

Healthcare Provider Handbook





Table of Contents

Table of Contents	2
Welcome	3
Administrative Basics	5
Code of Business Ethics	3
Standards of Conduct	g
Complaint Resolution (Staff and Customer)	15
Human Resources: Employment Application Process	16
Performance Improvement and Education Program	2
INITIAL ASSESSMENT	2
QUARTERLY ASSESSMENTS	2
PERIODIC ASSESSMENTS	2
EMPLOYEE PERFORMANCE REVIEW	22
EDUCATION	22
DISCIPLINARY ACTION	22
DO NOT SEND POLICY AND PROCESS	23
TERMINATION POLICY	23
Reporting Any Issues	24
Clinical Incidents and Sentinel Events	25



Welcome

Dear Healthcare Provider:

Welcome to the Oloop, LLC ("Oloop") team! We look forward to working with you and assisting you in achieving exciting and rewarding assignment opportunities with Oloop. This handbook will serve as your point of reference for any standards, policies and procedures that Oloop healthcare providers are expected to follow.

It is required that you review and return the acknowledgement form that accompanies this handbook. This acknowledgement form will be kept on file for our records.

AT WILL EMPLOYMENT

Your employment with Oloop is at will and this handbook is in no way, shape, or form a contract. You, the healthcare provider and Oloop have the right to terminate your employment with Oloop with or without notice or cause at any time.

MISSION STATEMENT

Our mission is to ensure stakeholder success. Each solution and service we provide is intended to nurture the success of our clients, employees, and consultants. We strive to provide the best professional healthcare professionals to healthcare systems across the US.

HARASSMENT, DISCRIMINATION, RETALIATION, AND BULLYING PREVENTION POLICY

Equal Employment Opportunity. Everyone at Oloop hails from all walks of life. These differences are what make us stronger, more innovative, and more representative of the creativity that defines our mission. So, we're committed to fostering a work environment that treats every individual with dignity and respect. We promote a professional atmosphere that embraces equal employment opportunities, while prohibiting all forms of discrimination and harassment. Relationships must be free of bias, prejudice, and harassment.

Oloop is committed to providing equal employment opportunities to all individuals without regard to race, color, religion, sex, national origin, age, disability, marital status, sexual orientation, or any other characteristic protected by law. For further information about the applicability of Federal Equal Opportunity Laws, including the Americans with Disabilities Act, the Equal Pay Act, and the Age Discrimination in Employment Act.

Oloop does not discriminate on the basis of gender in compensation or benefits for women and men who work in the same establishment and perform jobs that require equal skill, effort, and responsibility and which are performed under similar conditions.

Sexual Harassment. Sexual harassment (both overt and subtle) is a form of misconduct that demeans another person, undermines the integrity of the employment relationship, and is strictly prohibited.

Sexual harassment under the law includes unwelcome sexual advances, requests for sexual favors, offering or conditioning employment benefits in exchange for sexual favors, and other verbal and physical conduct of a sexual nature when:

- submission to such conduct is made either explicitly or implicitly as a term or a condition of any individual's employment;
- submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting the individual;
- such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.



Unlawful sexual harassment usually encompasses offensive behavior based on gender. But it also includes unwelcome visual or verbal conduct such as leering, sexual gestures, sexual jokes, flirtations, advances or propositions, inappropriate comments about an individual's body, suggestive or obscene words or jokes, and displaying suggestive articles, cartoons, pictures, or posters.

Harassment. Although sexual harassment is a more common problem in the workforce than we'd care to think, harassment in general can extend far beyond derogatory attitudes specific to gender. Unlawful harassment covers any verbal, written, or physical conduct that denigrates or demonstrates hostility toward a person because of his or her race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law. Regardless of intent, actions and words can be considered harassment when they:

- have the purpose or effect of creating an intimidating, hostile, or offensive work environment;
- have the purpose or effect of unreasonably interfering with an individual's work performance, or;
- otherwise adversely affect an individual's employment opportunities.

Harassing conduct includes epithets, slurs, or negative stereotyping; threatening, intimidating, or hostile acts; denigrating jokes; and written or graphic material that demeans, threatens, displays hostility, or shows aversion toward an individual or group. Harassing messages can be made through any media or displayed anywhere in the office using company time or equipment: walls, furnishings, letters, drawings, text messages, calls, social networking sites, email, voice messages, and other means.

Anti-Retaliation. Oloop encourages people to report all perceived incidents of discrimination or harassment. We will promptly and thoroughly investigate these reports. Oloop also prohibits retaliation against any individual who files a complaint concerning allegations of discrimination or harassment. Our policy further protects the Individuals participating in the investigation from retaliatory behavior by others.

Federal Equal Employment Laws. The right of employees to be free from discrimination in their compensation is protected under several federal laws, including the following enforced by the U.S. Equal Employment Opportunity Commission: the Equal Pay Act of 1963, Title VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act of 1967, and Title I of the Americans with Disabilities Act of 1990.

The law against compensation discrimination includes all payments made to or on behalf employees as remuneration for employment. All forms of compensation are covered, including salary, overtime pay, bonuses, stock options, profit sharing and bonus plans, life insurance, vacation and holiday pay, cleaning or gasoline allowances, hotel accommodations, reimbursement for travel expenses, and benefits.

Equal Pay/Compensation Discrimination. The Equal Pay Act requires that men and women in the same workplace be given equal pay for equal work. The jobs need not be identical, but they must be substantially equal. Job content (not job titles) determines whether jobs are substantially equal. All forms of pay are covered by this law, including salary, overtime pay, bonuses, stock options, profit sharing and bonus plans, life insurance, vacation and holiday pay, cleaning or gasoline allowances, hotel accommodations, reimbursement for travel expenses, and benefits. If there is an inequality in wages between men and women, employers may not reduce the wages of either sex to equalize their pay.

An individual alleging a violation of the EPA may go directly to court and is not required to file an EEOC charge beforehand. The time limit for filing an EPA charge with the EEOC and the time limit for going to court are the same: within two years of the alleged unlawful compensation practice or, in the case of a willful violation, within three years. The filing of an EEOC charge under the EPA does not extend the time frame for going to court.

Equal Pay/Compensation and Sex Discrimination. Title VII also makes it illegal to discriminate based on sex in pay and benefits. Therefore, someone who has an Equal Pay Act claim may also have a claim under Title VII.



Other types of Discrimination. Title VII, the ADEA, and the ADA prohibit compensation discrimination on the basis of race, color, religion, sex, national origin, age, or disability. Unlike the EPA, there is no requirement under Title VII, the ADEA, or the ADA that the jobs must be substantially equal.

Reporting an Incident. If you find yourself subjected to unwanted advances, discriminatory conduct, or any form of harassment, inform the other party that this behavior is unwelcome and should be discontinued. If you're uncomfortable confronting the offending individual, contact your immediate supervisor and our Human Resources team. If you witness such actions being taken against another person, we also encourage you to report the incident to your immediate supervisor and our Human Resources team.

There's no set period of time for reporting an incident, but the sooner you bring it to our attention, the faster we can resolve the situation. We will take rapid and constructive action to correct the problem before the relationship becomes irreparably strained.

We commit to undertaking a prompt, comprehensive investigation of any complaint concerning harassment, discrimination, or retaliation. Investigations may include individual interviews and taking written statements with the parties involved, as well as potential witnesses, observers, or others with relevant knowledge of the situation.

Throughout these proceedings, we will keep all information confidential to the extent possible, understanding that some disclosures may be necessary to perform a proper investigation and ensure appropriate corrective action.

Any individual who attempts retaliation against the person reporting an incident, or those assisting in its investigation, stands in violation of Oloop policy and will be subject to disciplinary action. Individuals who report false or malicious claims of harassment, discrimination, or retaliation may also be found in violation of company policy, which could result in corrective action.

All complaints will be investigated promptly and, to the extent possible, with regard to confidentiality. If the investigation confirms conduct contrary to this policy has occurred, Oloop will take immediate, appropriate, correction action.

Corrective action and related resolutions may include training, referral to counseling, formal warnings, reprimands, withholding of promotions or pay increases, reassignment, temporary suspension without pay, or termination, as appropriate under the circumstances.

If a party to a complaint disagrees with the resolution, he or she may appeal the decision to Oloop's Chief Operating Officer.

You also should be aware that the Federal Equal Employment Opportunity Commission and state agencies, such as the California Department of Fair Employment and Housing, investigate and prosecute complaints of prohibited harassment, discrimination, and retaliation in employment. If you think you have been harassed or discriminated against or that you have been retaliated against for resisting, complaining, or participating in an investigation, you may file a complaint with the appropriate agency. The DFEH can be contacted at (800) 884-1684; or for the hearing impaired, (TTY) (800) 700-2320; or visit the department's website at www.dfeh.ca.gov. The Equal Employment Opportunity Commission (EEOC) can be reached by calling (800) 669-4000 or for the hearing impaired, (800) 669-6820. EEOC field office information is available at www.eeoc.gov.

Administrative Basics

AVAILABILITY OF OLOOP OFFICE STAFF

The Oloop corporate office, located in Aurora, IL is open Monday through Friday from the hours of 8:30am – 5:30pm CST. Our local telephone number is (630) 848-9256 and the toll-free number is (833) 706-5667.



Outside of normal business hours and in the event of an emergency, please contact us at either number and leave a voice message. Oloop's staff will be available to assist you and/or will return your call as soon as possible.

In the event of an emergency, natural disaster or other uncontrollable event, Oloop will continue to provide its services to you virtually from a location where phones and computers are functional. Oloop will do everything possible to support you in meeting your needs during any crisis situation(s). A copy of our Emergency Management Plan is available upon request.

WORK RELATED INJURIES AND/OR EXPOSURES

Oloop provides Workers Compensation insurance for its employees as required by law. It is our philosophy that if an employee is injured while at work, we intend to assist that employee to return to work as soon as possible. The employee is obligated to report a work-related injury to Oloop as soon as possible. An Injury Report Form needs to be completed by the employee as soon as possible after the injury.

Depending on the severity of the injury and when the injury is reported will determine where a physician will see the employee.

In the case of an emergency situation, the employee is advised to go to the emergency room. If it is not an emergency situation, Oloop will advise the employee where to seek medical help. The injury will be reported to the worker's compensation insurance provider who will manage the employee's return to work.

PAY SCHEDULE AND PROCEDURE

Oloop pays its healthcare providers weekly. If a scheduled payday falls on a company observed holiday, you will normally be paid on the day before or after the holiday. All required deductions, such as federal, state and local taxes, as well as all voluntary deductions, such as medical insurance, will be withheld automatically from your paycheck.

Oloop's workweek begins on Sunday at 12:01 a.m. and ends on Saturday at midnight.

HOLIDAY PAY

Holiday pay varies for each client facility. For further information on holiday pay, consult with Oloop's accounting and management team directly.

LUNCH BREAK POLICY

Oloop provides healthcare providers with meal and rest breaks as required under applicable federal and state laws. Oloop's employee agrees to clock in and out for a minimum of thirty (30) minutes and up to a maximum of one (1) hour for meal periods, unless otherwise specified by facility policy. If the facility requests you to work their lunch period due to patient care and safety, you agree to obtain a supervisor signature from a Client Manager for each applicable shift and to have the supervisor sign off their approval on the sign-in sheet in the nursing office. Regardless of policy or mechanism used to report time, Healthcare providers must accurately report all their time worked.

Oloop will not retaliate against any employee for reporting that they believe they were not permitted to timely take or were otherwise restricted from timely taking one or more breaks.

<u>For California assignments</u>: Please review the California-specific meal and rest period policy provided separately.

TIMESHEETS



You are required to list all work hours, lunch breaks, call, and other work time on a time sheet each week. In order to receive your pay on Friday, your time sheets are due each Tuesday by 12:00 pm CST. The timesheet must be signed by the appropriate person at the client facility.

Altering, falsifying, or tampering with timekeeping records, recording on your time card time not worked, working time not recorded on your time record (i.e., working off the clock), having someone else record your time or recording another employee's time, and performing overtime work not specifically authorized in advance are all serious violations of Company policy that may result in disciplinary action, up to and including termination of employment.

TIME & ATTENDANCE

Regular attendance and punctuality are essential for the efficiency of any organization. It is expected that you report ready to work promptly at the start of your shift. Attendance is mandatory for all scheduled shifts. You must maintain your work schedule as provided by the client facility unless prior authorization for time off – whether for any absence or voluntary call off – has been cleared with both the facility and Oloop recruiter prior to the scheduled shift or call off. Tardiness could be considered an unexcused absence.

Excessive absenteeism or voluntary call offs – which is defined as two or more unexcused absences or voluntary call offs – during an assignment may result in disciplinary action up to and including termination of assignment and/or employment.

An employee will be considered to have taken an unexcused absence if the employee is absent from work during scheduled work hours without permission, including full- or partial-day absences, late arrivals, and early departures.

ORIENTATION

Hospital orientation information or requirements will be provided to you prior to assignment start by a representative of the client facility.

CLINICAL SUPERVISION

The President or Clinical Liaison provides clinical staff supervision for Oloop's healthcare professionals. The President or Clinical Liaison has an understanding of the scope of services provided by the disciplines supervised. The President or Clinical Liaison utilizes the appropriate practice acts, the professional licensing and certification boards and professional associations as clinical resources, as needed. It is the President or Clinical Liaison's responsibility to identify and report aberrant or illegal behavior to professional boards and law enforcement agencies.

FLOATING POLICY

Oloop employees may only be placed in assignments that match the job description for which Oloop assigns them. If an employee is asked to float to another department with the customer, the department must be a like department or unit and the float employee must have demonstrated previous competency and have the appropriate certifications, credentials for that department/unit. Employees should only be floated to areas of comparable clinical diagnoses and acuities.

The following procedures should be followed for healthcare professionals and nurses in particular who are assigned to an area in which they do not feel competent:

- The healthcare provider will immediately notify Oloop.
- The Oloop employee is obligated to inform the hospital of his/her professional limitations based upon the Nurse Practice Act standards and upon Oloop client contract specifications as they relate to the assignment.
- The President or Clinical Liaison at Oloop will work within the bounds of each discipline's Professional Association or State Governing Body and the client agreement to resolve the issue.



- Oloop will pay healthcare professional for hours worked up until the end of his/her shift.
- Oloop will pay nurse for hours worked up until the end of his/her shift.

Code of Business Ethics

The first element of the Code of Business Ethics is putting the interests of the client facilities and ultimately the patient above our personal and individual interests. It is in the best interest of Oloop to avoid conflicts of interest between the client hospital, healthcare providers, and staff.

Oloop has developed corporate compliance guidelines to supplement and reinforce our client facilities' existing policies and procedures. It is also meant to assist Oloop comply with all applicable laws, rules and regulations.

- All healthcare providers are responsible for conducting their jobs in a manner reflecting standards of ethics that are consistent with accepted criteria for personal integrity
- Preserving Oloop's reputation for integrity and professionalism is an important objective. The manner
 in which healthcare providers carry out their responsibilities is as important as the results they achieve.
- All activities are to be conducted in compliance with both the letter of the law and spirit of the law, regulations, and judicial decrees.
- No healthcare provider should, at any time take any action on behalf of Oloop, which is known or should be known to violate any law or regulation.
- Information about healthcare provider's medical condition and history is required during the hiring
 process. Oloop recognizes this health information and electronic information must be held securely and
 in confidence. It is the policy of Oloop that healthcare providers' specific information is not to be
 released to anyone outside of Oloop without a court order, subpoena of applicable statute.
- Marketing materials, regardless of medium, shall accurately describe the services, facilities and resources of Oloop.
- To maintain high standards of performance, Oloop employs only those individuals it believes are most
 qualified without regard to race, color, religion, sex, age, national origin, handicap or disability in
 compliance with all federal and state laws regarding discrimination.
- Oloop is committed to maintaining a workplace environment in which healthcare providers are free from sexual harassment.
- Oloop will not tolerate violence or threats of violence in the workplace, including but not limited to abusive language, threats, intimidation, inappropriate gestures and/or physical fighting by any employee.
 These actions are strictly prohibited and may lead to severe disciplinary action up to and including termination.
- Oloop recognizes that its healthcare providers and internal staff are its most valuable assets and is committed to protecting their safety and welfare. Healthcare providers are required to report accidents and unsafe practices or conditions to their supervisors or other management staff. Timely action will be taken to correct unsafe conditions.
- Healthcare providers that are licensed or certified in any profession shall follow all applicable rules and professional codes of conduct pertaining to that profession, in addition to the rules stated herein.
- Oloop prohibits the use or possession of illegal drugs and alcohol abuse on Oloop property or while engaged in company activities.
- Oloop is committed to providing initial and ongoing education for all employees regarding their responsibilities to uphold the code of business ethics and this set of Oloop's Corporate Compliance guidelines.
- Oloop prohibits internal employees to discuss bill rates of hospitals or special rates of Oloop with other healthcare healthcare providers.
- Oloop prohibits internal employees to discuss personal or business affairs of any healthcare provider (or internal employee) with any individual not directly involved with the said personal or business affair.



- Oloop is committed to protecting the privacy, confidentiality and security of personal (education, employment and health) information of its employees. This policy is designed to assure compliance with applicable state and federal laws and regulations.
- Oloop is committed to protecting its own and its clients' trade secrets, proprietary information, and other internal information.
- It is Oloop's desire to provide only authorized third parties with information whenever requested while committing to our responsibility to control the release of information to protect the privacy and confidentiality of the employee and/or corporate information.
- Healthcare providers are not authorized to issue any statement, written or oral, to any news media representative or grant any public interview pertaining to the company's operations or financial matters.

Any healthcare provider that becomes aware of any ethical issues or unethical practices must immediately report it to their supervisor. If the supervisor is unavailable or you believe it would be inappropriate to contact that person, because of their involvement in the situation, you should immediately contact the Oloop Corporate Office or any other member of management. Any healthcare provider can raise concerns and make reports without fear of reprisal or retaliation.

All reports and inquiries are handled confidentially to the greatest extent possible under the circumstances. You may choose to remain anonymous, though in some cases that can make it more difficult to follow up and ensure resolution to the situation.

Oloop wants every healthcare provider to report violations of our ethical or other principles whenever you see them or learn about them. In fact, it is a requirement of your contract. If you do not know whether something is a problem, please ask a member of management.

Standards of Conduct

It is the responsibility of every member of Oloop's internal staff and healthcare providers to exercise appropriate judgment and conduct themselves in a manner that reflects the highest standards of professional and personal ethics and behavior.

OLOOP HEALTHCARE PROVIDER RESPONSIBILITIES

An Oloop healthcare provider is and shall be duly licensed to practice his/her profession in any State where Oloop healthcare provider is assigned and shall maintain current professional standing at all times throughout the course of their assignment. Evidence of such licensing shall be submitted to Oloop prior to commencing an assignment. Oloop healthcare provider agrees to give immediate notice to Oloop in the case of suspension or revocation of his/her license, initiation of any proceeding that could result in suspension or revocation of such licensing, or upon the receipt of any notice or any other matter which may challenge or threaten such licensing.

An Oloop healthcare provider agrees to submit to Oloop, before commencing any assignment, all requested documentation that is necessary to comply with Joint Commission, Client and Oloop expectations 10 days prior to assignment start date in assignment detail.

An Oloop healthcare provider agrees to and shall observe and comply with the applicable policies, procedures, rules and regulations established by the Client.

An Oloop healthcare provider agrees to work all scheduled shifts as directed by Client (including weekends and holidays).



An Oloop healthcare provider agrees to adhere fully with all quality assurance, peer review, risk management program or other programs that may be established by Client to promote appropriate professional standards of medical care. An Oloop healthcare provider agrees to accept both clinical and operational supervision from his/her immediate supervisor.

An Oloop healthcare provider agrees that patient records and charts shall at all times remain the property of the Client. An Oloop healthcare provider agrees to maintain the confidentiality of all information related to patient records, charges, expenses, quality assurance, risk management or other programs derived from, through, or provided by clients and all information related to this Agreement.

An Oloop healthcare provider agrees to immediately provide written notice to Oloop as to any legal proceeding instituted or threatened, or any claim or demand, made against Oloop healthcare provider or with respect to Oloop healthcare provider's rendering of services under this Agreement.

An Oloop healthcare provider agrees to notify Client of any unscheduled absence at least two (2) hours prior to beginning a shift and to notify Oloop within twenty-four (24) hours to report the unscheduled absence.

Any injury or illnesses suffered by an Oloop healthcare provider must be reported to an Oloop representative within 24 hours of the incident. If injury occurs while working, notify your supervisor immediately, and if applicable, seek appropriate medical attention and follow the Client's specific injury procedures.

Healthcare provider agrees not to disclose any Oloop trade secrets or any confidential or proprietary information of Oloop, Oloop's employees, clients, or patients of clients. An Oloop healthcare provider further agrees not to compete either as a direct competitor or with a competing company at the client assignment where the Oloop healthcare provider has been placed by Oloop. Healthcare provider agrees to refer client facility to Oloop for any future arrangements for temporary or permanent coverage that may be requested of healthcare provider by client facility, including without limitation any hospital, clinic, office, organization, individual, or group directly or indirectly owned by, operated by, or affiliated with client facility for a period of two (2) years from the last day of service.

GENERAL STANDARDS

The following set of standards are to inform and guide all staff assigned to work in hospital units. The guidelines below include but are not limited to the following:

- Patient care providers are to render care in a manner that enhances the personal dignity and rights of
 each patient. Any form of patient abuse and/or neglect will not be tolerated, and patient care providers
 are to support Oloop's policies and procedures in this regard.
- Interactions with all hospital patients, visitors, employees, physicians, vendors, etc., must be conducted
 in a courteous and professional manner at all times ensuring that Oloop is always presented in the most
 favorable light.
- The practice of counseling of the patient regarding personal problems and/or participation of the Oloop
 patient care provider in conversations with patients about topics not relevant to the plan of care is
 discouraged and unacceptable.
- Patients are to be dealt with equally and fairly and the selection of "favorites" is not acceptable.
- Appropriate language is to be used at all times when an Oloop patient care staff member is at a Oloop client facility, and in any patient care area private and/or public. Abusive, profane, threatening, demeaning, language resulting in violation of HIPAA regulations or compromising patient confidentiality can result in immediate termination.
- Touching patients, except in the direct delivery of care or by a greeting, is prohibited.
- Socializing with patients and/or patient's significant others outside of the facility is unacceptable.
- Socializing with patient's and/or patients' significant others after discharge from the Hospital is prohibited. Staff are not to call, date, nor develop personal or social relationships with patients, former patients, or family/significant others of patients, including giving of personal information or residential phone numbers. Staff should discuss with their manager any matter of concern regarding their contacts



- with current or former patient/family members of patient's significant others.
- All staff will uphold all rules and regulations related to patient confidentiality in all areas including patient care, public, and non-patient care areas. These rules and regulations include but are not limited to the following:
 - Patient care providers are not to divulge to anyone any information or records concerning any patient without proper authorization. Unauthorized release of confidential information may constitute ground for termination and/or civil action.
 - Conversations regarding patients are not to be held in the presence of other patients or any other person not privileged to this communication.
 - o Problems of a patient are not to be discussed with another patient.
 - Patients are not to be named or discussed with anyone in or outside of the facility who does not have the legal right to receive information about the patient.
- Personal problems, concerns or personal life information of patient care providers are not to be discussed with any patient, patient group, or family/significant others.
- Staff is not to discuss disagreements or criticize other patient care providers or physicians within the earshot of patients/families/significant others. A professional difference of opinion must be discussed in an appropriate private space.
- Behavior in patient areas and at the nurses' station shall be oriented toward patient care. Personal reading and conversations, including personal phone calls, are not to be conducted in these areas.
- Healthcare providers must avoid any situation, which involves a possible conflict between their personal
 interests and shall not solicit and are encouraged not to accept gifts or compensation of any kind from
 any individual outside of Oloop as a consequence of their position at Oloop.
- Any inappropriate interactions between patients and staff, staff and staff, or staff and others within the
 hospital will be met with investigation and quick response within the framework of Oloop policy and
 procedure.
- Employees who are licensed or certified in any profession shall follow all applicable rules or professional codes of conduct pertaining to that profession, in addition to the rules stated herein.
- All Oloop patient care staff will be expected maintain English proficiency standards and use English exclusively during all paid working hours.
- The client's name badge must be worn at all times while on assignment, above the waist with name and title fully visible.
- While at the hospital, all employees must follow these basic rules:
 - Eating and drinking are only permitted in the cafeteria, designated employee lounges, unit conference rooms and in private offices, when not in use for patient care.
 - Sleeping is not permitted during paid working hours.
 - Personal phone calls on the unit during work time are prohibited, except in emergency situations
 - Assigned duties must be carried out in a timely, efficient manner as directed or delegated.
 - When entering a patient room and/or when greeting a patient, practice the following.
 - Knock before entering
 - Greet the patient by name
 - If it is first contact of the day, introduce yourself by name and title
 - Tell the patient why you are in the room
 - When exiting a patient room, Oloop patient care staff are expected to:
 - Inform the Patient / Family that you are leaving
 - State the time you expect to return
 - Ask if there is anything the patient/family needs before you leave

DRESS CODE/FINGERNAIL POLICY

Dress code policy must be followed at all times while on the hospital premises. The Oloop dress code for healthcare providers includes but is not limited to the following:

• Clothing must be clean, neat, and allow for quick, efficient movement as necessary in the performance of job duties, including emergencies. Professional healthcare attire is acceptable.



- Unacceptable attire includes but is not limited to:
 - Bare midriffs
 - Low cut, tank, tube or sleeveless tops
 - o Transparent, provocative, excessively form fitting or revealing clothing
 - Mini skirts
 - Sweat (warm-up) shirts or pants
 - Clothing with printed messages, caricatures or pictorial representations (e.g., university logos, beverage cans, and cartoon characters) applications that have the potential of falling off (e.g. sequins, glitter) shorts. Note: business attire that is identified by small logo (e.g. Polo insignia) is excepted.
 - Denim jeans (any color).
 - o Spandex tights or leggings.
 - o Fishnet stockings.
 - Hats (other than nursing caps).

Note: Exceptions to these rules may be made with the written approval of the manager when the job expectations demand different attire.

- Jewelry is to be kept at a minimum and be in keeping with the general safety and infection control practices for the employee and the patient. Long dangling earrings, large or excessive necklaces and/or bracelets and sharp rings are not acceptable.
- Fingernails must be kept short, clean and natural; no artificial applications are to be worn.
- Hair must be neat and well-groomed.
- Shoes must be clean, in good repair, provide good support and protection and allow for quick and
 efficient movement as necessary in the performance of job duties, including emergencies. Heels should
 not be more than two-and-a-half inches high. Open-toed and open-back shoes are not permitted.
 Socks or stockings must be worn at all times.

CUSTOMER SERVICE

It is important for all Oloop healthcare providers to promote our culture of service excellent while on assignment at a client facility. Every time you interact with a customer and patient, you are representing Oloop.

Behaviors of Exceptional Customer Service

- 1. Take pride and joy in creating a positive experience
- 2. Smile and be friendly
 - a. Make eye contact
 - b. Give a genuine warm greeting, using patient/customer name when possible
 - c. Be positive, talk positively
 - d. Respect patients and co-workers
 - e. Take ownership: you are responsible for safety, cleanliness and confidentiality

Standards of Service Excellence

- 1. Use L.E.A.P: if you receive a patient complaint, OWN IT!
 - a. L Listen
 - b. E Empathize
 - c. A Ask questions
 - d. P Produce a solution
- 2. Customer perceptions are reality: Deliver service the customer wants (not what you think they want)
- 3. Provide SMART feedback to team members. Everyone wants feedback. Build positive relationships with coworkers by recognizing their strengths, successes and weaknesses. Be:
 - a. S Sensitive
 - b. M Meaningful
 - c. A Accurate



d. R - Reinforcinge. T - Timely

TELEPHONE COURTESY

Telephone courtesy guidelines include but are not limited to:

- Answering the phone, preferably by the third ring.
- Identify yourself by giving your department and name.
- Identify the caller and what they are requesting.
- When leaving the line, before placing the caller on hold, ask the caller if he/she can hold the line and wait for the caller's response.
- When returning to the line, thank the caller for waiting.
- When you give the call to another person, inform them both that they have a call and who the caller is.
- Try not to leave the caller holding for more than thirty (30) seconds. If you have to handle several calls
 at the same time or are unable to find the requested information or person quickly, ask if the caller would
 prefer to wait or to be called back.
- If the person receiving the call is not available, advise the caller of this and offer the options of speaking with someone else or leaving a message.
- After taking a message, repeat the message to the caller to confirm that you have taken it down correctly and thank the caller.
- When transferring a call, let the caller know that you are transferring the call and why. Also, identify the extension to which you are transferring in case the caller is inadvertently disconnected.
- Allow your voice to reflect courtesy and a smile. What and how you say what you say makes a difference.
- Employees are to seek guidance from their manager when there are questions, concerns or problems with these rules or any other part of their employment.

Any violations of the Code of Conduct will be investigated and may result in Disciplinary action up to and including termination, per Oloop Policy and Procedures.

SUBSTANCE ABUSE: DRUGS IN THE WORKPLACE

Oloop believes that maintaining a workplace that is free from the effects of drug and alcohol abuse is the responsibility of all persons involved in our business, including Oloop healthcare providers and clients.

The use, possession, sale or transfer of illegal drugs or alcohol on company property, in company vehicles, or while engaged in company activity is strictly forbidden. Also, being under the influence of drugs or alcohol, while on company property, in company vehicles, or while engaged in company activities is strictly forbidden. A violation of this policy will result in disciplinary action up to and including termination. Depending upon the circumstances, other action, including notification of appropriate law enforcement agencies, may be taken against any violator of this policy. In accordance with the Drug-Free Work-Place Act of 1989, as a condition of employment, patient care providers must comply with this policy and notify management within five (5) days of conviction for any use of, or distribution of a controlled substance. Failure to do so will result in immediate termination of employment pending the outcome of any legal investigation and conviction.

For the protection of our healthcare providers, the public and to ensure an environment as free from the influence of illegal drugs as is reasonably and practically possible, the company requires a pre-employment drug screen, annual drug employment screen and reserves the option to conduct a "for cause" drug screen for the presence of illegal drugs under certain conditions. Consent to the testing program will be a condition of further employment of each and every healthcare provider. If any director, manager, supervisor or other company officer or client representative has any suspicion that a healthcare provider under his or her supervision may be affected by or under the influence of illegal drugs, the healthcare provider under suspicion will be asked to undergo a laboratory test to determine the presence of illegal drugs. Refusal to take the test will subject the healthcare provider to immediate termination. Additionally, consistent with the law, drug and alcohol screening tests will be given after accidents or near misses, or upon reasonable suspicion of alcohol or



drug use, when a client requires pre-assignment testing, or upon any other circumstances which warrant a test.

SEXUAL AND OTHER UNLAWFUL HARRASSMENT

Oloop is committed to providing a work environment that is free from all forms of discrimination and conduct that can be considered harassing, coercive, or disruptive, including sexual harassment. Actions, words, jokes, or comments based on an individual's sex, race, color, national origin, age, religion, disability, sexual orientation, or any other legally protected characteristic will not be tolerated.

Sexual Harassment is defined as unwanted sexual advances, or visual, verbal, or physical conduct of a sexual nature. This definition includes many forms of offensive behavior and includes gender-based harassment of a person of the same sex as the harasser. The following is a partial list of sexual harassment examples.

- Unwanted sexual advances—verbal and/or non-verbal.
- Offering employment benefits in exchange for sexual favors
- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct that includes leering, making sexual gestures, or displaying of sexually suggestive objects or pictures, cartoons or posters.
- Verbal conduct that includes making or using derogatory comments, epithets, slurs, or jokes.
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually
 degrading words used to describe an individual, or suggestive or obscene letters, notes, e-mails or
 invitations.
- Physical conduct that includes touching, assaulting or impeding or blocking movements.

Unwelcome sexual advances (either verbal or physical), requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

- Submission to such conduct is made either explicitly or implicitly as term or condition of employment;
- · Submission or rejection of the conduct is used as a basis for making employment decisions, or
- The conduct has the purpose or effect of interfering with work performance or creating an intimidating, hostile, or offensive work environment.

Upon experiencing or witnessing sexual or other unlawful harassment in the workplace, report it immediately to your supervisor. If the supervisor is unavailable or you believe it would be inappropriate to contact that person, you should immediately contact the Oloop Corporate Office or any other member of management. You can raise concerns and make reports without fear of reprisal or retaliation.

All allegations of sexual harassment will be quickly and discreetly investigated. To the greatest extent possible, the alleged victim's confidentiality, that of any witnesses, and the alleged harasser will be protected against unnecessary disclosure. When the investigation is completed, the alleged victim will be informed of the outcome of the investigation.

Any supervisor or manager who becomes aware of possible sexual or other unlawful harassment must immediately advise the President or any member of management so the allegation can be investigated in a timely and confidential manner. Anyone engaging in sexual or other unlawful harassment will be subject to disciplinary action, up to and including termination of employment.

PHYSICAL ASSAULT/WORKPLACE VIOLENCE

Oloop is committed to providing a safe and secure workplace and an environment free from physical violence, threats and intimidation. Healthcare providers are expected to report to work to perform their jobs in a nonviolent manner. Conduct and behaviors of physical violence, threats or intimidation by an employee may result in disciplinary action up to and including discharge and/or other appropriate action.



Oloop will not permit employment-based retaliation against anyone who, in good faith, brings a complaint of workplace violence or who speaks as a witness in the investigation of a complaint of workplace violence.

Definitions

Workplace violence is any physical assault, threatening behavior or verbally abusive remark that is made in the workplace and/or effect the workplace behavior of an employee, which includes but is not limited to:

- 1. Verbal Abuse: Any verbal expression issued with the intent of creating fear or intimidation in another individual, or group of individuals, or verbal remarks or comments expressed in a loud, harsh or threatening tone of voice or in a joking manner within the workplace.
- 2. Physical Abuse: Any intentional movement of the body, which may include touching, gestures, pushing, striking, stalking or any unwanted intrusion of "reasonable space" of an employee. Any intentional use of any object toward an individual.
- 3. Creating a Hostile Work Environment: Any intentional nonphysical action that can be considered intimidating or harassing with the intent of creating an environment that has the purpose or effect of unreasonably interfering with an individual's performance of where behaviors create hospital or threatening environment.

Responsibilities

- Management: Management will foster an environment that is safe and free from workplace violence and will take action immediately to reduce the effects of workplace violence and/or verbal or physical abuse.
- 2. Healthcare provider: Healthcare providers will conduct themselves in such a way to reduce the possibility of any conflicts or acts that would create a violent, abusive or unsafe workplace environment for themselves or others. Healthcare providers will notify management of workplace violence incidents, which have occurred on or off-site that has the potential of impacting the work environment. Healthcare providers will remove him/herself from any situation that may result in workplace violence. This means that if confronted with a potential situation involving workplace violence, a healthcare provider must make a serious attempt to retreat from the situation and report to management.

Complaint Resolution (Staff and Customer)

A Customer Service Complaint is any complaint and/or concern from one of our valued customers regarding a situation or incident that results in dissatisfaction of that customer. The purpose of our complaint policy is to:

- To have a positive impact in improving customer service and satisfaction.
- To understand the causes that underlie a complaint and to focus on making changes to systems and processes to reduce the probability of a similar complaint in the future.
- To prevent potentially compensable events and to protect corporate financial resources potentially jeopardized by customer dissatisfaction.
- To analyze and trend data to identify opportunities for organizational performance improvement.

All Oloop patient care providers and internal office staff are entitled to full and equal accommodations, advantages, facilities, privileges and services provided by the company.

Oloop accepts complaints from persons who believe that they have experienced a violation of their rights. The following guidelines shall be followed in resolving complaints.

- Complaints must be filed within 30 days of the alleged act.
- The complaint is the written document that describes the occurrence and why the person filing the complaint believes the action or incident was in violation of his/her rights.
- An individual seeking to file a complaint needs to contact Oloop management. An intake interview or
 phone interview will be conducted with the complaining party.



- After a careful screening process, the complaint is investigated to determine if there is sufficient
 evidence to support the allegation. The complaint documentation must contain a claim which
 constitutes a violation of the complaining person's rights.
- A complaint may be settled at any time after it is filed. Opportunities will be given to all parties involved to ask questions, provide information, and suggest witnesses in order to resolve the complaint.
- As the investigation proceeds, individuals will be interviewed, and pertinent records and documents will be reviewed.
- The person filing the complaint must cooperate fully by providing accurate information and by supplying documents to support the allegations.
- All information gathered in the course of an investigation is subject to disclosure unless otherwise protected by the individual's right to privacy (e.g. medical records).
- If the complaint is substantiated, a reconciliation conference to settle the complaint will be scheduled.
 Settlement terms may require:
 - o Restoration of previously denied rights.
 - Compensation of any out-of-pocket losses incurred by person filing complaint
 - o Correction of other harm(s) resulting from the violation(s).
 - Modification of practices that adversely affect persons protected under law
 - o Other actions to eliminate the effects of violation of rights.

Our goal is to always provide you with a consistent level of service. If for any reason you are dissatisfied with our service or the service, we encourage you to contact the Oloop Management to discuss the issue. Oloop has processes in place to resolve complaints in an effective and efficient manner. If the resolution does not meet your expectation, we encourage you to call the Oloop corporate office at (833) 706–5667. A corporate representative will work with you to resolve your concern. Any individual that has a concern about the quality and safety of patient care delivered by Oloop health care professionals, which has not been addressed by Oloop management, is encouraged to contact the Joint Commission at www.jointcommission.org or by calling the Office of Quality Monitoring at 630.792.5636. Oloop demonstrates this commitment by taking no retaliatory or disciplinary action against employees when they do report safety or quality of care concerns to the Joint Commission.

Human Resources: Employment Application Process

In keeping with our standard of excellence, Oloop's initial application process and ongoing quality assurance initiatives are designed with the primary goal to provide the highest quality of nursing professionals possible. Our objectives include:

- To recruit and employ those professionals who are dedicated to quality care with proven skill histories.
- To provide a thorough orientation for each nurse so that he/she may perform his/her work in a safe and
 effective manner.
- To provide consistent opportunities for staff education via our in-service training and staff development program.
- To monitor the quality of nursing performance through regular on-site evaluations
- To work closely with clients while modifying our service concepts to meet their needs.

Each applicant undergoes a stringent screening process to verify skills and commitment to nursing excellence.

Proof of Citizenship or Ability to Work as Required by Law

Oloop verifies eligibility to work in the United States. The U.S. Immigration and Naturalization Service require that employees show proof of citizenship/eligibility to work by completing an Employment Eligibility Verification



Form (I-9). Failure to produce the necessary proof according to the applicable laws will result in the postponement of employment.

Proof of Identity

In accordance with the Joint Commission, the Company requires that every employee bring certain documents with them on the first day you report to your assignment. The documents required include a valid picture ID issued by a state, federal, or regulatory agency, original nursing license (if applicable), and required credentials for the assignment (as applicable).

Background Checks

Oloop may perform criminal background checks on applicants, which may include a felony and misdemeanor search in the state the applicant resides and may also include states and counties of residence/employment for the previous 7 years when specified in the written agreement between Oloop and its clients. Criminal background checks can also be conducted post-employment based upon a reasonable suspicion of criminal activity.

In addition, Oloop verifies that applicants are not included in the Office of Inspector General's (OIG) or the Excluded Parties List System (EPLS) databases of excluded providers.

COVID-19 Credentialing Extension Policy

Due to the COVID-19 virus pandemic, the various authorities and regulatory bodies have taken actions in exercising regulatory flexibilities to help healthcare providers enter into assignments as rapidly as possible to treat patients during the spread of 2019 Novel Coronavirus Disease (COVID-19).

As a result, the following blanket waivers are in effect, with a retroactive effective date of March 1, 2020, through the end of the emergency declaration. The following will be waived for 60 days after the state of emergency is lifted in your area.

- BLS/CPR/ACLS/PALS/NRP/Fire Cards (including any other expiring specialty certification)
- Background Checks
- Health Screening
- Out of State Licenses As pertaining to the location of practice during the state of emergency.
 Healthcare provider must obtain the license for the state in which they are working or no longer work past the date of the ending of the local state of emergency

If the local (state, county city) state of emergency is enforced longer than the national state of emergency Oloop will utilize the end date of the local state of emergency to enforce the 60-day credentialing deadline. If credentials were due during the time period of the state of emergency, the *healthcare provider* would have an additional 60 days to become compliant.

License/Certification/Education Verification

Applicants may be required to provide valid, original professional licenses to practice their profession in the state of the assignment, Basic Cardiac Life Support (BCLS) certification and any other professional certifications required for the practice of their specialty when specified in the written agreement between Oloop and its clients. Oloop conducts primary source verification of professional licenses in all states where Oloop is employing the provider or offering placement for the provider, with the appropriate licensing bodies to verify issue date, expiration date, active status of license and to determine if a license has ever been suspended, revoked, restricted, reprimanded, sanctioned or disciplined. Any disciplinary action on a professional license can be terms for non-employment with Oloop and falsification of any documentation will render applicant completely ineligible for employment with Oloop.

Positions that require a specific educational requirement and/or certification must have verification of such. Where education and licensure are required, but the license may not be obtained without meeting the education requirements, it is not necessary to confirm education, but only to verify the license (Specific



example would be an RN where state licensure is required and completion of an approved nursing program or completion of a certain number of continuing education units. In this case, the individual may not obtain state licensure or renewal without completion of an approved program or continuing education units, therefore only license verification would be required. If the position requires state licensure as an RN and a Master's degree, then both the licensure and the education would need to be verified).

It is the employee's responsibility to maintain a current valid license. Failure to do so will result from removal from duties and progressive discipline. Employees are required to immediately notify Oloop if a license/certification is suspended or revoked prior to education.

Reference Checking

Oloop verifies at least one reference from previous employers or from clinical peers that may provide information related to the applicant's knowledge and applied job skill proficiency or confirm dates of employment.

Pre-Employment Skills and Competency Assessment

To ensure that work is performed safely and efficiently in the hospital setting, all applicants are required to complete a competency self-assessment for every unit and specialty to which they will be assigned. All current competency assessment tools are maintained in their personnel file.

Applicants must also complete a competency examination for every specialty to which they would like to be assigned and receive a passing score of at least 80%. Any applicant not receiving a passing score on their first time will be given one additional opportunity to re-take the competency exam and pass. Failure to achieve a passing score of at least 80% within the first two attempts is automatically ineligible for employment with Oloop in addition, all staff must complete a Pharmacology examination and receive a passing score of at least 80%. Any applicant not receiving a passing score on their first time will be given one additional opportunity to retake the Pharmacology exam and pass. Failure to achieve a passing score of at least 80% within the first two attempts is automatically ineligible for employment with Oloop.

Health Screening

Applicants may need to go through a screening process when specified in the written agreement between Oloop and its clients, to demonstrate that they are free from communicable disease and are free from any health impairment that is of potential risk to the patient, caregiver, other employees, or that may interfere with the performance of duties. All applicants may need to provide:

- Clearance for Work: are only required when specified in the written agreement between Oloop and its clients. If required, the applicant will submit a written clearance for work conducted within the last twelve months prior to hire date. The Clearance for Work shall include whatever specifications are in the written agreement between Oloop and its clients, which may or may not include a medical history, physical examination, laboratory work as indicated, and a written report to indicate that the employee is physically and medically qualified to perform the duties to be assigned. In addition, annual physicals are required thereafter
- Tuberculosis Test: are only required when specified in the written agreement between Oloop and its clients. TB tests if required may need to be conducted within the last twelve months prior to hire date. The TB test may show a negative result. Applicants who test positive as a tuberculin reactor are required to submit documentation of a negative chest x-ray showing no abnormalities and/or provide proof of prophylactic antibiotic therapy. One clear chest x-ray is required for individuals following a positive skin test or documented history of positive skin test, repeat chest X rays thereafter are not required for those who present positive skin results, repeat chest x rays are only required when specified in the written agreement between Oloop and its clients. Applicants with positive TB results must also complete a TB questionnaire upon hire and annually thereafter when specified in the written agreement between Oloop and its clients.



- Vaccinations: are only required when specified in the written agreement between Oloop and its clients.
 If required the applicant will Submit proof of exposure to or immunization to Rubella, Rubeola, mumps, and Varicella zoster.
- Drug Test: are only required when specified in the written agreement between Oloop and its clients. If required the applicant will submit a drug screen that may screen any or all of the following: amphetamines, barbiturates, benzodiazepines, cannabinoids, cocaine, meperidine, Methadone, Opiates, Phencyclidine, Propoxphene.
- Hepatitis B: are only required when specified in the written agreement between Oloop and its clients.
 Must provide proof of vaccination to Hepatitis B or sign waiver/declination. The Hepatitis B vaccine and
 vaccination series shall be made available at no cost to all employees. Employees shall not receive the
 vaccination if they have previously received the Hepatitis B vaccination series or have antibody resting
 which reveals the employee is immune or for whom the vaccine is contraindicated for medical reasons.

*** Please note that random drug screening and drug screening for cause may occur at any time.

Interview and Education

Applicants whose qualifications are in question are interviewed by the President or Clinical Liaison. Interviews are designed to determine applicant's knowledge, competence and skills in specified areas of expertise. Interviews are based on actual events and circumstances that applicants are likely to encounter in the work environment.

Applicants are also oriented to Oloop's general policies and procedures, as well as specific administrative policies on overtime and scheduling. Orientation for select hospitals is also provided, as specified by select client hospitals.

Applicants are also oriented and asked to acknowledge their comprehension of a variety of topics, including, but not limited to:

- Medication: administration, safety and prevention of errors
- Abuse: Child, elder and reporting, SCAN
- Sexual and domestic violence, assault, rape
- Drugs in the workplace, workplace violence
- Safety: electrical, fire, environmental, safety signals
- Hazardous materials
- Infection control and CDC Hand Guidelines
- OSHA and bloodborne pathogens
- Dress code and fingernail policy
- JCAHO education, National Patient Safety Goals, List of Abbreviations/Do-not-use
- Patient rights/advance directives
- Emergency preparedness
- End-of-life care
- Code situation policies
- Sentinel event policies and procedures
- Restraints
- Age-specific education
- HIPAA
- Pain Management
- Body Mechanics
- Documentation: of patient care, transcribing of physician orders
- Conscious Sedation
- Patient safety and education
- Fall prevention



The completion of orientation shall be documented and signed by the applicant. And the form will be retained in the employee's personnel record.

Maintaining Nursing Personnel Files

All personnel files are maintained by HR, HR monitors relevant requirements and expirations of any requirements. Requirements are kept current through daily alerts of soon-to-expire or expired requirements.

Orientation

Oloop will provide all new employees with an orientation to the company's policies and procedures. Each employee will receive an Employee Handbook.

Some facilities require some form of orientation. The amount of time required by each facility varies. Some facilities require computer training classes and orientation prior to the first shift worked. The Recruiter will explain required orientation to all employees prior to scheduling first shift with a facility. Orientation time worked at the facility is paid at the orientation rate. (Usually less than regular pay rate)

Some facilities require that their specific pre-employment orientation "packets" be completed by the prospective caregiver at Oloop before the first shift is worked, and there is no pay for this required activity.

The first time you visit a facility the following guidelines should be followed:

- Report approximately one (1) hour early for orientation (it may vary for each facility).
- Carry photo ID for evidence of identity when reporting for assignment
- Take your nursing license and certifications with you
- Report to the appropriate supervisor
- It is expected that the healthcare practitioner locates and comply with the facility policy and procedures manual, locate fire pulls, crash cart, med. room, linen cart, and appropriate exits before your shift starts.
- Always dress in proper attire when working at the facility. Orientation is only paid when the time has been properly verified by facility staff.

Occasionally, an Oloop healthcare provider may show up early as directed for orientation shift and no one is available for orientation. Please take it upon yourself to utilize this time to become familiar with the floor layout and the location of vital items you may need in order to function effectively on your shift. It will be to your advantage to have knowledge of the location of the policy and procedures manual, fire pulls, crash cart, med. room, linen cart, and appropriate exits prior to the onset of your shift.

Oloop attempts to provide a comprehensive and thorough pre-employment orientation and in service training that reflects current compliance and promotes safe healthcare delivery. The program includes, but is not limited to the following:

- Age Specific
- Disaster Preparedness
- Cultural Diversity
- Environmental Safety
- Hazardous Chemicals
- HIPAA
- Infection Control/Blood borne Pathogens
- Abuse
- Domestic Violence
- Ethics for Healthcare
- Annual National Patient Safety Goals
- Pain Awareness
- Patient Restraints



- · Patient Rights
- Workplace Violence

Performance Improvement and Education Program

The purpose of performance management is to enhance the knowledge, skills and behaviors of all employees. This is accomplished by providing a means of measuring employee's' effectiveness on the job; identifying areas of development where employees are in need of training, growth, improvement and/or additional resources; maintaining a high level of motivation through feedback with management and establishing individual performance goals.

INITIAL ASSESSMENT

Upon hire, one of Oloop's Recruiters must inform new hires of all the competencies that must be met. For the initial assessment, the competency self-assessments will serve as the baseline assessment. Review and education for errors on any competency exams, pharmacology exams and additional examinations will also serve as areas of improvement.

QUARTERLY ASSESSMENTS

Oloop has attempted to implement a continuous, systematic and coordinated approach to measure and assess hospital's feedback on all agency personnel being utilized. The following assessments are utilized to ensure employee performance and customer satisfaction:

 Caregivers are assessed by the charge nurse, nurse manager or client designee once during their assignment or at least quarterly. Assessment focuses on professionalism, safety, patient care, compliance, assessment, planning and documentation.

Any unsatisfactory scores will be reviewed and discussed with each nurse and methods for improvement recommended by Oloop's President or Clinical Liaison. For more information on Oloop's Progressive Discipline Program, please see Progressive Discipline Program.

PERIODIC ASSESSMENTS

Oloop's President or Clinical Liaison conducts annual assessments of all staff. Quarterly performance evaluations are solicited via phone calls from to review clinical performance based on client feedback. The President or Clinical Liaison and clients evaluate employee job performance based on the functions and standards as outlines in the job descriptions. The President or Clinical Liaison and employee will identify strengths, accomplishments and areas for improvement and development. All hospital reviews, including initial and random assessments are also incorporated into the ninety-day and annual performance review. Employees will also update their competency self-assessments at this time.

If Performance Improvement is required, written recommendations identifying the performance expected will be created and will be used to gain the employee's commitment to perform to those expectations. The President or Clinical Liaison will provide written coaching, resources and suggestions to assist the employee in working toward the performance expectations established in this phase. In the event that a Performance Plan is created, it is expected that the President or Clinical Liaison conduct Progress Checks, or informal reviews of performance to determine if the agreed-upon goals and objectives are being achieved, to recognize achievements, to discuss developmental needs, and/or to provide assistance in the accomplishment of performance goals.



EMPLOYEE PERFORMANCE REVIEW

- Every healthcare professional employed by Oloop, who is currently working <u>and</u> has worked in the last year, will have an annual performance evaluation carried out by the Oloop, during the month of December or at the anniversary of their date of hire.
- Traveling providers are eligible for annual evaluations if the provider has worked a minimum of one 13week assignment during the preceding year and are active at during the current year in at the anniversary of their date of hire.
- Per Diem providers are eligible for annual evaluations if the provider has worked a minimum of 8 hours during the preceding year and are active during the current year at the anniversary of the date of hire.
- Oloop will attempt to obtain feedback from client representatives regarding clinical staff competence and ongoing performance of professional employee. Unfortunately, some clients will not cooperate with Oloop in this regard, so Oloop conducts phone solicitation of feedback from its clients.
- Feedback from our clients regarding clinical and/or professional performance is addressed with our employees immediately. Follow-up with our clients is completed within an appropriate time frame.
- Annual skills checklists which apply to specialty area of work will be completed by every health professional employed by Oloop.
- When training needs are identified, an opportunity to complete the training will be provided at the earliest possible occasion.
- The company assesses aspects of employee's competence at hire, at performance evaluation and as needed or required by state licensing agencies, to ensure that employees have the skills or can develop the skills to perform and continue to perform their duties.
- President or Clinical Liaison is responsible to ensure that any areas of development that are identified are addressed.

EDUCATION

Ongoing continuing education is the responsibility of Oloop employees to ensure that all clinical staff has a current knowledge and practice base. Oloop maintains information on available resources for BLS, ACLS, PALS, etc. The following online education programs are also available for continuing education; however this is not an inclusive list of available resources: www.nursetesting.com, www.lww.com. Evidence of continuing education and annual required in–service education are part of the ongoing competency assessment program and will be maintained in your personnel file. Please provide Oloop with copies of your continuing education certificates.

DISCIPLINARY ACTION

Oloop has established workplace standards of performance and conduct as a means of maintaining a productive and cohesive working environment. A positive, progressive approach is taken to solve discipline problems, which appeals to an employee's self-respect, rather than create the fear of losing a job. Our system emphasizes correction of the offensive behavior. If correction of the problem and sustained improvement does not occur, termination may result.

The following may be grounds for disciplinary action, up to and including termination:

- Accepting an assignment and not reporting to work or not notifying us.
- Unauthorized possession, use, or removal of property belonging to Oloop or any client of Oloop.
- Failure to comply with all safety rules and regulations, including the failure to wear safety equipment when instructed.
- Reporting to work under the influence of alcohol, illegal drugs, or in possession of either item on company premises or work sites of client companies.
- Lewd, unacceptable behavior, possession of weapons or explosives and provoking, instigating or participating in a fight is prohibited at Oloop and/or at its client hospitals.
- Violation of the harassment policy.
- Insubordination of any kind is grounds for immediate termination. (For example, refusal to carry out your supervisor's reasonable works request).



- Leaving an assignment without notice i.e. patient or assignment abandonment.
- Falsifying records, including but not limited to time records or claims pertaining to injuries
 occurring on company premises or work sites of client companies or personnel records.
- Disclosing confidential information without authorization.
- Disregard for established policies and procedures.
- Excessive cancellations or tardiness.
- Discourtesy to clients or fellow employees.

DO NOT SEND POLICY AND PROCESS

Oloop is committed to providing a higher standard of service to our clients and to the delivery of safe, quality patient care. As an Oloop healthcare provider, you play a very valuable role in our success in delivering excellent customer service and in our ability to achieve Joint Commission Certification. We are implementing a "Do Not Send" Prevention Program.

- Below is the Termination Policy.
- Following the Termination Policy are the Do Not Send Prevention <u>Curriculum</u> and the Do Not Send Prevention <u>Quiz</u>
- You will be held responsible for the information in the curriculum and quiz in both your clinical and professional / behavioral performances every time you work for Oloop.
- Please take the quiz and return only the answer sheet to us within 14 days in the enclosed self-addressed-stamped-envelope.
- When a performance issue arises, Oloop will use the point system outlined below. As you can see, significant performance issues or ongoing performance issues could result in termination. By implementing this program, it is our goal to reduce the number of performance issues and/or Do Not Sends.

TERMINATION POLICY

The following point system is used to determine termination as a result of Do Not Sends.

1 Point Attitude / lack of professionalism / customer service

2 Points

- Clinical incompetence poor clinical performance
- Poor time management
- Medication Error
- Documentation Deficiencies Lack of Compassion

3 Points

- Danger to patient.
- No call No show.
- Departing facility before end of shift secondary to dissatisfaction with assignment.
- Do Not Send from any Travel Assignment regardless of origin

5 Points

- Illegal Behavior (Includes false identity; falsified documentation, use of or distribution of controlled substances etc.)
- Pt. abandonment. When nurse is under investigation for above behavior they will be considered terminated until exonerated from all accusations.
- Error resulting in Pt. Death or Permanent physical or mental damage
- Self-terminating travel assignment without proper notice to facility or Staffing Agency.



A nurse who receives 5 points will be considered for termination. Any nurse involved in illegal activity will be terminated immediately.

Please feel free to contact Oloop's corporate office if you have any questions

Reporting Any Issues

Assignment Issues

Issues may arise while an employee is on assignment for Oloop. As a representative of Oloop and as a responsible and mature nursing professional, it is important that professionalism and integrity are maintained throughout the conflict resolution process and that above all, patient safety is the priority.

Common issues that may arise are:

- Conflict with hospital staff
- Conflict with patient and/or patient family members
- Unfair patient assignments, or "dumping"
- Assignment to a unit for which you are incapable of safely performing your duties

In the event of any of the above events:

- Contact the nursing supervisor for assistance
- If escalation is required, contact Oloop for mediation
- Complete an incident report at the facility (if required)
- Complete an incident report at Oloop (if required)

Blood Borne Exposure

An exposure incident to blood borne pathogens involves specific eye, mouth, mucous membrane, or parenteral contact with blood or other potentially infectious materials that result from the performance of an employee's duties. All employees involved in direct patient care should be familiar with appropriate decontamination procedures.

In the event of exposure to any blood borne pathogens:

- 1. Adhere to appropriate decontamination procedures
- 2. Contact the charge nurse or nursing supervisor for assistance
- 3. Inform Oloop immediately of exposure

Oloop shall make immediately available a confidential medical evaluation and follow-up the exposed individual. Post-exposure follow-up shall be:

- Made available at no cost to the employee
- Performed by or under the supervision of a licensed healthcare professional who has a copy of all relevant information related to the incident.
- Made available at a reasonable time and place.

Oloop's post-exposure and follow-up, shall include the following:

- Documentation of the route(s) of exposure, and the circumstances under which an exposure incident occurred.
- Identification and documentation of the source individual
- Collection and testing of blood for HIV and HBV serological status
- Post-exposure prophylaxis, as recommended by the U.S. Public Health Service
- Counseling
- Evaluation of reported illness



The company maintains confidential medical records for each employee with occupational exposure. Records are kept for the duration of employment plus thirty (30) years. Each record shall contain the employee's name, social security number, hepatitis B vaccine history, and a record of all post-exposure follow-up.

Clinical Incidents and Sentinel Events

As a healthcare provider, it is your duty and responsibility to promptly report any unsafe condition, sentinel event or unusual event that can result in a sentinel event. Everyone is expected to participate in maintaining a safe environment for patients, visitors, physicians and their coworkers. This means taking an active role in reporting any and all unsafe conditions, unusual or sentinel events. All such events should always be reported immediately to your charge nurse, nursing supervisor and Oloop's President or Clinical Liaison.

Clinical staff must recognize the importance of following effective procedures and are encouraged to speak up if something has compromised or might compromise patient safety and quality.

A Clinical Incident is any event or series of events that resulted in or had the potential to result in an adverse patient outcome. Clinical staff should notify Oloop of any clinical incidents that occur while on assignment, regardless of an adverse outcome.

A sentinel event is an unexpected occurrence involving death or serious physical or psychological injury, or the risk thereof. Serious injury specifically includes loss of limb or function. The phrase "or the risk thereof" includes any process variation for which a recurrence would carry a significant chance of a serious adverse outcome.

Such events are called "sentinel" because they signal the need for immediate investigation and response.

Examples of Clinical Events

- Omission of treatment
- Deviation from policy
- Medication errors
- Improper equipment usage
- IV or Blood complications
- Patient fall
- Inaccurate clinical assessment
- Patient or physician complaint

Examples of Sentinel Events

- Any patient death, paralysis, coma or other major permanent loss of function associated with a medication error
- A patient commits suicide within 72 hours of being discharged from a hospital setting that provides staffed around-the-clock care.
- Any delopement, that in unauthorized departure, of a patient from an around-the-clock care related setting resulting in death (suicide, accidental death, or homicide) or in a temporary or major loss of function.
- A hospital operates on the wrong side of the patient's body.
- Any intrapartum (related to the birth process) maternal death.
- Any perinatal death related to a congenital condition in an infant having a birth weight greater than 2500 grams.
- A patient is abducted from the hospital where he or she receives care, treatment or services.
- Assault, homicide, or other crime resulting in patient death or major permanent loss of function.



- A patient fall that results in death or major permanent loss of function as a direct result of the injuries sustained in the fall
- Hemolytic transfusion reaction involving major blood group incompatibilities
- A foreign body, such as some sponge or forceps that was left in a patient after surgery

Joint Commission's Sentinel Event Policy

The Joint Commission has defined a sentinel event policy that you should be aware of. This policy has four goals:

- To have a positive impact in improving patient care, treatment and services and preventing sentinel
 events
- 2. To focus the attention of an organization that has experienced a sentinel event on understanding the root causes that underlie the event, and on changing the organization's systems and processes to reduce the probability of such an event in the future.
- 3. To increase the general knowledge about sentinel events, their causes, and strategies for prevention.
- 4. To maintain the confidence of the public and accredited organizations in the accreditation process

In the event of deviation of practice according to the professional practice act, fraudulent behaviors, narcotic abuse or deviation and/or other aberrant or illegal behavior, each event is documented, and a report is made, which includes information from the customer. The President or Clinical Liaison reports each situation according to the guidelines of the appropriate professional association.