

SHIBA Volunteer Risk Program Management (VRPM)

Policy manual for volunteers, volunteer coordinators, sponsors and SHIBA partners

Updated June 2018

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Welcome

Volunteers are the foundation of our Statewide Health Insurance Benefits Advisors (SHIBA) program. With over 400 SHIBA volunteers in Washington state alone, the Administration on Community Living (ACL) created the Volunteer Risk and Program Management (VRPM) to provide all State Health Insurance Assistance Programs (SHIP) with policies and best practices to support all aspects of the Senior Medicare Patrol (SMP) volunteer recruitment, management and training.

The purpose of the VRPM is to enhance the quality, effectiveness and safety of SMP/SHIBA services by offering guidance and direction to staff and volunteers. SHIBA considers following these policies and practices critical to sustain a strong, dynamic and robust network of volunteers. See the Senior Medicare Patrol Resource Center at smpresource.org for more details on VRPM.



HHS

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Abbreviations and acronyms

ACL The Administration for Community Living (ACL), an operating division within the federal Department of Health and Human Services with headquarters in Washington, DC and regional offices in ten cities.

AoA The Administration on Aging (AoA), an agency within the Administration for Community Living, administers all programs funded by the Older Americans Act, including SMP.

AAA An Area Agency on Aging (AAA) is responsible for planning and delivery of services under the Older Americans Act for a geographic region within a state.

The Centers for Medicare & Medicaid Services (CMS) administers the Medicare program and oversees state administration of the Medicaid programs. The Center for Program Integrity (CPI) is a bureau within CMS that works with various contractors to identify potential fraud, waste and abuse in the original, fee-for-service Medicare program. CMS is responsible for overseeing the Medicare Advantage (Part C) and Medicare Prescription Drug (Part D) programs. An Administrator appointed by the Secretary of HHS heads CMS.

DSHS Washington State Department of Social and Health Services (DSHS)

The Department of Health & Human Services (HHS) is one of two departments within the executive branch of the federal government responsible for administering the Health Care Fraud & Abuse Control (HCFAC) program of which the Medicare Integrity Program (MIP) is a part. The Administration for Community Living (ACL), the Centers for Medicare & Medicaid Services (CMS) and the HHS Office of the Inspector General (OIG) are units within HHS. The Secretary of HHS holds a cabinet-level position.



DoJ The Department of Justice (DoJ) is the other federal department

that administers the HCFAC program. The Federal Bureau of

Investigation, an agency within the DoJ, works with the HHS Office

of Inspector General (OIG) to investigate health care fraud and apprehend alleged perpetrators. The DoJ's U.S. Attorney offices

throughout the country prosecute criminal health care fraud cases.

OIC Washington State Office of the Insurance Commissioner (OIC)

OIG The HHS Office of Inspector General (OIG) investigates Medicare

and Medicaid fraud, and refers criminal cases for prosecution to

the U.S. Attorney offices. The OIG has authority to issue civil

monetary penalties and exclude providers from the Medicare and

Medicaid programs.

RCW The Revised Code of Washington (RCW) is the compilation of all

permanent laws now in force.

RTC Regional Training Coordinator (RTC)

SHIBA Statewide Health Insurance Benefits Advisors (SHIBA)

SHIP The State Health Insurance Assistance Programs (SHIP) provide

counseling services to Medicare beneficiaries and assist them in applying for assistance programs, comparing and choosing health

and drug plans, and appealing claims denials.

SMP The Senior Medicare Patrol (SMP) empowers and assists Medicare

beneficiaries, their families, and caregivers to prevent, detect, and

report health care fraud, errors, and abuse through outreach,

counseling, and education.

SSN Social Security Number (SSN)

STARS SHIP Tracking and Reporting System (STARS)

VC Volunteer Coordinator (VC)

VRPM Volunteer Risk Program Management (VRPM)



Section 1.0: Introductory policies

1.1 Overall policy on engagement of volunteers

SHIBA accepts and encourages the involvement of volunteers at a range of levels and within all appropriate projects and activities. Involvement of volunteers is a key component of SHIBA.

1.2 Scope of the volunteer policies

Unless specifically stated, these volunteer policies apply to all volunteers in all programs and projects undertaken by or on behalf of SHIBA including volunteer involvement that is organized and managed by Sponsor organizations. The pivotal variable in the application of these volunteer policies is volunteers' performance of SHIBA work. Where volunteers are clearly performing what could reasonably be called "SHIBA work" under the direction and control of SHIBA, those volunteers—including paid partners and in-kind staff— and their coordination are subject to the provisions of these volunteer policies.

1.3 Compliance

Volunteers are made aware of all volunteer policies. Not knowing a policy is not acceptable if the policy has been communicated and the volunteer ought to have known. SHIBA volunteers are expected to conduct their work with a view to the larger picture of what is in the best interests of the majority of SHIBA clients, the integrity of SHIBA programming, and the long-term reputation and sustainability of SHIBA itself.

Compliance with all SHIBA volunteer policies is a minimal expectation of SHIBA volunteers. Failure to comply meets with a graduated response designed wherever possible to assist the volunteer to return to functioning inside the rules. Should reasonable efforts on the part of SHIBA prove unsuccessful, further disciplinary action is taken, up to and including dismissal.

1.4 Volunteer role classifications

These policies apply to all roles undertaken by SHIBA volunteers, whether through direct service with SHIBA or involvement in SHIBA activities via a Sponsor Location. Titles for volunteer positions in the SHIBA program are not



nationally standardized. Volunteers may be qualified to serve in one or more role(s).

1.5 Policy revision

Alterations to or exceptions from the national SMP/SHIP volunteer policies may only be granted by ACL and must be requested in advance and in writing. Matters not specifically covered in these national policies are determined at the state level by the SHIBA Program Manager, the designated coordinator of volunteers, and/or other authorized SHIBA staff.



Section 2.0: Risk management and health and safety

2.1 Risk Assessment

Every three years the Volunteer Coordinator, along with other SHIBA staff, conducts a risk assessment on the roles, work, and activities of SHIBA volunteers.

Also assessed regularly in connection with risk are training and qualification procedures, volunteer performance management, volunteer program management processes and activities, and volunteer worksite(s). Risk management strategies are implemented as needed, including, in particular, local-level procedures that identify, prevent, and reduce the incidence and impact of risk.

2.2 Insurance

Liability and accident insurance or other comparable forms of indemnification and protection may be provided through Sponsor Locations for all volunteers engaged in the SHIBA's business.

2.3 Automobile insurance coverage

Volunteers are advised to notify their own automobile insurance provider about their SHIBA driving activities and ensure coverage is in place and provides adequate protection. SHIBA volunteers who drive their own vehicle for SHIBA work purposes are required to carry liability coverage on any vehicle so used. The cost of this insurance is borne by the volunteer.

Automobile insurance coverage is verified at least annually by the volunteer's supervisor, signed off by the volunteer, and the signed certification is retained in the volunteer's personnel file. Volunteers immediately notify their supervisor if their automobile insurance coverage lapses.

2.4 Safety training

Volunteers are informed of foreseeable hazardous aspects, materials, equipment, or processes they may encounter while performing volunteer work and are trained and equipped in methods to deal with all identified risks.



Training for volunteers includes discussion of safe work practices and methods for responding to potentially hazardous situations. Volunteers exercise caution in all work activities. Volunteers who violate safety standards, who cause hazardous or dangerous situations, or who fail to report such situations are subject to disciplinary action, up to and including dismissal.

2.5 Reporting of abuse

SHIBA volunteers who witness instances of physical, psychological, financial or verbal abuse of consumers while performing their assigned duties report this to their supervisor so that appropriate follow-up action may occur. SHIBA volunteers are not allowed to visit client homes.

2.6 Privacy and location of counseling

Face-to-face work with individual clients primarily takes place at Sponsor location. Where clients are unable to travel to the SHIBA or Sponsor's office, volunteers discuss with their supervisor alternate meeting arrangements that will maintain beneficiary privacy. Off-site counseling work is not undertaken by volunteers without prior approval. Where one-to-one information is requested by an audience member at a public presentation, SHIBA volunteers provide only general information and do not gather personal, financial, or other confidential information from the beneficiary. Inquiries that involve the collection of such personal, financial or other confidential information are referred for a more formal counseling session in an appropriately private location.

2.7 Home visits

We take the safety and reputation of our volunteers very seriously. Our volunteers do not perform home visits or counsel clients in their own homes. At no time should you ever go into the home of a client or have a client in your home, even if you are accompanied by another volunteer or a paid staff member who is authorized to make the visit. As a volunteer, you are not protected by the OIC in this activity. We recommend you provide the service over the phone or in a public location to ensure the safety and well-being of all.



When a request comes in to the sponsoring organization for a home visit, your volunteer coordinator or the person who received the request will decide the best plan of action for the client. They will base their decision upon resources available in the community, such as paid senior information and assistance staff, a Department of Social and Health Services case manager, paid Aging and Long Term Care staff, etc.

2.8 Incident reporting

Any accident or injury to or by a volunteer is reported immediately to the supervisor. An incident reporting form and protocol exists. Volunteers complete required accident and injury reports promptly following any incident.

2.9 Incident response

In response to a reported incident involving SHIBA volunteers, the Volunteer Coordinator ensures/oversees the notification of relevant authorities (e.g., SHIBA management, police, public health, insurance, ACL, etc.) as appropriate and undertakes subsequent steps necessary to respond to and resolve the incident.

2.10 Emergency contact procedures

SHIBA and Sponsor locations have emergency contact information on all of its volunteers — even short-term volunteers — and a procedure that enables volunteers to communicate with SHIBA or the Sponsor Location's supervisory personnel at any time volunteers are on duty. Response to emergency communications takes place without delay.

2.11 Disaster plan

Not in use by SHIBA

The SMP/SHIP has a plan for dealing with natural disasters, including flood, tornado, earthquake, and pandemic. This plan includes a communication plan for alerting volunteers who might be engaged in performing SMP/SHIP work in affected communities.



Section 3.0: Volunteer program management

3.1 Fair and equitable application

SHIBA policies guiding volunteer program management apply equally to all SHIBA volunteers, and compliance with these policies is a condition of continued volunteer involvement with SHIBA.

3.2 Community representativeness

SHIBA strives to develop a volunteer population that mirrors the diversity of the community in which it operates.

3.3 Beneficiaries and relatives as volunteers

Not in use by SHIBA

Relatives of beneficiaries may serve as SMP/SHIP volunteers, but are not placed in a position of direct service or relationship to members of their family who are receiving services.

3.4 Service at the discretion of the SMP/SHIP

SHIBA accepts the service of volunteers with the understanding that such service is at the sole discretion of SHIBA. Volunteers agree that SHIBA may at any time decide to terminate the volunteer's relationship with SHIBA or to make changes in the nature of their volunteer assignment. A volunteer may at any time, for any reason, decide to sever her or his volunteer tenure with SHIBA.

3.5 Volunteer rights and responsibilities

Volunteers are viewed as a valuable resource to SHIBA, its staff, and its clients. Volunteers have the right to be given meaningful assignments, the right to be treated as equal co-workers, the right to effective supervision, the right to be informed about significant matters affecting their roles and the right to recognition for work done. In return, volunteers agree to actively perform their duties to the best of their abilities, comply with these Volunteer Polices and other work-related direction and provisions, and remain loyal to the values, goals and procedures of SHIBA.



3.6 Volunteer program management system

SHIBA ensures that an infrastructure is in place to support volunteer involvement and volunteer program management that, together, create effective, productive, safe, and rewarding volunteer involvement.

3.7 Coordinator of volunteers

SHIBA has at least one staff person with designated responsibility for coordinating and managing the involvement of volunteers. As required by program or budgetary limitations, this role may be shared among staff.

3.8 Resources for volunteer support and involvement

An annual budget for the volunteer management unit is formulated with input from the Volunteer Coordinators.

3.9 Maintenance of records

A system of records is maintained on each volunteer, including, but not necessarily limited to:

- Application and related information gathered in the screening process
- Dates of service
- Positions held
- Training and orientation received
- Duties performed and achievements attained
- Performance records including appropriate documentation of any performance issues
- Record of exit
- Current contact information

Volunteer records maintenance

SHIBA staff maintain records on each SHIBA volunteer that has been activated in STARS as a resource. Volunteer files include:

- Volunteer application, including Background Authorization
- Background Check
- STARS Resource Record



- Volunteer agreement
- Mentoring checklist
- SHIBA volunteer certificate
- Any corrective action plans or other correspondence

3.10 Volunteer access to personnel record

Upon reasonable notice, volunteers may examine the contents of their own personnel file located in Tumwater.

3.11 Evaluation of the volunteer involvement and the volunteer program management system

The coordinator of volunteers conducts regular evaluations of both volunteer involvement and the infrastructure in place to support volunteer involvement in SHIBA.

3.12 Volunteer role development

Volunteers may fill a wide range of standard roles at SHIBA. All roles must conform to the primary goals of the SHIBA program. SHIBA staff are encouraged to identify possible new roles for SHIBA volunteers. Volunteers may be invited to serve at a range of levels of skill and decision-making.

3.13 Volunteer-staff interface

Volunteer resources do not displace paid staff. The availability of volunteer resources is never a factor in the consideration of staff layoffs, terminations or loss through attrition. Volunteers supplement but do not supplant the work of paid staff.

3.14 Role descriptions

Prior to any recruitment effort or volunteer assignment, a role description is developed for each volunteer position. All role descriptions include, but may not be limited to the following:

- Purpose of the role
- Role duties
- Designated supervisor



- Worksite location(s)
- Time frame for the performance of the work along with work schedule
- Qualifications
- Benefits of the role to volunteers

SHIBA's developing a new and revised policy.

3.15 Standards of performance

Standards of performance are established for each volunteer role. A copy of the relevant standards of performance is provided to all volunteers at the beginning of their assignment. Expectations of volunteers should be provided at the beginning of their assignment.

3.16 Refusal of assignments

Volunteers are expected to refuse work assignments whenever an assignment exceeds the parameters of the volunteer role description, requires the volunteer to perform a function for which they have not been trained or are not qualified, or exceeds the limits of their individual capacity.

3.17 Paid staff requests for volunteers

Requests from paid staff for volunteer assistance are communicated to the coordinator of volunteers by interested staff. The coordinator of volunteer's recruits and places volunteers only in settings where staff are clearly supportive of volunteer involvement and willing to work together with, and provide support for, volunteer participation.

3.18 Worksite

A safe and appropriate worksite is established for every volunteer.

3.19 Length of service

All volunteer roles have a set term of service. Volunteer assignments end at the conclusion of their set term, without expectation or requirement of reassignment of that role to the incumbent.

Terms are under development.



3.20 Leaves of absence

At the discretion of the coordinator of volunteers, in consultation with the volunteer's immediate supervisor where appropriate, leaves of absence are granted to volunteers.

3.21 Recruitment

Volunteers are recruited by SHIBA on a pro-active basis, with the intent of broadening and extending SHIBA services to clients. Acceptance as a volunteer is not automatic. Volunteers fulfill all screening, orientation and training requirements for the role in which they are interested before being accepted into service.

3.22 Non-Discrimination

Volunteer roles are open to community members of all ages above the age of majority regardless of race, religion, color, national origin, gender, gender identity, sexual orientation, ancestry, mental or physical disability, medical condition, disability, political activity, marital status, or age. The sole qualification for volunteer assignment to a specific role is suitability to perform a task on behalf of the SHIBA.

3.23 Recruitment of minors

Not in use by SHIBA

Volunteer roles open to the engagement of minors have clearly prescribed responsibilities well suited to young persons, occur in a supervised and non-hazardous environment, and comply with all child labor laws.

3.24 Advertisement of volunteer opportunities

Opportunities to volunteer are publicized broadly and through a variety of methods to ensure that no group of people is excluded because of limited distribution of information.

3.25 Communication with prospective volunteers

Response to people who express an initial interest in volunteering with SHIBA is speedy. A response protocol exists to prevent undue delay and ensure that



prospective volunteers receive a welcoming and effective recruitment message.

3.26 Wait list

Not in use by SHIBA

If volunteer opportunities are not immediately available or initial volunteer training is not available quickly, the SMP/SHIP may maintain a wait list of interested prospective volunteers or help volunteers find other suitable volunteer work.

3.27 Selection policy

The decision to accept (or not) each volunteer applicant is based on careful consideration of all pertinent information gathered in the screening process. SHIBA strives to maintain a safe and productive workplace with honest, trustworthy, reliable and qualified volunteers who do not present a risk of harm to themselves, other persons, or the reputation of SHIBA.

The Path to SHIBA certification outlines the application and subsequent screening process. Screening processes are clear and comprehensive and standards are never waived, even for persons known to the screener. Screening inquiries are limited to collecting information directly connected to the ability of the applicant to effectively perform volunteer work for SHIBA. SHIBA applies a formal selection process to all prospective volunteers. This process varies according to the nature and degree of responsibility in the work to be done, access to money or other valuables, access to personal or confidential information, and/or access to beneficiaries or members of the public. Positions of trust are subject to significantly more rigorous screening inquiries.

3.28 Screening authority

Screening and acceptance decisions are made by authorized persons only, typically the Volunteer Coordinator and or Program Manager

3.29 Equity and human rights compliance

While screening processes vary by role, applicants for any given role are screened in the same way as all other applicants for that same role. All



screening inquiries and decisions comply with relevant human rights requirements.

3.30 Right of refusal

Acceptance as a volunteer is not automatic. SHIBA reserves the right not to accept applicants based on an objective and equitable assessment of their suitability. The SHIBA Program Manager has final authority.

3.31 Full disclosure of process and volunteer consent

Prospective volunteers are notified early in the application process about the range of screening inquiries used by SHIBA for its various volunteer roles. No screening inquiry is undertaken without the prior knowledge and permission of the applicant. Prospective volunteers agree to the right of SHIBA to conduct appropriate inquiries regarding the background and qualifications of applicants and cooperate fully in the fulfillment of these checks.

Prospective volunteers have the right to refuse permission for any line of screening inquiry in which case SHIBA reserves the right to terminate the application process and refuse acceptance as a SHIBA volunteer. Applicants are informed of a projected time line of the screening process at the time of their initial interview. They are updated if screening takes longer than expected. Prospective volunteers are informed of the outcome of their application as expeditiously as possible, preferably within one week of the decision.

3.32 Application form

A standardized application form is completed by all prospective SHIBA volunteers.

3.33 Interviews

All prospective volunteers are interviewed to ascertain their suitability for, and interest in, various roles at SHIBA.

3.34 Availability of suitable volunteer roles

In cases where the interview does not uncover a suitable placement for a prospective volunteer, or where SHIBA cannot meet his or her interests, needs



or availability, the Volunteer Coordinator recommends that the volunteer seek placement elsewhere.

3.35 Conflict of interest

No person who has a conflict of interest in connection with the work they will do at SHIBA, whether personal, philosophical, or financial may serve as a volunteer. Volunteers do not promote any personal or business interest while undertaking their SHIBA assignment. One example of persons with an inherent conflict of interest is anyone who receives compensation for enrolling beneficiaries in a specific insurance plan or plans.

3.36 Reference checks

Volunteers are required to provide at least two personal and/or professional references as part of the certification process.

3.37 Background checks

Background checks vary according to volunteer role and may include, but may not be limited to verification of: 1) identity; 2) volunteer history and experience; 3) employment history and experience; 4) education; 5) social security number.

3.38 Criminal records check

All prospective volunteers applying for any position in SHIBA are subjected to a national-level criminal record check. SHIBA has a protocol for determining which criminal violations render an applicant unsuitable for SMP/SHIP assignments. SHIBA is transitioning from state to national level for background checks.

3.39 Driver's license and record checks

Volunteers whose responsibilities for SHIBA include operation of a motor vehicle are required to have a Washington State Driver's license and automobile insurance. The volunteer coordinator is required to check for this documentation at the beginning of the volunteer term and at the three year assessment period. This requirement might also require additional verification if the volunteer seeks travel approval and reimbursement from the OIC.



3.40 Limiting conditions affecting volunteer work

Volunteers with medical conditions that affect their ability to perform their volunteer duties are to consult with the local volunteer coordinators on how best to proceed.

3.41 Probationary period

All new volunteers are placed on probation for a period of three months after their initial training is complete and they have been placed into a role. Adjustments are made wherever appropriate, including the possibility of placement into a different volunteer role that better suits the volunteer.

If it is determined by either party during the probation period that involvement in the work of SHIBA is not appropriate, termination can be immediate and without prior notice or reason provided by either party. Probationary status also applies to volunteers who have been reassigned to new roles with SHIBA.

3.42 Documenting screening

SHIBA has a screening documentation process that sets out what documentation is created, for how long it is retained, and when it is to be destroyed.

3.43 Confidentiality of screening information

The confidentiality of information collected during volunteer screening is carefully protected. It **may be shared** with SHIBA screening/hiring authorities as needed in the determination of volunteer suitability.

3.44 Incomplete or false information

Falsification of information, including material omission or misrepresentation, at any point during screening is grounds for immediate disqualification from the application process, or even immediate dismissal if the falsehood is discovered after acceptance.

3.45 New screening standards for current volunteers

All SHIBA volunteers, regardless of length of tenure, are subject to the provisions of all volunteer policies, including new policies coming into effect during an existing volunteer's tenure. Existing volunteers must meet all new



screening standards relevant to the role(s) they hold, with the exception of interviews and reference checks which do not need to be initiated or repeated with existing SHIBA volunteers.

3.46 Reconfirmation of screening

SHIBA has a policy on how often various record checks (e.g., criminal records checks, driver's records check, etc.) will be repeated.

3.47 Up-screening

Prospective volunteers are screened to the level of intensiveness dictated by the role(s) for which they apply. If a volunteer applies for transfer to another volunteer role for which the initial screening process is more intensive than for the role the volunteer has been occupying, the volunteer is subjected to the additional screening inquiries of the role being applied for. Failure to satisfactorily meet these additional screening requirements is grounds for denial of the transfer.

3.48 Screening of previous volunteers

Re-acceptance of previous SHIBA volunteers is not automatic. Re-acceptance decisions are based on past performance and the results of any updated or additional screening inquires undertaken in connection with the role for which the person is applying.

3.49 Revisions to the screening process

Screening protocol is adjusted as roles change, and/or as standards of care and due diligence recommend.

3.50 Placement

When placing a volunteer in a role, attention is paid to the interests and capabilities of the volunteer and to the requirements of the volunteer role. Placements are not made unless the requirements of the volunteer, the role requirements, and the supervising staff can be met. Volunteers are not placed in roles where paid staff are unsupportive.



3.51 Staff participation in interviewing and placement

Not in use by SHIBA

Wherever possible, paid staff who will be working with the volunteer participate in the interview and placement process. Final assignment of volunteers does not take place without the approval of the paid staff with whom the volunteer will be working.

3.52 Acceptance and appointment

Service as a volunteer with SHIBA begins only with an official, written notice of acceptance or appointment to a volunteer role. No offer of acceptance is issued on a conditional basis pending, for example, the results of screening inquiries, and volunteers do not begin any work in SHIBA until they have been formally accepted into service.

3.53 Placement check-in

Not in use by SHIBA

30-days after a volunteer's placement, a second interview with the volunteer is conducted, providing an opportunity for mutual assessment of the initial placement. At this point either the volunteer or the SMP/SHIP may request an adjustment to the role, re-assignment to a different role, or determine that the volunteer is unsuitable for a role within the SMP/SHIP.

3.54 Re-assignment

Volunteers who are at any time re-assigned to a new role receive all appropriate orientation, training and up-screening (if applicable) before they begin work.

3.55 Orientation

All volunteers receive orientation on topics that include, but are not limited to:

- The purpose and values of SHIBA
- The nature and operation of the program or activity for which they are recruited
- The purpose, duties, and requirements of the role that they are accepting



Volunteers must fulfill all mandatory orientation requirements before any work is assigned to them.

3.56 Training

Minimum initial and ongoing volunteer training requirements are established by SHIBA and involve the delivery of a volunteer training program tailored to specific volunteer roles. Volunteers must fulfill mandatory training requirements before any work is assigned.

3.57 Credit for related training

Not in use by SHIBA

At the discretion of the SMP/SHIP, credit may be given for training received from another organization that overlaps with training provided by the SMP/SHIP.

3.58 Demonstrating qualifications

Following training, volunteers are tested on their knowledge and abilities for certain SHIBA roles and must demonstrate minimum levels of comprehension and skill. For such roles, volunteers are not assigned duties until their qualification for the role is certified, using the criteria and process required by SHIBA.

3.59 On-the-job training

Volunteers receive specific on-the-job training which provides the information and skills necessary to perform their volunteer assignment. The timing and methods for delivery of such training are appropriate to the complexity and demands of the role and the capabilities of the volunteer.

3.60 Paid staff involvement in orientation and training

Not in use by SHIBA

Paid staff members with responsibility for service delivery have an active role in the design and delivery of both orientation and training of volunteers.



3.61 Volunteer involvement in orientation and training

Not in use by SHIBA

The participation of experienced volunteers is invited in the design and delivery of volunteer orientation and training.

3.62 Continuing education

At the discretion of SHIBA, update training and/or recertification training is required for some volunteer roles. Volunteers who are not able to meet required continuing education requirements for their role are respectfully removed from service in that role.

3.63 Conference attendance

Not in use by SHIBA

Volunteers are encouraged to attend conferences and meetings that are relevant to their volunteer assignments, including those run by the SMP/SHIP and by other organizations.

3.64 Components

A constructive, positive and success-oriented performance management system is in place at SHIBA.

3.65 Supervisor's role

Supervisors of volunteers follow performance management policies and procedures in their day-to-day work with volunteers. In instances where more support, understanding or direction is needed, the coordinator of volunteers works with the day-to-day supervisor to help the volunteer to achieve necessary modifications.

3.66 Notice of performance management system

Volunteers are advised of the existence of the volunteer performance management system during their initial orientation with SHIBA.



3.67 Right of supervision and support

SHIBA has both the right and the obligation to provide supervision and support, to manage the work done by volunteers and to determine the nature and extent of supervisory guidance provided to volunteers.

3.68 The nature of supervision and support

Supervision and support of SHIBA volunteers reflects the principle of positive, constructive and success-oriented guidance that underpins SHIBA volunteer performance management system.

3.69 Acceptance of supervision

Upon acceptance into service with SHIBA, volunteers agree to accept supervision and support from designated supervisory personnel.

3.70 Requirement of a supervisor

Each volunteer who is accepted to a SHIBA role has an identified supervisor who is responsible for direct supervision and support of that volunteer.

3.71 Volunteers as volunteer supervisors

Not in use by SHIBA

Experienced and qualified volunteers may be assigned volunteer supervision and support responsibilities provided that they are, themselves, under the direct supervision of a paid staff member.

3.72 Lines of communication

Volunteers receive all necessary information pertinent to the performance of their work assignments. Accordingly, volunteers are included in and have access to all appropriate information, memos, materials, meetings, and consumer records relevant to work assignments.

3.73 Evaluation of performance

Volunteers receive periodic evaluation of their work.

Process is currently under development.



3.74 **Documenting performance**

The substance and outcomes of volunteer performance evaluations are documented by the supervisor and placed in the volunteer's personnel file.

3.75 Communication with the volunteer management unit

Volunteer Coordinators will maintain regular communication with SHIBA management on the status of volunteers that the VCs are supervising. VCs are responsible for the timely submission of all necessary paperwork. The VC is informed immediately of any substantial change in the work or status of a volunteer and is consulted in advance before any corrective action is taken.

3.76 Progressive corrective action

SHIBA has a written protocol for corrective action that includes a wide range of intervention techniques which are progressive in nature. When corrective action is necessary, it is positive, constructive, and success-oriented, designed to help volunteers whose performance and/or behavior is not meeting expectations. The seriousness of corrective action is matched to the nature of the performance issue, becoming progressively more serious with either the unacceptability of the transgression or the repeated failure by the volunteer to improve the situation.

3.77 Dismissal of a volunteer

Volunteers who do not adhere to the rules, policies or procedures of SHIBA or who repeatedly fail to perform a volunteer assignment satisfactorily despite supervisory support and other corrective action interventions are subject to dismissal. SHIBA establishes grounds for dismissal of volunteers. Individual situations vary and supervisors and the coordinator of volunteers use discretion and good judgment in all decisions regarding possible volunteer dismissal.

3.78 Immediate dismissal

Some behaviors are so unacceptable that they are simply not tolerated at SHIBA. Such behaviors trigger immediate dismissal of volunteers from all SHIBA volunteer service. When there is sufficient information to indicate that the unacceptable behavior has taken place, the volunteer is immediately relieved



of his or her duties. SHIBA establishes grounds for immediate dismissal. Individual situations vary and supervisors and the coordinator of volunteers use discretion and good judgment in all decisions regarding possible volunteer dismissal.

3.79 Notice of departure of volunteer

When a volunteer departs from SHIBA, whether voluntarily or involuntarily, or is re-assigned to a new role, the Volunteer Coordinator provides written notice to necessary parties.

3.80 Reassignment of work and cessation of work relationships

When a volunteer is dismissed, the working relationship to the SHIBA program, its services, personnel and clients is irrevocably severed. Volunteers are informed that further SHIBA program- or service-related functioning along with connections with SHIBA personnel, partners and beneficiaries cease upon dismissal.

3.81 Performance management review and appeals procedures

SHIBA has a corrective action review and appeals procedure in place. Volunteers are made aware of the appeals procedure upon acceptance into volunteer service. The process is currently under development.

3.82 Grievance/complaint procedure

Volunteers with complaints or grievances with staff, other volunteers, beneficiaries or partner organizations communicate these to their supervisor. If the complaint involves the volunteer's own supervisor, the volunteer conveys the complaint to the next person in the chain of command at SHIBA, typically the coordinator of volunteers. All complaints will be treated as confidential.

3.83 Investigation of outside complaints

SHIBA investigate and resolve complaints from beneficiaries and other outside parties against volunteers.



3.84 Resignation

Volunteers may resign from their volunteer service with SHIBA at any time and for any reason. Volunteers who intend to resign should provide as much advance notice of their departure as possible along with the reason for their decision. Clients working with the volunteer should be informed in writing of the assignment of a new volunteer to their case. At the time of resignation volunteers should turn in all identification and other property or materials belonging to SHIBA to their designated supervisor.

3.85 Volunteers aging in place

Not in use by SHIBA

The commitment of SMP/SHIP volunteers occasionally leads to volunteers who attempt to continue providing service even when their capacities have diminished to a point where quality of service and safety become issues. To address this issue, each SMP/SHIP shall establish a protocol for addressing the suitability of continued volunteer service.

3.86 Exit interviews

Exit interviews, where possible, are conducted with volunteers who are leaving their roles.

3.87 Clarification of meaning

It is the volunteer's responsibility to seek clarification about policies, as needed. Not understanding a policy is not acceptable grounds for failure to comply.

3.88 Volunteer conduct

SHIBA volunteers perform their duties in an objective, timely and conscientious manner. They at all times act in a knowledgeable manner, consistent with their training and these policies.

3.89 Boundaries and ethics

SHIBA clearly communicates role boundaries to volunteers. Volunteers recognize and respect the limits of their skills and abilities, and the boundaries and limitations of their role. If a volunteer is in doubt regarding the limitations



of their role, no action is taken until direction on the matter is received from the volunteer's supervisor, the coordinator of volunteers, or another authorized SHIBA representative.

3.90 Provision of service

Volunteers provide service in a responsible and objective fashion, without regard to the background or characteristics of clients. Volunteers provide current and accurate information and seek additional assistance or information when in doubt or when specialized knowledge or expertise is required. Volunteers do not recommend or endorse specific services, providers or products to beneficiaries. Volunteers do not make plan choices or decisions for beneficiaries.

3.91 Representation of the SMP/SHIP

Volunteers are agents of SHIBA while functioning in their assigned volunteer roles. Volunteers are not spokespersons for SHIBA in any formal sense and do not represent themselves as such.

3.92 Identification

SHIBA volunteers are provided identification that establishes their affiliation with SHIBA. Volunteers carry with them their SHIBA identification while engaged in the business of the SHIBA. Volunteers use the identification only when undertaking official and authorized SHIBA duties.

3.93 Use of SMP/SHIP affiliation

Volunteers may not use their affiliation with SHIBA in connection with partisan politics, religious matters, business dealings or community issues. Volunteers do not sell, recommend, or endorse any specific insurance or medical product, agent or company, or promote religious or political beliefs, perspectives or practice.

3.94 Confidentiality

Volunteers are responsible for maintaining the confidentiality of all proprietary or privileged information to which they are exposed while serving as a



volunteer, whether this information involves a member of staff, a volunteer, a beneficiary or other person, or involves the overall business of SHIBA.

Volunteers take all steps necessary to safeguard the confidentiality of all SHIBA and client related information and to prevent personal information of clients from falling into the possession unauthorized persons. Volunteers use any information collected or obtained in their course of their SHIBA work only to assist the client or otherwise fulfill volunteer role responsibilities.

No information collected or obtained in the course of SHIBA work is disclosed other than when clearly approved by an authorized SHIBA representative. There is zero tolerance for breaches of confidentiality in connection with work at SHIBA.

3.95 Dress code

As representatives of SHIBA, volunteers, like staff, are responsible for presenting a good image to clients and to the community. Volunteers dress appropriately for the conditions and the nature of their volunteer duties, maintaining a high standard of personal appearance, hygiene, and grooming at all times.

3.96 Recording of volunteer time and activity

Volunteers accurately complete and submit required information on their volunteer activity on a timely basis. This may include timesheets, client or media contacts and other reports.

3.97 Absenteeism

Volunteers are expected to be reliable and punctual. When expecting to be absent from a scheduled duty, volunteers inform their staff supervisor as far in advance as possible so that alternate arrangements may be made. It is neither the responsibility nor the right of volunteers to find or assign an alternate person to perform their work.



3.98 Harassment

SHIBA is committed to providing a safe and respectful work environment for all personnel and clients. No one has to put up with harassment for any reason, at any time. No one has the right to harass anyone else, at the SHIBA workplace or in any situation related to SHIBA programs and services.

SHIBA treats all complaints of harassment seriously, whether they are made informally or formally. Action is taken on all complaints to ensure that they are resolved quickly, confidentially, and fairly. Corrective action will be taken with anyone who has harassed a person or group of people. All SHIBA supervisors have a responsibility to stop harassment. Everything is done to stop it as soon as it is detected, whether or not a complaint has been made. Appropriate corrective action and disciplinary measures are taken where harassment has occurred. Volunteers report to their staff supervisor immediately if they are made to feel uncomfortable on the job through any behaviors or comments of beneficiaries, staff or other volunteers.

3.99 Drugs and alcohol

SHIBA operates a work environment that is free of alcohol and drug use/abuse. This is a zero tolerance policy. Non-compliance is grounds for immediate dismissal. The possession or consumption of alcohol or illicit drugs, or the misuse of prescription or "over the counter" drugs is prohibited on SHIBA premises or work sites, or in circumstances deemed by SHIBA to present a serious risk to the interests of SHIBA in terms of volunteer, paid staff, beneficiary or public safety, service quality, or the organization's reputation.

Volunteers do not use, possess, transfer, distribute, manufacture, or sell alcohol or any illegal drug while on SHIBA property, while on duty, or while operating a vehicle on duty or while driving to or from an SHIBA worksite. Volunteers taking legal medication, whether or not prescribed by a licensed medical practitioner, that affects or impairs judgment, coordination or perception so as to adversely affect ability to perform work in a safe and productive manner, notifies their supervisor prior to engaging in SHIBA work.



3.100 Acceptance of gifts

SHIBA volunteers do not accept gifts from clients, their families, caregivers, or other representatives. Any such offerings are respectfully and tactfully declined, citing, as needed, this policy as the basis for their action.

3.101 Acceptance of honoraria

Honoraria offered to SHIBA volunteers are respectfully and tactfully declined, citing, as needed, this policy as the basis for their action. Honoraria which is given to SHIBA program may be accepted by the volunteer on behalf of SHIBA.

3.102 Reimbursement of expenses

Not in use by SHIBA

Volunteers may be eligible for reimbursement of reasonable expenses incurred while undertaking volunteer work for the SMP/SHIP. Approval is received prior to any major expenditure.

3.103 Access to SMP/SHIP property and materials

As appropriate, volunteers have access to property of SHIBA and those materials and equipment necessary to fulfill their duties. Volunteers receive training in the operation of any work-related equipment and have the same responsibilities as paid staff regarding the safe use and maintenance of SHIBA equipment and materials. SHIBA property and materials are used only when directly required for the volunteer task.

3.104 Relationships with clients

Volunteer relationships with clients have the same boundaries as those between paid staff and clients. It is appropriate to be friendly, courteous, and caring but it is not appropriate to become friends with beneficiaries, their family members or others connected to the delivery of service. Friendships with beneficiaries can lead to unclear boundaries, inappropriate expectations, the appearance of favoritism or exploitation, and conflicts of interest.

Invitations to SHIBA volunteers from beneficiaries to spend personal time together or to engage in other than SHIBA business are declined respectfully, citing, as needed, this policy as the basis for their action. Volunteers treat all



beneficiaries with courtesy and respect. Volunteers respect the personal boundaries of beneficiaries and govern their physical behaviors accordingly.

3.105 Financial transactions with clients

SHIBA volunteers do not enter into financial transactions with beneficiaries/clients, client family members or caregivers, either lending or borrowing in either direction.

3.106 Political issues

Volunteers do not engage in political activities, campaigning or lobbying during volunteer hours. While on SHIBA duty, volunteers do not:

- Publicly express their personal opinions regarding political issues
- Display or distribute political signs or materials either on their person or at work sites
- Solicit or accept contributions for political purposes during volunteer hours.

3.107 Cultural sensitivity

Volunteers are trained in the norms of identified consumer groups/cultures. Volunteers demonstrate a respect for the norms and cultures of beneficiaries with whom they work and are sensitive to consumers' beliefs, traditions and lifestyles. Because excellent communication is a key to success in most SHIBA volunteer roles, volunteers are placed according to their ability to communicate effectively with beneficiaries and participants from diverse populations.

3.108 Labor actions

When a worksite is affected by a labor dispute, the coordinator of volunteers, in consultation with the SHIBA Program Manager, determines whether it is appropriate for volunteers to continue their duties at SHIBA worksite and/or in alternate settings. Where it is determined that volunteers may continue their duties, no pressure or judgment is placed on volunteers who choose not to volunteer for the duration of the dispute. When volunteers do stay involved during a labor dispute, they undertake only their regularly assigned duties and are not asked to, or of their own initiative, perform any additional duties.



3.109 Recognition

SHIBA has a system for recognizing and rewarding the work done by volunteers, both individually and collectively.

3.110 Informal recognition

It is expected that staff and coordinators will recognize volunteers on a regular basis.

3.111 Volunteer career paths

Not in use by SHIBA

Volunteers are encouraged to develop their skills while serving with the SMP/SHIP.

3.112 Feedback on results

Whenever possible, volunteers are provided feedback on the results of their work, including data on volunteer contributions that allow SHIBA to meet its service goals.

3.113 Paid staff recognition

Not in use by SHIBA

Recognition systems reward paid staff who work effectively with volunteers, and the coordinator of volunteers consults with volunteers and paid staff supervisors to identify supervisory personnel deserving of special recognition and awards for successful efforts in support of volunteers.

3.114 Volunteer-paid staff relationships

Volunteers and paid staff are partners in implementing the mission and programs of SHIBA, with each having an equal but complementary role to play. Each partner understands and respects the needs and abilities of the other. Paid staff do not make unreasonable demands on volunteers or request that volunteers exceed the boundaries of the role description or the limits of their individual capacity.



3.115 Identifying paid staff responsibility for volunteer management in role descriptions

Not in use by SHIBA

Paid staff who have responsibility for supervising volunteers have this responsibility clearly identified in their role description, including how such responsibility is to be evaluated in their own performance assessment.

3.116 Filling paid staff roles that supervise volunteers

Not in use by SHIBA

Where a paid staff role includes responsibility for working with volunteers, previous experience in working with volunteers is a key consideration in hiring into that role.

3.117 Responsibilities of supervisors of volunteers

Not in use by SHIBA

Staff persons who supervise volunteers provide oversight similar to that provided to paid employees.

3.118 Status of supervisors

Not in use by SHIBA

Paid staff who supervise volunteers are accorded the same status and privileges as those who supervise paid employees. This includes the ability to participate in training to improve their supervisory and volunteer program management skills.

3.119 Acceptance of volunteers by staff

Not in use by SHIBA

Volunteers are not assigned to work with a paid staff person without the latter's consent.

3.120 Volunteer management training for members of staff

An orientation to working with volunteers is provided to all paid staff at SHIBA.



3.121 Volunteer involvement in staff evaluation

Not in use by SHIBA

Paid staff that work closely with or supervise volunteers have those functions assessed as part of their performance evaluation. Volunteer input is invited into this process.

3.122 Evaluation of volunteer/paid staff teams

Not in use by SHIBA

Where volunteers and paid staff work together, individuals are evaluated on their own performance as well as on their ability to develop effective working relationships with other team members.



Section 4.0: Information Technology

4.1 Information procedures

Volunteers must comply with SHIBA sponsor agency information technology policies if they use agency owned computers to conduct SHIBA business. This includes, but is not limited to:

- Maintaining and protecting sensitive and confidential data to which they have access and/or responsibility
- Securing sensitive and confidential data including but not limited to social security numbers, Medicare I.D. numbers, medical history, addresses, phone numbers, date of birth, etc.,
- Prohibiting and saving confidential data to removable media unless authorized by the sponsor volunteer coordinator. Removable media includes, but is not limited to: USB drives, CD/DVD media and external hard drives.

All communication is to be professional and appropriate and users are prohibited from using electronic communication for the solicitation of funds, political messages, harassing messages or personal use.

Electronic data may be considered property of the U.S. Health and Human Services, Administration for Community Living and/or the state of Washington and may be considered public records and disclosable under state law.

Volunteers must immediately report lost or stolen equipment or client confidential data.

When entering client, outreach or media data to the SHIBA data systems, whether using sponsor or personal computers, volunteers must be trained and certified in the appropriate data system and comply with the required policies for use and access. This includes having been trained on appropriate security and safeguarding data.



Volunteers should destroy any paper documents once the client and related information is entered in the data systems.

All volunteers that enter client, outreach and media data in SHIBA data systems, and/or maintain a Medicare Unique I.D. number, must establish a non-personal email for SHIBA business purposes.

The process is as follows:

By June 1, 2018, SHIBA will require all volunteers to create a separate email account specifically for SHIBA volunteer business use only. If you already have an email address that you use exclusively for SHIBA business (no personal emails), then you've met this requirement. You don't need to do anything.

We'll also require all **new volunteers** to create a SHIBA business-use only email account as a part of our volunteer onboarding process.

The purpose of this new requirement is to **protect the volunteer's personal email** from unwanted disclosure of his or her personal information due to a public disclosure request, along with meeting Washington state law (RCW 42.56.250).

You'll need this new email address to receive and re-set your password in SHIBA's new client database system "STARS," which will replace SHIBA Online later in 2018. You might also choose to use your SHIBA email to communicate with clients and/or send them information that will help them with their personal Medicare situation.

Note: No action is required for SHIBA volunteer coordinators, in-kind staff and state of Washington staff who already comply with this new requirement. For example, you would have an email similar to: yourname@cisc-seattle.org, BobSmithF@dshs.wa.gov or yourname@homage.org, etc.



How to set up your new SHIBA email account

- 1. Choose an email provider. There are several that are free, such as:
 - a. **Gmail (www.gmail.com):** Click on the "Create account" link in blue near the bottom of the page
 - b. Yahoo (www.yahoo.com): "Sign in" and click on "Sign up"
 - c. **Outlook (<u>www.outlook.com</u>)**: Click on the "Create account" link in the upper right-hand corner
- 2. Format your name into your SHIBA email as follows:

John Robert Doe becomes:

johndshiba@gmail.com (or @Yahoo.com, @Outlook.com, etc.) If you receive a message that the email name you chose is already in use, add your middle initial:

johnrdshiba@gmail.com

If you do not have a middle initial, use the letter "n" instead: johnndshiba@gmail.com

- 3. Using your newly created email address, send an email to shiba@oic.wa.gov.
 - a. Include your name, county, and sponsor name in the email.
 - b. If you already have an email address that you use exclusively for SHIBA business (no personal emails), send an email to shiba@oic.wa.gov indicating that this is the case.

SHIBA has in place an information management protocol that outlines procedures to control volunteer access to and use of client information and the safe operation of computers used to collect and store program and beneficiary information. The protocol also specifies appropriate and inappropriate use of SHIBA computers by volunteers.

All SHIBA volunteers:

- Are responsible for maintaining and protecting all sensitive and confidential data to which they have access and/or responsibility.
- Will complete OIC Security Awareness training during Volunteer Training
- Are responsible for securing sensitive and confidential data including but not limited to: SSN, medical history, addresses, phone numbers, etc.



- Unless otherwise authorized, SHIBA personnel are prohibited from sending confidential data outside of the State Government Network and will use encrypted protocols as required.
- Are prohibited from saving confidential data to removable media unless otherwise authorized by designated SHIBA staff. Removable media includes, but is not limited to: removable USB drives, CD/DVD media, and external hard disks.

This policy applies to all SHIBA Volunteers. Electronic communication systems, including telephones, e-mail, voice mail, faxes and Internet, are available to conduct SHIBA business in a timely and efficient manner. All communications are to be professional and appropriate and users are prohibited from using electronic communications for the solicitation of funds, political messages, harassing messages or personal use.

Furthermore, all electronic data are the property of OIC and may be considered public records.

4.2 Internet protocol

Also see Policy 4.1

SHIBA has a protocol for use of the Internet, covering e-mail use and appropriate access to web sites. SHIBA has in place a protocol and appropriate training for volunteers who use wireless devices to connect to the Internet while performing SHIBA work. SHIBA has a protocol and appropriate training for volunteers who make use of their personal computers while performing SHIBA work.

The purpose of this policy is to provide information on the legitimate and ethical use of SHIBA's electronic messaging systems (email, texting, and instant messaging) and internet access for business and personal use of state resources. This policy applies to SHIBA volunteers. Data security must be considered when deciding whether to send privileged or extremely sensitive information by email or over the internet.



- SHIBA volunteers must use only use electronic messaging systems, including email, mobile devices (e.g., texting), and Instant Messaging (e.g., Skype) communications in the performance of official state business and within the scope of their duties. SHIBA does not allow the use of state-owned equipment or service for personal use.
- Agency electronic messaging systems and the internet are not to be used for any unlawful activity, including copyright infringement, sexual harassment, discrimination based on protected class status, or any other use prohibited by law or policy.
- Email is not a secure means of communication. It is possible that someone other than the intended recipient could receive an email message.
- Messages sent or received via electronic messaging systems constitute a public record as defined by Washington state law and are subject to public disclosure.
- All SHIBA personnel are to report suspected misuse and abuses of the electronic messaging systems or the internet to their supervisor or SHIBA staff.
- Violation of this policy may result in corrective and/or disciplinary action, up to and including dismissal.

4.3 Reporting stolen or lost consumer information

All SHIBA volunteers are responsible for maintaining and protecting all sensitive and confidential information. Only persons who require the Confidential Information for SHIBA purposes are permitted access to the information. Unauthorized disclosure of confidential or privileged information provides for disciplinary action, up to and including termination of employment, for the unauthorized release of confidential or privileged information. If information, files, or data is misplaced, lost, or stolen, SHIBA personnel and volunteers must immediately notify their SHIBA supervisor so that appropriate notification can be made to affected beneficiaries and authorities, and future safeguards are instituted as appropriate.



4.4 SMP/SHIP reporting software use

Also see Policy 4.1

This policy applies to all SHIBA personnel and establishes standards for software installed on SHIBA devices (desktops, laptops, tablets, phones).

- SHIBA volunteers are prohibited from installing software on SHIBA or OIC devices except as authorized by their supervisor.
- SHBIA volunteers are prohibited at all time from playing computer games or using any other non-work related software on SHIBA devices.

All of the information security policies related to SHIBA general computer and internet use also apply to SMP/SHIP national data reporting software use.

4.5 Use of social media by volunteers

Social media should be used responsibly by SHIBA volunteers.

The OIC monitors all social media platforms it owns and monitors. The OIC reserves the right to remove any comments posted on its social media accounts that contain any disallowed content listed. For any mention of OIC-related activities including SHIBA.

Volunteer's personal social media accounts:

- Volunteers have the right to establish and maintain personal social media accounts outside of volunteer work hours using personal, non-state-owned equipment and resources. Activities on these personal social media accounts will not be grounds for disciplinary action unless said activities are a conflict of interest as set forth in RCW 42.52 or are detrimental to the volunteers work performance or the program of the agency.
- Volunteers who choose to list their SHIBA affiliation on a personal social media site must not represent opinions on behalf of the agency.



Notes			







This publication may have been partially funded by grants from the Center for Medicare Medicaid Services (CMS) and the U.S. Administration for Community Living.

LOCAL HELP FOR PEOPLE WITH MEDICARE