ALASKA NATIVE TRIBAL HEALTH CONSORTIUM

Department:	Organization-Wide Policy	Policy #01-2071
Approved By:	Consortium Executive Team	Effective Date: 6/10/2022
Policy Owner:	Ethics & Compliance Services	Last Reviewed: 6/10/2022

1. Purpose:

This policy establishes standards to allow the management of Alaska Native Tribal Health Consortium (ANTHC) Policies and Procedures (P&Ps) and department/program guidance.

2. Scope:

This policy applies to all P&Ps of ANTHC, its subsidiaries, and its affiliates.

3. Definitions:

3.1. ANTHC Board Level Policies: those policies that require Board approval, in accordance with the *ANTHC Policy Approval Matrix* (Attachment 3). These policies will be reviewed every year.

3.2. ANTHC Operational Level Policies: those policies that are approved by ANTHC Consortium Executive Team, in accordance with the *ANTHC Policy Approval Matrix* (Attachment 3). These policies will be reviewed every three years.

3.3. ANTHC Procedures: all ANTHC procedures are approved by ANTHC Consortium Executive Team, in accordance with the *ANTHC Policy Approval Matrix* (Attachment 3). These procedures are reviewed as needed.

4. Policy:

4.1. General. ANTHC P&Ps will be:

4.1.1. presented in a standard format;

4.1.2. adopted and reviewed as necessary to address organizational needs;

4.1.3. systematically maintained in a location where they can be accessed by those who need them;

    4.1.4.   compliant with all applicable laws, regulations, and accreditation standards; and

    4.1.5.   a reflection of ANTHC's Mission, Vision, and Values.

4.2.   <u>Effective Date</u>.

    4.2.1.   Unless an effective date is specified in the policy or procedure, or by the approving individual or body, it will become effective 30 days after approval. This will allow for distribution to the organizational units and members responsible for complying with or implementing the policy or procedure.

    4.2.2.   Unless otherwise required by law, regulation, or ANTHC's governing documents, all P&Ps, including those with mandatory review dates, will remain in effect until superseded, revised, or rescinded by the individual or body responsible for approving them.

4.3.   <u>Exceptions</u>. Unless otherwise stated in the document, exceptions may be granted by:

    4.3.1.   the Board Chair for Board P&Ps;

    4.3.2.   the President/CEO for policies, procedures, and department/program guidance; and

    4.3.3.   the appropriate Executive Management Team member for department/program guidance.

4.4.   <u>Board P&Ps</u>. Board P&Ps govern the actions of the Board and its members. An approval must be made by the Board and generally includes a preliminary review by the Bylaw and Policy Committee.

    4.4.1.   <u>Format</u>. Board P&Ps use the format set out in the *ANTHC Board of Directors' Policy and Procedure Handbook*. The templates identify the approver as the Board (BOD), in accordance with the *ANTHC Policy Approval Matrix* (Attachment 3).

    4.4.2.   <u>Numbering</u>. Board policies are assigned a numeric digit representing their assigned section.

    4.4.3.   <u>Effective Date</u>. Unless otherwise specified, a Board policy or procedure is effective the business day after approval. Superseded

documents are retired on the same date, and effective dates are documented on the policy or procedure.

4.4.4. <u>Review and Approval</u>. Amendments to the Board P&Ps must be approved through the process established by the Board. This generally includes a preliminary review by the Bylaw and Policy Committee and potentially other Board committees with responsibility for the relevant subject matter.

4.4.5. <u>Access</u>. The Board, and those employees who need access for their job duties, may access Board P&Ps. At the first Board meeting of the year, each Director will be given a current version, and revised versions will be distributed as needed.

4.5. <u>Organizational P&Ps</u>. Organizational policies establish general expectations for the organization and members of the workforce. Organizational procedures provide specific directions and guidance to support and implement policies. A policy may direct that implementing procedures be adopted and provide authority for their review and final adoption.

4.5.1. <u>Format</u>. Organizational P&Ps are formatted using the *ANTHC Policy Template* or the *ANTHC Procedure Template,* as appropriate (Attachment 1). The templates identify the approver as either the Consortium Executive Team (CET) or the Board (BOD), in accordance with the *ANTHC Policy Approval Matrix* (Attachment 3).

4.5.2. <u>Numbering</u>. Organizational policies are assigned a numeric digit representing their assigned section. Organizational procedures are assigned a numeric digit representing the governing policy, followed by a dash, and a second numeric digit representing the procedure number.

4.5.3. <u>Effective Date</u>. Unless otherwise specified, an organizational policy or procedure is effective the business day after approval. Superseded documents are retired on the same date, and the effective date is documented on the policy or procedure.

4.5.4. <u>Review and Approval</u>. Organizational P&Ps are reviewed every three years or as necessary. A *Review and Approval of Policies and Procedures Guide* outlines suggested review steps (Attachment 2). CET is responsible for final approval or recommendation to the Board, unless the Board has identified the policy as one requiring Board approval or the Board approval is required by a law, regulation, or accreditation standard. The Board delegates approval authority for

ANTHC P&Ps to the ANMC Joint Operating Board (JOB). Each policy document will indicate whether the organizational policy is subject to CET or Board approval.

4.5.5. <u>Access</u>. All employees may access organizational P&Ps.

4.6. <u>Department Level Policies/Standard Operating Procedures (SOPs)</u>. Departments/programs may develop more specific policies, procedures, and guidance consistent with the other guidance described in this policy.

4.6.1. <u>General</u>. Department-level policies/SOPs will be presented in a consistent format and will identify the department, program, or other area to which it applies. Department-level policies/SOPs should be organized to allow documents to be found quickly and for outdated guidance to be identified and removed. The effective date must be included within the document.

4.6.2. <u>Review and Approval</u>. Department-level policies/SOPs will be reviewed as necessary. The director who supervises the department/program is primarily responsible for initiating a review by critical stakeholders before presenting it to the appropriate executive for approval. A *Review and Approval of Policies and Procedures Guide* outlines suggested review steps (Attachment 2). Final approval will be by the individual Executive Management Team member who oversees the department/program. Upon notice of final approval, departments will forward a final copy of the policy with departmental/program guidance to the Policies & Procedures Manager. At that time, a policy number will be assigned, and the document will be uploaded to the centralized location where it can be accessed by all staff.

<u>Attachments</u>:
1) ANTHC Policy and Procedure Templates
2) Review and Approval of Policies and Procedures Guide
3) ANTHC Policy Approval Matrix

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Title:	[Title]	Page 1 of 1

Department:	Organization-Wide Policy	Policy #XX
Approved By:	Consortium Executive Team	Effective Date:
Policy Owner:		Last Reviewed:

1. **Purpose:**

    Describe what the policy is intended to accomplish. Example: "To [establish]…"

2. **Scope:**

    All members of the Alaska Native Tribal Health Consortium (ANTHC) workforce, patients, and visitors to the ANTHC campus and off campus worksites.

3. **Definitions:**

    3.1. For purposes of this policy and its implementing procedures, these terms have the following definitions.

        3.1.1. [Term] means….

4. **Policy:**

    4.1. Heading. Text

        4.1.1. Subheading. Text

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Title:	[Title]	Page 1 of 1

Department:	Organization-Wide Procedure	Procedure #XX-xx
Reference Policy:	[Title]	Reference Policy #XX
Approved By:	Consortium Executive Team	Effective Date:
Policy Owner:		Last Reviewed:

1. **Purpose:**

   Describe what the procedure is intended to accomplish. Example: "To [establish]…"

2. **Scope:**

   Describe the persons, programs, documents, and/or entities to which the procedure applies. Example: "This procedure applies to [all members of the ANTHC Board of Directors]."

3. **Definitions:**

   3.1. For purposes of this procedure, these terms have the following definitions.

      3.1.1. [Term] means….

4. **Procedure:**

   4.1. Heading. Text

      4.1.1. Subheading. Text

Review and Approval of Policies and Procedures Guide

Creating or Updating Governance Policies and Procedures

Follow these steps to create or update the P&Ps that govern the Board of Directors:

1. Recommend new or updated policy or procedure to the Policies & Procedures Manager;
2. The Bylaw and Policy Committee conducts a preliminary review, including applicable requirements and standards;
3. The Policies & Procedures Manager prepares a draft for Board approval;
4. The Board reviews the draft and discusses any questions or conflicts to be resolved;
5. The Board approves the final draft; and
6. The Policies & Procedures Manager assigns a policy or procedure number and uploads the final document to the Policy Portal.

Creating or Updating Organizational Policies and Procedures

Follow these steps to create or update the P&Ps that apply to ANTHC as a whole:

1. A leader identifies the need for a new or revised policy or procedure, validates and prioritizes that need, and recommends a review process (emergency, expedited, or regular);
2. The Policies & Procedures Manager solicits suggestions about potential stakeholders and interdependencies;
3. The Policies & Procedures Manager conducts a preliminary review, including applicable requirements and standards;
4. The Policies & Procedures Manager prepares a draft and circulates it to stakeholders;
5. The Policies & Procedures Manager compiles input into the draft; if the input conflicts or raises questions, the Policies & Procedures Manager schedules a meeting to discuss;
6. Once the draft is in final form, the Policies & Procedures Manager provides the draft and a summary to the Policies & Procedures Committee;
7. The Policies & Procedures Committee recommend the policy or procedure be sent back to stakeholders with suggested modifications or, if no modifications are required, to CET for approval;
8. Review and approval of the final draft by CET; and
9. The Policies & Procedures Manager assigns a policy or procedure number and uploads the final document to the Policy Portal.

Creating or Updating Department-Level Policies/SOPs

Follow these steps to create or update the P&Ps that apply <u>only</u> to a specific department or program:

1. The department identifies the need for a new or revised policy or procedure;
2. The department conducts a preliminary review, including applicable requirements and standards;
3. The department uses a template (Attachment 1) to draft a new or updated policy or procedure;
4. The individual Executive Management Team member who oversees the department/program reviews the draft with input from ANTHC Legal Department, ANTHC Ethics and Compliance Services, and ANTHC Executive Management Team, as appropriate;
5. Final approval by the individual Executive Management Team member who oversees the department/program; and
6. The department forwards a copy of the final document to the Policies & Procedures Manager to assign a policy or procedure number and upload the final document to the Policy Portal.

ANTHC Policy Approval Matrix

This matrix lists 2023 ANTHC Board policies and organizational policies and identifies their approval level. New policy approval levels will be based on the Policy and Procedure Authority, Policy No.01-2002.

Policy Title	Approval Level
Board of Directors' Policies and Procedures	
Behavior Standards	BOD
Code of Conduct	BOD
Compensation Review	BOD
Compensation, Benefits, and Reimbursement	BOD
Disclosure of Records and Information to Designating Entities	BOD
Email Usage	BOD
Financial Authority	BOD
Political Candidates and Campaigns	BOD
Review of Alleged Director Misconduct	BOD
Travel	BOD
Organizational Policies	
Acceptable Encryption	CET
Accounting Basis	CET
Accounting Standards	CET
Administrative Release from Duty	CET
Adoption of New Accounting Pronouncements	CET
Alaska Native and American Indian Preference	CET
Attendance	CET
Background Check (Operational)	CET
Background Check and Character Check	CET
Bank Account	CET
Bereavement Leave	CET
Breach Incident Response and Notification	CET
Breach Risk Assessment Tool	CET
Bulletin Boards	CET
Business Associates and Health Information	CET
Cellular Phone and Electronic Communication Devices	CET
Children in the Workplace	CET
CISM Confidentiality and Ethics	CET
CISM Incident Report	CET
CISM Intervention Response	CET
CISM Team Member Application, Duties, and Responsibilities	CET
Commissioned Officer Deployment	CET
Communicable Disease & Illness	CET

Communicating Health Information by Text Message	CET
Competency Assessment	CET
Conflict of Interest	CET
Consortium Purchasing and Procurement	CET
COVID-19 Employment & Timekeeping FAQs	CET
COVID-19 Vaccination	CET
Criminal History Record Information - Proper Access, Use, and Dissemination	CET
Critical Staffing Pay	CET
Data At Rest Encryption	CET
Disclosure of Records and Information	CET
Dispute Resolution	CET
Dress and Personal Appearance	CET
Drug and Alcohol-Free Workplace	CET
Electronic Health Information Security Rule - Board	CET
Electronic Health Information Security Rule - Operational	CET
Electronic Signature	CET
Eligibility for Rehire	CET
Emergency Action Plan	CET
Emergency Eyewash Shower Equipment Testing	CET
Employee Benefits	CET
Employee Contact with Media	CET
Employee Health and Healthy Workforce	CET
Employee Health COVID-19 Procedure Revised	CET
Employee Orientation	CET
Employee Recognition and Rewards	CET
Employee Request Related to Patient Care or Treatment	CET
Employment-At-Will	CET
Employment Classifications	CET
Employment of Minors	CET
Employment Separation	CET
Equal Employment Opportunity	CET
Family and Personal Medical Leave	CET
Federal Employee-Commission Corp Conversion	CET
Finance Scope of Organization	CET
Financial Authority Policy	CET
Financial Conflict of Interest	CET
Financial Reporting	CET
Financial Statement Disclosures	CET
Flexible Scheduling	CET

Flu Vaccination	CET
Fraud, Waste, and Abuse	CET
Government-Wide Sanction Screening	CET
Harassment, Discrimination, Retaliation, and Abuse of Power Prevention	CET
Healthy Food	CET
High Profile Visitor VIP Safety and Security	CET
Holidays	CET
Human Subjects Research Review	CET
Independent Compliance Audits	CET
Independent Financial Audits	CET
Information Technology Security Standard	CET
Intellectual Property Policy	CET
Intergovernmental Personnel Agreement/Memorandum of Agreement	CET
Intermittent Employee	CET
Jury and Witness Duty and Voting	CET
Leave of Absence	CET
Medical Case Reporting	CET
Military Leave	CET
Modified Duty	CET
Nepotism	CET
Network Security Management	CET
On-Call and Callback Pay	CET
Operational Privacy Practices	CET
Option to Use Leave Without Pay Instead of PTO	CET
Outside Employment and Activities	CET
Overtime	CET
Paid COVID-19 Sick Time	CET
Paid Parental Leave Policy	CET
Paid Time Off	CET
Patch Management	CET
Pay Deductions	CET
Paydays	CET
Performance Appraisal	CET
Personal Property Loss	CET
Personal Protective Equipment Program	CET
Personnel Data Change	CET
Personnel Files	CET
Physical Security Program	CET
Policy and Procedure Formulation and Approval	CET
Policy and Procedure Management	CET

Political Candidates and Campaigns	CET
Premium Pay	CET
Privacy Complaints	CET
Privacy Rule Administrative Commitments	CET
Privacy Rule Board	CET
Record Management and Retention	CET
Reduction in Force	CET
Relationships in the Workplace	CET
Release of Alaska Native Tumor Registry Data for Research or Quality Improvement	CET
Religious, Ethical, and Cultural Accommodation	CET
Remote Work	CET
Requests for Information	CET
Research Accelerated Review	CET
Research Misconduct	CET
Safety	CET
Safety Program	CET
Service Animal	CET
Solicitation	CET
Space Allocation	CET
Timekeeping	CET
Universal Masking	CET
Vehicle Use	CET
Work Schedule, Breaks, and Meal Periods	CET
Workforce Violence Prevention and Response	CET
Workplace Accommodation	CET
Workplace Violence Prevention and Response	CET