



Aetna Medicaid Administrators LLC Policy

Policy Name: Physical Safety for Field Based Colleagues	Page	1 of 11
Department: Medical Management	Policy Number:	7000.87A
Subsection:	Effective Date:	02/12/2019
Applies to:	■ Medicaid Health Plans ■ Medicare/Medicaid Health Plan ■ LTSS Health Plan	

PURPOSE:

The purpose of this policy is to promote safe work practices and a safe work environment for CVS Health® field-based colleagues and other business partners when they go into the community to visit with members to complete any type of care management, utilization management, service coordination activity, or direct care services*. This includes community visits conducted with members or their families in the following community settings:

- **Hospital,**
- **Residential Treatment,**
- **Community Care and**
- **Field Work (including home visit).**

Studies demonstrate that health care workers face an increased risk of work-related assaults from individuals that are in inpatient and acute psychiatric services, geriatric long term care settings, urban Emergency Departments, and residential and day service settings. Pain, devastating prognoses, unfamiliar surroundings, mind, and mood altering medications, and disease progression contribute to agitation and violent behavior.

Overall workplace safety is covered by the CVS Workplace Violence Prevention Policy (CHR-0003)¹, which prohibits threats or overt acts of violence committed on Company owned or leased property, at work sponsored events, or in the course of conducting CVS Health® business.

SCOPE:

This policy applies to all CVS Health® field based colleagues.

STATEMENT OF OBJECTIVE:

Specific to community visit physical safety, the objectives of this policy are to:

- **Define the standard safety program elements for physical safety**
- **Define training expectations for new-hire, annual, and post-incident training**
- **Define roles and responsibilities of colleagues and management in adhering to risk management protocols**



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- **Define post-incident procedures, including expectations for reporting and incident review the goal of avoiding future incidents**

NOTE: Direct Care Services are only conducted by CVS Coram Specialty colleagues and may include patient education, medication administration, and venous access device maintenance.

DEFINITIONS:

<u>CVS Health ®</u>	<u>CVS Health Corporation and each of its subsidiaries and affiliates.</u>
<u>Health Care Benefit Colleagues</u>	<u>HCB = Legacy Aetna Colleagues</u>
<u>Member</u>	<u>A person insured or otherwise provided coverage by a health insurance organization.</u>
<u>Patient</u>	<u>A person receiving or registered to receive medical treatment</u>
<u>Community Visit Settings</u>	<u>CVS Health field based colleagues going into any of the following settings to visit with a member or members family:</u> <ul style="list-style-type: none"> • <u>Hospital (large institutional medical facilities</u> • <u>Residential Treatment (institutional facilities such as nursing homes, and other long-term care facilities),</u> • <u>Non-residential Treatment (small neighborhood clinics and mental health centers),</u> • <u>Community Care (community-based residential facilities and group homes).</u> • <u>Field Work (home visits, homeless shelters, jails).</u>
<u>Care Management</u>	<u>Care Management colleagues include the following:</u> <ul style="list-style-type: none"> • <u>CCM- clinical case manager</u> • <u>CMC- case management coordinator</u> • <u>CMA – case management associate</u> • <u>CHW – community health worker</u> • <u>Community resource educator</u> • <u>PEER colleagues</u> • <u>Other job titles designated by specific business needs</u>



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	<u>The above will be referred to as <i>colleagues</i> throughout the remainder of the document.</u>
<u>Incident</u>	<u>Incidents include verbal or physical threats, violent acts (including physical assaults and threats of assaults) directed toward persons at work or on duty, and any incident that results in death, injury, or illness.</u>
<u>Near-Miss</u>	<u>Near misses are incidents that could have potentially resulted in a death, injury, or illness. These are caused by the same conditions that produce more serious outcomes and signal that a hazard exists.</u>

LEGAL/CONTRACT REFERENCE:

- **Guidelines for Preventing Workplace Violence for Healthcare and Social Services Workers, OSHA 2016**

The OSHA’s Office of State Programs (OSP) oversees OSHA-approved State Plans, which may require more than the OSH Act of 1970. To see additional details please refer to the OSHA site (Link). There are currently twenty-two (22) states or territories that have OSHA-approved State Plans that cover both private and state and local government workers. Moreover, there are five (5) additional states and one (1) territory that has OSHA-approved State Plans that only cover state and local government workers.

FOCUS/DISPOSITION:

Physical Safety

The goal of the Physical Safety program is to prevent workplace violence, including physical assaults and threats of assaults, against CVS Health’s field based colleagues. CVS Health’s Physical Safety program includes training, roles and responsibilities of colleagues conducting community visits, roles, and responsibilities of the management of these departments, postincident actions such as reporting, debrief and colleagues support activities, and annual program reevaluation.



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Training

The goal of training as a risk management tool is to reduce the likelihood of colleagues being assaulted and having their health compromised. Training will:

- (1) Raise physical safety knowledge across the Health Care Benefits (HCB – Legacy Aetna) Care Management**
- (2) Provide tools for colleagues to increase awareness and identification of potential safety and security hazards,**
- (3) Address potential problems before they arise, and**
- (4) Teach colleagues how to protect themselves through established procedure.**

CVS Health conducts Physical Safety training for colleagues that conduct community visits.

- **Training is required as part of new hire training for all HCB Care Management colleagues and, as needed for Utilization Management (UM) colleagues that will be going into the community for UM activities**
- **Training is required to be completed before colleagues conduct their first unaccompanied community visit**
- **Training is required annually to reinforce safety policy and protocols**
- **Post-incident training/ procedure review is required to increase colleague awareness and reinforce safety policy and protocols**

Roles and Responsibilities

Management and colleagues commitment and participation are essential for an effective physical and health safety program

Colleagues will:

- **Participate in training and retraining with regard to Physical Safety**
- **Follow process and techniques identified to reduce the risk of injury or assault. This includes adhering to the standard process established with regard to cell phone use, safety apps or safety devices, and use of security escorts.**
- **Report all actual, near-misses, or threats of violence in the workplace or when conducting a community visit**
- **Follow protocol for reporting all such incidents internally to one's department management and to Corporate Security & Resiliency, through Aetna's Corporate**



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Security Operations Center (CSOC) for HCB colleagues or CVS Health Operations Center (CHOC) for all other colleagues

Management will promote and be committed to the physical and health safety program by:

- Participating in training and retaining with regard to Physical Safety
- Promoting a safety, healthful, and violence-free workplace for colleagues and members
- Understanding management's obligation to deal effectively with violence and health protocols and reduce the risk for colleagues
- Maintaining a system of accountability for managers, supervisors, and colleagues
- Supporting and implementing the program and program changes
- Enforcing reporting, documenting, and monitoring of incidents, near-misses, and threats.
- Ensuring no reprisals are made against anyone who reports in good faith

Reporting

Regardless of the type of threat (such as phone, email, physical mail, social media or in person, near-miss or an actual violent incident), CVS Health® follows a standard process to respond to potential or actual threats to safety and security. With colleague life, health, and safety being the number one priority, this process includes steps to assess the situation, identify actions, develop responses, and communicate. This reporting process is not intended to be exhaustive nor is it intended to be prescriptive or to replace prudent judgment. Colleagues should follow this procedure when facing a threat of violence while conducting community visits.

The colleague immediately should contact their direct manager or supervisor via face to face, phone call, and/or email. The colleague may notify their direct manager or supervisor of the sent email via instant messaging. If colleague's direct manager or supervisor is not immediately available, the colleague will notify any available manager or supervisor. The colleague will provide the following information:

- Facility Name (if applicable)
- Persons involved (including member name, colleague involved, supervisor/manager notified, and any others)



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- **Member identification (ID) number (for situations involving HCB members)**
- **Member telephone number**
- **Member address**
- **Situation specifics**

If an incident results in injury or illness, the colleague should report it to Workers' Compensation. For HCB Colleagues, follow the Instructions for Reporting a Work-Related Injury Policy found on My HR Source .

The manager or supervisor will notify security. For HCB call CSOC at 1-800-682-3213. As soon as a threat or incident is reported to the CSOC, they will obtain information, initiate communications, and coordinate appropriate resources until the risk is mitigated.

Managers and Supervisors

Managers and supervisors who receive reports of near-misses, violent incidents, or actual or suspected threats of violence in the workplace are responsible for notifying CSOC and building management as soon as possible. If a manager or supervisor is unable to determine if a violent incident or actual or suspected threat of violence in the workplace has occurred, , the manager must still report the incident.

If a colleague is injured on the job, the manager will remind or arrange for the colleague to seek immediate medical attention if needed and to file a worker's compensation claim. To ensure that all investigative leads are pursued and coordinated through CSOC, colleagues should never conduct independent investigations outside the scope of their job.

Managers, supervisors, and colleagues are responsible for knowing, understanding, and complying with CVS Health's non-retaliation policy and maintaining confidentiality per the [Code of Conduct](#).

For incidents of violence, such as confirmed dangerous situations that involve injury or threat of harm, the manager or supervisor will make the following contacts in this order:

- 1. 911 or Local area police department if there is an imminent threat**
- 2. For HCB Staff: Contact CSOC via Microsoft Teams Instant Messenger: "Emergency Corporate Security" or by phone (1-800-682-3213)**
- 3. Vice president or director of the functional area**



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4. Any Executive Leadership Team (ELT) member, including chief executive officer, chief operations officer, chief medical officer and chief financial officer

The Management Team will review the situation and determine any follow-up actions that should be taken with the CVS Health® colleague directly or indirectly affected by the incident to ensure their health and well-being. The Management Team, in coordination with Human Resources (HR) and Legal, will develop a post-incident communication.

Non-Retaliation

CVS Health® will not tolerate, or engage in, retaliation against any colleague who reports in good faith or cooperates in the investigation of an actual, suspected, or near-miss fatality, injury, incident, or illness. Any reports by colleagues and other business partners will remain private and confidential to the extent practical and allowable under the law. Reports made to Aetna’s CSOC / CHOC are taken seriously and will be investigated for proper follow-up and resolution in accordance with CVS Health® policies. Bad faith reports are not tolerated and will be referred to Aetna Human Resources, Compliance, or other appropriate office. A “bad faith” report is one where the colleague does not have a good faith basis for such report or makes such report in a manner that is intended to, or would reasonably lead to, harass, or intimidate another colleague. An accusation or report made in bad faith may result in disciplinary measures up to and including termination.

OPERATING PROTOCOL:

Systems

All potential threats and incidents reported to the CSOC will be documented in the respective reporting system. An incident report type will be created to capture community visit incidents and document the following details:

- **Persons involved, including witnesses**
- **Location of the incident**
- **Specific details of the incident**
- **Notifications conducted**
- **Actions Taken**

Measurement



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- **New Hire colleagues- Verification of completion of all required Safety Training prior to the first field visit.**
- **Existing colleagues- Annual retaining completed**

Reporting

- **Quarterly New Hire Safety Program Attestation report**
- **Quarterly Manager Safety Team Talking Points Attestation Report**

INTER-/INTRA-DEPENDENCIES:

Internal

- **HCB and Kidney Care Management**
- **Corporate Communications**
- **Enterprise Crisis Response Team (ECRT)**
- **Corporate Security Operations Center (CSOC)**
- **CVS Health Operations Center (CHOC)**
- **Human Resources**
- **Learning and Performance**
- **Legal**
- **Utilization Management**

External

- **Not Applicable**



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Lisa M. VanSteelant, Vice President
Market Operations & Governance
Aetna Medicaid

Chris L. Jagmin, M.D.
Vice President, Chief Medical Officer
State Programs & Medical Policy
Aetna Medicaid



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PURPOSE:

Aetna Better Health has adopted CVS Health’s AMA 7000.87 Physical Safety for Field Based Colleagues policy. This policy amendment documents Aetna Better Health’s acceptance of the policy and defines those practices used to comply with Aetna Medicaid Administrators LLC and Aetna Better Health business standards.

This amendment will be used in conjunction with the 7000.87 Corporate policy to comply with Aetna Better Health’s Medicaid regulatory and legislative requirements.

There are no requirements for Aetna Better Health that deviate from those detailed in the AMA Corporate Policy.

DEFINITIONS:

<u>Aetna Medicaid Administrators LLC (AMA)</u>	<u>A subsidiary of CVS Health Corporation, AMA is the company's national Medicaid subsidiary that provides plan management and other administrative services for the Medicaid programs nationally.</u>
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LEGAL/CONTRACT REFERENCE:

- **2023 Louisiana Medicaid Managed Care Organization Statement of Work**

POLICY LANGUAGE AMENDMENT:

Aetna Better Health Medical Management department is responsible for documenting Aetna Medical Management policies that are applicable to the health plan by implementing and maintaining policy amendments. These amendments are formatted and managed in compliance with AMA business standards as defined in AMA policies 1501.02 Aetna Medicaid Administrators Policy Committee and 1501.03 Policy Development, Revision, Execution and Maintenance. Business processes that vary from the standards denoted in the Aetna Medical Management policy, if any, are detailed in the Aetna Better Health amendment.



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Aetna Better Health

Jess Hall
Chief Executive Officer

Antoinette Logarbo, MD
Chief Medical Officer