

Policies for Review for January 2022

RHS Policies

3.0.03 Adolescent Services: Added verbiage to keep in compliance for the Health Council site visit.

3.0.08 Contraceptive Services: Added verbiage to keep in compliance for the Health Council site visit.

3.0.11 HIV Risk and Risk Reduction Counseling: Added verbiage to keep in compliance for the Health Council site visit.

3.0.17 Pregnancy Testing and Counseling: Added verbiage to keep in compliance for the Health Council site visit.

RHS Referral Resources: Updated Prenatal Care provider.

Clinical Policies

10.0.50 Changing Primary Care Providers: Added that the request could be initiated by the patient or the provider with process of the steps needed. Included that staff will assist a patient with the proper paperwork if the patient requests.

Training & Education Plan

18.0.1 Training Plan 2022: New Training Plan for 2022

Training Plan Attachment:

Governance:

19.0.02 Conflict of Interest Policy: Minor grammatical changes.

Conflict of Interest Statements Attachments: No changes suggested.

19.0.03 Standards of Conduct: Minor grammatical changes.

Policies for Review in February:

OSHA

SUSQUEHANNA COMMUNITY HEALTH & DENTAL CLINIC, INC.

Adolescent Services

Policy Category: 3.0.03 Reproductive Health Services
Policy Owner: Clinical Operations Manager
Origination Date: 04/27/2020
First Date Approved by Board of Directors: 04/27/2020

Purpose:

To ensure that adolescent services are provided in a “youth-friendly” manner, meaning that they are accessible, equitable, acceptable, appropriate, comprehensive, effective, and efficient for youth, regardless of gender or gender identity.

REGULATIONS:

- Staff must not require written consent of parents/guardians for the provision of services to minors.
- Staff must not notify parents or guardians before or after a minor has requested services.
- Staff must not assume that adolescents are sexually active because they have come for services. (Many teens are seeking assistance in reaching this decision).
- Staff must not coerce patients to use contraception or to use any one method of contraception.
- Staff must inform patients that services are voluntary and confidential except in cases of mandatory reporting requirements.
- Follow-up is provided to increase probability of satisfaction with and on-going use of services.
- All counseling and education will be documented in the patient’s medical record.

PROCEDURES:

- Appointments will be made available to adolescents for medical services and counseling as soon as possible. Walk-in appointments for teens are available to address their needs if an adolescent presents for a visit.
- Assure adolescents that services are confidential and private.
- Assess adolescent/parent/guardian communication. Encourage discussion with a trustworthy adult if talking with parent/guardian is not probable.
- Provide adolescents with skilled counseling and detailed information as indicated on:
 - Resisting attempts of coercion regarding sex, including physical force or emotional manipulation
 - Using abstinence as a valid and responsible option
 - All contraceptive methods
 - Preparing adolescents to use a variety of methods effectively
 - Negotiation skills
 - Explanation of STD/HIV symptoms, prevention, and treatment
 - Using condoms to reduce the risk for STIs/HIV and pregnancy
 - Sexual abuse and date rape
 - ~~Encouraging family involvement in seeking family planning services. If not~~

SUSQUEHANNA COMMUNITY HEALTH & DENTAL CLINIC, INC.

~~discussed, the reason will be documented in the patient's medical record.~~

- Clarification of any misinformation about notification to parents and written consent
- Assure adolescents that if any follow-up is necessary, every attempt will be made to assure the privacy of the patient.
- Obtain an alternate phone number or agreed upon method for contact, i.e. text message, picture text, such as a butterfly, or some other agreed upon signal that will let the patient know that they should contact the Center.
- All attempts at follow-up will be documented in the patient's medical record.

REVIEWED: 03/11/2021, 06/01/2021, 01/10/2022

REVISED: 04/26/2021

Signatures:

Kimberly Wetherhold., Board Chair

James Yoxtheimer, President & CEO

Date:

SUSQUEHANNA COMMUNITY HEALTH & DENTAL CLINIC, INC.

Contraceptive Services

Policy Category: 3.0.08 Reproductive Health Services
Policy Owner: Clinical Operations Manager
Origination Date: 04/27/2020
First Date Approved by Board of Directors: 04/27/2020

Purpose:

Contraceptive services are offered to clients, ~~including women, men, and adolescents~~, who wish to delay or prevent pregnancy including women, men, and adolescents, as appropriate regardless of gender or gender identity. Clients may not be coerced to use contraception or to use any particular method of contraception or service.

Policy:

Contraceptive services include:

- Consideration of a full range of FDA-approved contraceptive methods and natural family planning methods and fertility awareness-based methods (FABMS)
- Brief assessment to identify the contraceptive methods that are safe for the client (US Medical Eligibility Criteria for Contraceptive Use)
- Contraceptive counseling to help a client choose a method of contraception and use it correctly and consistently
- Provision of one or more selected contraceptive method(s) on site

STEP 1 – Establish and maintain rapport with the client

- Use of open-ended questions
- Demonstration of expertise, trustworthiness, and accessibility
- Assurance of privacy and confidentiality
- Explanation of how personal information will be used
- Encouragement of client to ask questions and share information
- Listening to and observing the client
- Being encouraging and demonstrating empathy and acceptance

STEP 2 – Obtain clinical and social information

- Take medical history to ensure that methods of contraception being considered are safe (based on QFP guidelines, pp 7-8)
- Take a social history to learn about factors that might influence the choice of method, including:
 - Reproductive life plan to clarify whether the client wants to have any or more children, and, if so, the desired timing and spacing
- Contraceptive experiences and preferences, including:
 - Current method
 - Methods used in the past and any difficulties

SUSQUEHANNA COMMUNITY HEALTH & DENTAL CLINIC, INC.

- Previous use of emergency contraception
- Contraceptive use at last sex
- Method in mind
- Discussion of method options with partner and partner preferences
- Sexual health assessment (history and risk assessment)
 - Sexual practices, i.e. vaginal, anal, or oral sex
 - Contraceptive experiences and preferences (see above)
 - Partners, i.e. number, gender, and if partner had sex with another partner while still in a relationship with the patient
 - Past STD history, both patient and partner
 - Steps taken to prevent STDs, i.e. condom use, situations that make it harder or easier to use condoms, discussion of monogamy and abstinence

STEP 3 – Assist client to interactively select the most effective and appropriate contraceptive method

- Family planning contraceptive services should be offered with a client-centered approach that is respectful of and responsive to individual client preferences, needs, and values. Client values guide all clinical decisions.
- Using a tiered effective approach, the provider will discuss with client's information on a broad range of FDA approved methods, including LARCS, by presenting the most effective (Tier 1) methods first, then moderately effective methods (Tier 2), then less effective methods (Tier 3).
- Educate client about methods that can be used safely
 - Method effectiveness
 - Correct and consistent use of method
 - Non-contraceptive benefits
 - Risks and side effects, including ways to deal with side effects
 - Starting the method
 - Danger signs and what to do
 - Protection from STDs and HIV
 - Availability of emergency contraception
 - When to return for follow-up
- Discuss potential barriers to use of the methods
 - Social-behavioral factors, i.e. client's feelings about method, how partner is likely to respond, peers's perception of method, confidence in being able to use the method correctly and consistently
 - Intimate partner violence and sexual violence (relationship issues that might be potential barriers to contraceptive use)
 - Mental health, such as depression/anxiety, and substance abuse issues that might interfere with motivation or ability to follow through with contraceptive use
- Discussion of reproductive life plan

Formatted: Font: Bold

Formatted: List Paragraph, Bulleted + Level: 1 +
Aligned at: 0.25" + Indent at: 0.5"

Formatted: Font: Bold

STEP 4 – Conduct physical assessment related to contraceptive use, when warranted (refer to Table 1, p. 12 in QFP)

SUSQUEHANNA COMMUNITY HEALTH & DENTAL CLINIC, INC.

STEP 5 – Provide contraceptive method on-site

- Discuss “Quick Start” if provider can be reasonably sure the patient is not pregnant (see below on how to be reasonably sure a woman is not pregnant)
- Provide or prescribe multiple cycles (ideally for a full year) of oral contraceptives or the vaginal ring to minimize the number of times a patient must return
- Provide instructions about correct and consistent use
- Help client develop a plan for using the method correctly and consistently, including discussion of barriers
- Make condoms easily available at “no cost”
- Develop a plan for follow-up to discuss initial difficulties and reinforcement of provider accessibility and to increase rapport
- Confirm client understanding and document in chart; utilize teach-back method by asking client to repeat back messages about risks, benefits, and appropriate method use and follow-up
- Provide information about emergency contraception

Stock Products Include:

- Oral Contraceptives
- Hormonal Injections
- Vaginal Ring
- Hormonal Implant
- IUD
- Condoms
- Diaphragm

How to Be Reasonably Certain a Woman is Not Pregnant:

- Is less than or equal to 7 days after the start of normal menses
- Has not had sex since the start of last menses
- Has been correctly and consistently using a reliable method of contraception
- Is less than or equal to 7 days after spontaneous or induce abortion
- Is within 4 weeks postpartum
- Is fully or nearly fully breastfeeding (exclusively breastfeeding or at least 85% of the time)

REVIEWED: 08/14/2020, 06/01/2021, 01/10/2022

REVISED: 08/24/2020, 06/21/2021

Signatures:

SUSQUEHANNA COMMUNITY HEALTH & DENTAL CLINIC, INC.

Kimberly Wetherhold, Board Chair

James Yoxtheimer, President & CEO

Date:

SUSQUEHANNA COMMUNITY HEALTH & DENTAL CLINIC, INC.

HIV Risk and Risk Reduction Counseling

Policy Category: 3.0.11 Reproductive Health Services
Policy Owner: Clinical Operations Manager
Origination Date: 04/27/2020
First Date Approved by Board of Directors: 04/27/2020

Purpose:

To provide a standard of care for counseling patients on HIV that will enable the patient to make informed choices.

Procedure:

All patients of Reproductive Health Services receive HIV risk reduction counseling, STD testing and counseling should be offered to adults and adolescents, as appropriate, regardless of gender or gender identity. Counseling is customized for each patient; however, there are basic discussions around each of the following:

- Sexual development and basic female/male reproductive anatomy/physiology, if indicated
- Abstinence education
- Assess patient's knowledge about HIV symptoms, treatment, and prevention
- Patient and partner sexual and drug use history
- Determine client's assessment of personal risk
- How to resist coercive attempts to engage in sex
- Identify and negotiate realistic plan to reduce risk: abstinence, mutual monogamy, proper condom use, limit number of sexual partners, limit use of alcohol and/or other drugs, and if using drugs, sterilize drug injection equipment and do not share injection equipment
- Availability of information and educational materials based on patient's needs and knowledge
- Availability of condoms
- Determine if client wishes to be tested

Special attention is given to adolescents. In addition, to the topics above, the following discussions take place:

- Assurance of confidentiality and that every attempt will be made to ensure the patient's privacy
- Availability of services without parental consent or notification of parents
- Encouragement of family involvement in the decision to seek services

Currently, anyone wishing to be tested for HIV is referred to our STD Clinic.

SUSQUEHANNA COMMUNITY HEALTH & DENTAL CLINIC, INC.

REVIEWED: 06/01/2021

REVISED:

Signatures:

_____ Date:
| Kimberly Wetherhold ~~John Bell, Jr. D.O.~~, Board Chair James Yoxtheimer, President & CEO

SUSQUEHANNA COMMUNITY HEALTH & DENTAL CLINIC, INC.

Pregnancy Testing and Counseling

Policy Category: 3.0.17 Reproductive Health Services
Policy Owner: Clinical Operations Manager
Origination Date: 04/27/2020
First Date Approved by Board of Directors: 04/27/2020

Purpose:

To provide pregnancy diagnosis and counseling to all clients in need of this service, in accordance with recommendations of major professional medical organizations such as the American College of Obstetricians and Gynecologist (ACOG) and the American Academy of Pediatrics (AAP).

Pregnancy Testing Includes:

- General consent for services signed by the patient yearly
- Medical history
- Reproductive Life Plan discussion
- Qualitative urine test with high sensitivity
- Quantitative serum pregnancy test for diagnosis and management if needed
- Discussion of test results with the patient

Positive Pregnancy Test Process:

- Estimation of gestational age (if LMP is uncertain, a quantitative serum pregnancy test may be ordered)
- Information about normal signs and symptoms of early pregnancy
- Instructions on when to report any concerns to a provider for further evaluation
- Referral for immediate diagnosis and management if suspicion of ectopic pregnancy or other pregnancy abnormalities
- Provision of counseling and referral resources

~~Every woman who is medically verified as being pregnant must receive counseling by a physician or Advanced Practice Provider (CRNP, PA, CNM) unless the patient does not wish to receive such information and counseling.~~

Options counseling must include:

- Discussion of accessing prenatal care and delivery, infant care, adoption or foster care, and pregnancy termination. ~~All counseling questions concerning termination must be handled by a physician or Advanced Practice Provider (CRNP, PA, CNM)~~
- Referrals to appropriate providers for follow-up care at the patient's request
- Assessment of client's social support and referral to appropriate counseling or other supportive services as needed

Formatted: Font: Bold

SUSQUEHANNA COMMUNITY HEALTH & DENTAL CLINIC, INC.

- If requested to provide such information and counseling, provide neutral factual information, and non-directive counseling on each of the options and referral upon request, except with respect to any option(s) about which the pregnant client indicates they do not wish to receive such information and counseling.

Formatted: Normal, No bullets or numbering

Counseling on each option must be non-judgmental, non-directive, neutral and factual. Counselors will provide resources on all three options if the patient is undecided when leaving the office.

Clients who wish to continue the pregnancy are given a prenatal referral and provided with initial pregnancy counseling that includes:

- Encouragement to take a prenatal vitamin containing folic acid
- Recommendation to avoid smoking, alcohol, and other drugs
- Recommendation to avoid eating fish that might have high levels of mercury
- Advice indicating that some medications may be contraindicated in pregnancy and any current medications being taken need to be reviewed by a prenatal care provider
- STD screening (including HIV) if there might be a delay in obtaining prenatal care
- Referral for age-appropriate vaccinations if needed

Negative Pregnancy Test Process (Clients who do not want to become pregnant):

- Information about Family Planning services, including contraception
- Exploration of why the client thought she was pregnant and sought pregnancy testing
- Assessment of difficulties using a current method of contraception
- Discussion of making a Reproductive Life Plan

Negative Pregnancy Test Process (Clients who are trying to become pregnant):

- Information and services to help achieve pregnancy (basic infertility services)
- Preconception health education
- STD services
- Reproductive Life Plan

REVIEWED: 03/11/2021, 01/10/2022

REVISED: 04/26/2021

Signatures:

Kimberly Wetherhold., Board Chair

James Yoxtheimer, President & CEO

Date:

Pregnancy Testing and Counseling

RIVER VALLEY HEALTH & DENTAL CENTER

REPRODUCTIVE HEALTH SERVICES

REFERRAL RESOURCES

Sterilization - Female

UPMC Susquehanna Ob/Gyn
740 High Street, Suite 1004, Williamsport, PA 17701
Phone: (570) 321-3300

Sterilization - Male

Family Medicine Residency Center
699 Rural Avenue, SL1, Williamsport, PA 17701
Phone: (570) 321-2345

UPMC Susquehanna Urologic Associates, LTD
1705 Warren Ave., Suite 206, Williamsport, PA 17701
Phone: (570) 321-3300

Adoption

Eckels Adoption Agency
R. 915 Fifth Avenue, Williamsport, PA 17701
Phone: (570) 323-2520

Prenatal Care

UPMC Family Medicine Residency Center (Prenatal Center)
740 High Street, Suite 4001, Williamsport, PA 17701
Phone: (570) 321-2345

UPMC Susquehanna Ob/Gyn
740 High Street, Suite 1004, Williamsport, PA 17701
Phone: (570) 321-3300

Geisinger Montoursville—Women's Health

Dr. Robert Donato

780 Broad Street

Montoursville, PA 17754

Phone: 570-368-2870

Pregnancy Termination Services

Office of Amy R. Cousins, MD
149 Vestal Parkway West
Vestal, NY 13851
Phone: (607) 785-4171, or 1-800-676-9011

Formatted: Font: Bold

Allentown Women's Center
31 South Commerce Way, Suite 100
Bethlehem, PA 18017
Phone: (877) 342-5292

Philadelphia Women's Center
777 Appletree Street, 7th Floor
Philadelphia, PA 19106
Phone: (800) 869-2330

Primary Care

River Valley Health & Dental Center
471 Hepburn Street, Williamsport, PA 17701
Phone: (570) 567-5400

Physician Finder – UPMC Susquehanna
Phone: (570) 321-2160; (877) 883-4789

Nutrition

River Valley Health & Dental Center
471 Hepburn Street, Williamsport, PA 17701
Phone: (570) 567-5400

WIC Program
612 West Fourth Street, Williamsport, PA 17701
Phone: (570) 322-7656

Penn State Cooperative Extension Service
542 County Farm Road, Suite 206, Montoursville, PA 17754
Phone: (570) 433-3040

Infertility

UPMC Susquehanna Ob/Gyn
740 High Street, Suite 1004, Williamsport, PA 17701
Phone: (570) 321-3300

OB-GYN Clinic, Access Point Program
Hershey Medical Center, Hershey, PA 17033
Phone: (570) 531-8521

Geisinger Medical Center Fertility Center
100 North Academy Avenue
Danville, PA 17822
Phone: (800) 275-6401

Natural Family Planning

Donna and Kevin Howey
Phone: (570) 435-3364

Genetic Screening

UPMC Susquehanna Ob/Gyn
740 High Street, Suite 1004, Williamsport, PA 17701
Phone: (570) 321-3300

Genetic Screening/Counseling

UPMC Susquehanna Ob/Gyn
740 High Street, Suite 1004 Williamsport, PA 17701
Phone: (570) 321-3300

Milton S. Hershey Medical Center (Division of Genetics)
P.O. Box 850, Hershey PA 17033
Phone: (717) 534-8414

Medical Emergency – UPMC Susquehanna

Williamsport Regional Medical Center, Emergency Department
700 High Street, Williamsport, PA 17701
Phone: (570) 321-2000

Muncy Valley Hospital, Emergency Department
East Water Street, Muncy, PA 17740
Phone: (570) 546-4201

Emergency Contraception (if unable to purchase OTC)

Family Planning Services of Snyder, Union, Northumberland, Mifflin & Juanita Counties
650 US Highway 15 South, Lewisburg, Pa 17837
Phone: (570) 523-3600

Abnormal Exam or Test Results

UPMC Susquehanna Family Medicine Residency Center
741 High Street, Suite 4001, Williamsport, PA 17701
Phone: (570) 321-2345

UPMC Susquehanna Ob/Gyn
741 High Street, Suite 1004, Williamsport, PA 17701
Phone: (570) 321-3300

Sexual Dysfunction

UPMC Susquehanna Ob/Gyn
741 High Street, Suite 1004, Williamsport, PA 17701
Phone: (570) 321-3300

UPMC Susquehanna Urologic Associates, LTD
1705 Warren Avenue, Suite 206, Williamsport, PA 17701
Phone: (570) 326-8090

Cervical Cap Fitting

UPMC Susquehanna Ob/Gyn
741 High Street, Suite 1004, Williamsport, PA 17701
Phone: (570) 321-3300

Social Services

River Valley Health & Dental Center (Behavioral Health)
471 Hepburn Street, Williamsport, PA 17701
Phone: (570) 567-5400

Wise Options (YWCA) – Domestic Violence
815 West Fourth Street, Williamsport, PA 17701
Phone: (570) 322-4637

Lycoming County Department of Children & Youth
48 West Third Street, Williamsport, PA 17701
Phone: (570) 327-2405

STEP - Transportation
2137 Lincoln Street, Williamsport, PA 17701
Phone: (570) 326-0587

Department of Health & Human Services
400 Little League Boulevard
Williamsport, PA 17701
Phone: (570) 327-3311

Mental Health

River Valley Health & Dental Center (Behavioral Health)
471 Hepburn Street, Williamsport, PA 17701
Phone: (570) 567-5400

UPMC Susquehanna Behavioral Health Center
1000 Grampian Boulevard
Williamsport, PA 17701

Sexually Transmitted Diseases

River Valley Health & Dental Center (Reproductive Health Services)
471 Hepburn Street, Williamsport, PA 17701
Phone: (570) 567-5400

HIV Counseling & Testing Sites

River Valley Health & Dental Center (Reproductive Health Services)
471 Hepburn Street, Williamsport, PA 17701
Phone: (570) 567-5400

Pa. Department of Health, State Health Center
1000 Commerce Park Drive, Suite 109, Williamsport, PA 17701
Phone: (570) 327-3400

AIDS Resource Alliance
500 West Third Street, Williamsport, PA 17701
Phone: (570) 322-8448

Mammography Screening

Kathryn Candor Lundy Breast Health Center
1100 Grampian Boulevard, Williamsport, PA 17701
Phone: (570) 326-8200

Smoking Cessation

River Valley Health & Dental Center
471 Hepburn Street
Williamsport, PA 17701

Dental Care

River Valley Health & Dental Center
471 Hepburn Street, Williamsport, PA 17701
Phone: (570) 567-5400

Revised: 2/16/16
2/01/17
3/08/18 SW
2/22/2021 BW
01/10/2022 BW

Referral Resources

SUSQUEHANNA COMMUNITY HEALTH & DENTAL CLINIC, INC.

Changing Primary Care Providers

Policy Category: 10.0.50 Clinical
Policy Owner: Clinical Operations Manager
Origination Date: 09/25/2017
First Date Approved by Board of Directors: 09/25/2017

Policy:

The patient/provider relationship is key to creating healthier outcomes and relies upon the ability of encouraging trust and communication. Our policy is to give patients/providers a choice when establishing that relationship and changing providers is an acceptable practice within certain limitations as described in this policy. A change may be initiated by a patient or a medical provider.

Common and/or acceptable reasons to change from one provider to another may include the following:

1. As a new patient, the patient feels uncomfortable with the provider because of the provider's style of practice.
2. In the rare event that a patient requests a change due to a desire to improve the patient/provider relationship or sometimes referred to as "fit", consideration will be given to the patient's request as described below.
3. The patient has a preference to see a provider of a specific gender.
4. If a patient's medical condition changes and care might be better handled by a physician or specialist.
- 4.5. A provider may request that the patient be moved to another provider's panel if they perceive "fit" is an issue as described above.

The following reasons will not be sufficient, without additional factors, to consider changing from one provider to another.

1. The patient feels the provider is not providing appropriate care, but a chart review performed by the Clinical Operations Manager and the Medical Director shows that appropriate care is being provided.
2. The provider, in the exercise of their professional judgement, will not prescribe medications per the patient's request, such as in cases of opioids, or does not believe as to other medications, tests, or procedures that such options are appropriate treatment despite patient requests.

Process:

1. All patient requests for change of provider must be made in writing using a patient concern form, stating the reason for the request. Requests will not be processed through phone calls or email. Staff will assist patient in completing the form if need or complete on their behalf if the patient requests it.
2. The Clinical Operations Manager will review all requests for a provider change.

SUSQUEHANNA COMMUNITY HEALTH & DENTAL CLINIC, INC.

3. If the reason for the change is due to “style” or feels the provider is not a good “fit” for them in #1 above, the patient will be informed that the switch will be made. The patient will be advised ~~that they have to then continue to see the new provider they have selected for continuity of care and~~ that provider changes are one time only. The Clinical Operations Manager or Care Team will ~~may~~ choose a provider that may be the best fit for the patient if the patient does not have a provider choice. The Clinical Operations Manager or designee will inform the new provider and the previous provider that a switch has occurred. An alert will be placed on the patient chart in eCW.
4. ~~If the reason for the change is due to “fit” in #2 above, the Clinical Operations Manager or Care Team will ask the patient~~ The patient may be asked to meet with their current provider to facilitate a discussion about their concern ~~transfer~~. If the patient agrees, a Care Team member may accompany the patient on their next visit and facilitate the conversation between the patient and the provider ~~about switching~~. If the transfer is still desired after that discussion or the patient does not wish to have a discussion, the patient will be informed that the switch will be made. The patient will be advised ~~that they have to then continue to see the new provider they have selected for continuity of care and~~ that provider changes are one time only. The Clinical Operations Manager or Care Team may choose a provider that may be the best fit for the patient if the patient does not have a provider choice. The Clinical Operations Manager or designee will inform the new provider and the previous provider that a switch has occurred. An alert will be placed on the patient chart in eCW.
5. If the stated reason does not merit a change in providers, the Clinical Operations Manager or Care Team member will contact the patient and explain the situation.
6. ~~When a switch is made at the patient’s request, the new provider and the prior provider will be informed of the switch and the reason why.~~
7. ~~6.~~ If a patient makes a second request for a provider change, a complete chart review will be done by the Clinical Operations Manager and the Medical Director. ~~The Clinical Operations Manager will discuss the reason with both the patient and the provider for their concerns/feedback.~~ A decision will be made by the Clinical Operations Manager and the Medical Director and all parties will be informed of the decision.

Provider Request to reassign patient to another provider:

~~A provider may request a transfer of the patient to another provider. The provider will take their request to the Clinical Operations Manager and a potential new provider will be chosen. The provider will discuss their reason for the request with the new provider and the new one has an opportunity to accept or decline. If all agree, the transfer will take place. If the provider declines, the switch will not be made. If the provider accepts, the Clinical Operations Manager or Care Team member will contact the patient and inform them of the transfer of care.~~

1. Requesting provider contacts the Clinical Operations Manager and completes a “PCP change request form.” The provider will determine a new provider for the transfer.
2. Current provider gives accepting provider a summary of the patient information.
3. The accepting provider will approve or decline the request. If all agree, the switch will be made. If the accepting provider declines, a switch will not be made.

SUSQUEHANNA COMMUNITY HEALTH & DENTAL CLINIC, INC.

4. The Clinical Operations Manager or designee will notify the patient of the decision. An alert is placed on the patient chart in eCW.

5. In cases where the provider wishes to dismiss a patient from the Center, a PCP change request form will be completed by the provider. The Clinical Operations Manager will review the request and initiate the Dismissal from Care policy 12.0.04.

REVIEWED: 10/01/2018, 11/01/2020, 01/10/2022

REVISED: 10/22/2018, 11/23/2020

Signatures:

Kimberly Wetherhold., Board Chair

James Yoxtheimer, President & CEO

Date:

Provider Change Request Form

Request initiated by: _____ Provider _____ Date _____

Patient Name _____ DOB _____

Current provider: _____

Suggested new provider: _____

Reason for change request:

Disposition: ☐ request approved ☐ request denied

Internal Use Only:

- ☐ Operations Manager review
- ☐ Previous Provider consulted
- ☐ New Provider consulted
- ☐ Patient notified
- ☐ PCP changed in eCW
- ☐ Alert placed in eCW

Comments:

Operations Manager signature: _____ Date: _____

2022 TRAINING PLAN

Course ID	Name	Description	Environment	2022 Training (Completion) Dates
All New Staff	New Staff Orientation	Participation in the training will satisfy annual continuing education requirements for safety and compliance.	Relias Training Portal	As Needed
All Staff	Trauma-Informed Care	Participation in this training will provide staff with tools to identify aid patients with mental illness.	Classroom	January-February 2022
All Staff	General Safety: OSHA & Workplace Safety	Successful completion of this learning session will satisfy annual continuing education requirement for safety, internal disaster training, and fire safety. This learning does not exempt participation in hands-on safety drills. Training will include ergonomics and avoidance of slips, trips and falls, safety data sheets, bloodborne pathogens, active shooter, and OSHA.	Relias Training Portal and PowerPoint	May-June 2022
All Staff	Emergency Preparedness	Training and demonstration as required by CMS and planned by Safety Committee	Classroom and Exercise	July 2022
All Staff	HIPAA Refresher	Successful completion of this learning session will satisfy annual continuing education requirement for HIPAA.	Relias Training Portal	December 2022
All Staff	Compliance Overview	This training will present the key elements of the Center's compliance policy and plan, focusing on the role all employees play in ensuring the plan is carried out effectively.	Relias Training Portal	August 2022
All Staff	Cultural Competencies & Diversity; Harassment & Sensitivity Training; Health Literacy	Learners will explore the various courses to assist with problem solving and coping skills based upon individual needs in consultation with their supervisor to include topics of culture, methods of communication, and strategies for dealing with issues of conflicts and/or promotion of diversity in the workplace.	Relias Training Portal	September-October 2022
All Staff	Mandatory Reporter Training (Child Abuse)	All clinical staff and providers are required to complete this program and will be documented for purposes of licensure or compliance requirements.	Online-University of Pittsburgh or other approved course by licensing body	Ongoing as needed (every 2 years for licensed staff; every 5 years for non-licensed staff)
All Staff	Stress Management	This training outlines strategies to deal with stress and avoiding burnout	Relias Training Portal	August 2022

2022 TRAINING PLAN

Safety Committee Members Annual	Workplace Safety Committee Training	Annual training for implementation of the Workplace Safety Committee to introduce workplace safety committee members (management and employees) to the requirements of ACT 34 for purposes of Workers' Compensation policy credits and cost reductions. To enable the creation and maintenance of workplace safety committees which promote the reduction of injury and illness.	Insurance Co. Representative	June 2022
All Providers	FTCA and Risk Management; EHR Refresher; Compliance; Billing and Coding	All providers will be required to attend these learning sessions or demonstrate comparable CME study. Sessions will be led by members of the senior staff.	Classroom	Monthly Provider Meetings
Care Management Team	Self-Management, Care Coordination: Best Practices and Population Health	All members of the Care Management Team will complete training to ensure best practices for care coordination and motivational interviewing tactics.	Relias Training Portal	November 2022
Dental Clinical Staff	X-Ray Refresher	All clinical staff and providers are required to complete this program and will be documented for purposes of licensure or compliance requirements.	Online	Ongoing
Dental Clinical Staff	Dental Equipment Sterilization	This training will provide an overview on the proper protocols surrounding dental equipment sterilization	Classroom	May 2022
Providers, Pharmacy & Billing Staff, Key Management	Medicare Fraud, Waste, and Abuse	This training will satisfy the annual requirement surrounding Medicare fraud, waste, and abuse.	Relias Training Portal	November 2022
Finance Department	340B Drug Discount Program	This training will cover the nuances of the 340B program including duplicate discounting, patient definitions, and how they can affect financial performance.	Relias Training Portal	March 2022
Finance and Data Analyst	Microsoft Excel Courses	This training will allow staff to work efficiently in Microsoft Excel-a key function of the job.	Relias Training Portal	May 2022
Clinical Staff and Selected Non-Clinical Staff (as space allows)	CPR, Recertification	This training is a recertification workshop coordinated by QA/QI Manager.	Classroom	Ongoing

2022 TRAINING PLAN

Women's Health Providers and Nurse	Obstetrical Procedures and Human Trafficking	The obstetrical procedure training includes shoulder dystocia: prediction, prevention, and management. The human trafficking training will provide staff with critical steps to recognize and respond to the scenario.	Relias Training Portal	February 2022
Medical and Dental Clinical Staff	Clinical In-Service Training	This assessment/training is an annual clinical skills competency check for all non-provider clinical staff. The program is coordinated and led by Nursing and Hygienist staff	Classroom	TBD as needed for periodic assessment
Medical and Dental Clinical Staff	Infection Control	This training will cover the basics of infection control including the prevention and transmission of infections from one person to another—methods and precautions and hand hygiene.	Relias Training Portal	July 2022
Medical Clinical Staff	Tuberculosis Basics	This course will review signs and symptoms and available testing procedures, as well as treatment and prevention related to this disease.	Relias Training Portal	August-September 2022
Medical Clinical Staff (Nurse/MAs)	Communication Skills Training	This training will include topics such as critical thinking, difficult people, effective communication, resolving conflict, and building peer relationships.	Relias Training Portal	May 2022
Office Staff and Patient Financial Services	Customer Service and Patient Engagement Training	These trainings will cover topics such as effective communication, listening engaging, facing confrontation in customer service, conflict management skills, and rapport building.	Relias Training Portal	May 2022
Office Staff, Patient Financial Services, IT, Finance, and Pharmacy	PCI Compliance Security Awareness Level 1	Level 1 training provides employees with a solid understanding of how to properly protect credit card and personal information. This course also teaches a user about basic safe internet use.	Relias Training Portal	August 2022

Approved by Board of Directors

Portal	Course ID	Course Name	Description	Credit Hours
Relias Learning	390919	Basic Communication and Conflict Management Skills	Communication with other people has an impact on almost every aspect of our lives, but we don't often stop to think about whether we are communicating in the most effective way. Moreover, poor communication skills can create bad feelings and prevent career advancement. Communication is an especially important skill for support staff, which is often called upon to interact with a wide range of people on a daily basis. This course takes a behind-the-scenes look at how communication works and identifies the key ingredients of effective communication. It builds on this foundation and introduces guidelines on how to communicate better with coworkers, community members, supervisors, and the people we support, and discusses assistive and alternative means of communication. The final section of the course provides instruction on how to manage conflict situations at work. The course will use scenarios, critical thinking, and matching exercises to review information and help you to use new ideas in context. This course is intended for support staff in the disabilities field.	1.75
Relias Learning	737913	Critical Thinking	Critical thinking is useful for examining an issue or problem logically. This Challenge Series product explores applying the critical thinking process.	0.25
Relias Learning	732253	Providing Effective Internal Customer Service	When you do things to help other people within your company do their jobs better, you are providing internal customer service. The quality of that service often has a huge impact on the overall quality of service delivered to external customers. In this course, you'll learn about types of internal customers and how to identify internal customer service relationships. You'll also learn about the importance of getting to know your internal customers, identifying their expectations of you, and taking action on those expectations. Finally, you'll learn guidelines for providing internal customer service.	0.5
Relias Learning	730697	Take a Deep Breath and Manage Your Stress	If you find you're constantly adding items to your neverending to-do list, feeling overwhelmed at work and at home, and finding your health and relationships negatively impacted, you are likely experiencing stress. Stress is produced by your own feelings and reactions to certain external events, rather than by the events themselves. This means that while you may not always be able to control the external events causing you stress, you can control your reactions to them and how you handle them. This course explains the physiological, behavioral, and psychological signs and symptoms of stress and where it can come from. The course outlines strategies for dealing with stress and avoiding burnout. It also covers ways to change your responses to stress and make them more positive and how to use relaxation techniques such as breathing and meditation to help you cope.	0.4
Relias Learning	1211219	Tuberculosis Basics	Approximately 8,900 new cases of tuberculosis, or TB, were reported in 2019 and it is estimated that 13 million people in the U.S. are living with latent TB (Centers for Disease Control and Prevention [CDC], 2020a). While these numbers are some of the lowest in the world, it is important for all healthcare providers to have a general understanding of this disease. This course will review signs and symptoms and available testing procedures, as well as treatment and prevention related to this disease. The goal of this course is to provide all healthcare providers with a basic understanding of tuberculosis.	0.5
Relias Learning	777485	Shoulder Dystocia: Prediction, Prevention, and Management	Shoulder dystocia is a vaginal delivery that requires a series of additional maneuvers to deliver the infant after routine, gentle traction of the head has failed. Nearly half of all shoulder dystocias occur in the absence of risk factors, making them largely unpredictable and unpreventable. Perinatal morbidity and mortality rates associated with shoulder dystocia are high, even when properly managed. Although considered an obstetric emergency, shoulder dystocia can usually be managed uneventfully by a well-trained obstetric provider and a team of nursing/resuscitation professionals. The goal of this course is to equip nurses in acute care settings with knowledge of current evidence regarding prediction, prevention, and management of shoulder dystocia, and the importance of accurate, thorough communication and documentation.	1
Relias Learning	529195	Cultural Competence	As workplaces become more diverse, effective and successful employees must become more knowledgeable of other cultural norms, be respectful of the wide range of cultural behaviors, and effectively communicate with people of various backgrounds. This course provides important information about becoming more respectful and culturally competent.	0.5
Relias Learning	567109	HIPAA: The Basics Self-Paced	The Health Insurance Portability and Accountability Act, commonly called HIPAA, protects the confidentiality and security of healthcare information. HIPAA creates and protects individual privacy rights for protected health information and governs the use and disclosure of that information. In this course you will learn about HIPAA, violations of HIPAA, and steps to take to prevent these violations. Unless otherwise noted, the information for this course is sourced from the HIPAA Administrative Requirements and HIPAA Privacy and Security laws (Department of Health and Human Services, 2013).	0.5
Relias Learning	420386	Social Determinants of Health: Education	Education is recognized as a pillar of the social determinants of health (Healthy People 2020). Education as a social determinant of health relates primarily to educational attainment - the years of overall schooling a person pursues. This course provides an in-depth analysis of how education affects the health and well-being of your patients. You will learn about four critical components: high school graduation, enrollment in higher education, language and literacy, and early childhood education and development. You will also learn how to identify education issues with your patients and construct care plans to help overcome barriers.	0.5
Relias Learning	918190	Harassment in the Workplace Self-Paced	A healthy work environment is one that is free from harassment. This course is about harassment in the workplace, including sexual harassment and other types of workplace harassment. It looks at the basic skills needed to deal with these situations, and helps you understand your role if you encounter harassment in the workplace. The goal of this educational program is to provide all employees with an overview of harassment in the workplace.	0.5

Relias Learning	863073	Care Coordination in Healthcare: Principles and Best Practices	Despite the United States possessing some of the very best technology and advances in medicine, healthcare remains fragmented and exorbitantly expensive. Many patients find themselves developing one or more chronic diseases but have little knowledge of how to navigate the healthcare system to receive appropriate care. Many times, these same patients have no insurance or are underinsured, making them less likely to have access to the resources needed. Care coordination is a deliberate process shown to decrease healthcare costs while improving the health of the patient. It is a team-based approach encompassing care by a medical team and additional services such as patient education, referrals, access to community-based services, and close monitoring. Unfortunately, because the healthcare system is fragmented and complex, care coordination does not currently have the standardized techniques or processes in place to make an optimal impact. This course will provide additional information on the process of care coordination including the various components of care coordination, ideas on how to initiate a care coordination process, and practical applications for current practice.	1.25
Relias Learning	1252093	Use of Motivational Interviewing in Clinical Practice	Motivational Interviewing (MI) is an evidence-based, client-centered approach to engaging clients in conversations about change. This course aims to build upon existing MI skills and increase your understanding of how to implement MI into existing practice. You will learn how to apply MI in challenging situations and how to combine it with other treatment modalities. You will also learn about power dynamics and other ethical considerations that could impact the relationship. Through the use of client assessment, self-reflection, and coaching, you can continue to build upon your knowledge and skills. This course uses a blend of instructive information and interactive exercises to help you understand and apply its core concepts. The goal of this course is to provide addictions, behavioral health counseling, marriage and family therapy, psychology, and social work professionals in health and human service settings with advanced MI skills that can be incorporated into a variety of treatment settings.	1.5
Relias Learning	730689	Being an Effective Team Member	To make a real, positive difference on a team, you must take on the challenging task of putting the team first. This course covers strategies and techniques to help you become a more effective and valued member of your team. You'll explore ways to adopt a positive mindset and take a proactive role on a team, so that you can make a significant contribution. Because your success on a team depends on pulling together with other people, you'll also learn constructive ways to acknowledge differences and show respect for team members, and specific strategies for working collaboratively.	0.5
Relias Learning	730663	Difficult People: Strategies to Keep Everyone Working Together	While it's best to get personally fit for dealing with difficult people – that is, managing your own emotions and using self-management techniques, there are interpersonal strategies and skills you need when you engage and work with a difficult person. By learning how to focus on goals, give feedback, and manage conflict, you can work with difficult people more effectively.	0.5
Relias Learning	732254	Facing Confrontation in Customer Service	One of the most challenging and potentially uncomfortable responsibilities of a customer service person is dealing with angry customers. By following a few simple techniques, you can usually defuse tense situations without incident. In this course, you'll learn about typical trouble spots in dealing with angry customers and guidelines for avoiding or overcoming them. You'll also learn how to handle a customer complaint by defusing the tension, investigating the problem, and coming to an agreement on a solution.	0.5
Relias Learning	730672	Keeping Business Calls Professional	In business, one of the oldest communication tools is still among the most important – the telephone. It's crucial to create a positive impression, even when using the phone. In this course, you'll learn about some basic rules of etiquette to help you keep your business calls professional. You'll explore general best practices, and how to make and receive calls professionally. You'll also learn best practices for using a cell phone, and how to record and leave effective voicemail messages.	0.4
Relias Learning	732252	Rapport Building in Customer Service	Good customer service and strong customer relationships begin with building rapport. Building rapport requires knowing your customers, understanding their situations, and providing an empathetic ear for them to voice their concerns. In this course, you'll learn how to build rapport with customers by paying close attention to their needs, connecting with them, and being positive. You'll also learn how to empathize with customers by relating your own experiences, reflecting their emotions back to them, and normalizing their difficulties.	0.5
Relias Learning	412975	340b Drug Discount Program	To participate in the 340B Drug Program, eligible organizations and covered entities must register and be enrolled with the 340B program and comply with all program requirements. The main goal of this course is to provide information on the subtleties of the 340B program and how it can impact revenues at a Federally Qualified Health Center (FQHC) and FQHC Look-Alike programs. This course covers all of the nuances within the program, including duplicate discounting, patient definitions, and more. You also will learn how these issues can impact the fiscal performance of a Health Center. Using interactive exercises and case vignettes, you will learn how to apply your knowledge of these requirements in your own setting.	1.25
Relias Learning	737922	Acting Decisively	Acting decisively moves beyond simply making decisions. Decisive leaders exhibit confidence and are able to articulate the rationale behind their choices. This Challenge explores the qualities that embody decisiveness.	0.25
Relias Learning	730659	Acting with Diplomacy and Tact	People who communicate with diplomacy and tact are able to inspire confidence. In this course, you'll learn about developing diplomacy and tact, avoiding meltdowns and apologizing, developing empathy, and removing personal biases.	0.6
Relias Learning	562028	Conflict Resolution	Conflict in the workplace is inevitable because every person is different. However, handling it the right way leads to better relationships, an improved work environment, a stronger team, and personal goal achievement. This course presents techniques essential to handling conflict in the workplace.	0.5
Relias Learning	730623	Driving Change with Coaching	Coaching relationships are different from other working relationships. In this course, you'll learn about the enrollment, discovery, and action plan stages of coaching and techniques like questioning, listening, observing, and challenging.	0.6
Relias Learning	927381	Effective Communication: What Supervisors Need to Know	Communication is one of the most important variables in the art of leadership. Effective leaders are able to communicate their thoughts, ideas, and organizational plan in a manner conducive to success for all. Effective listening is equally as important; an asset many leaders fail to acknowledge or employ. This course prepares you to better work beside people and in situations on a professional level through effective communication.	1

Relias Learning	730661	Effective Team Communication	It's vital to maintain open, effective communication on a team. However, it's all too easy to adopt bad habits. Without realizing how badly it affects your team, you or another team member may communicate in ways that lead to misunderstandings, cause unnecessary conflict, keep others from having their say, and prevent the team from performing as well as it could. In this course, you'll learn about different verbal barriers to effective team communication and strategies for overcoming them. But speaking is only one part of communication; effective listening is vital too. So you'll also learn about specific active listening techniques that can help you be a better listener.	0.5
Relias Learning	494242	Facing the Management Challenges of Difficult Behavior and Diverse Teams	As a manager, you will inevitably encounter difficulties when dealing with your employees. Two areas you may experience this in is dealing with difficult behavior and managing diverse teams. Whether they are blatant or less obvious, behavioral problems need to be addressed before they affect morale and productivity. Likewise, it's important to consider the needs of all employees, no matter their backgrounds. This course covers best practices for confronting your employees about their difficult behavior and well as the key aspects of managing a diverse workforce effectively.	0.5
Relias Learning	730646	Handling Team Conflict	Successful teams are characterized by having a clear direction, trust among team members, effective communication, and the ability to quickly resolve conflict. The survival of a team depends on a team leader who can quickly recognize conflict, diagnose its cause, and use strategies to resolve the issue. In this course, you'll learn about what causes conflict on a team and the important role of healthy communication in handling conflict. You'll also learn about best practice approaches to resolving conflict and the tenets of principled negotiation. Finally, you'll learn guidelines for addressing one type of team conflict, lack of trust.	0.5
Relias Learning	494203	Managing Multigenerational Employees	Many influences have shaped the lives and work experiences of various generations, namely, Baby Boomers, Generation X, Millennials, and Generation Z. Because each generation has its own distinct attitudes, priorities, and work habits, managers can get the best from each generation by using strategies that recognize the differences. In this course, you'll learn about the best practices and successful techniques for managing these generational employees in the workplace.	0.5
Relias Learning	737889	Microsoft Excel 2016 Essentials: Charts, Tables, and Images	Using tables, charts, and images in Excel 2016, you can create attractive and well-organized representations of worksheet and workbook data. These elements can be easily inserted into your workbook and customized as necessary. In this course, you will learn how to effectively use and customize tables and charts in Excel 2016. You will also learn how to use headers and footers to add additional information to your work.	0.95
Relias Learning	737890	Microsoft Excel 2016 Essentials: Creating, Editing, and Saving Workbooks	Microsoft Excel 2016 makes it easy to create worksheets and workbooks, and to manage and manipulate data. In this course, you will learn how to cut, copy, and paste data; navigate between data cells and worksheets; and customize your Excel workspace. You will also learn about creating and opening workbooks, moving data around in Excel 2016, organizing worksheets, and saving and exporting data.	1.07
Relias Learning	737891	Microsoft Excel 2016 Essentials: Data Presentation Strategies	Microsoft Excel 2016 gives you many options for improving the presentation of your data. In this course, you will learn about adding visual impact to your data using Sparklines, linking to different locations using hyperlinks, and creating custom formatting rules. You will learn about the many tools Excel 2016 provides for visually enhancing the appearance of your data.	0.8
Relias Learning	737892	Microsoft Excel 2016 Essentials: Formatting Data	Making your data look good is easy in Microsoft Excel 2016. You can format numbers and text, and apply styles to make your data stand out. In this course, you will learn how to create custom formatting and styles, and copy formatting from cell to cell. In addition to formatting and styling data in Excel 2016, you will learn how to position the data in your spreadsheet.	0.9
Relias Learning	737893	Microsoft Excel 2016 Essentials: Formulas and Functions	Microsoft Excel 2016 allows you to perform complex calculations on your workbook data. Being able to use formulas to complete calculations not only simplifies your work but also helps to reduce the number of errors that can arise in such complex tasks. In this course, you will learn about the basic concepts and terminology associated with formulas and functions. You will learn about the various ways of referring to cells and cell ranges, and how to use basic functions including logical and IF-type functions.	1.13
Relias Learning	737894	Microsoft Excel 2016 Intermediate: Customizing Views, Styles, and Templates	Making the Microsoft Excel 2016 environment look exactly the way you want it to is easy. In this course, you will learn how to configure how you want a workbook and the work area itself to appear. You will also learn how to add and customize templates and styles to really make Excel 2016 work for you.	1.03
Relias Learning	737895	Microsoft Office 2016 Intermediate Excel: Creating Custom Visual Effects	A picture may paint a thousand words but Microsoft Excel 2016 makes adding both words and pictures to your workbooks very straightforward. In this course, you will learn how to insert and style text boxes, shapes, and SmartArt. You will also learn about applying and customizing themes and watermarks.	0.92
Relias Learning	737896	Microsoft Office 2016 Intermediate Excel: Macros and Advanced Queries	Using macros in Excel 2016 lets you save time when performing repetitive tasks. This course covers the options available when you are running macros, and also how to create your own custom macros. You will also learn about advanced functions that allow you to perform calculations using date and time, how to look up data, and how to perform advanced conditional queries.	1.18
Relias Learning	737897	Microsoft Office 2016 Intermediate Excel: PivotTables and Advanced Charts	In Microsoft Excel 2016, PivotTables and PivotCharts let you dynamically reorganize and display your data. They can summarize huge amounts of data by category without the need to input complex formulas or spend long hours manually reorganizing your spreadsheet. You can choose and change what you want to summarize. In this course, you will also learn how to use advanced chart features like trendlines and dual axis charts.	0.87
Relias Learning	737899	Microsoft Office 2016 Intermediate Excel: Working with Data	Microsoft Excel 2016 gives you a number of options for sorting and organizing data. In this course, you will learn about basic alphabetical and numerical sorts through color sorting and custom configured sorts. The course also covers grouping, filtering, searching, and ensuring valid data is entered.	1.08
Relias Learning	1185285	PCI Compliance Security Awareness Training Level I	Level I training provides employees with a solid understanding of how to properly protect credit card and personal information. This course also teaches a user about basic safe internet use.	1

Relias Learning	730729	Active Shooter 2.0	<p>Active shooter situations have become more common, in public places and at work premises. This course will help you prepare to respond to an active shooter situation. You'll learn about typical characteristics of active shooter incidents, ways you can prepare now, and expert recommendations on how best to react when an attack is in progress. You'll also learn what to expect and how to react when law enforcement arrives. This course was developed with subject matter provided by Eric L. Matson of Norsemen Training & Consulting Group, a global professional services company focusing on corporate, business and personal safety training. Please note, the course materials and content were current with the laws and regulations at the time of the last expert review, however, they may not reflect the most current legal developments. Nothing herein, or in the course materials, shall be construed as professional advice as to any particular situation with respect to compliance with legal statutes or requirements.</p>	0.2
-----------------	--------	--------------------	---	-----

Susquehanna Community Health & Dental Clinic, Inc.

Conflict of Interest Statement Policy

Policy Category: 19.0.02 Governance
Policy Owner: Compliance Officer
Origination Date: 07/26/2010
First Date Approved by Board of Directors: 07/26/2010

Purpose/Scope: This statement is directed not only to Board members and officers, but to all employees who can influence the actions of SCH&DC. For example, this its scope includes all who make purchasing decisions, all other persons who might be described as “management personnel,” and all who have proprietary information concerning SCH&DC.

The purpose of this policy is to protect the interest of Susquehanna Community Health and Dental Clinic, Inc. (the “Corporation”): (1) when the Corporation is contemplating entering into a transaction or arrangement that might benefit the private interest of a director, officer, member of a committee with board-delegated powers (hereinafter referred to as a “Committee Member”), or person with substantial influence over the affairs of the Corporation (including highly compensated and key employees) (hereinafter referred to as an “Influential Person”); or 2) when a director, officer, Committee Member, or Influential Person contemplates serving as a director, officer, member of a committee, employee or consultant of an organization which competes with the Corporation; or 3) when the Corporation is contemplating entering into a transaction or arrangement that might result in a possible excess benefit transaction.

The purpose of this policy is also to meet federal requirements and information required for Internal Revenue Service (“IRS”) reporting purposes. The Corporation is required to disclose in its annual IRS Form 990 Information regarding the independence of its governing body and certain relationships and transactions with respect to certain of its current and former directors, officers, Committee Members and Influential Persons. This policy is intended to supplement but not replace any applicable state laws governing conflicts of interest.

Policy Statement:

- I. Identification of a Conflict or Potential Conflict of Interest.
 1. A conflict or potential conflict of interest exists in:
 - a. Any transaction or arrangement between the Corporation and a director, officer, Committee Member or Influential Person;
 - b. Any transaction or arrangement under which the Corporation may actually or potentially compete with another entity: (1) for which a director, officer, Committee Member or Influential Person serves as a director, officer, member of a committee, employee or

Susquehanna Community Health & Dental Clinic, Inc.

consultant; or (2) to which a director, officer, Committee Member or Influential Person otherwise provides consulting services;

- c. Any transaction or arrangement between the Corporation and any entity or individual (1) in which or with which a director, officer, Committee Member or Influential Person is an officer or director or has a financial interest, or (2) in which or with which any director, officer, Committee Member, or Influential Person otherwise has any conflict of interest; and
- d. Any transaction or arrangement in which a director, officer, Committee Member or Influential Person otherwise has a financial interest.

A director, officer, Committee Member or Influential Person has a “financial interest” if such person, directly or indirectly, whether through business, investment or family has a present or potential ownership or investment interest or compensation arrangement in or with an entity or individual with which the Corporation has or may have a transaction or arrangement or has a compensation arrangement with the Corporation. Compensation includes direct and indirect remuneration as well as gifts and favors that are substantial in nature.

Any director, officer, Committee Member, or Influential Person who as a conflict or potential conflict of interest with respect to any transaction or arrangement is hereinafter referred to as an “interested person.”

If a director, officer, Committee Member, or Influential Person has a direct or indirect financial relationship with respect to any entity in the health care system of which the Corporation is a part, he or she is an interested person with respect to all entities in the system.

II. Conflict of Interest Procedures for Officers, Directors, and Committee Members

1. Disclosure of Conflict or Potential Conflict of Interest.

In connection with any transaction or arrangement presented or to be presented to the Board of Directors of the Corporation (or committee thereof) or to the Corporation’s member(s) or management, as applicable, each interested person is required to make a prompt, full and frank disclosure of the material facts relating to the conflict or potential conflict to the Board of Directors (or committee) or the member(s), as applicable (see sample disclosure form attached hereto as Attachment “A”).

2. Determination of Conflict of Interest.

After disclosure of the conflict or potential conflict and all material facts and after any discussion with the interested person, it shall be the obligation of management, or the Board of Directors (or committee) or the member(s), as applicable, without the participation of the interested person and outside such person’s presence, to make a determination whether a conflict of interest exists.

Susquehanna Community Health & Dental Clinic, Inc.

3. Interested Person's Participation.

After a determination is made that a conflict exists, an interested person may make a presentation regarding the transaction or arrangement to management, at the Board or committee meeting where the transaction or arrangement is being considered, but after such presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement that results in the conflict of interest. The interested person shall not vote on and shall not use any personal influence with respect to the vote on such transaction or arrangement.

4. Action on the Transaction or Arrangement.

After exercising due diligence, management, or the Board or committee, as appropriate, shall determine whether the Corporation can obtain a more advantageous transaction or arrangement with reasonable efforts from a person or entity that would not give rise to a conflict of interest. The decision to enter into a transaction or arrangement involving an interested person requires at a minimum a majority vote of the non-interested directors (or committee members) present or the member(s), as applicable. Those directors (or committee members) or member(s), as applicable, may approve the transaction or arrangement only after making the determination that (a) the Corporation could not have obtained a more advantageous rise to a conflict of interest and (b) the transaction or arrangement is in the Corporation's best interest and for the Corporation's benefit and is fair and reasonable to the Corporation. The non-interested directors (or committee members) or member(s), if applicable, may if appropriate appoint a non-interested person or committee to investigate alternatives to the proposed transaction or arrangement.

5. Minutes.

The minutes of the board (or committee) meeting or meeting of the member~~s~~~~(s)~~ shall include the name of the person who disclosed a conflict or potential conflict of interest or was otherwise found to have a financial interest in connection with a conflict or possible conflict of interest, a description of the actions taken to evaluate whether there was a conflict of interest, the nature of the conflict and underlying financial interest and whether the board (or committee) or member(s), as applicable determined that there was a conflict of interest. In addition, the minutes shall identify those persons who were present for discussions and votes relating to the transaction or arrangement, shall summarize the contents of these discussions, including any alternatives to the proposed transaction or arrangement which were discussed, and shall record the vote.

III. Conflict of Interest Procedures for Influential Persons

1. Influential Persons of the Corporation may not enter into an arrangement or transaction with an outside party, either directly or indirectly, that will result in personal benefit to such Influential Person at the expense of Corporation, without the knowledge and consent of Corporation.
2. An Influential Person of the Corporation who is involved, or intends to become involved, in any business or organization that conducts business

Susquehanna Community Health & Dental Clinic, Inc.

with, or is in direct competition with the Corporation shall disclose such interest to the Corporation and shall not participate in any decisions concerning transactions with such business or organization. If during the regular course of business a conflict of interest arises between the role of the Influential Person as an employee of Corporation and the role of the Influential Person with respect to another business or organization, the conflict shall be immediately disclosed to Corporation, and the Influential Person shall not take any action which might compromise the interests of Corporation.

3. It shall be the obligation of the President of the Corporation, or his/her designee, in consultation with the legal counsel, to make a determination whether a conflict of interest exists.
4. Individuals who violate this policy are among other things, subject to disciplinary action, including loss of employment.

IV. Additional Conflict of Interest and Disclosure Provisions

1. Violations of the Conflicts of Interest Policy.
 - a. If management, or the Board (or committee) or member(s), as applicable, has reasonable cause to believe that a person has failed to disclose an actual or possible conflict of interest, it shall inform the person of the basis for such belief and afford the person an opportunity to explain the alleged failure to disclose.
 - b. If, after hearing the response of the person and making such further investigation as may be warranted in the circumstances, management or the Board (or committee), as applicable, determines that the person has in fact failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.
2. Compensation.
 - a. A voting member of the governing board who receives compensation, directly or indirectly, from the Corporation for services is precluded from voting on matters pertaining to that member's compensation.
 - b. A voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Corporation for services is precluded from voting on matters pertaining to that member's compensation.
 - c. No voting member of the governing board or any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Corporation, either individually or collectively, is prohibited from providing information to the governing board or any committee regarding compensation.
 - d. Physicians who receive compensation, directly, or indirectly, from the Corporation, whether as employees or independent contractors, are precluded from membership on any committee whose jurisdiction includes compensation matters; provided, however,

Susquehanna Community Health & Dental Clinic, Inc.

that no physician, either individually or collectively, is prohibited from providing information to any committee regarding physician compensation.

3. Annual Disclosure Statements

- a. The Corporation shall review this policy annually and prepare a list of persons to whom an annual Disclosure Statement should be distributed. The Corporation shall maintain such list and record mailing dates related to such list.
- b. Each current officer, director, Committee Member and Influential Person shall annually complete a Disclosure Statement in the form attached as Attachment "A".
- c. The Corporation shall make a reasonable effort annually to have any person who during the past five (5) years was an officer, director or Influential Person of the Corporation and received compensation in the calendar year ending with or within the Corporation's current tax year to complete a Disclosure Statement in the for attached as Attachment "B".
- d. The Board will review a summary of all the Disclosure Statements at least annually.

4. Periodic Review.

To ensure that the Corporation operates in a manner consistent with its charitable purposes and that it does not engage in activities that could jeopardize its status as an organization exempt from federal income tax, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

- a. Whether compensation arrangements and benefits are reasonable based on the competent survey information and are the result of arm's-length bargaining;
- b. Whether acquisition or physician practices and other provider services result in inurement, impermissible private benefit, or in an excess benefit transaction;
- c. Whether partnership and joint venture arrangements and arrangements with management organizations and physician hospital organizations conform to SCH&DC's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement, impermissible private benefit, or in an excess benefit transaction; and
- d. Whether agreements to provide health care and arrangements with other health care providers, employees and third party payors further the Corporation's charitable purposes and do not result in inurement, impermissible private benefit, or in an excess benefit transaction.

In conducting periodic reviews, the Corporation may, but need not, use outside advisors. If outside experts are used, their use shall not relieve

Susquehanna Community Health & Dental Clinic, Inc.

the board of its responsibilities for ensuring that periodic reviews are conducted.

Review/Revision Log:

Approved by Board of Directors: 8/27/2012, 6/24/2013, 10/21/2013, 05/21/2018

Reviewed/Revised: 8/27/2012, 5/20/2013, 10/11/2013, 01/19/2015, 05/10/2018, 01/25/2021, 01/11/2022

Signatures:

Kimberly Wetherhold, Board Chair

James Yoxtheimer, President & CEO

Date:

SUSQUEHANNA COMMUNITY HEALTH & DENTAL CLINIC, INC.

Standards of Conduct

Policy Category: 19.0.03 Governance
Policy Owner: Compliance Officer
Origination Date: 04/21/2016
First Date Approved by Board of Directors: 04/21/2016

I STATEMENT OF PURPOSE

The Susquehanna Community Health and Dental Clinic, Inc. d/b/a River Valley Health and Dental Center ("RVH&DC") is organized and operated exclusively for charitable purposes under the Pennsylvania Nonprofit Corporations Law and within the meaning of Section 501(c)(3) of the Internal Revenue Code ("Code") as amended.

To carry out its mission, it is essential that the RVH&DC, its Board members, directors, officers, and all employees (including agents, contractors, and business associates) conduct themselves and the business affairs of the organization with honesty, integrity, and high ethical standards and in compliance with all applicable laws and regulations in furtherance of, and consistent with, the best interest of RVH&DC patients and the community that it serves.

To promote and ensure appropriate conduct, the primary purpose of the Standards of Conduct is to safeguard our commitment and govern our conduct when making decisions which may affect our resolve. These Standards of Conduct are intended to be consistent with RVH&DC's Bylaws, applicable Federal, State, and Local laws and regulations and existing RVH&DC policies which are incorporated herein for all purposes.

II SCOPE AND RESPONSIBILITY

These Standards of Conduct apply to directors, officers, employees, consultants, and any other parties (agents, business associates, volunteers, etc.) engaged in activities or otherwise involved in furtherance of the interest of ~~the~~ RVH&DC, its mission or service to its patients and its community. Each is responsible for acting in a manner consistent with the Standards, with RVH&DC policies and procedures, and with generally accepted standards of professionalism, courtesy, and respect. Each is accountable for leadership to build and support the RVH&DC culture that fosters a safe workplace, values diversity, encourages communication, and respects ethical behavior.

III STANDARDS

a. Standard for Managing Conflicts of Interest

1. In order to ensure fair and objective decisions are made in the best interest of RVH&DC, all Directors, Officers, and Board members are expected to comply with the provisions of the RVH&DC Conflict of Interest Policy and with the DHHS regulations found at 45CFR Subsection 74.42, such policy and regulation being hereby incorporated herein for all purposes.

b. Standards for Managing Confidentiality of Information

1. Safeguards for the use and protection of proprietary business information, confidential or other protected information (such as Protected Health Information ["PHI"] as defined by 45 C.F.R. § 160.10) and prohibitions regarding the disclosure of such

SUSQUEHANNA COMMUNITY HEALTH & DENTAL CLINIC, INC.

information are set forth in the RVH&DC's Confidentiality Policy and its related HIPAA Policy, hereby incorporated herein for all purposes.

c. Standards for Gifts/Gratuities

1. Prohibition

a. No Director, Board Member, or Officer may solicit or accept gifts, gratuities, favors, or anything of value, other than promotional materials of little or nominal value such as pens, calendars, mugs, and other items intended for wide distribution and not easily resold.

d. Procurement Standards

1. It is the policy of RVH&DC to conduct all procurement transactions in a manner to provide, to the maximum extent practical, open, and free competition. Awards, contracts, etc. will be made to the bidder who is most responsive to the requisition or solicitation and most advantageous to RVH&DC in terms of price, quality, and other factors. RVH&DC retains the right to reject any and all bids or offers when it is in its interest to do so.

e. Standards for Political Activities and Lobbying

1. Political Activities

a. Directors, Board members or officers may not use RVH&DC's name, facility, or any resources in connection with political campaign activities, nor may they engage in conduct that indicates that RVH&DC supports any political party or candidate.

2. Lobbying

a. No Federal grant or related funds may be used to support the cost of lobbying activities as defined variously in OMB Circular A-122, DHHS rules implementing the Byrd Amendment and DHHS appropriations riders.

f. Standards for Compliance with Laws, Regulations, etc.

1. Each person under this standard is expected to be familiar with the laws and regulations that apply to RVH&DC's business operations. RVH&DC's Compliance Plan and Policy sets forth the standards to prevent, detect, and correct violations of law and Company policies and procedures which are hereby incorporated herein for all purposes, including the appointment of a compliance officer, who will be also responsible to ensure adherence to the Standards of Conduct as set forth herein.

2. Prohibition of Harassment

It is the policy of RVH&DC that all persons herein are to be guided by the highest ethical and professional standards and expected to behave with integrity and respect towards all that they come in contact with. Harassment is an improper or unwelcome conduct that might reasonably be expected or perceived to cause offense or humiliation to another person. Harassment in any form is prohibited and will not be tolerated. Sexual harassment is a specific type of prohibited conduct that is of a sexual nature. The proscription of this conduct in this Standard supplements and does not affect the application of other policies, regulations, rules, and laws applicable to this conduct.

3. Diversity & Inclusion

RVH&DC is an equal opportunity employer, and we aim to create a safe, respectful, and inclusive place of work for the betterment, health, and welfare of our community and workforce. We encourage and model that behavior and accountability to reinforce respect of all at all levels of our organization. This commitment to diversity and inclusion applies to all interactions in our shared professional encounters, including daily operations, shared

SUSQUEHANNA COMMUNITY HEALTH & DENTAL CLINIC, INC.

online actions, and other events where each may represent RVH&DC. We denounce exclusionary behaviors, which may include incivility, bullying, and workplace violence, discrimination, and isolation of individuals and/or groups who are perceived as different while encouraging inclusive behaviors that would promote diversity.

IV Violations and Reporting Violations

1. All suspected or known violations of the Standards of Conduct should be reported promptly through regular reporting channels or directly to the Ethics/Compliance Officer, Karla Sexton at 570-567-5413. No reprisals or retaliation will be permitted against anyone for reporting in good faith a suspected or known violation. To the extent possible and if requested, the confidentiality of the source will be protected.

2. Violations by employees, etc. are subject to disciplinary action up to and including discharge pursuant to the RVH&DC's Disciplinary Action Policy, incorporated herein for all purposes. Directors, Board members, and Officers who violate these standards may, depending on the severity of the violations, be subject to admonishment or removal from the Board, in addition to legal penalties that may apply.

REVIEWED: 05/10/201; 01/11/2021, 01/11/2022

REVISED: 01/25/2021

Signatures:

Kimberly Wetherhold, Board Chair

James Yoxtheimer, President & CEO

Date: