

Section 100 - Administrative

100.01 Contracting with Business Associates Policy

Policy Number:	100.01	Issue Date:	
Title:	Contracting with Business Associates Policy	Review Date:	
Section:	Administrative	Revision Date:	
Department Approvals:		Approved By:	
CAAS Number (s):			

Purpose

CONFIRE EMS & Mobile Health is responsible for ensuring the privacy and security of all protected health information ("PHI") that we create, receive, maintain, or transmit under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). HIPAA requires that CONFIRE EMS & Mobile Health ensure that those persons and entities that perform services on our behalf using PHI agree to protect that PHI as we would by requiring those parties to sign a "business associate agreement" ("BAA") with CONFIRE EMS & Mobile Health. This policy describes our approach to entering into business associate agreements with persons and organizations that perform services on our behalf involving PHI.

Scope

This policy applies to all CONFIRE EMS & Mobile Health employees.

Employees are expected to adhere to this procedure. Failure to comply will result in corrective action up to and including termination of employment.

Procedure

1. Each operation should coordinate with the HIPAA Privacy Officer to identify persons and organizations that perform services on our behalf and who in any manner create, receive, maintain, or transmit PHI about our patients. All such persons or entities are called "business associates" ("BAs") of CONFIRE EMS & Mobile Health. For example, our business associates include, but are not limited to, our outside billing company, our outside consultants, and our outside attorney.

Workforce members are not business associates, nor are organizations that share a direct treatment relationship with patients to whom CONFIRE EMS & Mobile Health provides services. When in doubt, the HIPAA Privacy Officer should consult qualified legal counsel when determining whether an entity meets the legal definition of a BA.

2. All identified BAs of CONFIRE EMS & Mobile Health must enter into a BAA if they wish to do business with us. Even if we do not have a written services contract with a party, HIPAA requires a written business associate agreement with all BAs. No disclosures of PHI will be made by CONFIRE EMS & Mobile Health to a BA until the BAA has been signed.
3. CONFIRE EMS & Mobile Health will use its standard business associate agreement whenever possible. If the BA insists on using its own business associate agreement, the HIPAA Privacy

Officer must ensure that the agreement proposed by the BA conforms to HIPAA's requirements.

4. Whenever CONFIRE EMS & Mobile Health modifies its existing business associate agreement, the HIPAA Privacy Officer shall ensure we enter into a new agreement with our current BAs.
5. Whenever possible, all contracts and service agreements between CONFIRE EMS & Mobile Health and any BA should include the relevant business associate language directly in the contract or service agreement. Otherwise, a stand-alone business associate agreement is required. If a business associate agreement is separate from the main contract or service agreement, the main agreement must specifically refer to the business associate agreement.
6. The HIPAA Privacy Officer will maintain a current list of business associates.
7. At times, CONFIRE EMS & Mobile Health may be asked to enter into business associate agreements. The HIPAA Privacy Officer shall evaluate the appropriateness of the business associate agreement under the circumstances and enter into the agreement only when required by law and if the agreement meets the legal requirements under HIPAA.
8. The HIPAA Privacy Officer is responsible for maintaining BA agreements on file for periodic review and inspection.
9. Concerning a person or entity that is not a BA but may potentially come into contact with PHI, such as janitorial services or information technology service providers, the HIPAA Privacy Officer should seek to have a "Confidentiality Agreement" in place with the entity.

100.02 Conflict Resolution with External Agencies / Customer Complaints and Interagency Dialogue Policy

Policy Number:	100.02	Issue Date:	
Title:	Conflict Resolution with External Agencies / Customer Complaints and Interagency Dialogue Policy	Review Date:	
Section:	Administrative	Revision Date:	
Department Approvals:		Approved By:	
CAAS Number (s):	101.02- 101.02.01- 102.03 - 102.03.01 - 102.04- 102.04.01- 103.01- 103.01.01- 105.02 - 105.02.02		

Purpose

CONFIRE EMS & Mobile Health Service strives to maintain excellent relationships with patients, patients' families, hospital staff, public safety personnel, and other health care providers. To that end, employees are responsible for conducting themselves professionally as defined in the CONFIRE EMS & Mobile Health Policy and Procedures Manual, employee handbook, personnel rules, or other company documents. However, occasionally, complaints may arise; therefore, they must be addressed as expeditiously as possible to ensure good relations with the parties mentioned above.

Scope

This policy applies to all CONFIRE EMS & Mobile Health employees.

Employees are expected to adhere to this procedure. Failure to comply will result in corrective action up to and including termination of employment.

Procedure

Customer/External Agency Complaint

Complaints and/or concerns received will be immediately referred to the On-Duty Operations Supervisor. The On-Duty Operations Supervisor is responsible for completing an electronic "Complaint Report Form." The supervisor must conduct a thorough investigation in an attempt to resolve the problem if at all possible. The electronic "Complaint Report Form" or recommendations regarding the need for further action will be referred to the appropriate Department Manager or appropriate designee for review and follow-up (if necessary) per the following areas of responsibility:

General Operations Complaints	Operations Department
Patient Care Issues/Policy Violations/Protocol Deviations State or Federal Compliance Issues/Liability Issues	Medical Director/Human Resources Department
Communications Complaints	Communications Center
Equipment/Vehicle Issues	Fleet Department
Billing Issues	Documentation Quality Assurance

The appropriate Manager is ultimately responsible for ensuring the implementation and coordination of the complaint process. Ideally, a resolution to all complaints should be completed within 48 hours of receipt, and the complainant should be notified of the disposition.

Upon completing the electronic complaint report and investigation, the completed report will be submitted electronically to the appropriate department manager and/or supervisor.

The department manager will review the electronic report and ensure that it is maintained in the electronic database. The EMS Director or designee is responsible for generating statistical reports detailing customer complaints for trend-reporting purposes.

Any complaint that may have legal implications requires the Executive Director, Deputy Executive Director, EMS Director, and appropriate legal counsel to be notified immediately.

Should the investigation indicate a need to take corrective action within CONFIRE EMS & Mobile Health Service (e.g., policy change, employee corrective action, etc.), the action will be taken consistent with CONFIRE EMS & Mobile Health policies, procedures, and work rules.

Conflict Resolution

In the event that an employee wishes to lodge a formal complaint against an external agency, they are to follow the procedure outlined in Policy #106 (Reporting of Unusual Events or Circumstances). Upon receipt of the electronic Incident Report and after meeting with the affected personnel, the responsible Department Manager and/or designee, as outlined above, will contact external agency representatives within 24 hours of the initial complaint.

All efforts will be made to resolve the situation within 48 hours. All personnel involved in the incident will be informed of the status of the investigation, including the decision(s) made regarding the resolution of the problem. All completed electronic incident reports are automatically forwarded to the appropriate department manager for review.

Upon completion of the incident and/or complaint review, the department manager and/or designee will note in the administrative section of the electronic report with their findings and/or approval and then forward the electronic report to the Human Resources (HR) Department. HR is responsible for maintaining a tracking system of all complaints. Complaints will be tracked following the specific area of responsibility (Operations, Billing, etc.). These records will be available for review upon the appropriate and authorized request.

Interagency Dialogue

It is the policy of CONFIRE EMS & Mobile Health Service to maintain an ongoing dialogue with area EMS providers, public safety agencies, hospitals, skilled nursing facilities, and other healthcare and governmental agencies.

It is the goal of CONFIRE EMS & Mobile Health Service to provide a representative on any committee that may impact the field of emergency services and/or medical transportation. CONFIRE EMS & Mobile Health will ensure this representation is on a local, state, and national level.

It is optimally the responsibility of the Administration team to ensure that the representation of CONFIRE EMS & Mobile Health Service is achieved. At a minimum, the Executive Director, or a designee, is responsible for attending the quarterly, monthly, and/or called meetings of the following:

- Any County and Governmental Association
- Any other required meetings

At the discretion of the Executive Director, other departmental managers may be required to attend other meetings and/or committees not specifically addressed above and/or when new committees are developed.

It is also the policy of CONFIRE EMS & Mobile Health Service to attend all local area government meetings designated to discuss EMS-related topics and/or EMS service responsibilities in areas where CONFIRE EMS & Mobile Health provides primary service.

It is the primary goal of CONFIRE EMS & Mobile Health to participate in all EMS-related committees and provide representation at community meetings to ensure an open line of communication between the various agencies and customers we serve.

100.03 Recycling Policy

Policy Number:	100.03	Issue Date:	
Title:	Recycling Policy	Review Date:	
Section:	Administrative	Revision Date:	
Department Approvals:		Approved By:	
CAAS Number (s):			

Purpose

The purpose of this policy is to guide CONFIRE EMS & Mobile Health regarding the recycling program and to:

- Comply with San Bernardino County Contract 23-1282 recycling provisions.
- Comply with the California Green Building Standards Code (CalGreen), requiring waste diversion from specified construction and demolition projects.
- Comply with state and county commercial recycling laws, requiring recycling by certain specified businesses.
- Comply with state and county commercial organic waste recycling laws, requiring organic waste recycling for certain specified businesses.

Scope

This policy applies to all CONFIRE EMS & Mobile Health employees.

Employees are expected to adhere to this procedure. Failure to comply will result in corrective action up to and including termination of employment.

Definitions

"Recyclable materials" or "recyclables." Non-organic, reusable waste materials, including, but not limited to, metal, glass, and plastic, are to be collected, separated, or processed and used as raw materials. "Recyclables" may include paper products, printing and writing paper, wood, dry lumber, and textiles.

"Recycle" or "recycling." Collecting, sorting, cleansing, treating, and reconstructing materials that would otherwise become refuse or garbage and returning them to the economic mainstream in the form of raw material for new, revised, or reconstituted products that meet the quality standards necessary to be used in the marketplace. This includes, without limitation, items intended for "re-use" or "personal use," irrespective of their intended return to the economic mainstream or marketplace.

"Recycled-content paper" means paper products and printing and writing paper that consists of at least thirty percent (30%) by fiber weight, post-consumer fiber, or as otherwise defined in 14 CCR § 18982(a)(61).

Procedure

Collection containers for organic waste and recyclables must be provided in all areas where disposal containers are offered to customers/employees.

A green container shall be provided for the collection of organic waste. The green container shall only collect organic waste and not non-organic waste.

The blue container shall be provided for collecting non-organic recyclables only. However, it may include the following types of organic waste: paper products, printing and writing paper, wood and dry lumber, and textiles.

The gray container shall be for the collection of non-organic waste only.

Environmental Practices

In accordance with County Policy 11-08, the County prefers to acquire and use products with higher levels of post-consumer recycled content. Environmentally preferable goods and materials must perform satisfactorily and be reasonably priced. Whenever possible, CONFIRE will use recycled paper for any printed or photocopied material created as a result of the Ambulance Contract. CONFIRE will also use both sides of paper sheets for reports submitted to the County whenever practicable.

CONFIRE EMS & Mobile Health is an environmentally responsible employer seeking all practical waste reduction and recycling opportunities. CONFIRE encourages its employees to recycle appropriate materials offered by the waste disposal services in the area, reduce waste volume and toxicity by using environmentally friendly packaging material whenever possible, and reuse appropriate items when possible. Also important is properly disposing of toxic, flammable, biohazard, and/or hazardous materials.

Some examples of environmentally friendly practices include:

- A. Backhauling product packaging to the supplier for reuse or recycling.
- B. Shipping in bulk or reduced packaging.
- C. Using soybean-based inks for packaging printing.
- D. Use recycled product packaging or recyclable or reusable packaging material.

300.02 Financial Hardship Compassionate Care Policy

Policy Number:	300.02	Issue Date:	
Title:	Financial Hardship Compassionate Care	Review Date:	
Section:	Policy	Revision Date:	
Department Approvals:		Approved By:	
CAAS Number (s):			

Purpose

We understand that the cost of ambulance transport is rarely planned and can be a hardship for individuals who do not have insurance. We have developed this policy to assist individuals who may be uninsured, underinsured, or suffering financial hardship. We aim to establish a CONFIRE policy that allows the modifying of EMS charges based on current year Department of Health and Human Service Poverty guidelines.

Scope

As authorized by Health and Safety Code sections 13917 and 13919, this policy pertains to all patients treated or transported by CONFIRE.

Each patient may request one (1) hardship modification per consecutive twelve (12) month period. CONFIRE is committed to non-discrimination. This policy applies to all patients without regard for the person's sex, race, color, religion, ancestry, national origin, disability, medical condition, genetic information, marital status, sexual orientation, citizenship, primary language, or immigration status.

Preface

EMS charges may be waived, reduced, or a payment plan established based upon financial hardship, as determined by CONFIRE. These procedures will ensure a just and fair evaluation of a hardship waiver request and will establish an audit trail for future use.

Objectives

- 1) *No one will EVER be denied necessary medical transport service due to either their inability to pay or a lack of insurance.*
- 2) Every effort will be made to collect from insurance for payment; after insurance makes the payment, CONFIRE, or its designee, will NOT attempt to collect the remaining balance from the patient.
- 3) CONFIRE will address cases of financial hardship on an individual basis.

Procedures

- 1) Patients who are unable to pay their co-pays, deductibles, who are uninsured, unemployed, homeless, or for other reasons unable to make payments may request a financial hardship review of their EMS charges. Patients, or their designee, shall complete a CONFIRE "Financial Hardship/Compassionate Care Program Application Form". The form may be requested from Wittman Enterprises, LLC by calling (800) 906-6552, by mail to Wittman Enterprises, LLC P.O. BOX 269110, Sacramento, CA 95826, or downloaded from the CONFIRE Website.

- 2) The completed Financial Hardship/Compassionate Care Program application and supporting documentation shall be submitted to Wittman Enterprises.
- 3) When complete, the Financial Hardship/Compassionate Care Program Application Form and supporting documents will be forwarded to the CONFIRE EMS Subcommittee (or their appointed designee) to make a final decision. The EMS Subcommittee (or their appointed designee) may waive all charges, reduce the charges, establish a payment plan, or deny the request. All final resolutions will be noted on the form.
- 4) CONFIRE will render a decision on the financial hardship/compassionate care request within 90 days of receipt of the complete application and supporting documentation. No collection activities will progress while an account is under review for hardship/compassionate care consideration.
- 5) If approved for modification, a copy of all documentation will be made and will be held in CONFIRE files for a period of five years. The original form will be transmitted to the billing company authorizing the modification or elimination of the patient's charges. CONFIRE will notify the patient in writing as to the final disposition of the Hardship Waiver.
- 6) CONFIRE will consider 125% of the current HHS Poverty Guidelines as a guideline in granting a hardship waiver.
- 7) After a final decision has been rendered on the hardship application, CONFIRE will gather patient demographic information from the patient care report and document this for tracking and reporting purposes. This information will not be considered while the hardship application is under review. The Administrative Committee will receive an annual report that details the past year's hardship activities, including demographic trends.

Payment Plans

- 1) All payment plans are 0% interest.
- 2) Payment plans can routinely be set for up to 12 months.
- 3) Refer to Table 1: Account Balance and Max Payment Plan Length.

Table 1: Account Balance and Max Payment Plan Length

Account Balance	Maximum Payment Plan Length
<u>\$500 and Above</u>	<u>12 months; If this is not doable, see Supervisor on a case-by-case basis</u>
<u>Below \$500</u>	<u>6 months; If this is not doable, see Supervisor on a case-by-case basis</u>
<u>Below \$50</u>	<u>See Supervisor on a case-by-case Supervisor</u>

**CONFIRE EMS AND MOBILE HEALTH
EMERGENCY MEDICAL SERVICES CHARGES
FINANCIAL HARDSHIP/COMPASSIONATE CARE
PROGRAM APPLICATION**

**(Note: A hardship application must be submitted for each EMS Financial
Hardship/Compassionate Care Fee Adjustment Request)**

Applicant Name:

SSN:

Applicant Address:

Contact Number:

Date of EMS Transport:

Service Requesting:

- My EMS charges to be waived.
- My EMS charge to be reduced.
- Establishment of a payment plan for my EMS charge that better suits my ability to pay.

Monthly household gross income:

Number of dependents living in household:

In order for your application to be considered for approval, one or more of the below documents must be submitted with your application:

- W-2 withholding statements or unemployment check stubs for past 90 days.
- Paycheck stubs for the past 90 days for all persons employed in the home.
- Income tax return (most recent signed)
- Any other information you wish to provide that will help in our decision-making process.

Responsible Party (if different from applicant):

Name:

Relationship:

Address (if different from the above applicant):

Contact Number:

**CONFIRE EMS AND MOBILE HEALTH
EMERGENCY MEDICAL SERVICES CHARGES
FINANCIAL HARDSHIP/COMPASSIONATE CARE
PROGRAM APPLICATION**

In your own words, explain why you are requesting a Hardship Waiver:

I do hereby request that I, as either the applicant or the party who is financially responsible for the applicant, be considered for a reduction in the payment responsibilities as they relate to this EMS transport service fee. **By signing this form, I certify that I am uninsured and currently have no insurance that can be billed for this charge. I declare that all of the information contained here within this document, along with all attachments, is true and accurate. Furthermore, I understand that I will be held liable for any false statements and/or information provided pertaining to this waiver request.** I hereby agree to notify CONFIRE EMS and Mobile Health of any change to the financial status of the applicant, or responsible party, which may affect their ability to pay the EMS charges.

Signature:

Date:

Print Name:

For questions regarding the hardship waiver process, please contact CONFIRE EMS and Mobile Health at 909-356-2334 or via e-mail at emsreports@confire.org.

Applications with all attachments should be mailed to:

Wittman Enterprises, LLC
PO BOX 269110
Sacramento, CA 95826



400.06P Comfort Station Utilization Policy

Policy Number:	400.06P	Issue Date:	
Title:	Comfort Station Utilization Policy	Review Date:	
Section:	Operations	Revision Date:	
Department Approvals:		Approved By:	
CAAS Number (s):			

Purpose

The purpose of this policy is to ensure the proper visitation behavior of all employees while visiting CONFIRE Agency facilities as guests.

Scope

This policy applies to all CONFIRE EMS & Mobile Health employees.

Employees are expected to adhere to this procedure. Failure to comply will result in corrective action up to and including termination of employment.

Definitions

Ambulance Station: A station where an ambulance can be located in or under cover and can house a 2-person crew with bunk space, restrooms, and general living quarters.

Comfort Station: Designated location where ambulance crews can stop by for rest/relaxation and staging. A comfort station would provide ambulance members with a restroom, access to the kitchen, general living quarters, day room, or recliner TV area. No dorm room is needed.

Change of Shift Station: A location where crews can change shifts and ensure ambulances and equipment are fully stocked and ready to respond. A shift change location includes a place where crew members can park personal cars and store EMS equipment and supplies in designated rooms or cabinets.

Procedure

Fire stations are designed and intended to house fire department personnel (firefighters) and their applicable equipment. Certain CONFIRE Agency Fire Stations and facilities will also be designated comfort stations for CONFIRE EMS & Mobile Health employees while on duty to assist with response times and fatigue. This opportunity to be allowed into the comfort stations must be held in high regard, as misconduct or improper use of the station may cause the removal of such opportunities.

CONFIRE EMS & Mobile Health employees are responsible for conducting themselves in a manner that reflects proper ethical behavior and integrity. As such, all employees will abide by the following as guests of the fire department:



1. All CONFIRE EMS & Mobile Health employees shall remain in full uniform with identification at all times in the fire station. Identification will be immediately available to Fire Department personnel upon request.
2. Employees will conduct themselves in a manner that reflects positively on themselves, CONFIRE EMS, and the fire department.
3. Employees will be respectful and conscious of all individuals' safety and welfare.
4. Employees shall show respect to all Fire Department personnel at all times.
5. Employees shall ensure their designated space in the fire station is clean and kept within the established cleaning standards of the fire department at all times.
6. Non-fire department personnel are prohibited from using Fire Department tools or equipment, such as apparatus and power tools, for safety.
7. Employees' personal items shall not remain on the premises of the Fire Department unless the employee is present. All personal items are the responsibility of the employees and must stay with the employee at all times.
8. Use of designated recreational rooms, kitchens, and bunk rooms is at the sole discretion of the fire department. Areas of use must be kept clean at all times.

Note: All CONFIRE EMS policies and procedures shall be honored and upheld while visiting any fire station or facility. Failure to comply with the company's pre-established policies and procedures will result in corrective action up to and including removal of comfort station privileges and/or discipline up to termination of employment.

200.17 Pre-Employment and Ongoing Physical & Mental Health Evaluation Policy

Policy Number:	200.17	Issue Date:	
Title:	Pre-employment Emotional & Physical Health Evaluation Policy	Review Date:	
Section:	Human Resources	Revision Date:	
Department Approvals:		Approved By:	
CAAS Number (s):			

Purpose

The purpose of this policy is to provide guidelines for all CONFIRE EMS & Mobile Health personnel regarding mandatory pre-employment and ongoing physical & mental health evaluations.

Scope

This policy applies to all CONFIRE EMS & Mobile Health employees.

Procedure

DOT Medical Exam and Commercial Motor Vehicle Certification

The DOT Medical Exam is a pre-requisite for applying for an Ambulance Driver Certificate. It is required that all CONFIRE EMS & Mobile Health employees designated as field personnel and all those who have the potential to work in the field receive a DOT Medical Exam and Commercial Motor Vehicle Certification.

The Department of Transportation (DOT) physical examination must be conducted by a licensed medical examiner listed on the Federal Motor Carrier Safety Administration (FMCSA) National Registry.

Employee's DOT physical exam is valid for up to 24 months. Medical examiners may issue a certificate for less than 24 months if needed. Employees are responsible for obtaining an updated DOT physical before their previous exam expires.

If the medical examiner passes the employee as physically qualified to drive an ambulance, the medical examiner will provide one copy of the results to the employee and complete a Medical Examiner's Certificate.

The employee is responsible for providing their HR representative with the required documents for employment.

Telehealth Services

CONFIRE EMS & Mobile Health's telehealth service, OnDemand Visit, is available to employees 24/7. Employees' emotional and physical well-being shall be reevaluated every year during their annual review through OnDemand Visit.



400.12P Minimum Rest Requirements Policy

Policy Number:	400.12	Issue Date:	
Title:	Minimum Rest Requirements Policy	Review Date:	
Section:	Operations	Revision Date:	
Department Approvals:		Approved By:	
CAAS Number (s):	103.01 - 103.01.01		

Policy

Emergency Medical Services is extremely demanding and stressful, requiring personnel to make life-and-death decisions each shift. CONFIRE EMS & Mobile Health places a great deal of responsibility on each of our employees in the performance of their assigned duties. Consequently, it discourages employees from participating in any other employment that would make them unfit to perform essential job functions. Employees are encouraged to get plenty of rest before coming to work. Outside interests and/or commitments must not interfere with the employee's ability to perform their job responsibilities.

Therefore, CONFIRE EMS & Mobile Health requires that personnel reporting for duty or work assignments have received adequate rest and are not fatigued.

Scope

This policy applies to all CONFIRE EMS & Mobile Health employees.

Employees are expected to adhere to this procedure. Failure to comply will result in corrective action up to and including termination of employment.

Procedure

In order to ensure that personnel are well rested and can perform their essential job functions without fatigue, CONFIRE EMS & Mobile Health recommends that employees obtain a minimum of eight (8) hours of uninterrupted sleep/rest within the twelve hours immediately preceding their assigned shift. Personnel who report for duty and cannot perform their work assignments safely, as determined by management, will forfeit their shift and be relieved from duty. Continuous violations of this policy can result in discipline, up to, termination of employment.



800.26 Vehicle Operations Policy

Policy Number:	800.26	Issue Date:	
Title:	Vehicle Operations Policy	Review Date:	
Section:	Vehicles, Apparatus & Equipment	Revision Date:	
Department Approvals:		Approved By:	
CAAS Number (s):	103.01 - 103.01.01 - 202.01 - 202.01.01 - 202.01.02 - 202.01.03 - 202.01.04		

Policy

Responding to any emergency or non-emergency call, CONFIRE EMS & Mobile Health places a great deal of responsibility on the operators of company vehicles. Not only must CONFIRE EMS & Mobile Health vehicle operators provide prompt conveyance of the vehicle, equipment, and personnel to provide service to those in need, but as importantly, must accomplish this task in the safest and most prudent manner possible.

CONFIRE EMS & Mobile Health vehicle operators have in their care, custody and control of the most major assets of this organization (the vehicle, portable equipment, personnel). CONFIRE EMS & Mobile Health vehicle operators also have a higher standard of care to provide to the general motoring public and must make every attempt possible to provide due-regard for the safety of others. CONFIRE EMS & Mobile Health vehicle operators must constantly monitor and reduce the amount of risk and exposure to potential losses during each and every response. Safe arrival at the emergency and non-emergency scene shall be, and must always remain, the first priority of all CONFIRE EMS & Mobile Health vehicle operators.

The operator of any Priority or CONFIRE owned or sponsored vehicles may be required to reimburse the company for any and all damages related to not following the established policies and procedures. Priority or CONFIRE further reserves the right to suspend or terminate any employee who fails to comply with the established policies and procedures. All CONFIRE EMS & Mobile Health employees shall become familiar with and constantly abide by the following policies and procedures.

Scope

This policy applies to all CONFIRE EMS & Mobile Health employees.

Employees are expected to adhere to this procedure. Failure to comply will result in corrective action up to and including termination of employment.

Procedure

1. GENERAL GUIDELINES

- ***Physical And Mental Requirements for Company Vehicle Operations:***

All Employees must be physically and mentally capable, alert and prepared for duty in order to engage in any form of vehicle operations. It is the responsibility of the



employee to report any problem or incapacity to the appropriate supervisor prior to engaging in any vehicle operations.

All employees must be alert and well rested prior to engaging in any form of vehicle operations with a CONFIRE EMS & Mobile Health vehicle. Employees should not have consumed alcohol within 8 Hrs. of the designated shift. Employees must never engage in any illegal substance abuse while employed with CONFIRE EMS & Mobile Health. Employees are required to report any prescription medication given or prescribed by a physician that will affect their ability to operate any type of machinery to a supervisor prior to engaging in company vehicle operations.

All employees must report the use of over-the-counter medications that may affect judgment or have drowsiness as an affect of the medication to a supervisor, prior to engaging in any company vehicle operation. Any employee, who is sick, excessively fatigued or experiencing any medical problem must report the problem to their immediate supervisor prior to engaging in any vehicle operation.

- **Maximum On-Duty Time:**

Employees assigned to a twenty-four-hour shift should not be allowed to work more than 24 consecutive hours without adequate rest time. Safety is paramount in all tasks and operational functions. At no time will an employee be placed in a position to operate a company vehicle or render critical patient care if that employee has declared him or herself unable to safely perform appropriate actions and responsibilities due to personal fatigue.

It is the employee's responsibility to inform their immediate supervisor that personal fatigue has or will soon become a factor.

- ***Prohibition On The Use Of Tobacco And Tobacco Products In And Around Company Vehicles:***

The use of tobacco products of any type within a CONFIRE EMS & Mobile Health vehicle or around the vehicle or equipment components is strictly prohibited. Smoking within 15 Ft of a CONFIRE EMS & Mobile Health vehicle is prohibited.

- ***Prohibition Against Horseplay In And Around Vehicles:***

Horseplay of any type in and around a CONFIRE EMS & Mobile Health vehicle is strictly prohibited. Persons who engage in this type of activity will be subject to corrective action in accordance with CONFIRE EMS & Mobile Health Policy & Procedures.

- ***Prohibition Against Unsafe Actions When Vehicle Is In Motion:***

Any form of unsafe operator initiated actions and / or horseplay when the vehicle is in motion (such as racing other vehicles / ambulances) is strictly prohibited. Persons who



engage in this type of activity will be subject to corrective action in accordance with CONFIRE EMS & Mobile Health Policy & Procedures.

- ***Restriction Against Improper Body Positioning/ Posturing On The Units In Motion:***

Riding or standing on any part of the vehicle outside when the unit is in motion is prohibited. Extending the body or body parts outside of the unit is prohibited. Opening or keeping the vehicle doors open during vehicle movement is prohibited.

- ***Restriction and Minimization Of Communications And Communications Devices While Operating CONFIRE EMS & Mobile Health Vehicles:***

Employees are prohibited from utilizing any cell phone and/or text messaging device while operating a company vehicle, regardless of circumstances (Personal or Business). When a vehicle is manned by two personnel, any radio communications and/or cell phone use will be conducted by the non-driving crewmember not the vehicle operator. When the vehicle operator is solo, radio communications by the operator will be limited to essential communications only. No radio traffic will be conducted by the vehicle operator during high-risk time frames to include, but not limited to, intersections and intersection approaches, backing, lane changes and or any critical maneuvers where distraction may result in collision event or other mishap.

If an employee must contact CONFIRE EMS & Mobile Health for company business while operating a company vehicle and/or their personal vehicle, the employee should pull the vehicle to a safe area, place the vehicle in park and then may utilize their cell phone to contact CONFIRE EMS & Mobile Health. CONFIRE EMS & Mobile Health will accept no responsibility for damage to an employee's personal vehicle as a result of conducting company business while using a cell phone.

CONFIRE EMS & Mobile Health also prohibits the use of am/fm radio headsets, IPOD Devices, and/or any device that would obstruct the vehicle operators hearing and/or distract the vehicle operator from the safe operations of the vehicle.

- ***Prohibition Against Vehicle Vandalism:***

Intentionally damaging or misusing any equipment or ambulance part or support equipment is strictly prohibited. Any person(s) engaged in such activity will be subject to corrective action in accordance with CONFIRE EMS & Mobile Health Policy & Procedures.

- ***Vehicle Pre-Shift Inspection Requirement:***

CONFIRE EMS & Mobile Health utilizes an electronic Daily Vehicle Inspection/Inventory form for each vehicle within the organization. Employees will, prior to initiating any vehicle operation of any CONFIRE EMS & Mobile Health vehicle will conduct a complete and thorough vehicle pre-shift inspection and document the inspection on the appropriate vehicle inspection/inventory form. All discrepancies will be reported prior



to the vehicle's departure. Employees will never operate a vehicle that does not conform to required State criteria or is unsafe in any fashion.

The crew will relay the discrepancy to their immediate supervisor and the vehicle will not be utilized until the problem(s) is/are corrected. All such discrepancies will be annotated on an equipment failure form as well as the vehicle check sheet.

Failure of employee (s) to complete the pre-shift vehicle inspection/inventory form may result in the employee (s) being financially responsible for missing equipment and/or vehicle damage and will result in corrective action in accordance with CONFIRE EMS & Mobile Health Policies & Procedures.

Note: Fire Extinguisher Checks must be accomplished prior to initiating vehicle operations. Any Fire Extinguisher not secured or missing either a seal and/or Inspection tag must be immediately reported to their on-duty Supervisor. The Fire Extinguisher must be either replaced or resealed prior to initiating operations.

- **Circle Of Safety:**

Prior to entering the cab and starting the vehicle, the CONFIRE EMS & Mobile Health vehicle operator should make a circle of safety around the vehicle to see that all equipment is secured, that all compartment doors are securely closed and any physical obstructions moved out of the way. During the circle of safety, the CONFIRE EMS & Mobile Health vehicle operator should encircle the vehicle and visually inspect all 4 sides and the top of the vehicle before entering the cab. He/she should also verify right side and rear clearance with the person riding in the passenger/attendant position, if available. This shall be conducted prior to moving the vehicle regardless of whether or not the vehicle is about to leave on an emergency or a non-emergency response.

- **Requirement For Occupant Restraint System (Seatbelt) Utilization:**

CONFIRE EMS & Mobile Health requires all employees (*Vehicle Operator, Attendant, Observer, Reservist, Third Riders, Etc.*) to utilize seatbelts whenever the vehicle is in motion. This policy applies to all vehicles owned and operated by CONFIRE EMS & Mobile Health.

The attendant is required to wear a seat belt in the Patient Compartment any time he or she is not involved in Patient Care that would be impeded by Occupant Restraint System/seatbelt usage.

All patients and passengers will be secured by seat belts or stretcher restraints. Use of properly adjusted seat belts is required of all occupants riding in CONFIRE EMS & Mobile Health vehicles. Drivers of CONFIRE EMS & Mobile Health vehicles are responsible for ensuring that all passengers utilize seat belts and are responsible for physically ensuring that the appropriate restraint device is applied correctly.

- **Ambulance**



Persons in the patient compartment, including the patient, must be fully restrained using the Occupant Restraint Systems designed by the ambulance and stretcher manufacturers. CONFIRE EMS & Mobile Health personnel are prohibited from removing any part or component of the stretcher restraint system and must utilize all components of the stretcher restraint system for properly securing the patient.

All patients should be transported on the ambulance stretcher. The squad bench should only be utilized when a second patient is immobilized on a long spineboard or scoop stretcher. Only as a last resort should a patient **not** be transported on a stretcher. If circumstances dictate that a patient or other individual needs to be transported in a sitting position and not on a stretcher, the patient or individual should be secured in the attendant's chair with the appropriate restraint device applied by CONFIRE EMS & Mobile Health personnel.

- **Administrative /Ambulatory Vehicles**

Persons being transported in administrative vehicles must be fully restrained. Patients and/or family members should not be transported in the front passenger seat of administrative/ambulatory vehicles. If a situation arises that dictates that a patient and/or family member must ride in the front passenger seat, the vehicle operator will ensure that the front seat is positioned as far back from the dashboard as the seat will allow and further ensure that the front seat passenger is properly restrained and holding no items that may cause injury in the event of an accident (boxes, flower vases, etc.).

- **Children/ Car Seats**

Children may **not** be transported in a sitting position on the squad bench or attendant's chair. All children must be secured on the stretcher, secured in a pediatric immobilizer and secured on the squad bench or secured in an appropriate Child Car Seat. Children in a Child Car Seat on EMS arrival should be transported in the Child Car Seat on the ambulance stretcher with appropriate restraint devices in use. The only exception is the car seat would hinder patient care.

Children under the age of 12 should not ride in seats where airbags are present.

Any child under the age of eight (8) years that cannot be safely secured to the ambulance stretcher must be transported in a Child Car Seat. EMS personnel should ascertain if the family has a carrier or appropriate Child Car Seat to be used. If a Child Car Seat is not available from the family, CONFIRE EMS & Mobile Health has Child Car Seats available. If an ambulance or other vehicle does not have a Child Car Seat on their unit, the on-duty operations supervisor should be contacted to bring a Child Car Seat to the location. The Child Car Seat should be secured to the ambulance stretcher.

- **Securing Equipment:**



All associated medical equipment and employee personal property being transported aboard any unit will be properly secured prior to the vehicle being placed in motion.

Equipment, supplies, and patient belongings must also be restrained in the ambulance. Patient belongings which cannot be safely secured, and/or which present an obvious safety risk to the occupants, should not be transported.

- ***Seating Arrangements:***

The vehicle operator and/or attendant will ensure appropriate seating arrangements in the Patient Compartment prior to the vehicle being placed in motion.

The safest place for the patient is to be properly positioned on the stretcher with all straps and harness secured. Crews should take all steps needed to insure the stretcher is utilized for the patient. Securing the patient must be accomplished prior to any vehicle movement.

- ***Requirement For Constant Headlight Usage When Vehicle Is In Motion:***

Headlights will be on any time the vehicle is in motion, day and night.

- ***Reducing Velocity For Confined Space Areas:***

Employees are required to make an appropriate reduction of vehicle speed when approaching confined spaces, limited width areas, or hazardous areas.

- ***Drive Thru Restriction:***

Employees are prohibited from utilization of any type of vehicle drive-through for any reason at anytime with an ambulance. Banks, fast food drive-through, etc., have inherent risk factors and are considered confined spaces.

If driving the ambulance under an overhang, which is often present at hospitals and nursing homes, ensure there is appropriate vertical clearance. If not sure, use a spotter. If a spotter is not available, do not drive the vehicle under the overhang.

- ***Vehicle Parking Safety:***

Ensure that the vehicle is parked in a safe manner. Ensure it is secure from the potential of unintended motion and appropriately visible to other traffic. Never park in a manner that would impede traffic. In the non-emergency mode, always select a legally designated parking spot. In Emergency Mode, avoid blocking the roadway. Park with "Due Regard" and ensure that the vehicle is highly visible to approaching traffic. Do not try to squeeze the ambulance into a parking space where safe egress is difficult.



- **Response Speeds:**

When responding to an emergency or non-emergency, CONFIRE EMS & Mobile Health personnel understand that under **no circumstances** may they exceed the posted speed limit. Conditions requiring slower response speeds include, but are not limited to the following;

- * Slippery road conditions.
- * Inclement weather.
- * Poor visibility.
- * Heavy or congested traffic conditions.
- * Sharp curves.

Personnel that receives a speeding or other traffic citation while operating a CONFIRE EMS & Mobile Health vehicle will receive corrective action.

- **Routine Travel Procedures:**

All vehicle operators shall obey all traffic laws and traffic control devices when operating CONFIRE EMS & Mobile Health vehicles. Any vehicle operator observed breaking any traffic laws or driving any company vehicle in an aggressive manner will be subject to corrective action, including, but not limited to, suspension of driving privileges.

- **Non-Emergency Response:**

When responding to a call in a non-emergency response mode or normal flow of traffic the vehicle will be operated without any audible or visual warning devices and in compliance with all motor vehicle laws that apply to civilian traffic.

- **Administrative Vehicles:**

Managers and supervisors are authorized to use emergency signals on cars or special response vehicles in accordance with state law for the purpose of lending assistance at the scene of an accident or emergency, and to monitor patient care procedures. CONFIRE EMS & Mobile Health company vehicle use will be in accordance with the established guidelines for emergency and non-emergency response.

- **Backing CONFIRE EMS & Mobile Health Vehicles:**

CONFIRE EMS & Mobile Health recognizes that backing ambulances is hazardous because the vehicle operator cannot see much of where he/she intends to go. CONFIRE EMS & Mobile Health mandates that employees avoid backing any CONFIRE EMS & Mobile Health vehicles whenever possible. When it is necessary to back any of these vehicles, all operators shall follow one of the two measures:

CONFIRE EMS & Mobile Health **Mandates** that before the vehicle is put into reverse to back the vehicle, a spotter must be in place near the rear. The spotter should be safely



positioned so that the vehicle operator can see them at all times. If the vehicle operator loses sight of the spotter at any time, he/she will immediately stop the vehicle until the spotter makes himself/herself visible again.

If conditions exist that make use of spotters impossible, all operators, before attempting to back any departmental vehicle, shall/will make a circle of safety to see that no person(s) or obstruction are directly behind the vehicle or in its intended path of travel; all equipment is secured and that all compartment doors are securely closed; any physical obstructions are moved out of the way.

It is the policy of CONFIRE EMS & Mobile Health that the only exception to not using a spotter is in cases of an extreme emergency, and no assistance can be elicited from bystanders or employees.

- ***Passengers In Company Vehicles:***

Passengers will normally be permitted in the driver's compartment. Only one responsible family member or friend may be transported in the passenger seat of the cab. A passenger will not normally be transported in the patient compartment.

Observers designated by the Supervisor or Administrator may ride as passengers in ambulances provided they have met the requirements set forth by CONFIRE EMS & Mobile Health.

- ***Employee Financial Responsibility:***

CONFIRE EMS & Mobile Health employees will be held financially responsible for any damages related to not following the CONFIRE EMS & Mobile Health Vehicle Operations/Driving Policy or any vehicle damage as a result of employee negligence or fault.

- ***Orientation***

All new employees who may be required to operate a company vehicle must complete CONFIRE EMS & Mobile Health Vehicle Driving Program - CEVO during their orientation and/or scheduled drivers training program. The driving program utilized by CONFIRE EMS & Mobile Health shall encompass didactic/online and skill requirements. The initial program will be no less than four (4) hours. All field employees are required to complete an annual refresher program of no less than One (1) hour. The vehicle annual refresher training is conducted using the online portal/intranet.

- ***Remedial Training***

Employees may be required to complete remedial Vehicle Operations Training at the discretion of management. Personnel that fail to complete remedial Vehicle Operators Training when required by management may lose their driving privileges for one year. If an employee loses their driving privileges and the employee's position depends on his/her driving status, the employee may be terminated.



2. EMERGENCY VEHICLE OPERATIONS

- ***Emergency Mode vs Non-Emergency Mode:***

All emergency calls are processed and maybe dispatched as a Priority 1 (emergency - lights and sirens) or Priority 2 (emergency - **NO** lights or sirens). All Priority 1 responses or calls are required to be Code 3 and utilization of lights and sirens. All Priority 2 responses or calls are to be followed as normal response mode (without any lights and sirens) and to always follow speed limits and posted signs and laws. For further information, please refer to Policy 805 (Emergency Call Processing).

Interfacility responses may be deemed emergent or non-emergent. The highest level of certification on the ambulance will determine the mode of response, or requested by the sending physician. An example of an emergency response to an interfacility transport may include but is not limited to ventilator dependent, multiple medication drips, or any patient that has the ability to decompensate quickly and potentially drastically in nature, leading to further injury/illness or death. All other interfacility responses should be handled and transported in non-emergency mode to the destination.

- ***Emergency Mode Passing Restriction:***

Employees are prohibited from passing any other "Emergency Mode Code 3 Vehicle" while running in Emergency Mode. All passing must be conducted only where the road markings permit, and the passing maneuver must be conducted within the posted speed limit.

- ***Emergency Mode, Following Distance Restrictions With Regards For Other Emergency Mode Vehicles:***

Employees should never follow closer than 300' behind emergency vehicles proceeding in Emergency Mode/ Code 3.

- ***Passing School Busses Restrictions and Procedures:***

Employees are prohibited from passing a school bus that is stopped with red lights on and stop sign deployed. Come to a complete stop, 100 ft behind the bus, and wait until the sign is withdrawn and the lights are off. When these conditions are met, pass the bus at idle speed (under 5 mph), looking left and right while passing, being prepared to come to a complete stop if required. This rule also applies to buses discharging handicapped persons and the elderly.

- ***RR Crossing Procedures and Restrictions:***

Under no circumstance or conditions, either emergency mode or nonemergency mode, will any vehicle belonging to CONFIRE EMS & Mobile Health proceed across a Railroad Crossing that is actively displaying a warning of an approaching train or a crossing in which



the warning arm is coming down or is down or a Railroad Crossing that has any indication of an approaching train. The Vehicle or Ambulance will come to a complete and absolute stop well prior to the tracks and wait until the train has passed, the crossing lights are off, and the guard arm is raised. All other times, in addition to stopping and visualizing, it is recommended:

- ***Teamwork / Cockpit Management:***

Exercise good crew teamwork (crew concept/ cockpit management) when going to a call. The driver is responsible for driving only. The attendant is responsible for navigation and threat analysis specifically identifying potential threats to the driver. The attendant may also assist in siren and light operations at the discretion of the vehicle operator. The attendant should always assume a heads-up position, especially on approaches to intersections and a half block from the scene. The attendant should always verbally update operators at intersections and high threat locations. Navigating to the scene and finding addresses should be the responsibility of the attendant.

- ***Warning Devices and Emergency Response:***

When responding priority 1 or emergency mode, all audible and visual warning devices will be operated at all times regardless of time of day and/or traffic conditions. All emergency vehicle operators must understand that warning devices are not always effective in making other vehicle operators aware of your presence. Warning devices only request the right of way, they do not ensure the right of way.

- ***Intersection Practices:***

Extreme care should be taken when approaching any intersection, as intersections are the locations responsible for a large percentage of major accidents involving emergency vehicles. Drivers are required to practice the organizations operating guidelines during all emergency responses.

Uncontrolled Intersections

Any intersection that does not offer a control device (stop sign, yield or traffic signal) in the direction of travel of the emergency vehicle or where a traffic control signal is green upon the approach of the emergency vehicle, all emergency vehicle operators should do the following:

- Scan the intersection for possible hazards (right turns on red, pedestrians, vehicles traveling fast, etc.). Observe traffic in all 4 directions (left, right, front, rear).
- Slow down to a Safe Speed and cover the brake pedal with anticipation of stopping.
- Change the siren cadence not less than 200' from intersection.
- Utilize the Vehicle's Horn in Addition to the Siren, Prior to and Upon Entering the Intersection.
- Avoid using the opposing lane of traffic, if at all possible.

Emergency vehicle operators should always be prepared to stop. If another vehicle operator fails to yield the right of way to an emergency vehicle, the emergency vehicle



operator cannot force the right of way, nor can you assume the right of way, therefore you do not have the right of way until the other vehicle yields to you.

Controlled Intersections:

Any intersection controlled by a stop sign, yield sign, yellow traffic light, or red traffic light requires a complete stop by the emergency vehicle operator. In addition to bringing the vehicle to a complete stop, these additional steps must be followed as well:

- Do not rely on warning devices to clear traffic.
 - Scan the intersection for possible hazards (right turn on red, pedestrians, vehicles traveling fast, ect.) as well as driver options.
 - Begin to slow down well before reaching the intersection and cover the brake pedal. Continue to scan in 4 directions (left, right, front, rear).
 - Change the siren cadence not less than 200' from the intersection.
 - Utilize the Vehicle's Horn In Addition to the Siren, Prior to and Upon Entering the Intersection.
 - Scan the intersection for possible passing options (pass on right, left, wait, ect.) avoid using the opposing lane of traffic.
 - Bring the Vehicle to a **COMPLETE STOP!**
 - Establish eye contact with other vehicles operators; have partner communicate all is clear, reconfirm all vehicles are stopped.
 - Proceed one lane of traffic at a time treating each lane of traffic as a separate intersection.
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- **Response In Private Owned Vehicles:**

When any employee of CONFIRE EMS & Mobile Health responds to the station or to the scene of an emergency in his/her private vehicle, each employee must strictly adhere to all applicable motor vehicle laws. Privately owned vehicles are not provided with the same exemptions that are provided to emergency vehicles. CONFIRE EMS & Mobile Health will not accept any liability for damages to privately owned vehicles responding to scenes.

3. CONFIRE EMS & MOBILE HEALTH VEHICLE ACCIDENTS

- **Accidents:**

All accidents, which involve CONFIRE EMS & Mobile Health personnel or company vehicles, must be reported to the Communications Center, the On-Duty Supervisor and Senior Management, no matter how minor the accident. The supervisor or a member of management must complete an accident report and initial investigation. Accident reports and investigation findings must be forward to the appropriate supervisor. Failure to report an accident or comply with this policy will result in corrective action.

Collision Procedures:

If a collision occurs, the crew will immediately stop, report the event, administer assistance as required, secure the area, and provide appropriate information to personnel on scene. The crew will conduct the appropriate steps as it pertains to crew responsibilities. Failure



to stop and report an accident event will subject the employee to the possibility of termination and / or criminal prosecution. At no time will crew admit fault or blame on scene. At no time will the crew engage in verbal or physical conflict with parties on scene.

If involved in an accident:

- a) Safely Stop the Vehicle.
- b) Report to Communications the following:
 - Unit # or Medic#
 - Event (Code 100 or Code 200)
 - Location
 - Injuries if immediately known
- c) Assess the crew and patient for injuries.
- d) Assess if a Hazmat is involved. If so, report immediately and evacuate upwind and uphill if possible.
- e) If another vehicle is involved, safely exit the vehicle, contact the occupants of the 2nd vehicle and assess their status. Initiate patient care as required. Request additional Medical Units as Required. If occupants refuse to go to the hospital, get refusals.
- f) Secure the area.
- g) Check for Vehicle Damage.
- h) Position visual warning devices appropriately. Do not use flares.
- i) Avoid moving vehicle unless it is required for safety purposes or requested by the on scene police officer.
- j) Gather information and provide appropriate information at the scene. CONFIRE EMS & Mobile Health Operator must provide name, SSN, address, Vehicle registration and insurance information to the vehicle operator or owner of other involved vehicles or property. An accident form is available on the vehicle to guide in obtaining secondary driver information.
- k) Never leave the scene. Stay at the scene, until released by Law Enforcement.
- l) During any interaction with other persons at the scene, do not admit fault. There is no way fault can be determined until a proper investigation is completed.

• ***Vehicle Accident Reporting***

An accident/occurrence is any event that results in injury and/or property damage attributable directly or indirectly to any CONFIRE EMS & Mobile Health vehicle.



Employees who are involved in a vehicle accident while on duty regardless of location or extent of property damage and/or injury, shall notify the following (in order):

1. Communications Center
2. On-Duty Operations Supervisor

The Communications Center will ensure that the On-Duty Operations Supervisor has been notified. The Communications Center shall dispatch additional ambulances or transport units, to handle any injuries or continue a patient transport, if needed and then notify the appropriate Law Enforcement Agency.

The supervisor will also ensure that senior management has been notified and then proceed to the scene of the accident.

Failure to report any accident, in accordance with the aforementioned policy, shall be considered as a policy violation and result in corrective action, which may include termination.

- ***Investigating***

The Supervisor, Manager, or designee involved shall insure that all required reports, photographs and other information are complete and accurate and submitted to the appropriate senior management within 24 hours of the incident.

- **Accident Classification**

Each accident/occurrence involving any CONFIRE EMS & Mobile Health vehicle shall be reviewed and classified as prescribed below:

1. Each accident/occurrence shall be reviewed by CONFIRE EMS & Mobile Health Management to determine classification. Reports will also be reviewed monthly at CONFIRE EMS & Mobile Health Management Meetings.
2. After careful study and review, CONFIRE EMS & Mobile Health Management shall assign a classification to each accident and/or occurrence and reduce their findings to writing.

CONFIRE EMS & Mobile Health Management will determine accident classification in accordance with the following:

- a. Non-Preventable - An accident in which the driver exercised every reasonable precaution to prevent the accident. No action.
- b. Preventable - An accident in which the driver failed to exercise every reasonable precaution to prevent the accident.



1. Minor Preventable - An accident in which no personal injury occurred, nor was caused by the accident, and in which the total resulting damage is \$2500 or less.
2. Major Preventable - An accident in which personal injury occurs and the employees or citizens receive medical treatment, or the total damage exceeds \$2500.



Section 1000 - Compliance

1000.01 Breaches of Unsecured PHI Policy

Policy Number:	1000.01	Issue Date:	
Title:	Breaches of Unsecured PHI Policy	Review Date:	
Section:	Compliance	Revision Date:	
Department Approvals:		Approved By:	
CAAS Number (s):			

Purpose

Under the Health Information Technology for Economic and Clinical Health Act (the "HITECH Act"), CONFIRE EMS & Mobile Health has an obligation, following the discovery of a breach of unsecured protected health information ("PHI"), to notify each individual whose unsecured PHI has been, or is reasonably believed to have been, accessed, acquired, used, or disclosed.

CONFIRE EMS & Mobile Health also has an obligation to notify the Department of Health and Human Services ("HHS") of all breaches. In some cases, CONFIRE EMS & Mobile Health must notify media outlets about breaches of unsecured PHI. This policy details how CONFIRE EMS & Mobile Health will handle and respond to suspected and actual breaches of unsecured PHI.

Scope

This policy applies to all CONFIRE EMS & Mobile Health employees.

Procedure

Breach Defined

1. A breach is the acquisition, access, use, or disclosure of unsecured PHI in a manner not permitted under the HIPAA Privacy Rule, which compromises the security or privacy of the PHI.
 - a. An acquisition, access, use, or disclosure of PHI created, received, maintained, or transmitted by CONFIRE EMS & Mobile Health that is not permitted by HIPAA is presumed to be a breach unless CONFIRE EMS & Mobile Health demonstrates that there is a low probability that the PHI has been compromised based on a "risk assessment" of at least the following factors:
 - i. The nature and extent of the PHI involved, including the types of identifiers and the likelihood of re-identification;
 - ii. The unauthorized person who used the PHI or to whom the disclosure was made;
 - iii. Whether the PHI was actually acquired or viewed; and
 - iv. The extent to which the risk to the PHI has been mitigated.
 - b. "Unsecured protected health Information" is PHI that has not been rendered unusable, unreadable, or indecipherable to unauthorized individuals through the use of a technology or methodology specified by HHS for securing PHI - available on HHS's website at: <http://www.hhs.gov/ocr/privacy>. Generally, PHI is



“unsecured” if it is not encrypted by strong encryption technology or if it has not been properly destroyed. If the PHI is able to be used, read, or deciphered it is “unsecured.”

2. A breach does not include any of the following:
 - a. Unintentional acquisition, access, or use of unsecured PHI by a staff member at CONFIRE EMS & Mobile Health or someone acting under the authority of CONFIRE EMS & Mobile Health if the acquisition, access, or use was made in good faith and within that individual’s scope of authority, so long as the information was not further used or disclosed in violation of HIPAA.
 - b. Any inadvertent disclosure of PHI by a CONFIRE EMS & Mobile Health staff member who is generally authorized to access PHI to another person at CONFIRE EMS & Mobile Health who is generally authorized to access PHI, so long as the information received as a result of such disclosure was not further used or disclosed in violation of HIPAA.
 - c. A disclosure of PHI where CONFIRE EMS & Mobile Health has a good faith belief that an unauthorized person to whom the disclosure was made would not reasonably have been able to retain the information.

Reporting a Suspected Breach Incident

1. All CONFIRE EMS & Mobile Health staff members are responsible for immediately reporting a suspected breach incident to a supervisor or the HIPAA Privacy Officer. CONFIRE EMS & Mobile Health staff members shall report all known or suspected HIPAA violations.
2. The HIPAA Privacy Officer will notify management about the suspected incident.
3. The HIPAA Privacy Officer shall document the date that the suspected breach of unsecured PHI occurred (if known) and the date(s) on which the supervisor and the HIPAA Privacy Officer were notified about the incident.

Investigating a Suspected Breach Incident

1. The HIPAA Privacy Officer shall initiate an investigation to determine whether an actual breach has occurred and what actions, if any, are necessary.
2. The HIPAA Privacy Officer shall interview all necessary parties with information about the incident. The staff member who reported the suspected incident and other members with knowledge of the incident should be asked to complete CONFIRE EMS & Mobile Health’s “Internal Breach Incident Reporting Form.” Staff members are required to convey all information that they know about the incident and to cooperate in any subsequent investigation regarding the incident.
3. After gathering all available information about the incident, the HIPAA Privacy Officer shall conduct an analysis to determine whether an actual breach of unsecured PHI occurred. CONFIRE EMS & Mobile Health shall consult with legal counsel whenever necessary to make this determination. The HIPAA Privacy Officer shall utilize CONFIRE EMS & Mobile Health’s “HIPAA Privacy Officer Action Plan: Breach Analysis Steps” to make this determination.



4. If the Compliance Officer determines that a breach of unsecured PHI has not occurred, the reasons behind that conclusion shall be thoroughly documented.
5. If the HIPAA Privacy Officer determines that a breach of unsecured PHI has occurred, the reasons behind that conclusion shall be thoroughly documented and the HIPAA Privacy Officer shall proceed to notify all necessary parties in accordance with this policy.

Breach Notification to Affected Individuals

1. Following the discovery of a breach of unsecured PHI, CONFIRE EMS & Mobile Health will notify each individual whose unsecured PHI has been, or is reasonably believed to have been, accessed, acquired, used, or disclosed as a result of such breach. The HIPAA Privacy Officer shall be the party who is primarily responsible for making proper notice in consultation with CONFIRE EMS & Mobile Health management and legal counsel.
2. A breach shall be treated as discovered by CONFIRE EMS & Mobile Health as of the first day on which the breach is known, or, by exercising reasonable diligence would have been known to CONFIRE EMS & Mobile Health or any person, other than the person committing the breach, who is a staff member or agent of CONFIRE EMS & Mobile Health.
3. CONFIRE EMS & Mobile Health shall provide the notification without unreasonable delay and in no case later than 60 calendar days after discovery of a breach.
4. If a law enforcement official states to CONFIRE EMS & Mobile Health that a notification, notice, or posting would impede a criminal investigation or cause damage to national security, CONFIRE EMS & Mobile Health shall:
 - a. Delay notification for the time period specified by the official if the statement is in writing and specifies the time for which a delay is required; or
 - b. If the notice is a verbal statement, delay notification temporarily and no longer than 30 days from the date of the oral statement unless a written statement is submitted during that time. If the statement is made orally, the HIPAA Privacy Officer shall document the statement, including the identity of the official making the statement.
5. CONFIRE EMS & Mobile Health shall provide written notification, in plain language, by first-class mail to each affected individual at the last known address of each individual. If the affected individual agreed to receive electronic notice of breaches, CONFIRE EMS & Mobile Health may provide notice by electronic mail. Notification may be provided in one or more mailings as information becomes available.
6. The HIPAA Privacy Officer shall utilize CONFIRE EMS & Mobile Health's "Individual Notice of Breach of Unsecured PHI" when sending notice to affected parties. The Notice shall include, to the extent possible:
 - a. A brief description of what happened, including the date of the breach and the date of the discovery of the breach, if known;
 - b. A description of the types of unsecured PHI that were involved in the breach (such as whether full name, social security number, date of birth, home



- address, account number, diagnosis, or other types of information were involved);
- c. Any steps individuals should take to protect themselves from potential harm resulting from the breach;
 - d. A brief description of what CONFIRE EMS & Mobile Health is doing to investigate the breach, mitigate harm to individuals, and protect against any further breaches; and
 - e. Contact procedures for individuals to ask questions or learn additional information about the incident from CONFIRE EMS & Mobile Health. These contract procedures shall include a toll-free telephone number and an e-mail address to reach CONFIRE EMS & Mobile Health's HIPAA Privacy Officer.
7. If the HIPAA Privacy Officer determines that affected individuals need to be contacted immediately to protect them from potential harm, the HIPAA Privacy Officer shall contact those individuals by telephone or other means as soon as possible. CONFIRE EMS & Mobile Health shall still send written notice to these individuals about the incident.
 8. If CONFIRE EMS & Mobile Health knows that any affected individual is deceased and CONFIRE EMS & Mobile Health has the address of the next of kin or personal representative of the individual, CONFIRE EMS & Mobile Health shall provide written notification by first-class mail to either the next of kin or personal representative.
 9. If CONFIRE EMS & Mobile Health has insufficient or out-of-date contact information for any affected individuals, CONFIRE EMS & Mobile Health shall use a substitute form of notice that, in the informed opinion of the HIPAA Privacy Officer, will reach the individual. Substitute notice is not required in cases where there is insufficient or out-of-date contact information for the next of kin or personal representative of a deceased individual. Substitute notice will be provided in the following manner:
 - a. If there is insufficient or out-of-date contact information for fewer than 10 affected individuals, then substitute notice may be provided by an alternative form of written notice such as placing a notice in the newspaper, calling the patient, or other means.
 - b. If there is insufficient or out-of-date contact information for 10 or more individuals, then the substitute notice shall: (i) be conspicuously posted on CONFIRE EMS & Mobile Health's home page of its website for 90 days, or conspicuous notice in major print or broadcast media in geographic areas where each affected individual likely resides; and (ii) include a toll-free phone number for CONFIRE EMS & Mobile Health that remains active for at least 90 days where individuals can learn whether their unsecured PHI may be included in the breach.

Breach Notification to the Media

1. For a breach of unsecured PHI involving more than 500 residents of a single state or jurisdiction, CONFIRE EMS & Mobile Health shall notify prominent media outlets serving the state or jurisdiction about the breach. The HIPAA Privacy Officer shall be the party in charge of making such notice and shall make such notification in consultation with CONFIRE EMS & Mobile Health management and legal counsel.



2. Notification to the media shall be made without unreasonable delay and in no case later than 60 calendar days after discovery of the breach.
3. Notification to the media shall include all information that must be included in individual notice.

Breach Notification to HHS

1. CONFIRE EMS & Mobile Health shall notify HHS of all breaches of unsecured PHI in accordance with this policy.
 - a. For breaches of unsecured PHI involving 500 or more individuals, CONFIRE EMS & Mobile Health shall provide notice to HHS when it provides notice to affected individuals. Notice must be provided in the manner specified on the HHS Website at:
<http://www.hhs.gov/ocr/privacy/hipaa/administrative/breachnotificationrule/>. The HIPAA Privacy Officer shall be responsible for ensuring that such notice is submitted to HHS and must consult management before submitting the information to HHS.
 - b. For breaches of unsecured PHI involving less than 500 individuals, CONFIRE EMS & Mobile Health shall maintain a log of such breaches and report them to HHS on an annual basis. The HIPAA Privacy Officer shall track these breaches on CONFIRE EMS & Mobile Health's "Log for Tracking Breach Incidents." The HIPAA Privacy Officer shall report these breaches to HHS annually, no later than 60 days after the end of the calendar year in which these breaches were discovered. This shall be done in the manner specified on the HHS Website at:
<http://www.hhs.gov/ocr/privacy/hipaa/administrative/breachnotificationrule/>. The HIPAA Privacy Officer shall ensure that the information is submitted to HHS by March 1 of each year and must consult with management before submitting the information to HHS.

Breach Notification in Accordance with State Law

1. The HIPAA Privacy Officer shall also determine, in consultation with legal counsel, whether CONFIRE EMS & Mobile Health has any additional breach notification obligations under applicable state laws.
2. CONFIRE EMS & Mobile Health must look to each state in which an affected individual resides when making this determination and shall consult legal counsel licensed to practice in those states.

Administrative Requirements

1. The HIPAA Privacy Officer shall record and maintain thorough records of all activities related to suspected and actual breach incidents.
2. In the event of a suspected crime, or other unlawful activity, local, state, or federal law enforcement may need to be notified. That determination will be made by management with a recommendation from the HIPAA Privacy Officer. The HIPAA



Privacy Officer shall coordinate communications with outside organizations and law enforcement.

3. CONFIRE EMS & Mobile Health will train all members of its staff so that they are able to identify suspected breaches of unsecured PHI and know how to report all suspected breaches to the appropriate party immediately.
4. Staff members who violate this policy will be subject to disciplinary action, up to and including termination.



1000.10 Designated Record Sets Policy

Policy Number:	1000.10	Issue Date:	
Title:	Designated Record Sets Policy	Review Date:	
Section:	Compliance	Revision Date:	
Department Approvals:		Approved By:	
CAAS Number (s):			

Purpose

To ensure that CONFIRE EMS & Mobile Health patients and their authorized representatives are granted rights regarding Protected Health Information (“PHI”) in accordance with the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), this policy establishes what protected health information (“PHI”) at CONFIRE EMS & Mobile Health should be accessible to patients as part of a Designated Record Set (“DRS”). Under HIPAA, a DRS includes medical records that are created or used by CONFIRE EMS & Mobile Health to make decisions about the patient

Scope

This policy applies to all CONFIRE EMS & Mobile Health employees.

Procedure

The DRS should only include PHI as defined under HIPAA, and should be comprised of individually identifiable healthcare and billing information created, received, maintained or transmitted by or on behalf of CONFIRE EMS & Mobile Health that is used, in whole or in part, by CONFIRE EMS & Mobile Health to make decisions about individuals. The HIPAA Privacy Officer shall be the party in charge of designating what information is part of a DRS at CONFIRE EMS & Mobile Health and for ensuring that appropriate information is being maintained by CONFIRE EMS & Mobile Health in its designated record sets.

The Designated Record Set at CONFIRE EMS & Mobile Health

1. The DRS at CONFIRE EMS & Mobile Health for any requests regarding PHI includes the following records:
 - i. Paper or electronic patient care reports (“PCR” or “ePCR”) created or received by CONFIRE EMS & Mobile Health and supplementary information regarding the patient’s condition. This includes any photos, videos, monitor strips, Physician Certification Statements, Refusal of Care forms, Advance Beneficiary Notice of Noncoverage forms, or information from other source used by CONFIRE EMS & Mobile Health to treat patients or bill for services.
 - ii. The electronic claims records or other paper records of submission of actual claims to Medicare or other insurance companies.
 - iii. Any patient-specific claim and billing information, including responses from insurance payers, such as remittance advice statements, Explanation of



- Medicare Benefits (EOMBs), charge screens, patient account statements, and signature authorization and agreement to pay documents.
- iv. Notices from insurance companies indicating coverage determinations, documentation submitted by the patient, and copies of the patient's insurance card or policy coverage summary, that relate directly to the care of the patient or payment for that care.
 - v. Amendments to PHI, or statements of disagreement by the patient requesting the amendment when PHI is not amended upon request, or an accurate summary of the statement of disagreement.
2. The DRS should also include treatment related records created by other parties such as first responder units, assisting ambulance services, air medical services, nursing homes, hospitals, police departments, coroner's offices, etc., that are used by CONFIRE EMS & Mobile Health for treatment and payment related purposes.
3. A designated record set should not include:
- i. Quality assurance data collected and maintained for peer review purposes;
 - ii. Accident reports;
 - iii. Incident reports;
 - iv. Duplicate information maintained in other systems;
 - v. Data collected and maintained for research;
 - vi. Information compiled in reasonable anticipation of litigation or administrative action;
 - vii. Employment records; or
 - viii. Student records.



1000.11 Minimum Necessary Requirement & Role-Based Access to PHI Policy

Policy Number:	1000.11	Issue Date:	
Title:	Minimum Necessary Requirement & Role-Based Access to PHI Policy	Review Date:	
Section:	Compliance	Revision Date:	
Department Approvals:		Approved By:	
CAAS Number (s):			

Purpose

Generally, the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) requires that CONFIRE EMS & Mobile Health only use or disclose the minimum amount of protected health information (“PHI”) that is needed to accomplish the intended purpose for which the use or disclosure is made. This policy outlines CONFIRE EMS & Mobile Health’s commitment to adhere to HIPAA’s “minimum necessary requirement.” In order to effectively meet our obligations, this policy outlines the appropriate levels of access to PHI that specific staff members of CONFIRE EMS & Mobile Health should have – “Role Based Access.” This policy does not in any way limit the amount of PHI that may be exchanged between CONFIRE EMS & Mobile Health staff members or between CONFIRE EMS & Mobile Health staff members and other individuals during the course of treating patients.

Scope

CONFIRE EMS & Mobile Health, including all business associates, herein referred to as CONFIRE EMS & Mobile Health. This policy applies to all CONFIRE EMS & Mobile Health staff members who have any degree of access to PHI at CONFIRE EMS & Mobile Health.

Procedure

CONFIRE EMS & Mobile Health retains strict requirements on the security, access, disclosure, and use of PHI. Access, disclosure, and use of PHI will be based on the role of the individual staff member in the organization and only to the extent that the person needs to access and use the PHI to complete necessary responsibilities for CONFIRE EMS & Mobile Health. When PHI is accessed, disclosed, and used, the individuals involved will make every effort, except in patient care situations, to only access, use, and disclose the minimum amount of information needed to accomplish the intended purpose.

Role Based Access

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



Job Title	Description of PHI to Be Accessed	Conditions of Access to PHI
EMT	Intake information from dispatch, patient care reports, QA and QI reports	May access only as part of the completion of a patient event and post-event activities and only while actually on duty
Paramedic	Intake information from dispatch, patient care reports, QA and QI reports	May access only as part of the completion of a patient event and post-event activities and only while actually on duty
Billing Clerk	Intake information from dispatch, patient care reports, billing claim information, remittance advice, and other patient information from facilities necessary for billing	May access only as part of duties to complete patient billing and follow-up and only while actually on duty
Field Supervisor	Intake information from dispatch, patient care reports, QA and QI reports	May access only as part of the completion of a patient event and post-event activities, as well as for quality assurance checks and corrective counseling of staff
Dispatcher	Intake information, preplanned CAD information on patient address	May access only as part of the completion of an incident, from receipt of information necessary to dispatch a call to the closing out of the incident and only while on duty
Training Coordinator	Intake information from dispatch, patient care reports, QA and QI reports	May access only as a part of training and quality assurance activities. All individually identifiable patient information should be redacted prior to use in training and quality assurance activities
Managers	Intake information from dispatch, patient care reports, QA and QI reports, billing claim forms, remittance advice, other patient information necessary for oversight	May access only to the extent necessary to monitor compliance, accomplish appropriate supervision and management of personnel, and compliance with the law

Access to a patient's entire file will not be allowed except when necessary for a legitimate treatment, payment, or healthcare operations-related reason.



Disclosures to and Authorizations from the Patient

CONFIRE EMS & Mobile Health may freely disclose PHI to patients who are the subject of the information and we may freely use and disclose PHI to the extent authorized by a patient. CONFIRE EMS & Mobile Health is required to limit disclosure to the minimum amount of information necessary when releasing it pursuant to a patient request or formal Authorization.

CONFIRE EMS & Mobile Health Requests for PHI from Other Parties

If CONFIRE EMS & Mobile Health needs to request PHI from another party on a routine or recurring basis, we must limit our requests to only the minimum amount of information needed for the intended purpose, as described in the table below. For requests not addressed in the table below, CONFIRE EMS & Mobile Health must make this determination individually for each request, and this determination should be made by the HIPAA Privacy Officer. For example, if the request is non-recurring or non-routine, like making a request for documents pursuant to an audit request, we must make sure our request covers only the minimum necessary amount of information needed to accomplish the purpose of the request.

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

PHI Requests to CONFIRE EMS & Mobile Health from Other Parties

CONFIRE EMS & Mobile Health will make reasonable efforts to release only the minimum and lawful amount of PHI that is necessary to accomplish the actual purpose of a request from a third party.

Incidental Disclosures



CONFIRE EMS & Mobile Health understands that there will be times when there are incidental disclosures about PHI in the context of caring for a patient. HIPAA was not intended to impede common healthcare practices that are essential in providing healthcare to the individual.

Incidental disclosures typically occur in radio or face-to-face conversations between healthcare providers, or when PHI is able to be viewed by others, despite reasonable efforts to protect the PHI from view. All personnel must be sensitive to avoiding incidental disclosures to other healthcare providers and others who do not need to know the information. CONFIRE EMS & Mobile Health staff should be attentive to who is within earshot when making verbal statements about a patient's health information and follow some of these common-sense measures for avoiding accidental or inadvertent disclosures:

Measures to Protect PHI

1. **Verbal PHI.** Staff members should only discuss PHI with those involved in the patient's care, regardless of physical location. When discussing PHI with patients, staff members should make sure that there are no other persons (including other CONFIRE EMS & Mobile Health staff members) in the area who could overhear the discussion. If so, the patient should be brought into a screened area before engaging in discussion.
2. **Hard Copy PHI.** All paper patient care reports should be stored in safe and secure areas when not in use. No paper records concerning a patient should be left in open bins or on desktops or other surfaces. Only those with a need to have the information for the completion of their job duties should have access to any paper records. Additionally, billing records, including all notes, remittance advices, charge slips or claim forms should not be left out in the open and should be stored in files or boxes that are secure and in an area with access limited to those who need access to the information for the completion of their job duties.
3. **E-PHI.** Computer access terminals and other mobile devices should be kept secure. Staff members should be sensitive to who may be in viewing range of the monitor screen and take simple steps to shield viewing of the screen by unauthorized persons. All mobile devices such as laptops, ePCRs and cell phones should remain in the physical possession of the individual to whom they are assigned at all times.