

Orientation Essentials

Required Training Sign Off
2023



Compliance

Compliance Committee & Officer

All Gillette employees should report any compliance concerns or questions to any of the following:

- Compliance Officer Susanna Braun at 651-325-2334
- Your manager
- The Compliance Hotline at 1-844-569-1395
(Concerns may be reported anonymously. Retaliation is prohibited when you report concerns in good faith.)

	Compliance Office Contact if you have a compliance concern or question
	Office of Compliance and Regulatory Affairs Staff monitors, audits, and performs risk assessments to assure we meet the regulation/laws and follow our own policies and procedures
	Compliance Committee Committee oversees compliance activities at Gillette
	Education Facility-wide and department-specific training provided

What is the Compliance Program?

The purpose of the compliance program is to mitigate risks to the organization, identify waste and errors, prevent fraud and abuse, and save the precious health care resources that patients need.

Federal Fraud and Abuse Laws

- **False Claims Act:** Prohibits any person from knowingly or deliberately presenting or causing a fraudulent claim for payment.
 - Example: Billing for an item not provided.
 - If fraud or abuse is discovered, it can result in civil and monetary penalties and exclusion of the organization or provider from the Medicare and Medicaid programs.
 - Whistleblowers who report fraud or abuse are protected against retaliation.
- **Anti-kickback Laws:** Makes it a crime to knowingly and willfully offer, pay, solicit or receive anything of value to induce or reward referral of items or services reimbursable by a federal health care program (e.g. Medicare or Medicaid).
 - Example: Receiving a gift of significant value in exchange for services.
- **Stark law:** Prohibits physicians from referring Medicare patients to an entity with which they or their immediate family has a financial relationship.
- **Deficit Reduction Act:** Gives Medicare and Medicaid ability to detect and reduce fraud, waste and abuse in the Medicaid program. Requires healthcare organizations to educate all staff on fraud and abuse laws.

Information Protection

Health Insurance Portability & Accountability Act

- To provide health care continuity, ensure greater accountability and simplify administrative functions within the health care industry.



Protected Health Information (PHI)

- ANY info that identifies a specific person and relates that person's physical or mental health, health care or health care payment.
- Examples (not an exhaustive list):
 - Name, address, phone number, birth or visit dates
 - Social Security number, medical record number
 - Identifying photos
 - Billing or other account numbers
- Federal law that imposes several requirements related to health insurance and health records
 - *Yes, training employees is one of the requirements!*
- **Key Points:**
 - Privacy of health information must be maintained
 - Access to PHI limited to those involved in TPO (Treatment, Payment, or Operations)
 - There are penalties for violations of this law
 - *Employees can be held personally liable for HIPAA violations*

Sharing Health Information

- In most situations, a patient must complete and sign an *Authorization to Release Information* (Gillette form 8083-003) before we can disclose patient information.
- However, an authorization is not needed to share information related to:
 - Treatment
 - Payment
 - Health-care Operations
- ENSURE CONFIDENTIALITY of PHI to which you have access
- MINIMIZE OPPORTUNITIES for PHI to be seen or overheard – be aware of your surroundings!
- LOG OFF your workstation when finished
- ANY work – even errors – done by ANYONE under your logon ID is YOUR responsibility (or your error!)
- USE SECURE SHREDDER bins for disposing paper and other media (including CDs and disks) that contain PHI

Patients have the right to:

- Right to an Accounting of Disclosure
 - Patients can view who has reviewed their health information
- Right to be notified of our privacy practices
- Right to access and request changes to their medical record
- Right to request that their medical record be restricted
- Right to file a complaint

Electronic Information Security

Everyone is responsible for protecting patient and organizational data. Gillette computer users should:

- Never disable or modify anti-virus or scanning processes.
- Never open attachments on e-mail messages you weren't expecting to receive, even if you know the author of the message.
- Click on only those links you know to be trustworthy. If you have even the slightest doubt about a link, don't use it. Instead, manually navigate to the site you're seeking.
- Do not share your password or any authorizing credential. *You are responsible for all actions performed under your credentials.*
- Create a unique and complex password
- Use only your own username and password to log on to a Gillette system
- NEVER store PHI on laptops/desktops/or on USB drives.
- Report lost or stolen laptops to Help Desk. IS maintains a locator system that can find missing laptops.



Social Media Policy

- Ask for consent when taking a specific person's photo, before posting anywhere.
- DO NOT talk about a patient on social media, even if no names are mentioned. (Descriptive status or comments can still identify a patient.)
- There is a time and place for social media!



HIPAA Email Security



- When electronic PHI (e-PHI) is sent to another Gillette e-mail address, it stays on our internal network, which is protected from public access.
- When e-PHI is e-mailed to a recipient outside Gillette, it is not protected from public access.
- To send secure data to Gillette employees from a remote location, use the URL <https://webaccess.gillettechildrens.com>. This channel should be used for internal Gillette email only: it does not send secure e-mail to locations outside Gillette.
- Emails sent to locations outside of Gillette should be encrypted: [https://gillettechildrens.sharepoint.com/sites/InformationSystems/Shared%20Documents/Outlook Encrypted E-mail.pdf](https://gillettechildrens.sharepoint.com/sites/InformationSystems/Shared%20Documents/Outlook%20Encrypted%20E-mail.pdf)
- If a patient sent email to you containing PHI, remember to delete the previous email sent from the patient when replying and sending a new message.

Safety and Security

Public Address Codes and Alerts

The following codes may be called over the public address system:

- **Fire Alarm**
- **Tornado Warning**
- **Bomb Threat**
- **Mass Casualty** – large-scale disaster
- **Code Blue** – cardiac or respiratory distress
- **Missing Child**
- **Active Security Threat** – internal security event
- **Active Shooter**
 - Visit ‘In Case of Emergency’ Section on GilletteNet for more information regarding response policies.



Fire Safety

Use the R.A.C.E. Protocol:

- **Rescue** anyone in immediate danger
- **Alert** by pulling the nearest manual fire station
 - At the 200 site dial extension 3969 to inform security
 - Off-campus locations dial 911
- **Contain** the fire by closing doors and windows
 - Turn on all lights in area
- **Evacuate/Extinguish** the fire only if safe to do so

P.A.S.S. for fire extinguisher use:

- **Pull**—pull the pin
- **Aim**—aim at the base of the fire where the fuel source is located
- **Squeeze**—squeeze the lever above the handle and release to stop the flow
- **Sweep**—sweep from side to side

Security Events

- Dial 3969 at the St. Paul Campus--Regions Hospital Security is responsible for the security of employees, visitors, buildings, grounds and property of Gillette's St. Paul campus.
- Dial 911 for all other locations--All Gillette facilities are secured before and after hours by a security or alarm company

Hazardous Materials: Employee Right to Know

- Federal and state governments created “right to know” laws that require employers to tell employees about any hazardous materials they might encounter in the workplace.
- The “right to know” hotline number is listed on a red sticker in the handset cradle of all Gillette phones.
- Safety Data Sheets (SDSs) provide information about the physical and chemical properties of a substance and about any health risks associated with using the substance.

Make sure you are using personal protective equipment (PPE) to prevent exposure to dangerous substances.

PPE includes: *Gloves* *Gowns* *Safety goggles* *Respiratory masks* *Earplugs*
Lead shields *Engineering controls (ventilation hoods, vacuum systems, and needleless IV systems)*

Abuse & Neglect

Suspect abuse when children incur injuries that they or their caregivers can't reasonably explain.

- Review Child Abuse or Neglect Reporting (PC78), in the Administrative Policy Manual or on GilletteNet.
- If you have questions, contact Child and Family Services or your clinical educator. The number for CFS is 651-229-3855.

Indicators of physical abuse:

- Bruises, welts and burns
- Fractures and swelling
- Missing teeth
- Multiple and repeated injuries
- A diagnosis of shaken baby syndrome
- Delays in requesting treatment
- Inconsistent explanations for injuries
- Explanations that don't adequately account for injuries
- Caregivers who hesitate to provide information or permit diagnostic tests

Indicators of neglect:

- Dehydration and/or malnutrition
- Inadequate weight gain with no known medical cause
- Poor hygiene and personal care
- Clothing that's inappropriate for the season
- Frequently missing medical appointments
- Frequently being absent from school
- Instances in which the child begs, steals money or steals food
- Exposing the child to avoidable safety risk

Indicators of sexual abuse:

- Unexplained abdominal pain
- Vaginal or urethral discharge
- Pain upon defecation
- Anal fissures
- Reddening or bruising in the genital area
- Torn, stained or bloody underclothing
- Pain or itching in the genital area

When a child has been abused or neglected, or is at risk for abuse or neglect, we must take action. Even if we only suspect abuse or neglect, we're legally, ethically and clinically obligated to intervene.

By law (Minnesota statute 626.556) all professional staff at Gillette are mandated to report abuse or neglect. At Gillette we expect all staff that suspect or know of abuse or neglect to respond to the situation for the safety of the patient.

- Any Gillette staff can respond by contacting Social Work. Supervisors or managers can assist as needed.
- Report your knowledge or suspicions immediately, but at least within 24 hours (including evenings, weekends and holidays) or becoming aware of the situation.
- In addition, contact a Gillette social worker or social work on-call (evenings, nights, weekends and holidays) on pager 612-534-4238.
- A Gillette social worker will help you file your report. Contact must be made with Child Protection Intake Screening in the county where the child resides.

Should I inform the parent or caregiver of the report?

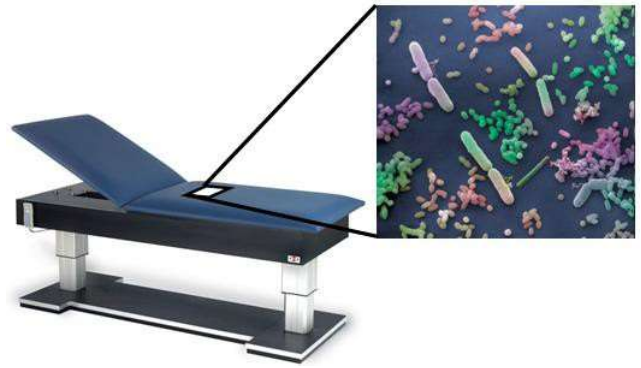
- Use clinical discretion.
- DON'T inform the parent of the report if informing the parent could endanger the child.
- DON'T inform the parent of the report if you suspect that the caregiver may be charged with criminal activities.
- Should you decide to inform the parent, do so AFTER you make the report.

Infection Prevention

Transmission of infections in a healthcare setting requires at least three elements:

- A source of infecting microorganism
- A means of transmission for bacteria and viruses
- A susceptible host

Hand hygiene and environmental cleaning in healthcare settings are important infection prevention measures within each element of the Chain of Infection.



Hand hygiene is a two-step process:

Step One: Cleaning antiseptis (washing hands or waterless hand rub)

- Before and after contact with
 - patients
 - blood or body fluids
 - any potential reservoir
- Before and after eating
- After using the bathroom
- After taking gloves off

Step Two: Moisturizing






Cleaning

- Use hospital disinfectants
 - Quaternary Ammonium (Virex, Sani-cloths)
- Disinfect frequently touched surfaces and equipment with surface wipes
 - When soiled
 - At regular intervals
 - Disinfect equipment between each patient use



Isolating

- Obtain a culture whenever possible to determine the agent and antibiotic that is effective.
- Understand microbiology of agent (where found, what infections and diseases they cause, and how they are transmitted).
- Proactively implement appropriate isolation practices while waiting for results.
- Look at the patient presentation, their history, in addition to the microbiology result.

STANDARD PRECAUTIONS FOR INFECTION CONTROL	
<i>Universal Precautions, Universal Body Substance Isolation, Universal Blood and Body Substance Technique</i>	
	Handwashing Wash hands before and after patient contact and after removing gloves.
	Gloves Wear when hands are likely to be exposed to blood, body fluids, nonintact skin, mucous membranes, or contaminated articles. Change gloves between tasks on the same patient.
	Gown Wear a fluid-resistant gown when clothing is likely to be exposed to blood or body fluids.
	Mask, Eye Protection, Face Shield Wear to protect eyes, nose, and mouth during activities that may result in splashing of blood or body fluids.
	Sharps Do not recap needles or refer to Infection Control for safe alternatives. Dispose of sharps in appropriate containers.

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COVID-19

Gillette strives to keep patients, families, and employees as healthy and safe as possible. Please adhere to the following best practices to prevent the spread of Covid-19:

- Don't come to work if you are sick. If you have symptoms of Covid-19, please call the Employee Health Line (651-254-2255).
- Follow all personal protective equipment (PPE) guidelines. Masks are required when:
 - A patient has an isolation precaution status or clinical presentation. Follow posted signage.
 - You have upper respiratory symptoms such as a cough, congestion or runny nose.
 - A patient, parent or legal guardian requests that their care team wear a mask. Signs will be posted on the patient's door to communicate their wishes.
 - Instructed by Employee Health when returning to work after illness.
- Anyone may choose to wear a mask
- Practice frequent hand hygiene
- Disinfect surfaces with wipes often
- Do not touch your eyes, mask, or exposed face

Please direct questions or concerns to your supervisor, or infectionprevention@gillettechildrens.com.

Pain Management

The following are guiding principles in pain management practices that Gillette employees and contracted staff will use:

- Comprehensive pain management to aid in healing and recovery.
- Optimal clinical skills to help patients avoid experiencing pain whenever possible (e.g., staff members will anticipate situations where patients are likely to experience pain and take appropriate steps to minimize pain).
- Pain assessment methods that are appropriate to an individual's age and abilities (e.g., staff members are responsible for anticipating pain and for being alert to indicators of pain in patients who are non-verbal / who have impaired communication).
- Philosophy that pain reported by patients and/or their caregivers is "real" and appropriate pain management interventions will be taken.
- Collaboration and education techniques when including patients and/or their caregivers in pain management activities.

Gillette uses a 0-10 pain scale: MILD 1-3, MODERATE 4-6 SEVERE 7-10

Gillette uses a variety of Pain Intensity Tools including:

- Faces scale: For children, aged 4 and older, who are able to communicate verbally. This tool is used for self-reported assessment of pain intensity.
- The Numeric Rating Scale For patients, aged 7 and older, who are able to communicate verbally. This tool is used for self-reported assessment of pain intensity. Patients rate their pain from 0 to 10. "If 0 is no pain and 10 is the worst possible pain, how much pain do you have now?"
- The Verbal Descriptive Scale Patients use words instead of numbers to rate their pain. This tool is used for self-reported assessment of pain intensity. Ask the patient: "Tell me how much pain you have now: none, mild, moderate, severe, very severe, or worst possible pain." These 6 choices correspond with the Numeric Scale options.
- If the patient is unable to provide self-report, or if staff want to add an additional assessment, an observational tool should be used.

A comprehensive list of integrative modalities available in various inpatient and outpatient settings can be found [here](#). See also Policy PC90 on Comprehensive Pain Management. For information on prescribing opioids and managing complex pain, [please visit the Pain GilletteNet page](#) upon your arrival at Gillette.

Diversity, Equity, and Inclusion

Gillette values diversity and strives for inclusive teams and culturally-competent care. We implement practices to attract, and retain diverse talent, develop employee cultural competence, and give leaders the understanding and tools to create an inclusive environment on their teams. As part of Gillette’s pledge for equity, we are working to eliminate health care disparities for racially, ethnically and culturally diverse individuals. These efforts are part of a long-term Diversity, Equity, and Inclusion plan that includes work from Administration, Diversity Equity, and Inclusion Committee, HR, and Education & Development.

Organizational Goals

Review Diversity Commitment on the Diversity, Equity, and Inclusion GilletteNet page upon your arrival.

- Create a welcoming, inclusive, and anti-racist environment for patients, families, and staff
- Recruit and retain a diverse workforce
- Improve quality of care and reduce health disparities in our patient population
- Strengthen relationships with our community

Details about our commitment to diversity, equity, and inclusion are outlined in policy A47: Cultural Competency and Diversity.

Employee expectations are covered in a number of policies and training:

- Non-discrimination, policy PC07
- Patient’s Rights, policy A07
- Professional Conduct, policy A44
- Interpretation Services, policy PC88
- Equal Employment Opportunity and Affirmative Action, policy HR-E06
- Annual training and education curriculum for staff related to diversity



Gillette: Act First From Love

Working at Gillette means sharing a vision: of making life better for our patients, their families and our co-workers! Together we strive to improve service and exceed expectations.

Gillette employees show they care for Gillette patients and families and their colleagues by beginning every encounter with compassion, generosity, and an open heart and mind.

These behaviors embody the value of **Act First From Love**:

- I actively model and encourage cooperation within my own team and across Gillette to demonstrate that we are all in this together.
- I strive to work effectively with others by appreciating their perspective, background, style, etc.
- I work to make others feel valued.
- I am trusted by others because I represent and protect their interests.



**ACT FIRST
FROM LOVE**

Dress Code Policy

Policy Statement:

Gillette Children's has an expectation of all employees, volunteers, interns, students, and contracted staff to present an image to help patients, families, guests, and employees feel safe, confident, and comfortable.

Minimum Expectation

1. Must wear Gillette-issued identification badges while at work above waist level and in a clearly visible location. Must not be defaced with stickers or other devices.
2. Must exercise good personnel hygiene, be well groomed, and present a professional, clean and neat appearance when working.
3. Clothing that is prohibited:
 - a) Tops or pants that show any portion of an employee's undergarments, midriff, hips, buttocks, breasts, or excessive cleavage
 - b) Blue or faded denim jeans or sweatpants
 - c) Clothing or items with promotional writing or ads that is visible, with the exception of Gillette logo items
 - d) Spaghetti strap, backless, or halter tops
 - e) Hoodies
 - f) Shorts of any kind
 - g) Flip flops
 - h) Leggings worn as pants (not under a skirt)
 - i) Any clothing that is torn, stained, dirty, ill-fitting
4. Body Piercings: May only wear visible piercings in their ears. All others are prohibited, including tongue piercings.
5. Tattoos: Should be covered as much as possible.
6. Fragrance: Gillette strives to maintain a fragrance-free environment. Any fragrances including scented deodorant, lotion, perfumes, etc. are prohibited and should not be worn while at work.
7. Shoes and Stockings: Footwear must be adequate and safe and be appropriate for department's needs. Shoes must look professional, clean, and in good repair. Personnel providers that work directly towards patient are expected to wear socks and stockings. Managers will define further standards.
8. Hair: Should be clean and well-groomed. Extreme or loud hair colors are discouraged (i.e., purple, blue, etc.).
9. Artificial Nails: Are prohibited from being worn by employees who provide direct care.
10. When presenting Gillette outside of organization or when attending an educational program, professional attire as outlined in this policy is expected when Gillette is paying fees or providing over time.
11. Exceptions may be made through this policy through HR.





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Acknowledgements

In accordance with hospital rules and regulations, employees must attest to their understanding of specific legal, safety, security, compliance, information protection, infection prevention, and occurrence reporting information.

Signing indicates you have read and understand the information in this packet as well as the regulations related to the covered topics. You will be sent an electronic version of this packet once a signed copy is received.

Signatures

Signature

Date

Gillette Representative Signature

Date

Covered Topics:			
Regulatory Compliance	Abuse & Neglect	Revenue Cycle	Customer Service
Information Protection	Infection Prevention	Dress Code	Values
Safety & Security	HIPAA	Diversity & Cultural Competence	Pain Management