**POLICIES**

**Alcohol, Marijuana and Drug Use**

The consumption of alcohol or marijuana during normal working hours and/or the use or distribution of illegal drugs is prohibited. Further, working while under the influence of drugs, marijuana or alcohol is strictly forbidden. Either may result in disciplinary action, including termination of employment. Random drug testing and/or drug testing upon hire may be conducted at the sole discretion of Clinic A, as allowed by law.

# Anti-Kickback

Anti-Kickback is a criminal law that prohibits the knowing and willful payment of “remuneration” to induce or reward patient referrals or the generation of business involving any item or service payable by the Federal health care programs (e.g., drugs, supplies, or health care services for Medicare or Medicaid patients). Remuneration includes anything of value and can take many forms besides cash, such as free rent, expensive hotel stays and meals, and excessive compensation for consultancies. The statute covers the payers of kickbacks—those who offer or pay remuneration— as well as the recipients of kickbacks—those who solicit or receive remuneration.

Clinic A must not provide any patient with any item of greater than $15 in value or $75 aggregate per calendar year.

Clinic A must not provide any referral source with any remuneration, directly or indirectly, overtly or covertly, in cash or in kind. Clinic A must also not provide any referral source with a referral pad which contains Clinic A’s contact information or logo.

Clinic A and its providers must not receive any remuneration, directly or indirectly, overtly or covertly, in cash or in kind from any vendor whose equipment is covered by a federal health care program.

Clinic A is does not support or condone violating any state or federal anti-kickback statute. Any anti-kickback violation can result in immediate termination.

Attendance

In order to give the best possible service to patients, it is necessary for all staff members to come to work regularly and to be on time. Clinic A recognizes that circumstances beyond an employee’s control may cause them to be absent or late to work for all or part of a day. Any time an employee must be absent or late to work it is expected that the office be notified immediately. If no one is at the office, call or text the office manager or supervisor at his/her home number or on his/her cell phone no later than 7:00 a.m. on the day the staff member is going to be absent or tardy.

# Audiologist and Staff Member Discounts

Audiologists, staff and their family members are entitled to obtain hearing care services and hearing aids at a reduced fee. Commission/bonus does not apply to these discounted services. Family members include spouses, children, parents, grandparents, siblings, and mother and fathers in laws. It is the sole discretion of the staff member as to whether they want the family member to receive these discounts.

Some private insurance plans prohibit or restrict Clinic A from billing items and services audiologists may provide to immediate family members. Please consult the family member’s insurance plan for specific information about Clinic A’s ability to access any third-party benefits.

The discounted charges will be as follows:

* Diagnostic testing must be billed to the family member’s insurance and all co-pays, co-insurance and deductibles must be applied due to contractual obligations.
* Hearing aids, earmolds, swim plugs, and repairs will be sold at cost plus any shipping and handling charges or billed to family member’s insurance and all co-pays, co-insurance and deductibles must be applied due to contractual obligations.
* Accessories such as assistive listening devices, hearing aid batteries and accessories, etc. will be sold at cost, plus all shipping and handling charges.

All payment is due in full on the date of purchase. No exceptions can be made to this policy.

Billing

*Verification*

Coverage and benefits must be verified, prior to the appointment, for the following services:

* Hearing aids and hearing aid related services.
* Tinnitus management.
* Auditory processing evaluation and management.
* Auditory prosthetic devices and related items and services.
* Vestibular evaluation and management.

Staff must inform the rendering audiologist and patient of their coverage and benefits and any resulting out of pocket financial responsibilities.

*Provider responsibilities*

Providers must:

* Follow Clinic A’s financial policies.
* Complete the testing, evaluation or treatment.
* Complete all reports and documentation in the medical record by the close of each business day.
* Fill out the superbill or enter charges into the EHR/EMR/OMS and complete an EHR/EMR/OMS encounter (or superbill) on every patient you see, even no-charge visits.
* Follow the limitations outlined in Clinic A’s insurance verification process, including fitting hearing aids within the verified benefit AND allowable rates.

Failure of a provider in meeting their daily responsibilities can result in corrective action.

*Staff responsibilities*

Front office and billing staff are responsible for:

* Follow Clinic A’s financial policies.
* Collecting patient financial responsibility on the date of service.
* Posting the information from the superbill/EMR/OMS and submits the claim within two business days of the date of service.
* Posting claims payments and explanations of benefits as received each day.
* Monitoring payments, especially accounts receivable outside of 90 days.
* Filing appeals for denials or incorrect payments within two business days of receipt of the denial or underpayment.
* Monitoring accounts payable.

Failure of staff in meeting their daily responsibilities can result in corrective action.

*Management responsibilities*

Clinic management are responsible for:

* Providing training for themselves, their providers and their staffs.
* Create and maintain office policies and procedures.
* Evaluating and updating policies, procedures and pricing on, at least, an annual basis.
* Monitoring revenue cycle (claims payments, accounts payable and accounts receivable) on, at least, a monthly basis.

*Patient and guarantor responsibilities*

Patients and guarantors are responsible for:

* Paying financial responsibilities, including but not limited to, co-payments, co-insurance, unmet deductibles, and costs of non-covered services ate the time of visit, the date the item is dispensed, or the date the item is picked up.
* Treating providers and staff is a respectful manner, regardless of the race, color, sex, age, disability, religion, national origin, marital status, sexual orientation, ancestry, political belief or activity of any Clinic A staff member.

Any patient or guarantor who fails to meet their financial or professional responsibilities may be terminated from the practice with written notification. When a patient is terminated, their medical records will be immediately forwarded to the patient with their termination letter and sent via certified mail or email.

*Collections*

Patients who fail to meet their financial responsibilities after 90 days of their first invoice can be forwarded to a collection agency. Patients who have unmet financial obligations will not be scheduled for future visits without first securing a payment plan with Clinic A.

**Business Gifts**

Staff members cannot accept cash or receive personal profit from their position with this company or from their dealings with vendors, patients, or other business contacts. If this is a question regarding the appropriateness of a gift, please notify the supervisor immediately. Its acceptance will be at the sole discretion of the supervisor.

# Business Hours

Work schedules are established as required by workload, patient service needs, and the efficient management of staff member resources. The normal workweek is Monday through Friday from 8:00 a.m. to 12:00 p.m. and 12:30 p.m. to 5:00 p.m. All staff members are expected to arrive in their office no later than 7:45 a.m. each workday. Staff members may be required to work overtime whenever it is deemed necessary. The fact that a staff member may work nights or weekends does not exclude the staff member from working normal office hours.

Calibration

Clinic A must calibration all audiologic and vestibular test equipment annually or as required by state or federal law or payer requirements.

All calibration certificates and documents must be maintained for six years or as required by state or federal law.

Child Endangerment Reporting

Audiologists are responsible for documenting and reporting suspected or confirmed cases of child endangerment to the appropriate local, state and federal authorities in accordance with state and federal child endangerment laws. Audiologists should document and report suspected or confirmed cases of child endangerment to their immediate supervisor.

Failure to report a suspected or confirmed cases of child endangerment can result in corrective action or termination.

Code of Conduct Disciplinary Guidelines

Guidelines are necessary to create an efficient and professional business environment. The following standards of conduct and those addressed elsewhere in this handbook shall be in effect for all staff members.

Violation of the following rules will be considered grounds for disciplinary action up to and including discharge. Such discipline may include a verbal or written warning, suspension without pay, or immediate discharge. The type of disciplinary action taken will depend on the conduct and circumstances involved and the employee’s previous disciplinary record. Any other form of irresponsible or unacceptable behavior not specifically addressed by one of the following rules may also result in disciplinary action.

*Prohibited actions include, but are not limited to:*

* ABSENTEEISM – Staff members are hired because their services are needed to meet organizational goals. Excessive absenteeism is prohibited. All absences must be reported to Supervisor prior to starting time;
* ATTITUDE – Staff members should be courteous, friendly, helpful, and prompt in dealing with patients and co-workers. Their attitude reflects on the group practice and influences patients’ opinions of the organization;
* BELONGINGS, PERSONAL – Safeguarding, replacing or repairing personal property that has been lost, stolen or damaged is the responsibility of the employee. Staff members are encouraged not to bring valuable possessions to work;
* COMPETITORS – An employee is prohibited from working directly or indirectly for a competitor of Clinic A. This includes self-employment ventures;
* CONFIDENTIAL INFORMATION – The unauthorized disclosure of any business or patient information that could be damaging to the company’s interests is prohibited;
* CONFLICT OF INTEREST – Staff members must refrain from engaging in any activity or practice that conflicts with the interests of the practice or its patients as using the business relationship for personal gain;
* CO-WORKER/EMPLOYEE RELATIONS – Staff members should be non-discriminating, fair, and friendly in dealing with fellow staff members. Cooperation ensures pleasant working conditions. A good attitude toward fellow staff members enhances the efficiency of the practice;
* DAMAGE TO INFORMATION, RECORDS OR PROPERTY – Damage, loss, destruction or any attempt to conceal defective information, records or property is prohibited;
* DECORUM – Professional conduct is expected at all times by all staff members, Conversation should be in low tones and pertain only to business matters;
* DISORDERLY CONDUCT – Disorderly conduct during working hours is prohibited. This includes fighting, scuffling, horseplay, threatening or abusing other staff members;
* DONATION OF LEAVE – Donation of sick or vacation leave time to another employee is strictly prohibited;
* EXPLOSIVES – Possessing explosives and dangerous or hazardous materials in any form during working hours or on practice property at any time is prohibited;
* FALSIFICATION OF TIME CARDS – Falsifying time cards, recording another employee’s time card or having one’s time card recorded by another is prohibited;
* FIREARMS – Possessing firearms or weapons of any nature during working time or on practice property is prohibited;
* FRAUDULENT STATEMENTS – Fraudulent statements that attempt to destroy or injure are prohibited;
* GOSSIP – Avoid all idle or malicious talk;
* HOUSEKEEPING – Each employee should keep his/his work area clean, neat, and orderly. Areas within the public view should be kept free of food;
* INSUBORDINATION – Refusing to comply with supervisory orders concerning job-related matters is prohibited;
* INTENT TO HARM – Destroying property, inflicting bodily injury or attempting destruction or injury is prohibited;
* LEAVING WORK – Preparing to leave work before the end of the workday is prohibited;
* LOSS OF PROPERTY, RECORDS OR INFORMATION – Willful loss of, damage to, unauthorized use of, or destruction of property, records or information is prohibited;
* MAIL, PERSONAL – Due to the large volume of incoming mail, staff members are not to use the practice as a personal mailing address either through the postal service, the fax machine or e-mail. Supervisor Hearing Center, Inc. letterhead, stationery and equipment are used for business only;
* MEDIA CONTACT/RELATIONS – If contacted by the press, staff members should refer these contacts to Supervisor immediately;
* NARCOTICS AND ALCOHOL – Unauthorized use, sale or possession of non-prescription drugs or alcohol on business premises is prohibited;
* OFFENSIVE LANGUAGE – Offensive, abusive, profanity or improper language during working hours is prohibited;
* PATIENT/EMPLOYEE RELATIONS – In relationships with patients and the public, staff members should use good manners, patience, understanding, respect, and dignity;
* PERSONAL PROJECTS – Any personal project that utilizes the practices’ equipment and materials must be approved by Supervisor;
* PROFESSIONAL ORGANIZATIONS – Staff members may participate in professional organizations relating specifically to their jobs or specialties.
* SMOKING – Staff members may not smoke in areas where smoking is prohibited;
* STEALING – Stealing is prohibited;
* THREATS – Threats or intimidation by any employee is prohibited; and
* WORKPLACE HARASSMENT – Workplace harassment including sexual harassment is prohibited. Sexual harassment is any unwanted attention of a sexual nature that occurs in the process of working or seeking work, or jeopardizes a person’s ability to earn a living. Harassment ranges from offensive remarks to annoyances and distractions to deliberate intimidation, threats, and demands of physical acts. Harassment is not tolerated, and disciplinary actions may be taken, including termination.

An employee guilty of any of the above is open to immediate dismissal. The infractions identified above are examples and in no way restrict the management’s right to take disciplinary action or terminate an employee when an unlisted infraction occurs.

# Confidential Relations

## Confidentiality is governed by the Health Insurance Portability and Accountability Act (HIPAA) and our office policies and procedures. Patient and practice information should never be discussed or disclosed outside of the office. All staff members will be asked to sign a confidentiality agreement at the time of hire. This agreement outlines the confidentiality guidelines of Clinic A. The medical records and financial details of individual patients of Clinic A are strictly confidential and shall not be discussed outside of the office. Patient files and all related testing information, purchase history, patient name lists, prospect lists, computer databases and other proprietary information collected from patients is confidential and is the property of Clinic A. It is the responsibility of all staff members to keep this information confidential and to report to the supervisor any violation of this policy immediately. Failure to adhere to Clinic A’s confidentiality policies and procedures will result in immediate termination.

Corrective Action

For the efficient and harmonious operation of all Clinic A offices, supervisors are required to take corrective action when an employee is not performing satisfactorily or is engaging in misconduct, especially as it relates to HIPAA.

The following policy statement outlines the procedures followed in case of misconduct. These procedures will be administered equally to all staff members, without regard to race, creed, religion, political affiliation, color, national origin, disability, age or sex. While Clinic A employs the employee, they may discuss this procedure and review the documentation in their file by making an appointment with supervisor. If the employee disagrees with any of the corrective actions taken, they have a right to state this disagreement through the grievance process.

When disciplinary action is warranted, their supervisor may institute any of the actions listed below, depending upon the severity of the offense:

1. An employee may be given a verbal warning. It is the responsibility of their immediate supervisor to make the individual aware of the reasons for which their actions are not acceptable and to what extent they have violated the policies of Clinic A
2. If an employee commits an offense of a more serious nature, as outlined, or fails to correct their performance following a verbal warning(s), then a written warning should be made. This written warning should be discussed with the employee and the employee should sign the warning indicating that they have read the warning and understand its implications. A copy of the written warning should be placed in the employee’s staff member’s file. After receiving three written warnings, the employee will be immediately terminated.
3. An employee may be terminated. In cases where termination is contemplated, the termination should be discussed between the supervisor and the employee. This will be a review of the documentation or circumstances surrounding the incident or issue. The final determination as to whether termination will be completed is the sole responsibility of the supervisor.

# Customer Relations

A professional atmosphere is extremely important at Clinic A in establishing and maintaining positive patient relations. Each employee is responsible for helping maintain a professional atmosphere in the office, in the community as a representative of the company and on the telephone. This includes personal appearance, personal conduct, and orderliness of personal offices, treatment of patients, and the treatment of co-workers.

In the event an issue arises with a patient or customer, the supervisor should be immediately notified so he/she can mediate the situation accordingly.

Dress Code/Personal Appearance

In a facility such as Clinic A the staff members not only make impressions on others by what they say or do, but also by what they wear. It is expected that staff members maintain the highest standards of personal cleanliness and grooming. Professional staff must wear a name

badge at all times that denotes their name and title. Staff members should present a neat and professional appearance at all times during working hours:

*Female Staff Members:*

There are numerous types and styles of appropriate female attire. Jeans, shorts, tank tops (unless accompanied by a matching blouse or jacket), skirts more than two inches above the knee; halter-tops and bare midriffs are prohibited. Audiologists and hearing instrument specialists are required to wear their lab coats during all patient interactions.

*Male Staff Members:*

A shirt or sweater and slacks are the most appropriate clinical attire. Jeans and T-shirts are prohibited. Audiologists and hearing instrument specialists are required to wear their lab coats during all patient interactions.

**Elder Abuse Reporting**

Audiologists are responsible for documenting and reporting suspected or confirmed cases of elder abuse to the appropriate local, state and federal authorities in accordance with state and federal elder maltreatment laws. Audiologists should document and report suspected or confirmed cases of elder abuse to their immediate supervisor.

Failure to report a suspected or confirmed cases of elder abuse can result in corrective action or termination.

**Electronic Mail and Internet System**

These systems are provided for business purposes only. Personal e-mail, correspondence, and Internet use should be kept at a minimum. Please use best judgment.

The electronic mail system or Internet access may not be used for the following:

* Solicitations for non-work related issues or services.
* Transmission, receipt or viewing of any sexually explicit material or material that is discriminatory in nature.
* Transmission or storing of any threatening, obscene, or harassing messages.
* The origination or forwarding of chain letters or jokes.
* Posting on Facebook, LinkedIn, Twitter, Instagram, etc. during work hours.

Clinic A reserves the right to review, audit, intercept, access and disclose all messages created, received or sent via the e-mail or Internet systems without the staff member’s consent for any purpose. Staff members who violate this policy will be subject to disciplinary action.

Emergency Plan

*Falls*

If a patient or visitor is involved in fall while in the office, provide immediate assistance but do not move the individual. As soon as the individual is comfortable, call 911 when appropriate. Contact the supervisor immediately. An Incident form must be completed and forwarded to the supervisor within 24 hours of the incident.

*Hazardous materials*

Use hazardous and flammable items, such as cleaning fluids, powders, monomers, and other lab chemicals with caution and in solely accordance with package directions. An exhaust fan shall be turned on for 10 minutes on the hour. Any incidents that arise due to the use of a hazardous material must be immediately reported to the supervisor. An Incident form must be completed and forwarded to the supervisor within 24 hours of the incident.

*Illnesses*

If a patient or visitor becomes ill while in the office, provide immediate assistance.. As soon as the individual is comfortable, call 911 when appropriate. Contact the supervisor immediately. An Incident form must be completed and forwarded to the supervisor within 24 hours of the incident.

*Inclement weather*

In the event of a weather emergency, please move patients and staff to safety and avoid windows, elevators, and hazardous areas. Audiometric test booths are an extremely safe option. If possible, contact the supervisor immediately and follow the weather event via radio, television, or phone. An Incident form must be completed and forwarded to the supervisor within 24 hours of the incident.

*Suicide threat*

If a patient or a visitor threatens suicide or personal harm to themselves or someone else, please immediately leave the room and call 911. Contact the supervisor immediately. An Incident form must be completed and forwarded to the supervisor within 24 hours of the incident.

*Weapons*

If a patient or a visitor threatens staff or other patients with a weapon, please immediately seek safety and call 911. If possible move all other staff and patients to safety. Audiometric test booths are an extremely safe option, especially if they can be locked from the inside. If possible, please contact the supervisor immediately. An Incident form must be completed and forwarded to the supervisor within 24 hours of the incident.

Failure to adhere to these rules can be considered grounds for termination**.**

Equal Employment Opportunity

Clinic A will provide employment opportunities without regard to race, color, sex, age, disability, religion, national origin, marital status, sexual orientation, ancestry, political belief or activity, or status as a veteran. Clinic A is an equal opportunity employer where applicants for employment are selected solely based on ability, skill, experience, training, qualifications, and character. Discrimination against any individual for reasons of race, color, creed, religion, sexual orientation, natural origin, sex, age, handicap, or veteran status is specifically prohibited.

Staff members must demonstrate conduct that is consistent with the above policy at all times. Any actions deemed to be discriminatory or inconsistent with the above philosophy will not be tolerated.

Staff members who believe that they may be discriminated against are encouraged to contact their supervisor immediately. An informal determination will be made at this time, and a fair and equitable resolution will be implemented. If an informal resolution is not achieved, staff members will then submit a formal grievance to report the nature of their claim in writing. The supervisor will review this report and a fair and reasonable resolution will be facilitated.

False Claims

Providers should not submit a false claim to any payer, patient or entity.

Examples of false claims, include but are not limited to:

* Submission of a claim for services not performed, including hearing aids that have not yet been dispensed.
* Billing under another provider’s national provider identification number or provider transaction access number.
* Upcoding
* Billing for services known to not be covered and not adding the appropriate modifier.
* Submitting claims for services which were not medically necessary and not adding the appropriate modifier.

Clinic A is does not support or condone violating any state or federal false claims statute. Any violation of the false claims act or any submission of a false claim can result in immediate termination.

Financial Policies

*Notices of Non-coverage*

As required by payer, providers must have the patient review and complete a notice of non-coverage prior to rendering services and dispensing items who are excluded from insurance coverage or which do not meet the definition of a medically necessary insurance benefit.

*Patient Responsibility*

Patients are responsible for paying financial responsibilities, including but not limited to, co-payments, co-insurance, unmet deductibles, and costs of non-covered services ate the time of visit, the date the item is dispensed, or the date the item is picked up.

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*Insufficient Funds*

There will be a $30 fee for all bounced or returned checks.

*Forms of Payment*

Clinic A accepts payment in the form of cash, checks, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. We also offer a third-party credit program through \_\_\_\_\_\_\_\_\_\_\_\_.

It is also the policy of Clinic A that we maintain a credit card number on file. This allows us to bill patients for an outstanding balance that is not collected within 120 days of the date the patient was initially invoiced/billed. Clinic A will not bill any charge to any credit card without first informing the patient of this in writing. The patient will then have the right to use an alternate form of payment if they so choose.

Fire Drills

Clinic A schedules drills throughout the year for employee safety. The supervisor can answer any questions the staff member may have about what to do. An emergency evacuation plan is posted in the lab and in the lunchroom.

*Upon discovery of a fire:*

1. All staff members will evacuate the building, if necessary, including assisting in a patient evacuation.
2. Call fire department at 911.
3. Provide this information:
   1. Identify name and the building address
   2. Identify where the fire is located
   3. Give details of the fire emergency

First Aid

In case of an injury, a first aid kit is located in the lab and employee lounge. An eye wash station is located in the lab for eye injuries.

In the event of a serious injury or illness, call 911 immediately. Federal law (“OSHA”) requires that Clinic A keep records of illnesses and accidents, which occur during the workday. If a staff member is hurt or becomes ill, please contact the supervisor for assistance. If a staff member fails to report an injury, the staff member may jeopardize their right to collect workers’ compensation benefits as well as healthcare benefits. OSHA also provides for a staff member’s right to know about any health hazards, which might be present in the work environment.

Health Insurance Portability and Accountability Act (HIPAA)

Clinic A providers, staff and management will abide by all aspects and requirements of HIPAA, including but not limited to:

* Privacy
* Security
* Breach Notification
* Business Associates
* Marketing
* National Provider Identifier
* National Employer Identification Number

## Failure to adhere to Clinic A’s HIPAA policies and procedures will result in immediate termination.

Housekeeping

Clinic A expects its staff members to conduct themselves in a professional manner while in the workplace. Personal offices should always be kept clean, orderly and fully stocked with supplies. All equipment should be properly shut down.

Personal effects should be kept to a minimum.

Smoking is strictly prohibited in all practice buildings and parking areas.

Non-alcoholic beverages may be taken into the clinic. Care though must be taken to protect computers, printers, and other machines from damage. Clean-up of dishes will be the responsibility of each employee. Staff members should not consume food in patient contact areas.

**Infection Control**

Clinic A believes in their responsibility to take reasonable actions to control the risk of possible contamination and the spread of communicable diseases. All audiologists or hearing instrument specialists would be classified under OSHAs Category II: Some tasks in normal work routine may lead to exposure to blood or other infectious substances, but exposure is not inherent in the job.

All audiologists or hearing instrument specialists are required to be familiar with infection control procedures.

**Late Arrival Policy**

It is very important that patients inform Clinic A within 24 hours of their appointment if they need to cancel or reschedule. While Clinic A realize that emergencies do occur, X reserves the right to charge a $X cancellation fee for all no-show appointments or appointments cancelled with less than a 24 hour notice.

Clinic A understands that sometimes patients may be running late to their appointment. Unfortunately, Clinic A has patients scheduled throughout the day and may not be able to see the late arriving patient if they arrive more than 15 minutes after their scheduled appointment time. Clinic A will try to accommodate the patient if time and schedule allows. Otherwise, Clinic A will need the patient to come back later in the day, if a later appointment is available or reschedule to another date and time.

**Liability Insurance**

Professional liability insurance is required for all audiologists and hearing instrument specialists. Audiologists or hearing instrument specialists must carry liability coverage of, at least, $1,000,000 per incident and $3,000,000 aggregate.

Managed Care

*Contractual Requirements, Administrative Guidance, and Medical Policies*

It is the responsibility of Clinic A providers and staff to be knowledgeable of Medicare, Medicaid and private insurance contractual requirements, administrative guidelines and medical policies and practice within those requirements, guidelines and policies. Claims denials, underpayments, audits, or utilization reviews that are the result of a provider not following a published requirement, guideline or policy can result in corrective action or termination.

*Credentialing*

It is the provider’s responsibility to maintain their credentialing status with Medicare, Medicaid and private insurers. All Medicare revalidations must be completed within 45 days of receipt of the notice from Medicare or the administrative contractor. All providers must enroll in CAQH and maintain their CAQH credentialing. Claims denials that are the result of a provider’s inaction in maintaining credentialing can result in corrective action.

*Payment in full*

For in-network, participating providers with a managed care plan, Clinic A must accept the allowable rate (inclusive of co-payments, co-insurance and unmet deductibles) as payment in full, unless otherwise allowed by written contract or medical policies. Balance billing is prohibited. Clinic A may collect their usual and customary fee for non-covered items and services once notification of non-coverage is completed.

Medicare non-participating providers may accept assignment on a claim by claim basis or may bill the patient the Medicare Limiting Charge for covered services. Clinic A may collect their usual and customary fee for non-covered items and services.

For out of network providers, Clinic A may collect the Medicare Limiting charge (for Medicare Part C claims) for covered services and their usual and customary fee for non-covered items and services. Otherwise, Clinic A may collect their usual and customary rate fro all items and services on the date of service.

*Hearing aid upgrades*

Every payer does not allow for hearing aids upgrades. For those payers who do not allow for upgrades (as the allowable rate is considered payment in full) the provider must fit a product within the hearing aid benefit. If the patient wants to receive a more deluxe or technologically advanced hearing aid product, the patient:

* Needs to be referred to an out of network provider.
* Referred to a third-party administrator or provider network that contracts with this payer for covered services.
* Waive their insurance benefits and complete an Insurance waiver.

Those payers that allow for upgrades require that the patient is offered an audiologically appropriate hearing aid option within their benefit. If the patient chooses a more deluxe or technologically advanced hearing aid product, the patient mist complete an Upgrade Waiver and pay the difference between the allowable rate and usual and customary cost of the upgraded item.

*Non-covered services*

As required by payer, providers must have the patient review and complete a notice of non-coverage prior to rendering services and dispensing items who are excluded from insurance coverage or which do not meet the definition of a medically necessary insurance benefit.

Medical Record Retention

All protected health information and medical records must be maintained for a minimum of six years or \_\_\_\_\_\_\_\_\_ years as required by State of \_\_\_\_\_\_\_\_\_\_\_\_\_\_ medical record retention laws or payer requirements.

Clinic A charges for medical record copying and transmission in accordance with State of \_\_\_\_\_\_\_\_\_\_\_\_ laws. Clinic A charges \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for medical record copying. Clinic A charges \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ for downloads of medical records to USB drives. Clinic A charges \_\_\_\_\_\_\_\_\_\_\_\_\_ for shipping of medical records.

Personal Phone Calls

The staff members and facilities of Clinic A must be available during working hours to serve their patients. Personal telephone calls should be limited to those, which are absolutely necessary, and these calls should be as brief as possible. Personal long distance calls are prohibited unless authorized by the supervisor. Abuse of the phone or communication systems or policies is grounds for immediate dismissal.

**Position on the AuD**

The management of Clinic A fully supports audiologists obtaining the Doctorate degree in Audiology (AuD). Audiologists though must use the degree designate (AuD) in accordance with the ethical standards outlined by the American Speech-Language-Hearing Association, and American Academy of Audiology. Audiologists who earn an AuD from a "regionally accredited institution" may use the title of "Dr." or the degree designator "AuD" as long as they do abide by the following:

1. They may not "misrepresent their educational degrees, training, credentials or competence",
2. They may not make "representations which are false, misleading, or deceptive", and
3. They must not "practice medicine or surgery or osteopathic medicine or surgery, or perform a task in the normal practice of medicine and surgery or osteopathic medicine or surgery that is delegated by a licensed physician".

The staff members must be aware that consumers and/or patients may be confused by the use of the title "Dr." by an ancillary health professional that is not licensed to practice medicine. Patients must be appropriately informed of the distinction between an M.D., a Ph.D. and an AuD. Audiologists with an AuD degree must present themselves as Clinical Doctors of Audiology and not medical doctors (M.D.) or Doctors of Philosophy (Ph.D.). Any purposeful or deliberate misrepresentations of their educational degrees, training, credentials, competence or experience would be subject to disciplinary action.

Safety Rules

All on the job injuries or illnesses, regardless of how small or insignificant, must be reported immediately to the supervisor. Appropriate treatment or referral will be obtained when needed. An Incident form must be completed and submitted to the Supervisor within 24 hours of the incident.

Please adhere to the following safety guidelines:

* Only use equipment and tools that the staff member is qualified to use.
* Do not make repairs on electrical equipment unless authorized to do so by the supervisor.
* Do not block fire exits.
* Insure that each location has a fire extinguisher that is in proper working order.
* Do not lift packages or equipment weighing more than 20 pounds alone.
* Utilize proper safety equipment (i.e. gloves, goggles) when required.
* Avoid overloading electrical outlets with too many appliances or machines.
* Use flammable items, such as cleaning fluids, powders, monomers, and other lab chemicals with caution. An exhaust fan shall be turned on for 10 minutes on the hour.

If a patient or visitor is involved in an accident, give immediate assistance. As soon as the individual is comfortable, call 911 when appropriate. Do not move the individual. Contact the supervisor immediately. An Incident form must be completed and forwarded to the supervisor within 24 hours of the incident.

Failure to adhere to these rules can be considered grounds for termination**.**

Security

The employee’s safety and well-being are of primary concern at all Clinic A locations. At the same time, each employee has a role to play in insuring that their work environment is safe. Reporting any unsafe conditions is one way that all staff members can contribute to these efforts. Knowledge of, and compliance with, the organization’s safety and security procedures is required of every employee. The alarms are to be set each time the office is left unattended. The last employee to leave the premises is responsible for the final securing of all offices. Any patients who are in the building after hours are to be escorted to their vehicle in order to ensure their safety.

The safeguarding of personal effects at Clinic A is the responsibility of each staff member. Clinic A cannot be held responsible for the loss of personal effects, including cash or cell phones.

Failure to secure the office can be considered grounds for disciplinary action, up to and including termination.

Sexual Harassment Policy

Sexual harassment is a prohibited practice. For purposes of this policy, sexual harassment is defined as follows:

1. Sexual contact of any nature, which is not freely and mutually agreeable to both parties.
2. Communications of a sexual nature, whether verbal or non-verbal, written or pictorial, which are made for the purpose of intimidating or humiliating the person receiving such communications.
3. Attempts that are made to impose preferential or adverse treatment or make threats concerning an individual’s conditions of employment for the purpose of obtaining sexual contact of any nature.

Staff members who feel they have been sexually harassed should contact their supervisor or immediately. An informal determination will be made, and a fair and equitable resolution consistent with the above policy will be implemented. Every effort to protect the privacy of both the complainant and the accused will be made. If an informal resolution is not achieved, the employee may submit a formal grievance in written form.

Solicitation

Solicitation of co-workers, patients, professional contacts, etc. to purchase any item or service from a staff member or a family member of a staff member is strictly prohibited without the prior approval of the supervisor. This includes, but is not limited to school or organization fundraising activities, sponsorships, product party invitations, and events

State Audiology and Hearing Aid Dispensing Laws

Individual audiology and hearing aid dispensing staff are responsible for being informed of the statutes, rules and regulations associated with the practice of audiology and/or hearing aid dispensing within the State of (insert state name). Clinic A is not responsible for issues arising from lack of knowledge of these regulations.

*Licenses*

Professional staff is responsible for proper maintenance of licenses and all continuing education requirements for the State of (insert name of state). Failure to maintain an audiology and/or hearing aid dispensing license can result in immediate termination.

Telepractice

Providers can provides services via telepractice as technologically possible and in accordance with HIPAA Security policies and state and federal audiology, hearing aid dispensing and telepractice statutes and regulations.

Patients need to authorize and acknowledge their willingness to participate in telepractice.

Use of Communication Systems

It is the intent of Clinic A to provide the communication systems necessary for the conduct of its business. Staff members are expected to adhere to proper use of all communications systems including but not limited to the telephone, fax, text messaging, electronic mail (E-Mail), video and voice mail.

The communication systems are owned and operated by Clinic A and are to be used for the business of Clinic A only. Staff members should have no expectation of privacy of any correspondence, messages or information contained within these systems.

All telephone, text, fax, e-mail, video and/or voice mail messages are the property of Clinic A Clinic A reserves the right to access and disclose all such messages sent or received for any purpose. All such messages, regardless of content or the intent of the sender, are a form of corporate correspondence, and are subject to the same internal and external regulation, security and scrutiny as any other corporate correspondence. Except as identified, Clinic A’s communication systems will not be used to solicit or address staff members regarding commercial, religious, or political causes; nor will the system be used in ways that are disruptive or offensive to others. In an attempt to protect the patient confidentiality and the intellectual property and reputation of Clinic A, staff should refrain from posting any information on behalf of or in relation to Clinic A on their personal Facebook, LinkedIn, Instagram, Twitter, or social media accounts.

Staff members will not attempt to gain access to another employee’s personal telephone, text, fax, e-mail, video and/or voice mail messages. However, Clinic A reserves the right to access an employee’s messages at any time without prior notice to the employee.

Transmission of sexually explicit images, messages, cartoons, ethnic slurs, racial epithets, political posts or anything that may be construed as harassment or disparagement of others based on race, national origin, sex, sexual orientation, age, disability, or religious or political beliefs are specifically prohibited.

Personal cell phones, tablets, pagers, beepers and any other personal communication devices are to be turned OFF during normal office hours except during lunch and in the event of an emergency.

It is the responsibility of all staff members to notify their supervisor immediately if they observe any abuse of the communications systems or computer systems, or if they know of any equipment that is not functioning properly.

Changing the settings on computers and downloading files from the Internet are both considered grounds for disciplinary action, up to and including termination.

Visitors in the Workplace

Personal visitors are not allowed in the workplace and facilities during the workday. Visitors are never allowed in the building during evening or weekends without the authorization of the supervisor. Unauthorized access of the building could be grounds for immediate dismissal.