



In this Issue...

- *Upcoming Pharmaceutical Webinar*
- *Are you a business associate? p.2*
- *CLIA, OSHA, CFR...p.3*
- *Did you miss the free webinars? p. 4*

Join our April live webinar on April 21st with Advisory Board member, Paul Baldwin, who will update us about the legislation changes that could affect the pharmaceutical industry. If you service pharmaceuticals, you'll want to stay apprised! Just in case you missed what this was all about, go to our Member Services page and click on "Insights & Resources." Paul's presentation from the 2014 Summit can be found there. If you missed the February HIPAA webinar with Keith Carrington, you'll also find the link to replay that as well!

A note from the Editor

I hate April 15th for obvious reasons so today when a colleague mentioned that he was going to drop his paper return off at the post office, I had a flash back to years gone by when I would drive to the post office after the kids and Ken was asleep to drop off our return before midnight and had to wait in line! My how times have changed!

Just 2-weeks ago, we heard from Amber Hilt who spoke at our 2014 Summit. She was the Transportation Manager for Abaxis AVRL Veterinary Labs. Sadly, due to the [sale and acquisition](#) of that lab by Antech Diagnostics, more than 100 people from the Kansas AVRL lab lost their jobs. It just proves that good planning for "life happens" events is vital to our success! (You'll be happy to hear that Amber has already been hired as the Logistics Manager for Gift Card Impressions, LLC...but talk about a transition!)

If you service Coordinated Health (CH), one of the leading acute-care hospital networks in eastern Pennsylvania and western New Jersey, you'll be happy to hear that on April 13th they expanded their regional footprint and deepened their expertise with the acquisition of Orthopedics Associates of the Greater Lehigh Valley (OAGLV). Founded in 1988, with offices in Nazareth, Pa., and Phillipsburg, N.J., OAGLV is one of the region's leading orthopedic groups.

Every day can bring blessings and challenges – both in business and personally. Our desire is to give our members tools and resources to help you make decisions that will protect your business. Have suggestions? [Email me!](#)

Planning on joining us but haven't registered yet?

We have an *incredible* line up planned and if you register by April 30th you will be eligible to win a \$350.00 gift card with the Airline of your choice! The drawing will be May 1st!

[Medical Transportation Summit](#)
July 28-30, 2015

Thank our sponsor!





Compliance: *Fact & Fiction*

April, 2015, Vol 1, No 5, page 2

Are you a “Business Associate?”

Protection of patient confidentiality is an important practice for many health care and health information management professionals; covered entities can build upon those codes of conduct to develop the reasonable safeguards required by the Privacy Rule.

The Privacy Rule allows covered providers and health plans to disclose protected health information to these “business associates” if the providers or plans obtain satisfactory assurances that the business associate will use the information only for the purposes for which it was engaged by the covered entity, will safeguard the information from misuse, and will help the covered entity comply with some of the covered entity’s duties under the Privacy Rule. Covered entities may disclose protected health information to an entity in its role as a business associate only to help the covered entity carry out its health care functions – not for the business associate’s independent use or purposes, except as needed for the proper management and administration of the business associate.

Business Associates. 45 CFR 164.502(e), 164.504(e), 164.532(d) and (e)

The Privacy Rule requires that a covered entity obtain satisfactory assurances from its business associate that the business associate will appropriately safeguard the protected health information it receives or creates on behalf of the covered entity. The satisfactory assurances must be in writing, whether in the form of a contract or other agreement between the covered entity and the business associate.

Exceptions to the Business Associate Standard. The Privacy Rule includes the following exceptions to the business associate standard. See 45 CFR 164.502(e). In these situations, a covered entity is not required to have a business associate contract or other written agreement in place before protected health information may be disclosed to the person or entity.

Other Situations in Which a Business Associate Contract Is NOT Required.

With a person or organization that acts merely as a conduit for protected health information, for example, the US Postal Service, certain private couriers, and their electronic equivalents.

FACT: In order to know if you are considered a “certain private courier” who may be exempt, you need to assess your risk. What is your courier carrying? In many cases if you’re doing pharmaceutical deliveries, you’re carrying a significant amount of PHI so will not be exempt. Even if you’re just covering single STATs vs an entire route for a diagnostic reference lab, 99+% of the time, patient requisitions will have enough information on them that will ensure you will not be exempt.

Source: <http://www.hhs.gov/ocr/privacy/hipaa/understanding/coveredentities/businessassociates.html>



Compliance: *Fact & Fiction*

April, 2015, Vol 1, No 5, page 3

CLIA...OSHA...CFR...

When a lab tells you during a bid process or sales call that they are regulated by “CLIA,” what does that mean for you, and how can you effectively sell your service to them?

[Title 42](#) → [Chapter IV](#) → [Subchapter G](#) → Part 493 says:

§493.1232 Standard: Specimen identification and integrity.

The laboratory must establish and follow written policies and procedures that ensure positive identification and *optimum integrity of a patient's specimen from the time of collection or receipt of the specimen through completion of testing and reporting of results.*

§493.1235 Standard: Personnel competency assessment policies.

As specified in the personnel requirements in subpart M, *the laboratory must establish and follow written policies and procedures to assess employee and, if applicable, consultant competency.*

Many courier companies who use IC's avoid understanding federal regulations because they use the word, “employee.” Educating yourself on what the labs are required to ask of you though, whether you use employees or IC's, will obviously give you a stronger edge.

The bottom line is clearly stated in OSHA's Bloodborne Pathogen *Scope and Application* that ...applies to all occupational exposure to blood or other potentially infectious materials (29 C.F.R. 1910.1030 (a).

What if your driver calls and in to report that a 24-hour urine was leaking and he got urine on his hands? Do your drivers, dispatchers, and Administrative staff understand what an exposure is and what procedure they should follow? Do you know that an “*Exposure Incident* means a specific eye, mouth, other mucous membrane, *non-intact* skin, or parenteral contact with blood or other potentially infectious materials...” So was this driver “exposed,” or not?

If I add this definition, does it make your decision any easier? “*Parenteral* means piercing mucous membranes or the skin barrier through such events as needle sticks, human bites, cuts, and abrasions.”

How about this one? Do you know that “*Other Potentially Infectious Materials* includes *saliva in dental procedures*, and any unfixed tissue or organ (other than intact skin) from a human (*living or dead*)?”

Assessing your operations on a routine basis and using the tools and resources we provide our members in conjunction with applicable training opportunities will ensure that you know and understand your client's needs, and have the ability to meet them.

Source: <http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=62f641c347e9735f3e2934ec425f217f&h=L&mc=true&n=pt29.6.1910&r=PART&ty=HTML>



**LORI KLEIMAN,
Performance Management
& HR Specialist**

April, 2015, Vol 1, No 5, page 4

Retention is a lot easier than recruiting!

Recruiting is often considered to be a key function of management. But wouldn't it make sense if we put the focus on retention of top talent? Yes, some employees and IC's need to go – and for those positions it is critical that your recruiting skills find you a great replacement. The key is to make sure that you keep the people that drive your business forward.

According to a study by Jobvite – 71% of the US labor force is on in the job market. Of those – 51% are actively employed which means that it is possible that up to half of your current workforce is currently looking for a new position.

The first key to retention is to understand your turnover. Track the employees and IC's that are leaving and be honest about the reason they left. Is there a pattern relating to a certain period of time with your company, or maybe a particular policy that is driving people away? One solution may not fit all, and to find the right solution you need the data to tell you where to start.

As the economy continues to improve, we will see employees and IC's looking for new opportunities. They often prefer to consider opportunities within their current situation, but if those are not crystal clear they will not think twice of looking elsewhere! Have open and honest conversations about what they feel is missing from your organization and what would make them consider another job offer or bid. The answer will not be monetary as often as you may think. Feeling like a valued part of the team that is contributing to business success is often what people are looking for today.

Recruiting is still an essential function of every organization. Excellent recruiting can ensure low turnover and a highly engaged team. Once that effort is put into the process, ensure the time is well spent by focusing on retention of top talent as a long term recipe for success.

For more information about Lori or to get more information visit her website at HR_Topics.com



Join our group on LinkedIn
“Medical Courier Connection”
Connect with us on Twitter or Facebook at
“MedCourierCnx”

As members of “the Connection,” each month you will receive our electronic newsletter that will have regular columns written by Industry professionals and members of our Advisory Board, links to other valuable resources, and other industry news. If you prefer to obtain the newsletter from the website rather than in your email, please email linda@medicalcourierconnection.com and we will remove you from the list.

Benefits of Membership

- Inclusion in the Business Directory that we make available to Healthcare Professionals seeking medical-specialty courier services.
- Connecting you through Exposure at Healthcare Industry-related conferences we attend and ads we place in medical journals
 - Free monthly live webinars with Industry professionals & Advisory Board members
 - Free monthly e-newsletter (this very thing! ☺)
 - Access to Free publications, past webinars and previous Medical Transportation Summit presentations (2013 is posted and ready to view!) Just email Linda for access
 - Networking - don't miss out on this valuable perk! Come to a future Medical Transportation Summit or join our LinkedIn Group (Medical Courier Connection)
- Participating in Charity events? Let us know! The Medical Courier Connection would like to offer support, representation and/or sponsorship!
- Access to our Advisory Board! Do you have an important bid coming up and have questions about processes or have a client whose position you just can't seem to understand? Give us a call or connect with a member of our Advisory Board!
 - Have ideas for other incentives? Let Linda know!

Please remember, when contacting anyone on the Advisory Board directly, please remember to begin by telling them you are a Member of the Medical Courier Connection. Thank you!

Meet our Advisory Board

who have made a one-year commitment to provide regular articles, at least one live webinar, and to be available to our Members to answer Industry-related questions



MORE THAN FLEET MANAGEMENT



Gain the competitive advantage real-time GPS monitoring for fleets, shipments and facilities through one GxP compliant platform **RouteWatch**; managing product integrity and protecting your clients brand.

For more information on *protecting* your fleet,
drivers and cargo, call 7PSolutions *today!*

www.7psolutions.biz | +1.317.641.1201 | info@7psolutions.biz