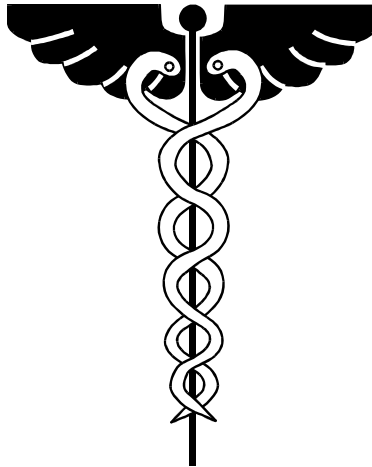


Employee Handbook



Revised
June 2010

All employees of Canyon View Medical Group are at-will employees. This means that just as employees can quit at any time for any reason, the company may terminate any employee for any reason. No employee, officer, agent or other representative of the company has any authority to enter into any agreement or give any promises which alter or change the employment-at-will status of an employee. None of the policies in this employee handbook, or written policies that may be issued subsequently, are contracts or guarantees of employment for any specific period of time nor do they alter the employee's at-will status. The policies in this handbook may be unilaterally changed from time to time in the sole discretion of management, although the company will do what it can to keep its employees informed of any changes.

Table of Contents

Error! Reference source not found.Error! Reference source not found.The Patient ...	<u>5</u>
Office and Working Hours.....	<u>5</u>
Organization.....	<u>6</u>
Lines of Authority.....	<u>7</u>
Job Descriptions.....	<u>9</u>
Initial Employment Period.....	<u>9</u>
Salary	<u>10</u>
Minimum and Maximum Wage Scale	<u>12</u>
Holidays	<u>12</u>
Employee Benefits Review.....	<u>13</u>
Vacation Policy.....	<u>15</u>
Medical Care Policy.....	<u>16</u>
Personal Appearance.....	<u>16</u>
Personal Phone Calls.....	<u>17</u>
Cellular Phone Policy.....	<u>18</u>
Internet Policy.....	<u>19</u>
Ear phone Policy	<u>20</u>
Substance Abuse	<u>20</u>
Outside Employment.....	<u>21</u>
Housekeeping.....	<u>21</u>
Disciplinary Action.....	<u>22</u>
Termination.....	<u>23</u>
Summary Dismissal	<u>23</u>
Performance Appraisal.....	<u>24</u>
Communication.....	<u>25</u>
Reemployment/Return to Work Policy.....	<u>25</u>
Family Medical Leave.....	<u>26</u>
Compliance Program	<u>27</u>

Harassment Policy.....	28
HIPAA Compliance	29
Red Flag Compliance.....	33

The Patient

The following reflects the Canyon View Medical Group's attitude toward our patients. You will notice that they are at the core of our purpose. As you work here you will always remember to treat patients with the utmost respect. All of us have to do with patients for much of the day. It is important to strive for the correct attitude in dealing with them:

- | |
|---|
| 1. A patient is the most important person in our business. |
| 2. A patient is not dependent on us--we are dependent on him or her. |
| 3. A patient is not an interruption of our work--he or she is the purpose of it. |
| 4. A patient does us a favor when he or she calls--we are not doing him or her a favor by serving him or her. |
| 5. A patient is part of our business--not an outsider. |
| 6. A patient is not cold statistic--he or she is a flesh and blood human being with feelings and emotions like our own. |
| 7. A patient is not someone to argue or match wits with. |
| 8. A patient is a person who brings us his or her needs. It is our job to fill those needs. |
| 9. A patient is deserving of the most courteous and attentive treatment we can give. |
| 10. A patient is the lifeblood of this business. |

Office and Working Hours

The Spanish Fork Clinic regular hours are from 9:00 a.m. to 6:00 p.m. on weekdays. We maintain hours from 6 p.m. to 8 p.m. for after hours urgent care. We also have hours from 10:00 a.m. to 5:00 p.m. on Saturdays. Telephone receptionists should be here at 7:45 a.m. on weekdays.

The Art City Family Medical Center regular hours are from 8:00 a.m. to 8:00 p.m. on weekdays. Our walk-in clinic goes from 6:00 to 8:00 p.m. on weekdays and from 8:00 a.m. to noon on Saturday although patients may walk-in at any time of the day, Monday through Friday.

The Santaquin Medical Clinic has daily hours from 9:00 a.m. to 5:00 p.m. As of this printing there are no Saturday or evening hours.

Payson Pediatrics is open Monday thru Friday 9:00 a.m. to 5:00 p.m. As of this printing there are no Saturday or evening hours.

The Canyon View Women's Care clinic is open in Payson Monday, Tuesday, and Thursday from 9:00 a.m. to 5:00 p.m., in Provo on Wednesdays from 9:00 a.m. to 5:00 p.m. and in Spanish Fork on Fridays from 9:00 a.m. to noon.

The doctors in the company rotate their late night hours and their Saturdays. The nurses assigned to that doctor work when their doctor works. A lab/x-ray technician and receptionist(s) will work on Saturday as needed at the two major sites.

All other personnel should be flexible in regard to working hours--if needed they will be called on to work late or weekends also.

Any overtime (anything over 40 hours in a week) must be cleared with your supervisor.

Organization

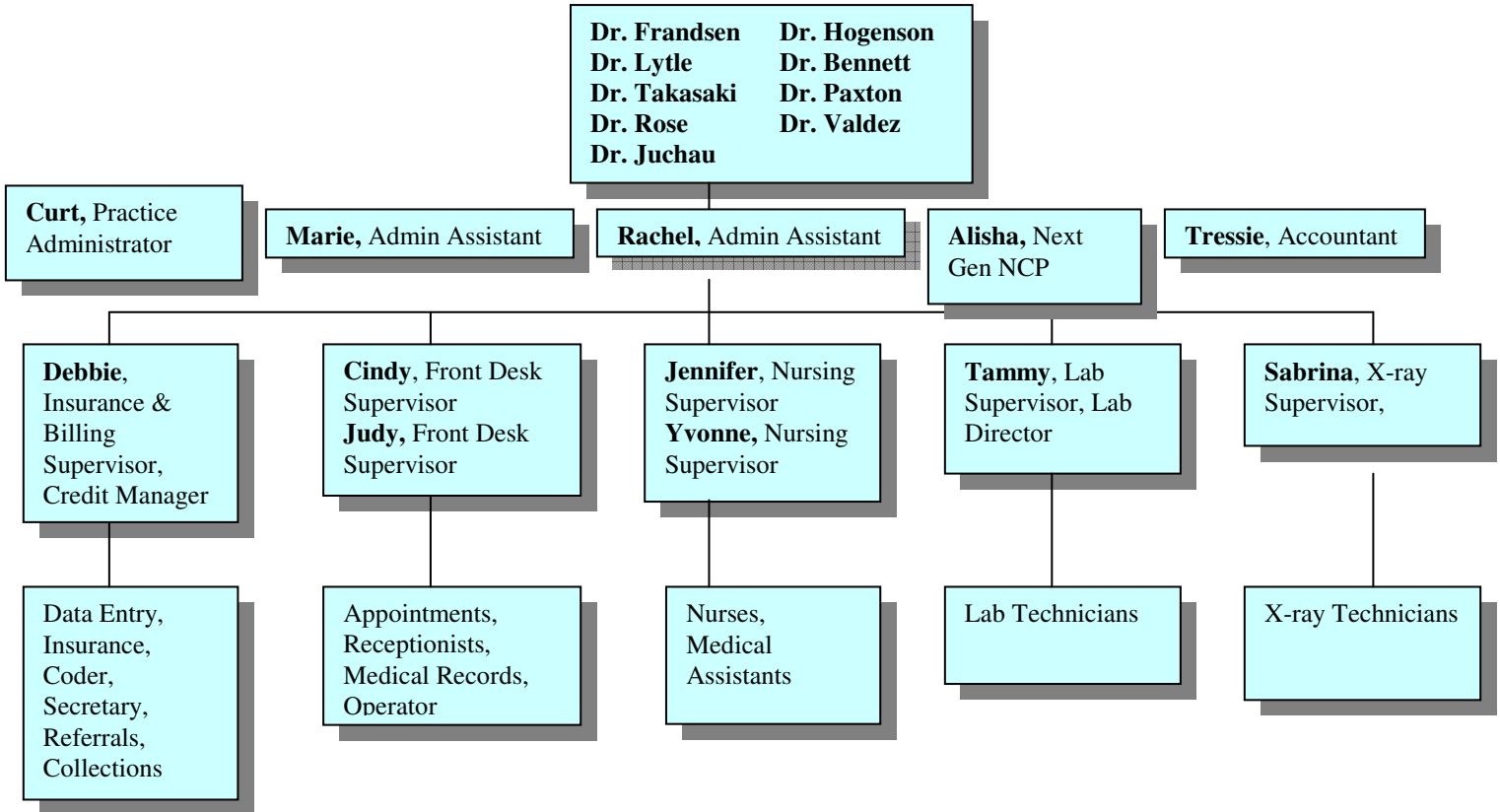
Your ideas are important to us. After you have worked at the Clinic for a time you may see ways to improve the ways things run here. We encourage you to speak with your supervisor about your ideas. Some of them can be immediately implemented and others will have to have the approval of others.

A medical practice is organized to provide the best attainable medical care for the patient. The physicians are the only persons in the practice who know what they need to provide that care. They are the ones who are ultimately in charge of making the decisions which affect the way care is provided.

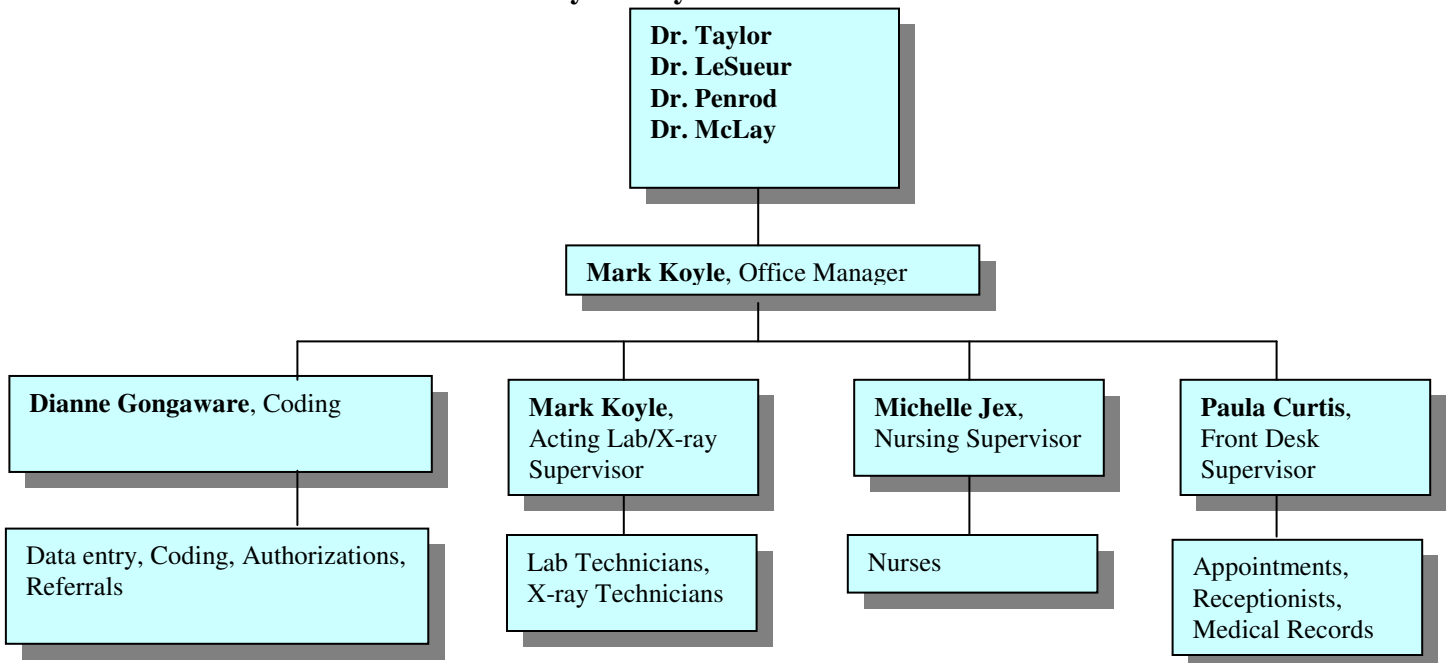
The physicians, however, due to the demands on their time, will delegate much authority. This means that instead of spending time performing administrative duties, they will spend as much time as possible seeing patients. Since administration and supervision duties must be properly accomplished, they have assigned certain people to handle those administrative responsibilities. This means that you will not always be able to deal directly with the physicians but will be working under a supervisor, the office manager or the office administrator. Should a question arise concerning your duties you should first seek advice from your supervisor. If she is unable to answer your query you will next approach the office manager or administrator. If he is unable to give you an answer he will speak to the appropriate physician in charge of the area of responsibility under which your question falls. You are discouraged from going outside the lines of authority outlined above.

The following chart illustrates the organizational lines of authority for the clinics:

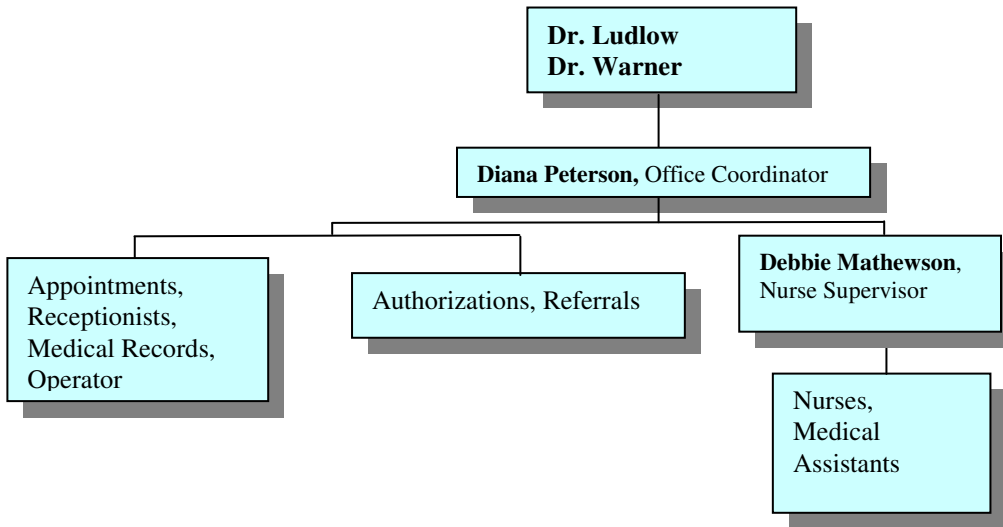
Lines of Authority Spanish Fork Clinic



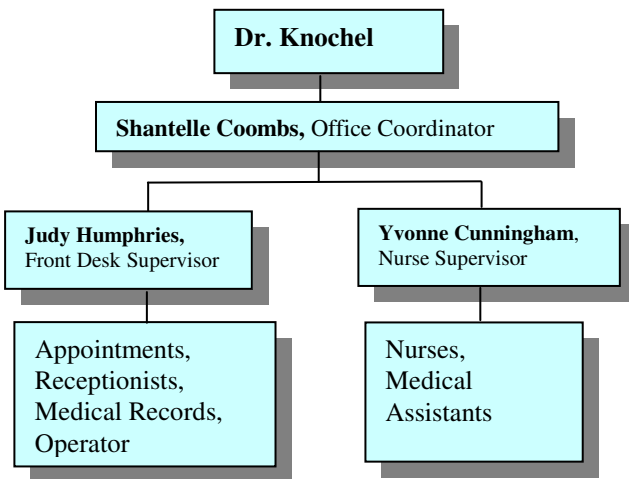
Art City Family Medical Center



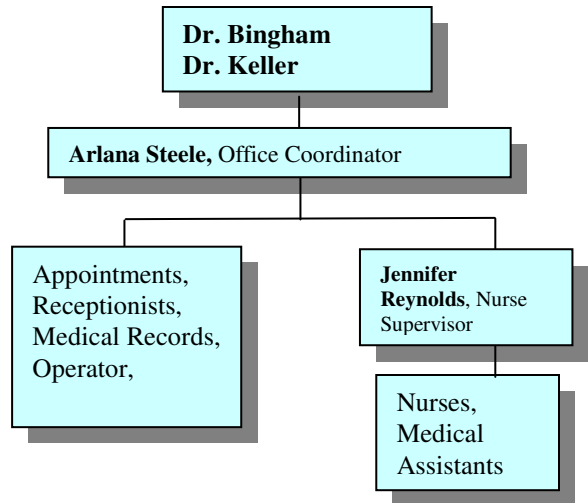
Canyon View Women's Care



Payson Pediatrics



Santaquin Medical Clinic



Job Descriptions

Job descriptions are important items at this practice. They describe what each of us do and how our positions integrate with each other. They are a dynamic instrument and in a constant state of change. They require input from you and from management to make them really work for you. At regular intervals you will be asked to review your job description--especially if there has been a dramatic change in the way things are done here. It is only through this practice of continual review that everyone will know how tasks are integrated at the Clinic. Notice also that the person responsible for supervision is indicated on your job description. This relationship is important for the proper functioning of this practice. Your particular job description is not contained in this Employee Handbook but will be furnished you by your supervisor.

Despite the fact that your job description details your major responsibilities, there will inevitably be tasks you will undertake that are not explicitly stated on your job description. You are expected to complete all of your assignments successfully with dispatch and care.

Initial Employment Period

The first few months of your employment are merely a time you can get to know us and we can get to know you. Naturally, your work will be evaluated and your performance assessed. No one expects you to know everything about your job in a short amount of time. You should use this time to determine if you are adequately suited to work in a medical office environment. It is important to note that not everyone fits comfortably into this kind of work. You may enhance your career goals by working here, or maybe your talents are more suited to some other type of work. The doctors will decide how you fit into their ideas of contributing to quality patient care. You, too, will have to decide how comfortable you can be here.

You will be given training and guidance to help you develop your skills. If you need additional help during this initial period, just ask. Your supervisor will be glad to accommodate you.

If dismissal is necessary, you may be asked to work for a period of two weeks to allow us to find a replacement. In a few instances, however, termination may be immediate. If termination occurs any time within the first 180 days of employment, severance pay will not be given.

Carefully consider your early days here. Do you enjoy working here? Do you get along well with your co-workers? Is the work challenging? Do you find satisfaction in helping others receive the health care they need?

Salary

You were hired here to perform a specific series of tasks. We expect to pay you at a rate that is competitive with what other practices and other industries pay for similar skills. You will be given a Pay Rate Scale Chart that will tell you what our minimum and maximum wage will be. This is a floating scale, which may change from time to time as conditions change.

We feel that it will probably take a minimum of five to six years to attain the maximum pay scale. You will have an initial evaluation with your supervisor at 3 months. If she feels that you are progressing as expected she will authorize a \$.25 per hour raise which takes effect starting with the next full pay period after the 3-month anniversary of your hire date. This procedure will be repeated again at 6 months. It is up to you to remind your supervisor of your upcoming three- and six-month milestones. When an employee has been at CVMG for 15 years, and every 5 years after, there will be a \$1.00 / hour raise given as appreciation as a long term employee. You will be responsible to let your supervisor know of these milestones.

After the initial six-month period, all raises, when given, will take effect in January, following an evaluation process covering the previous year. A certain amount will be designated as your incentive amount. Employees should be aware that this is not to be considered a “Christmas Bonus.” The practice evaluates profitability during the year. The doctors would like you to share in any economies we are able to achieve or greater productivity effectuated. However, it is likely that there will be some years in which, despite the best efforts of employees and doctors, there is a reduction in profitability. Please know that we are not trying to punish you by reducing or eliminating incentive amounts. It is only fair that if employees share in the surpluses generated in good years, they should likewise share in reductions or elimination of incentives in troubling years. Employees should not plan on necessarily receiving incentives at year’s end. When conditions are right to offer employee incentives, you must take 50% of that amount designated to you to be spread out evenly over the following year as salary enhancement, providing you have not reached the top of your pay scale. You have two options for the remaining 50% of this amount: (1) you may take that amount as salary for the upcoming year; (2) you may take it as a cash incentive. You *must* remember that you will not reach your maximum wage within the five- to six-year period if you take your incentive as cash. ***Please note: Incentives are not considered a given benefit. They are dependent on how the Canyon View Medical Group does financially. Also, please note that incentives are only given to continuing employees. If you leave our employ either voluntarily or involuntarily before the end of the year, you will not receive any incentive money for the year.***

Notice that the company may give a “cost of living” raise to the employees in the company. This, too, will be added to the employee wage scale, when given.

Deductions from your gross pay are for the money owed by you to the government, state and federal, for income taxes, social security, and other taxes, and also for

insurance premiums, etc. Your take-home pay is the total amount indicated on your pay-check, less all of these deductions.

Pay checks are issued on every other Thursday. All overtime must be authorized by your supervisor, office manager or the office administrator to be eligible for payment.

There is a time clock in the chart area. You must speak with Tressie to be given a punch number, as well as to have your finger scanned. If you do not work at a site with a finger scanner, you will be required to punch in and out online. You may access this site <http://timeclock/qgest/login/login.asp> to clock in/out (at smaller sites). Please see Tressie for your login. Time punches are recorded in military hours, regular minutes. Ex: 15:35 would be 3:45p.m. This site is only available when you are connected to the servers, so don't try it at home.

Employees will not be able to change their timecard at will. If you have forgotten to check in or out, you will need to have the time authorized by your supervisor, office manager, or office administrator to be eligible for payment (please see your supervisor for training on time clock requests). Vacation or sick requests must be made using the time clock website, although it is also polite to verbally let your supervisor know what days you are requesting.

Minimum and Maximum Wage Scale for 2009

<i>2009 Salaries</i>	<i>Minimum</i>	<i>3-Month Raise</i>	<i>6-Month Raise</i>	<i>Maximum</i>
Nurse (RN)	12.00	12.25	12.50	19.18
Nurse (LPN)	11.40	11.65	11.90	15.76
Nurse (Aide)	10.80	11.05	11.30	14.98
Lab Director	12.37	12.62	12.87	19.78
Lab Tech (Certified)	11.06	11.31	11.56	15.89
Lab Tech (Non-Cert.)	10.80	11.05	11.30	13.47
X-Ray Registered Tech (RRT)	15.31	15.56	15.81	19.31
X-Ray Practical Tech	14.31	14.56	14.81	17.31
Business Office	10.80	11.05	11.30	16.01
Receptionist	10.80	11.05	11.30	13.79
Secretary	10.80	11.05	11.30	15.01
Appointments	10.80	11.05	11.30	13.79
Medical Records	10.03	10.28	10.53	11.69
Bookkeeper	12.09	12.34	12.59	17.53
Accountant	15.09	15.34	15.59	21.83
Administrative Assistant	12.41	12.66	12.91	23.00
Office Coordinator	10.55	10.80	11.05	15.47
NextGen Coordinator /NCR	12.17	12.42	12.67	17.65
Certified Coder	11.81	12.06	12.31	16.81
IT Specialist	10.81	11.06	11.31	16.00
IT Supervisor	12.81	13.06	13.31	18.81
Maintenance	15.00	15.25	15.50	21.00

Holidays

The following are considered paid holidays provided you work your scheduled day before and your scheduled day after the holiday. However, under special circumstances, your supervisor may okay exceptions to your work schedule prior to the holiday.

New Year's Day

Memorial Day

Independence Day

July 24th

Labor Day

Thanksgiving Day

Christmas Day

Employee Benefits Review

Full Time Employees

Category 1

(Employees working 32 to 40 hours a week)

- ⇒ Retirement Plan at appropriate entry date available after one year of service
- ⇒ Uniform allowance after one month (\$20.00), newly hired with intention of full-time included.
- ⇒ Holiday Pay: Seven per year—paid out for eight hours
- ⇒ Disability Insurance (after one month)
- ⇒ Health Insurance for employees if they have no other coverage currently (the first of the month after 90 days employment) [Must work 30 hrs./wk. to qualify]
- ⇒ Voluntary participation in the 125 cafeteria plan
- ⇒ Sick Leave:

An employee accrues four hours per month. Payment is at a rate of 2/3 of the regular pay at the time of payment. Sick leave can accrue for three years or eighteen days.

* Vacation as per hours scheduled:

- First yearNo vacation
- After the First year 1 week of equivalent scheduled hours
- After the Second year 2 weeks of equivalent scheduled hours
- After the Fourth year 3 weeks of equivalent scheduled hours

If you are scheduled 40 hours per week, then your vacation is 40 hours per week.

If you are scheduled 32 hours per week, then your vacation is 32 hours per week.

For the nursing staff: Because you typically work a 32 hour week, your vacation will reflect the 3 weeks of scheduled hours. The maximum days for 3 weeks vacation are 12 days, maximum hours are 120.

Because it is difficult to track vacation time if a hire date must always be considered, we will use January 1st date for the time when you are given your new vacation amount of time for the year, after the initial adjustment period. An example of how vacation time is computed and delivered to employees completing their one year employment period is as follows:

Suppose Jane begins her employment on July 1st. On June 30th of the following year she completes her one year mark as an employee. However, since vacation time is computed on the first of January she would have to wait until that time to receive her week of vacation. Instead, we give her 2 and 1/2 days vacation time until the end of December.

On the first of January we give her another full 5 days for that year's usage as well. Mary, who started on October 1st would receive 3/12 (1/4) of 5 days vacation to last her until the end of that year (1 and 1/4 days vacation). Then she too would receive 5 more vacation days on January 1st for the following year. Thereafter, each January 1st, new vacation times are computed for each employee.

All employees must take paid vacation hours for any time taken off first before taking days off without pay. We will no longer hold pay for vacation days taken for future reimbursement. Vacation will be paid for the pay period it is taken.

Category 2

(Employees working 21-31 hours a week)

- ⇒ Retirement Plan at appropriate entry date available after one year of service
- ⇒ Uniform allowance after one month (\$10.00), newly hired with intention of three-quarter time hours.
- ⇒ Holiday Pay: Seven per year—paid out for four hours.
- ⇒ Disability Insurance (after one month) *For Employees working under 30 hrs this is not a benefit.*
- ⇒ Health Insurance for employees if they have no other coverage currently (the first of the month after 90 days employment) [Must work 30 hrs./wk. to qualify]
- ⇒ Voluntary participation in the 125 cafeteria plan
- ⇒ Sick Leave:

An employee accrues two hours per month. Payment is at a rate of 2/3 of the regular pay at the time of payment. Sick leave can accrue for three years or eighteen days.

* Vacation as per hours scheduled:

- First yearNo vacation
- After the First year 1 week of equivalent scheduled hours
- After the Second year..... 2 weeks of equivalent scheduled hours
- After the Fourth year..... 3 weeks of equivalent scheduled hours

For an employee in this category, vacation hours will be prorated with a maximum of three weeks vacation.

Please note: Vacation hours are earned from the hours you worked the previous year.

All employees must take paid vacation hours for any time taken off first before taking days off without pay. We will no longer hold pay for vacation days taken for future reimbursement. Vacation will be paid for the pay period it is taken.

Category 3

Part-time employees

- ⇒ No retirement plan *
- ⇒ No Uniform allowance
- ⇒ No Holiday pay.
- ⇒ No Disability Insurance *
- ⇒ No vacation
- ⇒ No sick leave benefits
- ⇒ No participation in the 125 cafeteria plan

- * Retirement Plan: Any CVMG employee can enroll in the 401K Money purchase plan when they have been employed for one year, are 21 years or older, and have worked at least 1000 hours the previous year. CVMG employees will need to continue working 1000 each year in order to participate in this plan.
- * Disability Insurance: Any CVMG employee must work at least 30 hours a week to qualify for Disability Benefits.

**Overtime must be requested to and approved by your supervisor who will get overtime hours authorized by Curt or Marie.

Vacation Policy

It is office policy that when an employee takes a regularly scheduled day off it must be counted as a vacation day. Days missed for personal illness will be counted as a sick day until all sick days have been used. Additional days off for illness will be counted as vacation days.

If employees want to retain vacation pay for payment at a later day, they may do so by notifying their supervisor who in turn must notify the office administrator. Vacation days may not be cashed in for money unless there are additional unused days at the end of the year, at which time employees will be paid for unused vacation days. **Please refer to Employee Benefit Review Section for guidelines.**

Vacation is earned from hours worked the previous year (i.e., vacation hours for this year, 2010 were earned in 2009) In the event that an employee leaves Canyon

View during the year, and vacation earned the previous year has not yet been used, or has only been partially used, the employee will receive a percentage of their vacation days earned. (i.e., if you were to leave our employ in May, you would receive 5/12 of your vacation hours earned in the previous year.) If you have already used some of your vacation, the remaining hours will be pro-rated for a total of 5/12th and paid out on your last regular payroll check.

When a doctor decides to take time off, his or her nurse may use her own discretion as to whether to use her vacation days/pay at that time, as long as we are able to employ a fill-in nurse who can work for her doctor in the regular nurse's absence.

After allotted vacation days are used up, it will be at the discretion of the personnel committee (supervisor, office manager office administrator, personnel director) if the employee can be spared for additional time off without pay.

Medical Care Policy

It is the intention of the doctors in the Canyon View Medical Group to provide medical care for your immediate family (dependent children living at home) if you so desire. If you have no health insurance coverage outside the Canyon View Medical Group, we will provide you with the same medical coverage offered other employees there. This is for your coverage only. The cost to you as an employee is about 10 percent of the premium. Any further benefits for your family can be obtained by your payment of the extra premiums involved.

Please note that the doctors do not consider married children of employees and their dependents to be immediate family for the purposes of this medical care policy. Co-pays are an integral part of an insurance plan and we may not write off these co-pays as a routine matter. You are expected to pay your co-pays at the time of medical service as are all our patients.

Check with the office manager or administrator for the cost of the current insurance plan offered by the company.

We currently offer a cafeteria plan in which employees may declare expected out-of-pocket medical expenses (including co-pays and deductibles) as well as child care costs. Ask your supervisor, the office manager or the practice administrator about this plan and how it may benefit you.

Personal Appearance

The Canyon View Medical Group requires that all clinical personnel as well as the front desk personnel wear a uniform. The uniforms are chosen by the nurses, the lab personnel, and the front desk personnel. Each group coordinates their colors for different days of the week.

Since virtually everyone in the office deals with the public daily we ask that you be moderate in your personal appearance. While the clinical staff will wear uniforms, other office personnel may wear appropriate clothing. This clothing is considered office casual clothing. The Clinic recommends that there be no blue jeans or “grubby” wear. We have designated Fridays to be a dress down day for those employees who do not work on front desk or in clinical areas. We permit those who do not wear scrubs as part of their uniform to wear clean, untattered, properly laundered blue jeans to work on Fridays. Saturdays are not considered dress down days. Of course, doctors can wear whatever clothes they deem appropriate for the workplace.

We are a business in a conservative area of the country. Some of our patients may feel uncomfortable interacting with our employees who may adopt a more liberal personal appearance than community norms. Consequently, we ask that you take care to cover distracting tattoos, remove egregious piercings, and generally adopt a conservative appearance while working. We also ask that you not wear excessive jewelry or adopt excessive hair styles. Be considerate of your co-workers by not using strong perfumes or colognes.

Open toed shoes do not give adequate protection for employees in our offices. We work in an area that has the possibility of contact with blood borne pathogens, urine and other bodily fluids. We also work where needles are often in our immediate work areas. In order to protect our employees we ask that no open toed shoes be worn in the workplace.

We have provided name badges for our employees. These name badges properly identify you as an employee of Canyon View. They also list your first name. These are helpful to patients in their interactions with you. It is required that you wear them at all times at work.

The company provides a \$20 per month uniform allowance for full-time employees and \$10 per month for part-time staff after the employee has been here for 1 month. This is to be used to keep you looking neat and clean as well as to help defray the cost of appropriate clothing. If you lose/misplace or break your nametag a \$15 replacement fee will be removed from your uniform allowance. If you receive no allowance, the \$15 fee will be removed from your next paycheck.

Personal Phone Calls

Certain personal calls are encouraged by this office. Calls to arrange transportation check on the safety of immediate family and other important outgoing calls can be made. They should be local calls and must be made at a time when they do not interfere with your work. They should be brief and not cause you to fall behind in your duties. There are many phones scattered throughout the building. When you need to make a personal phone call we ask that you locate a phone away from patients, briefly take care of your business and then return to your work station. You are given 30 minutes of break time during the day besides your lunch time. We ask that you try to take care of business

during those times. However, we still ask that you keep your calls from the office short, since they tie up phone lines that are important that we keep open for our doctors and patients.

Incoming calls need to be extremely brief since they will normally come at a time when you are busy. Please avoid having people call you at work, when possible.

Social, church and civic activities in which you are involved are looked upon as extremely worthwhile by this office. They can be fulfilling, rewarding and can contribute much to the community. However, since these activities can be disruptive to the office, they are not permitted here. You are encouraged to pursue them while off the job.

Cellular Phone Policy

We have asked the patients not to use cell phones in our clinic. You know the reasons: people on cell phones bother other patients with loud and boisterous talking, the ringers are noisy and annoying, patients are loathe to interrupt a call to take care of necessary business we need for them to do for us, when the doctor walks in the room they want to take another 2 minutes of his time to let them finish up their phone call, etc.

We notice some of the same problems taking place with our employees and their cell phones as happens with our patients. We have seen nurses talking on their phones while dealing with patients, front desk staff talking on their phones while taking care of patients. Some of the cell phones in the clinic ring all day long. It is not uncommon for some people to receive 10 or more calls a day on their phones. While we appreciate not clogging our business lines with personal calls, it seems excessive to have that many personal calls a day at a person's workplace. I think it is a great service for working mothers to have their children's care takers be able to reach them with emergent issues. It is also nice to have the automobile repairman be able to reach you about important decisions you have to make. However, having friends call just to chat is not acceptable when this causes constant interruptions during the day. An occasional personal call during a person's break time is perfectly all right. However, the call should be handled in a private area away from patient care areas.

Our policy at the clinic will be:

- Cell phones are permitted.
- Phones may not be used around patients. Incoming calls should be taken after the patient care is finished.
- Loud and noisy ringers and message reminders should be disabled if phones are left in working areas.
- If phones are carried on your person, you should select vibrate if you wish to leave your phone active.
- Employees should consider turning off phones and then checking for messages at appropriate times.
- Emergency messages are all right, of course, and may be handled ASAP.

- Personal, non urgent calls should be handled on scheduled breaks and away from patient care areas.
- Text messaging should be for emergencies only. Substituting a text message session for a personal phone call or running a text conversation is not permitted.

You may want to inform your friends of your business hours and ask them not to call you during this time for non-urgent matters. If an employee has a pattern of making an inordinate number of personal phone calls during the day that interferes with his or her work production, that employee will not be permitted to use a cell phone while at work.

Internet Policy

We live in a different age than just a few years ago. Most of us use the internet at home everyday to shop, answer our e-mail, chat on line, do our banking, watch streaming videos, read the news, etc. While these are fine activities at home, they are not appropriate at work. While it is difficult to separate home from work activities, it is necessary that we do so. Therefore, here is our internet usage policy at CVMG:

*Internet is a convenience for doing your job.

*You are never permitted to download anything: screen savers, pictures, games or programs.

*You can't install anything without permission.

*Games are not permitted-this includes Crossword puzzles and Sudoku.

*Instant messaging in any form or in any program is prohibited

*No banking transactions-this includes balancing check book or paying bills

*No streaming of music. This includes:

*I-tunes

*Movies

*Radio Stations

*Talk Shows

*No use of personal web based e-mail except during the lunch hour.

* Do not give out your login password to your computer to anyone except: Curt, Marie, Alisha, Matt, or Logan unless they are accompanied by one of these people.

Ear Phone Policy

Because we work with the public, we need to be available to serve them. It is unprofessional to use ear phones. The use of ear phones in a public work place only expresses to the patient that you are busy and whatever you are doing is more important than to be of help to them. There is not a place in the office that the public does not see or may make judgment on so, our policy is that ear phones are not permitted in the workplace during business hours.

However, there are some exceptions: There are certain people who do not deal with the public as part of their job. These people may have offices in open areas of the clinic where there is a lot of commotion. We have given permission to these few employees to use ear phones to help block out the distraction of their working environment.

Substance Abuse

Smoking

As you know, smoking has been defined by the Surgeon General of the United States as a definite health hazard to the smoker as well as to the non-smoker. Because we are a facility which purports to look after the physical well-being of the individual it is important that we provide positive examples in this area. Therefore, there will be no smoking permitted anywhere inside the building. Besides the desire to provide a positive appearance to our patients, we wish to avoid any health risks to those non-smokers who may suffer adverse affects from the smoke to which they are subjected. Further, there are many people who are allergic to smoke.

If you choose to smoke please limit your smoking to areas outside the building and during break periods or lunch hour. State law requires smoking to be 25ft away from all public buildings. We would ask you to please not leave litter or smoking detritus in the parking lot area.

Drinking

Of course, while we have no desire to regulate an employee's alcohol consumption while not at work, we do not permit drinking in the workplace. An employee being intoxicated while at work is not permitted. We deal with life and death situations here at the Clinic. It is essential that those working here be lucid while at work. We ask that employees not drink alcoholic beverages before work or during working hours. Being intoxicated while at work may be grounds for immediate termination of employment.

Drugs/Medications

We will not tolerate any drug/medication abuse of prescription or illegal drugs during working hours by employees. Any employee who comes to work impaired will be taken home. It is imperative that those working for Canyon View have alert minds and be

physically able carry out their duties. Taking drugs that will alter your performance while at work may put the patients at risk and is an endangerment to Canyon View as a whole. Being impaired while at work may be grounds for immediate termination of employment.

Outside Employment

We hope that you will never need to work a second job after working full-time here. Though we understand that we live in an age in which it is difficult to make ends meet financially, we need all of your attention, energies and skills.

If you are considering a second job, please discuss it with your supervisor, the office manager or office administrator before you accept the position. We care about you and are concerned that holding two jobs may cause physical and emotional problems. We would like the opportunity to discuss the situation with you along with the reasons for your decision.

There may be some jobs that would injure your reputation or would have some overlapping relationships with your role here. If that should affect our patients adversely in any way, then we could not allow the dual relationship to continue. Other jobs could be perfectly all right and perhaps even increase your value to the practice and to the patients if they provide you with valuable experiences which might positively impact your work here.

We only want the opportunity to discuss all these matters with you in advance of your taking a second position. As long as the practice and the patients are not affected negatively by this new relationship, our sanction will not be arbitrarily withheld.

Housekeeping

We are proud of our office and take further pride in keeping it clean and neat. Quality patient care demands an extra measure of cleanliness. While it may not be your responsibility to clean the entire facility, we certainly expect your participation in caring for the areas in which you work.

We expect drawers, cabinets and storage areas to be neatly arranged. We realize that we have experienced unprecedented growth in the past few years. Consequently, we lack enough storage areas around the building. If it becomes necessary to store supplies and other items in plain view we ask that you stack them neatly and in an orderly fashion. We are taking steps to increase our storage space. Please help us out until these measures can be fully implemented.

We would like you to help us keep drawers, cabinets and storage areas neatly arranged. This helps in controlling quantities of supplies being stored and expedites reordering procedures. Desk tops and work counters should be straightened out at the end of each day.

Patient care areas are the most essential area that must be kept orderly in the office. Patients expect doctors' offices to be extremely neat and clean. This presents a special problem when you take into account the large numbers of people we see here at the Canyon View Medical Group on a daily basis. Nevertheless, you will be expected to keep common areas clean. Anytime you see things in those areas that need to be picked up, wiped off or cleaned, please help by getting it done as quickly as possible.

Disciplinary Action

We know that all people prefer to work in a happy environment where people respect each other and work together in peace and harmony. We are sure you know the difference between right and wrong. Therefore, regulations covering the common deficiencies will not become work rules here. We will expect you to treat others with respect in your interpersonal relationships.

It is especially important that those working in a medical clinic have great tolerance for sick people. Many of those coming to see the doctors here are ill and not feeling well. They are often worried, tense people who tend to treat others with less than appropriate behavior. You will be required to overlook discourteous or ill-mannered behavior. We will expect you to exhibit patience and tolerance in your dealings with patients at all times. If employees seriously violate the interpersonal relationships of dignity and trust, those employees will be disciplined or discharged.

You do not have to tolerate abusive language or behavior. If patients use such language on the phone you may politely inform them that you cannot help them if they treat you in such a manner, ask them please to call back when they are in control of their language and hang up. Patients in the clinic exhibiting such behavior should be asked to please leave the premises. They can be directed to the office manager or administrator's office, should that become necessary.

We will try to ensure that discipline here will always be fair. Employees may be warned orally by their supervisors, given help to improve, and even warned orally again. The supervisor will make a record of the warnings and conditions in order to monitor employee improvement properly. If a situation is not resolved the supervisor may have to resort to a written warning. If things still do not improve the office manager, administrative assistant, or office administrator might have a meeting with offending employees and hold an official disciplinary hearing after which he or she may issue a written reprimand. Employees will be given adequate time to rectify the situation. If matters are not resolved properly, termination of employment will be a possibility. Please note that we will not necessarily follow any exact order in disciplinary action. We reserve the right to terminate employment at any time and for any reason, with or without cause. Nothing in our disciplinary actions changes the at-will nature of employment in which the employee may terminate employment for any reason and the employer may likewise terminate employment.

If employees feel that discipline was improperly applied, they will have the right to a hearing with the doctor who is the director of personnel. The employee request for such a hearing must be received in writing within five days of the disciplinary action.

Termination

If at any time after the initial employment period it is necessary for us to terminate your employment, you may be given two weeks notice or severance pay to compensate you for two weeks employment.

If it is you who decide that you must end your employment here, we ask you also to recognize that you could greatly help us by informing us with enough lead time to be able to bring someone else in for you to help train. As a talented person who fills a real need at this practice, you will not be easy to replace, especially after you have worked here for several years and when you know your job better than anyone else.

We would like to take advantage of the expertise you have developed in your job. While we realize that there are many good reasons for leaving a job, we are going to miss you. It would be very helpful if we could get someone well qualified to replace you before you leave so you could aid us in that training. Please give us reasonable notice when you plan to terminate. It will be appreciated.

Any unused vacation money will be paid to you at the time you leave.

Summary Dismissal

There are certain things that will not be tolerated in this office and it is fair that these be directly presented so as not to be misunderstood.

The following will be cause for summary dismissal:

Violation of confidential information. Information that you acquire about patients and their illnesses while working in this office is to remain in this office. Rumors or inappropriate stories about your fellow employees or the doctors are also violations of a confidence. An employee salary or hourly wage is a private matter between the employee and his/her supervisor. The wage is an agreement between the two and should not be compared in any way to another's job description, work hours, etc. It is the policy of Canyon View Medical Group that salaries not be discussed among employees. Any topic concerning the personal lives of patients must be held in sacred trust. Never leave information where it can be observed by the casual visitor or other patients. Be careful with medical records, lab reports, correspondence, and even appointment schedules. It is improper to reveal information about a patient even to a member of the patient's family, and certainly never to other parties. When supplying information to third parties, even at the request of the patient, be sure to have a written release signed by the patient and approval by the physician.

Embezzlement of practice funds, equipment, or supplies. Be careful when handling money in the practice. Careless handling will not be tolerated and proof of dishonesty will result in dismissal. It is the policy of this practice to pursue reimbursement and this may mean arraignment on criminal charges.

Fraudulent forgery of documents. If it can be shown that any documents or paper were deliberately forged by you for improper purposes, you will be summarily dismissed.

Illegal use of controlled drugs. If it can be proven that you are using controlled substances illegally, or manipulating any office procedures to obtain controlled drugs illegally, you will be summarily dismissed.

Intoxication while at work. Being under the influence of alcohol while in the workplace will not be permitted. Being in such a state is grounds for immediate dismissal from the practice.

Conviction on a felony charge. If you are convicted of a felony, your work here will be terminated. Remember that your behavior reflects on your work and reputation. Guard it carefully.

Insubordination. Refusing to follow orders from your supervisor, office manager, administrative assistant, office administrator or a doctor will result in summary dismissal. Also, contemptuous rudeness or impertinent behavior or speech to superiors is considered insubordination. If you act in such a manner you will be fired and receive no additional benefits. There will be no notice and no severance pay given.

Performance Appraisal

You may have regular evaluations at the Clinic which will be conducted by your supervisor, overseen by the office manager or practice administrator and presented to the doctor personnel director. The following criteria will be measured:

1. Accuracy & reliability of work
2. Job knowledge and skill
3. Quantity of work completed (does extra assigned tasks--cleaning of rooms, etc.)
4. Initiative, enthusiasm for job, leadership ability, drive
5. Learning aptitude, alertness
6. Dependability, attention to duty, ability to follow instructions
7. Creativity, Learning Ability
8. Housekeeping: orderliness and cleanliness of own work area
9. Friendliness: verbal communications, body language, sincerity, warmth and

friendliness, helpfulness
10. Compatibility with others
11. Overall Professionalism: appearance, loud talking & laughing, gossiping, eating and drinking in designated areas, gum chewing, wearing name tags, etc.
12. Punctuality: arriving and departing at designated time
13. Maintaining regular working hours

Communication

Speaking clearly, honestly, but yet tactfully to patients is essential for us to be proud of the care we give. Extra patience and understanding often will be needed because a sick and worried person is typically not in the best mood. If after attempts to help an abusive patient on the phone or in the office have failed, refer the call to your supervisor, office manager, office administrator, or inquire of the doctor what should be done in this specific case to assist this patient.

Effective practice communications among us are also vital. Being human beings, we will regularly require assistance and special understanding from each other. Regular staff meetings will be held for us to work on practice problems. The policy in this practice is to know and do our individual duties and perform our responsibilities. We must also assist each other when an emergency situation arises. We should speak to each other clearly, honestly, respectfully and with tact. By carefully working on our communications we can minimize conflict situations and work together productively.

Return to Work Policy

Canyon View Medical Group is an E.E.O.C. employer. We have a good record for treating all employees without regard to race, color, religion, age, nationality or gender. It is our intent to continue with this tradition.

If employees have been off work for a considerable time, 30 days, they must have a release from their doctor with a note of ability to return to regular duties or to lighter duty or reduced hours. We will try to continue to work with the employee to get him or her back to regular hours.

If employees have become physically disabled and need added support, such as wheelchair access, etc., we will attempt to make reasonable accommodations.

A form should be provided to the employee and the employer to help coordinate the return to work. It should state what accommodations will be needed, if light duty will be needed, if shorter hours for time will be needed. This report will be kept in the employee file.

Family Medical Leave

The Family and Medical leave Act of 1993 (FMLA) provides certain employees with up to 12 weeks of unpaid, job-protected leave per year. It also requires that their group health benefits be maintained during the leave.

FMLA is designed to help employees balance their work and family responsibilities by allowing them to take reasonable **unpaid** leave for certain family and medical reasons. Canyon View Medical Group fully supports this legislation and works to aid its employees to understand this law and properly utilize it.

What does it cover?

With illness, the FMLA covers both physical and mental conditions that require either inpatient care or continuous care by a health care provider. The condition has to be more than temporary.

The following reasons are specifically mentioned in the Act:

- The birth and care of a newborn child of an employee;
- Placement with the employee of a child for adoption or foster care;
- Time to care for an immediate family member (spouse, child [up to 18 yrs. of age], or parent [but not a parent-in-law] with a serious health condition; **or**
- Medical leave when the employee is unable to work because of a serious health condition

Who can receive benefits?

To be eligible for the leave, the employee must have been employed at the office for at least 52 weeks, though the weeks do not have to be consecutive. The employee must also have worked at least 1,250 hours at the office during the last 12 months. At Canyon View Medical Group employees who qualify for FML will have their time based on a rolling 12-month period measured backward from the date the employee used FMLA leave.

What are the office's obligations?

The office has to continue the employee's health benefits during the leave, whenever such insurance was provided before the leave was taken and on the same terms as if the employee had continued to work. The office is not required to keep up any non-health benefits, but when the employee returns to work, it has to restore those. We have decided to maintain disability insurance and life insurance as well. However, during FML the employee will not continue to accrue sick leave or earn vacation time. The uniform allowance will be discontinued during the time of the FML as well.

Upon return from FMLA leave, an employee must be restored to the employee's original job, or to an equivalent job with equivalent pay, benefits, and other terms and conditions of employment.

How are the days counted?

In our office, employees have to use all their paid leave concurrently with their FMLA leave. Thus, the total time which can be counted for FMLA days is 12 weeks. FLMA days can be taken all at once. Or the employee can take a reduced-schedule leave and be absent for, say, once a week for medical treatments. The leave can also be intermittent, as when an employee takes off a week to care for a parent whose regular care is not available.

Do I have to let my employer know I plan to take Family Medical leave?

Employees seeking to use FMLA leave are required to provide 30-day advance notice of the need to take FMLA leave when the need is foreseeable and such notice is practicable.

Employers may also require employees to provide:

- Medical certification supporting the need for leave due to a serious health condition affecting the employee or an immediate family member;
- Second or third medical opinions (at the employer's expense) and periodic re certification; **and**
- Periodic reports during FMLA leave regarding the employee's status and intent to return to work.

When intermittent leave is needed to care for an immediate family member or the employee's own illness, and is for planned medical treatment, the employee must try to schedule treatment so as not to unduly disrupt the employer's operation.

Employees can get a more complete explanation of the Act and its implications by requesting **Fact Sheet No. 028**, a printout from the Department of Labor which is available in the bookkeeper's office, or by speaking with the office manager, administrative assistant, or Practice Administrator.

Compliance

We value our employees at Canyon View Medical Group. We believe them to be honest, hard-working individuals who care for patients and we wish for them to be able to offer the highest possible care for our patients. It is difficult to make sure that all regulations and procedures are being followed perfectly as those regulations change so often and are not infrequently difficult to understand and coordinate. We desire to provide a mechanism for our employees to report possible wrongdoings to the company in a way that is constructive, one that will permit us to effectuate change and bring us back into full compliance with existing laws and regulations. All those who work at Canyon View Medical Group may be assured that they will not be adversely affected by their good faith actions to help us attain full compliance.

All employees in the Canyon View Medical Group have a responsibility to ensure that we are operating within the laws and regulations overseeing our industry. We have different areas of expertise. If you know of or are made aware of a possible illegal action you are responsible to report this to your supervisor. If your supervisor is participating in the alleged wrongdoing, report it to the Manager/Administrator. All incidents can be reported to the Compliance Officer, Dr. Taylor, as well, though in general it is better if employees follow the proper chain of command.

If an employee knows or had the responsibility to know a wrongdoing was occurring in his or her department and does not report it, appropriate disciplinary actions may be taken for withholding this information.

Any report of wrongdoing or suspected wrongdoing will remain confidential, unless circumstances necessitate otherwise. Also, incentive and evaluations will be negatively affected if an employee had or should have had knowledge of a wrongdoing and did not report it.

Wrongdoing is defined as an action, open or hidden, by any employee or partner that is contrary to the rules and regulations that govern our organization. These regulations pertain to but are not limited to the billing, particularly of Medicare, Medicaid and government supported programs, ancillary services provided by Canyon View Medical Group (x-ray and lab), and any other federal, state or local regulation pertaining to our medical office.

Any employee engaged in wrongdoing (illegal activities) will be subject to the disciplinary action of the Compliance Committee and/or dismissed. If an employee has been convicted of illegal activities that do not call for immediate termination, he or she will not be allowed to work in a department or position that is related to the conviction (wrongdoing).

Harassment

Canyon View Medical Group is committed to offering employment in a productive climate, free from discrimination. We pledge to do everything we can to ensure that our employment environment is not tarnished by any unwelcome or offensive conduct. Accordingly, harassment of any kind by management or co-workers will not be tolerated.

Harassment exists when the actions of an individual, group, or company unreasonably interfere with an individual's working environment. In general, racial slurs, jokes or other verbal or physical conduct relating to a person's race, color, religion, creed, national origin, ancestry, age, disability, or veteran status, constitute harassment when they unreasonably interfere with a person's work performance or create an intimidating work environment.

Any employee who observes or is subject to an act of sexual or other unlawful harassment should report the incident to a supervisor. If the supervisor is unavailable (or if the employee believes it would be inappropriate to contact that person) the employee should immediately contact the office manager of the site. Employees may raise concerns and make reports without fear of reprisal.

Any supervisor or office manager who becomes aware of possible sexual or other unlawful harassment should promptly advise the executive committee who will handle the matter in a timely, confidential manner.

Anyone engaging in sexual or other unlawful harassment will be subject to disciplinary action, up to and including the immediate termination of employment.

It is always the policy of Canyon View Medical Group to afford a hospitable, cooperative, non-coercive work environment. That policy recognizes that harassment of any kind directed toward an employee, including harassment of a sexual nature, is improper and will not be tolerated. Anyone engaging in such harassment will be subject to appropriate discipline, up to and including discharge.

No management official may threaten or insinuate, either explicitly or implicitly, that an employee's refusal to submit to sexual advances will adversely affect an individual's employment or career development. Sexually harassing conduct, whether committed by supervisor or non-supervisory personnel, is strictly prohibited. Sexually harassing conduct may include: propositions; verbal abuse of a sexual nature; graphic verbal commentaries regarding an individual's body; sexual or degrading words used to describe an individual's body; sexual or degrading words used to describe an individual; and the display of suggestive objects or pictures.

Canyon View Medical Group encourages all employees who believe they have been subjected to acts of harassment to inform their supervisor or office manager immediately to ensure that appropriate action may be taken to prevent such conduct. Appropriate, strict confidentiality will be respected.

HIPAA Compliance

The federal government passed the Health Information Portability and Accountability Act (HIPAA) in 1996. There is an ongoing, gradual implementation of that Act. In April of 2003 the first step, that of patient confidentiality, was fully enacted. This law has had a dramatic influence on the way we account for and protect certain patient information. While we have always protected patient information, the new law has caused us to develop highly regularized procedures to ensure proper maintenance and protection of these data.

Access to Protected Health Information

Even though our patient medical records are accessible to each employee, the information in the records is on a need-to-know basis. If the employees not involved with the medical end of the business then they are not authorized to be in that part of the chart. The following is a guide as to who needs what access:

- Front desk staff needs to be in the demographics section and this includes the copying of insurance cards. They sometimes need to copy or distribute to the patient immunization records, labs, etc.
- Billing needs to have access to the financial information, insurance information, and on occasion the medical information to assure payment.
- Nurses need to have access to the complete chart for reasons of treatment, insurance for referrals, labs to pass on to patient, and other vital needs for the treatment of the patient.
- Lab personnel need access to the complete chart as well for the same reasons as the nurses.
- The doctors need complete access to the complete chart as well.
- Administration may need to all aspects of the chart.

As our paper medical charts are dispersed to many locations in the building it is not necessary for them to be isolated, except in rare instances, such as lawsuits or extreme treatments. Our employees and in particular our chart runners need to have this access to locate charts as needed.

As far as electronic information, access is given depending on the job of the employee and is secured by passwords that are to be kept confidential. When sharing computers, employees should keep their password to themselves and cause anyone else sharing their computer to log on with their own password as needed.

Confidentiality and Release of Information-Authorizations

Each employee is required to sign a confidentiality statement and adhere to it completely. Dismissal could result if a breach of confidentiality is determined. Uses and disclosures of protected health information (PHI) by staff will only be in accordance with HIPAA compliant authorizations signed by the patient or representative. In order for us to honor an authorization it must contain all the elements we require on our authorization form. We will not consider an authorization to be valid if it is missing any one of the elements on our release of information form and therefore will not honor it. Signed authorizations are to be maintained in the chart.

Disclosure of Information

If an employee discloses information without an authorization signed by the patient in accordance with our Notice of Privacy Practices, then the employee is to list that disclosure on the Accounting of Disclosure Form in the chart. If there are any

questions with respect to release of information, the employees are to get their HIPAA contact person involved or the Privacy Officer.

Patient Rights and Notice of Privacy Practices

An explanation of our patients' rights is found in our Notice of Privacy Practices. Each employee is to read and understand the Notice and sign a statement to this effect. The employee needs to abide by the information in the Notice.

Sanctions for Privacy Violations

Accidental and/or incidental violations of privacy or those violations due to lack of proper education may be handled by retraining and re-evaluation of processes. Oral warnings with discussion of policy and procedures could occur. Examples of these violations are: improper disposal of PHI; improper protection of medical records or other PHI; not properly verifying individuals on the phone, in person, or in writing; not accounting for disclosures (outside of treatment, payment, or operations) on the "Record of Disclosure" form. Purposeful violations of privacy without intent to do harm may be handled by retraining and re-evaluation of processes. Written warnings could occur. Examples of these violations are accessing or using PHI without a legitimate need to do so or not forwarding appropriate information or requests to proper contact personnel or Privacy Officer. Purposeful violations of patient privacy with the potential to do harm may result in termination. Examples of these would include knowingly disclosing PHI to unauthorized entities or the sale of PHI to any source.

Training Requirements for HIPAA

Each new employee is to be trained in the HIPAA law within 45 days of hire. This will occur by individual appointment with the Privacy Officer. It is the employee's responsibility to set up this training appointment. Training will include general HIPAA information and specific information with respect to the employee's position. We will periodically have continuing training regarding HIPAA at least yearly.

Patients Right to File a Privacy Complaint

Each employee should be aware that if a patient feels his privacy has been violated he has the right to file a complaint with our Privacy Officer. The patient also has the right to file his complaint with the Office of Civil Rights. Please refer these patients to the Privacy Officer, Mark Koyle, at the Art City site. He will have them file their complaint on a company form and give the patient information on how to contact the OCR, if requested to do so.

Verification and Identification of Outside Requesters

Whenever a person outside of our company requests information to be disclosed, we must first determine if they have the right to the disclosure and then ensure the identity of the requester. Every employee must verify the identity of the person requesting

PHI either in person, verbally, or via written request when the employee does not personally know that person.

Identification verification can be either number 1 or number 2 of the following options:

1. Valid State/Federal Issue Photo ID (i.e., passport, government ID, driver's license);
2. Requester is able to provide a minimum of three information items from the following list of identifiers (the information may be provided verbally or in writing):
 - Patient Social Security Number (required) AND
 - Patient date of birth (required) AND
 - Any one of the following:
 - *Account number
 - *Street address
 - *Insurance carrier name
 - *Insurance policy number
 - *Birth certificate
 - *Insurance card

Unacceptable forms of ID are Employment ID cards, Student ID cards, Membership cards, generic billing statements (utility bills), SSI cards, or Credit cards (photo or non-photo).

Patient Privacy Monitoring

Patient privacy is of utmost importance. This issue should become a second nature culture to the employee, and as such, it will be the responsibility of each employee to consciously be aware of privacy issues. To monitor this, the Privacy Officer will conduct periodic compliance "walk throughs" looking for areas of concern. However, if an employee sees a privacy issue that needs attention, it should be brought to the attention of the Privacy Officer as soon as possible.

CVMG Identity Theft Prevention and Detection and Red Flag Rule Compliance

Policy

It is the policy of Canyon View Medical Group (hereafter CVMG) to follow all federal and state laws and reporting requirements regarding identity theft. Specifically, this policy outlines how CVMG will (1) identify, (2) detect and (3) respond to “red flags.” A “red flag” as defined by this policy includes a pattern, practice, or specific account or record activity that indicates possible identity theft.

It is the policy of CVMG that this Identity Theft Prevention and Detection and Red Flags Rule Compliance program is approved by CVMG Executive Committee as of April 21, 2009, and that the policy is reviewed and approved no less than annually.

It is the policy of CVMG that our HIPAA Compliance Officer is assigned the responsibility of implementing and maintaining the Red Flags Rule requirements. Furthermore, it is the policy of CVMG that this individual will be provided sufficient resources and authority to fulfill these responsibilities. At a minimum, it is the policy of CVMG that there will be one individual or job description designated as the Privacy Official.

It is the policy of CVMG that, pursuant to the existing HIPAA Security Rule, appropriate physical, administrative and technical safeguards will be in place to reasonably safeguard protected health information and sensitive information related to patient identity from any intentional or unintentional use or disclosure.

It is the policy of CVMG that its business associates must be contractually bound to protect sensitive patient information to the same degree as set forth in this policy. It is also the policy of CVMG that business associates who violate their agreement will be dealt with first by an attempt to correct the problem, and if that fails, by termination of the agreement and discontinuation of services by the business associate.

It is the policy of CVMG that all members of our workforce have been trained by the May 1, 2009 compliance date on the policies and procedures governing compliance with the Red Flags Rule. It is also the policy of CVMG that new members of our workforce receive training on these matters within a reasonable time after they have joined the workforce. It is the policy of CVMG to provide training should any policy or procedure related to the Red Flags Rule materially change. This training will be provided within a reasonable time after the policy or procedure materially changes. Furthermore, it is the policy of CVMG that training will be documented, indicating participants, date and subject matter.

I. Identification of Red Flags

The following will be considered red flags:

1. Alerts, notification and warnings received from consumer reporting agencies of service providers of the practice
 - Report of fraud or other alert accompanying a credit or consumer report
 - Notice of a credit freeze in response to a request for a consumer report
 - Report, such as from one of our service providers, indicating a pattern of activity that is inconsistent with the history and usual pattern of activity of a patient account
2. Suspicious documents
 - Identification document that physically appears to be forged, altered or otherwise not authentic

- Identification document on which a person's photograph or physical description is not consistent with the person presenting the document
 - A patient who has an insurance number but never produces an insurance card or other physical documentation of insurance (unless CVMG can confirm that there is a legitimate reason for the absence of such documentation)
 - Other document containing information that is not consistent with existing patient information (such as if a person's signature appears forged, based on previous instances of the person's signature on file)
3. Suspicious personal identifying information
- Identifying information presented that is inconsistent with other information the patient provides (e.g., inconsistent birth dates)
 - Identifying information presented that is inconsistent with other sources of information (e.g., identification number presented that does not match a number on the person's insurance card)
 - Identifying information presented that is the same as information shown on other documents that were found to be fraudulent
 - Identifying information presented that is consistent with fraudulent activity (e.g., invalid phone number or fictitious billing address)
 - Identifying information presented that is the same as information provided as identifying information by another patient
 - A patient failing to provide complete identifying information on any patient information form when reminded to do so and CVMG is not prohibited by law from requiring the information be provided
 - A patient providing identifying information that is not consistent with the information CVMG has on file for the patient
4. Suspicious account or medical record activity
- Payments stop on an otherwise consistently up-to-date account
 - Mail sent to the patient is repeatedly returned as undeliverable
 - Breach in CVMG's computer system security
 - Unauthorized access to or use of covered account information
 - Records showing medical treatment that is inconsistent with a physical examination or with a medical history as reported by the patient (e.g., discrepancies of age, race, blood type or other physical descriptors)
5. Alerts from others
- A complaint or question from a patient based on the patient's receipt of:
 - A bill for another individual
 - A bill for a product or service that the patient denies receiving
 - A bill from a health care provider that the patient never patronized
 - A notice of insurance benefits or Explanation of Benefits for health services never received
 - A complaint or question from a patient about the receipt of a collection notice from a bill collector
 - A complaint or question from a patient about information added to a credit report by CVMG or the patient's insurer
 - A dispute of a bill by a patient who claims to be the victim of any type of identity theft
 - A patient or insurance company report that coverage for legitimate medical services is denied because insurance benefits have been depleted or a lifetime cap has been reached
 - A notice or inquiry from an insurance fraud investigator regarding a patient's account (which could indicate internal or external identity theft)
 - A notice or inquiry from a law enforcement agency regarding possible identity theft in connection with a covered account held by CVMG

- A notice from a victim of identity theft regarding possible identity theft in connection with a covered account held by CVMG

II. Detection of red flags: CVMG practice staff will be alert for discrepancies in documents and patient information that suggest risk of identity theft or fraud. CVMG will verify patient identity, address and insurance coverage at the time of patient registration/check-in.

Procedure:

1. When a new patient or a patient who has not been seen in the last 6 months calls to request an appointment, the patient will be asked to bring the following at the time of the appointment:
 - Driver's license or other photo ID
 - Current health insurance card, and
 - Utility bills or other correspondence showing current residence if the photo ID does not show the patient's current address. If the patient is a minor, the patient's parent or guardian should bring the information listed above.
2. When the patient arrives for the appointment, the patient will be asked to produce the information listed above. **This requirement may be waived for patients who have visited the practice within the last six months.**
3. If the patient has not completed the registration form, within the last six months, registration staff will verify current information on file and, if appropriate, update the information.
4. Staff should be alert for the possibility of identity theft in the following situations:
 - The photograph on a driver's license or other photo ID submitted by the patient does not resemble the patient
 - The patient submits a driver's license, insurance card, or other identifying information that appears to be altered or forged
 - Information on one form of identification the patient submitted is inconsistent with information on another form of identification or with information already in the practice's records
 - An address or telephone number is discovered to be incorrect, non-existent or fictitious
 - The patient fails to provide identifying information or documents
 - The patient's signature does not match a signature in the practice's records.
 - The Social Security number or other identifying information the patient provided is the same as identifying information in CVMG's records provided by another individual, or the Social Security number is invalid.

III. Respond to Red Flags. If an employee of CVMG detects fraudulent activity or if a patient claims to be a victim of identity theft, CVMG will respond to and investigate the situation. If the fraudulent activity involves protected health information (PHI) covered under the HIPAA security standards, CVMG will also apply its existing HIPAA security policies and procedures to the response.

Procedure

If potentially fraudulent activity (a red flag) is detected by an employee of CVMG:

1. The employee should gather all documentation and report the incident to his or her immediate supervisor.
2. The immediate supervisor will investigate the red flag and determine whether or not the activity is fraudulent or authentic.

3. If the activity is determined to be authentic, supervisor must document the red flag and actions proving authenticity in writing and turn that documentation in to the security officer.
4. If the activity is determined to be fraudulent, then CVMG should take immediate action. Actions may include:
 - The CVMG security officer should be apprised of the red flag and the outcome of the initial investigation (necessary step).
 - The security officer may take over the investigation if the situation warrants it.
 - The transaction should be cancelled.
 - Appropriate law enforcement should be notified.
 - The affected patient should be notified.
 - The affected physicians(s) should be notified.
 - There should be an assessment by the security officer on impact to CVMG.

If a patient claims to be a victim of identity theft:

1. The patient should be encouraged to file a police report for identity theft if he/she has not already done so.
2. The patient should be encouraged to complete the ID Theft Affidavit developed by the FTC, along with supporting documentation.
3. CVMG will compare the patient's documentation with personal information in the practice's records.
4. If following investigation, it appears that the patient has been a victim of identity theft, CVMG will promptly consider what further remedial act/notifications may be needed under the circumstances.
5. The physician will review the affected patient's medical record to confirm whether documentation was made in the patient's medical record that resulted in inaccurate information in the record. If inaccuracies due to identity theft exist, a notation should be made in the record to indicate identity theft.
6. The practice medical records staff will determine whether any other records and/or ancillary service providers are linked to inaccurate information. Any additional files containing information relevant to identity theft will be removed and appropriate action taken. The patient is responsible for contacting ancillary service providers.
7. If following investigation, it does not appear that the patient has been a victim of identity theft, CVMG will take whatever action it deems appropriate.