



Student/Instructor Orientation Manual

Welcome to Infirmary Health! We are glad you have chosen us for your education experience. As a valuable member of the healthcare team, we want you to be familiar with our philosophy, corporate compliance, infection control and patient safety processes contained in the manual.

Table of Contents

Our Journey Today	5
Core Values	5
Excellent Service	5
Patient Safety	5
Infirmary Health Error Prevention Toolkit	6
Explanation of Safety Behaviors	6
Pay Attention to Detail	6
Communicate Clearly	6
Hand-Off Effectively	7
Speak Up for Safety.....	7
Got Your Back.....	7
DUO (Do Unto Others)	8
Compliance Program	8
Corporate Compliance	8
Benefits of the Compliance Program	8
Monitoring and Auditing.....	8
Compliance Office and Committees	8
Effective Lines of Communication	9
Applicable Laws and Regulations	9
Medicare Regulations	9
The Federal False Claims Act.....	9
Stark Act	9
Anti-Kickback Statutes	9
Sections of the Social Security Act.....	9
Mail and Wire Fraud Statutes	9
State of Alabama Statutory References.....	9
Business Standards	10
Conflicts of Interest.....	10
Protection of Infirmary Health Assets.....	10
Use of Electronic Media	10
Professional Standards.....	11
Clinical Practices	11
Medical Ethics	11

EMTALA.....	11
HIPAA	11
Patient Rights	12
Disclosure and Informed Consent.....	13
Advance Directives.....	13
Access to Emergency Service Prudent Layperson.....	13
Respect, Safety and Nondiscrimination	13
• Patients have the right to safety and security (environmental safety, infection control, security).....	13
• All patients have the right to fair and equal delivery of healthcare services regardless of race, ethnicity, national origin, religion, political affiliation, level of education, place of residence or business, age, gender, marital status, personal appearance, mental or physical disability, sexual orientation, genetic information and source of payment. .	13
Grievances.....	14
Patient Care and Protection	14
Developmentally Appropriate Care	14
Under Joint Commission standards, a provider is competent in providing developmentally appropriate care if he or she can:	14
• Determine a patient’s status, taking into account the patient’s chronological age.....	14
• Identify a patient’s needs, taking into account the patient’s chronological and developmental age	14
• Provide care appropriate to a patient’s age and developmental needs	14
Cultural Competence	14
Examples of culturally competent care	14
Care and Sensitivity of the Bariatric Patient	14
Restraint and Seclusion	14
Medical and Surgical Restraint	14
• Restraint may be necessary to prevent a patient from removing or interfering with medically necessary devices. Restraint used for medical or surgical reasons must:.....	14
– Help with medical healing.....	14
– Help treat medical symptoms.....	14
Patient Assault and Abuse in the Healthcare Setting	15
Dynamics of Abuse.....	15
• Domestic Violence: The victim is an adult or adolescent. In the majority of cases, the victim is a woman. The abuser is a person who is, was or wishes to be in an intimate relationship with the victim. In most cases, the abuser is a man.	15
• Elder Abuse and Neglect: Elders may be abused, neglected or exploited. This mistreatment may be physical, sexual, psychological or financial. The perpetrator may be a family member or other caregiver.....	15
• Child Abuse and Neglect: child abuse may be physical, emotional or sexual. Child neglect occurs when a child’s basic needs are not met.....	16

Identify Victims of Abuse 16

Some victims may not disclose abuse. Children most often do not disclose abuse or neglect. Therefore, know and screen for signs and symptoms of abuse and neglect. 16

Report 16

Infection Control..... 16

Healthcare-Associated Infection..... 16

Hand Hygiene..... 16

The single most important factor for preventing the spread of infection is proper hand hygiene. Hands should be washed or decontaminated before and after each direct patient contact. 16

- Soap and water 16
 - Must be used for visibly soiled hands..... 17
 - All surfaces of the hands must be cleaned including palms and fingertips 17
 - The entire process from beginning to end requires at least 60 seconds..... 17
 - Hands must be washed for a minimum of 15 seconds..... 17
- Alcohol foam 17
 - Rub on all surfaces of the hands and wrists until hands are dry 17
 - May be used up to 10 times before washing hands with soap and water 17

Note: hand rubs should not be used if hands are visibly soiled or if patient has Clostridium difficile. 17

Skin Care – hand creams to minimize the occurrence of irritant contact dermatitis are recommended. Hand lotions should not contain petroleum jelly or other emollients which may affect the integrity of gloves. Only approved hand lotion may be used and is available to all hospital personnel from the purchasing department. 17

Environmental Hygiene..... 17

Invasive Procedures 17

Antibiotic Use: Antibiotic Resistance 17

Reduce the risk of health care–associated infections 18

Precautions to Prevent Spread of Infection 18

Bloodborne Pathogens..... 18

Airborne Diseases 18

Personal Responsibility as Part of the Healthcare Team 19

Safety and Security 21

To report emergencies..... 21

Emergency Codes..... 21

Safety Data Sheets (SDS)..... 21

Life Safety (Fire) 21

Medical Gases 22

Equipment Safety..... 22

Safety Inspection Program..... 22

Radiation Safety 22

Radioactive Materials 23

MRI Safety..... 23

Ergonomics..... 23

Back Safety 23

Lifting and Transporting Patients..... 23

Slips, Trips and Falls 24

Latex Allergy..... 24

Hazard Communication 24

Wireless Transmitter and Cellular Phone Use 25

Security and Workplace Violence 25

 General Safety/Security Information 25

 What not to do..... 25

Anti-harassment..... 25

Workplace Violence 26

Reporting Incidents 26

Student/Instructor – Specific Information 26

 Dress Policy 26

 Tobacco-free Workplace 27

 Parking 27

 Solicitation 27

Our Journey Today

Our Mission is **LIFE**

Our Vision is to be “The **FIRST CHOICE** for healthcare in our region”

Our Values are **L**eadership, **I**ntegrity, **F**amily and **E**xcellent Service

To be the **FIRST CHOICE** for healthcare means we must offer the highest quality healthcare, the latest medical technologies and the cleanest and most up-to-date facilities, all delivered with caring and compassionate service to our patients and their families. When we accomplish these goals, we will have earned the designation as our area’s **FIRST CHOICE** for healthcare.

Core Values

Leadership - Setting the example

Integrity - Doing the right thing

Family - Supporting each other along the way

Excellent Service - Exceeding our customers’ expectations

Excellent Service

Effectively meets/exceeds the customer’s needs through compassionate service-oriented actions; everyone is our customer.

- Smiles and greets every customer
- Demonstrates a can-do attitude
- Strives to do the job right the first time
- Anticipates the customer’s needs
- Handles problems, doesn’t pass them off
- Displays enthusiasm
- Listens to all customers
- Takes responsibility, makes the situation right
- Protects confidentiality
- HCAHPS – Hospital Consumer Assessment of Healthcare Providers and Systems

Patient Safety

At Infirmary Health, we are committed to a reliable culture of safety and to the elimination of preventable harm. With this commitment comes a set of expected behaviors to prevent errors. It takes everyone working together.

Infirmary Health Error Prevention Toolkit

I commit to the following.....Safety Behavior Expectations	By Practicing the Following Error Prevention Tools
Pay Attention to Detail	<ul style="list-style-type: none"> • Self-checking using STAR Stop Think Act Review
Communicate Clearly	<ul style="list-style-type: none"> • 3-Way Repeat Back & Read Back • Phonetic & Numeric Clarifications • Ask Clarifying Questions
Hand-off Effectively	<ul style="list-style-type: none"> • Use SBAR to handoff: Situation Background Assessment Recommendation
Speak up for Safety	<ul style="list-style-type: none"> • Question & Confirm • Escalate Safety Concerns when necessary by saying “Before we go further....I need some clarity”
Got Your Back!	<ul style="list-style-type: none"> • Cross Check • Coach Each Other

Explanation of Safety Behaviors

Pay Attention to Detail

- a. Focus our attention before we act
- b. This will help to
 - i. Avoid unintended slips or lapses
 - ii. Reduce the chance of error when we’re under time pressure or stress
- c. Error Prevention Tool: STAR
 - i. Stop: pause for 1 to 2 seconds to focus attention on the task at hand
 - ii. Think: visualize the act and think about what is to be done
 - iii. Act: concentrate and perform the task
 - iv. Review: check for the desired result

Communicate Clearly

- a. Ensure we hear things correctly and understand things accurately
- b. This will help to prevent wrong assumptions and misunderstandings that could cause us to make wrong decisions
- c. Error Prevention Tools
 - i. 3-Way Repeat Backs & Read Backs

1. Sender initiates communication using receiver's name. Sender provides an order, request, or information to receiver in a clear, concise format.
2. Receiver acknowledges receipt by a repeat-back of the order, request, or information.
3. Sender acknowledges the accuracy of the repeat-back by saying, "That's correct." If not correct, sender repeats the communication.
 - a. Ask Clarifying Questions. Phrase your questions in a manner that will give an answer that improves your understanding of the information.

Hand-Off Effectively

- a. Handoff patients or tasks by giving appropriate information and ensuring understanding and ownership.
- b. This will help ensure that complete and accurate information about the patient, project or task is communicated when responsibility transfers from one individual to another.
- c. Error Prevention Tool: **SBAR**
 - i. **Situation:** the bottom line (Who/What you're calling about, the immediate problem, your concerns)
 - ii. **Background:** what you know (review of pertinent information: environment, procedures, patient condition, employee status)
 - iii. **Assessment:** what is happening now (Your view of the situation: "I think the problem is". Urgency of action, "The situation is deteriorating rapidly – we need to do something.")
 - iv. **Recommendation:** what is next? (Your suggestion to or request of the other person)

Speak Up for Safety

- a. Act on a responsibility to protect in a manner of mutual respect – assert and escalate the problem.
- b. This will help to
 - i. Reduce the chance that we'll make a mistake in a high-risk situation
 - ii. Endure that work activities are stopped when uncertain and unsafe conditions are identified
- c. Error Prevention Tool: Question and Confirm
- d. Stop the Line for Safety: Anyone at Infirmary Health has the authority to stop the line any time an immediate threat (real or perceived) to patient or staff safety is identified.
 - i. The goal is to make a quick and specific request to stop any action (procedure or process) and reassess the situation so that everyone is on the same page before continuing.
 - ii. Stopping the line should always be done in a calm and respectful voice, "Before we go further, I need some clarity."

Got Your Back

- a. Always help others and expect that they will always help you. Monitor the actions of other team members for the purpose of sharing the workload and reducing or avoiding errors.
- b. **This should be done**
 - i. to help maintain situation awareness
 - ii. as a way of "watching each other's back"
 - iii. to keep a colleague from being unsafe
- c. Error Prevention Tool: Cross Check and Coach Each Other

Cross Check – Two people working together is always safer than one person working independently

Coach Each Other – provide positive feedback when you see someone doing something safe or

practicing any of the Safety Behaviors. Then if you have to nudge someone in a different direction because they are not practicing the safety behaviors they will not be as offended if you have given them positive feedback in the past. A good coach is someone who always helps others reach their goal. Our goal is achieving a culture of safety. Be a good coach.

DUO (Do Unto Others)

- Customer service is based on the **customer's** perception of the service they received, not our perception of the service we provided.
- **DUO** is the customer service model that will be used throughout Infirmary Health.
- **Do Unto Others** is the focus, which our society recognizes as the Golden Rule.



"Do unto others as you would have them do unto you."

Compliance Program

Corporate Compliance

Infirmary Health's Business and Professional Standards of Conduct provide guidance for us in the workplace. These Standards apply to every person associated with Infirmary Health. We are obligated to understand and obey these Business and Professional Standards of Conduct. If you are faced with an uncomfortable situation that may not be described, let fairness and respect for others guide your actions.

Benefits of the Compliance Program

The compliance program helps us meet regulatory requirements by detecting and preventing fraud, waste and abuse. The compliance program helps Infirmary Health:

- Avoid submission of false claims to federal programs;
- Show we care about ethical and legal conduct;
- Detect, prevent and correct potential problems;
- Encourage staff to report concerns to their supervisor or to the Compliance Hotline if necessary;
- Avoid financial loss to the government and taxpayers.

Monitoring and Auditing

Internal and external audits are performed for operational and compliance purposes. Regular periodic audits focus on high-risk areas. Potential Consequences of Noncompliance:

- Criminal fines;
- Civil damages;
- Jail time;
- Individual and hospital exclusion from Medicare or other government programs.

Compliance Office and Committees

- Danny Harrison: Mobile Infirmary, J.L. Bedsole Rotary Rehabilitation Hospital, Infirmary Long Term Acute Care Hospital, Infirmary Hospice Care, Infirmary 65 and Infirmary Medical Clinics
- Amy Bennett: Thomas Hospital, Thomas Medical Center, North Baldwin Infirmary, Oakwood Center for Living and Infirmary-Eastern Shore

Effective Lines of Communication

Lines of communication must be open and effective to support the compliance program. Open communication increases the ability to identify problems early and promptly correct them. The Infirmary Health compliance hotline number is 251-435-2006. This line provides employees an additional avenue to voice a concern reported in good faith about a potential compliance issue.

Applicable Laws and Regulations

Medicare Regulations

- Meet standard for quality of care
- Not bill Medicare for items and services without clear and accurate documentation of medical necessity
- Not bill for items and services that were not provided
- Not participate in kickback activities that increase utilization of health care goods and services
- Follow other rules for claims and billing

The Federal False Claims Act

This act makes it illegal to submit a falsified bill to a government agency (such as Medicare). It is the policy of Infirmary Health that its affiliates, employees, contractors and agents adhere to the statutory requirements of federal and state False Claims Acts.

Stark Act

This act makes it illegal for a physician to refer patients to facilities or providers if the physician or a member of his or her immediate family has a financial relationship with the facility or provider.

Anti-Kickback Statutes

This statute makes it illegal to offer or receive kickbacks, bribes or rebates for items or services that will be paid for by a government healthcare program.

Sections of the Social Security Act

The Social Security Act makes it illegal for hospitals to knowingly pay physicians to encourage them to limit services to Medicare or Medicaid patients and to offer gifts to Medicare or Medicaid patients to get their business.

Mail and Wire Fraud Statutes

These statutes make it illegal to use the U.S. Mail or electronic communication as a part of a plan to defraud (such as making a fraudulent bill to Medicare). Penalties include fines of up to \$250,000 and up to 30 years in jail.

State of Alabama Statutory References

Alabama Code Section 22-1-11 prohibits both the making of intentionally false statements in claims for medical benefits from the Medicaid Agency and the giving of anything of value to a recipient as an inducement to purchase any goods or services reimbursable by the Medicaid Agency or to refer persons to sellers of such goods or services. Violations are punishable by criminal and civil fines and penalties.

Business Standards

Conflicts of Interest

A “conflict of interest” happens when personal interests come before the interests of Infirmary Health. We are not allowed to use our positions for personal gain at the facilities’ expense. If you are not sure about a situation that may seem like a conflict of interest, ask your instructor or contact Infirmary Health’s Office of Internal Audit.

Some examples of conflicts of interest are:

- Accepting anything of value that may be looked upon as an attempt by the offering person/vendor to receive special treatment. Any small gifts or favors must be unsolicited from other parties and happen only rarely. Accepting expensive gifts, lodging or entertainment because of your position with Infirmary Health may be perceived as a bribe.
- Creating business relationships with suppliers or independent contractors for personal reasons. Business decisions should be made on the ability of that vendor/contractor to meet the needs of Infirmary Health. Vendors listed by the federal government as ineligible to participate in federally funded programs will not be allowed to do business with Infirmary Health.

Protection of Infirmary Health Assets

We should treat system property and equipment with respect. The use of supplies, tools or facilities for personal use is not allowed. Students/staff members may not remove or borrow company property without permission.

Use of Electronic Media

Infirmary Health provides internet access to its employees and students as a means to provide open and timely communication. These work tools should be used in a professional manner for job-related functions and education. Infirmary Health will only use legally licensed software. The use of pirate or unlicensed software is not acceptable. All information contained or sent via electronic media is considered the property of Infirmary Health.

The following are some basic principles regarding social networking:

- Do not transmit or place online individually identifiable patient information.
- Observe ethically prescribed professional patient-student boundaries.
- Understand that patients, colleagues, institutions and potential employers may view postings. If noted, you should bring content that could harm a patient’s privacy, rights or welfare to the attention of the proper authorities.
- Make it your business to know the policies of the institutional governing online conduct.
- Remember that standards of professionalism are the same online as in any other circumstance.
- Do not share or post information or photos gained through the nurse-patient relationship.
- Maintain professional boundaries in use of electronic media. Online contact with patients blurs this boundary.
- Do not make disparaging remarks about patients, employers or co-workers, even if they are not identified.
- Do not take photos or videos of patients on personal devices, including cell phones.
- Promptly report a breach of confidentiality or privacy.

Professional Standards

- Infirmory Health is committed to preserving the rights of others.
- We encourage and expect patients to participate in healthcare decisions.
- It is our obligation to protect all patient medical information and to provide access to that information upon patient request.
- We are committed to the protection of personal, employment and financial information regarding our employees and facilities.
- We all have the right to a harassment-free setting. Our organization supports a cooperative, professional environment.
- As we are faced with our daily tasks, clear communication among us is critical. We must be able to resolve differences and work together as a team to reach our goals. We appreciate the diversity of our workforce and respect the individuality of each person.
- We strive to do things fairly, ethically and legally in treating people fairly. Infirmory Health will protect each person from punishment or harassment for identifying misconduct. No action will be taken or threatened against a student for filing a complaint or disclosing information. Remember, this protection does not apply to individuals reporting conduct in which they are involved. Not complying with the Business and Professional Standards of Conduct can lead to disciplinary action, including the possible termination of clinical access.
- We are obligated to promote a positive, ethical work environment for ourselves and others who come in contact with Infirmory Health. Each of us should take the responsibility of asking questions, seeking guidance and expressing concerns of compliance with these Business and Professional Standards of conduct. The simple formula to ensure compliance on any issue is to stop, think and clarify.

Clinical Practices

Medical Ethics

The basic concepts of medical ethics are:

- Healthcare providers have a duty to promote good, act in the best interest of their patients and act in the best interest of society as a whole
- To protect the patient's ability to make informed decisions about his/her own care
- To be fair to the community as a whole
- To protect and promote the fair distribution of healthcare resources
- Patient-Provider Relationship:
 - Be professional and responsible in the care of patients
 - Treat patients with compassion and respect
 - Maintain appropriate boundaries with patients
 - Maintain patient confidentiality

EMTALA

Under EMTALA (Emergency Medical Treatment and Active Labor Act), all hospitals that participate in Medicare must provide emergency services to all patients, whether or not they can pay.

HIPAA

The Health Insurance Portability and Accountability Act requires healthcare providers to follow standards for performing electronic transfers, security of health information, privacy of health information and identifiers for employers. (See details of confidentiality listed under Patient Rights).

Patient Rights

Confidentiality, HIPAA and HITECH

- Patients have the right to privacy and confidentiality
- A patient's medical record may be shared with
 - Clinicians directly involved in the patient's case
 - Regulatory agencies looking into a facility's quality of care
 - People with a legal or regulatory right to see the records
- Protected healthcare information may not be shared with ANYONE else without valid authorization by the individual who is the subject of the disclosure

Each of us must maintain complete confidentiality regarding all information learned in the hospital setting.

Any information learned through your clinical experience with the system should be shared only with those who have an official need to know. Just because someone is employed by Infirmiry Health does not authorize them to have access to protected clinical information unless it is required as part of their job. Improperly using and disclosing confidential patient information can subject you to expulsion from Infirmiry Health facilities and/or substantial civil and criminal penalties.

Infirmiry Health Maintenance of Confidentiality Policy, along with the Confidentiality Pledge, prohibits individuals from obtaining or disclosing confidential employee, financial and protected patient health information.

Protect the confidential nature of patient information by first considering how appropriate a location might be for a necessary conversation regarding a patient (whether named or described). Consider for example, the risk to confidentiality if such a conversation was held in a hallway, elevator, cafeteria, or even in a nursing station where visitors might easily overhear.

When an exchange of confidential information is necessary, maintain only a comfortable voice volume required to allow the person with whom you are speaking to hear you. Loud talkers cause a breach in confidentiality more often than they might imagine.

Make sure you know the person with whom you are sharing information and verify their right to have access to the patient data. Above all, please remember that disclosing confidential patient information (whether verbal, hard copy or electronic) without proper authorization can lead to civil and criminal penalties including fines, imprisonment and loss of current/future employment.

The Health Information Technology for Economic and Clinical Health (HITECH) section of the "stimulus package" passed in 2009 authorizes greater criminal enforcement authority against anyone who wrongfully obtains or discloses protected health information. In addition, many disclosures to the wrong person must now be reported to the individual who was the subject of the inappropriate disclosure. In significant wrongful disclosures that involve more than 500 individuals, a healthcare provider is required to report the breach to local news media and the Department of Health and Human Services (HHS). It is extremely important not to participate in activities that are considered "snooping" around in health records because, even though accessing information might not be intended to be malicious, the action can, and already has, led to criminal prosecution. The goal of Infirmiry Health is to avoid disclosures to anyone who is not authorized to receive the data or does not have an official need to know.

If you become aware of potential breaches of confidentiality, you should report the occurrence to your clinical coordinator or contact the HIPAA Hotline:

Mobile Infirmery: 251.435.3900

North Baldwin Infirmery or Thomas Hospital: 251.279.1021

Information about HIPAA and how it affects you can also be reviewed on the Infirmery Health Intranet site by clicking on “Compliance-HIPAA-HITECH.”

Disclosure and Informed Consent

- Patients have the right to know their diagnosis, prognosis and treatment options
- Patient participation in treatment decisions
 - For each treatment option, the patient needs to know the risks, benefits and potential medical consequences

Advance Directives

An Advance Directive is a legal document that helps protect the patient’s right to make decisions about care when they are no longer able to communicate those decisions. There are two types of advance directives:

- **Living Will** – a legal document that records which types of medical care a patient does or does not want at the end of life
- **Durable Power of Attorney for Healthcare** – also called Medical Power of Attorney. It is a legal document that gives a representative the power to make healthcare decisions for the patient

Joint Commission requires that accredited hospitals must:

- Have and use consistent policies for advance directives
- Give all adults written information about their right to accept or refuse treatments
- Provide equal access to care for all patients, whether or not they have an advance directive
- Allow patients to review and revise their advance directives
- Make sure appropriate staff members know about each patient’s advance directive
- Help patients write advance directives or refer patients to sources of help, if requested
- Allow healthcare professionals to honor advance directives within the limits of the law and the capacities of the hospital
- Document and honor patient wishes for organ donation, within the limits of the law and the capacities of the hospital

Access to Emergency Service Prudent Layperson

Patients have the right to emergency medical treatment. Patients and insurance companies disagree about the need for emergency care. To solve this problem, insurance companies must use a standard definition for the need for ER services. This definition uses the idea of a “prudent layperson.” Under this definition, a person has the need for ER services if she or he has the symptoms that a reasonable non-medical person would consider an emergency.

Respect, Safety and Nondiscrimination

- Patients have the right to safety and security (environmental safety, infection control, security).
- All patients have the right to fair and equal delivery of healthcare services regardless of race, ethnicity, national origin, religion, political affiliation, level of education, place of residence or business, age, gender, marital status, personal appearance, mental or physical disability, sexual orientation, genetic information and source of payment.

Grievances

- Patients have the right to complain about the quality of their healthcare. When complaints cannot be resolved quickly and easily, patients have the right to file a grievance.

Patient Care and Protection

Developmentally Appropriate Care

Under Joint Commission standards, a provider is competent in providing developmentally appropriate care if he or she can:

- Determine a patient's status, taking into account the patient's chronological age
- Identify a patient's needs, taking into account the patient's chronological and developmental age
- Provide care appropriate to a patient's age and developmental needs

Cultural Competence

Cultural competence means providing medical care in a way that takes into account each patient's values, beliefs and practices. Culturally competent care promotes health and healing.

Examples of culturally competent care include:

- If a patient values spirituality, find a way to integrate spiritual and medical practices for healing
- If a family elder must participate in all medical decisions in a patient's culture, be certain to involve the elder in the care of the patients

Care and Sensitivity of the Bariatric Patient

As caregivers it is our duty to provide sensitive care to our bariatric patients. The caregivers should demonstrate the following principles when caring for the bariatric patient:

- Each patient's physical and emotional needs should always be at the forefront
- Empathy is critical
- Support and encouragement is essential
- Communication and listening skills are imperative

Restraint and Seclusion

Non-Violent

Medical and Surgical Restraint

- Restraint may be necessary to prevent a patient from removing or interfering with medically necessary devices. Restraint used for medical or surgical reasons must:
 - Help with medical healing
 - Help treat medical symptoms
- Medical/Surgical restraint may be used only:
 - In response to dangerous behavior on the part of the patient, or
 - As a component of planned care or an approved protocol
- Restraint may be initiated only upon the order of a Licensed Independent Practitioner (LIP)
- At regular intervals, qualified staff must assess restrained patients:
 - To evaluate the continued need for restraint
 - To ensure overall physical and mental well-being of the patient
 - To assess cardiopulmonary status for variances
- As long as restraint is clinically justified, the LIP must examine the patient at least once a day and

then must renew the original order for restraint

- Use of restraint must be documented in the medical record

Violent

- A restraint or seclusion is applied as an emergency measure in a crisis-situation when unanticipated severely aggressive, violent or destructive behavior places the patient or other in imminent danger.
- Work toward preventing, reducing or eliminating the use of behavioral healthcare restraint and seclusion:
 - Use only in crisis situations
 - Intervene early to prevent development of a crisis situation
 - Whenever possible, use non-physical methods to deal with behavioral problems
 - Release patients from restraint/seclusion as soon as they meet established behavioral criteria
- Restraint or seclusion must be ordered by an LIP
 - Orders must be issued on a case-by-case basis
 - Orders are to be time-limited
 - PRN orders are NOT acceptable
- A patient placed in restraint or seclusion must be monitored for health and safety
 - At least every 15 minutes, the patient must be assessed for physical/psychological status and assisted with needs as appropriate for the type of restraint/seclusion used
 - Assess cardiopulmonary status for variances
- Patients must be reevaluated to determine whether restraint/seclusion is still appropriate and necessary, and to help the patient regain control. At each evaluation, the LIP or healthcare staff must:
 - Help the patient to regain control
 - Reevaluate the need for restraint/seclusion
 - Issue a new order for restraint/seclusion (LIP), or consult with LIP to request a new order (healthcare staff) as needed
 - Restraint/seclusion must be documented in the medical record

Patient Assault and Abuse in the Healthcare Setting

Patient abuse by a healthcare provider is a breach of medical ethics. Assault and abuse are also crimes. These crimes are punishable by imprisonment and fines. Patients may also be abused outside the healthcare setting. As part of the healthcare team, you are in a unique position to help identify victims of abuse.

Joint Commission requires that accredited facilities educate staff on the dynamics of abuse; establish criteria for identifying victims of abuse, assault and neglect; assess identified victims of abuse; maintain a current list of relevant agencies and resources to refer victims; and report abuse and neglect according to state and local law.

Dynamics of Abuse

- Domestic Violence: The victim is an adult or adolescent. In the majority of cases, the victim is a woman. The abuser is a person who is, was or wishes to be in an intimate relationship with the victim. In most cases, the abuser is a man.
- Elder Abuse and Neglect: Elders may be abused, neglected or exploited. This mistreatment may be physical, sexual, psychological or financial. The perpetrator may be a family member or other caregiver.

- Child Abuse and Neglect: child abuse may be physical, emotional or sexual. Child neglect occurs when a child's basic needs are not met.

Identify Victims of Abuse

Some victims may not disclose abuse. Children most often do not disclose abuse or neglect. Therefore, know and screen for signs and symptoms of abuse and neglect.

Some Symptoms of Possible Abuse are:

- Emotional abuse: often found in the form of depression. Symptoms may include headaches, backaches, fatigue and insomnia
- Physical abuse: bruises or burns, injuries in concealed or multiple sites; implausible story
- Behaviors: victim is quiet and submissive, not talking in presence of abuser. Abuser may hover over victim; abusers may be reluctant to leave

The assessment should document or preserve evidence of the abuse.

- Elder Abuse and Neglect – evaluate the patient's:
 - Access to healthcare
 - Cognitive status
 - Emotional status
 - Overall health and functional status
 - Social and financial status
- When child abuse is suspected:
 - Perform a thorough pediatric health assessment
 - Interview the parents and the child

Report

Most states require healthcare providers to report certain cases of domestic violence. Many states require healthcare providers to report known or suspected elder abuse and neglect. All states require healthcare providers to report suspected child abuse and neglect.

In the event you become aware of any of the above, immediately contact your instructor or preceptor.

Infection Control

Healthcare-Associated Infection

Healthcare-Associated Infection (HAI) is an infection that develops after contact with the healthcare system. These infections may come from environmental sources (dust, etc.), patients, staff members, students or hospital visitors. People can be sources of HAI if they are carriers of a disease, are incubating a disease or if they are actively ill with a disease.

Best practices for preventing HAI are related to hand hygiene, environmental hygiene, invasive procedures, antibiotic use, bloodborne pathogens, airborne precautions, contact precautions, droplet precautions, personal protective equipment and personal responsibility.

Hand Hygiene

The single most important factor for preventing the spread of infection is proper hand hygiene. Hands should be washed or decontaminated before and after each direct patient contact.

- Soap and water

- Must be used for visibly soiled hands
- All surfaces of the hands must be cleaned including palms and fingertips
- The entire process from beginning to end requires at least 60 seconds
- Hands must be washed for a minimum of 15 seconds
- Alcohol foam
 - Rub on all surfaces of the hands and wrists until hands are dry
 - May be used up to 10 times before washing hands with soap and water

Note: hand rubs should not be used if hands are visibly soiled or if patient has *Clostridium difficile*.

Skin Care – hand creams to minimize the occurrence of irritant contact dermatitis are recommended. Hand lotions should not contain petroleum jelly or other emollients which may affect the integrity of gloves. Only approved hand lotion may be used and is available to all hospital personnel from the purchasing department.

Environmental Hygiene

- Maintain a visibly clean environment (no visible dust or soiling)
- Clean, disinfect or sterilize medical equipment after each use
- Dispose safely of medical waste
- Launder used and contaminated linens safely and effectively
- Follow appropriate guidelines for kitchen and food hygiene
- Maintain adequate pest control program.

Invasive Procedures

- The most common type of HAI is urinary tract infection associated with indwelling urinary catheters.
- High-risk procedures such as catheterization should be performed only when absolutely necessary.
- Catheters should be removed as soon as possible
- Instruments used for invasive procedures should be properly sterilized after use. They should be used with aseptic technique.
- Prevention of bloodstream infection is another area that requires clinical focus
- Use aseptic technique when inserting IV or changing dressings
- Thoroughly clean hub of IV tubing before accessing.

Antibiotic Use: Antibiotic Resistance

- The more antibiotics are used, the more common resistant strains of bacteria are identified. Example: MRSA (methicillin-resistant *Staphylococcus*), VRE (vancomycin-resistant *Enterococci*), DRSP (drug-resistant *Streptococcus*, pneumonia and MDR-TB (multidrug-resistant *Mycobacterium tuberculosis*) and *Acinetobacter baumannii*)
- Healthcare professionals must take an active role in preventing the spread of antibiotic resistance
- Diagnosing and treating infections effectively: use of broad-spectrum or multiple antibiotics should be avoided.
- Preventing spread of infection: hand hygiene and use of appropriate isolation precautions.
- Educate patients on ways to prevent the spread of infections
- Using antibiotics prudently: patients should be educated regarding this (i.e. not demand antibiotics for viral illnesses such as cold, flu, etc.).

Reduce the risk of health care–associated infections

Comply with either the current Centers for Disease Control Prevention (CDC) hand hygiene guidelines. Wash hands with soap and water when visibly soiled. Use hand-sanitizing agents routinely. Perform hand hygiene before and after contact with patient or their environment. No artificial fingernails.

Prevent infections from Multidrug Resistant Organisms (MRSA, VRE, CDIFF, etc.). Apply consistent hand hygiene and environmental hygiene. Implement Isolation Precautions. Prescribe and administer antibiotics appropriately. Educate patients on prevention strategies.

Prevent Central Line Associated Bloodstream Infections. Use aseptic technique when inserting and accessing lines. Wear maximum barrier precautions when inserting central lines and follow standardized insertion protocols. Avoid insertion into the femoral vein unless other sites are unavailable. Use antiseptic skin preparation for insertion. Disinfect hubs and ports before accessing. Educate patient and family about bloodstream infection prevention. Discontinue device as soon as it is no longer needed.

Prevent Surgical Site Infections. Administer antibiotics appropriate for procedure within one hour prior to incision. Discontinue antibiotics within 24 hours after surgery end time. Control postoperative blood glucose. Remove hair only if needed by clipping. Insert urinary catheter only if needed for the procedure and remove on postoperative day 1 or 2. Maintain perioperative normothermia. Educate patients and family about infection prevention.

Prevent Indwelling Catheter-Associated Urinary Tract Infections (CAUTI). Limit the use and duration of indwelling catheters to situations necessary for patient care. Use aseptic insertion techniques. Manage according to evidence-based guidelines.

Precautions to Prevent Spread of Infection

Standard Precautions should be used in the care of all patients regardless of their diagnosis.

Bloodborne Pathogens

- Spread from person to person as a result of unprotected exposure to infected blood, other body fluids, non-intact skin, and moist body tissues. Bloodborne diseases include AIDS, Hepatitis B and Hepatitis C.
 - Handwashing
 - Barriers (gloves, gowns, mask and eye protection) are used depending on the task performed and the likelihood of exposure to a patient's body fluids
- Needlestick Prevention
 - Use of safer needle devices
 - Contaminated needles and other contaminated sharps' containers
 - For more information, contact 435-2293

Airborne Diseases

- Are produced when an infected person sneezes, coughs or talks. The particles can remain suspended in air for long periods of time and can travel long distances. Important diseases include: chickenpox, measles, tuberculosis, SARS and smallpox.
- Precautions:
 - Patients are placed in isolation rooms with special air handling and ventilation systems (negative pressure)

- Healthcare staff must wear personal respirators whenever they enter an airborne isolation room.
- Patient transport should be limited as much as possible
- Patient should wear a regular mask if removed from room

Contact Precautions/Strict/Enteric

- Occurs via direct or indirect person-to-person contact. This form of transmission is the most important and common cause of Hospital Acquired Infections (HAI). Examples of contact disease are MRSA, VRE, Hepatitis A, respiratory syncytial virus (RSV), impetigo, conjunctivitis, viral hemorrhagic infections and many others.
- Precautions:
 - Patients are isolated in private rooms or cohorted
 - Healthcare staff must use gloves and gowns when entering room or whenever they are in contact with the patient or their environment. Hands should be decontaminated immediately after removing gloves or other personal protective equipment (PPE). PPE should be removed before leaving patient's room.
 - Patient transport should be limited as much as possible
 - Patient equipment
 - Non-critical equipment should be dedicated to a single patient (e.g. thermometers, stethoscopes)
 - If this is not possible, equipment should be cleaned and disinfected between patients (e.g. glucose monitors)

Droplet Precautions

- Transmission happens via large respiratory droplets. The droplets are generated during coughing, sneezing, talking, etc. and travel short distances (up to three feet). Droplet diseases include mumps, rubella, influenza and many others.
- The differences between airborne and droplet transmission:
 - Tiny respiratory particles (airborne) vs. larger respiratory droplets (droplet)
 - Long distance travel (airborne) vs. short travel distance (droplet)
- Precautions
 - Patients should be isolated in private rooms or cohorted
 - Regular isolation masks should be worn when entering patient's room or working within three feet of patient
 - Patient transport should be limited as much as possible

Personal Protective Equipment

- Prevents the spread of infection
 - from patient to healthcare provider
 - from healthcare provider to patient
- Equipment
 - Includes gloves, masks, goggles, gowns, respirators
 - Refer to specific category of precautions for instruction on which equipment to use

Personal Responsibility as Part of the Healthcare Team

- Maintain immunity to vaccine-prevented diseases
- Report all unprotected exposures (such as accidental needlesticks)
- Stay home when you are sick

Do You Know the Color?				
Bag Color	Mobile Infirmary	Thomas Hospital	North Baldwin Infirmary	Infirmary Long Term Acute Care
Red	To collect infectious waste such as dressings and disposable supplies contaminated with blood and body fluids. To collect items that have patient identifiers.	Same	Same	Same
White/White bag with blue writing	Soiled linen	Regular trash	Non-infectious waste	Non-infectious waste
Clear with Biohazard Symbol	To return articles/equipment uses in isolation and/or contaminated with body fluids to Central Processing; and for transporting contaminated specimen containers	For transporting contaminated specimen containers		
Black	Dietary waste. To collect items that have patient identifiers.	Same	Same	Same
Clear	Non-infectious waste, linen	Non-infectious waste trash		
Yellow	Chemo waste	Same		
Blue	Damaged linens. To collect items that have patient identifiers	Same		
Gray			Soiled linen	
Green	Recycle	Same	Same	Same

Safety and Security

To report emergencies:

- Infirmory Health clinics/facilities not located within a hospital – call 911
- Mobile Infirmory Health – call 88 or 435.3560
- J.L. Bedsole Rotary Rehabilitation Hospital – call 88 or 435.3560
- Infirmory Long Term Acute Care Hospital – call 88
- North Baldwin Infirmory – call 87 after three beeps dial “00” to make the announcement
- Thomas Hospital – call 88
- Colony Rehabilitation Hospital – call 88

Emergency Codes

- **The following codes are used at all Infirmory Health facilities:**

Code Green – contaminated patient. Isolate. Notify. Decontaminate.

Code Gray – security situation. Contact security. De-escalate. Contain.

Active Shooter – assess, shelter, evacuate, take action, notify

Code Purple – severe weather

Code Orange – external/internal disaster (mass casualty)

Code Yellow – facility lockdown

Code Red – fire

I.T. Outage – Notify department head. Use downtime procedures

Code Black – bomb threat

Code Adam – infant abduction

Code White – hostage situation

- **The following codes are used for medical emergencies**

Code Blue – Mobile Infirmory, North Baldwin Infirmory, Thomas Hospital, Long Term Acute Care Hospital and J.L. Bedsole Rotary Rehabilitation Hospital, Colony Rehabilitation Hospital

Code Blue Neonatal – for neonatal medical emergencies at Mobile Infirmory and Thomas Hospital

Code Blue Pediatric – for pediatric medical emergencies at Thomas Hospital

Safety Data Sheets (SDS)

- Found on Infirmory iNET
- If you need assistance accessing the iNET, please speak with your preceptor, team leader or manager
- CD backup

Life Safety (Fire)

Best defense against fire is prevention:

- Tobacco Free policies should be followed (All Infirmory facilities and grounds are smoke-free)
- Hallways should not be blocked with equipment, supplies, etc.
- Fire doors should not be blocked and will automatically close when the fire alarm sounds
- Portable medical gas cylinders should be secured at all times and stored appropriately
- All equipment should be inspected prior to use
- Med Sleds are available for non-ambulatory patients

If you have a fire in your area, remember “**RACE**”

R – Remove or Rescue – Remove or rescue all patients from the immediate area of the fire

A – Alarm or Alert – Give the alarm or alert by:

- Calling out for help
- Using a manual pull station alarm
- Activate emergency response by dialing your facility's code

C – Confine or Contain – Confine or contain the fire by closing the door to the room where the fire started

E – Extinguish or Evacuate - If the fire is small enough to put out with a single portable extinguisher, attempt to extinguish. Use the PASS protocol:

- **P** – Pull the pin
- **A** – Aim the nozzle at the base of the fire
- **S** – Squeeze the trigger
- **S** – Spray in a sweeping motion

Otherwise, prepare to **evacuate** patients to a safe area.

Medical Gases

- Oxygen is available in all patient care areas
- Oxygen shut-off (zone valves) are located at each nursing unit. The valves are labeled to indicate the rooms they serve
- The following staff are authorized to turn off medical gas in an emergency situation at Mobile Infirmery, North Baldwin Infirmery, Thomas Hospital and Infirmery Long Term Acute Care Hospital:
 - Plant Operations
 - Nurses
 - Respiratory Therapists
- Ensure O₂ tanks are stored in an upright position in appropriate containers

Equipment Safety

Most equipment in the healthcare setting is electric. This means there is a risk of electrical shock. Electrical devices which are likely to come in contact with patients must be equipped with three-prong plugs or rated as double-insulated.

- Remove and report electrical hazards
- Use electrical equipment properly
- Check to make sure equipment has been inspected within the date as specified on the inspection

Safety Inspection Program

All electrical devices entering the hospital should receive an initial safety inspection. Incoming equipment includes:

- Patient-owned devices: Patients may bring in personal appliances in all areas except intensive care units and telemetry units
- Other outside devices: This category includes borrowed units, rentals, demonstration equipment and equipment brought in for evaluation. Such devices should be processed through the receiving department before they are delivered to any other department.

Inspected equipment will have a white, orange or green safety inspection label attached to it. It is very important that the label on patient-care devices include dates within the last year. Do not use electrical equipment near patients unless it has an inspection label dated within the last year. Call the electronics (or bio med) department if you need assistance in determining whether a device has been inspected.

Radiation Safety

Limit exposure to radiation

- Time: minimize the amount of time you are exposed

- Distance: maximize your distance from the radiation source
- Shielding: use appropriate shielding to absorb the energy of radioactive particles

Radioactive Materials

Areas where radioactive materials are located will be identified with the universal radioactive symbol. Only Authorized personnel shall enter an area where radioactive materials are located. Refer to the radiation safety policy for additional information.

MRI Safety

Hazards can arise when certain items enter the MRI system. Patients should be screened prior to MRI to ensure they do not have MRI-unsafe implants or embedded objects; and do not have metallic objects in their pockets.

- Implanted or embedded ferromagnetic objects (aneurysm clips) will try to align with the magnetic field which can cause damage to soft tissues
- Pulsed radio frequency fields in the MRI system can produce electric currents in metal implants or monitor cables resulting in burns
- Electronic devices (such as pacemakers) can fail

Ergonomics

Ergonomics means designing work equipment and tasks to fit the “natural laws” of the human body.

Ergonomics best practices are:

- Avoid fixed or awkward postures
- Avoid lifting without using proper devices or equipment
- Avoid highly repetitive tasks
- Avoid forceful exertions
- Provide support for you limbs
- Use proper posture and body mechanics when sitting, standing or lifting
- Keep tools close to you to avoid reaching, twisting and bending
- Use supportive equipment and ergonomic tools (e.g. wrist supports for keyboards)
- Respond promptly to aches and pains. This can help you address slight injuries before they become severe or debilitating

Back Safety

- Healthcare is a high-risk setting for back pain and injury. Healthcare workers who lift and move patients are at especially high risk for injury.
- Injury may be prevented through:
 - Proper care and operation of the spine
 - Proper posture
 - Regular exercise

Lifting and Transporting Patients

- General Lifting Techniques
 - Get the load close
 - Use a diagonal lift (one foot in front of the other)
 - Lock the back in
 - Push the load up with the hips and legs

- Keep your head and shoulders back (eyes on the horizon)
- Never jerk and twist
- Before lifting a patient, the patient should be assessed to determine how to do the transfer safely
 - Determine appropriate method for the transfer
 - Determine appropriate equipment to use
- Determine how many staff members are needed

Slips, Trips and Falls

- Keep floor clean and dry
 - Choose slip resistant shoes
- Look for:
- Soft rubber soles
 - A large amount of surface area in contact with the floor (i.e. no heels)
 - Patterned soled that increase friction
- Post safety signs around slip hazards
 - When conditions are hazardous (wet floors), avoid slipping or falling by walking like a duck
 - Keep your feet flat and slightly spread apart
 - Point your toes slightly outward
 - Take slow, short steps
 - Make wide turns at corners
 - Keep your arms at your sides

Latex Allergy

- Latex allergy is becoming more and more common. Most reactions to latex are mild but some can be life threatening
 - Make sure that patients are screened for latex allergies
- Anyone who is allergic to latex should avoid latex products
 - Do not use any latex products, including latex cleaning gloves in the patient's room
 - If you are allergic to latex, use non-latex gloves only, use silk or plastic tape instead of adhesive tape and consult for latex-free cart

Hazard Communication

To protect healthcare workers from exposure to hazardous chemicals, the following groups of people have hazard communication duties:

- Manufacturers
 - Research, create and distribute SDS listing the specific hazards of the chemical
 - Label all containers of hazardous materials
- Employers
 - Maintain a file of SDS's for all hazardous chemicals used by workers
 - Inspect incoming chemicals to verify proper labeling
 - Train employees in the use of hazardous chemical
- Employees/students
 - Know which hazardous chemicals are used in their work area
 - Know how to access SDS
 - Read product labels carefully, follow all instructions and heed all warnings

Wireless Transmitter and Cellular Phone Use

It is inappropriate to use smart phones, cell phones, two-way radios or other electronic devices for personal communication, personal activity or any other personal endeavors while on duty.

Hand-Off Communication

Every student is required to hand-off patient care at the end of the clinical day by providing the patient's nurse with report of the patient's status, care provided and task to be completed. Communication with the patient's nurse before leaving the unit is imperative for patient safety and positive patient outcomes.

Security and Workplace Violence

General Safety/Security Information

The safety and security of Infirmiry Health employees, volunteers, contractors, students, patients and visitors is of vital importance. Ways you can assist with safety and security include:

- Wear your identification badge
- Park in designated areas
- Have the appropriate parking tag hanging from your rear view mirror
- Don't leave valuables unattended
- Be observant of your surroundings; promptly report suspicious activity to security
- Call security for an escort to your vehicle if you feel unsafe or need assistance
- Avoid construction areas when possible. These areas are clearly identified by yellow signs that are posted on the doors leading to these areas. Doors should remain closed at all times to prevent dust and other contaminants from coming in contact with patients, visitors and staff.

What not to do

- Do not let someone use your ID badge to enter the facility
- Do not smoke while on property
- Do not take property that doesn't belong to you
- Do not ignore suspicious behavior
- Do not obstruct a locked exit door to enable your re-entry or someone else's
- Do not bring friends or family to your work area or other areas that are not appropriate for visitors
- Do not visit other employees in their work areas where you are not assigned or do not have authorization to go

Anti-harassment

The term "harassment" includes

- Threats or promises
 - Threats of employment action or promises of employment action linked directly or indirectly (i.e. implied) to submission to
 - Sexual favors
 - Other verbal or physical sexual behavior(s)
- Unwelcome advances
 - Any unwelcome sexual advances, requests for sexual favors or verbal/physical conduct of a sexual nature that alters an employee's (or agent's) working conditions and creates an abusive relationship
- Other potential harassing actions
 - Other forms of intimidation, including racial, ethnic and age-based or disability harassment which

alters an employee's (or agent's) working conditions and creates an abusive work environment

Any form of harassment will not be tolerated. It is your responsibility to promptly report any behavior outlined above to your instructor and/or department manager.

Workplace Violence

Workplace violence is any violence committed in a work setting. To help keep the workplace safe from violence:

- Recognize aggressive behavior and warning signs of potential violence
- Respond appropriately to the level of aggressive behavior
 - Response to aggressive behavior of tension: Remain calm, listen and acknowledge the person's frustration. Try to resolve the problem
 - Response to aggressive behavior of disruptiveness: Set clear limits; remain calm and choose words carefully to avoid aggravating the situation; call security privately if the disruptive behavior continues
 - Response to aggressive behavior of loss of control: Remove yourself from the danger and get help. Do NOT try to restrain the person yourself.

Reporting Incidents

A breach in safety is referred to as an incident. Incidents happen when normal procedures are not followed, safety is compromised and injury (or near injury) occurs.

Common examples of incidents mentioned above are:

- Equipment malfunction
- Exposure to radiation
- MRI injury
- Latex allergic reaction
- Back injury
- Slip, trip or fall
- Exposure to hazardous chemicals
- Workplace violence

All incidents should be reported to your instructor and/or preceptor immediately.

Student/Instructor – Specific Information

Dress Policy

- Clinical students must wear the approved school uniform/scrubs
- Non-clinical students should follow business casual guidelines
 - Ladies should wear slacks or khaki pants with a blouse or polo shirt. Dresses or skirts are acceptable if they are of an appropriate length for the workplace.
 - Men should wear slacks or khakis pants and a button up or polo shirt. Shirt tails should be tucked in and slacks or pants worn at the natural waist.
 - No jeans, shorts, sweatshirts, t-shirts, or tank tops.
 - Clothing must be clean and your general appearance must be neat and professional.
 - School uniforms meeting the above guidelines are acceptable.

Tobacco-free Workplace

Infirmary Health maintains a tobacco-free work environment at all locations. As a student, you are prohibited from smoking or using tobacco products on any Infirmary Health property, owned and/or leased properties, buildings, parking lots and company vehicles. Each student should:

- Comply with policy guidelines
- Assist in ensuring compliance with fellow students
- Pay attention to personal hygiene. Having a strong odor of smoke/tobacco products while working is inappropriate.

Failure to comply with these provisions may result in disciplinary action.

Parking

Infirmary Health provides parking areas for students. The appropriate Infirmary Health department will issue parking decals for students who park at an Infirmary Health location. You are required to park in designated areas at each location. Persons who possess disability parking placards or license plates issued by the City may apply through the Protective Services or Security Department for a parking decal that allows parking in the designated handicap parking spaces.

Solicitation

Infirmary Health prohibits solicitation for and distribution of literature for non-Infirmary Health organizations or activities unless allowed and approved by the appropriate human resource department in accordance with the Solicitation/Distribution of Literature policy.