

PTM CMS Web Interface Contractor Handbook



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Effective Date

Effective December 2024, this CWI Contractor Handbook supersedes all prior handbooks, verbal communications, and memos which may have been issued on any subject addressed herein.

CONFIDENTIAL
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Introduction

Welcome to PTM!

We are pleased to provide you with this copy of our CMS Web Interface (CWI) Contractor Handbook. This Handbook will serve as a guide to the policies and practices governing your partnership with PTM. We encourage all our contractors to maintain open lines of communication, to assist us in developing better practices, policies and procedures and to aid PTM in whatever way you can help us achieve our goals and objectives. In turn, we will assist you in your efforts to better your skills and to find satisfaction in your duties and responsibilities.

As part of your role with PTM, you are expected to become familiar with the information in this Handbook and to observe PTM' policies and practices. Please see Section "Your Responsibility Regarding This Handbook" for some specific things you should do now. The following policies and practices set forth PTM' expectations for its Contractors. These guidelines may change from time to time, and as those changes occur; all contractors will be notified. It does not cover all situations that may arise, and any questions that you may have regarding wages, benefits, or other policies should be directed to the Director of Human Resources.

This Handbook is not a contract, and no contractor has a contractual right to any matters discussed in the Handbook.

Vickie Alexander
Chief Executive Officer

Handbook Contents and Revisions

This Handbook is provided as a description of generally accepted guidelines and common practices. Because it is not possible for us to foresee all situations that might arise, we reserve the right to deviate from the guidelines and practices outlined in this Handbook, if in our judgment, such deviation is warranted based on the facts of a particular situation.

No handbook can anticipate every circumstance or question. Accordingly, we may need to change the practices and guidelines described in this Handbook. We reserve the right to do so at our sole discretion. Revisions may include changing, rescinding, or adding to any procedures, benefits, or practices described in this Handbook. Revisions may be made without prior notice to contractors. It is your responsibility to keep your personal copy of the Handbook current by immediately inserting revisions when issued.

If other verbal or written communications issued before or after the distribution of this Handbook appear to change any of this Handbook's contents, the guideline(s) set forth in this Handbook will be considered the official position/practice of PTM until a written revision of the Handbook contents is issued.

Your Responsibility Regarding This Handbook

Contractors are expected to read, understand, and comply with the guidelines set forth in this handbook. To ensure you understand and use this handbook, please do the following now:

1. Make time promptly to carefully read this handbook.
2. Make notes of any policies that are not clear or raise questions.
3. Seek answers to questions as they arise.
4. Keep the handbook available electronically or physically at your work area, and make a habit of referring to it when you have questions or concerns.
5. Keep your Handbook current.

This handbook is the property of PTM and should not be provided to individuals who are not affiliated with the company, without permission of the Human Resources Department. Upon completion of the contractor relationship, you must delete it electronically or return any printed copies to the Human Resources Department or your supervisor along with all other PTM property before your final departure.

CMS Civil Rights Compliance Policy Statement

PTM fully endorses and supports the Centers for Medicare & Medicaid Services' (CMS) Civil Rights Compliance Policy Statement. Our policies are designed to fully comply with the Civil Rights Policy Statement. For your convenience and to promote your understanding of PTM' policy on civil rights, the substantive portions of CMS's Civil Rights Compliance Policy Statement are reproduced here:

CMS CIVIL RIGHTS COMPLIANCE POLICY STATEMENT

The Centers for Medicare & Medicaid Services' vision in the current Strategic Plan guarantees that all our beneficiaries will have equal access to the best health care. Pivotal to guaranteeing equal access is the integration of compliance with civil rights laws into the fabric of all CMS program operations and activities. I want to emphasize my personal commitment to and responsibility for ensuring compliance with civil rights laws by recipients of CMS funds. These laws include Title VI of the Civil Rights Act, as amended, Section 504 of the Rehabilitation Act, as amended, the Age Discrimination Act of 1975, as amended, the Americans with Disabilities Act of 1990, as amended, and Title IX of the Education Amendments of 1972, as well as other related laws. The responsibility for ensuring compliance with these laws is shared by all CMS operating components. Promoting attention to and ensuring CMS program compliance with civil rights laws are among the highest priorities for CMS, its employees, contractors, State agencies, health care providers, and all other partners directly involved in the administration of CMS programs.

CMS, as the agency legislatively charged with administering the Medicare, Medicaid and Children's Health Insurance Programs, is thereby charged with ensuring these programs do not engage in discriminatory actions on the basis of race, color, national origin, age, sex or disability. CMS will, with your help continue to ensure that persons are not excluded from participation in or denied the benefits of its programs because of prohibited discrimination.

To achieve its civil rights goals, CMS will continue to incorporate civil rights concerns into the culture of our agency and its programs, and we ask that all our partners do the same. We will include civil rights concerns in the regular program review and audit activities: collecting data on access to, and the participation of, minority and disabled persons in our programs; furnishing information to recipients and contractors about civil rights compliance; reviewing CMS publications, program regulations, directives and instructions to assure support for civil rights, and working closely with the Department of Health and Human Services (DHHS), Office for Civil Rights, to initiate orientation and training programs on civil rights. CMS will also allocate financial resources, to the extent feasible, to ensure equal access, to prevent discrimination, and to assist in the remedy of past acts adversely affecting persons on the basis of race, color, national origin, age, sex or disability.

CMS's mission is to assure health care security for the diverse population that constitutes our nation's Medicare and Medicaid beneficiaries, i.e., our customers. We will enhance our communication with constituents, partners and stakeholders. In so doing, we will seek input from health care providers, states, contractors, the DHHS Office for Civil Rights, professional organizations, community advocates and program beneficiaries. We will continue to vigorously assure that all Medicare and Medicaid beneficiaries have equal access to and receive the best health care possible, regardless of race, color, national origin, age, sex or disability.

HUMAN RESOURCES DEPARTMENT

The Human Resources Department plays a key role in PTM. One of its basic functions is to apply our policies and rules consistently.

Here are some of the areas in which Human Resources personnel can be of service:

- Attendance Records
- Changes in Personal Status
- Orientation Program
- PTM Rules and Policies

Payroll

For the 2024-2025 CWI season, Payroll will be managed via [JobFinders Employment services](#), that provides temporary staffing, career counseling, training and more for central Missouri businesses and organizations.

Contractors are paid on a weekly basis.

Direct deposit or use of a pay card is mandatory for all PTM contractors. A contractor must complete a Direct Deposit form upon start date or if, for some reason, not currently enrolled. Once completed, the contractor must submit the application to the Human Resources department for processing. Direct Deposit of the contractor's pay will begin the pay cycle following the acceptance of a properly completed application form and the successful processing of a test transaction through the banking system.

Use of direct deposit or pay card is a requirement of all contractors with PTM. Failure of a contractor to take reasonable steps to comply with this policy shall be deemed misconduct and will lead to disciplinary action according to PTM' discipline policy, which may include ending the contractor relationship.

Direct deposit advice will be available electronically.

End of CWI Program Evaluation

The CWI Program Manager or his/her designee will provide evaluations of CWI contractors at the end of the program. The purpose of this evaluation is to give these contractors feedback on their work, provide an opportunity to discuss their work, offer them improvement suggestions, and serve as a basis for decisions to have the contractors do CWI or other PTM work in the future.

Personal Use of PTM Property

PTM Property

Elsewhere in this handbook is a policy on confidentiality of information. It is important to note that confidentiality applies to all proprietary information and trade secrets owned by PTM. It is a requirement of all contractors that you may not use or disclose any proprietary information or trade secrets obtained during your work with PTM, except as is required to perform your job duties. Failure to follow this rule may result in corrective action, up to and including termination. If you ever have any questions about whether it is appropriate to disclose information, you must obtain authorization from your supervisor before the disclosure is made.

PTM Communication and Information Systems

Per the Electronic Communications Policy, which is incorporated herein, PTM maintains a number of Communication and Information Systems (PTM Communication and Information System or “PCIS”) which may include voicemail, electronic mail (E-mail), online chat, and collaboration systems. These systems are provided to assist in the conduct of business within PTM. All data stored, created, sent, and received on these systems are and remain at all times the property of PTM.

PTM reserves the right to retrieve and read any data stored on PCIS. Please note that even when a communication is deleted, it is still possible to recreate. Therefore, ultimate privacy of communications cannot be guaranteed to anyone.

PCIS may not be used for the conduct of personal business. Communications and messages should be limited as much as possible to the conduct of business of PTM.

While PCIS may use passwords or other security mechanisms, their reliability for maintaining confidentiality cannot be guaranteed. You must assume that any and all communications and content on PCIS may be read by someone other than the intended or designated recipient. Contractors may access only communications, messages, files, or programs, whether computerized or not, that they have permission to enter. Unauthorized review, duplication,

dissemination, removal, damage or alteration of files, passwords, computer systems or programs, messages, e-mails, or other property of PTM, or improper use of information obtained by unauthorized means, may be grounds for disciplinary action, up to and including termination.

Communications and messages may not contain content that may be reasonably considered offensive or disruptive to any contractor or employee. Offensive content includes but is not be limited to sexual comments or images, racial slurs, gender-specific comments, or any comments that would offend someone on the basis of his or her age, sexual orientation, religious or political beliefs, national origin, or disability.

Voice-mail users should include in their outgoing voice-mail message an instruction to “please leave a non-confidential message.”

Internet

Per the Electronic Communications Policy, usage of the Internet, World Wide Web, and PTM' networks for PTM business are for the benefit of PTM and its customers, vendors, and suppliers. This includes your PTM email address and system.

Acceptable Usage: Contractors accessing the Internet, World Wide Web, and/or PTM' networks for any PTM' business purpose or from any PCIS are representing PTM when doing so. Accordingly, all such communications should be for professional, business reasons and should not be for personal use. Each contractor is responsible for ensuring that they use PCIS in an effective, ethical and lawful manner. Social media, "chat rooms," forums or similar may be used to conduct official PTM business or to gain technical or analytical advice. Use of PCIS should be encrypted, when necessary, per the Electronic Communications Policy or the IT Security and HIPAA Compliance Policy.

Unacceptable Usage: Sending, saving, or reviewing offensive material is prohibited. Offensive material includes, but is not limited to, sexual comments, jokes or images, racial slurs, gender-specific comments or any comments, jokes or images that would offend someone on the basis of his or her age, disability, gender, race, religion, national origin, physical attributes, sexual preference, or any other classification protected by federal, state, or local law. Any use of PCIS to harass or discriminate is unlawful and strictly prohibited by PTM. Violators will be subject to discipline, up to and including immediate termination.

Each contractor is responsible for the content of all text, audio, or images that they place or send using or over PCIS. All messages communicated on the Internet using PCIS should have the contractor's name attached; messages may not be transmitted using someone else's name or under an assumed name. Contractors who wish to express personal opinions on the Internet should not use PCIS for that purpose.

To prevent computer viruses from being transmitted through the system, contractors are not authorized to download any software onto PTM' computers or computing devices or any storage in that device or other PTM-provided equipment. Contractors interested in obtaining software from the Internet should contact the PTM IT department. In addition, no contractor may load any software or install or alter any hardware on any PTM computer including laptops without permission. Only the PTM IT Department may authorize any deviation from this policy. Violations of this policy are considered very serious and will be subject to discipline, up to and including termination.

PCIS, the data stored on them and PTM' networks, and communications or messages using PCIS are and remain at all times the property of PTM. As such, all messages or communications created, sent, or retrieved using PCIS are the property of PTM, and should be considered public information. Employees have no right to privacy as to any information or file transmitted or stored through PCIS. PTM reserves the right to retrieve and read any message or file. PTM reserves the right to periodically review any contractor's "bookmarks" or "preferences" on PTM-provided equipment or technology. Contractors should be aware that, even when a message is erased or a visit to a Web site is closed; it is still possible to recreate the message or locate the Web site. Accordingly, Internet, electronic-mail and similar messages are considered a public communication, not private. Furthermore, all communications including text and images may be disclosed to law enforcement or other third parties without prior consent of the sender

or the receiver.

for any lost tools or equipment which have been issued to you unless there are extenuating circumstances which PTM approves. **You are expected to return all PTM tools and equipment to us prior to ending a contractor relationship.** Failure to do so could result in legal action against you by us or our customers as continued possession of PTM tools and equipment could be damaging to either party.

When taking tools or equipment to a customer site, be sure that you bring back the same item. Many tools become lost because they have been left at a customer site. If you damage any tools or equipment, immediately inform your supervisor so that repairs and/or replacement can be arranged.

Policies for Protection of Confidentiality

PTM contractors routinely come into contact with confidential information including Personal Health Information (PHI) and Personally Identifiable Information (PII). Therefore, we all share in the responsibility to protect this information. Equally important, violation of confidentiality subjects both the individual and the organization to liability which may include fines to the organization and fines and/or imprisonment for individual violators. Any violation is to be reported to the Chief Compliance Officer (CCO) or PTM employee coordinating your contractor assignments. The goal is to put such measures in place as to prevent the problem from recurring. For willful and purposeful violations of the Confidentiality Policy, administrative sanctions up to termination may be applied.

The overall rule of thumb is simple: **A contractor should assume PTM data, information, or material is confidential unless he/she knows with certainty it is not. Conversely, a contractor should never assume something is non-confidential.** It is imperative that PHI be kept in strictest confidence. Discussing or communicating it outside the organization is a violation of confidentiality. By the same token, the same care must be taken internally. The IT Security and HIPAA Compliance Policy which is incorporated herein, details many of PTM policies regarding IT Security and HIPAA compliance.

WHAT IS CONFIDENTIAL?

The general rule is that information is confidential which either explicitly or implicitly identifies an individual patient, practitioner, hospital, or contains PHI or PII. Explicit confidential information is reasonably clear. It has confidential information. Implicit is much trickier. For example, if data were released on a specific hospital that showed a pattern of confirmed quality problems for chemotherapy cases and only one oncologist was on staff at that hospital, it would be easy for a reporter to identify the physician responsible. When in doubt, contractors should always refer questions of confidentiality to their immediate supervisor who, if necessary, will discuss them with the Compliance Officer or other management, who have overall responsibility for assuring the protection of confidential information and proper release

of confidential and non-confidential information by PTM.

Most Violations of any rules listed above may result in disciplinary action up to and including termination. In addition, PTM may advise appropriate legal officials of any violations.

PTM Tools and Equipment

PTM property includes, but is not limited to, equipment, computers, tablets, cell phones, tools and supplies, and originals or copies of:

- Information stored electronically, on magnetic media or in digital form;
- Computer software;
- All written material;
- Work notes;
- Project plans;
- Lists of customer names, contacts, email addresses, and telephone numbers;
- Lists of potential customers;
- Technical papers and reports;
- Management reports;
- Proposals;
- PTM email addresses and telephone numbers;
- All magazines, journals, books, and other materials for which PTM paid;
- Business-related letters and technical brochures; and,
- Any and all other work which is the result of your work with us.

When using PTM tools and equipment you are expected to use such items with caution so as not to injure yourself or others. Also, you are expected to operate such items in accordance with the manufacturer's specifications so that the tools and equipment will not be damaged. When in doubt as to how to operate something, please refer to the manufacturer's User Manual, or ask your supervisor for assistance. Immediately inform your supervisor of any tool or equipment malfunctions.

In some cases, you may be assigned certain tools or equipment which are necessary to properly perform your job duties. You may be asked to sign for receipt of such items. You are financially responsible provider-specific information and PHI may be released only under specific procedures outlined in federal regulations or by PTM' customers. Safeguards have been developed to assure that release of information on specific providers or PHI is done responsibly. For example, the provider must be aware of plans to release information on his performance to a third party. Information collected as part of a "quality review study" (e.g., project data collection in Quality Improvement) is considered to be confidential. Disclosure of this category of information, including hospital- and other provider-specific data, is tightly restricted by government regulations. Therefore, unless the information has already been released publicly, the employee should assume it is confidential.

Aggregated performance data may still be confidential, if it is based on few observations. Do NOT assume that information is not confidential just because it has been aggregated.

Examples of data, reports, records, and materials that are confidential include, but are not limited to:

- electronic or paper medical records,
- completed internal worksheets,

- internal correspondence,
- any electronic material containing provider-specific information or PHI,
- any hard-copy reports containing the above,
- listings of patient information, and
- faxed or electronically communicated information relating to specific cases, containing information on provider performance or PHI.

SPECIFIC CONFIDENTIALITY RULES

At the completion of work, no confidential material or PHI of any kind should be left in an open area of a contractor's workspace whether at a PTM facility, a home office, or another location.

Electronic communications such as e-mail is not a secure means of data transfer. All electronic communications should be in accordance with the IT Security and HIPAA Compliance Policy.

Printed confidential information should be stored under lock and key. As circumstances dictate, this would involve the use of locked containers i.e. file cabinets and/or areas secured by a lock.

PCIS should be used and managed securely per the IT Security and HIPAA Compliance Policy. Key parts of that policy include that contractors should log off PCIS when not in use and at the end of each day. When applicable, PCIS automatically locks or logs off.

Passwords or another authentication are to be used to use PCIS and are to be changed regularly. PTM has an automated procedure that forces contractors to change their passwords while enabling them not to reuse the same password.

CWI contractors should NOT print, fax or store any information on a portable hard drive since all work is available electronically. If an exception is needed, contact your supervisor for instructions on how to manage and dispose of this material. If needed and approved:

- Confidential information must be appropriately secured and discarded in a manner that is not readable or decipherable.
- When faxing confidential information, you should use the fax transmission cover sheet stating that the information being transmitted is confidential and its use or dissemination by any person other than the intended recipient is prohibited. The appropriate fax cover sheet can be obtained from the Compliance Officer.
- Confidential data on a portable hard drive or similar must be encrypted using approved encryption obtained from or approved by the PTM IT Department.
- Confidential information mailed to or from other locations should be properly packaged.

Envelopes and other containers should consist of material and be in sizes and shapes that facilitate mail handling and prevent breakage. Packages must be properly sealed, and the tape used must be the type that cannot be torn. Packages to be mailed should be double-wrapped and should identify the material as confidential and clearly indicate who is authorized to open the package. At a minimum, confidential information should be sent via first class mail and deposited either in an official United States Post Office receptacle or delivered directly to a post office. The packages should not be placed in a private mailbox for pickup. If additional security is warranted, more restrictive mail service such as certified or registered mail should be used. Contractors should encourage providers to follow the same practices when mailing confidential

information to PTM.

Comparable security measures should be applied when transporting confidential information or PCIS. Material being transported by car should preferably be placed in the car's locked trunk and must never be left unattended when loading and unloading. Any vehicle containing confidential information or PCIS should be locked when unattended.

Contractors should report any suspected breaches of confidentiality to their supervisor immediately. The supervisor, in turn, will be responsible for reporting the violation to the appropriate management.

Software Copyright Policy

Most software packages purchased by PTM are copyrighted. Therefore, it is PTM's policy to reserve all software purchased by PTM to usage within PTM. Employees are not to make copies of computer software for their personal use or for any other illegal purposes; doing so could result in termination. CWI Contractors are also prohibited from placing non-PTM-owned software, including games, either on PTM networks or individual computers.

Code of Conduct Regarding Receipt of Gifts

A contractor of PTM shall not accept, solicit, or demand for his/her benefit anything of value from any person with the intent to influence any business or transaction of PTM. Therefore, all contractors of PTM are hereby prohibited from:

1. soliciting for themselves or for a third party anything of value from anyone in return for any business, service, or confidential information of PTM; and
2. accepting anything of value (other than normal authorized compensation) from anyone in connection with PTM business.

Exceptions to this prohibition are:

1. acceptance of gifts or favors based on obvious family relationships;
2. acceptance of meals, refreshments, or entertainment of reasonable value in the course of a meeting or other bona fide business discussion;
3. acceptance of loans from financial institutions with which we do business on customary terms to finance proper and usual activities of employees such as mortgage loans;
4. acceptance of advertising or promotional materials of nominal value, such as: pens, pencils, note pads, calendars, and similar items;
5. acceptance of gifts of modest value that are related to commonly recognized events or occasions, such as a promotion, new job, wedding, retirement, Christmas, new baby; and;
6. acceptance of civic, charitable, educational, or religious organization awards for recognition of service and accomplishments.

This policy specifically prohibits those individuals ordering for PTM from accepting gifts in connection with the ordering of supplies, except as indicated above. Any gifts, premiums, etc., received as a result of such an order must be made available for the use of all PTM contractors.

DISCIPLINARY POLICIES

We expect our contractors to behave in a courteous and professional manner at all times, toward our customers, coworkers and all others with whom they come into contact while at work. Some types of misconduct will normally result in immediate termination. These include:

1. Theft -- the unauthorized taking of PTM', another contractor's, or a customer's property.
2. Fighting -- striking or threatening another contractor, customer or guest, except in self-defense against unprovoked attack.
3. Falsifying records -- including time sheet records, work reports, official documents, employment applications, etc.
4. Insubordination -- willful refusal to comply with orders or instructions from supervisors or other designated authority during work hours; this also includes threatening or assaulting a supervisor or coworker.
5. Destruction of property -- willful or deliberate damage or destruction of PTM', a client's, visitor's or coworker's personal property.
6. Intoxication -- reporting to work or working under the influence of intoxicating beverages or unlawful drugs or the inappropriate use of over the counter or prescription drugs. Possession of drugs or alcohol on PTM' premises shall also be considered the same offense. If you are taking a prescription drug prescribed by your physician, please let your supervisor know in case you suffer any adverse side effects from the drug while on the job. PTM may, if it has reason to believe a contractor is under the influence of alcohol or drugs, require the employee to submit to a physical examination that would include providing blood and urine samples to be tested for the presence of illegal drugs. If a contractor fails or refuses to submit to a drug or alcohol test, or if a test shows a scientifically measurable amount of an illegal drug in a contractor's body or a blood alcohol level above .10 percent, the contractor will be immediately discharged.
7. Weapons -- possession of weapons or explosives on PTM' premises. This does not include personal protection sprays, pocketknives or similar items.
8. Unauthorized disclosure of information -- discussion or distribution of confidential PTM information to anyone outside PTM or inappropriately within the company.
9. Willful and purposeful violation of PTM' Confidentiality Policy.
10. Serious violation of PTM' Policy against Harassment or Policy against Sexual Harassment.
11. Violation of PTM' policies on Electronic Communications, IT Security and HIPAA Compliance.
12. Unsatisfactory job performance.

Some types of offenses are considered less severe, though still serious. These offenses will result in discipline and may result in termination depending on the circumstances. These types of offenses include:

1. Work slowdown -- a willful slowdown or stoppage of work or interfering with or restricting the work performance of another.
2. Sleeping on the job.
3. Solicitation or distribution of literature during working time in working areas.
4. Safety violations -- maintaining or failing to report a hazardous condition to an employee's supervisor; failing to follow safety guidelines; or creating a situation that may result in injury to yourself or a coworker.

5. Conflict of interest – engaging in personal work or work for any other employer during your working time.
6. Horseplay -- loud and boisterous conduct or horseplay which may be discourteous or harmful.
7. Unsatisfactory work performance.

These are not intended to list all offenses for which discipline may be appropriate, but, rather, they are guidelines of the types of conduct that is prohibited. Service and professionalism are an important part of our business, and we expect all of our contractors to behave in a courteous and professional manner toward our customers and toward their coworkers. Safety is also a key to our success, and it is vital that all of our contractors work safely and follow our safety guidelines at all times.

Policy against Sexual Harassment, Offensive and Inappropriate Conduct

PTM is committed to maintaining a high standard of conduct in the workplace and to providing a work environment free from sexually harassing, offensive or inappropriate activity. Such activities are averse to the overall accomplishment of our mission. Accordingly, all PTM contractors are responsible for maintaining a high standard of conduct in the workplace and must refrain from engaging in harassing, offensive or inappropriate activities.

Sexual harassment is a form of sex discrimination prohibited by Title VII of the Civil Rights Act of 1964, as amended. It involves **unwanted** and **unwelcome** sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- explicitly or implicitly a condition of an individual's contractor agreement; or
- workplace decisions (promotions, work assignments, etc.) are based on whether the victim submits to or rejects these sexual advances; or
- unreasonably interfere with an individual's work performance or create an intimidating, hostile, or offensive work environment.

Moreover, PTM has a **zero tolerance** for any conduct of a sexual nature that could reasonably be interpreted as harassing, offensive or inappropriate in the workplace. Thus, in addition to the Title VII standard cited above, any physical contact, comments, jokes, gestures, written documents, pictorials, images or other items or behavior of a sexual nature in a work or work-related environment constitutes harassing, offensive and inappropriate conduct and will not be tolerated.

Each PTM contractor bears the legal and ethical responsibility to refrain from such unacceptable conduct in the workplace. **Managers** and **supervisors** bear the additional responsibility for taking **immediate** and **appropriate corrective** action to enforce this policy when they become aware of or should have been aware of the sexually harassing, offensive or inappropriate activities.

Depending on the severity of the circumstances, effective action may entail removing the harasser/offender from the work environment and imposing some form of discipline ranging from a written reprimand to termination. Managers and supervisors who tolerate such harassing, offensive or inappropriate behavior or fail to take prompt and corrective action upon becoming aware of such activities may receive a reduced rating on their EEO performance element and also may be subject to disciplinary action, up to and including termination of employment.

Any contractor who believes he or she has been subjected to sexual harassment, offensive or inappropriate conduct of a sexual nature should immediately report this to a supervisor or manager for corrective action. If the contractor's supervisor is the source of the harassing, offensive or inappropriate action, the contractor should speak to the Director of Human Resources, the Chief Operating Officer or Chief Executive Officer. Contractors are free to report any incidents involving sexual harassment, offensive or inappropriate conduct without

fear of reprisal. If the supervisor/manager does not take immediate action to stop the harassing, offending or inappropriate activity, the contractor should bring the matter to the attention of Human Resources, Chief Operating Officer, or Chief Executive Officer within 45 calendar days of the particular incident.

Any comments or questions related to this policy should be addressed to the Director of Human Resources.

Policy against Harassment

We prohibit harassment of all types against our contractors. Harassment based on sex, race, religion, disability, ethnic origin, age, and color is also grounds for discharge. All of our contractors are entitled to be treated courteously and with dignity. If you feel you have been the victim of any form of harassment, please follow the procedure set forth above in the Policy against Sexual Harassment, Offensive, and Inappropriate Conduct.

Violence or other Inappropriate Behavior

Threatening contractors, customers, visitors, or vendors, or engaging in threatening or violent behavior in our workplace, at customer sites, or using Electronic Communications is a serious matter. Such conduct places the safety and health of our contractors and customers in jeopardy and will not be tolerated. Contractors engaging in such activities will be subject to appropriate corrective action up to and including termination, and perhaps legal action from the victim(s) of their conduct.

Violent or inappropriate behavior includes, but is not limited to:

- Threats of any kind;
- Threatening, physically aggressive or violent behavior such as intimidation or attempts to instill fear in others;
- Other behavior including belligerent speech, excessive arguing, or sabotage of PTM property;
- Defacing PTM property or causing physical damage to PTM facilities or equipment;
- Breaking any laws or regulations regarding firearms;
- Unless specifically allowed by law, bringing weapons or firearms (including hunting rifles) of any kind on PTM premises, in PTM parking lots in personal vehicles while being used for PTM business or in PTM vehicles and/or;
- Using any object in a threatening or weapon-like manner.

If you are threatened, or the victim of a violent act in the workplace, or if you observe behavior that is violent, or potentially violent (as described above), immediately report it to your supervisor or any other member of management and to the Human Resources Department. This includes threats or violent acts by coworkers, customers, visitors, or others who have come

onto our premises.

All reports of workplace violence will be taken seriously and will be investigated promptly and thoroughly. We will maintain confidentiality when possible (*i.e.*, release information only to those with a business need-to-know). We will not tolerate retaliation against anyone who reports workplace violence.

Unfortunately, sometimes nonemployees may try to bring their personal disputes into our workplace. To protect your safety and the safety of your coworkers, please immediately report to your supervisor and the Human Resources Department personal situations which may bring violence to our workplace. By being forewarned we can take appropriate measures to try and protect you and/or your co-workers. Anyone who reports potential workplace violence from a domestic or personal dispute do not need to fear corrective action or retaliation.

Violations and Consequences

No contractor is ever authorized to commit, or direct another contractor to commit, an unethical or illegal act. Unethical or illegal acts cannot be justified by saying they were for the good of the organization or were directed by a higher authority in the organization. In addition, contractors cannot use another contractor, agent, consultant, broker, distributor, or other third party to perform any act not allowed by law, the *Corporate Compliance Policy*, any organization policy, or any applicable contractual obligation.

All violations of the law, *Corporate Compliance Policy*, organization policies and contractual obligations will be taken seriously and may result in discipline, up to and including dismissal. Not cooperating with, obstructing or undermining investigations, withholding or destroying information, or providing incomplete or misleading information are violations of the *Corporate Compliance Policy*. Contractors who are not diligent and fail to report, and in some cases detect violations may also be disciplined.

In addition, contractors who commit criminal or illegal acts may face immediate dismissal and, for acts against PTM, possible court action.

Background Investigations

- Prospective Contractors - PTM requires a reasonable and prudent background investigation to determine whether prospective contractors were ever criminally convicted, suspended, debarred or excluded from participation in a federal program.
- Current Contractors - PTM may conduct periodic reviews of current contractors and/or subcontractors and agents to determine whether any have been suspended or debarred or are under criminal investigation or indictment.
- Removal of Ineligible Contractors - If a contractor is found to be ineligible, PTM will remove the contractor from direct responsibility for, or involvement with, the Medicare program, as appropriate.

Compliance Training

PTM compliance training is mandatory. Compliance training is an integral part of PTM' new contractor orientation programs.

PTM routinely reviews and modifies the training programs as needed and enhances the training

to incorporate additional areas of training necessitated by the changing business environment.

Customer Relationships

Communications with Customers

One of PTM' goals is to satisfy its customers (e.g., Centers for Medicare & Medicaid Services, Medicare consumers, hospitals, clinics, physicians, or health plans) with high-quality products and services. We must treat customers with honesty, integrity, fairness, and respect at all times; and we must make promises only when we are reasonably sure we can keep them. It is always best to show your professionalism and represent PTM in the best possible manner.

Competitive Information

PTM believes in honoring copyrights and respecting the trade secrets of others. You must not make unapproved copies or reveal or use any trade secrets of a competitor, including a former employer, in connection with your duties at PTM. This includes customer lists, technical developments, or operational data. We also must not create misleading impressions, omit important facts, or make false claims about our competitors' offerings.

Confidentiality of Information

All persons performing services for PTM, including employees, temporary workers, committee members, consultants, and contractors, must be aware of the confidentiality of the information handled in the course of a day.

A strict standard of confidentiality is necessary to ensure compliance with state and federal laws. Disclosure of confidential or proprietary data, information, or records is forbidden except in situations where disclosure is necessary to carry out job-related responsibilities.

Confidentiality and Disclosure of Patient Information

At PTM, we collect or have access to information about the medical conditions and treatment of patients. We know this is sensitive information and are determined to keep it confidential. We do not give out or talk about patient-specific information with others unless we have the patient's consent, it is necessary to serve the patient, it is allowed or required by law, or it is determined appropriate to protect the patient or others.

PTM contractors must never disclose confidential information or Personal Health Information (PHI) that violates the privacy rights of the patient. Contractors must not view any patient information other than what they need to do their job.

Note: For additional information, refer to applicable PTM policies.

Confidentiality and Disclosure of Provider Information

PTM and its contractors are often in possession of information pertaining to health facilities. Many times, this type of information may be classified as confidential data. Contractors must follow PTM policies, which are based on law and federal regulations, when determining whether health care facility information can be released outside of PTM.

Note: For additional information, refer to applicable PTM policies.

Health Insurance Portability and Accountability Act (HIPAA)/Regulations on Data Exchange between PTM and Health Care Organizations

PTM is often subject to HIPAA regulations and the terms of Business Associate Agreements with our clients. Under those circumstances, all PTM staff and contractors must adhere to those regulations and agreements.

Use of Information

Generally, PTM has acquired information for limited purposes. In some cases, PTM is allowed to use the information for other purposes, such as research and analysis. PTM will use information only for the reasons it was received or as the law allows.

Your duty to guard PTM' confidential and proprietary information and trade secrets continues after you leave the organization.

Note: For additional information regarding Confidentiality of Information, refer to the PTM Contractor Handbook Section "Contractor and Reviewer Policies for Protection of Confidentiality", and Section "Contractor Records and Disclosure".

Conflict of Interest

Business decisions and actions must be based on the best interests of PTM and not personal interests or relationships. Relationships with prospective or existing suppliers, providers, contractors, customers, competitors or regulators must not affect your independent and sound judgment on behalf of PTM. Avoid any situation that causes or appears to cause a conflict of interest with PTM' interests.

Disclosure

The best way to avoid a conflict of interest is to disclose any relationships others might misinterpret. This includes any relationships with other employees, contractors, customers, suppliers, and competitors. You should raise questions about possible conflicts of interest and disclose these kinds of situations to your supervisor as they arise.

PTM Business Relationships

PTM has business contracts and relationships with a number of entities that could lead to potential conflicts of interest. To address these situations, PTM adopts policies and mitigation plans that are specifically designed to eliminate such conflicts.

Record Keeping

Contractor Records

It is very important, for tax and benefit purposes, and in the event of a personal emergency, that contractor records be accurate at all times. All contractor files are kept according to the

guidelines of the Data Privacy Act.

All financial books, records, and accounts must correctly reflect transactions and events, and conform both to generally accepted accounting principles and to PTM' system of internal controls.

Time Sheets/Expense Reports

PTM contractors are personally responsible for ensuring the accuracy of their labor/expense charges in a timely fashion. Supervisors/project managers are responsible for providing contractors with the proper project codes for the work they perform.

Regulatory Compliance

PTM will answer government requests for information as required by law. It is important, however, that PTM is able to protect the legal rights of the organization and its contractors and board members when responding to such requests. As a result, contractors and board members must refer all government requests for information to the staff that have been assigned responsibility for regulatory compliance.