



Policy & Procedures

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COMMITMENT

CARE

COMPLIANCE

1. Forward

About Us

_____ has been serving the community with love and care for anyone who walks through our doors. We care about the people we work with in our pharmacy and in the community around us. This is a business, but it is also a family.

Purpose of the Handbook

The purpose of this handbook is to inform all employees of the policies and procedures of _____ (to be referred to as 'the company') and to establish the Company's expectations of the employees as well as to outline the Company's commitments to the employees.

This document is not intended to be all-inclusive. It is an overview of the Company and its work environment. *It is not a contract*, expressed or implied, nor does it guarantee employment of any length of time and is not intended to induce any employee to accept employment with this Company.

The Company reserves the right to revise, suspend, revoke, terminate or change any of its policies as it sees fit, in whole or in part, whether described in this handbook or elsewhere. If any discrepancy between this handbook and Company policy should arise, every effort will be made to inform all employees as soon as possible of all expectations and changes.

The owners are also referred to as employers, personnel directors, supervisors, and 'the Company' in this handbook. _____ is owner, president, and pharmacist-in-charge. _____ is owner, vice-president, secretary, director of Personnel/Human Resources, and bookkeeper.

This handbook supersedes and replaces any and all previous handbooks previously distributed.

2. Diversity

Equal Opportunity Statement

This Company is an Equal Opportunity Employer and does not unlawfully discriminate against employees or applicants for employment on the basis of an individual's race, color, religion, creed, sex, national origin, age, disability, marital status, veteran status, or any other status protected by applicable law. This policy applies to all terms, conditions, privileges, recruitment, hiring, placement, compensation, promotion, discipline, and termination.

Whenever possible, the Company makes reasonable accommodations for qualified individuals with disabilities to the extent required by law. Employees who would like to request a reasonable accommodation should contact the owners.

Non-harassment policy/Non-discrimination Statement

This company prohibits discrimination or harassment based on race, color, religion, creed, sex, national origin, age, disability, marital status, veteran status, or any other status applicable by law. Each individual has a right to work in a professional atmosphere that promotes equal employment.

Any employee who feels he or she has been harassed or discriminated against, or has witnessed or become aware of any type of discrimination or harassment, should bring the matter to the immediate attention of his or her supervisor. All allegations will be investigated immediately and appropriate action will be taken based on the outcome of the investigation. Investigations and the results will be kept as confidential as possible to the extent that is feasible.

No employee will be retaliated against for making a complaint in good faith regarding discrimination or harassment.

Federal Law, State Law, and ADA Requirements

All local, state, and federal laws are followed that pertain to patients with any handicap, disability or impairment. Because the Company rents this store space, all non-compliance pertaining to the building and its surroundings is immediately reported to the leaser, _____, to be repaired or corrected. If the Company can accommodate a patient, every possible modification will be implanted.

3. Employment

At-Will Employment

Employment with this Company is deemed to be 'At Will.' An at-will employment is defined as one that can be terminated or ended at any time, with or without reason, with or without notice, by either the employee or the employer.

Only the owners are authorized to modify the at-will nature of the employment relationship. Employees can be dismissed by the Company in two ways: terminated (based on sub-standard performance and/or due to employee's actions) or released (not due to employee's actions).

Employee Classifications

- **Full-time Employees:** Full-time employees are those that are paid a salary and are expected to work their normal hours when necessary to accomplish the work of the Company. These employees work approximately 32-40 hours a week and qualify for benefits as outlined in the Benefits section of this handbook.
- **Part-time Employees:** Part-time employees are those paid an hourly wage and expected to work their normal business hours when necessary to accomplish the work of the Company. These employees qualify for certain benefits as outlined in the Benefits section of this handbook.

Payday

Paychecks are distributed on the 15th and 30th of every month. If the payday falls on a holiday, checks will be distributed on the closest workday before the holiday. If the payday falls on a weekend, checks will be distributed on the Friday before.

Payroll is contracted through a local accounting firm. All sick days, flex days, or vacation days must be reported to the supervisor immediately after taken. Who will, in turn, report all information to the payroll specialists.

Employees are given the option of receiving a paper check, or pay being deposited into the account of the employee's choice during Direct Deposit. All Direct Deposit forms can be picked up from the Personnel Director.

If there is an error with an employee's check, the employee needs to contact the Personnel Director as soon as the error or inaccuracy is discovered.

If a check has been misplaced or stolen, it should be reported to the Personnel Director as soon as the loss has been discovered. A replacement check will be issued as soon as the original check has been reconciled with the Company's bank.

No advances on paychecks will be permitted.

Part time employees must report all hours to the Personal Director two (2) days before payroll checks go out.

The Company follows all state and federal laws regarding salaries, wages, and bonuses. Beginning January 1, _____, the Minimum Wage will be raised from \$8.50 an hour to \$9.25 an hour. Our full time employees, and many of our part time employees, already are paid salaries or wages that can be broken own to a greater hourly pay than required by law. In the event the minimum wage is higher than an employee's salary, the owners will consider a salary increase equal to or exceeding the minimum wage. The following scale is the legal minimum wage requirements each year: 2018 - \$8.50, 2019 - \$9.25, 2020 - \$10.00, 2021 - \$11.00.

Overtime and Compensatory Time will be granted as needed and within legal requirements and as approved by the Supervisor.

Disciplinary Policies

The Company reserves the right to discipline employees or terminate the employment of an employee who violates Company policy, practice or rules of conduct. This is to ensure the advancement of the Company, the safety and security of the patients and customers, and the safety and well-being of the other employees.

Poor performance and misconduct are grounds for disciplinary action – including performance plans and up to termination. (Employee disciplinary notice is including in the appendix.) The following list includes examples of actions that would be grounds for disciplinary action. This list is by no means comprehensive.

Employee actions that would be examples for grounds for disciplinary actions include (but is not an all-inclusive list):

- Engaging in discrimination or harassment
- Possessing, distributing or being under the influence of a controlled substance(s).
- Unauthorized use of Company property
- Damage, destruction or theft of Company property
- Dissemination Company information without authorization
- Falsification of records
- Lying
- Insubordination
- Failing to perform job responsibilities
- Excessive absenteeism
- Disclosing confidential information on employees, patients, and/or customers
- Illegal or violent activity
- Disregard for employee, patient, and/or customer safety and security
- Acting in a disrespectful manner toward supervisors and co-workers

Again, this list is only a broad example. It is not all-inclusive. The Company reserves the right to determine the severity and extent of the disciplinary action based on the circumstances of each case.

Any disciplinary procedures taken by the Company may take a variety of forms. This list is not meant to be a progressive discipline system. Oral warning, written warning, probation, suspension, demotion, discharge, removal, and termination are all options of possible discipline. These are in no particular



order, and any action will be discussed with the employee and documented in the employee file. The course of action will be determined by the Company at its discretion.

Separation of Employment

As the Company is an At-Will employer, both the employer and employee may choose to end the employment relationship at any time.

If an employee chooses to end the employment relationship, the Company requests that the employee provide, when possible, a two-week notice in writing. All rights and privileges of employment with the Company will terminate upon the date of resignation. The employer reserves the right to waive, or not waive, the two week notice given by the employee.

If the employer chooses to end the employment relation (non-termination), a two week notice will be given in writing and a reasonable explanation will be given when possible.

If the employer chooses to end the employment relationship through termination, employees may or may not be expected to work a final two weeks. Terminations can be immediate or a notice given by the company. Besides the employee, only the owners can make the decision to waive a two week period following termination, If a notice is given by the company, and the employee works the final two weeks, employees will be compensated for time worked as usual. If termination is required to be immediate, no further pay from the day will be issued to the employee. Employees will be paid for the time worked during the current pay period on the regular pay day. If the employee is terminated , vacation , flex, or sick days no longer apply.

Any benefits end with separation. Considering that benefits are for active employees, some benefits will not be issued after a two week notice is given. The most the company will pay after a notice is given is two weeks (ten days) pay when worked by the employee and not waived by the company. Sick, flex, or vacation days are no paid in any lump sum value upon separation from the company.

Upon separation from the company, employees will sign a resignation check list. This list verifies all company property is returned, employee's understand the terms of separation, and also understand that HIPAA policy still pertains to the individual after separation from the company.

A two week notice equals ten work days. A two week notice is not always the equivalent of a payroll period.

Final paychecks will be given upon the date checks are typically issued. Should the employee not be able to physically pick up his or her check at the company or does not participate in Direct Deposit, it will be mailed to the address on file.

Performance Reviews

The company may periodically review each employee's performance when necessary. The goal of these reviews is to encourage employees to excel in their roles with the company. Performance reviews will allow supervisors and employees to work together to determine an employee's strengths and weaknesses, as well as areas where an employee excels and areas where an employee needs improvement.

These reviews are not the sole basis of termination used by the company. Performance reviews are used to as a tool to determine pay increases, promotions, and possible termination. The reviews will be based on merit, achievement improvement, and any additional other factors, as deemed by the supervisor.

Factors may include but are not limited to:

- Quality of work
- Attitude
- Knowledge of the job
- Job skills
- Attendance
- Punctuality
- Teamwork
- Past performance reviews
- Acceptance of responsibility
- Feedback

Employees should note that a performance review does not guarantee a pay increase or promotion. Written performance evaluations may be conducted at any time to advise employees to provide performance notes. Evaluations do no alter the employee's At-Will relationship with the company.

Insubordination

Supervisors and employees should interact with mutual respect and common courtesy. Employees are expected to take instruction from supervisors and other pharmacists in authority. Failure to comply with instructions or unreasonably delaying compliance is considered insubordination.

Acts of insubordination are subject to disciplinary action, up to and including termination.

If an employee disagrees with a supervisor or pharmacist in charge, the employee should first try to mediate the situation by explaining his or her position with respect to the supervisor. If possible, a compromise should be met.

Workplace Safety

The company takes every reasonable precaution to ensure the safety of employees and the patients and customers. Safety measures are in place for the protection, both physically and legally, of all. Ultimately, it is the responsibility of each employee to ensure safety. Employees should maintain the workspace to be free of hazardous conditions. It should be orderly so patients and customers can be provide for in an efficient manner.

In the event of an accident affecting employees, patients or customers, an employee should notify a supervisor immediately. If an accident or mistake affects a patient or customer, the supervisor or supervising pharmacist should be notified immediately to rectify the situation.

Employees must be alert and aware of any potential dangers to themselves and co-workers. Take every precaution to ensure that the work environment is safe and secure. Patients, customers, and visitors



should not be behind the pharmacist counter unless authorized by the pharmacist. This is to ensure safety, meet federal requirements, and to meet HIPAA privacy laws.

A security system is used and is in operation 24 hours a day every day. The security system is monitored and maintained by _____ Alarm company.

Emergencies: Panic buttons for emergencies are located behind the pharmacy counter to call emergency respondents.

Non-emergencies: If at anytime the pharmacist instructs a tech or clerk to “Go in _____” that employee is to go the bathroom and call the non-emergency number for the local police station. The number is posted in the bathroom.

The store is equipped with several safety features including bullet resistance glass in the drive thru window, panic buttons, cameras, pepper spray in several concealed locations in the store, and the owner/pharmacist in charge carries a current state of _____ Concealed Carry permit.

4. The Workplace: Policies and Procedures, Safety, and Expectations

The company expects all employees to adhere to a generally accepted standard of professional conduct and integrity. This ensures that the work environment is safe, comfortable and productive. All employees should be respectful, courteous, and mindful of one another's feelings and needs. General cooperation between employees and supervisors is expected at all times. Some policies and procedures require yearly training and attestation. Those expectations are reviewed yearly and reported to all governing agencies and documented for inspection. This is a general summary of policies and procedures.

Employee Code of Conduct

Employees are expected to conduct themselves in a professional manner at all times. As required by law, the pharmacy's compliance governance is based on its employee's conduct. According to law, all pharmacies must adhere to a Zero Tolerance Policy regarding misconduct. All employees will abide by local, state, and federal laws governing pharmacies and small businesses. Laws governing employees will be addressed regularly, training will be conducted, and reference material will be made available to employees for access per local, state, and federal guidelines. Individuals who violate these basic expectations and act in an unprofessional manner may be subject to disciplinary action. As required by federal law, all employees will sign a general code of conduct agreement yearly. All information will be reported to _____ and _____ State of Board of Pharmacy by the company.

Customer Privacy & Confidentiality

WHEN IN DOUBT, DO NOT SAY IT!

It is of utmost importance that patients and customers are confident that their personal information is being treated with respect and is being guarded. No employee will disclose or distribute information regarding patients or customers as covered by the Healthcare Insurance Portability and Accountability Act (HIPAA) policy. HIPAA policy still applies after leaving the employment of the company. Never divulge patient information without the patients' consent and approval. All HIPAA training information must be reported to _____ and _____ State of Board of Pharmacy by the company.

Conflict of Interest

Employees will attest to having no controlling interest in, controlling ownership of, or will in no way advance one drug, manufacturer, insurance company, or healthcare entity over another for personal financial gain. No employee shall make doctor recommendations or counsel patients or customers unless supervised by an attending pharmacist. All information will be reported to _____ and the _____ State Board of Pharmacy by the company.

Fraud Waste and Abuse

Employees shall in no work to defraud the federal or state government health care plans. Employees will further report any types of fraud, waste, or abuse as outlined under federal law. Employees will sign documentation stating they understand and abide by this policy. All forms will be kept on file, reported to _____ and the _____ State Board of Pharmacy, and provided as evidence upon yearly inspection.

Cultural Competency

Employees are expected to act in a professional manner regarding all patients, customers, fellow employees, and any other individuals encountered as part of their position at _____. Our store values diversity. We strive to find commonalities among groups, while still respecting differences. In finding commonalities, we avoid insensitive actions, communicate clear and effectively with all customers, and relate to each customer on a personal level. It is important that each of our employees understands how a patient's diversity may impact their healthcare. We strive to provide quality care to all our patients and expect our employees to do the same. As required by federal law, all employees will sign off that they have been trained in Cultural Competency each year. All training information will be reported _____ and the _____ State Board of Pharmacy by the company. All employees must sign off that they have been trained in this area.

Combat Methamphetamine Training

Based on _____ Law Combat Methamphetamine training is conducted. All employees must know the rules of dispensing this drug including, requirements for providing proper identification by patients, the quantity allowed to be dispensed, and what constitutes a professional relationship.

Continuing Education and Employee Training

From time to time, employee training will be provided. This training is to ensure all employees perform at their highest level. Training may include, but is not limited to, topics such as technology, patient care, federal law, and proper customer service.

Abuse and Neglect Reporting

All employees are responsible for reporting all allegations of abuse and neglect within an appropriate time frame and in a thorough and appropriate manner. This includes pharmacists, employees, and volunteers as set forth in this policy. All HIPAA guidelines will be followed when reporting. If pharmacy personnel are witnesses to, told of, or has reason to believe abuse and/or neglect has occurred, a report should be made to a supervisor. The supervisor will review the information and determine if the pharmacy has a requirement to report. If appropriate, the supervisor will report the incident to the proper authorities.

USP 800 Policy

At this time, the _____ State Board of Pharmacy has not officially adopted any position on USP 800 standards; however, knowing that OSHA/NIOSH can call for an inspection and enforce USP 800, our store has adopted policies regarding the safe handling of hazardous medications, cleaning policies, and



other USP 800 guidelines. As with other policies and procedures, employees will be properly trained, training documented, and reported as needed to various agencies and governing bodies as needed.

USP 800 store policy includes the identification of any hazardous drugs dispensed, requirements for handling these hazardous drugs, cleaning surfaces that come in contact with these hazardous drugs, and procedures if improper contact occurs. We are not a compounding pharmacy and much of USP 800 does not apply to our store at this time.

While USP 800 is not officially recognized by the state, minimal cleanliness standards apply. Our pharmacy shall, at all times, maintain clean and sanitary facilities. Any incident and unsanitary practice or condition will be addressed immediately. Proper personal hygiene is expected at all times. Daily cleaning tasks are required.

Patient Allergy Policy and Procedure

Patient safety is of the utmost importance. The pharmacy keeps accurate and current records regarding patient allergies and adverse reactions. Each new patient is asked about any known allergies and adverse reactions. These are documented in the computer. When transfers are requested from other pharmacies, allergies are also requested. Periodically, patient records are updated to maintain accuracy. All emergency situations requiring immediate attention are directed to the clinic next door or an ambulance is called. If an emergency situation arises after hours, the store answering machine directs patients to call 911 for quickest response.

Private Patient Consultation Policy and Procedure

All patients are offered counseling to answer any questions and provide information necessary to properly take their prescribed medications. The store is equipped with a designation counseling area to provide patients with necessary privacy if needed. All new prescriptions are also accompanied with a computer printout of important information regarding the new medication. Patients can accept or decline counseling as they wish.

Prescription Monitoring Program Policy and Procedure

As listed in the Safety Redundancy Policy and Procedure, our store has multiple steps in place make sure medications are properly dispensed. All C2 medications are run through the Prescription Monitoring Program to insure medications are dispensed property and legally.

Usual and Customary Pricing Policy and Procedure

Prescription prices for patients are based upon AWP (Average Wholesale Price). As required by governing agencies, this must be written policy and accessible to all governing agencies upon inspection.

Safety Redundancy Policy and Procedure

Policies and procedures for handling medications is extensive and carefully monitored at all times as required by law. The following is only an overview of minimal compliance with the law. Our store will follow all laws, and even goes above and beyond, to safely handle all medications.

With the intent to have multiple checks and balances in place for patient safety, a redundancy plan is used. All medications are checked multiple times to ensure mistakes are no made that can/may endanger a patient. Beginning with _____ computer system, allergies, reactions, over-fills, and interactions are flagged immediately when prescriptions are entered into the computer system. This includes both refills and new prescriptions. The state's PMP (Prescription Monitoring Program) is also used to deter illegal prescription fills. Technicians fill all medications using an Eye-con Pill Counter which accurately counts, records, and verifies each prescriptions as correct. Technicians then take all filled prescriptions, and the pharmacy bottle each came from, to the pharmacist to a visual inspection of the medication and label. After the prescription is given to the clerk to bag, the clerk verifies that the patients' medications are bagged and labeled properly with the patient's name, scanned into the computer system, and placed in the will-call. When the medication is picked up by the patient, the Sales Clerk again matches the patient with the correct name before sales are rung up. The cash register is also connected to the _____ Rx computer system and will flag the sale as incorrect if multiple customers are rung up as one patient. With each of these steps in place, there is a constant checking of clerks, pharmacists, and technicians by each other for accuracy to ensure patient safety.

C2 Policy and Procedure

Besides the normal redundancy plan put in place for all prescription fills, C2 fills are double counted by technicians on the Eye-con Pill Counter. The pill counter takes a photo of the prescription filled for further documentation of correct count and medication dispensed. C2 medications are kept in a locked cabinet. The location of the C2 cabinet is beside the pharmacist and directly in the line of sight of all technicians, pharmacists, and employees. The _____ PMP (Prescription Monitoring Program) is used when all C2 prescriptions are filled. All controlled medications ordered are immediately checked in and shelved by a pharmacy technician and in the line of site of the pharmacist and other technicians and employees. Invoices from the wholesale house are kept and stapled with the correct DEA E222 paperwork as required by law. All blank DEA E222 forms are kept in the safe and DEA E222 paperwork and invoices are kept in the office area available for immediate inspection. The pharmacist signs off on all C2 invoices when checked in upon delivery, as well.

Patient Counseling

A private patient counseling area is offered to patients. Every patient is offered counseling. No clerk or pharmacy technician may counsel any patient at any time. The store and its employees receive no kickbacks or compensation for promoting any drug, company, insurance, medical professional, etc. and do no promote one over another.

Separation of Employment Policy and Procedure

Whether resigning, terminated, or released, employees should follow the procedures lined out in the store handbook. All employees, regardless of reason for leaving the company, must complete a Resignation Checklist to ensure complete and final separation from the Company and adherence to all applicable laws.

Refrigerated Medication Policy

All medication requiring refrigeration is transported in a secure climate controlled delivery vehicle. Immediately upon delivery from the wholesaler, a qualified pharmacy technician signs for the medication delivered. Pharmacy technicians check in the medication order and compare the shipment with the invoices. All medications requiring refrigeration are immediately stored in a cooled unit at acceptable required temperatures until dispensed. After medications are filled and checked, refrigerated medications are put back into the refrigerator in a designated bin for pick up. These medications will remain there until the patient picks them up. A blue refrigerator note will be placed in the patient's bag in will call to remind techs and clerks to get the medications from the refrigerator.

Workflow Policy and Procedure

Our store work space is small. It is important to not impede workflow. Employees should be aware of how their actions, or inaction, can greatly slow down the efficiency of the store and be well-versed in workflow procedures explained in training.

Telephones are for business use only. The company requests that employees not receive personal calls while on duty. If an urgent call is received, please keep the call short. Additional calls may be made during an employee's meal break.

Personal cell phone use is prohibited while working due to HIPAA requirements. No texting, emailing, social media use or photos are allowed. This is to ensure patient and customer privacy. No photos will be taken of patient information, medications in the company's possession, or other vital private information used to conduct daily business. No information regarding medications, patients, inventory, or policy and procedure will be posted on social media.

No information regarding the company's proprietary information, volume of business, and business associates shall be made public by an employee.

Attendance and Tardiness

The general working hours of the Company are _____ through _____. Monday through Friday and _____ on Saturdays. Each employee's hours will vary, depending upon his or her job responsibilities. The supervisors will provide employees with work schedules. The company cannot tolerate absenteeism, Employees who will be absent and are aware of the need for time off should follow the proper procedures for being off work. When flex, sick, or vacation days employees should give as much notice as possible to the supervisors. Otherwise, employees must find another employee to cover their time off. Only after both avenues have been exhausted should be a supervisor be required to find coverage for the absent employee. Chronic absenteeism may result in loss of pay or dismissal at the discretion of the employer.

Employees are expected to arrive on time and ready to work by no later than 8:30 (M-F) and 9:00 (Sat.). Employees are also expected to return from meal breaks on time. An employee who arrives after a scheduled arrival time is considered tardy. The company understands that situations will sometimes arise that will hinder punctuality, however, excessive tardiness is prohibited and may be subject to disciplinary action.



Dress Code

An employee's personal hygiene and appearance are a reflection on the company. Employees must dress appropriately for their individual work responsibilities and position. Business casual is typically appropriate for most positions within the company. All employees are required to wear closed-toed shoes as part of federal requirements.

The company periodically provides scrubs and other store logo items to employees. If employees would like to have items monogrammed with the store logo, Ship will provide monogramming at the store's expense.

Breaks

Meal breaks are 60 minutes long, and scheduling must be coordinated with a supervisor to ensure that there is ample coverage of the front of the shop.

5. Forms

Blank forms

All forms mentioned in this handbook, can be accessed at any time. Copies of forms signed by the employees will be kept in the employees' individual file. Any other forms can be accessed by simply requesting one from the bookkeeper and many are included with this handbook. An employee resource packet is also available at all times to any employee.

Personnel Files

Any employee may access their personnel file at any time. Personnel files are kept confidential unless required by law to present evidence, the information is needed for payroll, or information is used by the company providing store retirement fund.