employment physical is provided at no cost to the applicant and may include medical history, x-rays, laboratory tests, and a drug screen.

- B. Where permitted by state and federal law, additional physical examinations may be required periodically as a condition of continued employment to ensure continued ability to perform the physical requirements of the job.

Reporting Suspected Child/Elder Abuse

EMS Personnel of Pafford EMS must make a report of suspected child or elder abuse if he or she has reasonable cause to suspect that a child or elderly person is a victim of abuse under any of the following circumstances:

- The staff member comes into contact with the child or elderly person in the course of employment/membership with Pafford EMS, or through a regularly scheduled program, activity or service of Pafford EMS.
- The staff member is directly responsible for the care, supervision, guidance, or training of the child or elderly person, or is affiliated with an agency, institution, organization, school, regularly established church or religious organization or other entity that is directly responsible for the care, supervision, guidance or training of the child or elderly person.
- A person makes a specific disclosure to the staff member that an identifiable child or elderly person is the victim of abuse.
- An individual 14 years of age or older makes a specific disclosure to the staff member that the individual has committed child/elderly abuse.

Staff members who suspect that a child or elderly person who they have come into contact with in the course of their employment/membership must:

- A. File the report themselves; and
- B. Notify their supervisor of the suspected child abuse.

A supervisor is NOT permitted to obstruct, or in any way prohibit a staff member from making a good faith report of suspected child/elderly abuse.

EMS providers must also follow all applicable EMS protocols concerning cases of suspected child abuse, including reporting the case to the receiving physician and to law enforcement, and documenting the case on the patient care report. Please keep in mind that if you witness suspected abuse, you need to report it. Do not rely on the fact that you were not the crew member in charge on that call.

The identity of the person making the report is kept confidential with the exception of being released to law enforcement officials or the district attorney's office.

Telephone Procedures and Personal Telephone Use

Purpose:

To maintain phone lines accessible for business purposes, avoid distractions, and maintain uninterrupted telephone service.

Policy:

The telephone system is for Company business. Pafford EMS limits personal phone calls while on duty.

Procedure:

I. Personal calls.

- A. Phone lines are reserved for Pafford EMS business only. Personal incoming and outgoing phone calls are discouraged, and should be used for emergency purposes only.
- B. If personal calls must be made or received, conversations should be limited to five (5) minutes.

II. Answering the phone.

“Hello, Pafford EMS, this is... How may I help you?” and “Thank you for calling, have a nice day.”

Mobile Device and Camera Use

Purpose:

To prevent distractions in the workplace and help ensure the safety of all personnel and the patients we serve.

Policy:

During working time - all time when an employee is expected to be performing job functions - the use of mobile devices of any kind for personal communications of any type shall be limited to necessary work-related communications made on work-issued phones. Use of personal mobile devices is only permitted during limited times when work responsibilities have been completed and there are no additional work responsibilities that personnel should be performing.

Procedure:

I. Personal Mobile Devices.

- A. Personal cellular telephones and other small mobile devices are permitted to be carried while on duty, but must be placed on silent mode, and allow voice mail to answer calls. Messages/texts may be checked on “down time” when not actively involved in a call or performing work duties and when there are no additional work duties that personnel should be performing. All personal electronic devices must be “intrinsically safe,” consistent with the national standards for portable electronic equipment carried by emergency service personnel into hazardous environments, and be carried in a safe and concealed area on the person that does not interfere with the physical requirements of the job, will not fall off, or cause others to be distracted by the presence or appearance of the device. Personal mobile devices must remain in the employee’s personal locker, a secure location or in the ambulance, and must not be worn or used when treating patients or on calls.
- B. Personal communications or mobile device use must never be a cause for a delay in responding to a patient or beginning or completing an assignment, and should never be used while completing an assignment or when any assignment or work-related duty needs to be completed or is supposed to be completed.
- C. While attending to a patient or while operating a Company vehicle or while a passenger in a Company or other EMS vehicle, personnel shall not, under any circumstances, utilize personal mobile devices for any reason. This means that while attending to a patient or operating a Company vehicle or a passenger inside a Company vehicle, Company personnel are prohibited from using personal devices to make calls, reviewing or replying to texts, checking or sending emails, opening or checking Apps, opening or playing games, watching or taking any pictures/videos/movies/shows/clips/ memes/etc., reading any reading materials, or utilizing the device for any other reason. The use of personal mobile devices is also

at all times prohibited while in any aircraft as a passenger or crewmember, or while walking near an aircraft or vehicle.

- D. Personnel are prohibited from using personal mobile devices between the dispatch of a call and the time that the call is cleared, the ambulance is back at the station, and the patient care report has been completed and submitted. This is to prevent any distractions while engaged in patient care or the documentation of patient care, and to avoid any possible interference with equipment that may occur based upon the mobile device activity.
- E. In the interest of protecting employee documents, patient confidentiality, and to prevent the capture of inappropriate data, under no circumstances shall any personnel be permitted to utilize the camera on their personal mobile devices while in the station or on duty.
- F. The use of personal mobile devices must also be used in compliance with all other policies contained in this Handbook, and should not be used in violation of the Computer, Internet and Email Policy or the Policy Against Harassment and Discrimination, or for any other purpose which would result in a violation of the policies contained in this Handbook.

II. Company-Issued Mobile and Electronic Devices.

- A. Except with prior permission of Pafford EMS, Company-issued mobile devices shall be used for Company business only. Likewise, all other Company-owned electronic devices shall be used for Company business only, including, but not limited to, making contact with dispatch, medical command, or a receiving hospital and communicating between Company crews and management.
- B. Except as otherwise authorized by Pafford EMS, Company-issued mobile and electronic devices may be used for important and time-sensitive personal purposes, but conversations and sending/receiving messages shall be limited to five (5) minutes, and never be a cause for a delay in responding to a patient or beginning or completing an assignment.
- C. Personnel should not utilize a Company-issued mobile devices while driving. If cellular or other communication is necessary and there is a passenger in the front of the ambulance with the driver, the passenger must handle the device. Personnel working aboard one-person vehicles must minimize the use of Company-issued mobile and electronic devices, cellular telephone, or PDA while driving. If cellular communication is necessary, a member of the crew other than the driver shall handle the telephone, except in absolute emergencies. Where necessary and possible, Pafford EMS will install compatible hands-free cellular telephone equipment in one-person vehicles.
- D. Crews shall keep a radio or truck iPad with them at all times for call alerting and safety.

III. Camera/Video Use.

- A. Except as set forth below, under no circumstances shall any personnel be permitted to use the camera or video function of a personal mobile device or camera while on duty.
- B. Except as previously authorized by Pafford EMS, Personnel are only permitted to use the camera feature on Company-issued and authorized mobile devices or cameras while on duty. Personnel are not permitted to use any other picture or video-taking devices while on duty, unless given express permission by a supervisor to do so. The camera feature on Company-issued mobile devices is intended to be used for medical purposes only, such as to document the position of vehicles or patients at the scene of an accident or to document the mechanism of injury for use by the receiving facility to aid in treatment. All images, pictures and/or videos taken on-scene shall be uploaded or downloaded or printed (as the case may be) and attached to the patient care report and other documentation for that call at the time the patient care report is drafted.
- D. All on-scene photography and videography shall be for clinical and/or documentation purposes only and conducted at the direction of Pafford EMS personnel in charge at the scene or by medical command.
- E. Any photographs or videos containing individually identifiable information are covered by the HIPAA Privacy Rule and must be protected in the same manner as patient care reports and other such documentation.
- F. Any on-scene images, videos and/or pictures, and any other images, videos and/or pictures taken by any employee or member in the course and scope of their employment/membership are solely the property of Pafford EMS and are not the property of the individual staff member. This includes any image, video or picture inadvertently taken or otherwise taken in violation of this Policy with a staff member's personal mobile device or other device capable of taking still or moving images and/or sounds.
- G. If a staff member has taken an on-scene image, picture or video with his/her personal mobile device or other personal device capable of taking still or moving images and/or sounds, he/she is to immediately after discovery (or while drafting the patient care report if the discovery is during a call) upload or download (as the case may be) the image/video/picture and attach it to the patient care report and then delete all copies and back-ups of the image/video/picture on the individual's mobile device/other device capable to taking still or moving images and/or sounds.
- H. Other than uploading or downloading images/video/pictures to ensure that they accompany patient care reports and sharing the images/videos/pictures with patient's treating physical/medical staff at the receiving facility, no images, videos, or other recordings taken by a staff member in the course of performing work related duties may be used, printed, copied, scanned, emailed, uploaded, posted,

shared or distributed in any manner without the express, written approval of Pafford EMS's HIPAA Compliance Officer or his/her superior. This prohibition includes posting photos, videos or images on personal web sites such as (but not limited to) Facebook, YouTube, Instagram, Snapchat, LinkedIn, Twitter, or other social media and/or websites, or emailing, texting or otherwise sending images or videos to friends, colleagues, or others.

- I. Nothing in this Policy is intended to or should be interpreted to restrict an employee's lawful exercise of any right provided by the National Labor Relations Act.

Computer, Internet & E-Mail Use

Purpose:

To maintain a respectable and ethical work environment as well as ensure the proper use of all electronic equipment.

Policy:

Pafford EMS permits the proper use of computers, internet and electronic mail in accordance with these guidelines to ensure appropriate communications and to protect the integrity and security of our information system. In this Policy, whenever the term “computer” is used, it is intended to encompass laptops, desktops, tablets, iPads, mobile devices, Echo/Dot-type devices, and any other electronic device capable of connecting to the internet or sending or receiving emails or other electronic messages.

Nothing in this Policy is intended to prevent and should not be interpreted in a way that would prevent employees from exercising their rights to discuss or criticize Pafford EMS’s wages, benefits, hours or other working conditions, or to affect any other rights under Section 7 of the National Labor Relations Act.

Procedure:

I. Computer Use.

Company-issued computers (which includes laptops, desktops, tablets, iPads, mobile devices, Echo/Dot-type devices, and any other electronic device capable of connecting to the internet or sending or receiving emails or other electronic messages), computer files, the e-mail system, and software furnished to personnel are Pafford EMS property intended for business use. Personnel must never use personal computers to access Company files, Pafford EMS network, Pafford EMS computer system, or other electronically stored Company data, property, or information. To ensure compliance with this Policy, Company computer and e-mail usage may be monitored. All recorded communication and data files using Company-issued computers are the property of Pafford EMS. All recorded communication and data files created during the course and scope of Pafford EMS work or duties while using personal computers (which is in violation of this Policy) are also the property of Pafford EMS.

Pafford EMS strives to maintain a workplace free of harassment and which is sensitive to the diversity of its personnel. Therefore, Pafford EMS prohibits the use of computers and e-mail system in ways that are or could be considered to be offensive, hostile or harassing with respect to anyone’s race, color, national origin, ancestry, religion, sex, age, disability, political belief, military service, or any other protected class.

For example, the display or transmission of sexually explicit or racist images, messages, and cartoons, as well as ethnic slurs, racial/racist comments, off-color jokes, and making fun of or teasing someone because of their religion or disability are not allowed using Company-owned

computers or using personal computers while on duty or performing or engaging in Company-related duties or activities.

Company e-mail may only be used for business purposes and may not be used for purposes of any type of solicitation, internal or external.

Pafford EMS purchases and licenses the use of various computer software for business purposes and does not own the copyright to this software or its related documentation. Unless authorized by the software developer, Pafford EMS does not have the right to reproduce such software for use on more than one computer.

Personnel may only use software on local area networks or on multiple machines according to the software license agreement. Pafford EMS prohibits the illegal duplication of software and its related documentation.

Personnel must notify their supervisor or any member of management upon learning of violations of this Policy. Personnel who violate this Policy will be subject to disciplinary action, up to and including termination of employment.

II. Internet Use.

Internet access is provided by Pafford EMS to assist certain designated employees/members in obtaining work-related data and technology. The following guidelines have been established to help ensure responsible and productive internet usage. While internet and electronic mail usage is intended for job-related activities, personal use may be permitted with prior authorization.

All internet data or electronic mail that is composed, transmitted, or received via our computer communications systems is considered to be part of the official records of Pafford EMS and, as such, is subject to disclosure to law enforcement or other third parties. Consequently, personnel should always ensure that the business information contained in internet email messages and other transmissions is accurate, appropriate, ethical, and lawful.

The equipment, services, and technology provided to access the internet and electronic mail system remain at all times the property of Pafford EMS. As such, Pafford EMS reserves the right to monitor internet traffic, and retrieve and read any data composed, sent, or received through our online connections and stored in our computer systems.

Data that is composed, transmitted, accessed, or received via the internet or electronic mail must not contain content that could be considered offensive, hostile or otherwise a violation of the Policy Against Harassment and Discrimination.

The unauthorized use, installation, copying, or distribution of copyrighted, trademarked, or patented material on the internet or through electronic mail is expressly prohibited. As a general rule, if an individual did not create material, does not own the rights to it, or has not gotten authorization for its use, it should not be put on the internet. Personnel are also responsible for ensuring that the person sending any material over the internet has the appropriate distribution rights.

Abuse of the internet access and electronic mail system provided by Pafford EMS in violation of law or Pafford EMS policies will result in disciplinary action, up to and including termination of employment or services. Personnel may also be held personally liable for any violations of this Policy. The following behaviors are examples of previously stated or additional actions and activities that are prohibited and can result in disciplinary action.

- A. Viewing and accessing sexually explicit or offensive materials, or which may be offensive, hostile or harassing with respect to anyone's race, color, national origin, ancestry, religion, sex, age, disability, political belief, military service, or any other protected class.
- B. Use of the Company's internet for unlawful purposes such as:
 - 1. Downloading or copying information (e.g., sounds, images, documents, etc.) or programs in violation of copyright and software licensing laws.
 - 2. Using the internet for unauthorized access to other computer systems.
 - 3. Using the internet to distribute or receive destructive programs (i.e., viruses and/or self-replicating code), etc.
- C. Use of the Company's internet for personal commercial or profit-generating activities or for personal advertisements, solicitations, promotions, political material, or any other similar purposes.
- D. The downloading of programs and other executable files (without prior permission from the management), since typical work related internet research and use should not require the download of any additional programs. Downloading programs without authorization is prohibited.
- E. Other specific violations include, but are not limited to¹:
 - Communicating, sending or posting discriminatory, harassing, or threatening messages or images in violation of Pafford EMS's policies or the law.
 - Accessing any web sites or video clips that are pornographic in nature, including any "adult sites."
 - Using the organization's time and resources for personal use or pleasure without prior authorization.
 - Stealing, using, or disclosing someone else's code or password without authorization.

¹ Again, these examples are not intended to, and should not be interpreted as, affecting any employees right to engage in protected concerted activity concerning employment terms and conditions.

- Copying, pirating, or downloading software and electronic files without permission.
- Sending or posting confidential material or information pertaining to Pafford EMS, its personnel and/or its patients.
- Violating copyright law.
- Failing to observe licensing agreements.
- Engaging in unauthorized transactions that may incur a cost to the organization or initiate unwanted internet services and transmissions.
- Participating in the viewing or exchange of pornography or obscene materials.
- Communicating, sending or posting libelous or slanderous messages/information
- Attempting to break into the computer system of another organization or person.
- Refusing to cooperate with a security investigation.
- Jeopardizing the security of Pafford EMS electronic communications system.
- Sending or posting false messages about another organization's products or services, including other ambulance companies.
- Passing off personal views as representing those of the organization.
- Engaging in any other illegal activities or assisting others to engage in such activity via the computer equipment, electronic mail or the internet.

III. E-Mail.

- A. E-mail is not a private communication system that may be used freely. Personnel shall not use Company e-mail to send information or discuss matters they wish to remain private (or not be publicly known) about anyone, including themselves.
- B. Except as may be specifically permitted under our organization's policies, patient information should not be discussed over e-mail.
- C. Any remark about any person or group of persons which may be libelous, offensive, hostile, and defamatory or in violation of the Policy Against Harassment and Discrimination using e-mail is prohibited.
- D. Improper use of Company e-mail may also expose personnel to criminal charges separate and apart from disciplinary action.
- E. Company e-mail use is reserved for business purposes only.

IV. Access and Security.

- A. Under no circumstances should personnel be logged in under someone else's user name or use any computer on which they have not logged in under their own name.
 - 1. When personnel uses a machine not assigned to him or her, he or she should, out of courtesy, ask the permission of the employee who is assigned to that particular machine.
 - 2. For security purposes, personnel should log out of the computer system when they will be away from their desk for a prolonged period of time or use an automatic screensaver password to prohibit others from utilizing an unauthorized machine.
- B. Accessing internet sites may identify to third parties both the user's name and Pafford EMS name. Appropriate caution must be exercised in accessing sites.
 - 1. Disclosing privileged and/or confidential information over the internet must not occur.
 - 2. Many Websites have software, which can identify the user accessing the site. When accessing sites, be aware that such access may be tagged or identified with an identifying name and Pafford EMS name.
 - 3. The intentional access and use of internet sites in a manner that could compromise Pafford EMS's computer/internet systems, patient data, or confidential Company data/information in any manner is prohibited.
- C. Pafford EMS personnel have no expectation of privacy while using Company computer equipment, internet sites, email, or other electronic mechanisms. Pafford EMS has the ability to and will monitor internet access (all messages sent, sites accessed, and information downloaded). All such information is the property of Pafford EMS. Pafford EMS reserves the right to review and disclose such records or information with or without prior notice. Computer hard drives will contain a history of sites recently visited and information (such as text and graphics) from those sites.
- D. Personnel are not permitted to use their own computer or mobile electronic devices to access Pafford EMS's LAN, VPN, network or e-mail systems with such personal devices unless prior approval is granted. All internet, network and e-mail access on Company property or for Company purposes must be made through Pafford EMS equipment. Use of Pafford EMS WiFi is not private and can be monitored at any time. Pafford EMS, through its I.T. Department, reserves the right to refuse personal devices connecting to Pafford EMS WiFi.
- E. To ensure a malware-free environment, nothing (including files, apps, programs, etc.) may be downloaded from the internet or from an electronic mail message without prior authorization. Personnel shall not open any emails from unknown

senders. Personnel shall not open any email attachments if they were not expecting the attachment without first confirming with the sender that the attachment was intended to be sent. Personnel shall only visit trusted, secure websites in the internet.

- F. Personnel shall immediately report any suspected malware attack (intrusive software, including computer viruses, worms, Trojan horses, ransomware, spyware, adware, scareware, and other malicious programs) to the I.T. Department, via the Helpdesk and, to the extent possible, isolate the machine from the internet by disconnecting physical cables and/or disabling wireless internet access.

Social Media

Purpose:

At Pafford EMS, we understand that social media can be a fun and rewarding way to share your life and opinions with family, friends, co-workers, or others around the world. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established this Policy.

We are committed to ensuring our personnel's use of social media does not violate federal or state privacy, copyright, defamation or discrimination laws. For example, Pafford EMS is required under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") to ensure that any protected health information ("PHI") that we create, receive, use, or store is not improperly used or disclosed through any means, including the internet. We are also committed to, and have a legitimate interest in, protecting our business interests, our working relationships with other organizations, and our confidential and proprietary information.

This Policy is not intended to restrict your legal rights, such as your right to engage in responsible social media discussions about things such as wages, benefits, hours, or working conditions. Rather, this Policy is designed to help avoid claims against Pafford EMS or its personnel for things like: HIPAA violations, invasion of privacy, breach of contract, defamation, unlawful discrimination, and unlawful harassment. Put simply, it helps protect you and our Agency.

Neither this Policy nor any other Policy in this Handbook will be applied or construed in any way that might limit or improperly interfere with any applicable legal rights of Pafford EMS staff members, including, but not limited to, any rights under federal or state labor laws.

Scope:

This Policy applies to all Pafford EMS personnel. This Policy applies to activity on the internet including, but not limited to, social media sites such as Facebook, Twitter, Instagram, Flickr, YouTube, Snapchat, etc., as well as other websites (such as web blogs) – basically any internet site where you can post information and/or images and communicate electronically.

Definitions:

"Confidential or Proprietary Information" includes, but is not limited to, information that is not publicly known about: confidential business processes, products, deployment strategies, operational systems, marketing plans, customers, contracts, computer systems, revenues, billing systems, internal reports, confidential business policies and plans, internal business-related confidential communications, patient lists, intellectual property, and confidential information about the health of other staff members or disciplinary actions that a staff member wants to remain private, or other improperly obtained or accessed Agency information.

"Protected Health Information" is any individually identifiable information that is received, created, maintained or transmitted by Pafford EMS in any form or media (electronic, paper, or oral) and relates in any way to an individual's healthcare. Individually identifiable information is

information that either identifies the individual or for which there is a reasonable basis to believe it can be used to identify the individual.

“Social Media” are internet-based sites or tools that facilitate information sharing among individuals, including, but not limited to, sites such as Facebook, Twitter, Flickr, Instagram, YouTube, Snapchat and other social media such as web blogs.

“Social Networking” is any means of communicating or posting information or content of any sort on the internet, including to your own or someone else’s web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin ELT or a chat room, whether or not associated or affiliated with Pafford EMS.

Procedure:

In general, personnel should think carefully before posting online, because most online social platforms are open for all to see. Despite privacy policies, personnel cannot always be sure who will view, share, or archive the information that is posted. Before posting anything, you should remember that you are responsible for what is posted online. It is always best to carefully consider the risks and rewards with respect to each posting, and to use your best judgment and exercise personal responsibility when posting to any social media sites. If you have any doubt about what you are about to post online, it is probably better not to post it, since once something is placed in cyberspace, it is often difficult to retract the message or image.

Pafford EMS will apply this Policy in a fair and non-discriminatory manner, consistent with all applicable laws. Keep in mind that any conduct that adversely affects your job performance, the job performance of other staff members, our patients, customers, suppliers, other agencies or entities we work with (including others who work on behalf of our Company), or otherwise adversely affects the legitimate business interests of Pafford EMS may result in corrective counseling or disciplinary action up to and including termination.

I. What You May *Not* Post on the Internet and Social Media.

Posting the following types of information on the internet is *specifically prohibited* under this Policy and may lead to corrective counseling and discipline up to and including termination:

A. Protected Health Information. You may not post or otherwise disseminate protected health information (PHI) on the internet or social media site in any form (text, photo, audio, or video). Information that you learn and/or collect about patients while performing duties for Pafford EMS is generally going to fall under the category of PHI whenever it identifies or reasonably could be used to identify a patient. Things that identify a patient or otherwise could include sufficient information to constitute PHI include, but are not limited to, a patient’s:

- First, last or full name
- Street address, city, county, or zip code
- Date of birth

- Phone number
- Social security number
- Medical record number
- Health plan number
- Account number
- Driver's license number
- Vehicle identification number or license plate number
- Image or video where the image or video shows the patient's face or other identifying feature
- Images or videos of a patient's body or body parts
- Information about specific response locations and destinations
- Information about the nature of an illness, injury, or incident

Please refer to the definition of PHI in this Policy and ask our Compliance Officer if you have any questions about what is PHI. A good question to ask in order to determine whether the information is PHI is this: *Would someone who knows the patient be able to identify the patient from the information?* If so, as a general rule you should not post it.

- B. Confidential or Proprietary Information about Pafford EMS or the Agencies We Work with.** You may not post confidential or proprietary information about Pafford EMS or any organization or person that Pafford EMS interacts with in conducting business. This means you should not be sharing things like undisclosed details that are not publicly known or obtainable about our contractual arrangements or other confidential business information with other parties. Please refer to the definition of confidential or proprietary information in this Policy, and you may consult with a supervisor if you have any questions about what information might fall under this definition.
- C. Explicit or Obscene Sexual Images or Content.** You may not post lewd or obscene photographs, images, or any content (text, images or videos) of a sexually explicit nature while on working time, in work locations, when using work-related equipment, or while in Pafford EMS uniform or with work equipment or company logos in view.
- D. Unauthorized Postings Portrayed as Being from Pafford EMS.** You may not represent that you are speaking or posting on behalf of Pafford EMS without the permission of the Agency. You should never represent yourself as a spokesperson for Pafford EMS unless you are designated as a spokesperson for the Agency. You may not create or post material which has the intent or effect of misleading individuals to believe it is sponsored, owned, or sanctioned by Pafford EMS without express written permission.
- E. Content That Unlawfully Harasses, Threatens, or Discriminates Against Others.** You may not post content that violates our policies against unlawful harassment and discrimination. Carefully read these policies and ensure your

postings are consistent with them. Postings that include discriminatory remarks, harassment, and threats of violence or similar unlawful conduct will not be tolerated. Examples include inappropriate sexual comments about other staff members or discriminatory comments which otherwise violate our Policy Against Workplace Harassment and Discrimination.

II. General Rules About Social Networking Related to the Workplace.

- A. No Expectation of Privacy on Company Devices.** You should be aware that any internet activity performed on Company-owned, operated, or controlled equipment or via Company internet (hard-wired or wireless) may be monitored at any time and without notice to ensure compliance with the law and this Policy. This includes Company workstations, laptops, tablets, mobile data terminals, smart phones, and other electronic devices. Pafford EMS personnel have no expectation of privacy when using Company equipment or internet.
- B. No Access to Illegal or Pornographic Sites.** You may not access any unlawful sites or any lewd or sexually explicit sites (such as pornography sites) through Pafford EMS equipment or through Pafford EMS internet connection (hard-wired or wireless) at any time. In addition, you may not access such sites with personal equipment while on Pafford EMS premises or property or at any time through Company hard-wired or wireless networks or equipment.
- C. No Social Networking during Working Time.** You should not engage in social networking activities while engaged in patient care activities or in patient care areas, while performing work duties (including when operating Pafford EMS vehicles or while in a Company vehicle even when not driving) or when work assignments (such as clean up, restocking, or PCR completion) are not completed. However, you are permitted to access the internet on your own personal equipment when you are not on working time. Non-working time is when you have completed all work duties and no assignments or work is pending, such as when you are on a designated meal or break period, or when you would otherwise be permitted to watch TV, relax in the crew lounge, or engage in other personal activities while on duty.
- D. No Taking Videos or Images during Responses or in Areas Where PHI May be Exposed.** To avoid the potential risk of improper disclosure of PHI, as well as to avoid unsafe distractions, you should refrain from taking any images or videos of any kind while on an incident response, while treating or transporting patients or otherwise engaged in incident activities unless expressly authorized to do so by Pafford EMS. Remember, your main focus should be on patient care and the incident itself. This prohibition includes taking videos or images in the billing office, file room, or other areas where patient information may potentially be captured in an image.
- E. Posting on Pafford EMS-Sponsored Sites.** Pafford EMS may use various internet and social networking tools to communicate with and engage the public and our

staff members. Those tools (Facebook, YouTube, Twitter, Instagram, etc.) are meant to be used in support of Pafford EMS's business objectives. If Pafford EMS engages in such communication, the following procedures apply -- both on Pafford EMS-sponsored sites and in official comments on other sites:

- Pafford EMS's social networking or blog posts and comments will be accurate and factual and Pafford EMS will acknowledge and correct mistakes promptly.
- On any official sites, pages, or blogs, Pafford EMS will at its discretion delete spam and comments that are off-topic or inappropriate and will reply to emails and comments when deemed appropriate.

F. Sensitive Personal Information about Others. To reduce the risk of identity theft, Medicare and Medicaid fraud, illegal stalking, and other similar illegal conduct, you should not disclose personally identifiable information (such as contact information obtained from Pafford EMS files or records), Social Security numbers, credit or debit card or financial account numbers, medical insurance or account numbers or other similar information about staff members, patients, customers or vendors on the internet.

G. Use of Pafford EMS Logo and Uniforms in Images or Video. You should not use the Pafford EMS logo, trademark or proprietary graphics in a way that violates copyright and other intellectual property laws or while you are engaged in any conduct that violates the law or Pafford EMS policies. For example, you should not post images or videos of yourself or your co-workers that identify you as Pafford EMS staff members or that show you in an Pafford EMS uniform when that image or video depicts you or your co-workers engaging in what appears to be illegal or obscene conduct (such as acts of violence or the use of illegal drugs), or violations of Company policy, even if it is being done as a joke.

III. Guidelines for Posting on the Internet and Social Media.

The following are intended as suggestions to help guide you when posting images or content on the internet. These are things you should consider while engaged in social networking activities:

A. Make it Clear You are Speaking on Your Own Behalf. If it is not obvious from the content, if you post any comments about Pafford EMS on the internet you should consider:

- Disclosing your connection with Pafford EMS.
- Using a personal email address (not your Pafford EMS address) as your primary means of identification and contact.

Whenever possible, you should make it clear you are speaking for yourself and not on behalf of Pafford EMS when posting any content related to Pafford EMS. Where it is not clear or obvious from the content that the post is your own opinion or view and not that of Pafford EMS, you should consider using the following disclaimer:

"The views expressed on this [post; blog; website] are my own and have not been reviewed or approved by my employer."

You should consider adding this language in an "About me" section of your blog or social networking profile.

- B. Be Considerate.** You should be fair, courteous, and considerate of Pafford EMS staff members, our customers, other agencies we work with and, most importantly, our patients when posting on the internet and social media sites. We have internal resolution procedures that you may consider using instead of posting complaints to a social media site. Nevertheless, if you decide to post complaints or criticism, you should avoid using statements, images, video or audio that reasonably could be viewed as malicious, obscene, vulgar, threatening or intimidating, defamatory, that disparages patients, other personnel, and other agencies with whom we work, or that might constitute illegal harassment or bullying, or illegal discrimination. Examples of such conduct might include offensive posts meant to harm Pafford EMS or an individual; or posts that could contribute to a hostile work environment or discriminate on the basis of age, race, sex, sexual orientation, national origin, ethnicity, disability, religion, veteran's status or other legally protected class, status, or characteristic.
- C. Be Honest and Accurate.** You should strive to always be honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open and honest about any previous posts you have altered. Remember that the internet archives almost everything; so even deleted postings can often be recovered. You should not post any information or rumors that you know to be false about Pafford EMS, other personnel, customers, patients, our business partners or our competitors.

IV. Retaliation is Prohibited.

Pafford EMS prohibits taking adverse action against any staff member who makes a good faith report of a possible violation of this Policy or for cooperating in an investigation. Any staff member who retaliates against another staff member for reporting a possible deviation from this Policy or for cooperating in an investigation may be subject to disciplinary action, up to and including termination from employment.

V. Any Questions, Contact a Supervisor.

If you have any questions about the details or scope of this Policy, please contact your supervisor or another member of management. If you are unsure if a comment or image you are about to post is acceptable or not acceptable under this or any other Pafford EMS

Policy, you are always welcome to discuss it with your supervisor or another member of management.

Workplace Monitoring

Workplace monitoring may be conducted by Pafford EMS to ensure quality control, personnel safety, security and patient/customer satisfaction. As such, computer usage and files may be monitored or accessed.

Pafford EMS also conducts video surveillance of non-private workplace areas. Video monitoring is used to identify safety concerns, maintain quality control, promote security and patient/customer satisfaction, detect theft and misconduct, and discourage or prevent acts of harassment and workplace violence. The video monitoring includes audio recording.

Because Pafford EMS is sensitive to the legitimate privacy rights of personnel, every effort will be made to guarantee that workplace monitoring is done in an ethical and respectful manner.

Covering, tampering with, disabling, or destroying Pafford EMS's monitoring equipment is a violation of policy which may lead to termination of employment or other services and will be reported to the appropriate legal authorities.

Inclement Weather

Purpose:

To ensure adequate emergency response 24 hours a day, 7 days a week, 365 days a year, regardless of weather conditions.

Policy:

Pafford EMS requires all personnel to report for their scheduled shift no matter what the weather conditions.

Procedure:

I. Standards.

- A. As a public safety service organization, Pafford EMS is committed to providing continuous and quality service to our community at all times.
- B. Unfortunately, weather conditions (snow or ice) or natural disasters (earthquake or hurricane) can make the commute to work difficult and time consuming.
- C. Unless otherwise notified, all personnel are expected to report to work regardless of the weather conditions, and Pafford EMS will attempt to operate under our normal work schedules in all weather conditions.
- D. During inclement weather, personnel should plan ahead and allow sufficient time for a safe trip to work.
- E. Standard call-off procedures and use of Vacation, Sick, or Personal Time will apply in situations where weather affects the ability to get to work. In times of serious weather conditions, at the discretion of management, these requirements may be relaxed, and on-duty employees may be required to remain on duty until replacements can safely arrive at work.

Issuance and Use of Company Equipment

Purpose:

To provide a safe and effective work environment with equipment that remains in good working condition.

Policy:

Pafford EMS will not tolerate misuse or misappropriation of Company equipment. Respect for Company equipment is expected at all times.

Procedure:

I. Pafford EMS Property.

- A. Any Pafford EMS property issued to personnel, such as keys, radios, mobile devices, tablets, computers, laptops, gas cards, or uniforms, and Company credit cards, where applicable, must be returned prior to the employee's final day of employment. Pafford EMS will institute legal proceedings where necessary to recoup such property or its replacement value.
- B. Personnel may be responsible for paying for any lost or damaged items, as well as for any unreturned items at the time of separation from service. "Damaged items" are items damaged beyond what would be expected with normal "wear and tear."
- C. With the exception of keys, pagers, and uniforms, no item purchased or supplied by Pafford EMS shall be removed from the premises, other than for authorized work purposes, without express written authorization of a supervisor. Further:
 - 1. All personnel may be subject to random searches as they leave Pafford EMS premises, in accordance with the "Workplace Search" Policy.
 - 2. Personnel found possessing any Pafford EMS property without express written authorization may be subject to discipline, up to and including termination.
- D. It is the responsibility of all personnel to understand the equipment needed to perform their duties. All personnel must remember that:
 - 1. Good care of any equipment used during the course of employment/membership, as well as the conservative use of supplies, will benefit Pafford EMS.
 - 2. If equipment is not working properly or in any way appears unsafe, or damaged, personnel are to notify a supervisor immediately so that repairs or adjustments may be made.

3. Any knowledge of misuse or damage to Pafford EMS property shall be promptly reported to a supervisor.
- E. Personnel of Pafford EMS work with delicate and expensive equipment. Care must be taken in handling and using such equipment. Personnel will be held responsible for damage to equipment caused by carelessness, misuse, or neglect, will be responsible for reimbursement for replacement or repair costs in those circumstances, and could be subject to discipline.

II. Controlled Substances and Pharmaceuticals.

- A. Pafford EMS has in its control and has general access to controlled substances, narcotics, and various other drugs that are carried in the ambulances and administered under appropriate circumstances by approved and certified personnel.
- B. Under no circumstances shall personnel take from Pafford EMS, misappropriate, or otherwise distribute, steal, sell, or inappropriately administer (to self or others) these controlled substances.
- C. Persons found in violation of this provision will be subject to immediate discipline, up to and including termination and may be reported to the proper authorities. Additional penalties may include discipline by the state regulatory agency including loss of certification and money penalties.

III. Pafford EMS Equipment.

- A. Personnel must treat all equipment, including vehicles, tools, devices, and other items in ambulances and in the station, with respect and care.
- B. Equipment shall only be used for its intended purpose.
- C. “Clowning around” or horseplay with equipment will not be tolerated.
- D. Misuse and wasting of equipment and supplies will not be tolerated.
- E. Personnel shall ensure that ambulances are properly stocked, that equipment is in working order, and that supplies are checked at the beginning of each shift and used supplies are replaced at the conclusion of each shift, and at the conclusion of each call if practical.

Return of Company Property

Personnel are responsible for all Pafford EMS property, materials, or written information issued to them or in their possession or control. Personnel must return all Pafford EMS property immediately upon request or upon termination of employment or services. Pafford EMS may take all action deemed appropriate to recover or protect its property.

Lockers

Purpose:

To regulate the use of Company owned lockers for the safety of personnel and to prevent contraband and dangerous materials from entering the workplace.

Policy:

Pafford EMS may provide lockers for use by personnel under certain conditions, but those lockers may be subject to search to ensure the safety of everyone.

Procedure:

I. Standards.

- A. Lockers may be provided to those personnel who make a request for a locker.
- B. Personnel may use only Company-provided locks for lockers. Non-Company-issued locks may be removed by Pafford EMS. Non-Company-issued locks may only be used with the express permission of Pafford EMS, and, in such cases, the person must provide a key or the lock combination to Pafford EMS.
- C. Lockers must be kept neat and clean. Additionally:
 - 1. Dirty cloths shall be removed for washing as soon as possible.
 - 2. Food should not be stored in lockers.
 - 3. Personnel may not hang pictures or other decorations on the inside or the outside of Company provided lockers.
- D. Pafford EMS reserves the right to inspect lockers without notice for any legitimate business related reason, including searching for contraband, alcohol, drugs, weapons, or Company property that may have been improperly obtained.
- E. Personnel are reminded that lockers are Company property and personnel shall have no expectation of privacy when it comes to locker use.

Patient Relations

Purpose: To maintain a positive image and maintain good standing with our patients and the community that we serve.

Policy: All personnel shall be positive ambassadors for the goodwill of Pafford EMS and treat others with respect and dignity at all times.

Procedure:

I. Standards.

- A. Personnel must act competently and deal with patients and their families in a professional, courteous, and respectful manner. The way we perform our individual jobs presents an image reflective of our entire organization.
- B. Personnel shall communicate pleasantly and respectfully with other personnel, patients, family members, vendors, health care associates and business partners at all times. Positive relations not only enhance the public's perception or image of Pafford EMS, but also pay off in loyalty and future service requests.
- C. Personnel are expected to follow-up on orders and questions promptly, provide professional replies to inquiries and requests, and perform all duties in an orderly manner. Serving the best interests and needs of all patients is our ultimate goal.
- D. Personnel should take great pride in the work they do, and to perform at the best level possible. Individual behavior and professionalism, as well as that presented by Pafford EMS, is important for all persons with whom we deal.

II. Patient Care.

- A. Personnel must treat all patients equally, with dignity and respect without regard to race, color, national origin, ancestry, religion, sex, age, disability, political belief, military service, or any other protected class.
- B. Personnel must provide patients, family members, and others with the highest degree of care they are certified to provide and as appropriate to the situation. At no time shall any personnel be expected to perform a service that he or she is not qualified to perform.
- C. Personnel shall follow all relevant patient care procedures. Following these standards help to assure that the highest level of patient care is provided.

III. Patient Requests and Complaints.

- A. Patient requests and complaints shall be handled in a professional and courteous manner. Nothing is more important than being courteous, friendly, helpful, and

prompt in the attention given to patients, since that is the way in which Pafford EMS will be judged.

- B. Patient requests for information should be handled in accordance with HIPAA release of information policies.
- C. Patient requests (or refusals) during care and/or transport shall be made in accordance with relevant patient care policies and applicable protocols.
- D. In all cases, HIPAA considerations must be evaluated. When possible, a supervisor or manager should be contacted, who should field the request or complaint. To the extent that a supervisor is not available, the staff member should record the information from the caller, and make sure that the appropriate personnel is notified (e.g. Compliance Officer, supervisor on duty, Human Resources personnel, etc.).
- E. Efforts should be made to make management aware of such a complaint as soon as possible, so that quick resolution may be made. Additional information on handling patient complaints can also be found as part of the “Conflict Resolution and Problem Solving” Policy.

IV. Patient Bill of Rights.

- A. In dealing with patients and in rendering care, all personnel are expected to respect the patient's rights, and to provide medical care and transportation at all times in accordance with certain rights. Failure to do so is a basis for discipline, up to and including dismissal.
- B. Patients have the following rights:
 - 1. To receive respectful care given by competent personnel.
 - 2. To receive every consideration of his or her privacy concerning medical care. Case discussion, examination and treatment are considered confidential and should be conducted as discretely as possible.
 - 3. To have access to and get copies of your health information and to have all records pertaining to medical care treated as confidential, except as otherwise provided by law.
 - 4. To receive quality care and high professional standards that are continually maintained and reviewed.
 - 5. To expect emergency procedures be implemented without delay.
 - 6. To refuse drugs, treatment, transport, or procedures offered to the extent permitted by law, and to be informed of the medical consequences of the refusal of any drugs, treatment, transport, or procedure.

7. To receive medically appropriate services without discrimination based upon race, color, national origin, ancestry, religion, sex, age, disability, political belief, military service, or any other protected class.
8. To receive appropriate pre-transport assessment, evaluation and treatment; careful handling, preparation, and monitoring of conditions, including thoughtful regard for those individuals associated with the patient; attention to all medical needs during transport; and a comfortable, safe ride to the acute care facility of their choice and/or the most medically appropriate facility.
9. To be served with state of the art, strictly maintained, and properly functioning emergency medical equipment, including the ambulance, litters, and portable equipment.
10. To receive professional, cheerful and attentive service throughout the course of the transport.

Privacy and Security of Patient Information

Purpose:

To remain in compliance with all state and federal laws designed to protect the privacy, confidentiality, and security of patient information.

Policy:

All personnel shall maintain the confidentiality of patient and other confidential information in accordance with applicable legal and ethical standards and all Pafford policies.

Procedure:

I. Background.

- A. Pafford EMS and its personnel are in possession of, and have access to, a broad variety of confidential, sensitive, and proprietary information. Inappropriate release of this information could be injurious to individuals, business associates, and Pafford EMS itself. All personnel have an obligation to actively protect and safeguard confidential, sensitive, and proprietary information in a manner designed to prevent the unauthorized disclosure of such information.
 - 1. All personnel have an obligation to conduct themselves in accordance with the Health Insurance Portability and Accountability Act (HIPAA) and the Health Information Technology for Economic and Clinical Health Act (“HITECH Act”), and Pafford EMS Policies that have been adopted to address patient confidentiality. Any questions concerning patient confidentiality should be directed to the Compliance Officer.
 - 2. There shall be periodic training on patient privacy issues and all personnel are expected to become familiar with all patient privacy policies in addition to those contained in the Handbook.

II. Privacy.

- A. Information pertaining to a patient’s medical situation may generally only be shared with other health care professionals involved with the treatment of the patient. Information may also be shared for other limited purposes, such as payment activities and health care operations, or other purposes specifically permitted by law, in accordance with Pafford EMS policies regarding the privacy of patient information.

III. Security.

- A. Much of the patient information that we collect is maintained on computers, and stored and transmitted electronically. In order to preserve the integrity of that data,

and protect the confidentiality and security of this patient information, personnel must follow all applicable computer use and data security policies set forth by Pafford EMS.

IV. Compliance Officer.

Pafford EMS has appointed a Compliance Officer who is responsible for overall privacy and security policies and protocols. If personnel have any questions about the use or release of any patient information, they should contact the Compliance Officer.

Release of Information to the Media

Purpose:

To prevent the inappropriate release of confidential patient information and other confidential Company information to the media, and to ensure a consistent approach to media relations.

Policy:

As a general rule, only designated personnel may contact and/or speak with the media or release information to members of the media on behalf of Pafford EMS. All personnel shall refer any media requests for information to the designated person within the organization to handle media requests.²

Procedure:

I. Standards.

- A. Personnel may from time to time, receive media inquiries from various news/media agencies, including:
 - 1. Newspapers and television stations, for reporting a rescue, accident response, fatality, or reporting on EMS activity, or “general coverage” of EMS.
 - 2. Magazines or periodicals, interviewing personnel related to incidents or general EMS issues of interest to the public.
- B. When contacted by the media, personnel must notify management with general information about the nature of the request and contact information for the reporter/writer. When contacted by the media, personnel shall refer the request to the Public Information Officer.
- C. All communication with the media on behalf of Pafford EMS must be approved by the Public Information Officer. When approved, personnel may discuss general topics of interest and ambulance and EMS related issues with the media. In talking with the media about non-patient or organization specific issues, all personnel should follow the following guidelines:
 - 1. Refrain from giving an “off the record” comment. Never consider any comment as “off the record.”

² Nothing in this Policy is intended to prevent and should not be interpreted in a way that would prevent employees from exercising their rights to discuss Pafford EMS’s wages, benefits, hours or other working conditions, or to affect any other rights under Section 7 of the National Labor Relations Act.

2. The following types of information should *never* be released:
 - a. Patient-specific information, including names, addresses, assessment of injuries, treatment provided, and history/diagnosis. As a covered entity, we are bound by HIPAA to preserve patient confidentiality. Release of patient-specific information to the media is not permitted.
 - b. Information that may be prejudicial to law enforcement investigations (e.g., “I think the driver that caused the accident was drinking alcohol”).
 - c. Information that is not known for certain such as subjective or the person’s “opinion” (e.g., “The car must have been speeding at the time of the accident”).
 - d. Information that may be an invasion of privacy, such as suicide information, AIDS status, overdose, psychiatric transport, cause of death.
 3. Personnel are encouraged to respond to requests for media interviews to discuss their job, their role as an EMT, and their experiences at Pafford EMS. As long as patient information is not discussed, the name of Pafford EMS is not disparaged, and confidential business information is not released, such interviews are permissible.
 4. In any situation where an interview becomes uncomfortable, personnel are free to stop it at any time. They are not required to talk to members of the media. Personnel are also free to completely refrain from speaking to the media about any topic.
- D. We must balance providing the public with information about the services we provide against the individual rights of the patient to keep their medical information confidential. We fully respect the right of the public to know about our activities as we are an agency subject to public scrutiny. But we can provide information to the public only to the extent that the law allows us.
- E. Personnel must refer all media inquiries to the Public Information Officer. Doing so helps assure that appropriate information is released and our public image is maintained.

II. Specific Standards for Dealing with Media Requests for Patient Information.

- A. General information about a response may be released, provided that patient identifying information is not offered. For example, acceptable releases include:
1. Name of hospital. Personnel may provide the name of the hospital to which patients have been transported. (Acceptable Example: The media calls about “the accident at Third and Main earlier this afternoon.” Personnel may inform the media “a patient was transported from the accident scene to County General Hospital.”). *The name of the patient should NOT be released to the media.* It is not appropriate for us to confirm or deny the identity of a patient. Requests for patient identity should be directed to a law enforcement agency or to the hospital. Law enforcement agencies are not subject to the strict requirements of protecting patient information as we are under HIPAA.
 2. Number of patients. Personnel may provide the total number of patients involved in an accident or transported to a facility. Personnel may not indicate specifics about the vehicle a patient was driving or which patient went to a particular facility. (Acceptable Example: Personnel may inform the media that “four patients were transported from the fire at the XYZ Chemical Factory. Two were taken to County General Hospital and two were taken to the Regional Medical Center.”)
 3. Age & Gender. Personnel may provide the age of a patient and the gender of the patient, unless it could reasonably be used to identify the patient. (Acceptable Example: Personnel may inform the media “a 39 y/o male was transported from the accident on the Interstate.” Personnel should not disclose to the media “a 39 y/o male was transported from 124 Main St.” since this information can be used to determine the identity of the patient.)
 4. Designation of crew members. The designation of crew members as paramedics or EMTs is not protected health information. Personnel may state, for example, that one paramedic and two EMTs were involved in caring for the patients involved in a motor vehicle accident. Personnel are not permitted to describe the specific type of care rendered to patients at the scene or on the way to the hospital. Nor may personnel speculate on what injuries a patient may or may not have sustained. (Acceptable Example: “Personnel on the scene of the incident included two paramedics and a supervisor and advanced life support was administered.”)
 5. Type of Transport. Personnel may state that a particular call was an emergency and that transportation was facilitated by ambulance or helicopter. Personnel may not speculate on the patient’s condition even if personnel are sure of that condition. (Acceptable Example: “Of the 3 patients on the scene of the incident, one was transported by helicopter to

the REGIONAL ONE Trauma Center and two were transported as non-emergency patients to the local hospital emergency department.”)

6. Non-PHI. Information that is not classified as PHI may be released to the media consistent with this Policy and state law. For instance, information about a fire response or a standby that did not involve patient care may be released to the media, as may general information about an event. (Acceptable Example: “We treated 45 patients during the two-day festival, and 6 were transported to local hospitals for various heat-related complaints”).
 7. Disclosures Authorized by the Patient. In the event that the patient or the patient’s legally responsible decision maker signs a HIPAA authorization form, disclosures of information, including PHI, may be made so long as they are done in accordance with the express terms of the written authorization. Authorization forms for this purpose must be HIPAA-compliant and must be approved by the Compliance Officer.
- B. If at any time personnel are unclear about whether information may be disclosed to the media, they are to always err on the side of caution and not disclose.

Non-Disclosure

The protection of confidential business information and trade secrets is vital to the interests and the success of Pafford EMS. Such confidential information includes, but is not limited to, the following examples:

- ❖ Computer processes
- ❖ Computer programs and codes
- ❖ Customer/Patient lists
- ❖ Financial information
- ❖ Pricing Information
- ❖ Business/Personnel strategies
- ❖ Pending projects and proposals
- ❖ Research and development strategies
- ❖ Scientific data
- ❖ Patient protected health information

All personnel may be required to sign a Non-Disclosure Agreement as a condition of employment/membership. Personnel who are suspected of improperly using or disclosing trade secrets or confidential business information will be placed on immediate suspension from employment/membership pending the outcome of an investigation. If the investigation reveals that the employee/member may have improperly used or disclosed trade secrets or confidential business information, such employee/member shall be permanently suspended from employment/membership in the organization and shall be subject to termination.

Nothing in this Policy is intended to prohibit disclosures of information where such disclosure is protected or required by law.

Whistleblower Policy

General:

Pafford EMS requires members of management and all other personnel to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. We must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility:

It is the responsibility of all members of management and other personnel to report ethics violations or suspected violations of the law in accordance with this Whistleblower Policy.

No Retaliation:

No member of management or other personnel who in good faith reports an ethics violation shall suffer harassment, retaliation or adverse employment or other consequence. Any personnel who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or removal from services. This Whistleblower Policy is intended to encourage and enable personnel to raise serious concerns within the Pafford EMS prior to seeking resolution outside the Pafford EMS.

Reporting Violations:

Pafford EMS has an open-door policy and suggests that personnel share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, a supervisor is in the best position to address an area of concern. However, if the personnel member is not comfortable speaking with his/her supervisor or is not satisfied with the supervisor's response, he/she is encouraged to speak with any member of management with whom he/she is comfortable in approaching.

Supervisors and members of management are required to report suspected ethics violations to Pafford EMS's Compliance Officer, which has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when one is not satisfied, or uncomfortable with following the Pafford EMS's open door policy, individuals should contact Pafford EMS's President directly.

Compliance Officer:

Pafford EMS's Compliance Officer is responsible for investigating all reported complaints and allegations concerning violations and, at his/her discretion, shall advise the President and/or the Senior Leadership Team. The Compliance Officer is required to report to the Senior Leadership Team at least annually on compliance activity.

Acting in Good Faith:

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. 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.

Confidentiality:

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Personnel should recognize, however, that submitting a complaint anonymously can often impair full and effective investigation of the matter. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations:

The Compliance 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.

Document Retention and Destruction Policy

Purpose:

This Policy establishes Pafford EMS's policy for identifying, retaining, storing, protection and disposing of certain records.

Policy:

I. Standards.

- A. It is the policy of Pafford EMS to maintain complete, accurate and high quality records. Records are to be retained for the period of their immediate use, unless longer retention is required for historical reference, contractual or legal requirements, or for other purposes as set forth by this Policy.
- B. Records that are no longer required, or have satisfied their required periods of retention, are to be destroyed in accordance with this Policy. Records are to be screened annually to determine if they are active or inactive.
- C. All personnel are responsible for ensuring that accurate and complete records are identified, retained, stored, protected and subsequently destroyed within their area of assigned responsibility in accordance with this Policy and the retention periods outlined in this Policy.
- D. Generally, records related to a specific incident should be retained if a review, investigation, or legal proceeding is ongoing. Otherwise, all records should be destroyed on a periodic basis in compliance with this Policy unless state or federal laws/regulations are revised to require longer retention. The exception to this general Policy is that all program overview memoranda, reports and meeting minutes should be retained in order to maintain a record of the compliance program operations.
- E. Records will only be destroyed pursuant to a standard Policy developed by management in conjunction with legal counsel.
- F. Records will be kept secure and confidential to protect personnel and patient privacy rights, as well as Company proprietary information.

Procedures:

I. Standards.

- A. All records must be maintained in a secure area. (Any electronic database should be controlled via pass codes.)

- B. A log system will be utilized to document the following steps in the records management process:
- Identification, control and maintenance of records
 - Retrieval/return of records to and from storage
 - Destruction of records and deletion from storage
- C. Upon receipt of notice regarding the initiation of an investigation, the service of legal process, or threat of litigation, steps will be taken immediately to prevent the destruction of any relevant documents pending further notice that the investigation or litigation has concluded.
- D. Duplicate and multiple materials are to be eliminated. Whenever possible, the official record is the one to be retained. Official records should not contain personal notations, other than the author's signature.
- E. All computers/servers should be backed up daily and the back-up files should be stored as outlined in this Policy. All computers and servers should receive check-ups at least annually to verify the reliability of the system.
- F. The following table provides the minimum document retention requirements. Documents are not to be destroyed, until after the minimum period of time specified in the table below has elapsed.

Adequate and Accurate Documentation Policy

Purpose:

All financial, accounting and claims data included in any report will be based on auditable, verifiable, and adequate documentation.

Policy:

All disclosure or release of financial information must be presented in a manner that: (1) does not contain an untrue statement of a material fact or omit to state a material fact; and (2) reconciles the financial information presented with the financial condition and results of operations of the business. In addition, all cost and financial data must be based on their financial and statistical records, which must be capable of verification by auditors (internal and external). The cost data must be based on an approved method of cost finding and on the accrual basis of accounting.

Procedures:

I. Standards.

- A. There is a prohibition on material misstatements or omissions in any data prepared by or on our behalf.
- B. There will be no presentation of financial, accounting or cost data that is misleading.
- C. All financial information presented will follow Generally Accepted Accounting Principles (GAAP).
- D. Adequate financial, accounting and cost data must be capable of being audited, be consistent with good business concepts, and be effective and efficient for management of the organization.
- E. Adequate cost information must be supportable in the records for reimbursement by Medicare. Data must be accurate and in sufficient detail to accomplish the purposes for which it is intended.
- F. All financial, accounting and cost data must be maintained in a consistent manner from one period to another.

Patient Care Reports

Purpose: This policy establishes Pafford EMS's requirements for completion and submission of Patient Care Reports (PCRs).

Policy: It is the policy of Pafford EMS that all PCRs are accurate and completed in a timely manner. Any PCRs found to be incomplete, inaccurate or untimely will be returned to the employee for completion.

Standards:

- A. PCR's are legal documents. This means that PCRs must be completed and maintained in an accurate and confidential manner.
- B. A PCR must be completed for every patient an employee encounters.
- C. Transport Refusals, Lift Assists, DOAs or similar incidents are **NOT** circumstances where an exception may be made to the PCR requirements. If an employee receives a run number, there must be a PCR to accompany.

Documentation and Penalties:

- A. Employees who fail habitually to complete PCRs fully, accurately, and/or in a timely manner will be subject to disciplinary action, up to and including termination.
- B. In general, Pafford EMS will observe the following disciplinary protocol pertaining to failure to comply with this Policy:

FIRST OFFENSE - Verbal Warning

SECOND OFFENSE - Written Warning

THIRD OFFENSE - Suspension

FOURTH OFFENSE - Termination of Employment

Reimbursement

Purpose:

To assist personnel, by covering the cost of certain work related expenses, including uniforms and educational classes.

Policy:

Pafford EMS may reimburse personnel for certain organization or work-related expenses, and training expenses, in accordance with this Policy.

Procedure:

I. Standards.

- A. Generally, Pafford EMS will reimburse staff members for reasonable, work-related expenses as pre-approved by management. All requests for advance approval and for reimbursement shall be submitted to your manager.
 - 1. Where the item(s) have already been purchased, a request for reimbursement must be accompanied by a receipt clearly indicating the item(s) purchased, the price, and the name of the vendor.
 - 2. Where possible, requests for reimbursement shall be submitted prior to any purchase, in which case a Purchase Order (PO) will be completed (if applicable).
- B. The following items are reimbursable to the extent not paid in advance by Pafford EMS:
 - 1. Uniforms.
 - 2. Personal Protective Equipment (PPE) not otherwise directly provided by Pafford EMS.
 - 3. EMS-related training courses and seminars Pafford EMS requires personnel to take.
 - 4. Courses to maintain certification of personnel (e.g., EMT, Paramedic, etc.).
 - 5. A single class or a course of study (e.g., to obtain a degree) taken to advance and increase knowledge, such as college-level degree programs or adult education courses, provided all of the following are met:
 - a. The person remains employed with Pafford EMS for 2 years following the course or course of study. Any person who leaves

employment within two years of completing (upon the receipt of a grade) a course or course of study shall not be reimbursed for the cost of the course of study.

- b. The person attains a grade of at least B in the course or course of study. If the person fails to obtain this grade, Pafford EMS will not provide reimbursement for the cost of the course.
- c. The person is in good standing with Pafford EMS, and the taking of the course or course of study does not adversely affect his or her ability to perform assigned duties.

C. Denial of Reimbursement.

- 1. Where the reimbursement request is denied, the person will be provided with the reason for the denial.
- 2. Reasons for denial of reimbursement include, but are not limited to:
 - a. The person has already met the maximum amount of reimbursement allowed.
 - b. The person seeks reimbursement of items that are not covered or approved in advance by management.

Scheduling

Purpose:

To ensure adequate emergency response and ambulance service 24 hours a day, 7 days a week, 365 days a year with the necessary complement of professional personnel.

Policy:

Pafford EMS requires personnel to arrive on time for their scheduled shift, or to provide for appropriate coverage when they may be unavailable to serve the assigned shift.

Procedure:

I. Standards.

- A. Pafford EMS reserves the right to schedule personnel at any time, or change the schedule in accordance with operational needs and demands.
- B. Pafford EMS will develop a staffing schedule. Work schedules may be changed from time to time at the discretion of Pafford EMS to meet operational demands, schedule changes, and personal conflicts that may arise among assigned staff. Attempts will be made to notify all personnel of any changes made to a posted schedule. To the greatest extent possible, Pafford EMS will attempt to maintain a flexible and fair schedule, and accommodate requests of personnel.
- C. It is the responsibility of personnel to arrive for and complete in full their scheduled shift, unless:
 - 1. A pre-approved request for time off has occurred:
 - a. All requests for time off shall be made as soon as reasonably possible, preferably prior to the development of the schedule.
 - b. When a conflict in the schedule is noticed, and a scheduled person requires time off, the supervisor must be contacted immediately in order to coordinate adequate coverage.
 - 2. The scheduled person has arranged for coverage with another person in accordance with the Trading Shifts and Maintaining Operational Coverage Policy.
- D. Because all personnel must be alert and able to perform their job at all times, in order to provide the best possible care to patients, all personnel are expected to report to their scheduled shift well rested, and ready to perform their duties. Personnel that are not well rested, or are physically unable to perform their duties as a result of exhaustion may be sent home, or may be temporarily be removed from

duty, and in some cases, may be subject to corrective action. For additional information concerning the obligation to report to duty well rested, please see the “Reporting to Work Well Rested” Policy.

- E. From time to time, personnel may be required to arrive for a shift early, or remain late after a shift for coverage purposes. It is requested that staff members remain at their post until their replacement crew has arrived and is prepared for duty. In all situations, the replacement crew is intended to mean personnel with equivalent credentials (*e.g.*, Paramedic for Paramedic, dispatcher for dispatcher, and driver for driver). This is done to make sure that there is available coverage for calls that may come in at all times. For employees, such additional time worked may qualify for overtime compensation. For additional information on overtime, please consult the “Overtime” Policy.
- F. To create a fair work schedule, personnel will be assigned weekend coverage on a rotating basis, unless persons specifically volunteer for weekend time (*e.g.*, part time employees, who may generally request these shifts based upon their other jobs). The weekend schedule will be from Friday at 3:00 p.m. through Monday at 7:00 a.m. Trading shifts is permitted as discussed above, to the extent that it does not pose problems or cause unnecessary overtime.
- G. Part-time staff employees with other jobs will be placed on the schedule in accordance with their other job requirements. All personnel with other jobs must provide a work schedule to their supervisor so that their work schedule at Pafford EMS can accommodate their other work schedule.
- H. Because of the 24-hour nature of this business, personnel may be scheduled to work at any time of the day, and that may vary from week to week. Personnel are asked to cooperate with their assigned schedule. Unauthorized leave from a scheduled shift or failure to follow their scheduled work hours will result in appropriate discipline.

On Call

Purpose:

In order to maintain adequate staffing 24 hours a day, seven days a week, 365 days a year, Pafford EMS may need to keep personnel available to report to work on an immediate basis.

Policy:

To keep certain personnel on call to ensure staff availability, staff members may be scheduled to be “on call” to support existing on-duty staff and must follow specific rules while on call.

Procedure:

I. Expectations of On-Call Personnel.

- A. “On call” means that personnel must respond to the station or other assigned destination within 20 minutes of being notified. Personnel, depending upon the schedule, may be assigned to cover a full shift “on call,” and must respond to the station when notified during that time period.
- B. The on-call schedule will be posted in accordance with the Scheduling Policy, and desired changes to the on-call schedule shall be made in accordance with the Scheduling Policy.
- C. While on call, personnel are permitted to move about the community to conduct personal business but must remain in a position to respond to the station or assigned destination within 20 minutes of being notified by a supervisor.
- D. Consumption of alcohol while on call is prohibited.
- E. A staff member is not required to remain at the station or at his or her residence while on call, but if an employee elects to stay at the station while on call, a decision which is totally voluntary, the on-call time spent at the station will not be considered hours worked.

II. Compensation While on Call.

- A. Employees shall receive an on call rate of \$50 per shift while on call.
- B. Employees are not required to remain at the station, and are free to participate in personal activities within the community, as long as they are able to hear/receive a text/telephone call and be in a position to respond to the station within 20 minutes of the notification.
- C. Once activated, the employee will be paid at his or her usual rate, for the hours actually worked. Compensable time begins at the time of activation and continues

until the time that the call ends. The call ends when all call activities are completed (i.e., the trip sheet is completed, the vehicle is replenished, etc.).

- D. The on-call pay will be included in calculating the “regular rate” for overtime purposes. However, except where performing duties following a call, on call time will not be counted as “hours worked” for determining overtime eligibility.

III. Rules of Conduct While on Call.

A. Personnel shall:

1. Keep their cell phones on at all times during the on-call shift.
2. Respond to the station within 20 minutes of being notified.
3. Respond in appropriate uniform.
4. Obey all traffic laws when responding to a call to duty.
5. Contact a supervisor if the above guidelines cannot be followed.
6. Accurately document both on-call hours as well actual hours worked (responding to a call) while on call.

B. Personnel shall not:

1. Consume alcoholic beverages while on call.
2. Engage in activities that would create problems with being called for duty (An example of this would be going into a movie theater that is known to have spotty pager coverage).
3. Enter a location that would limit radio contact, or prevent response to the station within 20 minutes of being notified.

Outside Employment/Volunteering

Purpose:

To prevent conflicts of interest, maintain a high level of patient care, and help ensure that the focus of an employee's work is with Pafford EMS.

Policy:

Any outside employment or volunteer service must be reported to management. At all times, any outside employment or volunteer activities with another agency cannot interfere with position responsibilities at Pafford EMS.

Procedure:

I. Standards.

- A. Any employee engaged in or contemplating outside employment or volunteer service must divulge the relationship, or contemplated relationship, to his or her supervisor.
 - 1. Employees are expected to devote full efforts to their employment with Pafford EMS (whether full or part time).
 - 2. Pafford EMS will work with personnel to coordinate second jobs that are necessary out of need and/or desire.
- B. Requests for outside employment or to engage in volunteer service shall be reviewed, and will generally be approved, when the outside employment or volunteer service:
 - 1. Does not conflict with employee's Pafford EMS responsibilities, including the ability to work overtime as required in the staff member's position. Specifically:
 - a. Any outside employment or volunteer service shall not take precedence over Pafford EMS employment.
 - b. Employees are not permitted to arrive late or leave early, to meet obligations with any outside employment or volunteer service.
 - c. Any outside employment or volunteering on behalf of a competitor or service that regularly does business with Pafford EMS may be disallowed, in accordance with the Conflicts of Interest Policy.

2. Does not interfere with duties and expectations. Specifically:
 - a. Outside employment or volunteer service that affects the ability to perform position functions (including the requirements that employees arrive for work well rested) will be denied.
 - b. Part-time Pafford EMS employees are more likely to be granted a request to have outside employment or provide volunteer service since it will generally have less of an impact on the schedule than granting such request of a full-time employee. This will generally be permitted as long as the employment or volunteer service is not detrimental to the interests of Pafford EMS.
- C. Personnel who are granted a request to work outside employment or provide volunteer service may be asked to cease the outside employment or volunteer service, or make schedule changes, if the outside employment or volunteer service interferes with their ability to complete position duties with Pafford EMS.
- D. Personnel who are denied a request to have outside employment or provide volunteer service, yet engage in such, will need to choose between the outside employment or volunteer service and employment with Pafford EMS.
- E. To the extent that the outside employment or volunteer service is a home-activity or other activity that can be conducted by phone or computer, under no circumstances shall an employee be permitted to conduct such outside employment or volunteer service while on work-time with Pafford EMS.

Being Well Rested At Work

Purpose:

To maintain high levels of quality patient care by ensuring that personnel are not overworked and are able to function effectively.

Policy:

Pafford EMS requires that all employees report to duty well rested, and able to meet the needs of the public and patients that we serve not just at the start of the shift, but throughout the entire shift.

Procedure:

I. Standards.

- A. Because we provide emergency patient care, keen judgment, skill, and safe performance of position duties are required at all times. To do this, all personnel must report to work well-rested at the start of his or her scheduled shift and maintain being well rested throughout the entire shift.
- B. Employees who feel that they are fatigued or sleep-deprived such that they have concerns that they are physically incapable of safely performing their job duties must report such concerns to their supervisor immediately. Any employee who reports this to their supervisor will not face any adverse employment action or retaliation for making such a report, unless it becomes habitual.
- C. Employees who have concerns about other employees being fatigued or sleep-deprived are similarly encouraged to report such concerns to their supervisor immediately. Neither the employee reporting nor the employee being reported (who cooperates in any corrective action) will face any adverse employment action or retaliation for making such a report.
- D. Any time a member of management feels that an employee is sleep-deprived or fatigued and may not be able to safely perform his or her job duties is authorized to take appropriate corrective action. Corrective action may include utilizing any time out or rest protocols of Pafford EMS or other actions as warranted by the circumstances.
- E. In addition to other employment, personnel are asked to schedule other personal outside activities appropriately, so as to be well rested and alert when reporting for duty and throughout their entire shift.
- F. Insufficient rest and other symptoms of exhaustion can affect the ability to perform job duties, and jeopardize the well-being of patients and co-workers. In the interest of maintaining a safe work environment, and our commitment to the highest level of patient care, we expect everyone's cooperation with this Policy.

- G. A staff member who routinely arrives to work not well rested, or who shows signs of exhaustion such that patient care may be jeopardized may also face appropriate disciplinary action.

Uniform Dress Code & Personal Appearance

Purpose:

To maintain a professional appearance at all times within the community, projecting a positive image to the public.

Policy:

Pafford EMS requires all personnel to meet appropriate dress code and uniform standards for the respective position of the staff member.

Procedure:

I. General standards of appearance.

- A. Pins, jewelry, hats, name/insignia or other identifying symbols which are not professionally related to authorized uniforms are prohibited from being worn.
- B. Any tattoos which others may reasonably deem to be inappropriate or offensive shall be covered at all times while personnel are on duty with Pafford EMS. Any other tattoos should be covered wherever possible.
- C. Hair (including facial hair) is to be neat and groomed at all times. If an employee has long hair, then that person must arrange it in such a way that it does not present a safety hazard or distract from duties. Mustaches and beards must be clean, well-trimmed, and neat, and must not interfere with the wearing of any safety or medical device, including personal protective equipment (PPE).
- D. Perfume, cologne, aftershave, scented lotion, etc., should be used in moderation or avoided altogether. Jewelry should not be excessive and should be limited to items that do not functionally restrict the employee or create a danger to personnel or others. Facial jewelry, such as eyebrow rings, nose rings, lip rings and tongue studs, is not permitted to be worn during working hours or while on duty.
- E. Personnel are expected to arrive to work in a clean, presentable manner with all appropriate uniform attire in place.

II. Uniform(s).

- A. Pafford EMS will provide a full set of uniforms (or reimburse for the cost) to all full and part-time personnel. Additional uniforms may be purchased through Pafford EMS's Uniform store or through Human Resources to be payroll deducted.
- B. Only the standard Pafford EMS uniform shall be worn while on duty.

- C. Uniforms must remain clean, unwrinkled, neat, and in good repair. Uniforms items that are faded, torn, or worn to a state of significant deterioration are not acceptable.
- D. Pager, radio, or Company-issued phone is considered a part of the uniform and must be worn appropriately.
- E. All personnel are responsible for the care and maintenance of their uniforms. If your uniform becomes soiled during a shift, it shall be changed, if at all possible.

Personnel shall not wear their uniform when not on duty, except that personnel who are on call may wear their uniform during on call time.

Pafford EMS will replace uniforms that are contaminated or damaged in the line of duty.

Visitors

Purpose:

To prevent possible harm, maintain patient confidentiality, and prevent distraction of personnel while on duty that may occur with personal visits.

Policy:

Visitors in the workplace shall be restricted to specified areas and may be limited in the time of their visit.

Procedure:

I. Standards.

- A. While visitors are not prohibited within the station, we ask that visits from visitors (*i.e.*, non-members and non-employees) be limited to 30 minutes or less. Visitors are not permitted after 11:00 pm and must leave the facility if the employee leaves.
- B. When a visitor comes to the building, the visitor must be met in the lobby, other public area near the entrance to the station, or (when possible) outside. This is to prevent unnecessary visitor access to areas of the station that may house patient information and to prevent possible injury. A staff member must remain with the visitor at all times during the visit.
- C. Visitors are not permitted in areas where patient information is stored or may easily be viewed or in other areas that could negatively impact operations.
- D. If a Pafford EMS station or company location is located within a third party facility, all visitors must adhere to that facility's visitor policy.

Workplace Searches

Purpose:

To safeguard the property of all personnel, and prevent possession, use and sale of illegal drugs and other dangerous things in the workplace.

Policy:

Pafford EMS may conduct random or reasonable suspicion searches of persons and their property while on, in or adjacent to Pafford EMS property in conformance with applicable laws.

Procedure:

I. Standards.

- A. Pafford EMS reserves the right to question any person as well as inspect packages, handbags, backpacks, duffle bags, briefcases, lunchboxes, or other packages, possessions, articles of clothing, or items entering or exiting Pafford EMS property.
- B. All personnel are expected to comply with a search request. Pafford EMS will initiate a search only when absolutely necessary.
- C. Pafford EMS also reserves the right to search the desk, office, locker, or other assigned space of any personnel, at any time, whether or not the staff member is present, since such areas remain the property of Pafford EMS.
- D. Searches are conducted to discover weapons, drugs, contraband and/or improperly obtained Company property (or any other property not belonging to that staff member), and may be done randomly, at the discretion of management based upon a complaint or suspicion, or in conjunction with local law enforcement officials.

II. Violations.

- A. Any visitor who refuses to consent to a search when requested will be denied access to the building.
- B. Any personnel who refuses to consent to a search, or who is found to possess an item that is prohibited by these policies or by law, will be subject to disciplinary action, up to and including termination. That individual may also be reported to the proper authorities.

Workplace Violence

Purpose:

To help prevent incidents of violence from occurring in the workplace, and to further ensure as safe a workplace as possible.

Policy:

Pafford EMS forbids acts or threats of violence by any staff member against any other person, customer, visitor, or patient in or about Pafford EMS vehicles and buildings, or on Pafford EMS premises at any time.

Procedure:

I. Background.

- A. Pafford EMS expects all of its personnel to conduct themselves in a professional and courteous manner at all times. All staff should treat others in a manner that they would want to be treated.
- B. Any behavior that a reasonable person would construe as indicating a potential for violence is strictly prohibited. Examples of improper behavior include, but are not limited to: shouting at others in an aggressive or threatening manner, swearing at others, making threatening gestures towards others, throwing or tossing things in a threatening or aggressive manner, slamming down equipment with the intent to startle another person, pounding or punching a wall, purposely breaking things, etc.

II. Prevention of Workplace Violence.

- A. In keeping with the spirit and intent of this Policy, Pafford EMS shall strive to:
 - 1. Provide as safe a work environment as possible.
 - 2. Take prompt remedial action against any personnel who engage in any threatening behavior or acts of violence or who use any obscene, abusive, or threatening language or gestures.
 - 3. Take appropriate action when dealing with customers, former personnel, or visitors who engage in such behavior. Such action may include notifying the police or other law enforcement personnel.
 - 4. Establish viable security measures to ensure that facilities are safe and secure to the maximum extent possible and to properly handle access to Company facilities by the public, off-duty personnel, and former personnel.
- B. In keeping with the spirit and intent of this Policy, personnel shall:

1. Notify management of any suspicious workplace activity or situations or incidents that they observe or that they are aware of that involve other personnel, former personnel, customers, or visitors and that appear problematic. This includes, for example:
 - a. Threats or acts of violence.
 - b. Aggressive behavior.
 - c. Offensive acts.
 - d. Offensive comments or remarks.
2. Not participate in any form of retaliation against other personnel for making a good faith report under this Policy.

Firearms, Weapons & Explosives

Purpose:

To maintain a safe working environment by prohibiting dangerous weapons and devices in the workplace.

Policy:

Personnel are prohibited from carrying firearms, weapons, explosives or other dangerous devices while on duty, or bringing such items to the workplace, except with respect to bringing firearms into parking areas as set forth below.

Procedure:

I. Definitions.

- A. For purposes of this policy, “weapons” include both offensive and defensive weapons, including but not limited to, pepper spray/mace, firearms and explosives including fireworks, TASER/stun gun, black jack, or any night stick.

II. Standards.

- A. This Policy does not apply to law enforcement officers who are serving in an authorized law enforcement capacity.
- B. This Policy does not apply to legitimate Pafford EMS equipment and supplies that may have dangerous potential (e.g., rescue knives, needles), or may have explosive tendencies (e.g., compressed gasses).
- C. All weapons are prohibited from being on Pafford EMS property, including lockers, personal backpacks or other carrying cases while on Company property, and in Company vehicles. This prohibition does not apply to personnel’s lawful possession of a firearm in a locked, privately owned motor vehicle in the Company parking lot or other designated parking area. Any such lawfully possessed firearm must remain hidden from plain view and within a locked case or container within the vehicle. In areas where firearms are otherwise prohibited by state or federal law, all weapons, including those in privately owned vehicles, remain prohibited.
- D. Personnel having any questions or concerns about what may constitute a prohibited weapon under this Policy should immediately consult their supervisors.

Smoking and Tobacco Use

Purpose:

To maintain a healthy, clean, and safe environment for all personnel, patients, and visitors.

Policy:

The use of tobacco containing products is prohibited in all Pafford EMS buildings, and vehicles.

Procedure:

I. Standards.

- A. Personnel are prohibited from using tobacco products and e-cigarettes in all vehicles (both passenger compartment and driver compartment) and buildings of Pafford EMS. For purposes of this Policy, “tobacco products” includes but is not necessarily limited to cigarettes, cigars, and smokeless tobacco products, such as chewing tobacco.
- B. Personnel are not permitted to use tobacco products and e-cigarettes while on the scene of an emergency response.
- C. Personnel are permitted to use tobacco products and e-cigarettes in hospital areas which have been designated as smoking areas.
- D. Personnel are permitted to use tobacco products and e-cigarettes outside of Pafford EMS buildings.
- E. The above standards shall apply to visitors and patients as well as personnel.

II. Disposal of Tobacco Products and e-Cigarettes.

- A. All cigarette butts will be placed in the designated receptacles in the smoking area. Cigarette butts should not be discarded on the ground or in any trash bins.
- B. Smokeless tobacco residue will be deposited in the appropriate receptacle or spittoon. There shall be no spitting of tobacco juice on Company property, including in sinks or toilets.

Testifying in Court & Depositions

Purpose:

To uphold the requirements of the law, to support civic duty and protect employees from wage loss when called upon to appear in court for Company related business.

Policy:

Personnel are expected to testify about work related matters, when properly subpoenaed to do so, in an honest and truthful manner. Career personnel testifying regarding work related matters when required shall receive compensation for time spent in providing such testimony. Personnel engaged in court testimony for personal matters will not be paid, and may use personal or vacation time to handle such matters.

Procedure:

I. Standards.

- A. At times, personnel may be required to testify in court, for incidents that relate to Pafford EMS, or personal matters, unrelated to Pafford EMS. In accordance with the “Scheduling” Policy, appropriate provisions for coverage must be made when testimony conflicts with a scheduled assignment.
- B. Career personnel who are subpoenaed and must appear for a hearing, deposition, or court appearance because of an action performed or witnessed while in the course of duty or related to work will be paid a regular hourly rate for the actual time required to provide such testimony.
- C. Personnel who must attend a hearing, deposition or court appearance for reasons other than for testimony related to the performance of job duties with Pafford EMS will have to request time off, on either a paid, or unpaid basis, depending upon accrued time off that may be available. In accordance with Company scheduling policies, appropriate provisions for coverage must be made when testimony conflicts with a scheduled work assignment.
- D. Personnel must submit to their supervisor a copy of the subpoena or other related court document to indicate the nature of the court appearance and let him or her know the reason for the presence at the hearing or deposition.
- E. Personnel are required to notify their supervisor if they are the subject of personal action by an individual or agency that has any business or patient relationship, affiliation or contact with Pafford EMS. This includes patients, customers, or operators of vehicles that may be involved in an accident with Pafford EMS vehicles, and the employees and staff of organization with whom we work. We will make every effort to respect and maintain the confidentiality of such information.

II. Reimbursement.

- A. All time spent on Company related court business or testimony should be accurately recorded and submitted to the person's supervisor.
- B. Pafford EMS will also provide reimbursement for reasonable travel expenses (including mileage and meals) when properly submitted with receipts where appropriate.

Section 3: Employee Policies – Career Personnel

Employment Classifications

Purpose:

To ensure proper classification of employees for pay and benefit purposes.

Policy:

Pafford EMS has defined full time, part time, and non-exempt and exempt positions within the organization.

Procedure:

I. Definitions.

- A. *Full-Time Employee:* An employee who is regularly scheduled to work at least 40 hours per week.
- B. *Part-Time Employee:* An employee who is regularly scheduled to work less than 30 hours a week. Part-time employees are not eligible for benefits unless stated otherwise. Part-time employees will not be guaranteed a minimum amount of hours per month, but are required to work a minimum of (3) 24hr shifts per quarter to maintain “part-time” status.
- C. *Exempt Employee:* A salaried employee who is not eligible for overtime compensation, because they are employed in a bona fide executive, administrative, or professional capacity and their duties and responsibilities allow them to be “exempt” from overtime pay provisions under the law.
- D. *Non-Exempt Employee:* An employee (including full-time, part-time and per diem) who is entitled to receive overtime compensation for hours worked in excess of 30 hours per week. This means that non-exempt employees are not exempt from (and therefore should receive) overtime pay if they work more than 40 hours in a work week.

II. Job Assignments.

- A. Regardless of job title or employment classification, all employees are expected to be available to participate in any job as needed, and where capable, and/or certified to perform such a job.
- B. It is each supervisor’s responsibility to assign available personnel to jobs based on the needs of Pafford EMS.

- C. Any employee who refuses reassignment to an area of greater need consistent with this Policy will be sent home, without pay, for the balance of the shift and will be subject to disciplinary action up to and including termination.
- D. Employees shall not be asked to perform tasks unrelated to their job description that require a higher level of responsibility or training, except in emergencies or other unusual, temporary circumstances.
- E. Employees may be called upon to perform work normally assigned to other staff members. We expect everyone's cooperation on these occasions.
- F. It may be necessary to work beyond a scheduled shift to complete an assignment or to meet an urgent situation.

Introductory Period

Purpose:

To ensure proper training of new personnel so that they are properly acclimated to the organization and to determine if the mutual relationship between Pafford EMS and the staff member should continue.

Policy:

All new hires of Pafford EMS will participate in a 6-month introductory period. The employee will be evaluated during this time, and at the end of the period a determination will be made as to whether the employment will continue. Nothing in this policy changes the at-will nature of the relationship following successful completion of the introductory period.

Procedure:

I. Standards.

- A. During the first six (6) months of employment, qualifications and abilities are carefully evaluated relative to work assignments and our environment. Supervisors will provide employees with information about standards and expectations that are required for each job. All employees are encouraged to ask questions and get clarifications of policies and expectations.
- B. During the initial Introductory Period, and any time thereafter, employment may be terminated at the option of either the employee or Pafford EMS.
- C. Employees will be evaluated at the conclusion of the Introductory Period, at which time all relevant training should be completed.
- D. During the Introductory Period, all employees are expected to become familiar with Pafford EMS policies, including those outlined in this Handbook.
- E. As circumstances warrant, the Introductory Period may be extended an additional 90 days.

Orientation Program

Purpose:

To help new employees become accustomed to Pafford EMS and how it operates, and to ensure that they have the opportunity to learn all relevant Policies and Procedures.

Policy:

Pafford EMS will provide initial orientation training and will monitor new staff member performances during the six-month Introductory Period.

Procedure:

I. Standards.

- A. The Orientation Program is designed to help all employees become familiar with essential operating procedures, patient care protocols, and policies of Pafford EMS, and runs concurrent with the Introductory Period.
- B. As part of the Orientation Program, all employees will receive information about the requirements of the position, compensation and benefits, policies, and other relevant information regarding both employment and patient care.
- C. During the Orientation Program, new employees are expected to attend all mandatory and other scheduled training sessions. Training sessions may include such topics as patient care, the organization's compliance program, the organization's drug and alcohol-free workplace, HIPAA and patient privacy and security, OSHA-related topics, legal compliance, and other relevant patient care and employment-related topics.
- D. Employees are encouraged to ask questions about their employment or the policies of Pafford EMS during any of the Orientation Programs. Even after the Orientation Program and Introductory Period ends, employees are encouraged to voice their concerns and pose questions to their supervisor or other members of management.
- E. For the first 90 days of the Orientation Program, employees may not be eligible for all employment benefits. There may be a waiting period to sign up for benefits like health care insurance. Please consult the individual benefit program for specific eligibility and elimination periods or contact the Human Resources Department for additional information.
- F. At the conclusion of the Orientation Program an employee will meet with their supervisor to determine if their employment will be continued beyond the Introductory Period. Successful completion of the Introductory Period and completion of all Orientation Program training does not guarantee permanent employment or alter in any way the at-will employment relationship.

Absenteeism & Tardiness

Purpose:

To ensure regular, timely attendance so adequate staffing is available at all times, in order to provide for the best possible service.

Policy:

Employees must report to work on time, and may not be absent from work unless absolutely necessary, and/or with supervisor approval.

Procedure:

I. Absence.

- A. Employees are to call in (at least 4 hours in advance, if possible) when they are going to be absent.
 - 1. We understand that sometimes absence will be a sudden event and adequate notification is impossible. In these instances, as soon as the employee knows that he or she will be absent, the employee is to notify Pafford EMS immediately.
 - 2. If an employee is absent due to an illness or injury for 2 or more consecutive work shifts, Pafford EMS may request written documentation from a doctor to verify that the employee was ill or injured and medically excused from work. Similar written documentation may be required to verify the employee is medically cleared to return to work after an absence for 2 consecutive work shifts.
- B. When an employee will be absent for consecutive shifts, the employee must call in each shift to ensure proper scheduling. Pafford EMS will never presume consecutive days of absence for sickness, and always expects each employee to arrive for work on time, unless otherwise notified in accordance with this Policy.
- C. Employees who do not call in to indicate that they will be absent for 2 consecutive work shifts will be considered to have voluntarily terminated employment.

II. Tardiness.

- A. Employees are to call in (at least 4 hours in advance, if possible) when they are going to be late.
- B. We understand that sometimes lateness will be a sudden event (traffic accident, child care issues, car troubles, etc.), and adequate notification is impossible. In

these instances, as soon as the employee knows that he or she will be late, the employee is to notify Pafford EMS immediately.

III. Documentation and Penalties.

- A. All absences and tardiness will be recorded in the employee's personnel file along with a record of any advance notice that was or was not provided. Except where absences are for reasons protected by law, such as under the FMLA, for example, attendance records will be considered when evaluating completion of the introductory period, requests for promotions and transfers, and as part of the annual review, in accordance with the Performance Feedback and Goal Setting Policy.
- B. An employee may be subject to discipline for any unexcused absence or tardiness.
- C. Nothing in this Policy is intended to interfere with employees' rights to take time off for reasons protected by federal or state law.

Wages, Pay Period, and Pay Procedures

Purpose:

To outline standard payment and pay related provisions and to ensure high quality of care, maintain integrity in the workplace and make certain that employees report to work and document the time worked.

Policy:

As an emergency response agency, it is essential that all employees report to work on time and that they record work time completely and honestly. Pafford EMS will use clear and consistent pay procedures which are fair to all employees and are in compliance with state and federal law.

Procedure:

I. Standards.

- A. All employees should have time recorded and be at their assigned workstations ready to respond at the start of their shift.
- B. All employees shall adhere to the terms of the Scheduling Policy as well as the Trading Shifts and Maintaining Operational Coverage Policy, including the provisions for calling off, and trading shifts with other employees.
- C. Due to the nature of our business, there are no designated meal breaks during the scheduled shift for staff. Staff persons are paid for the full work shift and are permitted to take meal breaks as the work volume permits. All operational staff must remain ready to respond during meal breaks.
- D. Staff persons are expected to work their full shift, as reported on the work schedule, unless provisions have been made and approved by a supervisor, or unless an emergency situation warrants an early departure. In all cases, changes to the schedule must be approved of by the employee's supervisor, and appropriate coverage must occur.

II. Definitions.

- A. For purposes of this Policy, "Operational Staff" means EMTs, Paramedics, and others actively engaged in patient care in the field.

III. Work Week.

- A. The designated "work week" for Pafford EMS for calculating overtime eligibility and other purposes is the seven consecutive days starting at 7:00 a.m. Sunday and ending at 6:59 a.m. the following Sunday morning.

- B. Because of our 24-hour operation, there is no standard work shift. Each employee may have a different work shift, with different days off, within the standard pay week that runs from 7:00 a.m. Sunday to 6:59 a.m. the following Sunday.

IV. Hours of Work.

- A. All employees will be assigned work shifts and are expected to work the shift periods assigned to them.

V. Recording Work Time.

- A. Employees are responsible for signing in and signing out when reporting for work or leaving work, for entering their time worked and for submitting it to their supervisor at the end of the pay period. It is critical that employees record all time which they have worked.
- B. Anyone found falsifying a time sheet or anyone completing another employee's time sheet or clocking in or out for another employee will be subject to discipline.
- C. Any employee who forgets to submit or sign their time sheets may experience a delay in receiving their paycheck. Completed or forgotten time sheets may be submitted the following pay period for processing.
- D. Pafford EMS may utilize mechanical or electronic time clock systems that may modify employee responsibilities under this Policy.

VI. Pay Day and Paychecks.

- A. The official pay day is the Friday following the end of the preceding two-week Sunday – Sunday pay period.
- B. Employees' pay will be deposited directly into a checking account of their choice.
- C. Employees should review their pay stubs for errors, and immediately report such errors.
- D. Any errors on the paycheck (e.g. overpayment or underpayment, inaccurate accounting of time or vacation time) will be corrected on the next paycheck.
- E. Employees that do not receive their paycheck in a timely manner after the date such check is to be issued must notify their supervisor of the delay immediately. If a paper check is issued and is lost or stolen, employees must notify Pafford EMS immediately, so that a new check may be issued once a stop payment is made. Pafford EMS will not be responsible for any lost or stolen checks, and if a stop payment order was unable to be made, Pafford EMS will not re-issue a check that has already been deposited.

- F. Employees who have questions about their pay, the calculation of their pay, or any deductions made from pay should contact the Payroll Department immediately. If an employee believes that his/her wages have been subject to any improper deductions, that the pay received does not accurately reflect all hours worked, or that any violation of this policy or the wage and hour laws has occurred, he or she should report concerns to the supervisor immediately. If the supervisor is unavailable or the employee believes it would be inappropriate to contact that person (or that person has not provided a prompt and satisfactory reply), the employee should immediately contact the Payroll Department. If still dissatisfied, the employee can contact the Human Resources Department.

Trading Shifts and Maintaining Operational Coverage

Purpose:

To ensure adequate coverage of all work shifts when employees trade shifts with each other.

Policy:

Pafford EMS will permit employees to trade assigned shifts in limited situations, and only when following the steps of this Policy.

Procedure:

I. Background.

- A. Pafford EMS recognizes that at times, personal conflicts may arise in which an employee cannot meet the obligations of his or her scheduled shift.
- B. Where such conflicts occur, employees may be able to trade or “swap” their shift with another employee as long as there is adequate coverage of the shift.

II. Standards.

- A. Any proposed trade must be presented to a supervisor. Any trading will be subject to the following:
 - 1. Equal trading shall occur. An employee shall not expect another employee to cover part or an entire shift without covering an equal amount of time for that other employee.
 - 2. A trade of straight time for overtime shall not occur. But:
 - a. Exceptions may be made in extraordinary circumstances where a “swap” cannot occur and overtime hours may be required (e.g., an emergency arises and coverage is required for the last shift of the week).
 - b. Such an exception will be made by the supervisor.
 - 3. Trades in coverage must be made between employees who are equally qualified and certified to work the shift. For example, a paramedic cannot trade with an EMT, since the EMT would not be qualified to meet the requirements of the paramedic’s job duties.

- B. Management reserves the right to refuse to permit a trade to the extent that it will pose scheduling or other personnel conflicts. All proposed trades must be submitted in writing and signed by both employees. All trade requests must be submitted to the appropriate supervisor at least 24 hours prior to the first shift involved.
- C. Trades are not permitted unless the employees involved receive the approval of the supervisor. Employees engaged in unauthorized trading may be subject to disciplinary action and may be prohibited from entering into any other trades for a period of time.

Overtime

Purpose:

To comply with state and federal laws concerning pay practices.

Policy:

Pafford EMS will pay non-exempt employees overtime if they work more than 40 hours in a work week.

Procedure:

I. Eligibility.

- A. All non-exempt employees can be eligible for overtime payments.
- B. Any and all work actually performed in excess of 40 hours in a week will be paid at a rate of one and one half times the employee's regular rate.
- C. Time spent on vacation, sick, holiday, or personal days will not count as hours worked, and will not be eligible in either calculating the number of hours worked in the week, or in making overtime payments.

II. Standards.

- A. Due to operational demands, emergencies, weather conditions, or other job requirements, overtime work may be required.
- B. Overtime hours beyond those scheduled in advance must receive the supervisor's prior authorization.
- C. All employees need to be willing to work and make accommodations as necessary in the interest of patient care and the needs of Pafford EMS, especially that of always having adequate coverage for its ambulances.
- D. Selection of an employee to work overtime will be made by a supervisor in a fair and equitable manner.
- E. Exempt salaried employees who also meet the duties established under the law for executive, administrative and professional employees are not eligible for overtime. Exempt employees are expected to work the number of hours necessary to complete their job. In some situations, Pafford EMS may permit salaried, exempt employees to accumulate "comp time" for some of the hours that may need to be worked beyond the regular 40-hour work week. An employee will be advised if his or her job position is an "exempt" (no overtime payments) or "non-exempt" (eligible for overtime payments) position.

- F. All hours worked must be properly documented to ensure proper payment calculation, including overtime, where applicable.

Wage Deductions

Purpose:

To comply with state and federal laws concerning deductions that may be made from an employee's paycheck.

Policy:

Pafford EMS will deduct from each paycheck only those amounts required by law or authorized by the employee.

Procedure:

I. Standards.

- A. All deductions as required by state, federal, or local law, or by court order (e.g., garnishment of wages), shall be made.
 - 1. The amount of the deductions will depend on earnings and on the information furnished on each W-4 form regarding the number of dependents and/or exemptions claimed.
 - 2. The W- 2 form received each year will indicate precisely how earnings were deducted for these purposes.
- B. Payroll deductions include, but are not limited to:
 - 1. Federal Withholding.
 - 2. FICA.
 - 3. State Income Tax.
 - 4. Local Wage Tax and/or Occupational Tax
 - 5. Retirement Savings.
 - 6. Correction of errors or obligations.
 - 7. Union Dues (if applicable).
 - 8. Miscellaneous Voluntary Deductions.
 - 9. Deductions required by law or court order.

10. Other deductions authorized in writing by the employee, including as examples uniform and health insurance deductions.
- C. For exempt employees, deductions for absences may be made from the employee's regular salary when authorized by federal or state law, including the Fair Labor Standards Act. Any employee who believes improper deductions have been made from their paycheck should contact the Payroll Department. immediately. It is the express intention of Pafford EMS to pay its employees for all time worked and for all wages to which they are entitled.

Garnishment of Wages

Purpose:

To comply with applicable law and any valid claim against an employee by garnishing wages when required.

Policy:

Pafford EMS will deduct and forward to appropriate persons any amount of an employee's wages that has been ordered to be garnished by a court or other appropriate authority.

Procedure:

I. Standards.

- A. Pafford EMS recognizes that routinely, a child support order, alimony payment, debt, or other legally valid claim against an employee's wages may exist.
- B. Where such a valid claim is received against the wages of a Pafford EMS employee, the subject employee will be notified about the amount and details of the garnishment or wage order.
- C. Pafford EMS is required by law to deduct the garnished amount from the employee's pay, and forward that amount to the party referenced in the order.
- D. Pafford EMS will never ignore an order, or fail to deduct a garnished amount, as long as the order remains in effect.
- E. Under no circumstances will Pafford EMS offer wage "advances" to employees. This especially applies in situations where there is a garnishment order and the "take-home" pay is significantly reduced.

Holiday Time

Purpose:

To offer certain holidays as paid time off to employees for relaxation and to spend time with family and friends.

Policy:

Despite the 24-hour nature of our operation, Pafford EMS will recognize certain days as holidays and will provide the day as a paid day off, and provide holiday pay (in addition to regular wages) for those employees who must work the holiday.

Procedure:

I. Standards.

A. The following days shall be considered paid holidays:

New Year's Day	Labor Day
Easter	Thanksgiving Day
Memorial Day	Christmas Day
Independence Day	

B. Non-office personnel who work on a recognized holiday will be paid an additional sum for the day, on top of their regular hourly rate, as follows:

- i. An additional \$100 for a full 24-hour shift
- ii. An additional \$50 for a full 12-hour shift

C. Office personnel will be paid 8 hours for the holiday when the office is closed.

D. Personnel wishing to work on a holiday may volunteer to do so; otherwise, holiday work will be assigned. We will permit as many employees as possible to be off for the holiday, but of course operational considerations will limit the number of people who may be off.

E. Employees are not permitted to request days off of their normal schedule for the day before, the day of, or the day following a holiday. Any PTO requests will be denied for those days.

II. Reporting Holiday Time.

A. All employees must clearly document any time they worked on an official paid holiday.

B. Holiday pay will be automatically calculated for all employees to which it applies and will be paid in the pay period in which the holiday occurs.

Paid Time Off (Field Employees)

Purpose:

To allow employees to have paid time off from work for personal purposes, vacations, and other occasions and to provide some income protection in the event of an illness.

Policy:

Pafford EMS has adopted a Paid Time Off (“PTO”) plan for purposes of calculating employee time off from work.

Procedure:

I. Eligibility.

- A. Employees accrue PTO at the following rates based upon years of service:
 - 0 years: 2 minutes, 22 seconds per hour worked
 - 1-3 years: 3 minutes, 36 seconds per hour worked
 - 4-6 years: 4 minutes, 54 seconds per hour worked
 - 7+ years: 6 minutes, 15 seconds per hour worked
- B. The maximum number of hours that an employee may accrue is 420 hours.
- C. New employees may not use PTO until successful completion of six months of regular and continuous service.

II. Scheduling PTO.

- A. PTO may be scheduled in hourly increments only. No partial hour increments may be taken.
- B. To schedule planned PTO, an employee is to request advance approval from his or her supervisor. Employees should make requests at least thirty (30) days in advance of the planned time off.
- C. Requests will be reviewed based on a number of factors, including business needs and staffing requirements, and will be granted whenever possible, but Pafford EMS cannot guarantee that a request for time off will be granted.
- D. Employees are not permitted to request days off of their normal schedule for the day before, the day of, or the day following a holiday. Any PTO requests will be denied for those days. Exceptions may be made where specific and appropriate coverage is found and approved in advance.

III. Unscheduled Absence.

Employees who need to be absent from work unexpectedly due to illness or other emergencies must notify their direct supervisor no less than four hours prior to the start of their scheduled shift. Employees are required to contact their direct supervisor each additional day of an unplanned absence, in accordance with the “Absenteeism & Tardiness” policy. Paid Time Off (PTO) will be applied to all absences, whether approved or unexcused, to ensure accurate tracking of time away from work and consistent application of attendance policies. This policy does not affect an employee’s right to use PTO in circumstances protected by law, such as intermittent leave under the Family and Medical Leave Act (FMLA).

IV. Rate of Pay and Overtime.

- A. PTO is paid at the employee’s regular hourly rate of pay at the time of absence.
- B. PTO cannot be used to accrue overtime or any other special forms of compensation.
- C. PTO is a gratuitous benefit of employment provided by Pafford EMS and is not considered to be in the nature of wages.

V. Separation from Employment.

- A. When an employee separates from employment, the employee will be paid for his or her available but unused PTO.

Paid Time Off

(Non-Field Administrative Salaried Employees)

Salaried employees are allocated a maximum sum of available PTO on their annual anniversary date based on years of service as indicated in the chart below:

YEARS	PTO TIME
0	1 WEEK
1-3	2 WEEKS
4-6	3 WEEKS
7+	4 WEEKS

Office/Admin employees are paid on a 40 hour work week, therefore 1 week of PTO is the equivalent of 40 hours. Managers/Supervisors are paid on a 50 hour workweek, therefore 1 week of PTO is the equivalent of 50 hours.

New employees may not use PTO until successful completion of six months of continuous and uninterrupted service.

Although PTO time is stated as a lump sum maximum, it is not considered earned as wages and is not a guaranteed amount. Salaried employees are not entitled to PTO until such time as it becomes available per the above allocation schedule, the employee applies for PTO in the manner required, and the request is approved in writing by the supervisor.

PTO for non-field administrative employees is considered a gratuitous benefit of employment with Pafford EMS and will not be paid when not used. However, up to one (1) week of the unused and available portion of the maximum allocation can be cashed out at the end of the anniversary year. For clarity, the maximum available PTO allocation must be used, cashed out (up to one week) or is lost. PTO is not carried forward from year to year.

All non-field administrative salaried employees will be required to submit a PTO request form to their direct reporting supervisor for approval. Once approved, the direct reporting supervisor will send the form to processing@paffordems.com. Your PTO will be added to the PTO calendar and forwarded to directdeposit@paffordems.com.

The employee going out on PTO must set an out of office email reply to notify other administration and field team members of the days they will be out. The out of office email reply will need to include the start date and end date of their absence and will need to identify the email address of who will be handling your responsibilities while you are out.

Bereavement Leave

Purpose:

To permit time away from work to grieve for the loss of a loved one.

Policy:

Pafford EMS will offer paid bereavement time for the death of certain family members.

Procedure:

I. Standards.

- A. Employees who lose a family member may be granted paid leave to attend services and address other matters related to the passing of a loved one.
 - 1. In the event of the death of a parent, child, spouse, brother, sister, grandparent, grandchild, or in law, employees may take up to 3 shifts of paid bereavement leave.
 - 2. In the event of the death of a niece, nephew, aunt, or uncle, employees may take 1 shift of paid bereavement leave.
 - 3. Employees are to provide Pafford EMS with notice of the death and the need for the bereavement leave as soon as possible, so that adequate coverage can be arranged.
- B. When a request for bereavement leave is made, Pafford EMS will coordinate coverage for any shift that is missed.
- C. Where additional time off may be required, available but unused PTO may be used in conjunction with the bereavement leave. The request for additional time must be coordinated through a supervisor at the time that the bereavement leave is first made.

Emergency Leave Request

Purpose:

To accommodate employees who desire a leave of absence to assist with relief efforts related to local, state, and federal emergencies or disasters, when requested by appropriate officials and/or emergency management agencies.

Policy:

Pafford EMS will accommodate employees with legitimate urgent or emergent business such as related to disaster relief efforts that requires them to miss work for extended periods of time to the fullest extent possible, as long as the request may be granted without compromising operational needs. Documentation from appropriate officials or emergency management agencies will be required.

Procedure:

I. Background.

- A. Pafford EMS typically asks its employees to provide advance notice when requesting the use of PTO.
- B. Pafford EMS recognizes that there are times when an emergency arises and adequate advance notice cannot be given. This is especially applicable to persons who participate as part of emergency response teams ready to respond to any state or federal natural disaster. Pafford EMS commends employees for participating in such programs, and does not want to hinder their involvement or otherwise adversely affect their employment status as a result of that involvement.
- C. At the same time, since Pafford EMS is itself an emergency service organization, we need to maintain adequate staffing at all times. We must have sufficient staff to meet our obligations to the public. Therefore, we may only grant emergency leave requests to the extent we can adequately maintain staff coverage here. In other words, not all leave requests may be honored if doing so may compromise our operations.

II. Approval Process.

- A. When an employee has a legitimate emergency situation that he or she knows will require an extended period of absence (other than military leave, family medical leave, or bereavement leave, which is covered in other policies), the employee should immediately discuss the need with his or her supervisor. Standard advance notice for leaves of absence will not be required.

- B. Where available, an employee may elect to take PTO that is available. Otherwise, the leave will be unpaid. Upon requesting the leave, the employee shall notify his or her supervisor of the desire to use any available PTO.
- C. The employee requesting emergency leave should submit verification of the need for the leave with the request for the leave. (For example: documentation from the emergency management agency authorizing the employee's participation).
- D. Leave requests will be considered on a first come, first served basis and with consideration to the need to have the employee remain at Pafford EMS. Leaves will only be granted if management concludes that adequate staffing can be maintained for day-to-day operations.
- E. Unless otherwise required by law, the maximum period of leave afforded under this Policy shall be 4 work weeks. Additional leave may be approved on a week-to-week basis, and/or in compliance with state and federal laws.
- F. If the leave request is granted, Pafford EMS will hold the employee's position open until the employee returns from the leave up to a maximum 4-week period. If additional leave is approved, Pafford EMS may not be able to keep the position open.
- G. Employees shall provide a brief report on their status and the anticipated need for continued leave on at least a weekly basis, and provide contact information at the location where they can be reached.
- H. Employees will not be paid any wages when on leave, unless they are part of an authorized disaster response system which reimburses the Pafford EMS for the wages of employees on emergency leave. If an employee is not specifically advised that he or she will be paid during the emergency leave assignment, the employee should assume that the leave is an unpaid leave.
- I. Any employee who does not follow this Policy and/or does not report to work as scheduled either prior to or after completion of an approved leave will be considered to have resigned his or her employment with Pafford EMS.
- J. All benefits paid by Pafford EMS will be maintained during the leave period, and the employee will be entitled to any benefits he/she would have ordinarily received had there been no emergency leave.

Family Medical Leave Act (FMLA)

Purpose:

To comply with federal laws regarding employee leaves of absence for certain family and medical-related issues.

Policy:

Pafford EMS shall offer FMLA-covered leaves of absences where appropriate, and where required by law, as indicated below and in the FMLA Poster Pafford EMS has posted.

Procedure:

I. Eligibility for Medical Leave.

- A. Employees may be eligible to take up to 12 weeks (consecutive or intermittent) of unpaid family/medical leave within a 12-month period as described in this Policy, if the reason for the leave qualifies under the Family and Medical Leave Act.
- B. Eligible employees who are family members of covered service members and are taking leave to care for a covered service member with a serious illness or injury incurred in the line of active military duty may be eligible to take up to 26 weeks of leave per 12-month period.
- C. Eligible employees who are family members of a covered military member are eligible to take 12 weeks of FMLA leave for “any qualifying exigency” arising out of the fact that a covered military member is on active duty or called to active duty status in support of a contingency operation.
- D. To be eligible, the employee must:
 - 1. Have worked for Pafford EMS for at least 12 months at any time in the last 7 years, and for at least 1,250 hours in the last 12 months.
 - 2. Be employed at a worksite that has 50 or more employees within 75 miles of that worksite.
- F. Once the FMLA leave has ended and the employee wishes to return to work, subject to certain regulatory exceptions, the employee will be restored to the same or an equivalent position upon return from leave.
- G. This Policy applies to eligible employees as described in this Policy for all Family/Medical leaves of absence. Any paid leave taken for FMLA-qualifying reasons will run concurrently with any unpaid Family/Medical Leave under this Policy. Any Workers’ Compensation leave period will also run concurrently with Family/Medical Leave.

II. Type of Leave Covered.

- A. **Covered Reasons.** In order to qualify as FMLA leave under this Policy, the employee must be using the leave for a covered reason under the Regulations. Covered reasons for which an eligible employee may take Family/Medical leave include:
1. The birth of a son or daughter and in order to care for the newborn child.
 2. The placement with the employee of a son or daughter for adoption or foster care and in order to care for the newly placed son or daughter.
 3. To care for the employee's spouse, son, daughter, or parent ("covered relation") with a serious health condition.
 4. Because of the employee's own serious health condition which renders the employee unable to perform an essential function of their position.
 5. To care for a covered service member with a serious injury or illness if the employee is the spouse, son, daughter, parent or next of kin of the service member. This type of leave is known as military caregiver leave. Eligible employees taking military caregiver leave may be eligible to take up to 26 weeks of leave in a single 12-month period.
 6. Because of any qualifying exigency arising out of the fact that employee's spouse, son, daughter or parent is a covered military member on covered active duty (or has been notified of an impending call or order to active duty) in support of a contingency operation. A "qualifying exigency" under this Paragraph "6" can be:
 - (a) Issues arising from the military member's short-notice deployment (i.e. 7 days' notice or less);
 - (b) Attending military events and related activities;
 - (c) Certain childcare and school activities;
 - (d) Making or updating financial and legal arrangements to address a military member's absence;
 - (e) Counseling;
 - (f) Taking up to 15 days to spend time with a military member who is on temporary rest and recuperation;
 - (f) Certain post-deployment activities within 90 days of the end of the covered active duty; and

- (j) Additional activities not encompassed in other categories but mutually agreed to by Pafford EMS and the employee.

Leave because of reasons “1” or “2” (birth or adoption or foster care) must be completed within the 12-month period beginning on the date of birth or placement.

Spouses employed by Pafford EMS who request leave because of reasons “1” or “2” (birth or adoption or foster care) or to care for an employee’s parent with a serious health condition may only take a combined total of 12 weeks leave during any 12-month period. Likewise, spouses who are both employed by Pafford EMS are limited to a combined total of 26 weeks of leave in a single 12 month period to care for a covered service member if each spouse is a parent, spouse, son or daughter, or next of kin of the service member.

B. **Serious Health Condition.** A serious health condition is defined as an illness, injury, impairment or physical or mental condition that involves inpatient care or continuing treatment by a healthcare provider, as these terms are defined below.

1. The term “inpatient care” means an overnight stay in a hospital, hospice, or residential medical care facility, including any period of incapacity, or any subsequent treatment in connection with such inpatient care.
2. The term “continuing treatment” includes examinations to determine if a serious health condition exists and evaluations of the condition. Treatment includes a telemedicine visit with a healthcare provider provided certain criteria are met. Treatment does not include routine physical examinations, eye examinations, or dental examinations. A regimen of continuing treatment includes, for example, a course of prescription medication or therapy requiring special equipment to resolve or alleviate the health condition. A regimen of continuing treatment that includes the taking of over-the-counter medications, bed rest, drinking fluids, exercise and other similar activities that can be initiated without a visit to a healthcare provider, is not, by itself, sufficient to constitute “continuing treatment” for purposes of FMLA leave.
3. A serious health condition involving “continuing treatment” by a healthcare provider includes any one or more of the following:
 - (a) *Incapacity and Treatment.* A period of incapacity of more than three, consecutive, full calendar days, and any subsequent period of incapacity relating to the same condition, that also involves:
 - (i) Treatment by a healthcare provider within 7 days of the first day of incapacity; and

- (ii) At least 1 other visit with a healthcare provider within 30 days of the first day of incapacity, unless extenuating circumstances exist; or
 - (iii) Treatment by a healthcare provider on at least one occasion, which results in a regimen of continuing treatment under the supervision of the healthcare provider.
 - (iv) Whether additional treatment visits or a regimen of continuing treatment is necessary within the 30-day period shall be determined by the healthcare provider.
 - (v) The term “extenuating circumstances” in Paragraph (3)(a)(ii) above means circumstances beyond the employee’s control that prevent the follow-up visit from occurring as planned by the healthcare provider. Whether a given set of circumstances are extenuating depends on the facts. For example, extenuating circumstances exist if a healthcare provider determines that a second in-person visit is needed within the 30-day period, but the healthcare provider does not have any available appointments during that time period.
- (b) *Pregnancy or Prenatal Care.* Any period of incapacity due to pregnancy or for prenatal care.
- (c) *Chronic Conditions.* Any period of incapacity or treatment for such incapacity due to a chronic serious health condition. A chronic serious health condition is one which:
- (i) Requires periodic visits (defined as at least twice a year) for treatment by a healthcare provider, or by a nurse under direct supervision of a healthcare provider;
 - (ii) Continues over an extended period of time (including recurring episodes of a single underlying condition); and
 - (iii) May cause episodic rather than a continuing period of incapacity (e.g., asthma, diabetes, epilepsy, etc.)
- (d) *Permanent or Long-Term Conditions.* The period of incapacity itself is permanent or long-term and treatment may not be effective. These are qualifying serious health conditions if the employee or the employee’s family member is under continuing supervision of a healthcare provider, even if they are no longer receiving active treatment.

(e) *Conditions Requiring Multiple Treatments.* Any period of absence to receive multiple treatments (including any period of recovery therefrom) by a healthcare provider or by a provider of healthcare services under orders of, or on referral by, a healthcare provider for:

(i) Restorative surgery after an accident or injury; or

(ii) A condition that would likely result in a period of incapacity of more than three consecutive, full calendar days in the absence of medical intervention or treatment, such as cancer (chemotherapy, radiation, etc.), severe arthritis (physical therapy), or kidney disease (dialysis).

4. The term “incapacity” means the inability to work, attend school or perform other regular activities due to the serious health condition, treatment therefrom, or recovery therefrom.

III. Amount of Leave.

A. Except in the case of military caregiver leave (leave to care for a covered service member with a serious injury or illness), an eligible employee’s FMLA leave entitlement is limited to a total of 12 work weeks of leave in a “rolling” 12-month period.

B. In a “rolling” 12-month period, each time an employee takes Family/Medical leave, the remaining leave entitlement would be any balance of the 12 weeks, which has not been used during the immediately preceding 12 months. For example:

If an employee has taken eight (8) weeks of leave during the past twelve (12) months, an additional four (4) weeks could be taken. If an employee used four (4) weeks beginning February 1, 2017, four (4) weeks beginning June 1, 2017, and four (4) weeks beginning December 1, 2017, the employee would not be entitled to any additional leave until February 1, 2018. However, beginning on February 1, 2018 the employee would be entitled to four (4) weeks of leave; on June 1, 2018, the employee would be entitled to an additional four (4) weeks; etc.

C. If an employee is on FMLA leave for a week or more, the entire week is counted as a week of FMLA leave, if a holiday falls during any week in which FMLA leave is taken. If the employee takes FMLA leave of less than a week, and a holiday falls during that week, the holiday will only count as FMLA leave if the employee was scheduled to work on the holiday on which the FMLA leave is taken.

IV. Process for Taking Leave.

A. The employee must provide proper notice of the need for leave.

1. *Employee Notice Requirements for FMLA Leave Foreseeable 30 or More Days in Advance.*
 - (a) An employee must give Pafford EMS at least 30 days' advance notice before FMLA leave is to begin if the need for leave is foreseeable based on an expected birth, placement for adoption or foster care, planned medical treatment for a serious health condition of the employee or of a family member, or the planned medical treatment for a serious injury or illness of a covered service member.
 - (b) For foreseeable leave due to a qualifying exigency, notice must be provided as soon as practicable, regardless of how far in advance such leave is foreseeable.
 - (c) In order to properly cover your shifts during any foreseeable FMLA leave, Pafford EMS asks all employees to try to provide as much notice as possible, even if it is just to provide a ballpark timeframe of the anticipated date and duration of the leave.
2. *Employee Notice Requirements for FMLA Leave That is Not Foreseeable 30 Days in Advance.*
 - (a) If 30 days' notice is not foreseeable in advance of the need for FMLA leave, notice must be given as soon as practicable (within 1 to 2 business days) of learning of the need for the leave.

For example, the employee's health condition may require leave to commence earlier than anticipated before the birth of a child.

Similarly, little opportunity for notice may be given before placement for adoption.
 - (b) Where the need for leave is not foreseeable, employees are expected to notify Pafford EMS within 1 to 2 business days of learning of the need for leave (except in extraordinary circumstances).
 - (c) Until the employee has provided the proper written notification of the need for FMLA leave, where the need for FMLA leave is not foreseeable in advance, the employee is still expected to comply with Pafford EMS's Absenteeism & Tardiness Policy.
3. Failure to provide proper notice without a reasonable basis may be grounds for Pafford EMS to delay the leave.
4. If an employee is planning a medical treatment, the employee must consult with the Pafford EMS regarding the dates of such treatment.

- B. Content of the Employee's Notice of the Need for Taking FMLA Leave.
1. An employee shall provide written notice setting forth the reasons for the requested leave, the anticipated timing and duration of the leave, and the anticipated start of the leave. This written notice must be provided to the Human Resource Department or, in such person's absence, the person in charge of the day-to-day operations of Pafford EMS.
 2. An employee who provides only verbal notification of the need for leave is required to provide a written follow-up notice within 1 to 2 business days after providing verbal notification.
 3. Where an employee fails to comply with the requirement to provide written notice of the need for taking FMLA leave, FMLA leave may be delayed or denied.
- C. Depending on the reason for the leave, the employee must provide written medical certification verifying the need for covered leave.
1. If the employee is requesting leave because of his or her own serious health condition or a covered relative's serious health condition, the employee and the relevant health care provider must supply medical certification verifying the need for covered leave.
 2. When an employee provides a written request for leave, Pafford EMS will provide the employee with a written Notice of Eligibility and Rights and Responsibilities within five (5) business days of the employee's request. This written Notice of Eligibility and Rights and Responsibilities will notify the employee of any requirement for a medical certification and when the form is due.
 3. The employee must return the medical certification form to Pafford EMS within 15 calendar days after receiving the written Notice of Eligibility and Rights and Responsibilities. Failure to provide the complete and sufficient requested medical certification in a timely manner (*i.e.*, within 15 days after receiving the medical certification form) might result in denial of leave until it is provided.
 4. Pafford EMS will advise employees if the medical certification form is incomplete or insufficient. A medical certification form is considered incomplete or insufficient if one or more of the applicable entries have not been completed, and/or if the information provided is vague, ambiguous, or non-responsive. Pafford EMS will state in writing what additional information is necessary to make the medical certification form complete and sufficient. The employee must correct the deficiencies and return the corrected medical certification form within seven (7) calendar days of being

notified of the deficiencies. If the deficiencies are not corrected or returned within this time frame, the employee's FMLA leave will be denied.

5. Once Pafford EMS receives a complete and sufficient medical certification form, Pafford EMS may authenticate it. Pafford EMS's Human Resources Department may also contact the doctor signing the medical certification form to clarify any remaining vague or unresponsive answers, but will not ask for information beyond that required by the medical certification form.
 6. Within five (5) business days after Pafford EMS has received a complete and sufficient medical certification form, Pafford EMS will provide the employee with a Designation Notice.
 7. Where an employee is taking leave for his own serious health condition, the employee will be required to present a fitness-for-duty certification in order to be restored to employment. The fitness-for-duty certification must address the employee's ability to perform the essential functions of the employee's position as listed in the employee's Position Description (located in the Appendix of this Personnel Handbook) or as attached to the Designation Notice.
 8. Pafford EMS, at its expense, may require an examination by a second health care provider designated by Pafford EMS, if it reasonably doubts the medical certification initially provided. If the second health care provider's opinion conflicts with the original medical certification, Pafford EMS, at its expense, may require a third, mutually agreeable, health care provider to conduct an examination and provide a final and binding opinion.
 9. Pafford EMS may also require re-certification of the serious health condition in connection with an absence by the employee. Failure to provide requested certification within 15 days may result in delay of further leave until certification is provided.
 10. Pafford EMS may require a subsequent medical recertification in less than 30 days if:
 - (a) The employee requests an extension of leave;
 - (b) Circumstances described by the previous medical certification form have changed significantly; or
 - (c) The employer receives information that casts doubt upon the employee's stated reason for the absence or the continuing validity of the certification.
- D. The employee must provide periodic status reports while on leave.

1. The employee must contact Pafford EMS on the second and fourth Monday of each month regarding the status of the condition and intention to return to work.
 2. Employees must also give notice as soon as practical (within 2 business days if feasible) if the dates of leave change, if the leave must be extended, or the intended dates of the leave if the dates were initially unknown at the time of the request.
- E. An approved family/medical leave is unpaid and runs concurrently with all other types of available paid leave.
1. Family/Medical leave is unpaid and runs concurrently with other types of leave, including PTO or Workers' Compensation, that may also be taken for an FMLA-qualifying reason. This means that the employee receives pay according to Pafford EMS's PTO or other applicable paid leave policies during the period of otherwise unpaid FMLA leave. This also means that the employee will be exhausting PTO or other paid leave entitlements at the same time he is exhausting Family/Medical leave entitlements.
 2. In no case can the substitution of paid leave time for unpaid leave time result in an employee's receipt of more than 100% of salary.

V. Terms and Conditions of Leave.

- A. Approved family/medical leave may include an intermittent and reduced schedule leave.
1. Certain types of FMLA leave may be taken intermittently (including partial days) or on a reduced leave schedule (reducing the usual number of hours you work per work week or work day). Intermittent or reduced schedule leave may be taken because of the employee's own serious health condition, to care for a spouse, parent, son, or daughter with a serious health condition, or to care for a covered service member with a covered serious injury or illness. In all such instances, there must be a medical need for the leave which is best accommodated by intermittent or reduced schedule leave. Leave due to a qualifying exigency may also be taken on an intermittent or reduced leave schedule basis.
 2. If leave is unpaid, Pafford EMS will adjust the employee's salary or compensation based on the amount of time actually worked.
 3. The employee must make a reasonable effort to schedule time off so as not to disrupt the operations of Pafford EMS. The employee must provide not less than thirty (30) days' notice before the date the leave is to begin, unless the medical condition requires leave to begin in less than thirty (30) days.

4. The employee must provide the Human Resource Administrator with the dates on which medical treatment is expected along with the expected duration of the treatment or the length of time needed to care for a family member.
 5. While the employee is on an intermittent or reduced schedule leave for foreseeable medical treatments, Pafford EMS may temporarily transfer the employee to an available alternative position, which better accommodates the employee's intermittent leave and which has equivalent pay and benefits.
- B. Employees on approved Family/Medical Leave for their own serious health condition must provide a fitness-for-duty certification in order to return to work.
1. If the employee's leave is because of his or her own serious health condition, except in the case of intermittent leave, the employee will be required to present a fitness-for-duty certification in order to be restored to employment. The fitness-for-duty certification must address the employee's ability to perform the essential functions of the employee's position as listed in the employee's Position Description or as attached to the Designation Notice. The fitness-for-duty certification must indicate that the employee is capable of performing the essential functions of the employee's position.
 2. Employees may obtain a Return to Work Medical Certification Form from the Human Resource Administrator to demonstrate fitness for work, as verified by a physician.
 3. Employees failing to provide the Return to Work Medical Certification Form will not be permitted to resume work until the form is provided.
- C. While on approved FMLA (or other) leave of absence, employees are not permitted to be employed or volunteer elsewhere in a capacity which is contrary to the employee's need for leave or in a type of position which the employee could temporarily hold for Pafford EMS to accommodate the employee's inability to work in his or her regular position. An employee who violates these restrictions is subject to discipline, up to and including termination from employment.

VI. Impact of Leave on Medical and Other Benefits.

- A. During an approved Family/Medical leave, Pafford EMS will maintain the employee's health benefits as if the employee continued to be actively employed.
1. If paid leave is substituted for unpaid Family/Medical leave, Pafford EMS may deduct the employee's portion of the health premium as a regular payroll deduction.

2. If the leave is unpaid, the employee must pay his/her portion of the premium by issuing a check to Pafford EMS no later than the 15th day of each month the employee is on approved leave.
3. The employee's health care coverage will cease if the premium payment is more than 30 days late.
 - (a) If the payment is more than 15 days late, Pafford EMS will send the employee a letter indicating the premium is late.
 - (b) If Pafford EMS does not receive the co-payment from the employee within 15 days after the date of the letter, the employee's coverage will cease.
 - (c) If the employee elects not to return to work for at least 30 calendar days at the end of the leave period, the employee will be required to reimburse Pafford EMS for the cost of the health benefit premiums paid by Pafford EMS for maintaining coverage during the employee's unpaid leave, unless the employee is unable to return to work due to the employee's serious health condition, or other circumstances beyond the employee's control.

VII. Misrepresentation of Leave.

- A. If it is discovered that a leave of absence granted for a specific purpose is not being used for that purpose, Pafford EMS may cancel the leave and direct the employee to return to work.
- B. An employee who fraudulently obtains leave is not protected by the FMLA's job restoration or maintenance of health benefits provisions.
- C. Any employee who misrepresents the purpose for which leave is taken may be subject to disciplinary action, up to and including termination from employment.

VIII. Failure to Return to Work.

- A. An employee who fails to return to work at the expiration or cancellation of an approved Family/Medical leave, without satisfactory explanation or an approved extension of leave which may be available under federal or state law is considered to have resigned from his or her position with Pafford EMS.

Leave of Absence Due to Pregnancy, Childbirth, or Related Medical Conditions

Female employees may be afforded six weeks of unpaid leave due to pregnancy, childbirth, or a related medical condition. This period may be extended for up to four months if the employee is disabled on account of pregnancy, childbirth, or a related medical condition. Such extension should be sought pursuant to the Policy regarding Illness, Pregnancy, and Disability Accommodation.

Leave taken pursuant to this section runs concurrently with any other type of leave, including leave available under the Family and Medical Leave Act. Any applicable paid time off available under other Pafford EMS policies must be utilized with leave provided by this section.

Illness, Pregnancy, and Disability Accommodation Policy

Purpose:

To comply with state and federal laws regarding absences from work and the ability to work when staff members suffer from illness, disability, or pregnancy, childbirth or related medical conditions.

Policy:

Pafford EMS is committed to complying with all federal, state, and local laws affording equal employment opportunities for individuals with a disabling illness, injury or other medical condition or who are affected by pregnancy, childbirth or a related medical condition. Consistent with this commitment, Pafford EMS will not discriminate, nor permit any of its employees or agents to discriminate, against applicants or personnel on the basis of a disability, pregnancy, or pregnancy related conditions. Further, Pafford EMS will provide reasonable accommodations for personnel who suffer from certain disabling illnesses or diseases or those who are affected by pregnancy, childbirth, or related medical conditions when doing so would allow the individual to perform the essential job functions, does not pose a threat to the health or safety of patients or others, and when the accommodation does not otherwise pose an undue hardship on the Company.

Procedure:

I. Application for accommodation.

- A. If an applicant or employee believes he or she needs an accommodation because of a disability or pregnancy related circumstance, that individual is responsible for submitting a request for accommodation to the Human Resources Director. While initially the request may be made verbally, Pafford EMS encourages employees to make their request in writing and to include relevant information, such as:
 - A description of any suggested accommodation.
 - The reason an accommodation is needed.
 - How the accommodation will assist the employee in performing the essential functions of the job.
- B. After receiving the request, Pafford EMS will engage in an interactive dialogue with the employee to determine the precise limitations of the disability and explore potential reasonable accommodations. Pafford EMS encourages the employee to suggest specific reasonable accommodations that he or she believes would allow performance of the job. However, Pafford EMS is not required to make the specific accommodation requested and may provide an alternative, effective accommodation, to the extent any reasonable accommodation can be made without imposing an undue hardship on the Company.

- C. Pafford EMS makes determinations about reasonable accommodations on a case-by-case basis considering various factors and based on an individualized assessment in each situation. Pafford EMS strives to make determinations on reasonable accommodation requests expeditiously, and will inform the individual once a determination has been made. If any individual has questions about a reasonable accommodation request submitted, he or she should contact the Human Resources Director.
- D. Personnel with temporary or minor contagious or communicable diseases (e.g., flu, cold) that could easily spread to other personnel or patients should refrain from working until their condition improves.

II. Medical Information.

- A. If the disability or need for accommodation is not obvious, Pafford EMS may ask the requesting individual to provide supporting documents (medical or otherwise) showing that he or she has a disability or covered pregnancy related condition within the meaning of the law, and that the condition necessitates a reasonable accommodation. If the employee or applicant fails to provide the requested information, the request for a reasonable accommodation may be denied.
- B. Pafford EMS will take reasonable precautions to protect confidential medical information received by personnel concerning their health condition or request for accommodation from inappropriate disclosure and/or access. Managers and supervisors have a responsibility to respect and maintain the confidentiality of personal medical information, but it may also be necessary for appropriate personnel to have access to some or all of that information to the extent reasonable accommodations may be made to properly deal with return to work issues or to determine if continued service is possible.

III. No Retaliation.

Pafford EMS expressly prohibits any form of discipline, reprisal, intimidation, or retaliation against any individual for requesting an accommodation or reporting discriminatory conduct in good faith.

If employees or applicants feel that they or someone else may have been subjected to conduct that violates this policy, they should report it immediately to the Human Resources Director.

Jury Duty Leave

Purpose:

To accommodate employees called for civic duty.

Policy:

Pafford EMS shall permit employees called for jury duty to serve jury duty, without negatively impacting their employment status or benefits, and shall compensate them accordingly.

Procedure:

I. Standards.

- A. Employees are encouraged to fulfill their civic responsibilities by serving jury duty when required.
 - 1. Personnel on jury duty will receive time off for jury duty. The time off will be without loss of compensation or benefits for up to 1 day of jury duty. Further days of absence will be unpaid.
 - 2. Employees are not required to use accumulated leave time (i.e. PTO, vacation, personnel days) to serve on jury duty, but may voluntarily elect to do so if they wish to use to utilize paid leave while serving on jury duty beyond the first compensated day of absence for jury duty service.
- B. Any employee that has been called for jury duty must provide notice to his or her supervisor, as soon as notified by the court.
- C. If it is determined that serving jury duty will create an operational hardship, Pafford EMS may make efforts to ask to have the person excused from such service, if the employee agrees.
- D. All other benefits will be covered and will accrue during any jury duty leave as if the employee was continually working.
- E. The employee must provide verification of the jury duty leave, including official court attendance verification.

Bone Marrow and Organ Donor Leave

Purpose:

To accommodate employees who choose to donate organs or bone marrow.

Policy:

Pafford EMS shall permit employees time off consistent with state law related to donation of organs or bone marrow. To the extent FMLA leave may also cover the absence, such leave (and any other available unpaid leave of absence) will run concurrently with leave provided under this Policy.

Procedure:

I. Bone Marrow Donation

- A. Qualified employees will be granted paid leaves of absence of up to forty (40) hours to undergo a medical procedure to donate bone marrow.
- B. If leave is granted under this Policy beyond forty hours, the employee may elect to use any other available and applicable paid time off for the balance of the leave period.

II. Bone Marrow and Organ Donation

- A. Employees may take unpaid leave to serve as bone marrow donors, in addition to any other medical, personal, or other paid leave offered by Pafford EMS. Employees may, at their option, use any available and applicable paid time off during the period of leave for bone marrow donation.
- B. Leave will be granted for at least the lesser of: (a) the time requested by the employee, or (b) 90 days.

III. General Requirements

- A. Requests for leave under this Policy must be made in writing and delivered to the Human Resources Director.
- B. Pafford EMS will require verification by a physician of the purpose and length of leave needed under this Policy.
- C. Pafford EMS will not retaliate against an employee for requesting or obtaining leave under this Policy.

Crime Victim Leave

Purpose:

To provide time off to crime victims as defined by law.

Policy:

Pafford EMS shall permit employees who are crime victims or who are representatives of crime victims time off consistent with the laws established by the state of Arkansas related to certain crimes.

Procedure:

- A. Employees are eligible for unpaid leave under this Policy if they are either:
 - 1. Crime victims of a sex offense, an offense against a minor, or any violent crime.
 - 2. Representatives of crime victims, including members of a victim's family (spouse, child, stepchild, parent, stepparent, or sibling), or another individual representative designated by the victim or the court where the crime is or could be prosecuted.
- B. Leave is permitted when a crime victim or representative of a crime victim attends a criminal justice proceeding if doing so is reasonably necessary to protect the victim's interest or to prepare for a criminal justice proceeding if requested by the prosecuting attorney.
- C. Any paid time off which is available and applicable under any Pafford EMS policy may be utilized during this leave, at the option of the employee.

Other Leave of Absence

Purpose:

To accommodate the personal needs of employees by allowing unpaid time off if needed.

Policy:

Pafford EMS shall permit unpaid leaves of absence in certain situations as operational needs permit or as otherwise required by law. All unpaid leave will be reviewed on a case-by-case basis and will be approved at the discretion of management. This Policy is intended to be read in conjunction with the Accommodation Policy and Family and Medical Leave Policy and is not intended to limit leave which may be available as a reasonable accommodation due to pregnancy, for a disabling medical condition suffered by the employee, or which is otherwise available under the FMLA or other state or federal law.

Procedure:

I. Standards.

- A. Pafford EMS will make provisions for certain unpaid absences, taken at the request of the employee for certain health, medical, or personal reasons.
- B. We will make every effort to provide our employees with the requested unpaid leave of absence, but cannot guarantee that benefits will remain available during any such absence. Benefit continuation depends upon the terms of the plan, and the length of the desired leave.
- C. Any employee requiring an unpaid leave of absence is to contact his or her supervisor as far in advance as possible so that proper accommodations can be made, and to prepare for a possible return at some time in the future.
- D. Short term and temporary unpaid leaves of absence where additional time off is requested, but the employee has exhausted all Personal, Sick and Vacation Time, can be granted so long as appropriate coverage is available, and operations are not negatively impacted.
- E. Leaves will be considered on a case-by-case basis. In determining whether to approve leave which is not related to a disabling medical condition or pregnancy, consideration will be given to the employee's work history, tenure, and need for leave time.
- F. Except where otherwise provided by state or federal law, leave will only be granted for a maximum period of 3 months, and must be approved on a month-to-month basis.

- G. Upon completion of the leave, Pafford EMS will attempt to assign the employee to the same position held at the start of the leave, but cannot guarantee that position will be available.
- H. Any employee who fails to report to work at the conclusion of the leave period will be considered to have voluntarily resigned employment.

Military Leave

Purpose:

To recognize military service obligations, and comply with federal and state laws concerning such military service obligations.

Policy:

Pafford EMS shall permit employees with military obligations to temporarily be excused from employment without affecting their full-time non-military career.

Procedure:

I. Background.

- A. The Uniformed Services Employment and Reemployment Rights Act (USERRA), and related state laws, provide protection to employees of Pafford EMS who still actively engage in certain military activities.
- B. Employees of Pafford EMS who also serve in the Army, Air Force, Navy, Marine Corps, Coast Guard, the respective reserves for these military branches, the National Guard, the state's armed forces, or as other National Disaster Medical System commissioned employees, or others as designated by the President, are covered under this Policy.
- C. A person who has performed, applies to perform, or has an obligation to perform services in a uniformed service shall not be denied the following:
 - 1. Initial employment.
 - 2. Reemployment.
 - 3. Retention of employment.
 - 4. Promotion.
 - 5. Any benefit of the employer.
- D. An employee covered by this Policy shall not be subject to discipline or retaliation based upon:
 - 1. Action taken to enforce USERRA or related state military leave protections.
 - 2. Testimony related to USERRA or related state military leaves.
 - 3. Investigation related to a leave covered under USERRA or state law.

- 4. Exercise of USERRA rights or any similar right provided by state law.
- E. Military leave includes active service, inactive or active training, or other national guard training, service, or other requirements, as outlined under the law.
- F. Cumulative absence for military service shall not exceed 5 years, with certain exceptions as described by law. USERRA or related state law rights are no longer available after 5 years of military leave have been used, with limited exceptions provided by law.
- G. Entitlement to protection under military leave laws terminates upon separation from the uniformed service for dishonorable or bad conduct discharge, or dropping from military rolls when the individual has been absent without authority for more than 3 months or is imprisoned by a civilian court.

II. Requesting Military Leave.

- A. An employee shall provide advance notice to his or her supervisor as soon as the employee is aware of the dates the employee will be on military duty so that arrangements can be made for replacements during this absence, unless military necessity prevents such notice or it is otherwise impossible or unreasonable.
- B. Copies of the military order asserting the need for military duty leave will be requested.
- C. Unless specific notice is received that there is no intent to return to work, a request for a military leave of absence will presume that there is an intent to return to employment.

III. Benefits While on Leave.

- A. Employees on military leave will be treated as taking an unpaid leave of absence. Employees may elect to apply available and unused PTO to the military leave if desired, in order to receive some compensation during military service time spent away from work.
- B. The law provides for health benefits continuation for employees who have coverage under Pafford EMS's health plan and who are absent from work to serve in the military. If an employee's coverage would terminate because of an absence due to military service, the employee may elect to continue the coverage for up to 24 months after the absence begins or for the period of service, whichever period is shorter. Pafford EMS may require the employee to pay for the cost of such health insurance (at a rate permitted by law). If the military service is for 30 days or fewer, the employee cannot be required to pay more than his/her normal share of the premium. If coverage lapses, and/or upon reinstatement, the employee is entitled to the same health insurance benefits he or she would have been entitled had the

military leave not occurred (without any waiting period, or pre-existing condition exclusions being applied).

- C. All seniority dates and benefits will be retained during a military leave as though the employee remained continually employed, except that actual “working-time” benefits will not accrue, as military service time will not count as “working-time.”
- D. Pafford EMS contributions to an employee retirement plan for the employee may continue. Upon the employee’s return to work after a military leave, the employee may be required to contribute to the retirement fund for the time spent on military leave.

IV. Eligibility for Re-Employment Rights.

- A. **Conditions for Reemployment.** Except as otherwise provided by law, an employee will be entitled to restoration of employment when all of the following conditions exist:

- 1. Employee held a civilian job with Pafford EMS prior to leave.
- 2. Employee gave advance notice to Pafford EMS except when prevented from doing so by military necessity.
- 3. The period of service did not exceed five years (with limited exceptions provided by law).
- 4. Employment with Pafford EMS prior to military service was not merely for a brief, non-recurrent, period and there was a reasonable expectation that the employment would have continued indefinitely or for a significant period.
- 5. Employee was released from military service under honorable conditions.
- 6. Employee reported back to work in a timely manner or submitted a timely application for reemployment in accordance with this Policy.

- B. **Timing of Return to work.** Time limitations applicable to an employee’s return to work or application for reemployment following military leave depend on the duration of the military service as follows:

- 1. If service was less than 31 days, the employee must return to work at the beginning of the first full regularly scheduled working period on the first calendar day following completion of service and the expiration of 8 hours after a time for safe transportation back to the employee’s residence.

2. If service was for 31-180 days, the employee must submit an application for reemployment no later than 14 days following completion of service. If such is impossible or unreasonable through no fault of the employee, the application must be submitted as soon as possible on the next day when submission becomes possible.
3. If service was for more than 180 days, the employee must submit an application for reemployment no later than 90 days after completion of service.
4. Deadlines to report to work or apply for reemployment can be extended to accommodate a period during which an employee was hospitalized or convalescing from a service connected injury.
5. Other exceptions to timing of an employee's return to work may apply depending on individual circumstances. Otherwise, if a returning employee fails to provide notice of intent to return to work or report within the requisite time limits, he or she may be subject to Pafford EMS's regular policies and procedures regarding attendance.

C. Restoration of Employment. With some exceptions, upon an employee's timely notice of return to work as set forth above, he or she will be restored to employment in the following manner depending upon the period of military service:

1. Less than 91 days of service – Employee is entitled to the job he or she would have attained absent military service, provided the employee is or can become qualified for that job. If unable to become qualified for a new job after reasonable efforts by Pafford EMS, the employee is entitled to the job he or she left.
2. More than 90 days and less than 5 years of service – Employee is entitled to reinstatement as indicated above OR to a position of like seniority, status, and pay, the duties of which the employee is qualified to perform.
3. Employee with a service related disability – If after reasonable accommodation efforts by Pafford EMS, an employee with a disability incurred or aggravated during military service is not qualified for employment in the position he/she would have attained or the position he/she left, the employee will be employed in any other position of similar seniority, status, and pay for which the employee is qualified or could become qualified with reasonable efforts by Pafford EMS. If no such position exists, the employee is entitled to another position which is the nearest approximation of

the position to which the employee is otherwise entitled, in terms of status and pay, with full seniority.

4. To the extent that refresher and/or retraining courses are required to meet required level of knowledge for a position, Pafford EMS will make reasonable efforts to help the employee meet such requirements. For example, if the employee was in line to receive EMT-Paramedic training at the time of the employee's military leave, upon the employee's return, the employee may be entitled to receive such training.
5. Any employee who has been reemployed following military leave cannot be discharged without "cause" for one year after the reinstatement if the military service was at least 181 days, and for 180 days after the reinstatement if the military service was between 30 and 180 days.
6. Pafford EMS is not required to reinstate employees if circumstances have changed to the extent that reinstatement is impossible, or if, based upon the type or nature of employment, reinstatement was not expected.

D. Discrimination Prohibited. Pafford EMS will not take adverse employment action against any employee or applicant because that person has exercised, or seeks to exercise, rights under the military leave laws or assists another person in doing so. If employees or applicants feel that they or someone else may have been subjected to conduct that violates this policy, they should report it immediately to the Human Resources Director.

Health Insurance & Continuation of Health Care Insurance Under COBRA

Purpose:

To maintain the health and well-being of employees and families through continuation of health care benefits when an employee is not working and a COBRA qualifying event has occurred.

Policy:

Pafford EMS will provide health insurance benefits to employees eligible to participate and will continue health insurance benefits for eligible employees in accordance with federal regulations and this Policy.

Procedure:

I. Health Insurance.

- A. Pafford EMS, in the interest of providing quality benefits and maintaining the health, safety, and well-being of its employees, provides health insurance to its employees and families.
- B. Pafford EMS will contract with insurance companies to provide health insurance, to the extent Pafford EMS is able to continue to do so. Insurance coverage will be reviewed annually to determine affordability to Pafford EMS.
- C. Information about our current health insurance plan can be obtained by speaking to our insurance coordination representative, our broker, or by accessing the insurance company's website.

II. Eligibility.

- A. Employees who have been full time employees for the requisite number of days required by the terms of the plan are eligible to participate in Pafford EMS's group health insurance program. Pafford EMS currently covers a portion of the employee's health care insurance premium, dependent on the employee's elections, but this coverage could change at the sole discretion of management.
- B. At the end of the employee's employment with Pafford EMS, all employer-provided insurance coverage shall cease, effective on the last day of employment or the end of the employment month depending on the plan chosen, unless the covered individual is eligible to and opts to continue coverage under COBRA.

III. Additional Coverage Under COBRA.

- A. Eligible employees and dependents enrolled in the Pafford EMS group health insurance plan (provided that it is a covered plan under COBRA) are eligible for continued participation for a temporary period (usually up to 18 months) in specific circumstances where the coverage would otherwise end.
- B. COBRA provides for temporary coverage for a specific period of time, at the expense of the employee, for cost of premiums. The continuation of coverage depends on the qualifying event. Such qualifying events include:
 - 1. Voluntary or involuntary separation from employment of the covered employee, for reasons other than gross misconduct.
 - 2. Death of the covered employee.
 - 3. Reduction in the number of hours worked by the covered employee.
 - 4. Divorce or legal separation.
 - 5. Medicare entitlement.
 - 6. Loss of “dependent child” status.
- C. Once eligible, COBRA coverage shall continue unless one of the following occurs:
 - 1. A qualified beneficiary begins coverage under another group health plan.
 - 2. Maximum coverage date has been met (18 or 36 months after the qualifying event, depending on the nature of the event).
 - 3. Timely payment for premiums is not made.
 - 4. The employer health plan ceases to exist.
 - 5. A qualified beneficiary becomes eligible for Medicare.
 - 6. A qualified beneficiary engages in conduct that would justify termination of coverage, for example, filing of a false claim.
- D. All employees are encouraged to consult with their supervisor or the benefits coordinator if they have any questions regarding continuation of coverage. The supervisor shall direct the employee to the appropriate person within Pafford EMS to address the concerns of the employee.

Reporting Workplace Injury/Workers' Compensation

Purpose:

To comply with federal and state laws concerning safety in the workplace, to protect employees from injury in the workplace, and to provide wage loss and medical benefits when an employee is injured on the job and cannot work.

Policy:

Pafford EMS requires its employees to report all instances of injuries at the workplace so that appropriate steps may be taken. Strict adherence to this Policy is necessary to ensure appropriate benefits are provided when there is a bona fide workplace-related illness or injury.

Procedure:

I. Standards.

- A. An employee suffering an injury while on-duty shall promptly advise his/her supervisor and complete appropriate paperwork, as required by Pafford EMS and/or the relevant state agency. Injuries include, but are not limited to:
 - 1. Injuries of any nature sustained in any Pafford EMS vehicle (or personal vehicle) received while performing job duties.
 - 2. Injuries sustained as a result of moving and transporting patients.
 - 3. Injuries received as a result of patient care (e.g., needle sticks, cuts, possible infectious disease exposure).
- B. All relevant state agency reporting requirements shall apply.

II. Workers' Compensation Insurance.

- A. Pafford EMS carries Workers' Compensation Insurance to provide for payment of medical expenses and lost wages in the event of a work-related accident or illness. To qualify, the injury must occur within the course and scope of employment.
- B. The amount of benefits payable (medical expenses, lost wages, etc.) and the duration of payment depend on (among other things) the nature and severity of the employee's injury or illness, amount of lost work time, and ability to physically perform essential job functions. All medical and wage loss benefits will be provided in accordance with state and federal laws.
- C. Failure to immediately report work related injuries may have a negative effect on the ability to receive prompt Workers' Compensation benefits.

- D. Workers' Compensation benefits will apply only to injuries sustained on duty, and under no circumstances will apply to injuries sustained by voluntary, non-work activities.
- E. Based upon state law, there is a waiting period from the date of the accident until wage benefits may be owed.
- F. When an employee qualifies for Workers' Compensation lost wage benefits, the employee will receive reimbursement at the standard Workers' Compensation reimbursement rate as paid by the insurance carrier.

III. Reporting Procedures.

- A. As soon as an employee believes he or she may have suffered a work-related injury, the employee should follow the following procedures:
 - 1. Where possible, provide a verbal report of the incident immediately to his or her supervisor, prior to any written documentation.
 - 2. Seek immediate and appropriate medical attention in accordance with Company Policy.
 - 3. Complete a report of accident/injury in accordance with Company Policy.
 - 4. Obtain appropriate pre-authorization information from the employee's supervisor, such as the Workers' Compensation claim number, which may be required for all future treatments.
 - 5. Cooperate with any insurance adjuster or agent who may contact the employee regarding the accident.
 - 6. Provide a note from the employee's health care provider concerning the nature and scope of the injury, input on performing the functions of the employee's job, and the length of absence that may be required.
 - 7. Take appropriate steps to coordinate time off with the employee's supervisor.
- B. The employee's supervisor will be involved in the Workers' Compensation claim, and shall follow the following procedures:
 - 1. Review the "Employee's Report of a Work-Related Injury" and any witness accounts, and investigate the nature and scope of the injury.
 - 2. Obtain relevant documentation regarding the injury and submit all information gathered to the workers compensation administrator. The

administrator will prepare the first report of injury and submit to the insurance company.

3. Provide for appropriate accommodations, where possible, when an employee who has suffered a work-related injury has been cleared to return to work in a minimal or “light duty” capacity.
4. Take steps to prevent the hazard, and prevent future occurrence of the event that caused the harm. Where necessary, notification of possible contamination and/or infection should be made to appropriate state agencies.
5. In the event that training or new policy is required, based upon the accident and injury, the supervisor will coordinate with relevant Pafford EMS staff to ensure prompt action to prevent future occurrence.
6. In cases where work must be missed, the treating medical professional or physician must authorize the absence. The employee’s treating physician should provide a note specifying the extent of the injury, the treatment date(s), the amount of time that must be taken off work, an anticipated return date (if any), and any restrictions upon the employee’s return to work, based on a review of the essential functions of the job.
7. Modified or light duty assignments may be available where a physician indicates that the employee is able to perform some, but not all work duties. Whether light duties will be available will have to be made on a case by case basis, depending upon the work functions that can be performed, the “light duty” that may be available, and the recommendations of the treating physician.
8. Any and all Workers’ Compensation claims, benefits, and injuries are subject to investigation by the employee’s supervisor, as well as insurance adjusters, and other relevant parties. Faking an injury in an attempt to obtain improper Workers’ Compensation benefits is a crime. Full cooperation in any insurance investigation is expected. Additional relevant investigation and reporting information is contained in the forms and procedures attached to this Policy.
9. All decisions regarding liability, insurance coverage, and payments will be made by the insurance carrier, and will be subject to insurance review and appeal processes. Based upon the degree of the injury an employee may become eligible for short or long term disability coverage.
10. Pafford EMS will not retaliate against any employee who makes a good faith report of a work-related injury.

Off-Duty Access

Purpose:

To protect patient confidentiality, maintain a professional workplace environment, maintain facility security, and avoid unnecessary distractions.

Policy:

Pafford EMS limits off duty employee access to the interior of the building or any working areas and equipment after the employee's work shift ends.

Procedure:

I. Standards.

- A. Employees are expected to promptly leave the interior of any buildings and all working areas at the end of their shift, so as not to disrupt the work of the oncoming shift.
- B. Employees may enter the station when they are not scheduled to work, or otherwise off-duty, for the limited purposes of retrieving a paycheck, attending authorized Company meetings or educational activities, conducting official Company business, or at the request or with the approval of a supervisor for purposes of conducting Company business.
- C. Employees may not "volunteer" their services while off duty to perform the same or similar work they perform as an employee, since the law requires that such hours must be counted as work time, for which payment will be required. Non-work related volunteer services (such as, but not limited to, yard work, snow removal or fundraisers) that may require off-duty participation at the station are permitted.
- D. Off-duty access is limited to protect facility security, prevent distractions to on-duty personnel, and avoid possible inappropriate disclosure of patient information. Off-duty personnel in working areas could lead to unnecessary and preventable disclosures of patient information.

Performance Feedback & Goal Setting

Purpose:

To improve the quality of care that is provided to our patients through careful monitoring of staff performance, and to provide for wage increases to reward good job performance.

Policy:

Pafford EMS will evaluate its employees to identify strengths and weaknesses and establish goals, with the objective of improving overall job performance.

Procedure:

I. Job Description.

- A. Each employee will receive a copy of his or her job description outlining the duties of that position. This includes new hires and individuals promoted to new positions within Pafford EMS.
- B. Job descriptions will be provided for signature as part of the employee's onboarding process.

II. Performance Review.

- A. Pafford EMS will periodically monitor employee performance and provide informal and formal feedback based on performance evaluation criteria. Performance feedback and goal setting will usually be done:
 - 1. At the end of the initial Introductory Period.
 - 2. During the annual review period.
 - 3. At the end of a new Introductory Period following a job transfer or reassignment to new duties.
 - 4. Following a significant change in job performance, for which an employee is placed on probation.
- B. Supervisors will review job descriptions with all employees at each annual performance appraisal date. At that meeting:
 - 1. An action plan may be established for future appraisals.
 - 2. Strengths and weaknesses, and areas that are in need of improvement will be discussed.

3. An evaluation will be based upon actions as they relate to job duties, as well as personnel, patient, and outsider interactions.
 4. A review of any disciplinary actions, and appropriate course of action required in light of any disciplinary history may occur.
- C. Comments or disagreements with performance should be discussed openly during the review session. If an employee is not satisfied with a supervisor's explanation of a performance appraisal, he or she may review the objection with the next highest ranking official.
 - D. Periodic informal review may also occur. Supervisors may provide regular verbal feedback to staff to continually monitor performance and to serve as a resource for the staff member.

III. Merit Increases.

- A. Depending on business conditions, employees may be eligible for a merit pay increase on the yearly anniversary of the employee's commencement of employment.
- B. Merit pay increases, if given, will be based on job performance and workplace conduct during the previous year, as determined at the annual review.
- C. Employees are not guaranteed an annual merit pay increase, as increases may not be given on a recurring basis due to financial conditions and other factors.

Separation from Employment/Exit Interviews

Purpose:

To improve patient quality of care and operation of our ambulance service, through obtaining candid feedback from employees who terminate their employment with Pafford EMS. This information is also used to help Pafford EMS determine its strengths and weaknesses, identify possible compliance problems, and identify other important matters affecting the workplace. We will consider the information and opinions provided in evaluating ways to improve our operations and ensure the highest level of compliance in everything we do.

Policy:

All departing employees shall participate in an exit interview with a management representative or complete an exit interview questionnaire prior to their departure to enable Pafford EMS to gather information about possible opportunities for improvement with its organization/operations that they can be considered and addressed.

Procedure:

I. Voluntary or Involuntary Separation from Employment.

- A. Any employee wishing to voluntarily end his or her employment is asked to submit a written resignation notice to the employee's Supervisors. Two weeks advance notice of the employee's last day of work is requested.
- B. Any employee terminated, with or without cause may be asked to leave immediately, or be granted a certain amount of time before the employee is separated from employment.
- C. In all separations from employment, employees must return any and all equipment, including radios and keys to the employee's supervisor on or before the last day of employment.

II. Employee Exit Interviews.

- A. An exit interview will be conducted by the employee's supervisor and/or the Human Resources Department and Directors if needed and is designed to help the organization determine its strengths, areas where improvement is needed, and to identify important issues affecting the workplace.
- B. Exit interviews will be completed while the employee is still an employee of the organization, and, if possible, on the organization's property.
- C. If an exit interview is conducted, the interviewer will prepare a report of the exit interview with the individual's answers noted during the interview itself. The

employee should sign at the bottom of the questionnaire/answers indicating that the employee has reviewed his/her answers and that they are truthful and accurate.

- D. Neither the report nor the questionnaire will be made a part of the individual's personnel file. The report and the completed questionnaire will be treated as confidential except for use by the Compliance Officer, the Compliance Committee, and management to assist them in evaluating ways to improve the operations of Pafford EMS, or to the extent Pafford EMS may be required by law to report the information. The information shall be retained by Pafford EMS, and used for improving future employee-employer relationships, to identify potential improper conduct by others in the organization as well as to improve the quality of services rendered to patients and the public.
- E. After reviewing the report or questionnaire, the Compliance Officer may follow-up with the individual to attempt to secure any additional information that may help Pafford EMS pursue and address matters identified by the individual.
- F. It is expected that all employees be thorough and candid in answering these questions.

Solicitation, Distribution of Literature, and Use of Bulletin Boards

Purpose:

To avoid distractions and unnecessary interruptions during work-time, and to avoid excessive clutter at our work sites.

Policy:

Pafford EMS prohibits solicitation of one employee by another employee during working time, and distribution of unauthorized literature during working time and in work areas.

Procedure:

I. Solicitation.

- A. Personnel are prohibited from solicitation while on “working time.”
 - 1. “Working time” is defined as all time when an employee is expected to be performing job functions, but does not include an employee's own time, or break time, or designated rest time or when not engaged or required to be engaged in work activities.
 - 2. To avoid disturbing patients and others, solicitation is prohibited at all times in any patient care areas, including in any vehicle in which a patient is on board, or at the scene of an incident.

II. Distribution of Literature.

- A. Employees are not permitted to distribute advertising material, handbills, printed or written literature of any kind during working time or in the work areas, including in any Pafford EMS vehicles.

III. Solicitation/Distribution by Non-Employees.

- A. Solicitation, distribution of literature, or trespassing on the premises by persons other than employees is prohibited at all times.

IV. Use of Bulletin Boards.

- A. Official Company bulletin boards (physical and electronic) are an important means of communicating business information of interest and importance.
- B. Personnel should regularly check these Company boards for important announcements, schedule changes, continuing education classes, and so forth.

- C. These bulletin boards are for items of interest to Pafford EMS that are specifically related to Company workplace activities. Only management may post materials on the bulletin boards. These boards are not to be used for any personal postings, fundraising activities, political views, or any other non-Company related issues.
- D. Personnel shall not post or remove any material from Pafford EMS bulletin boards without permission from a supervisor.

Section 4: OSHA/Safety Policies - All Personnel

Infectious Disease Prevention & Education

Purpose:

To provide a safe work environment for all personnel, patients, and others by limiting our exposure to infectious disease and to appropriately deal with exposures that do occur.

Policy:

Pafford EMS expects all personnel to follow the “Exposure Control Plan” that has been developed, as well as all other safety reporting and training standards to minimize or eliminate instances of exposure to blood borne pathogens and other contaminants or diseases and to otherwise prevent injury in the workplace.

Procedure:

I. Infectious Disease Prevention.

- A. Pafford EMS has implemented an “Exposure Control Plan” (“Plan”) that is consistent with Occupational Safety & Health Administration (OSHA) standards. This Plan also includes relevant safety Policies, as required under the Plan.
- B. Relevant exposure and safety areas addressed in the Plan include, but are not limited to:
 - Universal precautions.
 - Sharps disposal (engineering controls).
 - Personal protective equipment.
 - Disposal of regulated waste.
 - Disposal of contaminated linens.
 - Proper use of labels.
 - Exposure reporting requirements.
- C. All personnel shall follow exposure requirements and reporting obligations as outlined in full in the “Exposure Control Plan.”

II. Education and Training.

- A. Pafford EMS shall conduct, on a regular basis, various training and educational sessions regarding blood borne pathogens, contractions of illness, safety and universal precautions procedures, and other such trainings on topics required or recommended by federal and state safety and regulatory agencies.
- B. Pafford EMS shall provide important safety and health information (e.g. OSHA updates and state Department of Health findings and publications regarding illness,

blood borne pathogens, and infectious disease control) on designated bulletin ELTs, through personnel publications, and by other means.

- C. Education and training is critical for the safety of all personnel and patients that Pafford EMS treats. It is critical that all personnel be involved in the training related to exposure control and proper use and disposal of instruments and gear, to prevent contamination, hazards, or otherwise compromise the health and safety of personnel or patients. Failure to attend mandatory training sessions can lead to discipline.

Workplace Safety & Safety Committee

Purpose:

To maintain a safe working environment staff members participating in reporting and preventing injuries is essential.

Policy:

Pafford EMS fosters a safe work environment, free from unsafe or dangerous activities, and has created a Safety Committee to coordinate safety training and provide input on safety related issues. Staff members are expected to promptly report unsafe conditions.

Procedure:

I. Standards.

- A. Workplace safety is of utmost concern to Pafford EMS. Personnel and patients alike must be protected from unsafe conditions.
- B. Personnel shall always act in a professional manner, especially during patient contact. Horseplay or inattention to work assignments or patient care will not be tolerated.
- C. Our jobs require rapid response, but this response must be a safe response. Reckless driving to arrive at a scene is not permitted, as dangerous driving can pose a danger to personnel and other persons.

II. Reporting Unsafe Conditions.

- A. Personnel must immediately report any unsafe condition to a supervisor. This includes unsafe storage or use of equipment, instances of horseplay, or unsafe driving or other dangerous activities that may pose a danger to patients and others.
- B. Personnel who violate safety standards, who cause hazardous or dangerous situations, or who fail to report (or, where appropriate, remedy) such situations, may be subject to disciplinary action, up to and including termination.
- C. Where reports of unsafe situations are made in an honest manner, reprisals against reporters will not be tolerated whether or not a violation is found, or discipline against a violator occurs.

III. Safety Committee.

- A. Pafford EMS has created a Safety Committee that is responsible for reviewing safety requirements, learning about safety updates (e.g., OSHA publications and warnings), reviewing safety-related incidents, providing recommendations for

safety improvements, and assisting with the training of staff as to proper safety procedures.

- B. The Safety Committee will entertain feedback on safety related issues that need to be explored and focused upon, and will take further guidance from the materials outlined in the “Exposure Control Plan.”

Exposure Control/Infectious Disease Prevention – Purpose of the Plan

Purpose:

One of the major goals of the Occupational Safety and Health Administration (OSHA) is to regulate facilities where work is carried out...to promote safe work practices in an effort to minimize the incidence of illness and injury experienced by Firefighters / EMS personnel. Relative to this goal, OSHA has enacted the Bloodborne Pathogens Standard, codified as 29 CFR 1910.1030. The purpose of the Bloodborne Pathogens Standard is to “reduce occupational exposure to Hepatitis B Virus (HBV), Human Immunodeficiency Virus (HIV), and other blood borne pathogens” that members may encounter in their workplace. OSHA has also enacted the Guidelines for Preventing the Transmission of Mycobacterium Tuberculosis in Healthcare Facilities, 1994; Notice, whose purpose is “to review the mode and risk of tuberculosis (TB) transmission in healthcare facilities and to make recommendations for reducing the risk of transmission to healthcare workers, patients, visitors, and other persons in these settings.”

Policy:

There are a number of general principles that should be followed when working with blood borne and airborne pathogens. These include that:

- It is prudent to minimize all exposure to blood borne and airborne pathogens.
- Risk of exposure to blood borne and airborne pathogens should never be underestimated.
- Our Company should institute as many work practice and engineering controls as possible to eliminate or minimize employee exposure to blood borne and airborne pathogens.

Pafford EMS has implemented this Exposure Control Plan (the “Plan”) to meet the letter and intent of the OSHA Bloodborne Pathogens Standard as well as the Guidelines for Preventing the Transmission of Mycobacterium Tuberculosis in Healthcare Facilities, 1994; Notice.

The objective of this Plan is twofold:

- To protect employees from the health hazards associated with blood borne and airborne pathogens.
- To provide appropriate treatment and counseling should an employee be exposed to blood borne and airborne pathogens.

Procedure:

I. General Program Management.

A. Responsible Persons

There are four major “categories of responsibility” that are central to the effective implementation of the Exposure Control Plan. These are:

- The “Health and Safety Officer” (Safety Officer)
- Chief(s) / Captain(s)
- Education/Training Officers
- All Employees

The following sections define the roles played by each of these groups in the implementation of the Plan. (Throughout this written Plan, members with specific responsibilities are identified.)

1. Health & Safety Officer

The “Health & Safety Officer” will be responsible for overall management and support of our Company’s Bloodborne and Airborne Pathogens Compliance Program. Activities which are delegated to the Health & Safety Officer typically include, but are not limited to:

- Overall responsibility for implementing the Exposure Control Plan for the entire company.
- Working with management and other employees to develop and administer any additional blood borne and airborne pathogens related policies and practices needed to support the effective implementation of this Plan.
- Looking for ways to improve the Exposure Control Plan, as well as to revise and update the Plan when necessary.
- Collecting and maintaining a suitable reference library on the Bloodborne Pathogens Standard and bloodborne and airborne pathogens safety and health information.
- Knowing current legal requirements concerning blood borne and airborne pathogens.
- Acting as company liaison during OSHA inspections.
- Conducting periodic company audits to maintain an up-to-date Exposure Control Plan.

2. Chiefs, Captains, & Lieutenants

Company managers and officers are responsible for exposure control in their respective areas. They work directly with the Health and Safety Officer and all employees to ensure that proper exposure control procedures are followed.

3. Education/Training Officer

The Education / Training Officer will assist in providing information and training to all employees who have the potential for exposure to blood borne and airborne pathogens.

Activities for which the Education/Training Officer is responsible:

- Maintaining an up-to-date list of company personnel requiring training (in conjunction with management).
- Developing suitable education/training programs.
- Scheduling periodic training seminars for members.
- Maintaining appropriate training documentation such as “sign-in sheets”, quizzes, etc.
- Periodically reviewing the training programs with the Health & Safety Officer, Chiefs and other officers to include appropriate new information.

4. Employees

As with all of our Company’s activities, the Employees have the most important role in the bloodborne and airborne pathogens compliance program. The ultimate execution of much of the Exposure Control Plan rests in their hands. In this role, they must do things such as:

- Know what tasks they perform that have occupational exposure.
- Attend the blood borne and airborne pathogens training sessions.
- Plan and conduct all operations in accordance with established work practice controls.
- Develop good personal hygiene habits.

B. Availability of the Exposure Control Plan to Employees

The Exposure Control Plan has been placed in this Personnel Handbook to ensure that it is not only readily available to all Employees, but to ensure that all Employees are familiar with its contents.

C. Review and Update of the Exposure Control Plan

Pafford EMS recognizes that it is important to keep the Plan up-to-date. To ensure this, the Plan is reviewed and updated by the Health and Safety Officer and in conjunction with the Safety Committee under the following circumstances:

- Annually.
- Whenever new or modified tasks and procedures are implemented which affect occupational exposure of employees.
- Whenever employees’ jobs are revised such that new instances of occupational exposure may occur.
- Whenever any new functional positions are established within Pafford EMS that may involve exposure to blood borne and airborne pathogens.

II. Potential Exposure Determination.

- A. Key to implementing a successful Exposure Control Plan is to identify exposure situations which members may encounter and to identify classes of employees who differ in degrees of exposure potential. As such, Pafford EMS utilizes the following categories:
 - Job classifications in which all members/employees have occupational exposure to blood borne and airborne pathogens.
 - Job classifications in which some members/employees have occupational exposure to bloodborne and airborne pathogens.
 - Tasks and procedures in which occupational exposure to blood borne and airborne pathogens occur (these tasks and procedures are performed by employees in the job classifications shown on the two previous lists).
- B. Lists are revised and updated during the annual review of the Plan or as applicable throughout the year.
- C. Ask the Health and Safety Officer for a complete listing.

III. Methods of Compliance. Procedures which are utilized to effectively eliminate or minimize exposure to blood borne and airborne pathogens in Pafford EMS are:

- The use of universal precautions;
- The establishment of appropriate engineering controls;
- The implementation of appropriate work practice controls;
- The use of necessary personal protective equipment; and
- The implementation of appropriate housekeeping procedures.

Each of these areas is reviewed with employees during their blood borne and airborne pathogens-related training. By rigorously following the requirements of OSHA's Bloodborne Pathogens Standard and the Guidelines for Preventing Transmission of Mycobacterium Tuberculosis in Healthcare Facilities, 1994; Notice, employees' occupational exposure to bloodborne and airborne pathogens are eliminated or minimized.

A. Universal Precautions

1. Pafford EMS utilizes the practice of "Universal Precautions." That is, all human blood and body fluids are treated as if they are known to be infectious for HBV, HIV and other blood borne pathogens.
2. In circumstances where it is difficult or impossible to differentiate between body fluid types, all body fluids are assumed to be potentially infectious.
3. The Health & Safety Officer is responsible for overseeing Pafford EMS's universal precautions program.

B. Engineering Controls

1. One of the key aspects to the Exposure Control Plan is the use of engineering controls to eliminate or minimize employee exposure to blood borne and airborne pathogens. These controls reduce employee exposure by either removing or isolating the hazard or isolating the worker from exposure.
2. The Health and Safety Officer in conjunction with the Safety Committee will review the tasks and procedures where engineering controls can be implemented or updated. During the annual Exposure Control Plan review, Pafford EMS defines and evaluates procedures for new or improved controls.
3. The following engineering controls are used throughout our Company:
 - Hand washing facilities (antiseptic hand cleaners and towels) which are readily accessible to all employees
 - Containers for contaminated reusable sharps having the following characteristics:
 - puncture-resistant
 - color-coded or labeled with biohazard warning label
 - leak-proof on the sides and bottom
 - Specimen containers which are:
 - leak-proof
 - color-coded or labeled with biohazard warning label
 - puncture-resistant, when necessary
 - Secondary containers which are:
 - leak-proof
 - color-coded or labeled with biohazard warning label
 - puncture-resistant, if necessary

C. Work Practice Controls

1. Pafford EMS uses a number of work practice controls to help eliminate or minimize employee exposure to blood borne and airborne pathogens. These work practice controls alter the manner in which a task is performed.
2. The employee of Pafford EMS who is responsible for overseeing the implementation of these work practice controls is the Health and Safety Officer. This Officer works in conjunction with the Safety Committee.
3. Pafford EMS has adopted the following work practice controls as part of its Blood borne and Airborne Pathogens Compliance Program:

- Employees wash their hands immediately, or as soon as feasible, after removal of potentially contaminated gloves or other personal protective equipment.
- Following any contact of body areas with blood or any other infectious materials, employees wash their hands and any other exposed skin with soap and water as soon as possible.
- Contaminated back boards are left at the receiving hospital for proper cleaning.
- Contaminated needles and other contaminated sharps are not bent, recapped or removed unless:
 - It can be demonstrated that there is no feasible alternative;
 - The action is required by specific medical procedure; and
 - In the two situations above the recapping or needle removal is accomplished through the use of a medical device or a one-handed technique.
- Contaminated reusable sharps are placed in appropriate containers immediately, or as soon as possible, after use.
- Eating, drinking, smoking, applying cosmetics or lip balm and handling contact lenses is prohibited in work areas where there is potential for exposure to blood borne and airborne pathogens.
- Food and drink are not kept in areas where blood or other potentially infectious materials are present.
- All procedures involving blood or other infectious materials shall be designed to minimize splashing, spraying or other actions generating droplets of these materials.
- Specimens of blood or other materials are placed in designated leak-proof containers, appropriately labeled, for handling and storage.
- If outside contamination of a primary specimen container occurs, that container is placed within a second leak-proof container, appropriately labeled, for handling and storage. (If the specimen can puncture the primary container, the secondary container must be puncture-resistant as well.)
- Equipment which becomes contaminated is examined prior to servicing or shipping, and decontaminated as necessary (unless it can be demonstrated that decontamination is not feasible).
 - An appropriate biohazard warning label is attached to any contaminated equipment, identifying the contaminated portions.
 - Information regarding the remaining contamination is conveyed to all affected employees, the equipment manufacturer and the equipment service representative prior to handling, servicing or shipping.

D. Personal Protective Equipment

1. Personal protective equipment also must be used if potential occupational exposure remains after instituting engineering and work practice controls. This equipment is the staff member's "last line of defense" against blood

borne and airborne pathogens. Personal protective equipment that any employees need is provided by Pafford EMS at no expense to the employee. This equipment includes, but is not limited to:

- gowns
- gloves
- masks (respirator for known, or suspected TB patients)
- goggles
- disposable coveralls

2. The Safety Officer working with the Safety Committee is responsible for ensuring that all Company work areas have appropriate personal protective equipment available employees.
3. Employees are trained regarding the use of the appropriate personal protective equipment for their job classifications and tasks/procedures they perform.
4. To ensure that personal protective equipment is not contaminated and is in the appropriate condition to protect staff members from potential exposure, Pafford EMS adheres to the following practices:
 - All personal protective equipment is inspected periodically and repaired or replaced as needed to maintain its effectiveness.
 - Reusable personal protective equipment is cleaned, laundered and decontaminated as needed.
 - Single-use personal protective equipment (or equipment that cannot, for whatever reason, be decontaminated) is disposed of by forwarding that equipment to the receiving hospital.
5. To make sure that this equipment is used as effectively as possible, employees are trained to adhere to the following practices when using their personal protective equipment:
 - Any garments penetrated by blood or other infectious materials are removed immediately, or as soon as feasible. If the garment is conspicuously soiled, it will be placed in a container red in color or labeled with the appropriate biohazard warning label. It will then be cleaned by a professional laundry at the expense of Pafford EMS.
 - All potentially contaminated personal protective equipment is removed prior to leaving a work area.
 - Gloves are worn in the following circumstances:
 - Whenever employees anticipate hand contact with potentially infectious materials.
 - When handling or touching contaminated items or surfaces.

- Disposable gloves are replaced as soon as practical after contamination or if they are torn, punctured or otherwise lose their ability to function as an “exposure barrier”.
- Masks and eye protection (such as goggles, face shields, etc.) are used whenever splashes or sprays may generate droplets of infectious materials.
- Protective clothing (such as coats) is worn whenever potential exposure to the body is anticipated.

E. Housekeeping

1. The maintenance of Company property in a clean and sanitary condition is an important part of the Blood borne and Airborne Pathogens Compliance Program.
2. The following practices are utilized:
 - All equipment and surfaces are cleaned and decontaminated after contact with blood or other potentially infectious materials:
 - After the completion of medical procedures.
 - Immediately (or as soon as feasible) when surfaces are overtly contaminated.
 - After any spill of blood or infectious materials.
 - At the end of the work shift if the surface may have been contaminated during that shift.
 - Protective coverings (such as plastic trash bags or wrap, aluminum foil or absorbent paper) are removed and replaced:
 - As soon as it is feasible when overtly contaminated.
 - At the end of the work shift if they may have been contaminated during the shift.
 - All trash containers, pails, bins, and other receptacles intended for use are routinely inspected, cleaned and decontaminated as soon as possible if visibly contaminated.
 - Potentially contaminated broken glassware is picked up using mechanical means (such as dustpan and brush, tongs, forceps, etc.).
 - Contaminated reusable sharps are stored in containers that do not require “hand processing”.
3. The following procedures are used when handling all types of regulated waste including used bandages, feminine hygiene products, and other potentially infectious material:
 - Regulated waste materials are discarded or “bagged” in containers that are:
 - Closeable
 - Puncture-resistant if the discarded materials have the potential to penetrate the container.

- Leak-proof if the potential for fluid spill or leakage exists.
 - Red in color or labeled with the appropriate biohazard warning label.
 - Containers for this regulated waste are placed in appropriate locations within easy access of personnel and as close as possible to the sources of the waste.
 - Waste containers are maintained upright, routinely replaced and not allowed to overfill.
 - Contaminated laundry will be handled as little as possible and must be disposed of in the appropriate receptacles at the hospitals.
 - Whenever personnel move containers of regulated waste from one area to another, the containers are immediately closed and placed inside an appropriate secondary container if leakage is possible from the first container.
4. All contaminated waste will be disposed of at a healthcare facility.

F. Labeling

1. Fluorescent orange or orange-red warning labels will be attached to containers of regulated waste.
2. These labels are not required when red bags or red containers are used.
3. The warning label will also contain the biohazard symbol and the word BIOHAZARD, in a contrasting color.
4. The label will be attached to each object by string, wire, adhesive, or other method to prevent loss or unintentional removal of the label.

IV. Labels and Signs

- A. One of the most obvious warnings of possible exposure to blood borne and airborne pathogens are biohazard labels. Accordingly, Pafford EMS has implemented a comprehensive biohazard warning labeling program using labels of the type shown below, or when appropriate, using red “red-coded” containers.
- B. The following items are subsequently labeled:
- Containers of regulated waste
 - Sharps disposal containers
 - Other containers used to store, transport or ship blood or other infectious materials
 - Laundry bags and containers
 - Contaminated equipment

- C. Labels affixed to contaminated equipment also indicate which portions of the equipment are contaminated.

Vaccination Policy

Purpose:

To help protect personnel, patients and families from contracting or transmitting Hepatitis B, seasonal Influenza, or COVID-19.

Definition:

EMS staff include any and all personnel staffing the ambulances or wheelchair vans, or engaging in patient care and/or patient transportation activities.

Policy:

Pafford EMS encourages vaccination of EMS staff against Hepatitis B and season Influenza, and requires all personnel to be vaccinated against COVID-19, absent an approved request for accommodation.

Procedure:

I. Hepatitis B and Influenza:

- A. EMS staff are encouraged to obtain and provide proof of a Hepatitis B vaccination unless (1) antibody testing reveals that the staff member is immune, or (2) medical evaluation shows that vaccination is contraindicated. Likewise, all personnel are encouraged to obtain and provide proof of the influenza vaccination annually, unless medically contraindicated.
- B. Pafford EMS will provide an influenza vaccination annually for all staff free of charge. Pafford EMS will not reimburse employees who voluntarily obtain an influenza vaccination from another source.
- C. EMS staff who decline to get the Hepatitis B and/or Influenza vaccination must complete the declination form provided in Pafford EMS's onboarding documents, acknowledging refusal to receive one or both of the vaccinations.

II. COVID-19:

- A. Personnel are required to present valid proof of COVID-19 vaccination.
- B. Personnel who have a medical or religious need to be excused from the COVID-19 vaccination requirement may obtain forms to request a reasonable accommodation from the Human Resources Department. Such forms should be completed and returned as soon as possible. Additional information may be sought supporting the requested accommodation.

III. Mitigation Measures

Personnel who decline to get a required or recommended vaccination, or who are granted an exception, must observe other mitigation measures as required by Pafford EMS.

Infection Control Program

Purpose:

The purpose of this Infection Control Program is: (1) to provide a comprehensive infection control system which maximizes protection against communicable diseases for all members, employees, and for the public that we serve, and (2) to protect all ambulance personnel, in the course of their duties as emergency medical personnel, from infectious diseases borne in the body fluids of patients, most particularly in blood.

Policy:

It is to be assumed that all patients are potential carriers of infectious diseases. While blood is of the utmost concern, body fluids referred to hereafter shall include, but not be limited to semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva, and body fluids visibly contaminated with blood.

Procedure:

I. Standards.

- A. This Infection Control Program affects all personnel during emergency responses and routine transports.
 - 1. The precautions shall be implemented without regard to a patient's diagnosis and all patients shall be assumed to be the carrier of an infectious disease.
 - 2. All personnel involved with patient care in any aspect are required to comply with these precautions. These personnel include, but are not limited to Paramedics, EMTs, EMS Vehicle Operators, Wheelchair Van Operators, Attendants, trainees, and any other personnel assisting with patients.
 - 3. Personnel from other organizations are required to comply with their own organizational procedures or Pafford EMS procedures.
 - 4. This Policy applies to all employees as well as anyone else providing emergency or non-emergency medical services on behalf of Pafford EMS.
- B. Pafford EMS recognizes that communicable disease exposure is an occupational health hazard. Communicable disease transmission is possible during any aspect of emergency response, including in-station operations.
 - 1. The health and welfare of each staff member is a joint concern of the everyone involved with this Company.
 - 2. While each staff member is ultimately responsible for his or her own health,

Pafford EMS recognizes a responsibility to provide as safe a workplace as possible.

3. The goal of this program is to provide all staff members with protection from occupationally acquired communicable disease.

C. It is the Policy of Pafford EMS:

1. To provide emergency medical services to the public without regard to known or suspected diagnosis of communicable disease in any patient.
2. To regard all patient contacts as possibly infectious. Standard precautions will be observed at all times and will be expanded to include all body fluids and other potentially infectious material. All personnel shall routinely use appropriate barrier precautions to prevent skin and mucus membrane exposure when contact with blood or body fluids is anticipated.
3. To provide all staff members with the necessary training, immunizations, and personal protective equipment (PPE) needed for protection from communicable diseases.
4. To recognize the need for work restrictions based on infection control concerns.
5. To prohibit discrimination of any staff member for health reasons, including infection and/or seroconversion with HIV/HBV virus.
6. To regard all medical information as confidential. No staff member's health information will be released except in compliance with all federal and state laws protecting the confidentiality of personnel medical records.

II. Personal Protection.

- A. Approved Gloves must be worn when there is any possibility of contact with blood or other potentially infectious materials.
 1. Double gloving is recommended when there is a potential for contact with large amounts of blood or body fluids.
 2. Leather work gloves should not be worn when directly handling a patient with obvious body fluids.
- B. Face/Eye Protection must be worn when there is any possibility of splashing, spraying, or splattering of blood or other potentially infectious materials.
 1. If goggles are splashed during procedure, cleanse with disinfectant.

2. A protective mask must be worn whenever there is the possibility of a patient's bodily fluid splashing into the nose or mouth.
- C. Fluid-Resistant Gowns must be worn while performing procedures likely to generate splashes of blood or body fluids.
- D. Clothing to be worn should include long-sleeved shirts whenever possible. No shorts are to be worn at any time.

III. Engineering Controls.

- A. Engineering and work practice controls will be used to eliminate or minimize any exposure to blood or body fluids by staff members.
- B. Biohazard containers shall be clearly marked and placed on each ambulance.
 1. Contaminated disposable materials must be discarded in biohazard container only in the ambulance or the receiving hospitals.
- C. Used intravenous needles and syringes shall not be recapped or covered.
 1. They shall be disposed of directly into an appropriate biohazard container.
 2. Do not break or bend needles prior to placing into sharps container.
 3. If personnel feel it is safer to recap, it must be done with the one hand method or hemostats.
- D. Contaminated materials shall not be left at the scene if at all possible.
- E. On calls where a patient is known to have or suspected of having an infectious disease, personnel contact with the patient should be kept to the minimum needed to provide appropriate patient care or transport.
 1. Trainees and other non-essential personnel should avoid direct contact with the patient.
- F. All efforts should be made to contain bio-wastes.
 1. Avoid throwing gauze, needles, and contaminated clothing or towels on the floor or bench seat of the ambulance.
 2. Bags have been provided in the ambulance for this purpose.

IV. Personal Hygiene.

- A. Ambulance personnel must continue to wear gloves until all contaminated equipment and materials have been cleaned or discarded, and until all contaminated linens have been discarded.
 - 1. Personnel wearing protective masks or goggles must remove them prior to removing gloves.
 - 2. Gloves and goggles must be worn during all cleaning or decontamination, and while handling biohazard waste bags and needle containers.
- B. Ambulance personnel must wash their hands and wrist areas with an anti-bacterial soap immediately following removal of gloves, and prior to handling clean linens or equipment and supplies.
- C. Eating, drinking, smoking, applying cosmetic lip balms and handling contact lenses are prohibited in work areas where there is a reasonable likelihood of occupational exposure.
- D. Open food containers are prohibited in the patient compartment of ambulances.
- F. Clothing that has become contaminated must be washed. Personnel that choose to wash soiled clothing at home must bag contaminated clothing separate from other apparel and should wash such clothing separate from other clothing.

V. Decontamination and Disposal.

- A. For most decontamination and cleaning purposes, a 10% solution of bleach or other commercial anti-bacterial cleaner shall be used.
- B. A bottle of bleach and a can of disinfectant spray shall be kept in each ambulance.

Ambulance interiors and equipment which has been contaminated with bodily fluids shall be cleaned immediately following the conclusion of a call and prior to responding to another call.
- C. Needles and other sharps must be disposed of at the receiving facility in approved containers.

If at all possible, no contaminated waste should be brought into the station.
- D. Needle disposal boxes shall be checked biweekly and replaced as needed at the hospital.

VI. Training.

- A. Training must contain a copy of the OSHA Regulations regarding occupational exposure to blood borne pathogens. These will include the following:
 - 1. An explanation of the use and limitation that will prevent or reduce exposure including appropriate engineering controls, work practices, and personal protective equipment.
 - 2. Information on types, proper uses, location, removal, handling, decontamination, and disposal of personal protective equipment.
 - 3. Information on the Hepatitis B Vaccine, information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine and the vaccination will be offered free of charge.
 - a. All personnel must begin a series of inoculations for Hepatitis B prior to rendering direct patient care, or sign a Declination Form within ten (10) days of assignment on an ambulance.
 - b. Personnel initially refusing such inoculations may choose to receive the inoculations at a later date.
 - 4. Information concerning the appropriate actions to take and persons to contact in an emergency involving blood or other potentially infectious materials.
 - 5. An explanation of the procedure to follow if an exposure occurs, including the method of reporting the incident and medical follow-up that will be made available.
- B. If you have any questions on any aspect of our Infection Control Program, please see the Health and Safety Officer.

VII. Body Substance Isolation/Universal Precautions.

- A. Wear gloves on all calls where patient contact is required and when cleaning areas or equipment contaminated with blood or other body fluids.
- B. Wash your hands often and after every call.
- C. Use face masks, gowns, goggles, or face shields when spraying or splashing of body fluids is possible.
- D. Utilize pocket masks or bag-valve-masks when ventilating a patient.
- E. Thoroughly clean and disinfect equipment after each use following Center for

Disease Control guidelines.

- F. Place all disposable equipment and contaminated trash in a clearly marked plastic red biohazard bag and dispose of appropriately.
- G. Contaminated uniforms and clothing should be removed, placed in an appropriately marked red biohazard bag and laundered / decontaminated.

Exposure Control Plan

Purpose:

The purpose of this Exposure Control Plan is to identify those tasks and corresponding job classifications for which it can be reasonably anticipated that an exposure to blood, other body fluids, or other potentially infectious materials may occur, to establish a schedule for implementation of Pafford EMS's Infection Control Program, to identify the procedure for the evaluation of circumstances surrounding exposure incidents, and to reduce the likelihood of occupational exposure to blood or other potentially infectious materials to personnel of Pafford EMS. This will be accomplished by providing worksite training, personal protective equipment, engineering and work practice controls, Hepatitis B vaccinations, appropriate housekeeping practices, medical surveillance, and signs and labels. These procedures are designed to reduce and/or eliminate the potential for exposure to blood borne pathogens due to percutaneous injuries from contaminated sharps, and to reduce and/or eliminate potential transmission of the Human Immunodeficiency Virus (HIV), the Hepatitis B Virus (HBV) and other blood borne pathogens, and to protect the health and safety of members and employees.

On December 6th, 1991, the US Company of Labor, Occupational Safety and Health Administration (OSHA) published *Occupational Exposure to Blood borne Pathogens*. This standard affects Pafford EMS and requires, among other measures, that a formal exposure control plan be written.

On November 6th, 2000, President Clinton signed the Needle stick Safety and Prevention Act, Pub. L. 106-430. This Act required OSHA to revise the blood borne pathogen standard within six months of the Act's enactment. Pursuant to this Act, OSHA published changes to the blood borne pathogen standard on January 18, 2001. The revisions clarify the need to select safer needle devices as they become effective, to involve employees in identifying and choosing the devices, and to maintain a log of injuries from contaminated sharps.

Program Management:

I. Introduction.

- A. The OSHA Blood borne Pathogens Standard, 29 CFR § 1910.1310, requires, among other things, a comprehensive Exposure Control Plan, the consideration and selection on an annual basis of safer needle devices as they become effective, personnel involvement in identifying and choosing these devices, and the maintenance of a confidential log of injuries from contaminated sharps.
- B. The Exposure Control Plan will be reviewed and updated at least annually.
- C. To comply with this requirement, a Management System has been developed to administer the Exposure Control Plan.

II. Management System and Personnel Responsibilities. There are two components to the Management System of the program. First is the assignment of a *Health and Safety Officer*. Second is the establishment of a *Safety Committee*.

A. Health and Safety Officer

1. The Exposure Control Plan is administered by the Health and Safety Officer. The Safety Committee is responsible for administration of, and overall compliance with, the OSHA Blood borne Pathogens Standard. Specific responsibilities include:
 - Implementing the Exposure Control Plan throughout the facility
 - Reviewing the Exposure Control Plan at least annually, making revisions where necessary
 - Knowing current requirements of the Blood borne Pathogens Standard
 - Acting as liaison to OSHA with regard to this Standard
 - Ensuring the presence of an ongoing employee/member training program
 - Reviewing requirements for personal protective equipment, engineering controls, work practice controls and labeling
 - Maintaining a list of job classifications/tasks in which occupational exposure may occur
 - Interviewing members and employees at least annually to assist in identifying and selecting safer needle and related devices, and documenting such interviews in the Exposure Control Plan
 - Maintaining a confidential log of injuries from contaminated sharps
 - Considering and selecting safer needle and related devices on an annual basis
2. The Health and Safety Officer is supported by all administrative personnel at the workplace. Each officer at Pafford EMS assures that all personnel are in compliance with the Exposure Control Plan.

B. Safety Committee

1. A Safety Committee has been established. The committee is responsible for assisting the Health and Safety Officer in ensuring compliance with the Blood borne Pathogens Standard. Responsibilities of the committee include:
 - Meeting regularly to review reports and make recommendations
 - Reviewing and revising the Exposure Control Plan
 - Reviewing the *Work Practice Survey*
 - Reviewing the *Engineering Control Survey*
 - Reviewing any member/employee injury or exposure involving blood borne pathogens

- Reviewing any incidents in which exception to the Personal Protective Equipment occurred.

III. Personnel Training.

- A. All personnel who have been identified as having occupational exposure to Blood borne pathogens will receive routine training.
- B. Training will be provided to all staff annually. It will also be provided to each new staff member within ten working days from the start of his or her probationary/introductory period.
- C. The Safety Committee will conduct the training. Records will be maintained by the Health and Safety Officer.
- D. A description of the content of the training program can be found in these materials.

IV. Personnel Involvement.

- A. A representative sampling of non-managerial staff members identified as having occupational exposure to blood borne pathogens will be interviewed annually to solicit their opinions in identifying and evaluating and selecting effective engineering and work practice controls.
- B. Such solicitations shall be documented and maintained with Pafford EMS's Exposure/Infection Control records.

V. Personnel Injuries from Contaminated Sharps.

- A. All personnel who receive a percutaneous injury from a contaminated sharp shall see the Health and Safety Officer immediately to record in the Sharps Injury Log:
 - 1. The type and brand of device involved in the accident,
 - 2. The work area where the incident occurred, and
 - 3. An explanation of how the injury occurred.

VI. Personnel Information.

- A. A copy of the complete OSHA Standard and this Exposure Control Plan is available upon request to all personnel.
- B. Any staff member who wishes to review this information may do so.
- C. To make these arrangements, the staff member must contact the Health and Safety Officer.

Exposure Determination:

I. Introduction.

- A. A review of routine and reasonably anticipated tasks has been completed and determinations have been made regarding the possibility of exposure to blood and other potentially infectious materials.
- B. These determinations are based on *Job Classifications* of staff members who are exposed to these materials, both on a routine and an occasional basis.
- C. *Job Tasks*, which may create an occupational exposure, have also been identified.

II. Identification of Job Classifications.

- A. Routine Exposure: The following tasks are reasonably anticipated to involve exposure to blood, body fluids, or other potentially infectious materials:
 - 1. Provisions of emergency medical care to injured or ill patients
 - 2. Response to hazardous materials emergencies involving potentially infectious substances
 - 3. Training, as in CPR, first aid, etc.
 - 4. Rescue of victims from hostile environments, including burning structures or vehicles, water-contaminated atmospheres, or oxygen-deficient atmospheres.
 - 5. Extrication of persons from vehicles, machinery, or collapsed excavations or structures.
 - 6. Recovery and/or removal of bodies from any situation cited above.
- B. The following job classifications are reasonably anticipated to involve exposure to blood, body fluids, or other potentially infectious substances in the performance of their duties:
 - 1. Job Classifications with High Probability of Contact with Infectious Substances:
 - Paramedic
 - Emergency Medical Technician (EMT)
 - Supervisor
 - EMS Vehicle Operator
 - Trainee
 - All other EMS Personnel

- All other Personnel Assisting with Patients

2. Job Classifications with Low to Moderate Probability of Contact with Infectious Substances:

- Administrative staff
- Billing staff
- Firefighters
- Maintenance
- Office Staff
- Student Interns/Observers

III. Identification of Job Tasks – For job classifications with a high probability of infectious substances:

- A. Patient care
- B. Rescues
- C. Firefighting
- D. Cleaning and restoring of vehicles and equipment
- E. Medical waste disposal
- F. Training
- G. Follow-up care
- H. Laundry

IV. Hours and Distribution by Job Classification.

- A. All personnel are responsible 24 hours per day, 7 days a week for ensuring appropriate measures have been made to reduce the risk of exposure to themselves as well as other personnel.

Methods of Compliance:

I. Introduction.

- A. In order to provide the highest level of protection to members and employees, Pafford EMS uses universal precautions in combination with engineering controls, work practice controls and personal protective equipment.
- B. In addition, Pafford EMS adheres to specific housekeeping practices.

II. Universal Precautions.

- A. All personnel must use universal precautions in the performance of any task that may cause an occupational exposure.
- B. The use of universal precautions means that all blood and body fluids are treated as if they are contaminated with blood borne pathogens.
- C. Universal precautions involve applying a barrier between the staff member and potentially infectious materials.
- D. The barrier may involve utilizing engineering controls, work practice controls, personal protective equipment, or a combination of any of these.

III. Engineering Controls.

- A. Engineering Controls utilize available technology to isolate or remove possible blood borne hazards from contacting staff members.
- B. Available engineering controls have been installed in the ambulances and station. An example of these controls is the puncture resistant sharps disposal boxes.
- C. The Health and Safety Officer or his designee will maintain existing controls and keep current of new controls that are developed for consideration of implementation at this station.
- D. The Health and Safety Officer or his designee will also evaluate any areas where engineering controls are not currently used, but where they might prove beneficial.

IV. Work Practice Controls.

- A. These are adjustments in the manner in which tasks are performed.
- B. These alterations reduce the likelihood of exposure to blood or other potentially infectious materials.
- C. Work practice controls instituted at Pafford EMS are:
 - 1. Gloves will be used any time contact with a patient occurs or is anticipated.
 - 2. Hand washing will be performed after any patient contact, any contact with blood, body fluids or any other potentially infectious materials and after removing gloves or other personal protective equipment. Hand washing facilities are readily available in the Emergency Room and the station. Where hand washing facilities are not immediately present (the ambulance), alternate forms of skin cleansing with an alcohol based cleaner is available.

If these are used, hand washing with soap and running water will be carried out as soon as possible.

- a. During emergency care or other medical treatments where there is contact with other skin surfaces, washing with soap and running water will be carried out as soon as possible.
 - b. If a splash occurs to mucous membranes, these areas will be flushed with water as soon as possible.
3. Sharps will be placed in appropriate containers. Properly labeled puncture-resistant sharps containers are available on the ambulance, in the station and in the emergency room. If a staff member of Pafford EMS is required to handle a needle, it will not be re-capped, bent or broken. Once a needle has been used, it must be carefully placed into an appropriate sharps container. For needles temporarily placed aside, a one-handed recapping technique is used.
 4. Staff members must avoid eating, drinking, handling of contact lenses, storing food, and applying cosmetics and lip balm areas where reasonable potential for exposure to infectious materials exists. This includes the back of the ambulance.

D. Work practice controls are the responsibility of the Health and Safety Officer.

V. Personal Protective Equipment.

- A. Pafford EMS will designate a person to develop standards for personal protective equipment (PPE).
- B. Pafford EMS is responsible for the supply, replacement and safe disposal of all infection control PPE.
- C. The designated person will determine proper stock supply levels of PPE for the station and all vehicles.
- D. PPE is clothing or other specialized equipment used by staff members to protect themselves from direct contact with blood or other potentially infectious materials.
- E. The following PPE are readily available at no cost to staff members:
 1. Disposable latex gloves in various sizes
 2. Face shields, masks and eye protection
 3. Fluid resistant isolation suits

4. Resuscitation shields and other devices for CPR
- F. The PPE set forth in Paragraph e(1)-(4), above, will be replaced, cleaned or disposed of immediately at no cost to the staff member.
- G. PPE will be removed prior to leaving the scene and placed in an appropriate container.
- H. Personnel must wear PPE whenever contact with blood or potentially infectious materials is reasonably expected.
- I. Appropriate splash protection will be worn whenever splash of these materials is reasonably expected.
- J. During rescue operations, rubber gloves will be worn under leather rescue gloves.
- K. Personnel are permitted to use their professional judgment in rare circumstances when protective equipment temporarily cannot be used because the delay in applying equipment may cost a victim his/her life or when this delay would endanger Pafford EMS personnel.
 1. If this should occur, the Health and Safety Officer will investigate the incident to determine if similar circumstances can be avoided in the future.
- L. Contaminated PPE should be removed as soon as possible and placed in an appropriate container.
- M. Sharps containers will be closable, puncture-resistant, and leak proof.
- N. Replacement pocket masks will be carried on every response vehicle and stocked in the station.
- O. The provision of emergency medical services is often unpredictable and uncontrollable. While blood is the single most important source of HIV and HBV infection in the workplace, in the field it is safest to assume that all body fluids are infectious.
 1. For this reason, PPE will be chosen to provide barrier protection against all body fluids.
- P. No standard operating procedure or PPE ensemble can cover all situations. Common sense must be used.
 1. When in doubt, select maximal rather than minimal PPE.

- Q. Disposable latex gloves (or other appropriate and approved hypoallergenic alternative) will be worn during any patient contact when the potential exists for contact with blood, body fluids, non-intact skin, or other infectious material.
1. All personnel will carry extra pairs of disposable gloves with EMS gear.
- R. Gloves will be replaced as soon as possible when soiled, torn or punctured.
1. Hands must be washed after glove removal.
- S. Disposable latex gloves (or other appropriate and approved hypoallergenic alternative) will not be reused or washed and disinfected for reuse.
- T. Gloves should be changed between patients in multiple casualty situations.
1. Hands should be cleaned with disinfectant towelettes that should be immediately available.
- U. Structural firefighting gloves or leather gloves will be worn in situations where sharp or rough edges are likely to be encountered.
1. Latex gloves are to be worn in addition to either structural firefighting or leather gloves.
- V. Heavy-duty utility gloves may be used for the handling, cleaning and decontamination or disinfection of potentially contaminated patient care equipment.
- W. Facial protection will be used in any situation where splash contact with the face is possible.
1. Facial protection may be afforded by using both a facemask and eye protection, or by using a full-face shield.
 2. When treating a patient with a suspected or known transmissible disease, a facemask will be used.
 3. The first choice is to mask the patient. If this is not feasible, mask the Pafford EMS staff member.
- X. Fluid-resistant gowns are designed to protect clothing from splashes.
1. EMS jackets also protect clothing from splashes and are preferable in rescue, or vehicle extrication activities or at the scene of a fire. Gowns may interfere with, or present a hazard to, the employee/member in these circumstances.

2. The decision to use barrier protection to protect clothing, and the type of barrier protection used will be left to the staff member.
 3. EMS jackets and helmets will always be worn for vehicle extrications.
 4. Remember, leather cannot be cleaned if body fluids are splashed onto leather parts of gear.
- Y. Under certain circumstances, head covers and/or shoe covers will be required to protect these areas from potential contamination.
1. Structural firefighting gear (impervious boots, helmets) may also be used for barrier protection.
 2. EMS helmets may be used for head covers.
 3. If foot covers are needed, they will be stocked in the ambulances.

VI. Summary:

- A. If it is wet, it is infectious – use gloves.
- B. If it could splash onto your face, use eye shield and mask or full-face shield.
- C. If it is airborne, mask the patient and/or yourself.
- D. If it could splash your cloths, use a gown or EMS jacket.
- E. If it could splash on your head or feet, use appropriate barrier protection.

Hazard Communication Program

Purpose:

Pafford EMS developed this Hazard Communication Program to protect the right of its employees, ELT Members, and Officers to access information on the chemical and physical hazards of materials at Pafford EMS.

Policy:

Under this program, you will be informed of the contents of the OSHA Hazard Communications standard, the hazardous properties of the chemicals with which you work, safe handling procedures and measures to take to protect yourself from these chemicals.

Applicability:

This program applies to all operations at Pafford EMS where you may be exposed to hazardous chemicals under normal working conditions or during emergency situations. Everyone at Pafford EMS will participate in the Hazard Communication Program. Copies of the Hazard Communication Program are available in the office for review by any interested staff member.

Procedure:

I. Responsibilities

- A. The Health and Safety Officer is the program coordinator with overall responsibility for the program, including reviewing and updating this plan, as necessary.
- B. The Health and Safety Officer, as part of the Hazard Communication Program, shall:
 - 1. Maintain current chemical inventories and Material Safety Data Sheets (MSDS) files.
 - 2. Ensure compliance with container labeling requirements.
 - 3. Hazard Determination - Identification of physical hazards.
 - 4. Identification of new chemicals brought onsite that present new hazards requiring additional training. Then, add information to the chemical inventories and MSDS files.

II. Hazard Communication Program Elements

- A. The following program elements describe how the criteria specified by the OSHA Hazard Communications Standard shall be implemented and maintained. Hazard Communication Program elements include the following:
1. Hazard determination
 2. Hazard chemical inventory
 3. Labeling and containers
 4. MSDS
 5. Employee/member training
 6. Hazard communication

III. Hazard Determination

- A. Background
1. In most cases, the determination of chemical hazards will be based on information provided by chemical manufacturers.
 2. In situations where this is not possible, a hazard determination shall be conducted by the organization based on criteria established in Appendices A and B of the Hazard Communication Standard of 29 CFR, Part 1910.1200.
 3. In addition, the chemicals listed in the following resources are to be considered hazardous and shall fall under the scope of the Hazard Communications Program:
 - 29 CFR, Part 1910, Subpart Z, “Toxic and Hazardous Substances”, OSHA
 - *Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment*, American Conference of Governmental Industrial Hygienists (ACGIH)
 - International Agency for Research on Cancer (IARC), *Monographs*
 4. Two or more chemicals that may not be hazardous when separate may result in a chemical reaction or chemical mixture that may need to be tested to determine whether the mixture presents a physical hazard (such as a combustible or explosive), or other hazardous combination.

5. Determination of site-specific physical hazards will be based on daily site inspections performed by Pafford EMS staff members.
6. Identification of physical hazards shall include weather conditions and address issues such as tools, equipment, vehicular traffic and site characteristics.

B. Hazard Chemical Inventory - List of Hazardous Chemicals

1. The Health and Safety Officer will be responsible to maintain and develop a current list of hazardous materials (a hazardous chemical inventory) brought onsite.
 - a. This list shall be maintained by the Health and Safety Officer and personnel are encouraged to review it.
 - b. This list includes the name of the chemical, the manufacturer, the work area in which the chemical is used, the dates of use, and the quantity used.
 - c. Further information on each chemical may be obtained from the MSDSs located in the Health and Safety Officer's office.
2. When new chemicals are received, this list will be updated (including the date the chemicals were introduced) within 30 days.

C. Labeling and Containers

1. When a chemical is received from a manufacturer, distributor or other source, the staff member responsible for its receipt will verify that the container is properly labeled with the following information:
 - a. The contents
 - b. Appropriate hazard warnings, as listed on the MSDS
 - c. Name and address of the manufacturer
2. All chemicals should be stored, dispensed from and used in their original, labeled containers.
 - a. The use of secondary containers shall be avoided except when necessary.
 - b. Secondary containers shall be properly labeled as to contents, and shall contain appropriate hazard warnings, and the name and address of the manufacturer.

3. All original labels, warnings, and other printed information must be maintained intact and plainly visible at all times.
 - a. It is the responsibility of the Health and Safety Officer to make sure that hazardous chemicals are not allowed in unlabeled containers.
4. Container integrity and proper labeling are to be verified by frequent inspections and documentation as to inspection date and personnel conducting the inspections.
5. Leaks, corrosion, fractures, or other potential failure indications are to be noted and corrective action taken.

IV. Material Safety Data Sheets.

- A. All chemicals brought to or utilized by Pafford EMS must be accompanied by MSDSs provided by the manufacturer.
 1. It is the responsibility of the person receiving any such chemical, as well as the Health and Safety Officer to ensure that all chemicals onsite have an MSDS.
 2. A current MSDS shall be obtained if not available when the chemical arrives at the station.
 3. Once received, the MSDS shall be reviewed for completeness and to determine if the new chemical presents any risks in its current condition or in combination with other chemicals at the station.
 4. Appropriate staff member notification and training shall be provided following such determinations.
- B. Each MSDS shall contain the following:
 1. Name of the product on the label
 2. Chemical and common name of each ingredient if the chemical is a mixture
 3. Physical and chemical characteristics of the chemical
 4. Physical hazards of the chemical
 5. Health hazards of the chemical
 6. Primary routes of exposure

7. OSHA permissible exposure limits, ACGIH threshold limit values, and/or any other exposure limit used or recommended by the chemical manufacturer or importer
8. Whether the hazardous chemical is listed in the NTP Annual Report on Carcinogens or has been found to be a potential carcinogen in the IARC Monographs or by OSHA
9. Precautions for safe handling
10. Exposure control measures
11. Emergency and first aid procedures including the local number for the Poison Control Center
12. Date the MSDS was prepared or revised
13. Name, address, telephone number or website URL of the manufacturer, distributor, or importer or other person who could provide additional information on the chemical and the appropriate emergency procedures, if necessary.

C. If any of the above items are not available, the MSDS should so indicate.

V. Staff Member Training and Information.

- A. The Health and Safety Officer is responsible for the Hazard Communication Program and will ensure that all program elements are carried out.
- B. Everyone who works with or is potentially exposed to hazardous chemicals will receive initial training on the hazard communication standard and this plan upon assignment to any job task involving the use of hazardous materials and whenever new material posing new physical or health hazards is introduced to the work site.
- C. General information and training will be provided in classes, as required by 29 CFR Section 1910.1200. Information conveyed to staff members in these classes will include the following:
 1. An overview of the OSHA hazard communication standard in 29 CFR Section 1910.1200.
 2. The hazardous chemical present in a staff member's work area.
 3. The physical and health risks of the hazardous chemicals.
 4. Symptoms of overexposure.

5. How to determine the presence or release of hazardous chemicals in the work area.
 6. How to reduce or prevent exposure to hazardous chemicals through the use of control procedures, safe work practices and personal protective equipment.
 7. Steps the organization has taken to reduce or prevent exposure to hazardous chemicals.
 8. Procedures to follow if employees are overexposed to hazardous chemicals.
 9. How to read labels and MSDSs to obtain hazard information.
 10. Location of the MSDS file and written hazard communication program.
- D. Prior to introducing a new chemical hazard into this organization, each staff member who has the potential to work with, near or be exposed to the chemical will be given information and training as outlined above for the new chemical hazard.

VI. Hazardous Non-Routine Tasks.

- A. Periodically, staff members may be required to perform non-routine tasks that could be hazardous.
1. Prior to starting work on such projects, each affected staff member will be informed by the Health and Safety Officer about the hazardous chemicals he or she may encounter during such activity.
 2. The information will include specific chemical hazards, protective and safety measures the staff member should use, and steps the organization is taking to reduce the hazards, including ventilation, the presence of another staff member, personal protective equipment and emergency procedures.

VII. Informing Other Personnel/Contractors.

- A. It is the responsibility of the Health and Safety Officer to provide other employers and contractors with information about hazardous chemicals that their staff members may be exposed to and suggested precautions for the staff members.
- B. It is the responsibility of the Health and Safety Officer to obtain information about the hazardous chemicals used by other employers to which personnel of this organization may be exposed.
- C. Other employers and contractors will be provided MSDSs for hazardous chemicals generated by this organization's operations.

1. In addition to providing a copy of an MSDS to other employers, other employers will be informed of any necessary precautionary measures to protect staff members exposed to hazardous chemicals used by this organization.
2. Other employers will be informed of the hazard labels used by this organization.
3. If symbolic or numerical labeling systems are used, other employees will be provided with information to understand the labels used for hazardous chemicals for which their staff members may have exposures.

VIII. Program Availability.

- A. A copy of this Hazard Communications Program will be made available, upon request to staff members and their representatives.

Post-Exposure Evaluation and Follow-up

Purpose:

To provide an evaluation and follow-up if an exposure incident should occur at Pafford EMS.

Policy:

Pafford EMS will provide an evaluation and follow-up following any exposure incident that should occur to personnel of Pafford EMS.

Procedure:

I. Standards.

- A. Should an exposure incident occur, contact the Health and Safety Officer immediately. If the Health and Safety Officer is not available, contact your supervisor or any member of management immediately.
- B. A confidential medical evaluation will be conducted by a licensed health care professional. Post exposure follow-up will be conducted following the initial treatment.