



SQUAXIN ISLAND TRIBE

RESOLUTION NO. 04- 47

of the

SQUAXIN ISLAND TRIBAL COUNCIL

WHEREAS, the Squaxin Island Tribal Council is the Governing Body of the Squaxin Island Tribe, its members, its lands, its enterprises and its agencies by the authority of the Constitution and Bylaws of the Squaxin Island Tribe, as approved and adopted by the General Body and the Secretary of the Interior on July 8, 1965; **and**

WHEREAS, under the Constitution, Bylaws and inherent sovereignty of the Tribe, the Squaxin Island Tribal Council is charged with the duty of protecting the health, security, education and general welfare of the tribal members, and with protecting and managing the lands and treaty resources and rights of the Tribe; **and**

WHEREAS, the Squaxin Island Tribal Council has been entrusted with the creation of ordinances and resolutions in order to fulfill their duty of protecting the health, security, education, and general welfare of tribal members, and of protecting and managing the lands and treaty resources of the Tribe; **and**

WHEREAS, the Squaxin Island Department of Health and Human Services' mission is to provide for the physical, mental and spiritual well being of its community members, **and**

WHEREAS, the Squaxin Island Department of Health and Human Services has a financial and contractual mandate to provide direct and contract care services to the eligible population, **and**

WHEREAS, it is acknowledged that the funding sources to pay for such services are not of an entitlement or infinite nature and that the eligible population is currently expanding and is expected to continue to do so,

NOW THEREFORE BE IT RESOLVED, that the Squaxin Island Tribal Council mandates the Department of Health and Human Services to develop and implement policies and procedures that will define eligibility and availability of services in order to ensure the most effective use of these limited resources, **and**

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Resolution #04 - 47

BE IT FINALLY RESOLVED, that the Squaxin Island Tribal Council does hereby authorize the HHS Director to adopt and oversee implementation of the Squaxin Island Department of Health and Human Services Policies and Procedures created in June 2004 and to pass to Tribal Council for approval any future revisions of this document.

CERTIFICATION

The Squaxin Island Tribal Council does hereby certify that the foregoing Resolution was adopted at the regular meeting of the Squaxin Island Tribal Council, held on this 8th day of July 2004, at which time a quorum was present and was passed by a vote of 31 for and 0 against with 0 abstentions.



Dave Lopeman, Chairman

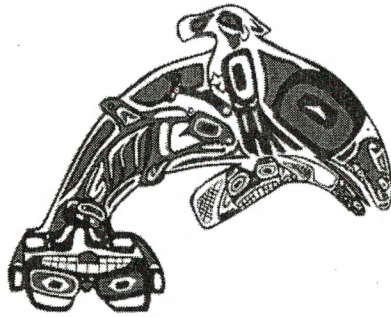
Attested by:



Vince Henry Sr., Secretary



Andy Whitener, Vice Chairman



**Squaxin Island Tribe
Department of Health and Human
Services (HHS)**

Policies and Procedures

**DEPARTMENT OF HEALTH AND HUMAN SERVICES
MISSION STATEMENT**

The mission of the Department of Health and Human Services is to provide for the physical, mental and spiritual well being of the Squaxin Island community.

1.0 DEFINITIONS:

Emergency: a threat to the loss of life and/or limb

Contract Health Services Delivery Area (CHSDA): This is the area which is used to determine patients' CHS eligibility.

Descendant: A non-enrolled child under 19 of an enrolled tribal member.

Direct Services: Medical, dental and other health services that are offered at the Squaxin Island Health Center. Direct services do NOT include laboratory services (medical or dental) or the pharmacy.

Fraud, Waste and Abuse: Fraud is any intentional deception (including attempts to produce such deception) for the purpose of depriving the Squaxin Island HHS of resources and/or securing from HHS a benefit, privilege, or consideration to which the party is not entitled.

Waste is the intentional or unintentional, thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of HHS resources to the detriment or potential detriment of the department and/or community.

Abuse is the intentional, wrongful, or improper use of HHS funds or the intentional destruction, diversion, manipulation, misapplication, maltreatment, or misuse of HHS resources.

HIPAA: Health Insurance Portability and Accountability Act; 1996 federal guidelines on the use of patient's health information

Medical Advisory Team (MAT): An advisory body for the health team within the Department of Health and Human Services consisting of 6 individual members who meet regularly to discuss policies, medical issues and cases of fraud, waste and abuse.

Native American: Any enrolled member of a federally recognized tribe.

Primary Care: Preventive health care and routine medical care that is typically provided by a doctor trained in internal medicine, pediatrics, or family practice, or by a nurse, nurse practitioner or physician's assistant. This type of care emphasizes the patient's general health needs as opposed to a specialized or fragmented approach to medical care.

Reservation: For purposes of these policies, reservation refers to the area of the original and new Squaxin Island housing complexes.

Secondary Care: Services provided by medical specialists who generally do not have first contact with patients. Consists of specialized care requiring more sophisticated and complicated diagnostic procedures and treatment than provided at the primary care level.

Tertiary Care: Specialty and sub-specialty care that often uses new technologies and therapies to treat rare conditions or unusual cases. Usually available to patients with conditions that are too complicated, too advanced or too unusual to be treated by general physicians or general acute care hospitals.

2.0 HEALTH PROGRAMS

2.1 PRIMARY CARE SERVICES

2.1.1 Hours of Service

The hours of operation for the Squaxin Island Health Center are:

Mon, Wed – Fri	8am – 12pm; 1pm – 5pm
Tues	10am – 12pm 1pm – 5pm

The health center closes for the following observed holidays: Memorial Day, July 4th, Labor Day, Thanksgiving, the Friday after Thanksgiving, Christmas Eve, Christmas Day, New Year's Eve, and New Year's Day.

It is common practice for the health center to be closed for a partial or full day for the funeral of a tribal member. Community members are encouraged to call the Health Center on these days to verify the hours of services.

There are occasional closures throughout the year for in-service training or other departmental needs. The Health Center will make every effort to alert the entire community to these closures in advance when possible.

In cases of inclement weather, the Squaxin Island Health Center follows the closure policy of the Shelton Public School System. On days when the Shelton schools close for bad weather, the Squaxin Island Health Center will be closed. Community members are encouraged to listen for local school closures in cases of inclement weather.

2.1.2 Explanation of Services:

The Squaxin Island Tribe's Squaxin Island Health Center offers quality primary care and referrals for specialty care. Squaxin Island providers follow the current acceptable community standards of care and all appropriate Washington State Administrative Codes (WACs). Primary Care services include both preventive and curative care such as well baby visits, vaccinations, emergent care, annual physicals, occupational and sports physicals, mental health counseling, clinical consultations, acupuncture and women's reproductive health care.

Referrals for specialty care are made by the Squaxin Island providers. Decisions about appropriate and acceptable specialty providers and referral care are at the sole discretion of the Squaxin Island providers.

2.1.3 Eligibility Policy

Who is eligible?

- Squaxin Island tribal members and descendants
- Other Native Americans and their descendants
- Community members including non-Native spouses, descendants, staff and those living in the Kamilche area.

Restrictions on NEW patients:

- Due to scheduling limitations, the clinic is no longer accepting any NEW non-Native patients (except in case of emergency).
- Due to scheduling limitations, the clinic is no longer accepting any NEW Native patients or their descendants that live outside of the reservation (except in case of emergency).
- The clinic will continue to accept new patients only if they are Squaxin Island tribal members, other Native Americans residing on the reservation, or Native patients referred from the Northwest Indian Treatment Center.

2.1.4 Policy for Use of Direct Care Services

Community members are required to make an appointment before receiving primary care services at the clinic. Non-urgent appointments are scheduled by the medical receptionist or front desk clerk at the clinic.

For more urgent medical issues, patients may call or walk-in to the clinic to determine availability of a provider. Same day appointments for urgent care need to be reviewed and scheduled by the nurse or medical assistant who are qualified to determine medical need and priorities.

In case of an emergency, patients should always call 911 as a first response.

In order to receive care at the Health Center, each patient must:

- Complete a patient registration form (REF)
- Provide current address information
- Provide a copy of his/her social security card
- Show proof of eligibility annually, and
- Sign acknowledgement of the HHS HIPAA policy.

A 24-hour notice is required to cancel an appointment. In the event that a patient repeatedly fails to attend scheduled appointments, the clause of fraud, waste and abuse will apply. (See section 5.0) In these cases, the Medical Advisory Team will judge the pattern of abuse and determine any necessary disciplinary actions.

Emergency room expenses resulting from broken appointments will not be covered by CHS.

2.1.5 Laboratory Services

The Squaxin Island Health Center has limited laboratory capabilities which include several simple procedures. Any lab work that is done within the health center is considered a direct care service.

Most lab tests need to be read or analyzed by an outside contracted facility. Squaxin Island receives a discounted rate from a contracted laboratory facility for most lab procedures. Although blood, urine and other samples may be collected at the Squaxin Island Health Center, they are sent out to this lab for analysis. Therefore, these procedures are NOT considered to be direct care services because they are not being performed at the health center. Patients that are non-CHS eligible will be required to pay for these services. The patient or their insurance will receive a bill from the laboratory and are responsible for timely payment. The health center will continue to pay for these services for all CHS-eligible patients.

2.2 CONTRACT HEALTH SERVICES (CHS)

2.2.1 Hours of Service

The Contract Health Services office maintains the same operating hours as the Health Center.

2.2.2 Explanation of Services:

Contract Health Services is not an entitlement program. It is designed to assist enrolled tribal members to pay for quality diagnostics, treatment and follow up care. CHS dollars are distributed for payment of medical services received outside of the Squaxin Island Health Center.

CHS funding is distributed on a first-come first-serve basis for eligible recipients. When funds are insufficient to serve all of the needs of those eligible for CHS, priorities for services shall be determined on the basis of relative medical need. Annually, the Medical Advisory Team (MAT) determines the priority level of the CHS program. This level may be re-assigned during the fiscal year if the need arises.

Medical priority levels as defined on the federal level by the Indian Health Service include:

- Priority 1: Emergent/Acutely Urgent Care Services
- Priority 2: Preventive Care Services
- Priority 3: Primary and Secondary Care Services
- Priority 4: Chronic Tertiary and Extended Care Services
- Priority 5: Excluded Services

A full definition and partial listing of the services included in each of these priority levels can be found through the Indian Health Service or at the CHS office.

2.2.3 Eligibility Policy

Currently, the federal CHSDA for Squaxin Island includes tribal members residing in Mason County ONLY. This is the population for which funding levels for the Squaxin Island Contract Health Services Program are calculated. However, the current Squaxin Island CHS Delivery Area includes tribal members living in Mason and Thurston Counties.

Who is eligible?

- Squaxin Island Tribal members living on the reservation
- Squaxin Island Tribal members living in the Squaxin Island CHS delivery area.
 - Tribal members living in Thurston County are encouraged to first contact the Nisqually CHS office.
- Enrolled Native Americans and their descendants under 19 living on the Squaxin Island reservation.
- Spouses and/or partners of Squaxin Island tribal members living in the Squaxin Island CHS delivery area for pre-natal services only
- Descendants of Squaxin Island Tribal members living in the Squaxin Island CHS delivery area. (Must show proof of eligible ancestry.)
- Community members with social and economic ties established prior to 1999.

Who is not eligible?

- Non Native persons
- Other Native Americans living off of the reservation
- Squaxin Island tribal members living out of service area.

2.2.4 Policy for Accessing CHS Dollars

General Policy

All clients must obtain a Purchase Order from the CHS office before receiving any services and/or medications outside of the Health Center. However, a purchase order is not required

for lab work that is collected and ordered by providers the Squaxin Island Health Center. (See above section 2.1.5 entitled "Laboratory Services".)

CHS requires that all clients provide the following documentation before receiving a purchase order:

1. Completed Registration and Eligibility Form (REF),
2. enrollment letter,
3. proof of address such as a utility bill, and
4. Copy of his/her social security card.

All above documentation needs to be submitted annually to keep records current.

CHS purchase orders will only be available for referrals to doctors that are on the existing provider list. No new doctors are being added to this list at this time. Information about acceptable providers can be obtained from the CHS office upon request.

Emergencies

In the case of an emergency (see definitions) in which medical care is received outside of the Health Center without prior CHS authorization, the patient must contact the CHS office within 72 hours of receiving care. The CHS office will review the patient's eligibility, compliance with notification requirements and clinical information before approving CHS payment. Payment will be approved only for those cases which abide by all CHS policies.

Because the emergency room is the most expensive way of obtaining medical care, it is important that patients use other alternatives such as urgent care facilities whenever possible.

Primary Care

All patients are required to see Squaxin Island Health Center providers first for their primary care needs. CHS will only pay an outside facility for primary medical care if:

- Squaxin Island providers are not available at the time of need.
- The patient is receiving on-going care from the outside provider.
- Rare exceptions that are approved in advance by the Medical Advisory Team.

Dental Care

CHS-eligible dental patients are required to see a Squaxin Island dental provider first to obtain a referral for any outside dental facility for care.

Chemical Dependency

The Squaxin Island Health Clinic has established a working agreement with the Northwest Indian Treatment Center and the Outpatient Facility to provide support services for those in need of Chemical Dependency Treatment. This support includes but is not limited to CHS payment for detox services at the ST. Peters Chemical Dependency Center and outpatient treatment services as well as mental health counseling and primary care services at the Health Center.

Mental Health Counseling

Patients in need of mental health counseling are required to receive care from the Squaxin Island Mental Health Counselors first. CHS will only pay for counseling at an outside facility after a referral from one of the Squaxin Island counselors.

2.3 DENTAL CARE SERVICES

2.3.1 Hours of Service



The operating hours of the Dental Office are dependent upon the schedules for the dental hygienist and the providers. Patients need to call the Health Center for clarification of hours of service.

2.3.2 Explanation of Benefits:

Squaxin Island community members may receive quality dental care through the Health Center. Available services include curative and preventive care such as routine check-ups, fluoride treatments, cleanings, sealants, periodontal therapy, fillings, crowns, root canals, extractions, bridges, dentures and partials.

2.3.3 Eligibility Policy:

Because of the limited availability of dental appointments, Squaxin Island Tribal members are seen on a priority basis in the dental clinic. Those eligible for dental services at the Health Center include, in order of priority:

- Squaxin Island tribal members and descendants
- Other Native Americans and their descendants
- Community members including non-Native spouses, descendants, staff and those living in the Kamilche area.

2.3.4 Policy for Use of Dental Care Services

Community members are required to call the Health Center for dental appointments. Due to the overwhelming need in the community, wait times will vary. CHS-eligible patients are required to see a Squaxin Island dental provider before being referred to an outside dental facility. Referrals will only be made if the required treatment is not available at the clinic.

A 24-hour notice is required to cancel an appointment. Broken appointments will not be immediately rescheduled but will be placed on a waiting list so as not to penalize others who are waiting for treatment. In the event that a patient repeatedly fails to attend scheduled appointments, the clause of fraud, waste and abuse will apply. (See section 5.0) In these cases, the Medical Advisory Team will judge the pattern of abuse and determine any necessary disciplinary actions.

Emergency room expenses resulting from broken appointments will not be reimbursed by CHS.

2.4 PHARMACY:

2.4.1 Hours of Service

The operating hours for Kamilche Pharmacy are:

Mon, Wed - Fri	8:30am - 12pm; 1pm - 5pm
Tues.	10am - 12pm 1pm - 5pm

Kamilche Pharmacy closures are consistent with those for the Health Center listed in 2.1.1.

2.4.2 Explanation of Benefits

The Kamilche Pharmacy is located in the Squaxin Island Health Clinic. Prescriptions must be requested in person or via telephone at 432-3990 or via fax at 432-3980.

Before being eligible to receive services at the pharmacy, all patients must submit proof of enrollment in a federally recognized tribe or proof of eligible ancestry (for descendants).

Most medications can be received within 24 hours. Medications must be picked up during the hours of operation or, for those living outside of Mason County prescriptions may be mailed in certain cases.

2.4.3 Pharmacy Eligibility Policy

Who is eligible?

- Native Americans enrolled in a federally recognized tribe.
- All CHS-eligible Native Americans (See CHS eligibility guidelines.)

2.4.4 Payment Policy

Payments will be elicited in the following order of priority:

- Applicable private insurances will be billed first. The pharmacy does NOT accept all insurances. Please inquire before filling your prescription.
- Squaxin Island Contract Health Services (CHS) will pay for medications and co-payments for eligible patients. (See CHS eligibility guidelines.)
- Any Native American may pay cash for prescriptions.

Patients that use CHS dollars for a prescription or co-pay are required to use the Kamilche Pharmacy. In case of an emergency, during which the pharmacy is not available, the patient may receive medications from an outside facility but must contact the CHS office within 72 hours in order to receive reimbursement.

2.5 MENTAL HEALTH PROGRAM

2.5.1 Hours of Service

The Mental Health Program operates under the same hours of service as the Health Center listed above in 2.1.1.

2.5.2 Explanation of Services

Mental Health Counselors at the Health Center are available for use by both adults and children. The counselors work in the Squaxin Island community using a variety of therapies. Patients are encouraged to establish appointments with or without a referral from their primary care provider.

2.5.3 Eligibility Policy

The eligibility policy for the mental health program is identical to that for the primary care programs listed in 2.1.3. However, there are no restrictions to new patients in the mental health program as in primary care.

2.6 MEDICAL ADVISORY TEAM (MAT)

This team consists of 6 members including HHS Director; the CHS Coordinator; the Medical Director; one member of the pharmacy team, one member of the Executive office; and one outside provider. The Medical Advisory Team is responsible for guiding HHS policies and services. The MAT also reviews all grievances against the HHS department and, in some cases, against members of its staff.

The MAT will meet at least monthly. Emergency meetings of the MAT may be organized when necessary by the Health Director or another designee of the MAT. Meeting minutes including all decisions and actions will be maintained in the HHS office.

An appeal request to a decision made by the MAT must be submitted in writing within 30 days of the decision being appealed, and must describe the decision being appealed and

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reason for the appeal. Every effort will be made to schedule an appeal meeting within 30 days of the appeal submission. The MAT will render a written decision on the appeal within 15 days of the appeal meeting.

The decision of the MAT is the final administrative action. If a person is unsatisfied with the final decision of the MAT, he/she may appeal that decision to the Tribal Court. Appeals must be submitted to the Tribal Court using the appeals notice form within 10 days of receipt of written notice of the final administrative action. The applicable law at the appeal hearing will be this Policies and Procedures manual, and any other applicable written law or policy of the Squaxin Island Tribe as they now exist or as they may be amended. The remedies available in the Tribal Court in an appeal under this section shall be limited to injunctive relief. No monetary awards shall be available. The jurisdiction of the Tribal Court in appeals of MAT final administrative actions shall be limited to upholding the decision of the MAT or reversing the MAT where the decision of the MAT is found to be arbitrary, capricious, or unsupported by substantial evidence. The decision of the Tribal Court shall be final and no further appeals shall be available.

3.0 HUMAN SERVICES PROGRAMS

3.1 Hours of Service

The Human Services Programs maintain the same hours of operation as the Health Center. However, the food bank is open on Wednesdays from 8:30am – 12pm and from 1pm – 4pm.

3.2 Explanation of Services:

Community Health Representatives

Community Health Representatives (CHRs) serve as liaisons between the health clinic and the community. The CHRs are available to provide such services as home visits, transportation for medical purposes, scheduling of appointments, transport of medications, child care assistance, energy assistance, operation of food and/or clothing banks, and emotional support services for things such as funerals and family illnesses.

Transportation services are available during HHS hours of operation to all Native Americans within the Squaxin Island community in the following circumstances:

1. There is an emergency medical need
2. Patient is an elder member of the community
3. Patient is medically unable to transport him/herself
4. Patient does not own an automobile
5. Reasonable attempts to obtain transportation from immediate family members have failed

Transportation services cannot be used for personal reasons such as shopping or transportation to school. Under no circumstances will alcohol be allowed in a CHR vehicle. For liability reasons, all clients 18 years of age and under requesting transportation must be accompanied by a parent, guardian or other responsible party. Transportation services are not available for non-Native spouses.

Requests for transport must be made with the CHR office at least 24 hours in advance. Transports over 100 miles round trip require the approval of the HHS director and must be requested with at least one week advance notice. Emergency transports do not require advance notice. (See definition of "emergency" in section 1.0.)

The food bank services are available Wednesdays between 9am – 4pm.

Energy and rental assistance are available for each client once annually.

Family Services

Family Services programs are designed to strengthen Squaxin Island families and communities. These programs are funded by federal or other grant sources. These include programs such as Indian Child Welfare (ICW), Domestic Violence, caregiver support services, Foster Care, and senior programs.

All Family Services programs operate using policies established for the program at the local or national level. These policies can be found in the HHS office.

Health Promotion/Disease Prevention

The Squaxin Island Tribe offers a variety of health promotion and disease prevention programs. These programs are designed to encourage healthy lifestyles and prevent the spread of infectious or chronic diseases. Current efforts are being made to reduce the

impact of diabetes, breast and cervical cancer, other cancers and HIV/AIDS in the Squaxin Island community.

The Diabetes Program offers on-on-one counseling with a nutritionist for individuals with or at risk for diabetes. In addition, this program offers an array of prevention activities including fitness events and nutrition education. The program follows policies established through the IHS Diabetes Program.

The Breast and Cervical Cancer Program, also called the Native Women's Wellness Program, provides breast and cervical cancer screening to income-eligible women. Education and outreach are available to increase awareness about cancer risks and the benefits of early detection. In addition, the program has a partnership with Washington State to provide treatment services for those diagnosed through the program with breast or cervical cancer. The program follows the national policies established through the Centers for Disease Control and Prevention (CDC).

3.3 Human Services Programs Eligibility Policy:

Human Services Programs are available to all Squaxin Island community members. However, enrollment requirements and criteria may vary for each program. Those interested in receiving services from one of the human services programs should contact the program coordinator at the Squaxin Island Health Center.

3.4 Child Protective Team (CPT)

The role of the Child Protective Team is to protect the health and well being of youth in the Squaxin Island community. The CPT advises the ICW program on issues of youth safety.

The CPT consists of staff from the mental health program, drug and alcohol treatment program, domestic violence, ICW program, law enforcement, department of education, and the executive office. In addition, there is a community representative on the team. Medical staff are available to provide input as needed. One member of Tribal Council is encouraged to attend CPT meetings which occur bi-monthly. Minutes from each CPT meeting are kept in the HHS office.

Policies for the functioning of the CPT can be found at the HHS office.

4.0 PHYSICAL THERAPY & FITNESS CENTER

4.1 Hours of Service

The Squaxin Island Fitness Center is open 24 hours a day, seven days a week for registered users.

4.2 Explanation of Services:

The Health Center maintains and operates a fitness facility which includes state of the art cardio-vascular and weight training equipment. In addition to a full set of free weights, the facility offers tread mills, elliptical machines, stationary bicycles and a range of nautilus equipment. The facility is located in the Health Center Lower Level.

4.3 Regulations for Use:

All registered users are required to observe the following policies:

- An orientation session is required before using The Fitness Center.
- Sign in each time you enter and leave the facility.
- Shirts and workout shoes are required. Sandals, backless shoes, and "street" shoes (anything regularly worn outside) are not allowed.
- Minimum age for participation is 16 years old or 14 years old if accompanied by an adult. Youth may use the Fitness Center only during regular clinic business hours.
- For everyone's safety and consideration, children are not allowed in or around the Fitness Center while you work out. NO exceptions!
- No food is allowed in the exercise area.
- Bring and take your fitness gear with you daily. Do NOT leave personal items behind (shoes, water bottle, etc) or they will be thrown away.
- During peak hours, time limits may be set for certain pieces or equipment. Use of the sign up board is highly recommended when the equipment is full.
- No loud or profane language allowed. Keep music to a moderate volume level.
- Any technical problems with the equipment should be reported to the clinic as soon as possible so that they may be repaired.

FAILURE TO FOLLOW ANY OF THESE POLICIES OR PRECEDURES WILL RESULT IN YOUR EVICTION FROM THE FITNESS CENTER.

There is a nominal fee for obtaining an entry card for access into the facility. This charge covers the cost of replacing key cards and machine maintenance.

4.4 Eligibility Policy:

All community members age 14 and older are encouraged to use the Fitness Center. A brief orientation and a \$10 card fee are required before using the facility.

5.0 FRAUD, WASTE AND ABUSE

All health services and expenditures will be monitored for patterns of fraud, waste, and abuse. If a pattern is noted to be developing, a "stop loss" hold may be placed on that patient's account by the Health Director until a meeting of the Medical Advisory Team can be convened. While the "stop loss" is in place, no new expenditures or services will be allowed on the patient's account. Patients will be notified in writing when a "stop loss" has been imposed upon their account.

In the event that the MAT determines that fraud, waste or abuse has occurred, the MAT may impose various control measures including, but not limited to, exclusions from specific services, medications, or providers. Fraud, waste or abuse that continues despite imposed restrictions may lead to the temporary or permanent revocation of a patient's CHS eligibility.

6.0 CONFIDENTIALITY POLICY

The Squaxin Island Department of Health and Human Services is in compliance with all federal regulations under the 1996 Health Insurance Portability and Accountability Act (HIPAA). Information regarding patient's health information is regulated using the HIPAA standards. All patients are informed of the HIPAA policies and their rights upon use of the health center. A full explanation of the act is located with the HIPAA Compliance Officer in the health center.

All HHS employees receive training in HIPAA compliance within the first 90 days of employment. Employees of HHS are also required to sign a "Confidentiality Statement" upon hire which upholds them to the strictest confidentiality standards. For any confidentiality concerns against the department or one of its members, please see the HHS Grievance Policy.

7.0 GRIEVANCE POLICY

The Department of Health and Human Services strives to continually improve on the quality and breadth of services available to the Squaxin Island community. The HHS takes seriously all grievances against the department and its staff members and vows to consider each complaint in a timely and efficient manner.

All client/patient grievances against the HHS Department must be submitted in writing to the HHS Director. Non-personnel related grievances will be reviewed by the Medical Advisory Team at the next scheduled meeting. A written response identifying the conclusions of the MAT to any grievance shall be sent within 30 days of the grievance submission.

Client/patient grievances against an HHS staff member should be directed in writing to the individual's immediate supervisor. All Grievance letters shall clearly state what action is being grieved and which policy the employee violated. The supervisor will respond in writing within 30 days regarding the repercussions of the grievance, if any. In some instances, the grievance may be reviewed as well by the Medical Advisory Team. The immediate supervisor will have the sole authority to decide if the grievance should be presented to the MAT for review. All grievances will be included in the employee's file.

If the client/patient is dissatisfied with the supervisor's decision, an appeal may be made in writing to the supervisor which clearly states the reasons for the appeal. At this time, the supervisor will convene a meeting with the community member. The supervisor may also include the MAT in this meeting if appropriate.

If the grievance remains unresolved, the community member may present a second grievance in writing to the next immediate supervisor. A written decision in response to this second grievance shall be received within 15 working days of its submission. These decisions are considered final and cannot be appealed.

8.0 RIGHTS AND RESPONSIBILITIES

8.1 Rights of the Patient

All HHS staff and providers shall ensure that each patient:

- Is treated in a manner sensitive to individual needs and which promotes dignity and self-respect.
- Has all clinical information and medical/dental files treated in a confidential manner.
- Has the opportunity, upon request, to view patient's own files.
- May ask for an exam room chaperone at any time.
- Is protected from abuse (sexual, financial, physical and mental) by staff at all times.
- Be given the opportunity to express concerns or grievances confidentially.
- Have the right to refuse any treatment and to be informed of the consequences of refusal.

8.2 Rights of the Employees

Employees of the Health and Human Services Department have the right to work in a safe environment. Patients interacting with HHS employees will treat them with respect and decorum. Loud, intimidating, abusive or profane language will not be tolerated. Patients displaying any of these behaviors on site will be asked to leave and may be escorted off the premises by tribal police. Similarly, telephone abuse will not be tolerated.

Abuse that continues despite two prior warnings may result in exclusion of the offender from direct and CHS services.

For policies that are not specified here, please refer to IHS Portland Area Policies and Procedures or those specified for each individual program.