



Aetna Medicaid Administrators LLC Policy

Policy Name:	Biological Safety for Field Based Colleagues	Page:	1 of 14
Department:	Medical Management	Policy Number:	7000.86A
Subsection:	Integrated Care Management	Effective Date:	02/12/2019
Applies to:	■ Medicaid Health Plans ■ Medicare/Medicaid Health Plan ■ LTSS Health Plan ■ Medicare ■ Commercial ■ DSNP ■ Joint Venture ■ CVS Kidney Care ■ Coram CVS Specialty Infusion Services		

PURPOSE:

CVS Health® colleagues who meet face-to-face with members or handle materials that can spread infection, are at risk for exposure to serious and sometimes deadly diseases. Following standard precautions, avoidance, appropriate vaccines and testing can help to reduce the chance that CVS Health® colleagues will get or spread preventable diseases, protecting not only themselves and their families, but also our members, and other CVS Health® colleagues.

The purpose of this policy is to promote safe work practices and a safe work environment for CVS Health® Field Based Care Management when they go into the community to visit with members to provide any type of care management, utilization management, or service coordination activity. This includes community visits conducted with members or their families in the following community settings: hospital, residential treatment, non-residential treatment/ service, community care, and field work.

Overall workplace safety is covered by the CVS Workplace Violence Prevention Policy (CHR-0003) and Physical Safety for Field Based Colleagues Enterprise DOC-061617 policy.

Scope:

This policy applies to all CVS Health ® Field Based Colleagues.

STATEMENT OF OBJECTIVE:

The objective of this policy is to create awareness and accountability for biologic safety for field based colleagues by defining:

- **Standard program elements for biological safety**
- **Expectations for new-hire, annual, and post-incident training**
- **Roles and responsibilities of colleagues and management in adhering to risk Management strategies such as Standard Precautions, Avoidance, Vaccination and testing recommendations**
- **Post-incident procedures, including expectations for reporting and incident review with the goal of avoiding future incidents**



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DEFINITIONS:

<u>CVS Health®</u>	<u>CVS Health Corporation and each of its subsidiaries and affiliates.</u>
<u>Member</u>	<u>A person insured or otherwise provided coverage by a health insurance or managed care organization.</u>
<u>Community Visit Settings (OSHA)</u>	<u>CVS Health® field-based colleagues visiting a member or member’s family in any of the following settings:</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, etc.).</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> <u>The above will be referred to as Colleagues throughout the remainder of the document.</u>
<u>CVS Kidney Care</u>	<ul style="list-style-type: none"> • <u>Face to Face nurse educators</u> • <u>Nurse supervisors/managers</u>
<u>Coram CVS Specialty Infusion Services</u>	<ul style="list-style-type: none"> • <u>Corum Nurses</u> • <u>Corum Dietitians</u>



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LEGAL/CONTRACT REFERENCE:

- **Not Applicable**

AUTHORITATIVE REFERENCES:

- **CDC Recommend Vaccines for Health Care Workers, CDC 2016.**
<https://www.cdc.gov/vaccines/adults/rec-vac/hcw.html>
- **Guidelines for Preventing Workplace Violence for Healthcare and Social Services Workers, OSHA 2016.** <https://www.osha.gov/Publications/osh3148.pdf>
- **Infection Control – Standard Precautions for all Patient Care**
<https://www.cdc.gov/infectioncontrol/basics/standards-precautions.html>
- **Tuberculosis (TB) Testing Health Care Workers, CDC 2016. Updated March 8, 2021** <https://www.cdc.gov/tb/topic/testing/healthcareworkers.html>

FOCUS/DISPOSITION:

Biological Safety

Biological Safety includes taking precautions against biological threats such as disease, infections or pathogens. CVS Health® Biological Safety program includes:

- **Training program for all colleagues that conduct face-to-face visits with members in the community to understand biological risks.**
- **Education on standard precautions and avoidance, including restrictions on colleagues providing direct care or transporting members as risk management strategies.**
- **Education and recommendations for immunizations as a risk management strategy.**
- **Education and recommendations for TB testing.**
- **Roles and responsibilities of colleagues conducting community visits, roles and responsibilities of the management of these departments, post-incident actions such as reporting, debrief and colleague support activities, and annual program reevaluation.**



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Training

The goal of training as a risk management strategy is to reduce the likelihood of colleagues being infected or spreading infection and compromising the health of the colleague, their families, their co-workers, and the members we serve. Training will:

- **Raise biological safety knowledge across the Aetna field-based Care Management, CVS Kidney Care and Coram CVS Specialty Infusion departments,**
- **Provide tools for colleagues to increase awareness and identification of potential biological safety and security hazards,**
- **Address potential problems before they arise, and**
- **Teach colleagues how to protect themselves through established procedure.**

CVS Health® completes Biological Safety training for colleagues who conduct community visits.

- **Training includes: Standard Precautions and Avoidance, Immunization Recommendations and Testing Recommendations as risk management strategies.**
- **Training is required as part of new hire training for all colleagues who will be going into the community for Care Management, CVS Kidney Care, Utilization Management, or Service Coordination activities, Specialty Infusion Services.**
- **Training is required to be completed before colleagues conduct their first community visit.**
- **Training is required annually to reinforce biological safety policy and protocols.**
- **Post-incident training / procedure review should be conducted to increase colleague awareness and reinforce safety policy and protocols.**

Standard Precautions and Avoidance

CVS Health's Biological Safety training begins with standard precautions which include hand hygiene, respiratory etiquette, and includes avoidance. Standard precautions follow the CDC recommendations for infection control.2, 3 Following standard precautions is the first line of defense to prevent contracting or spreading an infectious disease.

The standard precautions applicable for this program are appropriate for the Aetna field based Care Management and CVS Kidney Care programs that do not provide direct or hands-on care, assistance with activities of daily living (ADLs) or instrumental activities of daily living (IADLs), home healthcare or transportation to any member, regardless of the



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colleague's degree or clinical background as this is outside of their roles and responsibilities.

Hands-on Care

CVS Health® programs that include colleagues providing hands-on care / direct care are outside the scope of this document.

Hands-on care requires additional levels of Standard Precaution protocols. Colleagues involved in Aetna programs providing hands-on care of members should follow Aetna Policy 416-01 Face-to-Face Engagement Policy.

CVS Health® colleagues should not visit (i.e., avoid) members who are reporting to be actively ill or with fever, especially if reported to have active tuberculosis (TB) or one of the other airborne diseases identified by the CDC:

- **Measles,**
- **Mumps,**
- **Chickenpox,**
- **Smallpox,**
- **Whooping Cough,**
- **Flu,**
- **Shingles or**
- **COVID-19**

Aetna colleagues who are symptomatic of infectious illness or have a fever should not visit members or come to the office.

Immunization Recommendations

CVS Health® recommends that Field-Based colleagues review their immunization history and obtain vaccines as necessary to in accordance with the CDC list of Immunizations for Health Care Workers, including the annual Influenza Vaccine.4 It is also recommended that colleagues be educated about diseases that are easily spread and can be vaccinated against. The goal of the recommendations is to increase awareness and encourage Field-Based colleagues to ensure they are current on all immunizations. These actions reduce the chance that a CVS Health® colleague will be infected with or spread preventable diseases; protecting not only themselves and their families, but also members, and other CVS



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Health® colleagues.5 Colleagues may request these immunizations through human resources (HR).

Tuberculosis (TB) Prevention Recommendations

CVS Health’s first line of defense for colleagues is for colleagues to adhere to standard precautions, especially avoidance, of members with active TB. This includes confirming the member does not have TB disease (active TB) prior to a visit and not meeting with members that are in a TB Unit or being treated for TB disease regardless of the setting. Colleagues potentially exposed must follow the reporting process below and comply with TB testing and quarantine protocols. In addition to testing when potential exposure is suspected.

CVS Health® colleagues are at higher risk if their workplace is located in facilities in regions or facilities with high prevalence of TB, active TB units/floors in facilities, jails, and homeless shelters. The risk is increased due to their potential exposure to TB through prolonged shared air space with TB infected or potentially infected members. CVS Health® recommends colleagues located in these facilities with prolonged potential exposure participate in the TB testing program at the level recommended by the facilities TB risk-assessment. Colleagues may also receive TB screening tests, paid for by the Company, upon movement into a field-based care manager role Infusion Specialty Services role, and annually thereafter.

Roles and Responsibilities

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

Colleagues must:

- **Participate in new-hire and annual training for Biological Safety**
- **Follow biological safety recommendations of standard precautions and avoidance**
- **Follow avoidance protocol when a member or the colleague is ill**
- **Follow active TB avoidance protocol, even when not stationed in high-risk setting**
- **Report any suspected or known biological exposure or diagnosis of an infectious disease following the reporting protocol.**



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Colleagues should consider:

- Obtaining CDC recommended vaccinations for health care workers
- Obtaining TB testing when stationed in high-risk settings

CVS Health® recommends field-based colleagues be immunized to protect themselves. In some circumstances, colleagues may be required to obtain immunizations. Some states have implemented vaccination laws that include vaccination requirements (vs recommendations) for colleagues of Health Care Facilities including Hospitals, Long Term Care Facilities and Ambulatory Care Facilities. While CVS Health® colleagues are not employees of such facilities, some states or facilities may interpret and extend the law to individuals who routinely enter the facility or are stationed in the facility. CVS Health® colleagues will be required to comply with vaccination requirements when required by law or by facilities they routinely enter. Colleagues who are unable to comply with these requirements for medical or religious reasons should call the HR Contact Center to request an accommodation.

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

- Participating in training and retraining activities
- Promoting a biologically safe workplace for colleagues and members
- Understanding management's obligation to deal effectively with biological & health protocols and reduce the risk for colleagues and members
- Supporting and implementing the program and program changes
- Enforcing reporting and documenting of all actual or potential biological exposure and preventing any retaliatory action toward colleagues who report in good faith.

Reporting Biological Exposure

After taking the appropriate sanitation actions/precautions, colleagues will notify their direct manager or supervisor if exposed to

- A member with active TB,
- A confirmed active infectious disease identified in the Centers for Disease Control and Prevention (CDC) list at CDC Quick Disease Reference Guide (CVS FORM-065218)
- Biological fluids while in the course of their work.



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If a direct manager or supervisor is not immediately available, the colleague will notify any available manager or supervisor. The manager or supervisor will ensure the colleagues also reports the incident into Worker's Compensation if the colleagues is exposed while at work and becomes ill. For instructions on how to report work-related exposure, refer to Instructions for Reporting a Work-Related Injury at My HR Source.

The report should include the following information:

- **Facility Name (if applicable)**
- **Member name**
- **Member Aetna identification (ID) number (for situations involving Aetna members)**
- **Member telephone number**
- **Member address**
- **Situation Specifics**

Managers and supervisors

Managers and supervisors who receive reports of potential exposure to infectious disease are responsible for notifying HR, and Risk Management (RM), if applicable, as soon as possible. If the colleague becomes ill as a result of the exposure, the manager, supervisor, or colleague must report the incident. See Instructions for Reporting a Work-Related Injury at My HR Source. If a manager or supervisor is unsure whether an exposure to infectious disease had or has occurred, the manager or supervisor must still report the incident. Managers and supervisors are responsible for knowing, understanding, and complying with CVS Health's non-retaliation policy and maintaining confidentiality.

The manager or supervisor will report to the following contacts:

- **Workers Compensation if the colleague was exposed to the disease while working and becomes ill**
- **Human Resources (HR)**
- **The Department manager and director**

Individually identifiable information, such as the name of the member or colleague should only be shared according to a "minimum necessary" standard and should not generally be included in email communications except as required for risk management or workers' compensation reporting.



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Human Resources will coordinate with the Infectious Disease Response Team (IDRT) and RM to develop guidance for the colleague's management team. Guidance will be provided based on review of the situation specifics provided. Guidance will include actions that should be taken for the safety of the colleague, the members, and other colleagues he/she may have interacted with. Guidance will also include recommendations for communication that may be needed to address the situation such as notices to other colleagues or to the member, depending on the situation.

If needed, communications will generally include:

- **Description of the situation (without reference to the colleague by name)**
- **Potential risk of co-worker exposure and what the Company is doing to mitigate risk and protect co-workers**
- **Any gaps in protocol that contributed to the situation**
- **Actions taken appropriate to the situation**
- **A reminder to colleagues about the Biological Safety Policy and Procedures**
- **A reminder to colleagues about reporting all incidents and the non-retaliation commitment**

Note: CVS Health® and its colleagues are not required or responsible to report colleague or member diseases / infections to the Health Department and should not report. It is the responsibility of the diagnosing and treating physicians to report per established community protocols.

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 or potential biological safety breach incident or illness in good faith.

Any reports by CVS Health® colleagues and other business partners will remain private and confidential to the extent practical and allowable under the law. Reports made to Aetna's Corporate Security Operations Center (CSOC)/ CVS (ERR) are taken seriously and will be investigated for proper follow-up and resolution in accordance with Aetna policies.



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Bad faith reports are not tolerated and will be referred to 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

- **Workman’s Compensation systems**
- **Aetna Infectious Disease Response Team systems**
- **Human Resources systems**

Measurement

- **New Hires will receive Biological Safety training before making visit in the community**
- **After hire, colleagues will receive annual retaining on Biological Safety**
- **Colleagues will confirm understanding of requirements and recommendations via an attestation**

Reporting

- **New Hire and Annual Training transcripts from Aetna Learning Center**

INTER/INTRADEPENDENCIES:

Internal

- **Care Management**
- **Human Resources**
- **Infectious Disease Response Team**
- **Risk Management**
- **Learning and Performance**



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- **Worker's Compensation Unit**

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External

- **Not Applicable**



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Aetna Medicaid Administrators LLC

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PURPOSE:

Aetna Better Health has adopted CVS Health’s AMA 7000.86 Biological 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 7000.86 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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