

Volunteer Handbook

Welcome and thank you from ACL

On behalf of the U.S. Administration for Community Living (ACL), we want to welcome you to the SMP volunteer program and thank you for volunteering in the effort to empower and assist Medicare beneficiaries, their families, and caregivers to prevent, detect, and report health care fraud, errors, and abuse.

In recent years, ACL's partners in this effort—the Centers for Medicare & Medicaid Services (CMS), the HHS Office of the Inspector General, and the Department of Justice, including the FBI—have created the resources needed—including sophisticated technology and skilled local investigative and enforcement teams—to identify and prosecute criminals who steal hundreds of millions of dollars each year from Medicare and related health insurance programs. That is important work.

But in the end, we can't forget that no law or technology is as effective at preventing fraud as educated and informed consumers. Tips from Medicare beneficiaries helped take down a fraud scheme in Miami involving false claims for community mental health services. The investigation ultimately led to a judgment of \$3.8 million and a recovery of \$1.6 million against the defendants, including one who was sentenced to 3 years in prison and 3 years' probation.

Those tips likely would never have been made without the extensive outreach and educational efforts of the Florida Senior Medicare Patrol – the same outreach and educational work that you and other SMP volunteers in your state are being trained to do or to support. Preventing fraud takes a lot of time, preparation and hard work. It's people like you who bear a heavy part of that load – without always seeing the most direct or obvious rewards.

Sometimes your efforts may result in a big takedown, but more often than not, you will be preventing fraud before it ever takes place. That can be a hard thing to measure, but the benefits for Medicare and America's seniors and people with disabilities are enormous. Since 1965, Medicare has been one of our country's greatest success stories. We have a responsibility to keep it strong for generations to come. And we can't do that without you. Thank you for volunteering with the SMP.

Sincerely,

Rebecca Kinney and Josh Hodges Administration for Community Living



History of the SMP Program

In 1995, the Administration on Aging (AoA) became a partner in a government-led effort to fight fraud, errors, and abuse in the Medicare and Medicaid programs through a ground-breaking demonstration project called Operation Restore Trust (ORT). ORT's purpose was to coordinate and target federal, state, local, and private resources on those areas most plagued by abuse. Operation Restore Trust was announced at the 1995 White House Conference on Aging. The initiative focused on five states where fraud and abuse was most prevalent: California, Florida, Illinois, New York, and Texas.

ORT brought together several agencies within the federal Department of Health and Human Services, including the Health Care Financing Administration (now the Centers for Medicare & Medicaid Services or CMS), the Office of Inspector General and the Administration on Aging, to fight health care fraud, waste, and abuse. These agencies also worked with partners in law enforcement such as the federal Department of Justice and state and local authorities.

In 1996, Congress enacted the Health Insurance Portability and Accountability Act (HIPAA) of 1996 (P.L. 104-191). Although HIPAA is best known for rules that protect patient confidentiality, the law also created the Health Care Fraud and Abuse Control (HCFAC) program and authorized funding for AoA to support the effective training and mobilization of senior volunteers who provide consumer education to beneficiaries.

Another law enacted in that same session of Congress—the Omnibus Consolidated Appropriations Act of 1997 (P.L. 104-208)—affirmed AoA's role as a key partner in the fight against health care fraud by establishing the program that would come to be called the Senior Medicare Patrol program in 12 local demonstration projects. Senator Tom Harkin (D-IA) offered legislative language that directed the AoA to form projects that would recruit and train retired doctors, nurses, and other professionals to identify and report errors, fraud, and abuse.

A Senate Report explained the rationale for the newly created program by saying, "senior citizens are our best front line defense against these losses [from health care fraud and abuse], but they don't have the information and experience needed" to recognize and accurately report cases of errors, fraud, and abuse. The Senior Medicare Patrol would address this problem through volunteers who provide *consumer education* which is, along with provider education, one of the five primary purposes that the HIPAA lists as an authorized use of HCFAC funding.

As a result of this Congressional action, SMP volunteers are now at work in all fifty states, the District of Columbia, Puerto Rico, Guam, and the Virgin Islands. They teach their peers to protect themselves against fraud, safeguard Medicare numbers, and examine Medicare Summary Notices and other documents to detect discrepancies and report suspicious activity.



Allocations through the Older Americans Act and the HCFAC program help fund SMP program operations.

SMP Program Milestones

- 1995 Operation Restore Trust (ORT) brings together the Administration on Aging and other federal agencies in a coordinated effort to fight Medicare and Medicaid fraud, waste, and abuse.
- 1997 Omnibus Consolidated Appropriations Act establishes 12 demonstration projects to "utilize the skills and expertise of retired professionals in identifying and reporting error, fraud and abuse." HIPAA provides Health Care Fraud & Abuse Control program funding to AoA for consumer education.
- 1998 In the program's first year, more than 3,600 volunteers delivered 1,300 education and counseling sessions that reached 41,000 people. AoA increases the number of cooperative agreements for the program from twelve to eighteen.
- 2002 AoA convenes its first National Health Care Fraud and Abuse Control Program
 Conference in Washington, D.C. Its purpose is to share successful practices, strengthen
 collaboration between federal, state and local partners, and honor outstanding senior
 volunteers. 51 Senior Medicare Patrol (SMP) projects, located in 45 states plus the
 District of Columbia and Puerto Rico, are in operation.
- 2003 AoA convenes three regional Health Care Fraud and Abuse Control Program
 Conferences in the DC area, Dallas, and Seattle. The SMP program has projects in all fifty
 states, the District of Columbia, and Puerto Rico.
- 2004 SMP projects refer 1,700 cases to Medicare contractors for follow-up.
- 2007 SMART FACTS reporting system launches and AoA introduces a national SMP logo and outreach materials.
- 2008 Together with the National Hispanic Council on Aging, the AoA establishes the National Hispanic SMP project to focus education and outreach efforts on Spanish speaking communities in south Florida and Texas.
- 2009 eQHealth Solutions is awarded the SMP grant for the state of Louisiana.



- 2010 The Department of Health & Human Services, through the AoA, launches a
 national public awareness campaign about Senior Medicare Patrol with Fraud
 Prevention Public Service Announcements (PSAs), fact sheets, and other information
 resources. The AoA provides media toolkits, training and support to the SMPs to ensure
 effective placement and response to the PSA. Also, SMPs receive special capacity
 building grants enabling many to hire Coordinators of Volunteers.
- 2011 Working with volunteer management consultant Linda Graff and Associates, the AoA and SMP Resource Center disseminate a comprehensive set of new volunteer program management policies that will take effect in stages over three years, beginning in June 2013.
- 2011 Louisiana SMP received an award for "Most Complex Issues Referred" at the National SMP Conference in Washington, DC.
- 2012 Louisiana SMP receives the national "What's Working" award from the Aging Network's Volunteer Collaborative for innovation in volunteer recruitment.
- 2012 April 16, 2012 the Administration on Aging (AoA), the Administration on Intellectual and Developmental Disabilities (AIDD), and the HHS Office on Disability come together to become the Administration on Community Living (ACL).
- 2012 Louisiana SMP becomes one of only six programs in the country to be selected by AOA/ACL to participate in a yearlong evaluation of the SMP project.
- 2015 eQHealth Solutions is awarded the SMP grant for the states of Florida, Louisiana and Mississippi.
- 2016 eQHealth Solutions is awarded the SMP grant for the state of Wisconsin.



What is the SMP program?

What do SMPs do? The SMP program, also known as Senior Medicare Patrol program, helps Medicare and dual eligible Medicaid beneficiaries avoid, detect, and prevent health care fraud. In doing so, they help protect older persons and promote integrity in the Medicare program. Because this work often requires face-to-face contact to be most effective, SMPs have recruited nearly 4,500 volunteers nationwide to support this effort. SMP volunteers serve in many ways, including outreach, education, and one-on-one counseling. Most are Medicare beneficiaries themselves and are thus well-positioned to assist their peers.

SMP staff, including paid staff and volunteers, conduct outreach to Medicare beneficiaries in their communities through group presentations, exhibiting at community events, answering calls to the SMP help lines and meeting individually with clients. Their main goal is to teach Medicare beneficiaries how to:

- Protect their personal identity
- Identify and report errors on their health care bills, and
- Identify deceptive health care practices, such as illegal marketing, providing unnecessary or inappropriate services and charging for services that were never provided.

In some cases, SMPs do more than educate. When Medicare beneficiaries cannot act on their own behalf to address these problems, the SMPs work with family caregivers and others to address the problems, and if necessary, make referrals to outside organizations that can intervene.

How do SMPs Work? The U.S. Administration on Aging (AoA) provides funding through the Older Americans Act for the SMP projects. In 2011, the Older Americans Act grants for SMP projects totaled \$9.1 million. Also, in fiscal year 2011, the Centers for Medicare & Medicaid Services in partnership with AoA provided an additional \$9 million to the SMP projects to expand the capacity of the program and to increase outreach and education efforts in areas with high Medicare fraud rates.

SMP projects operate in all fifty states, Guam, Puerto Rico, the Virgin Islands, and the District of Columbia. A National Hispanic SMP also receives AoA funding to provide support and technical assistance to the SMP projects for outreach and education to the Hispanic communities nationwide. At the state and local levels, SMPs rely on hundreds of partnerships with host organizations that include Area Agencies on Aging, faith-based organizations, and State Health Insurance Assistance Programs (SHIPs), to help achieve the program's goals. Paid staff members at host organizations sometimes are responsible for recruiting and supervising SMP volunteers.



SMP projects receive technical assistance and training from the National Consumer Protection Technical Resource Center (the SMP Resource Center) based in Waterloo, Iowa. An additional \$3.312 million in HCFAC funds supported infrastructure and other support and capacity building activities for the SMP projects, including the SMP Resource Center.

SMP activities support the AoA's broader goals of promoting increased choice and greater independence among older adults. The activities of the SMP program also serve to enhance the financial, emotional, physical and mental well-being of older adults -- thereby increasing their capacity to maintain security and independence in retirement and to make better financial and health care choices.

The SMP programs in Florida, Louisiana and Mississippi are sponsored by eQHealth Solutions. Founded in 1986, eQHealth Solutions is a non-profit population health management and technology solutions company that touches millions of lives annually throughout the nation. Its high-tech and high-touch models include innovative technology solutions and quality care coordination services focused on high-quality outcomes and optimization of provider and payer networks. eQHealth serves a variety of entities including federal, state and commercial clients. For more information, visit www.eqhs.org



Organizational Structure

Project Director: Debra Rushing

The Project Manager is responsible for fulfilling all contractual commitments with AoA.

Program Manager: Sonja Landry

The Program Manger is responsible for establishing program efforts and initiatives that will insure the delivery of Medicare fraud related education and materials to beneficiaries statewide. The Program Manager conducts volunteer training.

Volunteer Coordinator: Sunny Lawless

The Volunteer Coordinator is responsible for managing the involvement of volunteers, insuring that the volunteer corps remains active and engaged in pertinent Medicare fraud activities.

Complex Issues Specialist: Monique Thomas

The Complex Issues Specialist is responsible for intake, investigation and referral of complaints of possible fraud, waste or abuse in the Medicare system.

Office Information

Mailing Address:

8591 United Plaza Boulevard, Suite 320 Baton Rouge, LA 70809 877-272-8720

Office Hours:

Monday - Friday 8:30a - 4:30p



Abbreviations and Acronyms

ACL: The Administration for Community Living, an operating division within the federal Department of Health and Human Services with headquarters in Washington, DC and regional offices in ten cities, includes the Administration on Aging, the Administration on Developmental Disabilities, and the Office on Disability.

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

CMS: The Centers for Medicare & Medicaid Services (CMS) administers the Medicare program and oversees state administration of the Medicaid programs. The Center for Program Integrity 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. The Center for Drug and Health Plan Choice 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.

HHS: The Department of Health & Human Services 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 on Aging (AoA), 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 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 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.

OIG: The HHS Office of Inspector General 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.

SHIIP: Senior Health Insurance Information Program provides counseling services to Medicare beneficiaries and assists them in applying for assistance programs, comparing and choosing health plans, and appealing claims denials.



SMP Volunteer Program Management Policies

A comprehensive set of program management policies guide the operation of the SMP volunteer program. The policies resulted from a project that began in 2010 to assess and identify the risks involved in the operation of the SMP volunteer program, and to provide guidance and resources to program managers to help them manage the identified risks. These Volunteer Risk and Program Management (VRPM) project policies began a two-year rollout in June 2013. The Administration on Aging (AoA) initiated the VRPM project with these factors in mind:

- Growth of the SMP programs
- Increased awareness about risks related to volunteer involvement, for example, with volunteers who have access to sensitive personal information
- The need to adapt to a changing environment for volunteering in which volunteers assume responsibility for challenging and responsible tasks
- The SMP program's higher profile in the media
- Expectations in the courts and public opinion for high standards and greater accountability in volunteer programs

The primary purpose for the VRPM project, and the development of a comprehensive set of program management policies, is to enable SMP programs to manage their volunteer programs more safely, effectively, and productively. Safety is a concern for both volunteers and the people—many of who are vulnerable seniors—who benefit from the SMP program's services. The VRPM project also promotes effectiveness by setting a high standard of care in regard to volunteer services. The creation of national standards for this important area of program operations will enhance the program's results.

As an SMP volunteer, you have an obligation to know and understand the policies and how they affect and protect you. SMP staff will refer to the policies as they manage you and the other volunteers in the program. The policies address:

- Definitions of key terms
- Volunteer role classifications and position descriptions
- Risk management and insurance requirements
- Incident reporting and response procedures



- Volunteer rights and responsibilities
- Coordinator of volunteers role
- Screening procedures
- Orientation and training
- Performance management
- Boundaries and ethics, including relationships with beneficiaries
- Confidentiality
- Grievances and complaints
- Recognition
- Information and data security, and
- Much more

This handbook contains information, below, on some of the policies that most interest volunteers such as roles, rights and responsibilities, orientation and training, screening, dismissal, and complaints and grievances. If you would like to see the complete set of SMP volunteer program management policies, it may be requested from the coordinator of volunteers.



Volunteer Qualifications

SMP offers five different volunteer roles. Descriptions of these roles are listed on subsequent pages. Following is a list of required and preferred qualifications that apply to all volunteer roles.

Required Volunteer Qualifications

- A personal email address and the ability to check email often
- Reliable transportation enabling the volunteer to travel within his/her city and/or parish
- Ability to transport and carry education and information materials to designated locations
- Good communication skills
- Ability to work and get along well with others from diverse backgrounds

The following qualifications are preferred for all volunteers however, they are not required:

Preferred Volunteer Qualifications

- Computer literacy, including familiarity with internet searches and web links
- Public speaking skills
- Active listening skills
- Ability to work independently



Orientation and Training

Orientation and training are essential to developing the knowledge and skills that SMP volunteers need to serve the people of their communities effectively. Orientation takes place shortly after the SMP accepts a volunteer into service. Its aim is to explain, among other topics, the:

- Purpose and values of the SMP
- Nature and operation of the program or activity in which the volunteer will participate
- Purpose, duties and requirements of the role the volunteer is accepting

Training Programs The SMP has established minimum training requirements and programs for the various volunteer roles. Volunteers must complete the training required for their roles and demonstrate through testing that they have attained minimum levels of comprehension and skill, before program managers give them work assignments.

The SMP Resource Center and state SMP programs make these training programs available on line at www.smpresource.org.

SMP Foundations Training: This training program provides SMP volunteers and staff with a foundation of knowledge in three main content areas including the SMP program, Medicare basics, and Medicare fraud and abuse. Both classroom and online training options are available. Participants should allow 4 to 6 hours to complete the entire online course. Volunteers completing online training will also attend a two-hour, face-to-face orientation session.

The SMP Foundations Training is mandatory for all SMP volunteers. The training below is optional, depending on the volunteer roles chosen.

SMP Group Education Training: This program provides presenters of SMP group education sessions with the necessary skills and resources to deliver the SMP message consistently and effectively to Medicare beneficiaries, caregivers and other interested groups.

SMP Counselor Training: The goal of this program is to provide SMP staff and volunteers with the necessary skills and resources to handle one-on-one counseling sessions and simple inquiries consistently and effectively.



In addition to the formal training programs for the various SMP volunteer roles, volunteers may receive on-the-job training through coaching and feedback of a supervisor or a veteran volunteer mentor. The SMP may also require attendance at periodic continuing education training programs to provide informational updates and/or additional skills training. The SMP encourages volunteers to build their skills through training while serving with the SMP.



Volunteer Roles

The SMP program operates with five standard volunteer roles. State and local programs may create additional roles to meet specific volunteer program and community needs. Information about the roles and the responsibilities connected with them are set forth in position descriptions. SMPs may create position descriptions that combine elements of the standard roles. A position, for example, may combine the "staffing exhibits" and "making group presentations" roles below into a position called "outreach volunteer." SMP program managers should give you a copy of a position description that describes the purpose, duties, and qualifications for the role(s) in which you have agreed to serve.

The five standard SMP volunteer roles are:

- <u>Staffing Exhibits:</u> This role involves staffing information kiosks or exhibits (booths) at community outreach events. Volunteers who serve in this role are limited to providing general information about the SMP and Medicare/Medicaid fraud and abuse and do not engage in discussions of personal information or situations other than to answer simple inquiries. Requests for counseling are deferred to qualified SMP counselors.
- <u>Administration:</u> Volunteers assist the SMP through administrative work but do not
 interact with the public or answer questions about specific issues or situations. Any
 requests for information that might be received by administrative volunteers are
 referred to SMP Counselors or other qualified personnel. This volunteer role includes
 office assistance, data entry and other administrative work connected to the operation
 of the SMP.
- Group Presentations: This role involves giving substantive presentations on SMP topics to audiences, and offering an opportunity for interaction with audience members.
 Group presentations include delivery of complex information and/or opportunity for Q & A with the audience. Volunteers who serve in this role are limited to providing general information regarding the SMP and Medicare/Medicaid fraud and abuse and do not engage in discussions of personal information or situations other than to answer simple inquiries. Requests for counseling are deferred to qualified SMP counselors.
- <u>Simple Inquiries/One-on-One Counseling:</u> SMP Counselor volunteers engage in direct discussion of the individual situations of beneficiaries but do not collect information from consumers regarding personal information such as finances, SSNs or medical conditions. Inquiries that would involve receipt of such personal information are referred to SMP volunteers or staff qualified to field complex issues inquiries.
 Counseling discussions may occur either in-person or via telephone and may occur in locations other than SMP offices.



• <u>Distributing information:</u> This role involves transporting and disseminating SMP (hard copy) information to sites and events. This role does not involve engaging beneficiaries in individual discussions about personal information or situations. Any beneficiary requests for information or assistance that a volunteer receives while serving in this role are deferred to volunteers or staff who are qualified to handle simple inquiries and/or provide one-on-one counseling.

The SMP considers three roles—Staffing Exhibits, Group Presentations and Simple Inquiries/One-on-One Counseling—to be "positions of trust." This means that the roles involve access to beneficiaries or other vulnerable people, personal or confidential information, or to money or other valuables. The three positions of trust are subject to more rigorous screening procedures than the roles involving administration and information distribution. If you decide to transfer from one role to another, please keep in mind that you may be required to undergo a more intensive screening process to qualify for placement in the new role.

The SMP asks volunteers to confine their activities to those tasks and responsibilities described in the position description for their specific role(s). Each volunteer role has responsibilities as well as limits to those responsibilities. A volunteer who is trained to make group presentations, for example, should not handle complex issues and referrals unless she or he formally qualified for that role after completing any required screening procedures and training.



Rights and Responsibilities

SMP program volunteers have certain rights and responsibilities that are good to keep in mind during the course of your volunteer service. Because the program's leadership sees volunteers as a valuable resource to the program and the communities it serves, volunteers have rights, for example, to meaningful work, support, and recognition for the work they do.

At the same time, the SMP program expects volunteers to perform their duties to the best of their abilities, to comply with the program's Volunteer Policies, and to remain loyal to the program's values, goals and procedures. Volunteers serve at the sole discretion of the SMP program, and agree that the SMP may decide to end a volunteer's relationship with the SMP or to change the nature of the volunteer's assignment when appropriate.

As an SMP Volunteer, you have a right to:

- Receive meaningful work assignments
- Treatment as an equal co-worker
- A safe work environment
- A respectful work environment free of harassment
- Receive orientation and training
- Receive effective supervision
- Receive constructive feedback on a regular basis
- Receive informal and formal recognition
- Receive clear information about the boundaries for the work you are to do and not to do (see the position description for your volunteer role)
- Receive all the pertinent information you need to perform your work assignments
- Refuse any tasks or work assignments, especially when the assignment requires you to do something for which you have not been trained
- Security and confidentiality for the records in your personnel file
- Examine the contents of your personnel file
- · Make complaints and file grievances
- Resign from your volunteer service at any time



- Receive reimbursement for mileage any time you travel outside of your home parish or exceed 30 miles round trip.
- To cancel if bad weather conditions, illness or other unforeseen circumstances arise on the event date that makes it difficult for you to fulfill your duties. In the event of cancellation, please let SMP staff know. See Appendix A for the Severe Weather and Disaster Safety Policy.
- Depart from any SMP activity/event the moment you feel uncomfortable. The SMP staff practices due diligence to make sure all venues are safe and free of conflicts. However, should you, at any time, feel unsafe, uncertain or uncomfortable, you should immediately leave the activity/event. Your safety is more important than the activity/event.

As an SMP Volunteer, you have a responsibility to:

- Refer any questions you cannot answer to the SMP office
- To enter the SMP Hotline Number 1-877-272-8720 into your cell phone
- Provide SMP services responsibly and objectively, without regard to the background or characteristics of the beneficiaries or clients or with favoritism to specific services, providers, or products
- Represent the SMP program only to the extent that your position description and role specifically authorize, and not to present yourself as a spokesperson for the SMP program in a formal sense
- Use your affiliation only in the interests of the SMP program, and not to promote religious or political beliefs or personal business dealings
- Inform SMP staff of any conflicts of interest that may arise after placement in your volunteer position
- Report any abuse that you may witness involving the program's beneficiaries or clients
- Report incidents such as accidents, injuries, errors, and the like to SMP staff
- Report on your volunteer activities on a timely basis
- Protect the confidentiality of the program's beneficiaries and/or clients
- Follow procedures to ensure the security of clients' electronic and hard copy data
- Report changes in your health status or medical treatment that might adversely affect your performance to SMP staff
- Notify SMP staff of absences that will prevent you from performing an assigned task
- Complete required training programs, including continuing education programs



The previous list shows many, but not all, of the rights and responsibilities for SMP program volunteers. For the specific policy language on these and other rights and responsibilities, see the *Volunteer Risk and Program Management Policies Manual*.

Here are some examples that we hope will help clarify some of these responsibilities.

Representing the SMP Volunteers who are trained to make group presentations are authorized to discuss, and answer questions about, approved SMP education programs. In that limited capacity, they are free to identify themselves as being affiliated with the SMP. They should not, however, hold themselves out as public spokespersons for the program in connection with media inquiries or questions related to official policy positions.

Reporting Conflicts of Interest One concern for SMP program managers is the appearance of an implied endorsement for a volunteer who is known to the community for his or her business and/or political interests. After discussing the circumstances with a volunteer, a program manager may decide that a person who is engaged in health care sales, or who is running for a seat on the city council, is unsuited for making SMP group presentations because of the danger of blurring the lines between the person's volunteer activity and his or her business or personal interest. Please bring any business, political or personal activity that arises that may conflict with the mission and goals of the SMP program to your program manager's attention.

Reporting Incidents If you are involved in an accident, suffer an injury, experience harassment, or witness abuse of a beneficiary while you are on duty as an SMP volunteer, you have a responsibility to report the incident to the coordinator of volunteers. Complete and submit an Incident Report (Appendix B) as soon as possible. The form is also available at www.stopmedicarefraud.org.

Relationships with beneficiaries SMP volunteers who handle complex issues or conduct oneon-one counseling should take great care in managing their relationships with beneficiaries they meet and serve through their involvement at the SMP. It is appropriate to be friendly, courteous, and caring but it is not appropriate to become friends with beneficiaries or their family members. Friendships with beneficiaries can lead to unclear boundaries, inappropriate expectations, the appearance of favoritism or exploitation, and conflicts of interest. Volunteers who identify needs of beneficiaries outside the boundaries of their own volunteer role (e.g., financial, health care, household assistance, transportation, etc.) bring these needs to the coordinator of volunteers for referral to appropriate community services.

SMP Volunteers do not enter into financial transactions with beneficiaries, their family members, or caregivers, either lending or borrowing in either direction.



Volunteers Who Drive If your volunteer position involves driving a motor vehicle on behalf of the SMP program, you have additional responsibilities to:

- Abide by traffic laws, such as speed limit, seat belt, and cell phone laws, as you carry out your volunteer duties
- Carry liability insurance on your vehicle
- Notify the coordinator of volunteers if your insurance coverage lapses
- Notify the coordinator of volunteers if your driver's license expires or receives restrictions that limit your ability to carry out your volunteer duties
- Record and report mileage for reimbursement (if applicable)

Volunteers are encouraged to consult with their own insurance agents regarding the extension of their personal insurance to include community volunteer work. It is the volunteer's own automobile insurance coverage that comes into play in the event of an accident or damage while a volunteer is driving their own car for SMP work. Volunteers are advised to notify their own automobile insurance provider about their SMP driving activities and ensure coverage is in place and provides adequate protection. See Appendix C for the Volunteer Driver Safety Guidelines.

Please note: The SMP Program requires copies of your driver's license and vehicle insurance if you will be driving as part of your SMP duties.



Insurance

SMP volunteers who drive their own vehicles for SMP business are to carry automobile liability insurance policies at their own expense. In the event of an accident or damage while a volunteer is driving her or his own vehicle for SMP work, the volunteer's own automobile insurance coverage comes into play. We encourage you to consult your own insurance agent about your SMP driving activities and to make sure that your coverage provides adequate protection.

If you accept a volunteer role that involves driving your own vehicle, a program manager will ask you to sign a certification of automobile insurance coverage that will be added to your personnel file. The coordinator of volunteers will verify that the coverage remains in effect at least annually. If your automobile insurance coverage lapses, please notify the coordinator of volunteers immediately so that she or he can adjust work assignments as needed.



Performance Management

The SMP program's success is measured in terms of outcomes related to public education about fraud, waste, and abuse in Medicare, and to assisting individual beneficiaries in identifying and reporting instances of suspected health care fraud, waste, and abuse. A key expectation in SMP volunteer program management is that program managers will provide the support volunteers need to successfully achieve the program's education and assistance goals. A constructive and success-oriented performance management system is in place to guide the SMP staff as they work to encourage productive and satisfying volunteer involvement in the SMP program.

Key Purposes for Performance Management:

- 1. To ensure a certain standard of service is maintained
- 2. To improve the job performance of volunteers and staff
- 3. To obtain the volunteer's input on what the organization could do better to support them in their role within the organization
- 4. To protect all participants

SMP Performance Management System The performance management system has three components: support, performance measurement, and corrective action. Each component includes a range of techniques that SMP staff can use to promote high performance. The guiding principle of performance management is to match the type and extent of supervisory support to the nature of a volunteer's responsibilities and capacity. It provides several avenues to demonstrate support and to acknowledge excellence. Here are some key points about the system's three components:

Support The SMP has an obligation to provide oversight and support for the program's volunteers. This means SMP staff has a responsibility to manage the work that volunteers do, and to determine the kind of guidance and support that each volunteer needs. The support that you receive as an SMP volunteer should reflect the principle of positive, constructive and success-oriented guidance that underpins the SMP volunteer performance management system. You should expect to receive feedback, consultation, information, and meaningful assignments from SMP staff.

Program & Performance Measurement Volunteers in the SMP program receive periodic accounting of their work. This is a more formal process than one finds in day-to-day feedback and provides a more detailed account of each volunteer's performance, on-the-job behavior, achievements, and areas for improvement. This process gives you and SMP staff an opportunity to exchange feedback, ideas, and suggestions. The SMP staff will also use the performance measurement process to update your personnel file, including changes in your volunteer role, contact information, and the like. She or he



will document the substance of the performance measurement and any mutually agreed upon revisions to your SMP volunteer roles and place them in your file.

Corrective Action SMP program managers may take corrective action when a volunteer's behavior is serious enough to require intervention, and when its continuation or repetition is unacceptable. The SMP corrective action process is progressive in that it is oriented toward success rather than focused on failure, and that the degree of intervention matches the nature of the performance or behavior issue, becoming more serious as the unacceptability of the behavior increases or the volunteer's inability to resolve the problem continues.

Corrective action in the SMP program includes a range of interventions that aim to help volunteers make needed improvements when their performance and/or behavior do not meet expectations. Interventions may include additional training, coaching, adjustment of volunteer duties, or reassignment to a different role. In more serious cases, interventions may involve formal disciplinary actions such as warnings, suspensions, and dismissal. If you would like to learn more about the SMP's corrective action process, ask SMP staff for the program's corrective action protocol.

Grievances and Appeals A volunteer who has a complaint about, or grievance with, staff, other volunteers, beneficiaries or partner organizations should communicate the concern to the SMP program manager. The SMP also has an appeals procedure through which a volunteer can request review of a formal corrective action decision, including dismissal.



Recognition

The SMP program greatly appreciates the many and varied contributions of its volunteers to the program's success. Program managers recognize and acknowledge volunteer service both formally and informally. Informal recognition may take the form of acknowledgement of the results of a volunteer's work, a thank you note, a birthday card, or an invitation to participate in the decision-making for a project or activity.

The SMP program strives to recognize volunteers for all types of productive service, and not simply for the number of hours they work. We encourage you to identify and nominate other volunteers who may deserve special recognition or awards.

Every other year the Administration on Aging solicits nominations for national SMP awards for volunteer excellence. Award winners receive a citation for their exemplary service and an expenses paid trip to a biennial national SMP conference. State SMP Program Coordinators are asked to submit nominations for these national awards. In 2011, Dr. Harold Ishler, a Louisiana SMP volunteer, was chosen for this national recognition.



Volunteer Separation

Resignation Volunteers may resign voluntarily from their service with the SMP program at any time. If you intend to resign, please notify the SMP staff as soon as possible.

Discipline & Dismissal The SMP accepts volunteers with the understanding that the volunteers serve at the sole discretion of the SMP. Volunteers who do not follow the rules, policies, and procedures of the SMP program, or who repeatedly fail to perform an assignment satisfactorily despite SMP staff support and appropriate interventions, are subject to disciplinary action or dismissal. Involuntary dismissal is typically a last resort, used only when other appropriate steps have been taken. Ideally, the staff will discuss with a volunteer in advance the reasons for a possible dismissal if other corrective actions do not resolve the problem within a reasonable time frame.

Possible grounds for dismissal are listed below. The list illustrates the range of reasons for dismissal and is not intended to be comprehensive. Grounds for dismissal include:

- Gross misconduct
- Serious misjudgment that may undermine trust in the volunteer or cause harm to others
- Insubordination, including failure or unwillingness to perform essential responsibilities in the volunteer's role or to accept direction from the SMP staff
- Being under the influence of alcohol or illegal drugs while on volunteer duty or representing the SMP
- Theft or other illegal acts
- Loss of a license (e.g., driver's license) required to carry out assignments
- Unauthorized use or misuse of SMP equipment or materials
- Harm, abuse or mistreatment of beneficiaries, co-workers and other persons
- Serious and repeated failure to follow SMP policies and procedures
- Inability to meet physical, cognitive or emotional standards of performance
- Repeated failure to perform assigned duties satisfactorily
- Unresolvable conflict of interest
- Serious breach of boundaries



Immediate Dismissal and Suspension Some behaviors are so unacceptable that, upon verification, they constitute grounds for immediate dismissal. If a question exists about the unacceptable behavior, the SMP will temporarily suspend the volunteer from service pending the results of an investigation.

Grounds for immediate dismissal include:

- Fraud, theft or abuse in connection with SMP volunteer service
- Serious illegal act
- Gross negligence causing bodily harm in connection with SMP volunteer service
- Breach of confidentiality
- Reporting for volunteer service under the influence of alcohol or illegal drugs
- Using violence in the workplace

Exit Interview Some SMP programs conduct exit interviews with outgoing volunteers. If your program conducts exit interviews, please participate and answer the questions candidly. Your responses will help managers identify the SMP volunteer program's strengths and weaknesses, and to make improvements where needed. We encourage your participation.



Volunteers with Disabilities

The SMP program values the service of volunteers with disabilities. Program managers strive to include volunteers with disabilities in all facets of the program to the extent that an individual's physical capacity allows, and to ensure access to all SMP program facilities. When requested, the program will make reasonable accommodation to meet the special needs of volunteers with disabilities.



Appendix A Severe Weather and Disaster Safety Policy

If an emergency, disaster, or severe weather occur while an SMP volunteer is performing volunteer work, the following, at a minimum, should be addressed:

- Seek a safe and adequately-supplied place of refuge. Seek guidance from on-site staff.
- Call for emergency assistance by dialing 911 from any phone.
- Contact your SMP Volunteer Coordinator if possible. SMP Coordinators and volunteers should share appropriate contact information with each other before starting volunteer duties, in case an emergency situation arises.

Severe or inclement weather can make travel (e.g., leaving your home, walking, driving, or taking public transit) extremely dangerous. Examples of severe weather include snow, ice, flooding, strong wind, extreme cold or hot temperatures, and other weather that could make it dangerous to go outside or to travel. Always consider your safety when deciding whether or not to stay home during severe weather. If there is any doubt, it is best to stay home. In cases where severe weather makes going outside or travel unsafe, follow these steps:

- Volunteers always have the right to decide that weather would make it unsafe to leave their homes or to travel for their volunteer work. <u>If you feel unsafe</u>, <u>please stay home</u>.
- If a volunteer needs to stay home, they should call SMP as early as possible and speak directly with the Volunteer Coordinator or someone at their office, not voicemail.
 - When severe weather is expected, plan ahead and make a decision early.
 Whenever possible, if you need to miss an event or presentation, contact SMP at least a day before to allow time for the Volunteer Coordinator to reschedule.
- If you are unable to speak directly with SMP or someone at their office to cancel your work, volunteers should:
 - Call the contact at the site where you would have volunteered to inform them that you will not be able to come and that the Coordinator will follow-up to reschedule.

Always consider your safety when deciding whether or not to stay home. <u>If there is any doubt,</u> <u>it is best to stay home.</u>



Appendix B Incident Reporting Form

Please use this form to report any incident involving an SMP volunteer, including:

- Injury to the volunteer, client, or program participant
- Accidents, including motor vehicle accidents
- Property damage, including damage to equipment
- Lost possessions, files, or equipment
- Abuse of a beneficiary or other individual
- Harassment and offensive remarks
- Error in judgment

<u>Information on the Affected Person or Organization</u>

Check one: □ Volunteer □ Client / Program □ Other (please describe)	Participant Paid Staff
Affected party's name:	
Address:	
Telephone number:	Email:
Information on the SI	MP Volunteer (if not the affected party)
Volunteer's name:	
Address:	
Telephone number:	Email:
<u>Inform</u>	ation about the Incident
Check all that apply: □ Injury □ Acciden □ Abuse □ Offensive Remark □ Ha	t □ Property Damage □ Lost Possession rassment □ Error □ Other (please describe)
Date of the incident:	Time of the incident:
Location of the incident:	



Describe what happened, how it happened, factors leading up to the incident, what was said or observed. Please give as much detail as possible. (Attach separate sheet, if necessary):
If there were witnesses, list their names/contact information (include yourself if you were the witness):
Complete the following (if applicable):
Name of physician consulted (if applicable):
Telephone number:
Name of hospital or clinic (if applicable):
Address:
Telephone number:
Was incident reported to the police? ☐ Yes ☐ No Police name and contact number (if applicable):
SMP Coordinator Information (Person Filing this Incident Report)
Agency/Organization name:
Contact person/Title:
Telephone number: Email:
Signature: Date:
For questions when using this form please contact the SMP Volunteer Coordinator 877-272-8720.
Please mail completed form to: SMP Volunteer Coordinator, 8591 United Plaza Blvd., Suite 320, Baton Rouge, LA 70809.



Appendix C Volunteer Driver Safety Guidelines

Volunteers for the SMP Program provide their own transportation to complete their duties. This may involve driving their own vehicle. The SMP encourages its volunteers to practice safe driving at all times. The following are safe driving tips to consider (these are recommendations):

- Make sure you are legally entitled to drive the vehicle you are using
- Make sure you are using a vehicle that is safe and road legal
- Always have a current and valid driver's license
- Always have current and valid vehicle insurance
- Make sure you are fit to drive at all times behind the wheel
- Do not drive when affected by alcohol, drugs or medicines
- Do not drive when affected by illness
- Do not drive when you are too tired to do so safely

Planning Ahead

It is important to plan your route before every journey. Planning in advance helps prevent unforeseen and risky circumstances, and you will be better prepared to deal with them if they do.

Give Yourself Time

Plan your journey to allow sufficient time to complete it at safe speeds and without needing to exceed speed limits. Take into account foreseeable weather and traffic conditions.

Poor Driving Conditions

Avoid driving in poor conditions and check the weather forecast before you set off, especially if there has been recent bad weather. If the reported advice is to only make essential journeys, please follow that advice and cancel your trip. (Please see the official SMP Severe Weather and Disaster Safety Policy in Appendix A for more information.)

Drugs

Do not drive if you have taken any illegal drugs. They can affect your decision-making and driving skills, as well as your physical and mental condition and behavior.

Medicines

Check with your general practitioner or pharmacist whether any over-the-counter or prescribed medicines you are taking are likely to affect your driving (for example, by causing drowsiness). If so, ask for an alternative medicine that does not cause side effects that could impair your driving, or avoid driving altogether while on medication.



Illness

Illness can also affect our ability to drive. We can often be tempted to "soldier" on, when in fact it would be safer not to drive until we are feeling better.

Fatigue

Consider whether you are likely to be drowsy or sleepy while driving. Tired drivers are more likely to crash, especially on long monotonous journeys, and in the early hours of the morning. If you are driving as a volunteer in the evening after a full day's work in your normal job, you may also be more tired. Discuss any problems with your SMP Coordinator.

Speed Limits

Make sure you know the speed limit of the roads you are using. Always stay within speed limits (including variable limits and temporary limits at roadwork sites) even if you think the limit is too low. Speed limits set the maximum speed for that road. However, please note there are some circumstances like driving around schools, driving on narrow roads, and driving when visibility is restricted just to name a few, when it is safer to drive at a speed less than the posted limit.

Distractions

Driving requires your full concentration all of the time. Trying to do something else while driving will distract you, as well as slow your reactions and increase the risk of crashing.

Mobile Phones

A substantial body of research shows that using a hand-held or hands-free mobile phone while driving is a significant distraction, and substantially increases the risk of the driver crashing.

Eating, Drinking, Smoking, Tuning the Radio

Many other things that might seem simple and innocent can be distracting when driving. Fatal crashes can, and do, occur because a driver chose to un-wrap food, take a drink or light a cigarette while driving. Safe driving needs concentration; avoid unnecessary distractions.

Safe Vehicle

Before driving any vehicle, check to see:

- Tires are undamaged (no cuts or bulges), are at the correct pressure and have enough tread depth
- If there are any signs of vehicle damage
- If oil, coolant, and window wash levels are correct
- The brakes are working
- The lights and indicators are working
- The windows are not damaged



- The wipers are working
- The mirrors are correctly positioned and not cracked or broken
- All occupants are using their seat belts and head restraints are adjusted correctly
- All loads are securely restrained

If in any doubt how to check any of the above, read your vehicle's handbook and/or ask someone to show you.

In your vehicle, keep copies of:

- The emergency procedures in your vehicle manual
- A copy of your current vehicle insurance
- A spare tire and tire replacement tools and jack
- A warm blanket
- A flash light and flares
- Small roadside cones and reflectors
- Drinking water

Please refer to page 19 of this handbook for more information about volunteers who drive.

Adapted in part from The Auto Club Group and Minnesota Safety Council 2010 Get There!: Your Guide to Traffic Safety (http://chicago.aaa.com/assets/files/MemberServices/Global/PDFs/Get-There-Your-Guide-to-Traffic-Safety.pdf?valid) and The Royal Society for the Prevention of Accidents (ROSPA.com).



Appendix D Information Technology Policy

To protect our SMP clients, we must ensure that their personal information is kept private and secure. This requires all SMP staff and volunteers to take cautious, proactive measures to do this at all times.

Handling and Reporting Sensitive Information to SMP

Volunteers should refrain from collecting and transmitting personal client information via Internet or email. This can include client information (Social Security number, Medicare number, date of birth, driver's license number, financial account numbers, etc.) or names of providers or companies that may be involved in potential fraud or abuse.

If you have sensitive information to communicate with SMP, please communicate that information in a phone call.

Any individual who believes they have experienced fraud should be referred to the SMP hotline at 877-272-8720. (We prefer beneficiaries make the call to SMP on their own behalf, but if there is a circumstance where the individual cannot easily contact SMP, volunteers may collect client names and phone numbers <u>only</u>.) The volunteer may then share the client's name and phone number with SMP staff, preferably by phone.

To protect client confidentiality, Counseling and Complex Issues and Referrals volunteers who conduct interviews with beneficiaries that involve the discussion of confidential information should have these conversations only in venues that prevent others from overhearing or viewing the information under discussion.

Using Personal Computers for Outreach

SMP volunteers are prohibited from using personal computers during outreach efforts. Presenters should always be prepared to give presentations without the use of technology. If presenters want to use PowerPoint presentations, they should utilize multimedia and technology options offered at venue sites.

