



CLINICAL STUDENT HANDBOOK

2023

**HCC Network
819 S. Business Hwy 13
Lexington, MO 64067**

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We, at HCC Network, are confident that you will find our organization a dynamic and rewarding place and we look forward to a productive and successful association. We consider the employees of HCC Network and therefore, students, to be one of its most valuable resources. This handbook has been written to serve as the guide for student/staff relationships.

Several things to keep in mind about this handbook; first, it contains only general information and guidelines. It is not intended to be comprehensive or to address all the possible applications of, or exceptions to, the general policies and procedures described. For that reason, if you have any questions concerning eligibility for a particular benefit or the applicability of a policy or practice to you, you should address your specific questions with the Program Director. Neither this handbook nor any other organization document confers any contractual right; either expressed or implied, to remain in the organization's employ or membership in a cohort. Nor does it guarantee any fixed terms and conditions of your place in the program.

This handbook and its policies are not intended and should not be construed to interfere, limit, or prevent an employee or student from exercising any of their rights under the National Labor Relations Act (NLRA) or other applicable law.

The procedures, practices, policies, and benefits described here may be modified or discontinued at any time. We will try to inform you of any changes as they occur.

This handbook and the information in it should be treated as confidential. No portion of this handbook should be disclosed to others, except HCC Network employees and others affiliated with HCC Network, whose knowledge of the information is required in the normal course of business.

Subjects described in this handbook are covered in detail in official policy documents. Refer to these documents for specific information because the handbook only briefly summarizes those guidelines and benefits. Please note that the terms of written policies are subject to override any statements made in this or other documents.

HCC NETWORK MISSION AND VISION

Mission

Cultivate partnerships and deliver quality health care to strengthen rural communities. In order to accomplish this mission, the Board of HCC Network has empowered the leadership and staff, to implement its policies. HCC Network strives to develop partnerships with students, organizations, and the community to train students to offer career opportunities and economic development in rural areas to provide quality health care.

Vision

Rural communities free of barriers to live life well. Rural communities thrive with economic development and opportunities for career paths to allow students to learn, grow, and enter the workforce to provide a healthy life for themselves and others.

Values

During the development and incorporation of HCC Network and through extensive community outreach, HCC Network identified six value statements that represent the ideals the Dental Assisting Training Program will embody in its next chapter and beyond.

- **Honesty** – It is an expectation of the organization to conduct business operations transparently, ethically, and in ways that honor the trust placed in us by our students, employees, and communities we serve.
- **Excellence in Service** - We deliver our very best as an employer, community partner, educator, and workforce training provider for all West Central Missouri.
- **Accountability** - Our institutional infrastructure fosters equity and responsibility in employment and student learning and eliminates barriers to success for anyone.
- **Leadership** - People serve as the cornerstone of what we do and why we do it. We invest in employee development, intentionally recruit, and retain a workforce that represents the communities we serve and embrace individuals of all walks of life as valued members of the HCC Network.
- **Transparency** - We conduct ourselves with integrity, ethically, and in ways that honor the trust placed in us by our students, employees, and communities we serve.
- **High Performance** - We promote personal, professional, and lifelong learning opportunities to garner excellence that positively impact lives and shape the rural workforce.

Student Policies

Student Conduct

It is expected that students and others will conduct themselves in a manner which enhances the care, services, collaborative partners, and the image of the overall organization. All individuals will be treated with dignity and respect. Examples of expected behaviors include, but not limited to:

- Regular and punctual attendance
- Courteous interactions with members, patients, customers, co-workers, clients, and visitors
- Quiet and orderly conduct
- Conscientious attention to duty
- Delivery of quality care and services
- Performance which reflects attention to the needs of our members and support the facility and mission.

For the protection and well-being of clients, as well as visitors, students and employees, certain behaviors cannot be tolerated. Examples of behaviors, but not limited to, which are unacceptable and will not be tolerated include:

- Dishonesty
- Use or possessing of illegal or intoxicating substances while on facility premises or being under the influence of such substances while on facility premises.
- Refusal to perform assigned duties.
- Breach of confidentiality
- Falsification of any organization records or documents
- Abuse or neglect of members
- Threatening or intimidating members, visitors, co-workers or others including inappropriate behavior as defined in the Workplace Bullying Policy
- Violation of Safety standards
- Sexual and other forms of harassment
- Unlawful possession of firearms and/or weapons of any kind in the workplace, in organization vehicles or while on HCC business
- Carelessness
- Failure to perform to job and/or facility standards.
- Willful misconduct
- Absence without notice, or absence that is unexcused.
- Failure to comply with dress and/or hygiene/grooming standards.
- Attending to personal matters on organization time
- Actions or attitudes which adversely affect HCC Network operation, members, or others.

Dress Code and Appearance

It is important for all students to project a professional image while training by being appropriately dressed. HCC Network training students are expected to be neat, clean and well-groomed while in the clinic/office setting. Clothing must be consistent with the standards for a business environment and must

be appropriate to the type of work being performed. All students will be expected to wear scrubs for class and clinicals throughout the duration of the program.

- Hair must be cleared away from the face.
- Facial hair must be covered by a face mask or shield.
- Jewelry such as rings, watches, bracelets, and dangling earrings must not be worn during patient treatment.
- Fingernails should be clean and short.
- Proper hygiene and the use of deodorant are expected.
- Cologne or perfume should not be used in excess.
- Scrubs should be clean, properly fitting, wrinkle free and in good repair (not frayed or torn)
- Undergarments should be worn and not visible.
- Shoes must be close toe and heel.

HCC Network is confident that all students will use their best judgment regarding attire and appearance. Executive Leadership reserves the right to determine appropriateness. Any student who is improperly dressed will be counseled or in severe cases may be sent home to change clothes. Continued disregard of this policy may be cause for disciplinary action, which may result in terminating the training contract between the student and HCC Network.

Technology

HCC Network has established a policy with regards to use of and access to its information systems. HCC Network's information systems include HCC Network- provided computers, laptops, office phones, office voicemail, mobile phones, mobile hot spots, internet access, internet service, Meta Point, electronic information storage (like hard drives or thumb drives), online information storage ("the cloud"), e-mail accounts, and other digital or electronic means and devices of storing, sending, receiving, or accessing data provided by HCC Network.

HCC Network maintains and provides information systems. The information systems provided by HCC Network are to assist and conduct business on behalf of HCC Network.

The information systems are the property of HCC Network. All messages, data, files, or information that is composed, sent, or received on the information system are and remain the property of HCC Network. They are not the private property of the employee. Employees and others shall have no expectation that any communication or information transmitted over HCC Network's information systems is or will remain private.

Passwords are unique for employee/student and are not to be shared except for IT personnel. The information systems are not to be used to create, store, or distribute offensive messages. Content prohibited by this policy includes sexually explicit, profane, obscene, intimidating, defamatory, or otherwise unlawful, inappropriate, offensive (including offensive material concerning sex, race, color, national origin, religion, age, disability, or other characteristic protected by law), or that violates HCC Network's equal employment opportunity policy or its policies against harassment or retaliation.

The information systems shall not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary information, or similar materials without prior authorization from Chief Administrative Officer or CEO.

HCC Network has the right, but not the obligation or duty, to monitor any and all aspects of its information systems, including, but not limited to, sites visited by employees or students, material downloaded or uploaded, phone calls, voicemail, and e-mail sent and received by users (including e-mail provided by third party services if HCC Network's information systems are used to access those accounts).

HCC Network's confidential information or its customers' confidential information should never be transmitted or forwarded to outside individuals or companies not authorized to receive the information. Even when data, a message, or other electronically stored information is erased, it is still possible to retrieve and read that message. All passwords used on HCC Network's information systems must be disclosed to HCC Network upon request.

Employees/Students are not authorized to retrieve and read any e-mail messages that are not sent to them. Any exception to this policy must receive written approval by HCC Network Chief Administrative Officer or CEO.

Employees/Students shall not use a code, access a file, or retrieve stored information, unless authorized to do so. Employees/Students shall not attempt to gain access to another employee's or student's information systems without the permission of the Chief Administrative Officer or CEO. HCC Network will acquire software licenses for all HCC Network approved software products, as required by the endorsed license agreements, to accommodate the number of personal computers with each software product. HCC Network policy forbids the use of illegally copied software.

Technical calculations, documents and other data shall be kept on hard- copied material as well as removable media and stored with other project related documents.

Employees/Students of HCC Network may not duplicate or copy any licensed software or copyrighted documentation/manuals for use either in HCC Network offices or elsewhere unless HCC Network is expressly allowed to do so though license agreement with the licensor. Unauthorized copying of licensed software or copyrighted printed material may subject the employee and/or HCC Network to both civil and criminal penalties under either federal or state law.

Employees/Students may not give copies of software, either licensed or in-house developed, to any non-company personnel, including clients, contractors, subcontractors, vendors, joint venture members, or any others. The only exception to this policy would be for internally developed software that was created as part of the scope of the work of a client contract.

Employees/Students may only use legally purchased/licensed software when conducting HCC Network's business, adhering to the terms of the license agreement issued by the software vendor. These include

stand-alone and network licenses. Each stand-alone personal computer requires a separate stand-alone license for each copy of the software product in use unless HCC.

Network has an agreement with the vendor for either a network license or multi-seat license. When software is licensed, it should be installed only on the personal computer for which it was acquired. The registration card or electronic registration shall be filled out and returned to the software vendor by information services. A copy of the registration card shall be kept in HCC Network's files. Software shall be registered in the name of HCC Network only. Original distribution media shall be stored in a central and safe storage facility maintained by HCC Network.

Licensed software may be installed and used only on HCC Network owned/leased personal computers. Employees/Students are forbidden from duplicating HCC Network licensed software for use on non-HCC Network owned computers. If an employee needs to use software on a non-HCC Network owned computer for business use, the employee should request that HCC Network acquire an additional license for that use.

All employees/students who discover a violation of these policies shall notify the responsible supervisor, the CAO, or the CEO.

Any employee/students who violates these policies or uses the information systems for improper purposes shall be subject to discipline, up to and including termination.

Social Media

This policy covers use of various social media platforms and programs, including but not limited to Twitter, LinkedIn, Facebook, Instagram, Snapchat, Indeed, TikTok, blogs, podcasts, product or service review sites like CitySearch, Yelp, Google, etc.

We understand that employees/students may maintain social media sites or profiles or may contribute posts to the sites or profiles of other people, businesses, or groups. It is important to understand that posts, images, tweets, and messages and e-mail can be re-sent around the world. Even if you take precautions to restrict access to your site, posts, or profile, it is possible that someone—even someone who is permitted to view the site—can copy it and use it in a way you did not intend. To protect HCC Network's interests, we expect that employees/students who maintain or contribute to social media sites will abide by the following guidelines, as well as practice common sense.

HCC Network's equipment, including computers, internet access, and electronic and digital systems and storage, are not to be used for employees' or students' personal social media. Working or class time should not be spent updating or creating personal social media posts, sites, and spaces.

When posting (which includes but is not limited to a blog post, a comment or wall post, status updates, modification of your profile, or "tweeting") about your work at home on your own time, you must abide at all times with all legal and ethical requirements, as well as HCC Network's policies regarding non-harassment and other matters including those governing the confidentiality of HCC Network's information and information of or about HCC Network's clients/customers/patients.

You may not disclose confidential or other inside information about HCC Network, its clients, customers, patients, or its employees that you learn in the course of your employment.

You should assume that people, including co-workers, supervisors, clients, customers, patients, and their family members, are reading your postings.

Be respectful. You may not make discriminatory, defamatory, libelous, or slanderous comments when discussing HCC Network, its officers, your supervisors or co-workers, our clients/customers/patients, or our competitors.

HCC Network may address as a disciplinary issue any language that you post in a blog or a social media site that reflects negatively on your work ethic or your level of commitment to and compassion for our clients/customers/patients.

Nothing in this policy is intended to prohibit, nor should it be interpreted as prohibiting, employees/students from engaging in communications with other company employees concerning working conditions or issues.

HCC Network strives to provide the best service and work environment possible. We welcome your concerns and suggestions for improvement. You should bring these to the Program Director.

We hope that our employees/students will recommend our products and services. However, HCC Network does not encourage its own employees/students to “mass market” our services online. If you—or someone in your immediate family, like a spouse, parent, child, or sibling—do make any such recommendation or review, the review must disclose the relationship.

HCC Network may monitor content on the Internet. Policy violations may result in discipline up to and including termination.

Cell Phone Policy

Employees and students are expected to exercise discretion in using cell phones and organization phones for personal use. Employees/students should restrict personal calls during work/class hours. Excessive personal calls during the workday can interfere with employee and student productivity and be distracting to others. Calls should be made and received on personal time unless an emergency. Some staff members are required to use their cell phone to conduct daily business and are an exception to this policy.

Cell phone use for personal calls or texting is discouraged while on business/class time. It is the employee’s and student’s responsibility to make sure their cell phones are secure. HCC Network will not be liable for the loss of any device. Cell phones should be placed in silent mode during the workday or class period. The use of cell phones without hands free devices while driving on organization time is prohibited.

First violation is a discussion between the Program Director and student, second violation is a verbal warning, third violation is a written warning, and the fourth violation could be termination or dismissal from the program.

Video or Audio Recording Devices

The use of cameras or other video or audio recording-capable devices on company premises is prohibited without the express prior permission of senior management and of the person(s) subject to recording. Video or audio recording in restrooms and/or locker rooms is prohibited.

Solicitations, Distributions and Posting of Materials

HCC Network prohibits the solicitation, distribution and posting of materials on or at organization property by any employee or non-employee, except as may be permitted by this policy. The sole exceptions to this policy are charitable and community activities supported by HCC Network management and organization- sponsored programs related to HCC Network's products and services.

Provisions:

- Nonemployees may not solicit employees or distribute literature of any kind on organization premises at any time.
- Employees may only admit nonemployees to work areas with management approval or as part of an organization-sponsored program. These visits should not disrupt workflow. An employee must always accompany the non-employee. Former employees are not permitted onto organization property except for official organization business.
- Employees may not solicit other employees during work times, except in connection with an organization-approved or sponsored event.
- Employees may not distribute literature of any kind during work times or in any work area at any time, except in connection with an organization-sponsored event.
- The posting of materials or electronic announcements are permitted with approval from the Chief Administrative Officer or CEO.
- Violations of this policy should be reported to the Chief Administrative Officer or CEO.

HCC Network Policies

Diversity and Inclusion Policy

HCC Network prohibits discrimination in service provision and employment practices and is committed to fostering an organization that respects and appreciates diversity and inclusion in its governance, employment, and service provision. It is the policy of HCC Network to afford equal employment opportunity administered in compliance with federal, state, and local laws to qualified individuals regardless of their race, color, gender, age, religion, national origin, citizenship, physical or mental abilities or characteristics, sexual orientation, gender identity or expression, genetic information, veteran status, economic status, or other protected group status. HCC Network complies with all applicable federal, state, and local laws, regulations, and ordinances. In keeping with the intent of this policy, HCC Network will adhere to the following practices:

- Governance: HCC Network will continue work to recruit individuals who will bring diversity and varying points of view and life experiences to its Board of Directors.

- Employment: Recruitment, hiring, and promotion of individuals in all job classifications will be conducted without regard to race, color, religion, sex, national origin, citizenship, age, physical or mental disability, sexual orientation, gender identity or expression, veteran status, economic status, or other protected group status, except where a bona fide occupational qualification exists. All other personnel actions, such as compensation, benefits, transfers, promotions, training and development, educational assistance, and social and recreational programs, will be administered without regard to race, color, religion, sex, national origin, age, physical or mental disability, sexual orientation, citizenship, gender identity or expression, veteran status, economic status, or other protected group status.
- Hiring and promotional decisions will be made in accordance with the principles of equal employment opportunity. Employment openings and services offered will be promoted through means and media that target communities as defined above (for example promote opportunities using media that target LGBTQIA+ communities, communities of color, etc.).
- Service Provision: It is further the policy and practice of HCC Network to provide services to all persons regardless of race, color, gender, age, religion, national origin, citizenship, physical or mental abilities or characteristics, sexual orientation, gender identity or expression, genetic information, veteran status, economic status, other protected group status or underserved populations.

HCC Network adopts a cultural competency philosophy that fosters an environment throughout the organization that recognizes the differences in each of us, capitalizes on our strengths, and maximizes our individual and collective potential. Toward this end, HCC Network will seek to assure that its governance, employment, and service provision reflect and promote the diversity of the community and will support efforts to end discrimination and disparities among diverse and underserved populations.

Americans with Disabilities Act (ADA) and the ADA Amendments Act (ADAAA)

The Americans with Disabilities Act (ADA) and the Americans with Disabilities Amendments Act (ADAAA) are federal laws that prohibit employers with fifteen or more employees from discriminating against applicants and individuals with disabilities. When needed, HCC Network will provide reasonable accommodation to applicants and employees who are qualified for a job, with or without reasonable accommodation, so that they may perform the essential job duties of the position.

It is the policy of HCC Network to comply with all federal and state laws concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC).

Furthermore, it is our organization policy not to discriminate against qualified individuals with disabilities regarding application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions, and privileges of employment.

The organization will provide reasonable accommodations to qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable

accommodation and/or if the accommodation creates an undue hardship to HCC Network. Contact the CAO with any questions or requests for accommodation.

Immigration Reform and Control Act

HCC Network complies with the Immigration Reform and Control Act, employing only those persons who are legally eligible to work in the United States.

HCC Network complies with the Immigration Reform and Control Act of 1986 by employing only U. S. citizens and non-citizens who are authorized to work in the United States. All employees are asked on their first day of employment to provide original documents verifying their right to work in the United States and to sign a verification form required by federal law (USCIS Form I-9). If an individual cannot verify their right to work within three days of hire, HCC Network must terminate their employment. Please contact the Human Resources Department with questions or concerns.

ANTI-DISCRIMINATION

Anti-harassment Policy and Complaint Procedure

HCC Network is committed to a work environment in which all individuals are treated with respect and dignity. Everyone has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, HCC Network expects that all relationships among persons in association with HCC Network business will be professional and free of bias, prejudice, and harassment.

It is the policy of HCC Network to ensure equal employment opportunity without discrimination or harassment based on race, color, religion, gender, gender identity or expression, sexual orientation, national origin, age, disability, genetic information, marital status, amnesty, or status as a covered veteran. HCC Network prohibits any such discrimination or harassment.

HCC Network encourages reporting of all perceived incidents of discrimination or harassment to the CAO. If the CAO is not available, the CEO should be notified. It is the policy of HCC Network to investigate such reports promptly and thoroughly. HCC Network prohibits retaliation against any individual who reports discrimination or harassment or who participates in an investigation of such reports.

Harassment based on any protected characteristic is prohibited. Under this policy, harassment is verbal, written or physical conduct that belittles or shows hostility or aversion toward an individual because of their race, color, religion, gender, gender identity or expression, sexual orientation, veteran status, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law or that of their relatives, friends or associates, and that; a) has the purpose or effect of creating an intimidating, hostile or offensive work environment; b) has the purpose or effect of unreasonably interfering with an individual's work performance; or otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes epithets, slurs or negative stereotyping; gossiping, threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is displayed on the employer's premises or circulated in the workplace, on organization time or using organization equipment via e-mail, phone (including voice messages), text messages, tweets, blogs, social networking sites, or other means.

These policies apply to all applicants, employees, vendors, consultants, customers, or any other person(s) directly or indirectly connected to HCC Network.

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

Sexual Harassment

Sexual harassment constitutes discrimination and is illegal under federal, state, and local laws. For the purposes of this policy, sexual harassment is defined by the Equal Employment Opportunity Commission Guidelines as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when, for example a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess, or sexual deficiencies; leering, whistling, or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal, or visual conduct of a sexual nature.

Workplace Bullying

HCC Network defines bullying as "repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment." Such behavior violates the organization Code of Conduct, which clearly states that all employees will be treated with dignity and respect.

The purpose of this policy is to communicate to all employees, including directors and executives, that the organization will not tolerate bullying behavior. Employees found in violation of this policy will be disciplined up to and including termination.

Bullying may be intentional or unintentional. However, it must be noted that where an allegation of bullying is made, the intention of the alleged bully is irrelevant and will not be given consideration when delivering discipline. As in sexual harassment, it is the effect of the behavior upon the individual that is important. HCC Network considers the following types of behavior examples of bullying:

- Verbal bullying: Slandering, ridiculing, or maligning a person or their family; persistent name calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.
- Physical bullying: Pushing, shoving, kicking, poking, tripping, assault, or threat of physical assault; damage to a person's work area or property.
- Gesture bullying: Nonverbal threatening gestures or glances that convey threatening messages.
- Exclusion: Socially or physically excluding or disregarding a person in work-related activities.

Violence in the Workplace

All employees, patients, members, customers, vendors, and business associates must always be treated with courtesy and respect. Employees are expected to refrain from conduct that may be dangerous to others.

Conduct that threatens, intimidates, or coerces another employee, patient, member, customer, vendor, or business associate will not be tolerated. HCC Network resources may not be used to threaten, stalk, or harass anyone at the workplace or outside the workplace. HCC Network treats threats coming from an abusive personal relationship as it does other forms of violence.

Indirect or direct threats of violence, incidents of actual violence and suspicious individuals or activities should be reported as soon as possible to your direct supervisor. If your direct supervisor is unavailable or is the alleged perpetrator, report this incident to the CAO. When reporting a threat or incident of violence, the employee should be as specific and detailed as possible. Employees should not place themselves in danger, nor should they attempt to intervene during an incident.

Employees should promptly inform the CAO of any protective or restraining order that they have obtained that lists the workplace as a protected area. Employees are encouraged to report safety concerns regarding intimate partner violence. HCC Network will not retaliate against employees making good-faith reports. HCC Network is committed to supporting victims of intimate partner violence by:

- Providing referrals to HCC Network's employee assistance program (EAP)
- Connecting the employee to community resources
- Providing time off for reasons related to intimate partner violence in adherence with our PTO policy.

HCC Network will investigate promptly and thoroughly all reports of threats of violence, incidents, actual violence, and suspicious individuals or activities. The identity of the individual making the report will be protected as much as possible. HCC Network will not retaliate against employees making good-faith reports of violence, threats, suspicious individuals, or activities. To maintain workplace safety and the integrity of its investigation, HCC Network may suspend employees suspected of workplace violence or threats of violence, with or without pay, pending investigation.

Anyone found to be responsible for threats of or actual violence or other conduct that is in violation of these guidelines, will be subject to prompt disciplinary action up to and including termination of employment. Likewise, anyone found to be responsible for fabricating false threats or violence will be subject to disciplinary action.

HCC Network encourages employees to bring their disputes to the attention of their supervisor and CAO, when necessary, before the situation escalates. HCC Network will not discipline employees for raising such concerns.

Individuals who believe they have been the victims of conduct prohibited by this policy statement or who believe they have witnessed such conduct should discuss their concerns with their supervisor and CAO, when necessary.

When possible, HCC Network encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that their behavior is unwelcome and request that it be discontinued. Often this action alone will resolve the problem. HCC Network recognizes, however, that an individual may prefer to pursue the matter through complaint procedures.

HCC Network encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken before relationships become irreparably strained. Therefore, although no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment.

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have relevant knowledge. Confidentiality will be maintained throughout the investigation to the extent consistent with adequate examination and appropriate corrective action or termination.

Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

If a party to a complaint does not agree with its resolution, that party may appeal to HCC Network's CAO or CEO if the CAO is unavailable. False and malicious complaints of harassment, discrimination, or retaliation may be the subject of appropriate disciplinary action and/or termination.

Substance Use / Drug Screen

HCC Network is committed to protecting the safety and well-being of all students training in our organization. We recognize that alcohol abuse and drug abuse pose a significant threat to our goals. For this reason, we have established a drug-free workplace policy that balances our respect for individuals with the need to maintain an alcohol and drug-free environment.

Any individual who is affiliated with HCC Network or applies to train with HCC is covered by our drug-free workplace policy. Our policy includes, but is not limited to, full-time employees, part-time employees, volunteers, contractors, interns, clinical training students and applicants. Our drug-free workplace policy is intended to apply whenever anyone is representing or conducting business for HCC

Network. Therefore, this policy applies during all working/classroom hours, whenever an individual is conducting business or representing HCC, and while an individual is on call, on company property and at company-sponsored events.

It is a violation of this policy to use, sell, possess, trade and/or offer to sell alcohol, illegal drugs or intoxicants. In accordance with the federal Drug-Free Workplace Act, individuals convicted of a criminal drug violation, including misdemeanors, occurring on company property or company time must notify HCC Network within five calendar days of the conviction. This includes any findings of guilt, pleas of “no contest” and impositions of fines, jail sentences or other penalties. HCC will take appropriate action within 30 days of notification. Federal contracting agencies will be notified when appropriate.

Disciplinary Actions

Students who test positive for drugs and/or alcohol, or who refuse to submit to testing, will be subject to disciplinary action(s), up to and including termination. A student who tests positive for drugs and/or alcohol will be required to complete any (or all) of the following actions before they are allowed to return to the organization:

- Receive a certification issued by a qualified medical professional stating that they are free from drug and/or alcohol use.
- Take a drug and/or alcohol test, receive negative test results and consent to follow-up testing.

Testing

Students may be subject to random drug and alcohol testing at any time, with or without notice. To ensure accuracy and fairness, all testing will be conducted according to Substance Abuse and Mental Health Services Agency (SAMHSA) guidelines, where applicable and will include a screening test; a confirmation test; the opportunity for a split sample; review by a Medical Review Officer, including the opportunity for students who test positive to provide a legitimate medical explanation, such as a physician's prescription, for the positive result; and a documented chain of custody.

All drug-testing information will be maintained in separate confidential records. Reasonable Suspicion Testing: If there is suspicion that a student is under the influence of drugs and/or alcohol while on company property or time, the student will be required to take a drug and/or alcohol test. Reasonable suspicion will be based on observable instances or actions such as, but not limited to, the following:

- Dangerous conduct
- Unexplained decrease in job performance
- Hostile interpersonal relations
- Possession of drug paraphernalia
- Noticeably reduced short-term memory
- Physical symptoms (including bloodshot eyes, slurred speech and vomiting)
- Anxiety
- Inability to concentrate.
- Follow-up Testing: Students who have tested positive for drugs and/or alcohol, and students who have attended drug and/or alcohol-related counseling may not return to work until they have been evaluated by a medical professional in a substance abuse treatment facility and have

successfully passed a drug and/or alcohol test. Students who return to HCC will be subject to follow-up tests, all of which will be unannounced.

- Any student who tests positive may be immediately removed from the program. Each of the following actions constitutes a refusal to submit to testing:
- Failure to provide an adequate urine, blood, breath or saliva specimen for a
- drug and/or alcohol test without a valid medical explanation
- Failure to be escorted to a testing facility.
- Tampering with, altering, or diluting a specimen
- Refusing to sign a Chain of Custody form at the testing facility.

Students do have the option to refuse to submit to drug and/or alcohol tests; however, doing so will constitute a violation of this policy. Refusal to take a drug and/or alcohol test will also be considered a positive test result, which subjects the student to disciplinary action(s). Students who apply, who are asked to submit to a drug and/or alcohol test and who refuse to submit to drug and/or alcohol testing will not be considered for training with HCC Network.

Laboratory Testing

All drug and/or alcohol testing will be conducted in a laboratory certified by Department of Health and Human Services (HHS), according to the following procedures: (1) specimens will be screened for amphetamines, benzoylecgonine (cocaine), opiates, phencyclidine (PCP) and tetrahydrocannabinol (THC or marijuana); and (2) test results will be confirmed by gas chromatography/mass spectrometry (GC/MS). HCC reserves the right to test for other substances as well.

No specimen will be considered positive until it has been confirmed at the level established by HHS. If no established levels have been set by HHS for a tested substance, HCC will hold the testing facility responsible for establishing an acceptable level. Test results for alcohol revealing a blood alcohol content of .04 or greater will be considered positive.

Results

Positive test results will be reported to the Medical Review Officer (MRO), who will then contact the student to discuss the results. Should the MRO be unable to contact the employee, they will contact HCC for assistance. If the MRO cannot contact the student within five days of testing or the results reveal a major safety concern, the MRO may disclose positive test results to HCC. At that point, HCC reserves the right to take the student off active duty until the MRO can contact the student. When the MRO does contact the student, and only if he or she can provide a viable reason for why the test came back positive, then the positive test result will be reported to HCC as negative.

Use of Prescription Medications

Nothing in this policy prohibits the appropriate use of prescription medication as legally prescribed by a licensed physician. If an employee is taking prescription medication with potential side effects that may infringe on the safety of the student or others, they must notify HCC. Failure to do so may result in disciplinary action, up to and including termination.

HCC may contact the student's physician to investigate whether it is necessary to impose restrictions on job duties because of the student's use of prescription medication. If HCC and the physician determine that the student should be removed from performing his or her job duties, HCC will notify the student immediately.

Results of all drugs and/or alcohol testing will be kept separate from student personnel files and treated as confidential information. No results, whether positive or negative, will be shared with anyone outside of the student's direct chain of command, except when necessary for treatment or physician confirmation purposes.

HCC prohibits all students from manufacturing, distributing, dispensing, possessing, or using an illegal drug in or on organization premises or while conducting organization business. Students are also prohibited from misusing legally prescribed or over-the-counter (OTC) drugs. Law enforcement personnel shall be notified, as appropriate, when criminal activity is suspected. NOTE: HCC may disclose the results of a drug and/or alcohol test to decision-makers in a lawsuit, grievance or other proceeding initiated by or on behalf of the student.

Smoke, Vape, and Tobacco Free Workplace

It is the policy of HCC Network to prohibit smoking, vaping, and tobacco on all organization premises to provide and maintain a safe and healthy work environment for all employees. The law defines smoking as the "act of lighting, smoking or carrying a lighted or smoldering cigar, cigarette, e-cigarette, smokeless tobacco or pipe of any kind."

The smoke, vape, and tobacco free workplace policy applies to all areas of organization buildings, organization-sponsored off-site conferences and meetings, vehicles owned or leased by the organization, visitors including patients, customers and vendors, contractors, and consultants and/or their employees working on the organization premises and all employees, temporary employees, and student interns. Employees who violate the smoke and tobacco free policy will be subject to disciplinary action up to and including immediate termination.

Confidentiality and Publicity

As a result of your student status at HCC Network, you may acquire and have access to confidential information belonging to the organization of a special and unique nature and value, relating to such matters as the organization's personnel and compensation information; accounts; procedures; handbooks; financial data; accounting and bookkeeping practices; financial information; data records and reports; organizational plans; existing and potential business opportunities for HCC Network; confidential reports; litigation and other legal matters; as well as information specific to HCC Network's business.

As a condition of student status, you agree that all such information is the exclusive property of HCC Network and that you will not at any time divulge or disclose to anyone, except in the responsible exercise of your job, any such information, whether it has been designated specifically as "confidential".

If you are ever asked any information or comments from a newspaper, radio, television, or other news reporter relating to your student status, or any other matter pertaining to HCC Network, refer the person making the inquiry to the CAO and CEO.

Conflicts of Interest

Employees must avoid any relationship or activity that might impair, or even appear to impair, their ability to make objective and fair decisions when performing their jobs. At times, an employee may be faced with situations in which business actions taken on behalf of HCC Network may conflict with the employee's own personal interests. Organization property, information or business opportunities may not be used for personal gain.

Conflicts of interest could arise in the following circumstances:

- Being employed by, or acting as a consultant to, a competitor or potential competitor, supplier, or contractor, regardless of the nature of the employment, while employed with HCC Network
- Hiring or supervising family members or closely related persons
- Serving as a board member for an outside commercial organization or organization
- Owning or having a substantial interest in a competitor, supplier, or contractor
- Accepting gifts, discounts, favors, or services from a customer/potential customer, competitor, or supplier, unless equally available to all organization employees

Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their supervisor or the CAO and CEO.

Background Checks

HCC Network conducts background checks on all training student candidates prior to acceptance in the program. A third-party administrator may be used to conduct the background checks, and all background checks will be compliant with applicable laws, such as the Fair Credit Reporting Act.

The information that may be collected includes, but is not limited to:

- Criminal background
- Employment history
- Education
- Credit
- Professional and personal references

Criminal background checks may not be used as the sole reason for denying training opportunities, unless it is job-related. Regardless, HCC Network has the right to make the final decision about training an individual after the background check is complete.

Information obtained from the background check process, including information from professional and personal references, will be used by HCC Network only as part of the training process and will be kept confidential.

Inclement Weather Policy

Students will follow the policy and procedure for HCC Network clinic closures due to inclement weather.

Immunizations

Immunizations/titers listed below are recommended for health care workers by the Centers for Disease Control (CDC). In addition, HCC Network requires documentation for immunization/titer results or waivers, on all students upon request. It is the HCC Network's policy that the following immunization requirements be complete or waived before students can participate in a clinical experience.

- **Hepatitis B**

The Hepatitis B Vaccine Official Documentation must be provided for all three injections and/or a titer drawn showing proof of immunity OR a signed Hepatitis B waiver must be on file in the Chief Administrative Officer's files. Note: signing the waiver releases you from having a titer drawn if you have had the 3 injections. It is the choice of the student whether they want information regarding immunity.

- **Chickenpox (varicella)**

Complete an IGG titer. Titer must be dated and the result showing evidence of immunity must be a part of the official documentation. (Equivocal or Negative is not acceptable.) If no immunity is present, two immunizations must be taken OR have two immunizations 4 weeks apart.

- **Measles, Mumps, Rubella**

Complete an IGG titer for each (measles, mumps, rubella). Titers must be dated and the result showing evidence of immunity for each (measles, mumps, rubella) must be a part of the Official Documentation. (Equivocal or Negative is not acceptable.) If no immunity is present, two immunizations must be taken OR have two immunizations 4 weeks apart.

- **Tuberculosis Screen**

Must have official documentation of a current annual skin test (cannot be over one year old). If you have an expired or never had a TB skin test, then the 2 step Mantoux skin test is required. Results must be documented in millimeters of tissue involvement (induration). If TB test is positive or the student has history of positive skin tests, a Negative Chest X-Ray (less than two years old) is required.

- **Tetanus-Diphtheria**

The initial series is typically given in childhood and boosters are required every ten years. The booster should be of Tetanus-Diphtheria and acellular pertussis (TDaP). If the booster has been given within the last ten years, provide Official Documentation of the date (month/day/year) of the immunization. If the booster is ten years old or older, have the TDaP immunization and provide Official Documentation of the date (month/day/year) of the immunization. Titers are not acceptable for any portion of TDaP.

- **Covid-19 Vaccination**

Centers for Medicare and Medicaid Services (CMS), in collaboration with the Centers for Disease Control and Prevention (CDC), is requiring vaccinations for Federally Qualified Health Center settings, as a condition for participating in Medicare and Medicaid programs. As a health care organization, HCC Network is committed to protecting the health and well-being of our employees, patients, visitors, students, and community. All HCC Network employees and students are required to either receive a COVID-19 vaccine or provide a medical or religious waiver. Each exemption request will be evaluated on a case-by-case basis to determine if the request can be safely accommodated without undue hardship to HCC Network and provide for the safety of patients and staff.

- **Influenza Vaccine**

The Centers for Disease Control and Prevention recommends annual influenza immunization for all health care workers to prevent the spread of influenza. As a health care organization, HCC Network recognizes and supports the influenza prevention program. Vaccination is a requirement for employment and students, unless contraindicated. All HCC Network employees and students are required to either receive an annual vaccine or provide a medical, personal, or religious waiver by October 1 of each calendar year. Waivers must be submitted annually and signed by a healthcare provider prior to submission.