



Greater Oregon Behavioral Health, Inc.

Volunteer Driver Guidebook

MISSION

Greater Oregon Behavioral Health, Inc. is a rural/frontier Behavioral Health and Social Services Network empowering individuals and communities to achieve better health.

VISION

We envision strong, healthy communities where all individuals are supported in achieving health, wellness and their full potential.

Introduction and Welcome

Hello and Welcome to GOBHI,

Thank you for choosing to volunteer your time with GOBHI Non-Emergency Medical Transportation (NEMT). You are providing a much needed service in your community. We are excited to partner with you.

GOBHI NEMT provides, on average, over 150,000 rides per year..We could not do this without our valuable volunteers. You help the people we serve get to important medical and behavioral health appointments.

A skilled team supports you. The NEMT Support Specialist is your primary contact..The NEMT Credentialing and Grievance Specialist will help you stay current on required training. There are 8 Brokerage Intake Specialists who handle over 200 calls per day. The NEMT Supervisor and Manager are available as well.

We are grateful that you have taken this journey with us. Together, we can improve the lives and wellbeing of the people we serve.

With Gratitude,

Kris Boler
NEMT Manager

NEMT Program

Non-Emergent Medical Transportation provides access for Eastern Oregon Coordinated Care Organizations' members to medically appropriate services. GOBHI is the contracted Brokerage that provides the eligibility screening, acquires and manages transportation providers and assigns the rides to the appropriate providers. Types of services include rides for ambulatory persons, persons who use mobility devices, and stretchers, as well as secured rides and reimbursement for persons who drive themselves and have overnight stays out of their home area.

Providing the best possible services for our members and the communities we serve is a top priority for GOBHI. NEMT Volunteer Drivers are an important part of these services. This guidebook provides you with information on our expectations, what you can expect and policies and laws you will need to know.

Nothing contained in this guidebook shall be interpreted as creating or defining an employment relationship between GOBHI and any individual. Volunteers donate their services to GOBHI out of a charitable motivation and without contemplation of pay or benefit.

Confidentiality

GOBHI's unique service to our Members and the nature of our work requires that their protected health information is held in confidence. During your volunteer service, you may encounter information that, while not protected health information, should nevertheless be held confidential. Any unauthorized use or disclosure of member or patient health information will cause termination of the volunteer relationship.

Being Flexible

When we exceed our members' expectations, they will tell others about their experience. By working together, we will support members and communities. Due to the nature of our business, outside variables such as weather, adverse road conditions and fluctuations in business volume may require flexibility on the part of our volunteers.

Every role is important to the successful operation of GOBHI. You have an obligation to our community and others to arrive on time and as scheduled. We work together as a team to provide our services. In the event of an unplanned absence, you must communicate the absence with the NEMT Support Specialist.

Policy Against Harassment, Discrimination and Retaliation

I. Purpose of Policy

The Company is committed to providing a workplace free of unlawful harassment and discrimination. This includes sexual harassment (which includes harassment based on pregnancy, perceived pregnancy, childbirth, breastfeeding, or related medical conditions) and harassment based on actual or perceived gender, gender identity (including transgender identity, status and transitioning), gender expression and sex stereotyping, as well as

harassment based on such factors as race (including hair texture and natural hair styles or), color, religion, religious creed (including religious dress and religious grooming), national origin, ancestry, citizenship, age, physical or mental disability, legally-protected medical condition or information (including genetic information), family care or medical leave status, military caregiver status, military status, veteran status, marital status, domestic partner status, sexual orientation, status as a victim of domestic violence, sexual assault or stalking, enrollment in a public assistance program, engaging in protected communications regarding employee wages, requesting a reasonable accommodation on the basis of disability or bona fide religious belief or practice, or any other basis protected by federal, state, or local laws. The Company strongly disapproves of and will not tolerate harassment of or discrimination against applicants, employees, interns, or volunteers by managers, supervisors, co-workers or third parties with whom employees come into contact. Similarly, the Company will not tolerate harassment by its employees of non-employees with whom the Company employees have a business, service, or professional relationship.

II. Harassment Defined

Harassment includes verbal, physical, and visual conduct that creates an intimidating, offensive, or hostile working environment or that interferes with an employee's work performance. Such conduct constitutes harassment when (1) submission to the conduct is made either an explicit or implicit condition of employment; (2) submission or rejection of the conduct is used as the basis for an employment decision; or (3) the harassment interferes with an employee's work performance or creates an intimidating, hostile, or offensive work environment.

Harassing conduct can take many forms and may include, but is not limited to, the following: slurs, jokes, insults, statements, gestures, teasing, assault, impeding or blocking another's movement or otherwise physically interfering with normal work, pictures, posters, symbols, drawings, or cartoons, violating someone's "personal space" (for example by blocking someone's way) foul or obscene language, leering, stalking, staring, unwanted or offensive letters or poems, offensive email or voicemail messages, or any kind of verbal, visual or physical conduct that denigrates or shows hostility or aversion towards an individual because of any protected characteristic.

Sexually harassing conduct in particular may include all of these prohibited actions, as well as other unwelcome conduct, such as requests for sexual favors, conversation containing sexual comments, and other unwelcome sexual advances. Sexually harassing conduct can be by a person of either the same or opposite sex. Sexually harassing conduct need not be motivated by sexual desire to be violative of this policy.

Retaliation means adverse conduct taken because an individual reported an actual or perceived violation of this policy, opposed practices prohibited by this policy, or participated in the reporting and investigation process described below. "Adverse conduct" includes but is not limited to:

1. shunning and avoiding an individual who reports harassment, discrimination or

retaliation;

2. express or implied threats or intimidation intended to prevent an individual from reporting harassment, discrimination or retaliation; or
3. denying employment benefits because an applicant or employee reported harassment, discrimination or retaliation or participated in the reporting and investigation process.

III. Reporting & Investigating Harassing, Discriminatory & Retaliatory Conduct

All employees, independent contractors, interns, and volunteers of the Company must promptly report any incidents of harassment, discrimination, and retaliation so that the Company can take appropriate action.

A. Complaint Procedure

It is the responsibility of all of us to contribute to a work environment that is free of unlawful bias, discrimination, harassment, and retaliation. Failure to bring forth a complaint prevents the Company from having the opportunity to correct the situation.

Any employee who believes they have been subject to or has witnessed illegal discrimination, harassment, or retaliation, including work-related harassment by any Company personnel or any other person, or any conduct believed to violate this policy, is requested and encouraged to make a complaint. You may complain directly to your immediate supervisor or department manager, the HR director, or any other member of management with whom you feel comfortable bringing such a complaint. Similarly, if you observe acts of discrimination toward or harassment of another employee, you are requested and encouraged to report this to one of the individuals listed above.

Managers and supervisors have a special responsibility under this policy. All levels of management and all supervisors are responsible for compliance with this Policy Against Harassment, Discrimination, and Retaliation AND for ensuring that everyone in their department is aware of, understands and adheres to this policy. Supervisors and managers who receive complaints or who observe or learn of discriminatory, harassing, or retaliatory conduct must immediately inform the Human Resources Director or other appropriate company official so that an investigation may be initiated.

Washington - In addition to notifying the Company about harassment or retaliation complaints, affected employees may also direct their complaints to the Equal Rights Commission (1-800-669-4000), the Washington State Human Rights Commission (www.hum.wa.gov/file-compliant), and local advocacy groups focused on preventing sexual harassment and sexual assault.

IV. Corrective Action

All complaints will be investigated promptly and, to the extent possible, with regard for confidentiality. The Company prohibits conduct severe enough to be unlawful. Yet even more, the Company's workplace conduct standards also prohibit conduct and comments which are not severe enough to violate state or local or federal law—but which are still inappropriate in

the workplace. For example, the Company prohibits abusive conduct in the workplace—whether or not it is based on a protected category.

As a result, the Company will take prompt, appropriate, and effective corrective action (e.g., remedial measures) any time it is established that discrimination, harassment, or retaliation in violation of this policy has occurred—whether or not such violation also violates the law.

Corrective action may include, for example: training, referral to counseling, or disciplinary action ranging from a verbal or written warning to termination of employment, depending on the circumstances. With regard to acts of harassment or discrimination by customers or vendors, corrective action will be taken after consultation with the appropriate management personnel.

The Company will not tolerate retaliation against any employee for making a good faith complaint of harassment, discrimination, or retaliation, or for cooperating in an investigation.

V. Zero Tolerance

The Company does not tolerate and prohibits discrimination, harassment or retaliation of or against job applicants, contractors, interns, volunteers or employees by another employee, supervisor, vendor, customer or any third party on the basis of race, color, creed, religion, age, sex or gender (including pregnancy, childbirth and related medical conditions), sexual orientation, gender identity or gender expression (including transgender status), national origin, ancestry, marital status, protected medical condition as defined by state law (cancer or genetic characteristics), physical or mental disability, military and veteran status, genetic information, or any other characteristic protected by applicable federal, state or local laws and ordinances. The Company is committed to a workplace free of discrimination, harassment and retaliation.

Our management team is dedicated to ensuring the fulfillment of this policy as it applies to all terms and conditions of employment, including recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities and general treatment during employment.

Code of Conduct

The GOBHI Code of Conduct applies to all members of the GOBHI workforce, volunteers, and the members of GOBHI's Board.

Ethical Conduct and Compliance: In the performance of duties, GOBHI volunteers will set an example of ethical behavior, and comply with all laws and regulations that govern our business. GOBHI volunteers must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

Business and Financial Information

Accuracy, Retention and Disposal of Documents and Records: You are responsible for the integrity and accuracy of any organizational documents or records that you write or modify.

Falsifying or altering documents or records is absolutely prohibited. This includes improperly back-dating documents. You are also expected to become familiar with and comply with GOBHI policies and procedures that address the retention and disposal of the organization's documents and records.

Conflict of Interest: A conflict of interest occurs when personal interests could interfere with your ability to make a fair and objective decision on behalf of GOBHI. You should avoid relationships and activities that create, or even appear to create, a conflict of interest. If you are unsure whether a conflict of interest exists, you should talk with the person to whom you report or the Corporate Integrity Officer.

Gifts and Gratuities: Unless authorized in advance, you should graciously decline when offered tips, gratuities or gifts from salespeople, vendors or suppliers. GOBHI volunteers may not take bribes from or give "kickbacks" to other volunteers, staff, consultants, vendors, suppliers or competitors.

Copyrights and Software Licensing: Use third-party software and related resources only as permitted by software licenses. Do not make or use copies of non-licensed copyrighted material, including written or graphic content, software or photographs.

Personal Use of GOBHI Resources: Anything beyond incidental personal use of GOBHI materials, supplies or equipment is prohibited without prior approval from your team leader. You must not remove property from a facility owned or managed by GOBHI without proper authorization. If removed, property must be returned to the facility as soon as practicable after it is no longer needed for authorized purposes.

Reporting Obligation and Resources

Personal Obligation to Report: You should report any activity that appears to violate applicable laws, rules, regulations or the GOBHI Code of Conduct. If you report a concern, but believe that it has not been resolved, contact the GOBHI Corporate Compliance Officer or the Human Resources Director

Resources for Guidance: We encourage you to discuss concerns with the NEMT Support Specialist or the GOBHI CEO. If you are uncomfortable doing so, you can discuss the situation with the GOBHI Corporate Compliance Officer. You may contact him/her/them directly or call the **GOBHI Hotline at 1-844-773-7237**. GOBHI cannot guarantee that it will keep your identity confidential if you report a concern or possible misconduct, but we will maintain confidentiality within the limits of the law and our ability to investigate the issues you have brought to our attention. GOBHI absolutely prohibits, and will not tolerate, retaliatory discipline against a volunteer who reports concerns using the channels described above. Claims of retaliation will be investigated and, if substantiated, appropriate action will be taken. GOBHI takes health care fraud and abuse very seriously. It is our policy to provide information to all employees, volunteers and agents about the federal and state false claims acts, remedies available under these acts and how employees and others can

use them, and about whistleblower protections available to anyone who claims a violation of the federal and state false claims acts. We will also advise our employees, volunteers and agents of the steps GOBHI have put in place to detect health care fraud and abuse.

Fraud, Waste and Abuse

GOBHI takes health care fraud and abuse very seriously. It is our policy to provide information to all employees, contractors and agents about the federal and state false claims acts, remedies available under these acts and how employees and others can use them, and about whistleblower protections available to anyone who claims a violation of the federal false claims acts. We will also advise our employees, contractors and agents of the steps GOBHI has put in place to detect health care fraud and abuse.

The Federal False Claims Act is a federal law that imposes liability on persons and companies who defraud governmental programs. It is the federal government's primary litigation tool in combating fraud against the government. The law includes a qui tam provision that allows people who are not affiliated with the government, called

"relators" under the law, to file actions on behalf of the government (informally called "whistleblowing"). Persons filing under the Act stand to receive a portion of any recovered damages. This statute allows a civil action to be brought against a health care provider who:

- Knowingly presents, or causes to be presented, a false or fraudulent claim for payment or approval to any federal employee;
- Knowingly makes, uses or causes to be made or used a false record or statement to get a false or fraudulent claim paid; or
- Conspires to defraud the government by getting a false or fraudulent claim allowed or paid (31 USC SEC 3729(a)).

Examples of a False Claim:

- Billing for procedures not performed
- Up-coding health care services
- Falsifying information in the medical record

Remedies: A federal false claims action may be:

- brought by the U.S. Department of Justice, or brought by an individual as a qui tam action (this means the individual files an action on behalf of the government);
- punishable by a civil penalty of between \$11,181 and \$22,363 per false claim, plus three times the amount of damages incurred by the government; and
- subject to a statute of limitations that controls how much time may pass before an action may no longer be brought for violation of the law.

Under the False Claims Act, the statute of limitations is six (6) years after the date of violation or three (3) years after the date when material facts are known or should have been known by the government, but no later than ten (10) years after the date on which the violation was committed.

Federal Whistleblower Protections: Federal Law prohibits an employer from discriminating against an employee who initiated or otherwise assisted in a false claims action. The employee is entitled to all relief necessary to make the employee whole. 31 USC 3730(h)

Oregon Whistleblower Statutes: Criminal and civil laws that prohibit Medicaid fraud are outlined below.

It is a crime if a health care provider knowingly submits, or causes to be submitted, a claim for payment to which the provider is not entitled. ORS 180.755; ORS 411.675; ORS 165.690.692

A health care provider is subject to civil damages if it has been previously warned against certain billing practices. ORS 411.690(2))

Oregon Whistleblower Protections: Oregon law contains several provisions that prohibit retaliatory action by a health care provider against an employee who, in good faith, brings evidence of unlawful practices to the attention of the proper authority. ORS 441.181, ORS 441.057, ORS 659A.233, ORS 659A.203. Further, an employee who believes he or she is the victim of retaliation may file a complaint with the Oregon Bureau of Labor and Industries.

Procedure for Reporting: If you think that GOBHI may have made a false claim as discussed above, GOBHI encourages you to: Report it to the Corporate Compliance Officer at (541) 256-4599 or call the GOBHI Hotline at (800) 773-7237 or at www.gobhi.ethicspoint.com for further investigation. You may also report it directly to the federal Department of Justice; you are not required to report a possible false claims act violation to GOBHI first.

Report any retaliation you may experience from GOBHI if you inform GOBHI or the federal government of a possible false claims act violation to the Federal Department of Justice.

GOBHI Policies and Procedures for Detecting Fraud and Abuse: Policies and procedures for detecting fraud and abuse are found in the GOBHI Ethics and Compliance Program. More detailed information about the False Claims Act is available from the Corporate Compliance Officer.

Training Policy: GOBHI will train all new members of our workforce, contractors and agents regarding federal and state false claims acts and also provide periodic updates

for existing members of our workforce, contractors and agents. All members of GOBHI's workforce are required to participate in training. All contractors and agents are required to participate in scheduled training, as determined by GOBHI's Corporate Compliance Officer.

Medicaid Waste and Abuse: In addition to an intolerance of Medicaid fraud, GOBHI prohibits Medicaid waste and abuse, defined as follows:

Waste: The over-utilization of services, or practices that result in unnecessary costs, such as providing services that are not medically necessary.

Abuse: means improper behaviors or billing practices including, but not limited to:

- Billing for a non-covered service;
- Misusing codes on the claim (i.e., coding that does not comply with national or local coding guidelines or is not billed as rendered); or
- Inappropriately allocating costs on a cost report.

Additional Information: If you have any questions about this information, you may contact the GOBHI Corporate Compliance Officer at (541) 256-4599 or call the GOBHI Hotline at (800) 773-7237.

Obeying All Laws: Members of GOBHI's workforce are required to follow all applicable federal, state and local laws. Any member of the GOBHI workforce who believes himself or herself to have received instructions otherwise must immediately inform the Corporate Compliance Officer or members of the GOBHI Board of Directors.

Workplace Threats and Violence

GOBHI will not tolerate any person making threats, exhibiting threatening behavior or engaging in violent acts while providing volunteer services or on GOBHI premises, including parking lots. GOBHI will initiate an appropriate response to threats or violent acts to include but not limited to: removal from the premises, suspension and/or termination of volunteer role, and/or criminal prosecution of the person or persons involved. Unless it creates a safety risk to the volunteer, GOBHI volunteers should immediately report anyone engaged in or threatening violent behavior to the NEMT Support Specialist. Volunteers should avoid any risk of danger and if appropriate, notify law enforcement of threats or actual violence.

Problem Resolution and Grievances

GOBHI believes in providing the means for volunteers to bring problems and complaints concerning their service to the NEMT Support Specialist, Human Resources or Chief Executive Officer. All complaints or incidents will be documented and placed in a confidential file. All complaints must be made in good faith and without malicious intent. Volunteers with complaints of harassment may contact the Human Resources Department or Chief Executive Officer directly. GOBHI will notify the Executive Committee of problems or grievances when there is reasonable cause to believe that GOBHI is at financial risk.

Criminal Record/Background Checks

As a qualified entity defined under ORS 181.533 1(b) (A), GOBHI shall take reasonable measures to determine the overall suitability of a subject individual to provide volunteer services.

Criminal history checks for current employees, contractors and volunteers will be performed as required by Oregon statutes. If the criminal background investigation reveals prior criminal activity, this information will be included in determining the suitability of the volunteer for continued service with GOBHI. Volunteer approval is contingent on cleared criminal record, reference, education and other position-required checks.

Safety: A Genuine Concern for Your Safety

GOBHI's goal is to provide a safe environment for our volunteers, community and those we serve. It is crucial for all of us to use sound safety practices. Preventing accidents and observing safety rules is every employee's job. We must all use on-the-job safety awareness and assess and improve our working areas to ensure that our environment is enjoyable, productive, and safe.

Safe Practices

- Know your limits. Ask for help when needed.
- Take the time to do the job right.
- Report all accidents and unsafe work conditions to the NEMT Support Specialist or the Safety Committee.
- Use proper body posture when carrying loads or lifting.
- Exercise caution when climbing, bending or working around machinery or equipment.
- Use all step stools safely.
- Use seat belts whenever operating a vehicle.
- Promptly clean up all spills.
- Wear proper Personal Protective Equipment (PPE) as required for the volunteer duties you are performing.

Pets

For the comfort and safety of our fellow co-workers, volunteers are not permitted to bring animals on Company property with the exception of service animals for individuals with disabilities. For approval of service animals, please contact Human Resources.

Smoking

GOBHI's is a smoke free workplace. Smoking is not permitted in the workplace, or in vehicles transporting members. Those who wish to smoke must comply with the Oregon Indoor Clean Air Act, also known as the Smoke free Workplace Law.

GOBHI Drug-Free Workplace Policy Statement and Purpose

- A. In compliance with the Drug-Free Workplace Act of 1988, Greater Oregon Behavioral Health, Inc. (GOBHI) has a longstanding commitment to provide a safe, quality-oriented and productive work environment. Alcohol, marijuana, and drug abuse poses a threat to the health and safety of GOBHI employees and to the health and safety of our members. For these reasons, GOBHI is committed to the elimination of drug, marijuana, and alcohol use and abuse in the workplace.

Definitions

- A. **Company premises:** Includes all buildings, offices, facilities, grounds, parking lots, lockers, places and vehicles owned, leased or managed by GOBHI or any site on which the company is conducting business including remote home offices.
- B. **Illegal drug:** A substance whose use or possession is controlled by federal law but that is not being used or possessed under the supervision of a licensed health care professional. (Controlled substances are listed in Schedules I-V of 21 C.F.R. Part 1308.)
- C. **Refuse to cooperate:** To obstruct the collection or testing process; to submit an altered, adulterated or substitute sample; to fail to show up for a scheduled test; to refuse to complete the requested drug testing forms; or to fail to promptly provide specimen(s) for testing when directed to do so, without a valid medical basis for the failure. Employees who leave the scene of an accident without justifiable explanation prior to submission to drug and alcohol testing will also be considered to have refused to cooperate and will automatically be subject to discharge.
- D. **Under the influence of alcohol:** An alcohol concentration equal to or greater than .04, or actions, appearance, speech or bodily odors that reasonably cause a supervisor to conclude that an employee is impaired because of alcohol use.
- E. **Under the influence of drugs and/or marijuana:** A confirmed positive test result for illegal drug and/or marijuana use per this policy. In addition, it means the misuse of legal drugs (prescription and possibly OTC) when there is not a valid prescription from a physician for the lawful use of a drug in the course of medical treatment (containers must include the patient's name, the name of the substance, quantity/amount to be taken and the period of authorization).

Procedure

A. Employee Assistance

1. GOBHI will assist and support employees who voluntarily seek help for drug, marijuana, or alcohol problems before becoming subject to discipline or termination under this or other GOBHI policies. Such employees will be allowed to use accrued paid time off, placed on leaves of absence, referred to treatment providers and otherwise accommodated as required by law. Employees may be required to document that they are successfully following prescribed treatment and to take and pass follow-up tests if they hold jobs that are safety-sensitive or require driving, or if they have violated this policy previously. Once a drug test

has been initiated under this policy, unless otherwise required by the Family and Medical Leave Act or the Americans with Disabilities Act, the employee will have forfeited the opportunity to be granted a leave of absence for treatment, and will face possible discipline, up to and including discharge.

2. Employees should report to work fit for duty and free of any adverse effects of illegal drugs, marijuana, or alcohol. This policy does not prohibit employees from the lawful use and possession of prescribed medications. Employees must, however, consult with their doctors about the medications' effect on their fitness for duty and ability to work safely, and they must promptly disclose any work restrictions to their supervisor.

B. Work Rules

1. Whenever employees are working, are operating any vehicle for GOBHI business, are present on GOBHI premises or are conducting company-related work off-site, they are prohibited from:
 - a. Using, possessing, buying, selling, manufacturing or dispensing an illegal drug (to include possession of drug paraphernalia).
 - b. Being under the influence of alcohol, marijuana, or an illegal drug as defined in this policy.
 - c. Possessing or consuming alcohol and marijuana.
2. The presence of any detectable amount of any illegal drug, illegal controlled substance or alcohol in an employee's body system, while performing company business or while in a company facility, is prohibited.
3. GOBHI will also not allow employees to perform their duties while taking prescribed drugs or prescribed marijuana, that are adversely affecting their ability to safely and effectively perform their job duties. Employees taking a prescribed medication must carry it in a container labeled by a licensed pharmacist or be prepared to produce the container if asked.
4. Any illegal drugs or drug paraphernalia will be turned over to an appropriate law enforcement agency and may result in criminal prosecution.

C. Required Testing

1. **Reasonable suspicion**
 - a. Employees are subject to testing based on (but not limited to) observations by at least two members of management of apparent workplace use, possession or impairment. HR, the supervisor or an executive leadership team member should be consulted before sending an employee for testing. Management must use the Reasonable Suspicion Observation Checklist to document specific observations and behaviors that create a reasonable suspicion that an employee is under the influence of illegal drugs, marijuana, or alcohol. Examples include:
 - a. Odors (smell of alcohol, body odor or urine).
 - b. Movements (unsteady, fidgety, dizzy).
 - c. Eyes (dilated, constricted or watery eyes, or involuntary eye movements).

- d. Face (flushed, sweating, confused or blank look).
 - e. Speech (slurred, slow, distracted mid-thought, inability to verbalize thoughts).
 - f. Emotions (argumentative, agitated, irritable, drowsy).
 - g. Actions (yawning, twitching).
 - h. Inactions (sleeping, unconscious, no reaction to questions).
- b. When reasonable suspicion testing is warranted, both management and HR will meet with the employee to explain the observations and the requirement to undergo a drug and/or alcohol test within two hours. Refusal by an employee will be treated as a positive drug test result and will result in immediate termination of employment
 - c. *Under no circumstances will the employee be allowed to drive himself or herself to the testing facility. A member of management must transport the employee or arrange for a cab and arrange for the employee to be transported home.*

D. Post-accident

1. Employees are subject to testing when they cause or contribute to accidents that seriously damage a vehicle while driving for GOBHI business, machinery, equipment or property or that result in an injury to themselves or another employee requiring off-site medical attention. A circumstance that constitutes probable belief will be presumed to arise in any instance involving a work-related accident or injury in which an employee who was operating a motorized vehicle) is found to be responsible for causing the accident. In any of these instances, the investigation and subsequent testing must take place within two hours following the accident, if not sooner. Refusal by an employee will be treated as a positive drug test result and will result in immediate termination of employment.
2. *Under no circumstances will the employee be allowed to drive himself or herself to the testing facility. A member of management must transport the employee or arrange for a cab and arrange for the employee to be transported home.*

E. Collection and Testing Procedures

1. Employees subject to alcohol testing will be transported to a GOBHI-designated facility and directed to provide breath specimens. Breath specimens will be tested by trained technicians using federally approved breath alcohol testing devices capable of producing printed results that identify the employee. If an employee's breath alcohol concentration is .04 or more, a second breath specimen will be tested approximately 20 minutes later. The results of the second test will be determinative. Alcohol tests may, however, be a breath, blood or saliva test, at the company's discretion. For purposes of this policy, test results generated by law enforcement or medical providers may be considered by the company as work rule violations.
2. Applicants and employees subject to drug or marijuana testing will be transported to a GOBHI-designated testing facility and directed to provide urine specimens. Applicants and employees may provide specimens in private unless

they appear to be submitting altered, adulterated or substitute specimens. Collected specimens will be sent to a federally certified laboratory and tested for evidence of marijuana, cocaine, opiates, amphetamines, PCP, benzodiazepines, methadone, methaqualone and propoxyphene use. (Where indicated, specimens may be tested for other illegal drugs.) The laboratory will screen all specimens and confirm all positive screens. There must be a chain of custody from the time specimens are collected through testing and storage.

3. The laboratory will transmit all positive drug test results to a medical review officer (MRO) retained by GOBHI, who will offer individuals with positive results a reasonable opportunity to rebut or explain the results. Individuals with positive test results may also ask the MRO to have their split specimen sent to another federally certified laboratory to be tested at the applicant's or employee's own expense. Such requests must be made within 72 hours of notice of test results. If the second facility fails to find any evidence of drug use in the split specimen, the employee or applicant will be treated as passing the test. In no event should a positive test result be communicated to GOBHI until such time that the MRO has confirmed the test to be positive.

F. Consequences

1. Employees who refuse to cooperate in required tests or who use, possess, buy, sell, manufacture or dispense an illegal drug in violation of this policy will be terminated. If the employee refuses to be tested, yet the company believes he or she is impaired, under no circumstances will the employee be allowed to drive himself or herself home.
2. Employees who test positive, or otherwise violate this policy, will be subject to discipline, up to and including termination. Depending on the circumstances, the employee's work history/record and any state law requirements, GOBHI may offer an employee who violates this policy or tests positive the opportunity to return to work on a last-chance basis pursuant to mutually agreeable terms, which could include follow-up drug testing at times and frequencies determined by GOBHI for a minimum of one year but not more than two years as well as a waiver of the right to contest any termination resulting from a subsequent positive test. If the employee either does not complete the rehabilitation program or tests positive after completing the rehabilitation program, the employee will be immediately discharged from employment.
3. Employees will be paid for time spent in alcohol or drug testing and then suspended pending the results of the drug or alcohol test. After the results of the test are received, a date and time will be scheduled to discuss the results of the test; this meeting will include a member of management and HR. Should the results prove to be negative, the employee will receive back pay for the times/days of suspension.

G. Confidentiality

1. Information and records relating to positive test results, drug and alcohol dependencies, and legitimate medical explanations provided to the MRO will be kept confidential to the extent required by law and maintained in secure files

separate from normal personnel files. Such records and information may be disclosed among managers and supervisors on a need-to-know basis and may also be disclosed when relevant to a grievance, charge, claim or other legal proceeding initiated by or on behalf of an employee or applicant.

H. Inspections

1. GOBHI reserves the right to inspect all portions of its premises for drugs, marijuana, alcohol or other contraband. All employees, contract employees and visitors may be asked to cooperate in inspections of their persons, work areas and property that might conceal a drug, marijuana, alcohol or other contraband. Employees who possess such contraband or refuse to cooperate in such inspections are subject to appropriate discipline, up to and including discharge.

I. Crimes Involving Drugs

1. GOBHI prohibits all employees, including employees performing work under government contracts, from manufacturing, distributing, dispensing, possessing or using an illegal drug in or on company premises or while conducting company business. GOBHI employees are also prohibited from misusing legally prescribed or over-the-counter (OTC) drugs. Law enforcement personnel may be notified, as appropriate, when criminal activity is suspected.
2. GOBHI does not desire to intrude into the private lives of its employees but recognizes that employees' off-the-job involvement with drugs and alcohol may have an impact on the workplace. Therefore, GOBHI reserves the right to take appropriate disciplinary action for drug use, sale or distribution while off company premises. All employees who are convicted of, plead guilty to or are sentenced for a crime involving an illegal drug are required to report the conviction, plea or sentence to HR within five days. Failure to comply will result in automatic discharge. Cooperation in complying may result in suspension without pay to allow management to review the nature of the charges and the employee's past record with GOBHI. *Please refer to the "Driving for GOBHI Business" policy in this handbook.*

J. Enforcement

1. The HR director is responsible for policy interpretation, administration and enforcement.

Solicitation and Distributions

Volunteers are prohibited from soliciting for membership, pledges, subscriptions or any unauthorized purpose or the unauthorized collection of money during the working time of the person doing the solicitation and the person to whom it is directed. "Working time" is time when the volunteer is expected to work, and does not include meal periods, rest breaks, and other times when the volunteer is not on duty.

You are prohibited from distributing or circulating materials or petitions of any kind or nature in working areas except as required in the performance of your job. Unauthorized solicitation, distribution or circulation of any material on Company property by non-employees is prohibited at all times.

Emailing Electronic Protected Health Information

Whenever possible, the encryption enabled email system shall be used when transmitting electronic protected health information (EPHI). Any uploading or downloading of EPHI shall be done over secure and encryption enabled lines using secure transfer protocols (i.e. the Secure File Transfer Protocol or SFTP).

Media Inquiries

To maintain a positive and consistent reputation with our members and to ensure all information is accurate, all media inquiries intended for response by GOBHI should be directed to the CEO, Communication Coordinator or the CEO's designee. The GOBHI logo is property of GOBHI and cannot be used without written permission. Please contact the Communications department for details.

Mandatory Reporting

Volunteers have a responsibility to report suspected abuse. Volunteers having reasonable cause to believe that any child, person who is elderly or dependent, individual with a mental illness or developmental disability, or resident of a nursing home or other health care facility has suffered abuse are required to report by telephone to the local office of the Oregon Department of Human Services or to a law enforcement agency within the county the person making the report is located at the time of his/her contact. The report is required by ORS 430.743 (Abuse Report). You can call 1-855-503-SAFE (7233). This toll-free number allows you to report abuse or neglect of any child or adult to the Oregon Department of Human Services.

VOLUNTEER INFORMATION

Position Description

We will provide you a written volunteer position description. We made every effort to place you in an assignment matching your abilities and interests. The position description is used to support any liability or injury coverage GOBHI may provide for you. If there is a significant change in your assignment, let the NEMT Support Specialist know, so they can create an updated position description.

Volunteer Supervision, Support and Training

You will work closely with the NEMT Support Specialist and the NEMT Credentialing and Grievance Specialist.

The NEMT Support Specialist is your primary contact and will:

- Provide you with onboarding and orientation;
- Reach out to you to schedule rides;
- Inspect your vehicle or walk through a virtual inspection with you;
- Provide you with any other support needed.

The NEMT Credentialing and Grievance Specialist will:

- Help you stay current with required training;
- Help you with any extraordinary issues during a trip;
- Keep all required documentation in a secure location.

If you feel you need help or support during your volunteer time, please reach out. If your key contacts are not available, ask for the Supervisor or Manager.

Reporting Requirements

You are required to record your information online to report your time and mileage. The NEMT Support Specialist can help you with this. It is very important to report your time by the 1st and 16th of each month. You must also report your miles if driving is one of your duties. You cannot be reimbursed if you do not report your miles.

Reimbursement

Mileage and meal costs may be reimbursed for volunteers who transport members. Ask the NEMT Support Specialist for details on how to do this. Keep a copy of your monthly report.

Volunteers should complete reimbursement reports within 60 days of incurring the expenses.

Publicity Releases

GOBHI may want to use your name, photograph or quotes in GOBHI publicity. The agency may request that you sign the release form in order to do this. The NEMT Support Specialist may use these in any form of publicity with your signed consent. You may withdraw your consent, in writing, at any time. Contact Human Resources to withdraw your consent.

Trip Assignments

The NEMT Support Specialist will assign you trips. It is your decision to accept or decline trips. If you accept a trip, then realize you cannot do the trip:

- Let the NEMT Support Specialist know as soon as possible.
- Please give enough notice so we can contact another volunteer or reschedule.

If the NEMT Support Specialist is unavailable, contact the NEMT Supervisor.

Boundaries Policy

If you have any questions about the following policy information or need clarification, please reach out to the NEMT Support Specialist or Credentialing and Grievance Specialist.

As a Driver for EOCCO/GOBHI's NEMT,

Professional conduct is expected as follows:

- Represent EOCCO/GOBHI in a professional manner at all times,
- Be respectful to all members, staff, & provider offices you come in contact with,
- Delete/destroy member information after services are completed,
- Report all issues and concerns to GOBHI as soon as possible.

Prohibited conduct:

- Enter a member's home, room or hotel room – even if invited,
- Help a member get ready for transport (dressing, shoes, jacket),
- Transfer a member between bed and wheelchair, or wheelchair and van,
- Help a member with any personal needs during your ride,
- Ask for or accept fares or tips,
- Solicit or sell any other products or services,
- Make any stops, pick up food or help run errands,
- Share a member's information other than allowed by HIPAA regulations,
- Discuss a member's service other than allowed by HIPAA regulations,
- Change the arranged pick up time of rides without prior documented permission from EOCCO or GOBHI.

You may not:

- Engage in personal contacts outside of NEMT trips like asking a member out on a date or seeing them socially in any capacity. If they initiate this type of contact, respond that this is not allowable and inform the NEMT Support Specialist immediately.
- You may not use the member's phone number for any other personal reason, nor go by their home for any reason other than to pick them up and return them to their scheduled rides.
- Ask a member to pay for any of your personal expenses. This includes gas, hotel room, food, etc. If a member offers to pay, you may not accept their offer. If you find yourself in a situation where you need help with any of these expenses – call the brokerage.
- Keep a member's phone number, address, or any of their personal information in your phone. You are required to delete the number after completing the trip. If you print this information, you must shred it. This is protected information and you should not ever store it in any capacity.
- Engage in conversation with a member about religion or politics. Engage with member about their health conditions.

Violating any of the above will cause loss of your volunteer position.

Members Responsibilities:

- Treat drivers and other passengers with respect at all times,
- Inform NEMT of any medical symptoms that may be contagious,
- Call NEMT as early as possible to schedule, change, or cancel a ride,
- Use seatbelt(s) and other safety equipment as required by law (example; car seats),
- Members know drivers can only make stops that GOBHI has approved.

Trips for Maintaining Boundaries

If you find yourself stuck because of a highway closure, bad weather, or any circumstance that does not allow you to keep the trip:

- Call the brokerage to let them know you are stuck. If you or the member need help to pay for expenses, ask the brokerage.
- Do not ask a member for help to pay expenses. Do not pay for a member's expenses. Call the brokerage and ask for help.
- Do not enter the member's hotel room, even if invited. Instead, offer to call the member in their room.

If the member is making you feel unsafe:

- Call the brokerage and let us know,
- Let us know if you feel that law enforcement needs to be involved,
- If you don't feel safe transporting the member back from an appointment, call the brokerage and we will make other arrangements.

If a member is trying to engage you in conversation about politics, religion or a topic that makes you uncomfortable:

- Tell the member, "As your driver, I am not allowed to discuss this topic. We do that to make sure everyone's views are respected. Instead, let's talk about... have you ever been to (name a place; or what is your favorite foods, etc.)"

NEMT Volunteer Driving Policy

All volunteers driving a personal vehicle for any GOBHI related business shall maintain a valid driver's license, insurance, and must operate the vehicle in a safe manner at all times following all driving laws and regulations.

I. Standards

1. Volunteer driving records must remain within GOBHI insurance carrier's guidelines for continued assignments in positions with driving duties. Volunteers who do not maintain acceptable records will not be allowed to drive their personal vehicle on GOBHI business.
 - a. Volunteer driving records will be requested annually.
 - b. Initial driving records will be reviewed prior to any GOBHI driving assignment.
2. All volunteers driving on GOBHI business must maintain a valid driver's license and insurance on all vehicles they drive for GOBHI assignments. Any change in the status of their driver's license or insurance must be reported to their supervisor immediately and

- prior to driving on GOBHI business.
- a. Insurance coverage on vehicles must meet the Oregon Division of Motor Vehicles state requirements. It is recommended that you contact your insurance agent to ensure proper insurance coverage for transporting members as a volunteer.
 3. A volunteer's private vehicle insurance serves as primary coverage with GOBHI's insurance being secondary. GOBHI's insurance would be excess only for liability. Physical damage to a volunteer's vehicle while driving on official GOBHI business, is not covered by GOBHI's insurance.
 4. The personal vehicle used must be properly maintained and in safe mechanical condition as required by law. Volunteer personal vehicles must meet NEMT contract requirements and pass required inspections.
 - a. GOBHI must conduct a vehicle inspection prior to a volunteer using the vehicle for a GOBHI assignment.
 - b. GOBHI will conduct vehicle inspections at regular intervals, and after any accident.
 5. The driver and all passengers must wear seat belts at all times. No vehicle should be operated when the number of occupants exceeds the number of passenger restraints available.
 6. Child restraint law: (effective July 1, 2007) Child passengers must be restrained in the approved child safety seats until they weigh 40 pounds. Infants must ride rear-facing until they reach both 1 year of age and 20 pounds. The child's care provider must install and secure child safety seats.
 7. Volunteer drivers may not install child safety seats and/or booster seats.
 8. Booster seat law: (effective July 1, 2007) Children over 40 pounds must use boosters to 4'9" tall unless they have reached age 8.
 9. Children younger than age 13 always should ride in the backseat.
 10. Drivers shall obey all applicable traffic and parking regulations, ordinances, and laws.
 11. Volunteers who incur parking or other fines while on GOBHI business are personally responsible for payment of such fines.
 - a. Volunteers who are issued citations for any offense while driving on GOBHI business must notify their supervisor immediately when practicable, but in no case later than 24 hours. Failure to provide such notice may prevent future voluntary assignments.
 - b. A volunteer who is arrested for or charged with a motor vehicle offense for which the punishment includes suspension or revocation of the motor vehicle license while on GOBHI business, must notify their supervisor when practicable, but in no case later than 24 hours. Conviction for such offense may be grounds for loss of privilege to transport GOBHI members.
 12. Any driver who is involved in a motor vehicle accident while on GOBHI business involving personal injury to any party shall notify their supervisor immediately. If the accident involves property damage only, the driver shall notify their supervisor as soon as possible. In either case an accident report must be completed with photos of property/vehicle damage and submitted to GOBHI no later than 24 hours after the

accident. *Please refer to “GOBHI Drug-Free Workplace” policy regarding drug testing requirements if applicable.*

The mileage rate is full reimbursement for the cost of operating the vehicle, including fuel, maintenance, repairs and both liability and comprehensive insurance.

Authorized Passengers

Volunteer drivers may transport only members listed on the “manifest” (list of daily trips). If the member has a friend or family member who wants to ride along, you must get prior authorization from GOBHI. The transportation dispatcher must also know about the change. If you find yourself in a questionable situation at the time of pickup, call GOBHI immediately.

Authorized Trips

You are authorized only to take members to and from the appointments listed on the manifest or Transportation Request forms. Exceptions may include stops related to medical appointments, but members must always call the local brokerage or the NEMT Support Specialist for prior authorization.

Check with the NEMT Support Specialist about unrelated stops, such as shopping for groceries. These must be authorized in advance by the caseworker and agreed to by you. NOTE: Mileage for these stops may or may not be reimbursable. Please check with the NEMT Support Specialist.

Approved Driving Course

Volunteers who transport members in their own cars must take an approved driving course within 90 days of placement as a volunteer driver. The NEMT Support Specialist will provide information on the appropriate driving course.

ACKNOWLEDGMENT OF RECEIPT OF VOLUNTEER DRIVER GUIDEBOOK

I acknowledge that I have received a copy of the Greater Oregon Behavioral Health, Inc. Volunteer Driver Guidebook. I understand that this guidebook contains important information on GOBHI's policies and my rights and responsibilities as a volunteer of the organization. I will familiarize myself with the material in the guidebook.

I understand that this guidebook supersedes all prior handbooks, manuals, policies, summaries and understandings on these subjects, that it is not intended as a complete statement of my rights or responsibilities, AND THAT IT IS NOT A CONTRACT OF EMPLOYMENT. I understand and agree that I am a VOLUNTEER motivated by charitable considerations, and I am providing services to GOBHI and its members without expectation of compensation of any kind. I also understand that GOBHI reserves the right to change, substitute, discontinue, interpret and apply, in its sole judgment, all GOBHI policies and procedures.

Volunteer Signature and Date