

## Joint Commission Policy Statement

TheraEx Staffing Service is committed to providing a higher standard of service and to the delivery of safe, quality patient care. TheraEx Staffing Service complies with the Joint Commission's Standards for Healthcare Staffing Services. As our customer, you can have confidence that the processes within AN support that the supplemental staff working in your organization have met the requirements established by the Joint Commission. To assure compliance with the Joint Commission Standards for Healthcare Staffing Services, AN provides the customer a written description of the following service features.

### 1. Subcontractors

AN will not engage subcontractors to provide Assigned Employees unless agreed to in advance by the customer.

### 2. Floating

Assigned Employees may only be placed in assignments that match the job description for which AN assigns them; if an Assigned 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. Assigned Employees should only be floated to areas of comparable clinical diagnoses and acuities.

### 3. Competency Review

It is the responsibility of AN to conduct and finalize the pre-employment assessment of the Assigned Employee's competence based on the techniques, procedures, technology and skills needed to provide care, treatment and services to the populations served by the customer upon completion of AN orientation.

It shall be the responsibility of the customer to cooperate in a review or evaluation of each Assigned Employee, relative to the employee's ability to perform specific job functions upon completion of employee's assignment or shift. AN relies on the customer's feedback in order to accurately assess and re-assess the competence of the Assigned Employee on an ongoing basis based on the customer's report of clinical performance.

### 4. Orientation of Employees

AN will provide all new employees with an orientation to the company's policies and procedures. It shall be the responsibility of customer to orient assigned employees to the facility and its rules and regulations and to acquaint them with the facility policies and procedures, including dress code, physical layout and equipment and to validate competency and ability of Assigned Employee to properly use equipment.

### 5. Employees and Independent Contractors

As the provider of staffing services, AN will be the employer of Assigned Employees and shall not by reason of their temporary assignment with the customer through AN become employees of the customer. At its sole discretion AN reserves the right to utilize Independent Contractors in addition to its employees, to assist in the provision of all agreed upon Healthcare Supplemental Staffing services.

### 6. Incident, Error, Tracking System

Upon notification of Incidents and or Errors, AN shall document and track all unexpected incidents, including errors, sentinel events and other events, such as injuries and safety hazards related to the care and services provided, utilizing its data gathering tools. Information gathered tracked and analyzed is to shared and reported appropriately to customers, regulatory bodies and the Joint Commission as required.

### 7. Communicating Occupational Safety Hazards/Events

It shall be the responsibility of the customer to notify AN within 24 hours of the event; any competency issues, incidents, and/or complaints related to the Assigned Employee and/or AN. Customer agrees to initiate communication with AN whenever an incident/injury report related to the Assigned Employee is completed

8. **Requirements for Staff Specified**

The requirements of staff sent to the customer by AN are to be determined by the customer as part of the written agreement between the two parties. It is AN'S obligation to comply with the requirements of the customer by supplying staff that have the documented competencies, credentials, health screening and experience to satisfy the requirements specified by the customer in order to deliver safe care to the population being served.

9. **Staff Matching Requirements**

AN shall verify the Assigned Employee's licensure, certification, education and work experience to assure they are competent and possess the skills and experience that match requirements for the assignment. Matching the Assigned Employee's licensure, certification, education and work experience to assure they are competent and possess the skills and experience matching the specified requirements of the assignment may include the use of new grad practitioners for Allied personnel and **non-licensed** nursing personnel such as sitters, caregivers and nursing assistants, it may also include licensed nursing personnel upon the request or approval of the customer.

10. **Conflicts of Interest**

AN to the best of its ability identifies conflicts of interest. AN discloses all conflicts of interest to its clients. AN annually reviews its relationships and its healthcare providers' relationships with vendors, clients, competitors and regulatory entities to determine conflicts of interest.

When conflicts of interest arise AN discloses this conflict of interest when appropriate to whichever client may be involved or affected. AN enforces that internal employees of AN are not permitted to maintain additional employment, accept gifts (other than those of nominal value) or to allow payment on their behalf of any travel, living or entertainment expense by any person or organization currently doing business with or seeking to conduct business with Acuity Care Services, LLC, unless approved by the client involved or potentially involved.