

VOLUNTEER RISK AND PROGRAM MANAGEMENT POLICIES

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Introduction

The Senior Medicare Patrol (SMP) program and Senior Health Insurance Counseling for Kansas (SHICK), part of the national State Health Insurance Assistance Programs (SHIP), rely on volunteers to serve the Medicare beneficiaries within their states and territories. Without sound volunteer policies, there are inherent risks to the SMPs and SHIPs in recruiting and using these volunteers. With that in mind, the Kansas Department for Aging and Disability Services (KDADS) and the Administration for Community Living (ACL) have developed a set of volunteer policies which are described in this document. These volunteer policies are designed to establish and organize the structure and operation of volunteer programs within SHICK/SMP. They describe the governing principles and values that shape and guide volunteer involvement, set expectations regarding the management of volunteer programs, delineate core expectations of SHICK/SMP volunteers, and broadly describe what volunteers may expect from SHICK/SMP.

The purpose of these volunteer policies is to enhance the quality, effectiveness, and safety of SHICK/SMP services through the provision of guidance and direction to SHICK/SMP staff and volunteers. The volunteer policies are intended to support internal program management. They do not constitute, either implicitly or explicitly, a binding contractual or personnel agreement.

The volunteer policies are consistent with, and support the missions of, SHICK and SMP programs, fostering the ethical, productive, and rewarding engagement of volunteers in SHICK/SMP services.

KDADS reserves the exclusive right to change any aspect of these volunteer policies at any time and to expect adherence to the changed policy by SHICK/SMP programs, SHICK/SMP volunteers, and partners who serve as SHICK/SMP subgrantees.

What is SHICK?

People with Medicare often have questions about health insurance. Frequently they have limited resources to obtain objective information. Many need information and assistance regarding their decisions in the following areas:

- What kinds of benefits would suit their needs;
- What type of health insurance coverage they should have;
- How much health insurance coverage they should have;
- How to take advantage of the coverage they already have.

Some people with Medicare have problems such as the following:

• They don't know what to do about rising health insurance premiums;

- They are overwhelmed with claims paperwork, and they don't know what they owe and what they don't owe;
- They can't afford the cost of prescription medications;
- They don't know where to get help with their health insurance and other problems.

To help with these needs, Congress created State Health Insurance Assistance Programs (SHIPs). The State Health Insurance Assistance Program, or SHIP, is a state-based program that offers local one-on-one counseling and assistance to people with Medicare and their families. Through CMS funded grants directed to states, SHIPs provide free counseling and assistance via telephone and face-to-face interactive sessions, public education presentations and programs, and media activities. There is a SHIP in every state as well as in Guam, Puerto Rico, the Virgin Islands, and the District of Columbia. Senior Health Insurance Counseling for Kansas (SHICK) is the SHIP for Kansas.

SHICK mission

SHICK educates the public and assists consumers on topics related to Medicare and health insurance so they can make informed decisions.

Two primary services support the SHICK program's mission:

1. Information and Education

Consumer education, provided in several ways, reaches a broad section of the population. Consumer education services provide objective information about Medicare A, B, C, & D, Medicare supplement insurance, long-term care insurance, prescription drug assistance, receiving Medicare through managed care plans and other insurance-related topics. Consumers receive information through public forums, presentations to organizations and groups, displays, radio, television, and a variety of printed materials.

2. One-on-One Counseling

One-on-one confidential sessions with trained counselors focus on specific information or problems. Individual counseling sessions are an effective way to objectively provide information on health insurance coverage, claims assistance, and referrals to appropriate agencies. Individual decision-making and problem-solving are always supported.

What is SMP?

Billions of federal dollars are lost annually due to healthcare fraud, errors, and abuse. The ACL's Office of Healthcare Information & Counseling manages the SMP grants. SMPs work to resolve beneficiary complaints of potential healthcare fraud in collaboration with state and federal partners, including the U. S. Department of Health & Human Services Office of the Inspector

General, Centers for Medicare & Medicaid Services, state Medicaid fraud control units, and state attorneys general.

SMPs were authorized in 1997 under Titles II and IV of the Older Americans Act, the Omnibus Consolidated Appropriation Act of 1997 and the Health Insurance Portability and Accountability Act of 1996. SMPs began as demonstration projects in 12 states. Currently, SMP grants are provided to all 50 states, District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands.

SMP mission

Senior Medicare Patrol empowers and assists Medicare beneficiaries, their families, and caregivers to prevent, detect, and report health care fraud, errors, and abuse through outreach, counseling, and education. SMPs are grant-funded projects of the federal U.S. Department of Health and Human Services (HHS), U.S. Administration for Community Living (ACL). Their work is in three main areas:

1. Conduct Outreach and Education

SMPs give presentations to groups, exhibit at events, and work one-on-one with Medicare beneficiaries to prevent, detect, and report potential Medicare fraud.

2. Engage Volunteers

The SMP program is a volunteer-based program. Protecting older persons' health, finances, and medical identity while saving precious Medicare dollars is a cause that attracts civic-minded people to volunteer for the SMP program.

3. Receive Beneficiary Complaints

When Medicare beneficiaries, caregivers, and family members bring their complaints to the SMP, the SMP makes a determination about whether or not fraud, errors, or abuse is suspected. When fraud or abuse is suspected, they make referrals to the appropriate state and federal agencies for further investigation.

Use of policies with paid partners or in-kind staff

These policies were created with true volunteers in mind, meaning those volunteers that do not receive regular compensation for their time and effort. Some of the items within this document are not appropriate for use with paid or in-kind staff and should not be applied to these counselors and team members. Many policies, however, such as those related to screening and training, are simply good practice and should be considered for implementation for all SHICK/SMP counselors and team members.

KDADS expects that SHICKs and SMPs will ensure proper training, screening, and supervision is provided to all team members. This includes holding all counselors and team members accountable for the work that they do. SHICKs and SMPs should use the policies and procedures presented here (along with support materials provided by the <u>SHIP National Technical Assistance</u> <u>Center</u> and <u>SMP National Resource Center</u>) to help frame the management of the SHICK and SMP programs and their counselors and team members.

Section 1.0: Introductory Volunteer Engagement Policies

These five policies set the stage for volunteer engagement within the SHICK and SMP programs and provide context for the policies that follow in subsequent sections.

1.1 Overall policy on engagement of volunteers

Policy: KDADS accepts and encourages the involvement of volunteers at a range of levels and within all appropriate projects and activities. Involvement of volunteers is a requirement of the SHICK/SMP.

Rationale: The achievement of the goals of the SHICK/SMP is best served by the active participation of citizens of the community. Volunteers are an integral part of the SHICK/SMP team and are essential to effective delivery of SHICK/SMP services to beneficiaries. Volunteers contribute unique talents, time and knowledge, complementing the skills and dedication of SHICK/SMP paid staff.

1.2 Scope of the volunteer policies

Policy: Unless specifically stated, these volunteer policies apply to all volunteers in all programs and projects undertaken by or on behalf of the SHICK/SMP, including volunteer involvement that is organized and managed by SHICK/SMP subgrantees. The pivotal variable in the application of these volunteer policies is volunteers' performance of SHICK/SMP duties. Where volunteers are clearly performing what could reasonably be called "SHICK/SMP duties" under the direction and control of the SHICK/SMP, those volunteers and their coordination are subject to the provisions of these volunteer policies.

Rationale: The policies apply throughout the SHICK/SMP system to all entities that control or manage volunteers performing SHICK/SMP work. These volunteers who are also agents of the SHICK/SMP while working day-to-day with other partners (subgrantees), are still the responsibility of the SHICK/SMP. Noncompliance creates potential risk to volunteers themselves and/or beneficiaries and potential liability for the SMP and/or the subgrantee.

Definitions: See the <u>Definitions of Terms</u> section that follows these policies for further clarification about the terms volunteer and subgrantee.

1.3 Compliance

Policy: Volunteers are made aware of all volunteer policies by subgrantees. Not knowing a policy is not acceptable if the policy has been communicated and the volunteer was made

aware. SHICK/SMP volunteers are expected to conduct their work with a view to the larger picture of what is in the best interests of the majority of SHICK/SMP beneficiaries, the integrity of SHICK/SMP programming, and the long-term reputation and sustainability of the SHICK/SMP itself. A Memorandum of Understanding acknowledging volunteer awareness of these policies is signed annually. Compliance with all SHICK/SMP volunteer policies is a minimal expectation of SHICK/SMP volunteers.

Failure to comply meets with a graduated response designed wherever possible to assist the volunteer to return to functioning inside the rules. Should reasonable efforts on the part of SHICK/SMP prove unsuccessful, further disciplinary action is taken, up to and including dismissal.

Rationale: Organizations and their volunteers exist as a team in which each of the partners brings resources to their mutual effort and each of whom possesses rights and interests that deserve protection. Volunteers have an obligation to know and understand volunteer policies and to stay current with their provisions. The policy also gives fair warning to volunteers that failure to comply with SHICK/SMP policies is subject to discipline, up to and including dismissal.

1.4 Volunteer Role Classifications

Policy: These policies apply to all roles undertaken by SHICK/SMP volunteers, whether through direct service with a SHICK/SMP or involvement in SHICK/SMP activities via a subgrantee.

The exact number and kind of volunteer roles will be determined by KDADS' SHICK/SMP programs. Volunteers may be qualified to serve in one or more role(s).

Examples of SHICK/SMP volunteer roles include, but are not limited to, the following:

- Administrative Support Aide: This role involves such work as copying, filing, data entry, and placing outbound phone calls in support of Medicare Grants activity. Volunteers who work in this role do not take inbound phone calls or field questions from the public. It is a position of trust.
- Complex Interactions Specialist: Through specialized training, this role involves direct discussion with beneficiaries, their families, caregivers, providers, CMS, and other entities to assist beneficiary in reporting potential fraud, errors, and/or abuse.
- 3. Counselor: This role involves direct discussion with beneficiaries about their individual situations and may include review of personal information such as Medicare Summary Notices, billing statements and other related financial and health documents. May include handling complex issues and referrals. Volunteers who service in this role may act on behalf of a beneficiary to correct an error or refer suspected fraud and abuse to appropriate authorities. It is a position of trust.

- 4. **Exhibitor**: This role involves staffing information kiosks or exhibits at events such as health fairs. Volunteers who staff exhibits provide general information about Medicare Grants to the public and answer simple inquiries. It is a position of trust.
- 5. Information Distributor: This role involves transporting and disseminating Medicare Grants information materials to sites and events and may include presenting prepared copy or performing scripted activities for small groups. Volunteers who work in this role do not engage in discussions with others about personal information or situations. It is not considered to be a position of trust.
- 6. **Presenter**: This role involves giving substantive presentations on Medicare Grants topics to small and large groups, with the opportunity for interaction with the audience during time set aside for Q & A and discussion. It is a position of trust.
- 7. Mentor: This role is for experienced volunteers only and involves acting as a mentor to new volunteers learning their roles. Subgrantees define mentorship guidelines and expectations.
- 8. **Scheduler:** This role involves working with the subgrantee Coordinator to assist in managing the scheduling of volunteers to ensure beneficiaries, their families, and caregivers are provided appointments and/or appropriate levels of support.

Subgrantees, in collaboration with KDADS' Medicare Grants Team, may create volunteer positions and related position descriptions that incorporate more than one role. When new roles are created, care is taken to determine the risks connected to the new role and to design appropriate role descriptions, screening, training, and supervisory procedures.

Rationale: The intent is to reduce the burden of imposing in-depth training, screening, and supervision on all volunteers and particularly on those who perform relatively simple and safe work for the SHICK/SMP. This allows the SHICK/SMP to focus more attention and energy on working with volunteers who perform more complex tasks.

1.5 Policy changes and interpretation

Policy: Amendments, additions, updates or exceptions to the Kansas SHICK volunteer policies may only be issued or granted by KDADS. All requests to amend, add to, update, or grant exceptions to the policies must be submitted in advance and in writing to the State SHICK Office. Questions from volunteers, staff, or affected partners regarding interpretation of these policies should be addressed to the KDADS Medicare Grants Director or Medicare Grants staff for clarification.

Section 2.0: Risk Management and Health and Safety

The safety of SHICK/SMP personnel is paramount. The SHICK/SMP strives to operate a healthand-safety-conscious work environment and deliver safe and reliable services to its beneficiaries. The subgrantees are responsible for the safety and well-being of volunteers just as they are for the safety and well-being of their paid personnel.

2.1 Risk assessment

Policy: Every three years KDADS' SHICK/SMP personnel conduct a risk assessment on the roles, work, and activities of SHICK/SMP volunteers. Risk assessment identifies risks, assesses their magnitude, and re-examines the measures the SHICK/SMP already has in place to control and mitigate risks.

Also assessed regularly in connection with risk are training and qualification procedures, volunteer performance management, volunteer program management processes and activities, and volunteer worksite(s).

Risk management strategies are implemented as needed, including local-level procedures that identify, prevent, and reduce the incidence and impact of risk.

2.2 Insurance

Policy: Volunteers are encouraged to consult with their own insurance agents regarding the extension of their personal insurance to include community volunteer work.

2.3 Automobile insurance coverage

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

Automobile insurance coverage is verified at least annually by each volunteer signing off on the Memorandum of Understanding completed at annual training. This signed certification is retained in the volunteer's personnel file. Volunteers immediately notify their supervisor if their automobile insurance coverage lapses.

2.4 Safety training

Policy: Volunteers are informed by the subgrantee of foreseeable hazardous aspects, materials, equipment, or processes they may encounter while performing volunteer work and are trained and equipped in methods to deal with all identified risks. Training for volunteers includes discussion of safe work practices and methods for responding to potentially hazardous situations. Volunteers exercise caution in all work activities.

Volunteers who violate safety standards, who cause hazardous or dangerous situations, or who fail to report such situations to their local SHICK/SMP coordinator are subject to disciplinary action, up to and including dismissal.

2.5 Reporting of abuse

Policy: SHICK/SMP volunteers who witness instances of physical, psychological, financial or verbal abuse of consumers while performing their assigned duties report this to their SHICK/SMP coordinator so that appropriate follow-up action may occur.

2.6 **Privacy and location of counseling**

Policy: Face-to-face work with individual beneficiaries primarily takes place at SHICK/SMP offices (or those of partner agencies). Where beneficiaries are unable to travel to the SHICK/SMP (or partner's) office, volunteers discuss with their supervisor alternate meeting arrangements that will maintain beneficiary privacy. Off-site counseling work is not undertaken by volunteers without prior approval.

Where one-to-one information is requested by an audience member at a public presentation, SHICK/SMP volunteers provide only general information and do not gather personal, financial, or other confidential information from the beneficiary. Inquiries that involve the collection of such personal, financial or other confidential information are referred for a more formal counseling session in an appropriately private location.

2.7 Home visits

Policy: When home visits by SHICK/SMP volunteers to a beneficiary's residence are determined to be necessary, the subgrantee is required to have protocols in place to ensure the safety of the volunteers and the beneficiaries involved.

The following are examples of protocols that could be used:

- Visits are made in pairs (two volunteers or a volunteer and a staff member).
- Notice of the visit is provided to at least one other "on-alert" SHICK/SMP staff along with travel start and projected return times, beneficiary name, address, and phone number.
- At least one of the two visitors has a charged and working cell phone.

- The availability of cell phone or land line coverage is checked before entering the home; where phone coverage does not exist, the visit is cancelled.
- Volunteers who do not feel comfortable as they approach the home, or who become uncomfortable or threatened during a visit, terminate the visit in a non-confrontational manner and report the event to their SHICK/SMP coordinator as soon as possible.
- Visiting volunteers notify the on-alert SHICK/SMP coordinator immediately upon their return from the visit.
- If return of the volunteers is overdue by more 15 minutes, the on-alert SHICK/SMP coordinator attempts to contact the visiting staff by cell phone as pre-arranged; two attempts to reach the visiting staff are made at five-minute intervals.
- Failure to reach the visiting volunteers after two attempts triggers an immediate notification to the coordinator of volunteers or other SHICK/SMP manager who implements further action as required, including, for example, calling the beneficiary's home, notification of authorities, and 911 contact.

A SHICK/SMP volunteer should meet the beneficiary in a safe and secure public place that also provides an environment suitable for the exchange of confidential information, such as a neighborhood library, or by arrangement with a partner agency located more conveniently for the beneficiary.

2.8 Incident reporting

Policy: Any accident or injury to or by a volunteer is reported immediately to the SHICK/SMP coordinator and then the local SHICK/SMP coordinator shall notify the KDADS Medicare Grants Director. An "incident" may include, but is not limited to, an error in judgment, other misstep, or substandard performance (particularly in relation to provision of services to beneficiaries), lost possession, boundary breach, offensive remark, or sense of risk or peril while on duty. An incident reporting form and protocol exists. Volunteers complete required incident reporting form by close of business that day (if possible).

2.9 Incident response

Policy: In response to a reported incident involving SHICK/SMP volunteers, the local SHICK/SMP coordinator ensures/oversees the notification of relevant authorities (e.g., KDADS Medicare Grants staff, police, public health, insurance, etc.) as appropriate and undertakes subsequent steps necessary to respond to and resolve the incident.

2.10 Emergency contact procedures

Policy: The SHICK/SMP subgrantee has emergency contact information on all of its volunteers – even short-term volunteers – and a procedure that enables volunteers to communicate with the SHICK/SMP coordinator or other supervisory personnel from the subgrantee agency at any time volunteers are on duty. Response to emergency

communications takes place without delay. Volunteers should be able to reach their SHICK/SMP coordinator or other supervisory personnel from the subgrantee agency in the event of an incident, danger, or substantive programming question while on duty. It is equally critical that the organization is able to reach the volunteer in the event of a change of schedule or other event that requires off-hours contact.

2.11 Disaster plan

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

Section 3.0: Volunteer Program Management

The policies in this section pertain to volunteer program management. They are divided into the following subcategories.

- Infrastructure
- Role design
- <u>Recruitment</u>
- <u>Screening</u>
- <u>Placement</u>
- Orientation and training
- <u>Performance management</u>
- Volunteer behavior, performance, and roles
- <u>Retention and recognition</u>
- Volunteer/paid staff relationships

Infrastructure

3.1 Fair and equitable application

Policy: SHICK/SMP policies guiding volunteer program management apply equally to all SHICK/SMP volunteers, and compliance with these policies is a condition of continued volunteer involvement in the SHICK and SMP programs.

3.2 Community representativeness

Policy: SHICK and SMP strive to develop volunteer populations that mirror the diversity of the community in which it operates. The more representative a volunteer population is of the population within the area that it serves, the easier it is to reach out to new volunteers and be effective in serving all constituencies.

3.3 Service at the discretion of KDADS

Policy: The SHICK/SMP accepts the service of volunteers with the understanding that such service is at the sole discretion of KDADS. Volunteers agree that KDADS may at any time decide to terminate the volunteer's relationship with the SHICK/SMP or to make changes

in the nature of their volunteer assignment. At the same time, volunteers reserve their own right to, at any time and for any reason, resign from SHICK/SMP.

3.4 Volunteer rights and responsibilities

Policy: Volunteers are viewed as a valuable resource to the SHICK/SMP, its staff, and its beneficiaries. Volunteers have the right to be given meaningful assignments, the right to be treated as equal co-workers, the right to effective supervision, the right to be informed about significant matters affecting their roles and the right to recognition for work done.

In return, volunteers agree to actively perform their duties to the best of their abilities, comply with these Volunteer Polices and other work-related direction and provisions, and remain loyal to the values, goals and procedures of the SHICK/SMP.

3.5 Volunteer program management system

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

The volunteer program management system may include, but is not limited to:

- communication system
- reporting and accountability system
- program evaluation system
- performance management system
- risk management system
- operating budget
- staff resources
- accessible, appropriate physical space and necessary equipment

3.6 KDADS Medicare Grants staff

Policy: The KDADS SHICK program staff must supply subgrantees with volunteer training materials and updates received from ACL, CMS and other sources. The KDADS Medicare Grants staff is involved in all significant SHICK/SMP decisions likely to affect volunteers and the volunteer program management system.

3.7 Coordinator of volunteers

Policy: SHICK/SMP subgrantees must have at least one staff person with designated responsibility for coordinating and managing the involvement of volunteers. As required by program or budgetary limitations, this role may be shared among staff.

The SHICK/SMP coordinator works to plan, develop and manage a unified and consistent process for the involvement of volunteers. The SHICK/SMP coordinator takes the lead in assisting in creating and implementing productive and effective volunteer involvement, ensuring a quality volunteering experience. The SHICK/SMP coordinator is involved in all significant SHICK/SMP decisions likely to affect volunteers and the volunteer program management system.

SHICK/SMP coordinators are selected for their professional skills and experience in working with volunteers and receive additional training in volunteer program management as necessary. Staff and budgetary allocations are made to ensure that the SHICK/SMP coordinator position is appropriately remunerated and staffed to a level sufficient to ensure effective management of the program. If such responsibility is designated as a part-time responsibility, then other duties are reduced to allow sufficient time and focus to ensure attainment of high standards of volunteer program management, including compliance with all pertinent portions of these volunteer policies.

3.8 Resources for volunteer support and involvement

Policy: An annual budget for the volunteer management unit is formulated based on the amount of available federal funds. The volunteer program management budget provides for space, financial resources, and support staff to operate the SHICK/SMP program in an effective manner.

3.9 Maintenance of records

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

- application and related information gathered in the screening process
- dates of service
- positions held
- training and orientation received
- duties performed and achievements attained
- performance records including appropriate documentation of any performance issues
- awards received
- record of exit
- current contact information

Volunteers and relevant staff submit all appropriate records and information to the Coordinator of volunteers in a timely and accurate manner.

Accurate and current records regarding volunteers are essential to a volunteer program because they provide the data that allows for continuous and consistent supervision, even if there is staff turnover. Volunteer personnel records are accorded the same confidentiality as staff personnel records. Volunteer records are kept in a secure location and requests for information contained in the records are approved as appropriate by KDADS.

3.10 Volunteer access to personnel record

Policy: Upon reasonable notice, volunteers may examine the contents of their own personnel file. Volunteers wishing to access their files shall contact KDADS' Medicare Grants staff. Inactive files will be maintained for a minimum period of seven years after the volunteer's involvement with SHICK/SMP ends.

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

Policy: The local SHICK/SMP coordinator conducts regular evaluations of both volunteer involvement and the infrastructure in place to support volunteer involvement in the SHICK/SMP program. The SHICK/SMP coordinator provides periodic reports to KDADS' Medicare Grants staff on current operations and future needs. These evaluations include feedback from both volunteers and paid staff, along with community partners as appropriate. The evaluations outline future goals and plans for improvement in the use of volunteers by the SHICK/SMP.

Role Design

3.12 Volunteer role development

Policy: Volunteers may fill a wide range of standard roles at the SHICK/SMP. All roles must conform to the primary goals of the SHICK/SMP program. KDADS' Medicare Grants staff and SHICK/SMP coordinators are encouraged to identify possible new roles for SHICK/SMP volunteers. often have many valuable skills that should be identified so that the volunteers can be assigned to work congruent with the volunteer's interests and abilities which fulfill the goals of the SHICK/SMP program.

3.13 Volunteer-Staff interface

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

3.14 Role descriptions

Policy: Prior to any recruitment effort or volunteer assignment, a role description is developed for each volunteer position. It is important that volunteers read and understand

the description of the duties he/she is asked to perform. After volunteers have been accepted into the volunteer program, volunteers shall fulfill the duties identified in the role description. If a volunteer's role changes while they are volunteering, the volunteer shall be provided an updated description to review prior to starting the new role and responsibilities. A written role description helps ensure volunteers understand their role and its responsibilities.

All role descriptions include, but may not be limited to the following:

- purpose of the role
- role duties
- designated supervisor
- worksite location(s)
- time frame for the performance of the work along with work schedule
- qualifications
- benefits of the role to volunteers

Role descriptions are reviewed and updated at least annually by the KDADS Medicare Grants staff, or whenever a role changes substantially.

3.15 Standards of performance

Policy: Standards of performance are established for each volunteer role. A copy of the relevant standards of performance is provided to all volunteers at the beginning of their assignment. Performance standards are the basis for both communicating expectations and appraising volunteer performance. Failing to create and communicate standards of performance is both unfair and almost certain to hamper program goal attainment.

3.16 Refusal of assignments

Policy: Volunteers are expected to refuse work assignments whenever an assignment exceeds the parameters of the volunteer role description, requires the volunteer to perform a function for which they have not been trained or are not qualified, or exceeds the limits of their individual capacity. Volunteers must have the right to refuse assignments and must feel comfortable doing so. Refusing such assignments shouldn't affect their position with the agency.

3.17 Paid staff requests for volunteers

Policy: The SHICK/SMP coordinator recruits and places volunteers only in settings where staff are clearly supportive of volunteer involvement and willing to work together with, and provide support for, volunteer participation. Requests from paid staff for volunteer assistance must be approved by the SHICK/SMP coordinator.

3.18 Worksite

Policy: A safe and appropriate worksite is established for every volunteer. It is the responsibility of the SMP/SHICK subgrantee to ensure that their volunteers are working in a safe and well-equipped environment. Volunteers recognize efforts to attend to their well-being, and such efforts convey a sense of welcome and appreciation. Safe and appropriate worksites contain facilities, equipment, and space necessary for volunteers to perform their duties safely, effectively, and comfortably.

3.19 Length of service

Policy: Terms of service are agreed upon at Initial Training, with an option for annual renewal by attending Update Training and signing the Memorandum of Understanding (MOU).

Volunteers are neither expected nor required to continue their involvement with the SHICK/SMP program. At any time, volunteers may seek a different volunteer assignment within the SHICK/SMP program or with another organization or may retire from volunteer service.

3.20 Leaves of absence

Policy: At the discretion of the KDADS Medicare Grants staff, in consultation with the volunteer's SHICK/SMP Coordinator at the subgrantee organization, leaves of absence are granted to volunteers in advance of the timeframe requested for leave. If an emergency arises that requires the volunteer to leave without place a request for leave in advance, the volunteer is required to inform their local SHICK/SMP Coordinator as quickly as possible that a leave of absence is needed and for approximately how long the volunteer will be away. If the leave is of significant duration, retraining may be needed in advance of re-entry.

Recruitment

3.21 Recruitment

Policy: Volunteers are recruited by the SHICK/SMP program on a proactive basis, with the intent of broadening and extending SHICK/SMP services to beneficiaries. Acceptance as a volunteer is not automatic. Volunteers fulfill all screening, orientation and training requirements for the role in which they are interested before being accepted into service. From time to time, recruitment campaigns may be launched to attract volunteers who may better serve targeted beneficiary populations. Volunteers are recruited through a variety of mechanisms. They enter the application process either through an interest in a specific function, or through a general interest in volunteering for the SHICK/SMP, in which case they will later be matched with a specific function.

3.22 Non-Discrimination

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

3.23 Advertisement of volunteer opportunities

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

3.24 Communication with prospective volunteers

Policy: Response to people who express an initial interest in volunteering with the SHICK/SMP program is prompt. A response protocol exists to prevent undue delay and ensure that prospective volunteers receive a welcoming and effective recruitment message.

3.25 Wait list

Policy: If volunteer opportunities are not immediately available or initial volunteer training is not available quickly, the SHICK/SMP may maintain a wait list of interested prospective volunteers and promptly communicate opportunities when they become available and/or help volunteers find other suitable volunteer work.

Screening

3.26 Selection policy

Policy: The decision to accept (or not) each volunteer applicant is based on careful consideration of all pertinent information gathered in the screening process.

The SHICK/SMP program strives to maintain a safe and productive workplace with honest, trustworthy, reliable and qualified volunteers who do not present a risk of harm to themselves, other persons, or the reputation of SHICK/SMP. Screening processes are clear and comprehensive and standards are never waived, even for persons known to the screener.

Screening inquiries are limited to collecting information directly connected to the ability of the applicant to effectively perform volunteer work for the SHICK/SMP. The SHICK/SMP program applies a formal selection process to all prospective volunteers. This process varies according to the nature and degree of responsibility in the work to be done, access

to money or other valuables, access to personal or confidential information, and/or access to beneficiaries or members of the public.

Positions of trust are subject to significantly more rigorous screening inquiries.

3.27 Screening authority

Policy: Screening and acceptance decisions are made by KDADS Medicare Grants staff.

3.28 Equity and human rights compliance

Policy: While screening processes vary by role, applicants for any given role are screened in the same way as all other applicants for that same role. All screening inquiries and decisions comply with relevant human rights requirements.

3.29 Right of refusal

Policy: Acceptance as a volunteer is not automatic. The SHICK/SMP reserves the right not to accept applicants based on an objective and equitable assessment of their suitability. Screening and placement decisions must focus solely on the ability of the applicant to do the work and meet performance standards.

3.30 Full disclosure of process and volunteer consent

Policy: Prospective volunteers are notified early in the application process about the range of screening inquiries used by the SHICK/SMP for its various volunteer roles. No screening inquiry is undertaken without the prior knowledge and permission of the applicant.

Prospective volunteers agree to the right of KDADS Medicare Grants staff to conduct appropriate inquiries regarding the background and qualifications of applicants and cooperate fully in the fulfillment of these checks. Prospective volunteers have the right to refuse permission for any line of screening inquiry in which case the SHICK/SMP program reserves the right to terminate the application process and refuse acceptance as an SHICK/SMP volunteer.

Applicants are informed of a projected time line of the screening process at the time of their initial interview. They are updated if screening takes longer than expected. Prospective volunteers are informed of the outcome of their application as expeditiously as possible, preferably within one week of the decision.

Applicants sign an agreement allowing KDADS Medicare Grants staff to complete screening inquiries.

3.31 Application form

Policy: A standardized application form is completed by all prospective SHICK/SMP volunteers.

3.32 Interviews

Policy: All prospective volunteers are interviewed to ascertain their suitability for, and interest in, various roles in the SHICK/SMP program. Interviews determine volunteers' qualifications and commitment to fulfill the requirements of the role and provide ample opportunity for interviewees to ask questions about the program, volunteer duties, and gain any other information they may need to make an informed decision about volunteering with the SHICK/SMP. Interviews are conducted either in person or by other means such as by telephone or internet. Whenever possible, however, interviews are conducted in person because this both allows the SHICK/SMP to better evaluate the volunteer and allows the volunteer to better form a positive opinion of the SHICK/SMP.

3.33 Conflict of interest

Policy: No person who has a conflict of interest in connection with the work they will do for SHICK/SMP, whether personal, philosophical, or financial may serve as a volunteer. Volunteers do not promote any personal or business interest while undertaking their SHICK/SMP assignment.

One example of persons with an inherent conflict of interest is anyone who receives compensation for enrolling beneficiaries in a specific insurance plan or plans.

SHICK/SMP volunteers sign a conflict of interest statement as part of the application and screening process and agree to immediately notify their local SHICK/SMP Coordinator if any potential conflict arises during performance of their duties. All possible conflicts of interest are immediately reported by SHICK/SMP Coordinator to the KDADS Medicare Grants Director.

3.34 Background checks

Policy: Background checks are an essential screening step before a volunteer begins work with Kansas consumers. Background checks may include, but may not be limited to, verification of:

- 1. identity
- 2. volunteer history and experience
- 3. employment history and experience
- 4. education
- 5. social security number

Note that in common usage the term "background check" is sometimes synonymous with "criminal records check." In these policies, the two are very different things. A "background check" includes any or all of the five checks noted in the policy above, while the term "criminal records check" refers specifically and only to a check of an applicant's criminal history; it is not part of the background check, but is separate from it (see next policy).

3.35 Criminal records check

Policy: All prospective volunteers applying for any position of trust in the SHICK/SMP program are required to undergo a national-level criminal record check initiated by KDADS.

The SHICK/SMP program has a protocol for determining which criminal violations render an applicant unsuitable SHICK/SMP assignments.

The presence of a criminal record is not an automatic disqualifier from SHICK/SMP volunteer work. The nature of the offense, when it occurred, and other pertinent information are considered in combination with all other information gathered in the screening process, and the acceptance decision is based on an overall assessment of the qualifications and appropriateness of the candidate for the role in question.

3.36 Driver's license and record checks

Policy: Prospective volunteers whose volunteer responsibilities at SHICK/SMP involve operation of a motor vehicle are subjected to two specific screening inquiries:

- proof of valid driver's license
- driver's record check

Driving offenses may disqualify applicants for roles involving driving. The nature and number of the offense(s) and when it (they) occurred will be considered in the screening decision.

3.37 Limiting conditions affecting volunteer work

Policy: Volunteers who have any medical or psychological condition that might affect the safe and effective performance of their volunteer work are requested to consult with their subgrantee organization's SHICK/SMP Coordinator about their ability to perform their assigned duties. This is a safety precaution for both the volunteer and the SHICK/SMP to be used when there may be doubt about a volunteer's capacity to continue or take on the work assigned. This screening device can be used in the initial volunteer intake process or at some later point when ongoing capacity to perform assigned duties comes into question.

3.38 Probationary period

Policy: All new volunteers are considered to be probationary after their initial training is complete. After new volunteers have completed a mentoring period with an experienced counselor and are ready to counsel individually, they will no longer be considered to be probationary. Adjustments are made wherever appropriate. If it is determined by either party during the probation period that involvement in the work of the SHICK/SMP is not appropriate, termination can be immediate and without prior notice or reason provided by either party.

3.39 Documenting screening

Policy: The SHICK/SMP has a screening documentation process that sets out what documentation is created, for how long it is retained, and when it is to be destroyed. Screening documentation is both created and retained so that the organization has proof of its screening processes and a basis to defend its screening decisions in a legal action. Screening documentation becomes part of the volunteer's personnel file and is retained for seven years after the volunteer's involvement with the SHICK/SMP program terminates. For applicants not accepted as volunteers into the SHICK/SMP program, their documentation is retained for six months after the prospective volunteer has been notified of the non-acceptance of their offer of involvement.

3.40 Confidentiality of screening information

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

3.41 Incomplete or false information

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

3.42 New screening standards for current volunteers

Policy: All SHICK/SMP volunteers, regardless of length of tenure, are subject to the provisions of all volunteer policies, including new policies coming into effect during an existing volunteer's tenure. Existing volunteers must meet all new screening standards relevant to the role(s) they hold, with the exception of interviews which do not need to be initiated or repeated with existing SHICK/SMP volunteers.

3.43 Reconfirmation of screening

Policy: Criminal records checks, driver's records checks, and so on are time-limited. The SHICK/SMP program has the right to recheck various record checks (e.g., criminal records checks, driver's records check, etc.) at any time to ensure that volunteers still have a

license, haven't been convicted of serious moving vehicle violations, or haven't let their auto insurance lapse. Volunteers are required to inform their local SHICK/SMP Coordinator of any pending criminal charges that may occur after the initial screening process.

3.44 Up-Screening

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

3.45 Screening of previous volunteers

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

3.46 Revisions to the screening process

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

Placement

3.47 Placement

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

3.48 Acceptance and appointment

Policy: Service as a volunteer with the SHICK/SMP begins only after completing initial training, the training record, and the Memorandum of Understanding. No offer of acceptance is issued on a conditional basis pending, for example, the results of screening inquiries, and volunteers do not begin any work in the SHICK/SMP program until they have been formally accepted into service.

3.49 Re-assignment

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

Orientation and Training

3.50 Orientation

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

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

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

3.51 Training

Policy: Minimum initial and ongoing volunteer training requirements are established by the KDADS Medicare Grants staff and involve the delivery of a volunteer training program tailored to the SHICK/SMP program and specific volunteer roles. Volunteers must fulfill mandatory training requirements before any work is assigned.

3.52 Demonstrating qualifications

Policy: Following training, volunteers are tested on their knowledge and abilities for certain SHICK/SMP roles and must demonstrate minimum levels of comprehension and skill. For such roles, volunteers are not assigned duties until their qualification for the role is certified, using the criteria and process required by KDADS Medicare Grants staff.

3.53 On-the-job training or mentoring

Policy: Volunteers receive specific on-the-job training or mentoring which provides the information and skills necessary to perform their volunteer assignment. The timing and methods for delivery of such training are appropriate to the complexity and demands of the role and the capabilities of the volunteer. On-the-job training and/or mentoring should be done with the volunteer's local SHICK/SMP Coordinator, or an experienced and knowledgeable SHICK/SMP counselor.

3.54 Continuing education

Policy: Update training is required annually for all volunteer roles. Volunteers who are not able to meet required continuing education requirements for their role are respectfully removed from service in that role.

Performance Management

3.55 Components

Policy: A constructive, positive and success-oriented performance management system is in place for SHICK/SMP. The SHICK/SMP performance management system includes three primary components:

- supervision
- performance evaluation
- corrective action

3.56 SHICK/SMP Coordinator role

Policy: SHICK/SMP Coordinators follow performance management policies and procedures in their day-to-day work with volunteers. In instances where more support, understanding or direction is needed, the KDADS Medicare Grants staff works with the SHICK/SMP Coordinator to help the volunteer achieve necessary modifications.

3.57 Notice of performance management system

Policy: Volunteers are advised of the existence of the volunteer performance management system during their initial orientation with the SHICK/SMP. Volunteers are provided with a copy of the SHICK and SMP VPRM policies during initial training, along with any other performance management or evaluation instruments.

3.58 Right of supervision and support

Policy: The SHICK/SMP program has both the right and the obligation to provide supervision and support, to manage the work done by volunteers and to determine the nature and extent of supervisory guidance provided to volunteers. Working on behalf of the SHICK/SMP, volunteers are a critical part of the SHICK/SMP workforce. Accordingly, the KDADS Medicare Grants staff have an obligation to ensure that the performance and behavior of volunteers best serves the SHICK and SMP programs and does not diminish its ability to deliver the very best services possible to the community.

3.59 The nature of supervision and support

Policy: Supervision and support of SHICK/SMP volunteers reflects the principle of positive, constructive and success-oriented guidance that underpins the SHICK/SMP volunteer performance management system. The SHICK/SMP program is very much a success-driven rather than failure-driven system.

3.60 Acceptance of supervision

Policy: Upon acceptance into service with the SHICK/SMP program, volunteers agree to accept supervision and support from experienced SHICK counselors, team members and

SHICK/SMP Coordinators. Failure or refusal by a volunteer to accept supervision and/or to integrate the direction of the supervisor into his or her volunteer work performance are grounds for disciplinary action up to and including dismissal.

3.61 Requirement of a subgrantee

Policy: Each volunteer who is accepted to a SHICK/SMP role has an identified subgrantee organization and SHICK/SMP Coordinator who is responsible for direct supervision and support of that volunteer. SHICK/SMP Coordinators provide day-to-day guidance for the work of the volunteer, and are available to the volunteer for consultation, assistance and support. SHICK/SMP Coordinators assign volunteer duties, involve volunteers in the communication flow of the agency, and provide constructive feedback to volunteers regarding their work.

3.62 Volunteers as volunteer mentors

Policy: Experienced and qualified volunteers may be assigned volunteer mentors and support responsibilities provided that they are, themselves, under the direct supervision of a SHICK/SMP Coordinator.

3.63 Lines of communication

Policy: Volunteers receive all necessary information pertinent to the performance of their work assignments. Accordingly, volunteers are included in and have access to all appropriate information, memos, materials, meetings, and consumer records relevant to work assignments. SHICK/SMP Coordinators ensure that their volunteers receive all pertinent information. To facilitate the receipt of this information on a timely basis, volunteers are included on all relevant distribution schedules and are given a method for access to information circulated in their absence. Lines of communication operate in both directions and exist both formally and informally. Volunteers are encouraged to provide feedback and input, via their SHICK/SMP Coordinator, on the effectiveness and organization of SHICK/SMP services. All constructive suggestions are welcomed.

3.64 Evaluation of performance

Policy: Volunteers receive periodic evaluation of their work. Volunteer evaluations are conducted by the volunteer's SHICK/SMP Coordinator. Input may also be sought from KDADS Medicare Grants staff who are in a position to observe volunteer performance. Feedback on volunteer performance is non-threatening, constructive and supportive. It is an opportunity for mutual exchange and feedback. It includes formal acknowledgement of, and appreciation for, volunteer contributions. Volunteers are invited to provide input and suggestions regarding their work, SHICK/SMP services and the volunteer's relationship with the SHICK/SMP program. Paperwork related to the volunteer's tenure is updated, including the role description, personal contact information, conflicts of interest, and any licensure relevant to their duties (e.g., proof of valid driver's license, proof of automobile insurance, etc.).

3.65 Documenting performance

Policy: The substance and outcomes of volunteer performance evaluations are documented by the SHICK/SMP Coordinator and placed in the volunteer's personnel file. All plans for improvement are itemized along with mutually agreed upon follow-up dates and procedures.

3.66 Communication with KDADS Medicare Grants staff

Policy: SHICK/SMP Coordinators maintain regular communication with the KDADS Medicare Grants staff on the status of the volunteers they are supervising and are responsible for the timely submission of all necessary paperwork.

The Medicare Grants Director and staff must be informed immediately of any substantial change in the work or status of a volunteer and are consulted in advance before any corrective action is taken.

3.67 **Progressive Corrective Action**

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

3.68 Dismissal of a volunteer

Policy: Volunteers who do not adhere to the rules, policies or procedures of the SHICK/SMP program or who repeatedly fail to perform a volunteer assignment satisfactorily despite supervisory support and other corrective action interventions are subject to dismissal. All efforts should be made by KDADS Medicare Grants staff to work with the SHICK/SMP Coordinator to implement appropriate corrective actions before dismissal is considered.

The SHICK/SMP program establishes grounds for dismissal of volunteers. Individual situations vary and SHICK/SMP Coordinators, in conjunction with KDADS Medicare Grants staff, use discretion and good judgment in all decisions regarding possible volunteer dismissal. Dismissal of volunteers is typically a last resort, applied only when other available and appropriate corrective actions have not been successful. The decision to dismiss is at the direction of the local SHICK/SMP Director with approval from KDADS' SHICK/SMP Director.

Following is a sample list of possible grounds for dismissal. This list is for illustration purposes and is not intended to be complete or comprehensive:

- gross misconduct
- serious misjudgment that may undermine the SHICK/SMP's trust in the volunteer, cause harm to others, or diminish public trust in the SHICK/SMP
- insubordination including failure or unwillingness to perform essential role responsibilities and/or accept direction from authorized SHICK/SMP supervisory personnel
- being under the influence of alcohol or illegal drugs while on volunteer duty or representing the SHICK/SMP
- dishonesty, theft or other illegal acts
- loss of license (such as driver's license) or certification or qualification required to perform assigned duties
- unauthorized use or misuse of SHICK/SMP equipment or materials
- harm, abuse or mistreatment of beneficiaries, co-workers or other persons
- sexual harassment
- serious and repeated failure to abide by SHICK/SMP policies and procedures
- failure to meet physical, cognitive or emotional standards of performance
- repeated failure to satisfactorily perform assigned duties
- irresolvable conflict of interest
- serious breach of boundaries

3.69 Immediate dismissal

Policy: Some behaviors are so unacceptable that they are simply not tolerated at the SHICK/SMP program. Such behaviors trigger immediate dismissal of volunteers from all SHICK/SMP volunteer service. When there is sufficient information to indicate that the unacceptable behavior has taken place, the volunteer is immediately relieved of his or her duties.

The KDADS Medicare Grants Director establishes grounds for immediate dismissal. Individual situations vary and SHICK/SMP Coordinators and the KDADS Medicare Grants Director use discretion and good judgment in all decisions regarding possible volunteer dismissal.

If there is some question about the unacceptable behavior, the volunteer is immediately suspended from her or his volunteer role(s) until an investigation is complete with the KDADS Medicare Grants staff. The suspension is treated as a temporary dismissal, wherein the volunteer gathers his or her belongings, returns any SHICK/SMP identification and is escorted from the premises. In the case of a suspension pending investigation, when the investigation is complete the local SHICK/SMP Director will work with the KDADS'

SHICK/SMP Director to determine whether the volunteer will be reinstated, and if so, with what provisions, or dismissed.

Following is a sample list of possible grounds for immediate dismissal of SHICK/SMP volunteers. This list is for illustration purposes and is not intended to be complete or comprehensive:

- fraud, theft or abuse in connection with SHICK/SMP service
- serious illegal act
- gross negligence causing bodily harm in connection with SHICK/SMP volunteer service
- breach of confidentiality
- reporting for volunteer service in an impaired condition resulting from the use of alcohol or illegal drugs
- violence in the workplace

3.70 Notice of departure of volunteer

Policy: When a volunteer departs from the SHICK/SMP program, the volunteer shall notify their local SHICK/SMP Coordinator. The SHICK/SMP Coordinator in turn will notify KDADS Medicare Grants staff and any other affected person.

3.71 Reassignment of work and cessation of work relationships

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

Where a dismissed volunteer is in an ongoing relationship with a beneficiary, the SHICK/SMP Coordinator will make it clear to the beneficiary in writing that the volunteer is no longer a representative of SHICK/SMP, that the SHICK/SMP is neither monitoring nor responsible for any future actions of the volunteer, and the beneficiary is (are) cautioned to discontinue any SHICK/SMP -related contact with the volunteer.

3.72 Performance management review and appeals procedures

Policy: The SHICK/SMP has a corrective action review and appeals procedure in place. Volunteers are made aware of the appeals procedure upon acceptance into volunteer service. Decisions involving serious and formal corrective action, including dismissal of a volunteer, are reviewed for appropriateness by KDADS Medicare Grants staff in consultation with the local SHICK/SMP Director.

3.73 Grievance/complaint procedure

Policy: Volunteers with complaints or grievances with staff, other volunteers, beneficiaries or partner organizations communicate these to their SHICK/SMP Coordinator. If the complaint involves the volunteer's own SHICK/SMP Coordinator, the volunteer conveys the complaint to the next person in the chain of command, the KDADS Medicare Grants staff. All complaints will be treated as confidential. Every effort is made by the SHICK/SMP Coordinator/KDADS Medicare Grants staff to achieve speedy and effective resolution of the situation and the volunteer is kept informed of the progress of this effort. The final decision regarding resolution and related action rests with the local SHICK/SMP Director, with approval from KDADS' SHICK/SMP Director.

3.74 Investigation of outside complaints

Policy: The SHICK/SMP program has a process for investigating and resolving complaints from beneficiaries and other outside parties against volunteers. The KDADS Medicare Grants staff is obligated to follow up on these complaints and attempt to determine whether they have merit. A formal process will guide the response and ensure fairness and equitable application of the policy.

3.75 Resignation

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

3.76 Volunteers Aging in Place

Policy: The commitment of SHICK/SMP volunteers occasionally leads to volunteers who attempt to continue providing service even when their capacities have diminished to a point where quality of service and safety become issues.

To address this issue, each subgrantee shall establish a protocol for addressing the suitability of continued volunteer service. The following apply to a protocol for addressing suitability:

- The protocol shall ensure that the prior service of the volunteer is honored. The attempts of the volunteer to continue to provide service will be respected since the diminishing of their abilities is through no fault of their own.
- All attempts shall be made to find alternate methods for the volunteer to provide service to the subgrantee. These attempts may include changes in volunteer role, partnering with other volunteers or other enabling techniques.

- Volunteers will be encouraged to undertake their own self-assessment of capacity and to seek counsel from their own support network, such as family members and others who might provide objective information regarding continued volunteering.
- SHICK/SMP Coordinators should support the decision of volunteers to resign and shall indicate that this does not imply that the volunteers are letting the SHICK/SMP program down or failing to meet their commitment.

In situations where the volunteer has exhibited diminishing capacity that significantly affects their ability to perform volunteer service and where the volunteers does not choose to resign voluntarily the SHICK/SMP shall take unilateral action to initiate retirement of the volunteer and honor the service they have provided.

Volunteer Behavior, Performance and Roles

3.77 Clarification of meaning

Policy: It is the volunteer's responsibility to seek clarification about policies, as needed. Not understanding a policy is not acceptable grounds for failure to comply. Questions from volunteers regarding interpretation of policies should be addressed to the SHICK/SMP Coordinator for clarification, who will then consult with the KDADS Medicare Grants staff. Matters not specifically covered in these policies are determined by the SHICK/SMP Director.

3.78 Volunteer conduct

Policy: SHICK/SMP volunteers perform their duties in an objective, timely and conscientious manner. They at all times act in a knowledgeable manner, consistent with their training and these policies. SHICK/SMP volunteers are agents of the program. Volunteer presentation and performance reflect positively on the SHICK/SMP program, enhancing its integrity, reputation, and credibility. The SHICK/SMP Coordinator, KDADS Medicare Grants staff, and all other SHICK/SMP team members support appropriate volunteer conduct by ensuring that SHICK/SMP volunteers feel safe, prepared, supported and competent in the fulfillment of their responsibilities.

3.79 Boundaries and ethics

Policy: The SHICK/SMP clearly communicates role boundaries to volunteers. Volunteers recognize and respect the limits of their skills and abilities, and the boundaries and limitations of their role. If a volunteer is in doubt regarding the limitations of their role, no action is taken until direction on the matter is received from the SHICK/SMP Coordinator, KDADS Medicare Grants staff, or SHICK/SMP Director.

All volunteer roles have not only responsibilities, but limits to those responsibilities (i.e., boundaries). Boundaries are communicated through a range of mechanisms including, but

not limited to, role descriptions, performance standards, orientation, training, on-the-job training, ongoing training, volunteer supervision and support, performance evaluation, and, as needed, corrective action.

3.80 Provision of service

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

3.81 Representation of the SHICK and/or SMP program(s)

Policy: Volunteers are agents of the SHICK/SMP program while functioning in their assigned volunteer roles. Volunteers are not spokespersons for the SHICK/SMP program in any formal sense and do not represent themselves as such. Volunteers do not say anything or act in any way that might obligate the SHICK/SMP program or be construed as a formal SHICK/SMP role. This applies to all oral and written communications, including online statements in social media or other forums.

Prohibited actions in this regard include, but are not limited to:

- public statements that might in any way be construed as originating from or representing the SHICK/SMP
- statements to the press regarding anything pertaining to the SHICK/SMP or the volunteer's service with the SHICK/SMP
- lobbying efforts with other organizations, governments or other entities
- collaborations or joint initiatives not clearly authorized in advance by the SHICK/SMP
- any agreements, undertakings or contractual obligations on behalf of the SHICK/SMP
- online statements in social media or other forums that might be construed as officially representing the SHICK/SMP

3.82 Use of SHICK/SMP affiliation

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

Be aware that many volunteers may violate this policy unintentionally, believing that they are simply being helpful. This may occur, for example, when volunteers identify themselves in public as SHICK/SMP volunteers and then proceed to:

- give a personal opinion
- offer helpful suggestions having nothing to do with their SHICK/SMP role
- recommend a course of action that either violates the values of the SHICK/SMP or is clearly outside of the purview of the SHICK/SMP program.

3.83 Confidentiality

Policy: Volunteers are responsible for maintaining the confidentiality of all proprietary or privileged information to which they are exposed while serving as a volunteer, whether this information involves a member of staff, a volunteer, a beneficiary or other person, or involves the overall business of the SHICK/SMP program. Volunteers take all steps necessary to safeguard the confidentiality of all SHICK/SMP and beneficiary related information and to prevent personal information of beneficiaries from falling into the possession unauthorized persons.

Volunteers use any information collected or obtained in their course of their SHICK/SMP work only to assist the beneficiary or otherwise fulfill volunteer role responsibilities. No information collected or obtained in the course of SHICK/SMP work is disclosed other than when clearly approved by an authorized SHICK/SMP representative.

There is zero tolerance for breaches of confidentiality in connection with work at the SHICK/SMP. Even small breaches may cause harm to beneficiaries and/or to other persons and are subject to serious consequences up to and including dismissal. While volunteering for the SHICK/SMP, volunteers may become aware of private information about beneficiaries. This may be health/Medicare related or information of an otherwise personal nature.

Volunteers must sign a confidentiality agreement and remain in full compliance with the agreement as a condition of continued involvement in SHICK/SMP volunteer service. Volunteers are informed on this agreement that a breach of confidentiality is grounds for dismissal.

3.84 Dress code

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

3.85 Recording of volunteer time and activity

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

3.86 Absenteeism

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

3.87 Harassment

Policy: The SHICK/SMP program is committed to providing a safe and respectful work environment for all personnel and beneficiaries. No one has to put up with harassment for any reason, at any time. No one has the right to harass anyone else, at the SHICK/SMP workplace or in any situation related to SHICK/SMP programs and services.

The SHICK/SMP treats all complaints of harassment seriously, whether they are made informally or formally. Action is taken on all complaints to ensure that they are resolved quickly, confidentially, and fairly. Corrective action will be taken with anyone who has harassed a person or group of people.

All SHICK/SMP Coordinators have a responsibility to stop harassment. Everything is done to stop it as soon as it is detected, whether or not a complaint has been made. Appropriate corrective action and disciplinary measures are taken where harassment has occurred. Volunteers report to their SHICK/SMP Coordinator immediately if they are made to feel uncomfortable on the job through any behaviors or comments of beneficiaries, staff or other volunteers.

3.88 Drugs and alcohol

Policy: The SHICK/SMP program operates a work environment that is free of alcohol and drug use/abuse. This is a zero tolerance policy. Non-compliance is grounds for immediate dismissal.

The possession or consumption of alcohol or illicit drugs, or the misuse of prescription or "over the counter" drugs is prohibited on SHICK/SMP subgrantee premises or work sites, or in circumstances deemed by the KDADS Medicare Grants staff to present a serious risk to the interests of the SHICK/SMP program in terms of volunteer, paid staff, beneficiary or public safety, service quality, or the organization's reputation. Volunteers do not use, possess, transfer, distribute, manufacture, or sell alcohol or any illegal drug while on SHICK/SMP subgrantee property, while on duty, or while operating a vehicle on duty or while driving to or from a SHICK/SMP worksite or event.

Volunteers taking legal medication, whether or not prescribed by a licensed medical practitioner, that affects or impairs judgment, coordination or perception so as to adversely affect ability to perform work in a safe and productive manner, notifies their SHICK/SMP Coordinator prior to engaging in SHICK/SMP work.

When volunteers report impairments as a result of legal medication, the SHICK/SMP Coordinator determines whether the volunteer can remain at work or whether work restrictions are required. This may include consultation with a medical professional about the individual's ability to perform volunteer work as assigned.

3.89 Acceptance of gifts

Policy: SHICK/SMP volunteers shall not accept gifts from beneficiaries, their families, caregivers, or other representatives. Any such offerings are respectfully and tactfully declined, citing, as needed, this policy as the basis for their action. It is understandable that some SHICK/SMP clients and those who care for them wish to express their thankfulness through gifts to the people who have been so helpful; however, the SHICK/SMP provides services to beneficiaries without compensation. If a gift is received, the volunteer is required to turn in the gift to their SHICK/SMP Coordinator immediately.

Definition: For this policy, gift is broadly defined to include any payment, distribution, transfer, loan, advance, deposit, gift or other rendering of money, property, services or anything else of value, whether tangible or intangible. Gifts include but are not limited to material goods, money in any form, valuables, jewelry, wedding gifts, tickets to sporting events and entertainment, and travel. Meals provided during events are not considered gifts for the purposes of this policy.

3.90 Acceptance of honoraria

Policy: Honoraria offered to SHICK/SMP volunteers are respectfully and tactfully declined, citing, as needed, this policy as the basis for their action. Honoraria which are given to the SHICK/SMP program may be accepted by the volunteer on behalf of the SHICK/SMP program or subgrantee.

Definition: SHICK/SMP volunteers perform work functions (e.g., speeches, presentations, training, etc.) which may, from time to time, attract honoraria. Exempted from this policy are one-time speaker's gifts that can reasonably be regarded as small or token and where the nominal value received by any one person is under \$15.00.

3.91 Reimbursement of expenses

Policy: Volunteers may be eligible for reimbursement of reasonable expenses incurred while undertaking volunteer work for the SHICK/SMP program. Approval is received prior to any major expenditure. The SHICK/SMP Coordinator distributes information to all volunteers regarding specific reimbursable items and the process for receiving

reimbursement from the subgrantee. The SHICK/SMP program is not required to provide reimbursement for expenses.

3.92 Access to SHICK/SMP program property and materials

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

3.93 Relationships with beneficiaries

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

Invitations to SHICK/SMP volunteers from beneficiaries to spend personal time together or to engage in other than SHICK/SMP business are declined respectfully, citing, as needed, this policy as the basis for their action. Volunteers treat all beneficiaries with courtesy and respect. Volunteers respect the personal boundaries of beneficiaries and govern their physical behaviors accordingly.

3.94 Financial transactions with clients

Policy: SHICK/SMP volunteers do not enter into financial transactions with beneficiaries, their family members, or caregivers, either lending or borrowing in either direction.

If clients are in immediate financial need, the SHICK/SMP Coordinator is notified and referral is made to appropriate community services.

3.95 Political issues

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

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

3.96 Cultural sensitivity

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

The SHICK/SMP program must be, and must be perceived to be, a respectful member of the communities it serves. This requires volunteers to be knowledgeable regarding different cultures and to strive at all times to show respect for these cultures.

3.97 Labor actions

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

Retention and Recognition

3.98 Recognition

Policy: The SHICK/SMP subgrantee has a system for recognizing and rewarding the work done by volunteers, both individually and collectively. Subgrantees may choose to recognize and reward volunteers based on criteria, timing and process. The recognition system is broadly constructed so as to allow recognition of all forms of volunteer contribution and achievement, not just the quantity of volunteer time donated. Staff and volunteers are consulted to identify those deserving of any special recognition or awards.

3.99 Informal recognition

Policy: Paid staff and volunteers responsible for volunteer supervision provide recognition of volunteer service on a regular and frequent day-to-day basis.

Definition: Methods of informal recognition range from simple "Thank You's" to a concerted effort to include volunteers as full participants in decision-making and implementation of volunteer projects and activities.

3.100 Feedback on results

Policy: Whenever possible, volunteers are provided feedback on the results of their work, including data on volunteer contributions that allow the SHICK/SMP program to meet its service goals.

Volunteer/Paid Staff Relationships

3.101 Volunteer-paid staff relationships

Policy: Volunteers and paid staff are partners in implementing the mission and goals of the SHICK/SMP program, with each having an equal but complementary role to play. Each partner understands and respects the needs and abilities of the other. Paid staff do not make unreasonable demands on volunteers or request that volunteers exceed the boundaries of the role description or the limits of their individual capacity. These concepts should be firmly communicated in orientation sessions for new staff and volunteers.

3.102 Identifying paid staff responsibility for volunteer management in role descriptions

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

3.103 Responsibilities of SHICK/SMP Coordinators

Policy: SHICK/SMP Coordinators supervise volunteers and provide oversight similar to that provided to paid employees. SHICK/SMP Coordinators are responsible for day-to-day management and guidance of volunteers' work and are available to volunteer for consultation and assistance.

3.104 Volunteer management training for members of staff

Policy: An orientation to working with volunteers is provided to all paid staff at the SHICK/SMP program. More in-depth in-service training on effective volunteer management is provided to paid staff that work closely with and/or directly supervise SHICK/SMP volunteers.

Section 4.0: Information Technology

4.1 Information procedures

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

Volunteers are trained in this protocol, including data collection, entry, transport, protection and disposal. Reasonable accommodations are made for volunteers with disabilities.

4.2 Internet protocol

Policy: The subgrantee has a protocol for use of the Internet, covering e-mail use, appropriate access to web sites.

The subgrantee has a protocol for appropriate training for volunteers who use wireless devices to connect to the Internet while performing SHICK/SMP work.

The subgrantee has a protocol and appropriate training for volunteers who make use of their personal computers while performing SHICK/SMP work.

Reasons for establishing an Internet protocol are to:

- Raise awareness among volunteers and paid staff of their roles in protecting the privacy of SHICK/SMP clients through appropriate use of the Internet.
- Prevent identity theft that can result from information security breaches through the use of spyware and hacking.
- Prevent breaches that could expose the organization to fines for violating state privacy protection laws or to lawsuits for failure to properly safeguard protected information.

4.3 Reporting stolen or lost consumer information

Policy: If data is misplaced or stolen, volunteers immediately notify their SHICK/SMP Coordinator so that appropriate notification can be made to affected beneficiaries and authorities, and future safeguards are instituted as appropriate.

4.4 SHICK/SMP reporting software use

Policy: All of the information security policies related to general computer and internet use also apply to SHICK/SHIP and SMP national data reporting software use. ACL requires the

SHICK/SMP program to report performance data into the SHIP and SMP national data reporting systems. The SHIP and SMP data reporting systems contain sensitive personal identifying information and protected personal and health information that must be protected. Volunteers who report into the ACL system are given their own user account and do not share these with other SHICK/SMP staff or volunteers. When any volunteer with a user account leaves the SHICK/SMP, their user account is immediately disabled by the KDADS Medicare Grants staff.

4.5 Use of social media by volunteers

Policy: Social media should be used responsibly by volunteers. The same principles and policies that apply to volunteer behavior in any volunteer role also apply to all activities online. Failure to utilize social media appropriately can lead to disciplinary action. The following guidelines apply to all volunteer use of social media:

- Be transparent. Always identify yourself and your role with SHICK/SMP. Remember to state that your views do not represent those of SHICK/SMP unless you have obtained specific approval.
- Be respectful and considerate of others. Do not post disparaging or defamatory statements about SHICK/SMP or other organizations, staff, volunteers, beneficiaries or other parties.
- Be honest and accurate and avoid spreading rumors based on lack of information.
- Don't reveal confidential information about SHICK/SMP or beneficiaries.
- Never discuss online any identifiable details on a current or past case or beneficiary.
- Separate any social media communications related to SHICK/SMP from your own personal social media communications. Set up separate accounts for discussions of your SHICK/SMP activity and your personal and family social media interactions.
- If you are concerned about the appropriateness of any statement or online activity discuss it first with your SHICK/SMP Coordinator.
- If you see content in social media that reflects poorly on SHICK/SMP please report it to your SHICK/SMP Coordinator.

Useful Abbreviations and Acronyms

KDADS

Kansas Department for Aging and Disability Services

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.

AAA

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

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.

SHIP

The State Health Insurance Assistance Program (SHIP) is an HHS-funded network of state-based programs that provide one-on-one counseling to people with Medicare and their caregivers. All 50 states and four territories have a SHIP. SHICK is Kansas' SHIP.

STARS

The SHIP Tracking and Reporting System (STARS) is the online national reporting system that SHICK uses to report client contacts, public education, and outreach activities.

SIRS

The SMP Information and Reporting System (SIRS) is the online national reporting system that SMP uses to report client contacts, public education, and outreach activities.

Definitions of Terms

Harassment

Harassment is any behavior that demeans, humiliates, or embarrasses a person, and that a reasonable person should have known would be unwelcome. It includes actions (e.g. touching, pushing), comments (e.g. jokes, name-calling), or displays (e.g. posters, cartoons). It may be a single incident or continue over time. Harassment is also a breach of human rights on protected grounds such as race, religion, color, national origin, gender, gender identity, sexual orientation ancestry, mental or physical disability, medical condition, disability, political activity, marital status, or age.

Disrespectful behavior, also known as "personal" harassment, is prohibited at the SHICK/SMP. While it also involves unwelcome behavior that demeans or embarrasses someone, the behavior is not based on one of the prohibited grounds named above.

Abuse of authority, also prohibited at the SHICK/SMP, occurs when a person uses authority unreasonably to interfere with a person or their work. It includes humiliation, intimidation, threats, and coercion. It does not include normal managerial activities, such as counseling, performance evaluation, and discipline, as long as these are not being done in a discriminatory manner.

Human rights

Human rights are considered inherent to all human beings, and generally include the following areas: race, religion, color, national origin, gender, gender identity, sexual orientation ancestry, mental or physical disability, medical condition, disability, political activity, marital status, age, privacy, rights of the accused, freedom of expression, and more.

In-kind staff

Employees of other organizations who perform SHICK/SMP-connected work as part of their own ongoing paid work responsibilities – often referred to as "in-kind staff" – are not considered SHICK/SMP volunteers for the purposes of these policies because they do not work under the control (but are considered partners) of the SHICK/SMP. The hours contributed by these employees may be recorded in the SMP/SHIP national data reporting system.

Other community workers who receive stipends for their service (such as VISTA, AmeriCorps, Senior Companions, SCSEP and others) are also considered in-kind staff for the purposes of these policies, not volunteers. The hours and activities of these community workers may be recorded in the SHICK/SMP national data reporting system.

Positions of trust

A position of trust involves access to at least one of:

- beneficiaries or other vulnerable people, such as family members
- personal or confidential information
- money or other valuables

Examples of volunteer roles that are likely to be positions of trust include:

- Administrative support aide
- Call center operator
- Complex interactions specialist
- Counselor
- Exhibitor
- Local coordinator
- Presenter
- Team lead
- Trainer

Any other volunteer roles may also, or from time to time, be considered positions of trust as responsibilities change or where the conditions under which the work is done require it. For example, any volunteer roles in which home visits occur would also qualify as a position of trust. Volunteer roles may also qualify as positions of trust due to the nature of the client.

Positions of trust are subject to significantly more rigorous screening inquiries.

SHICK/SMP duties

SHICK/SMP duties can include one-on-one counseling, presentations to the public, data entry, program reporting, program outreach, and other activities as detailed in Section 1.4 Volunteer Role Classifications.

Social media

Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with SHICK/SMP, as well as any other form of electronic communication.

Subgrantee

A "subgrantee" is any third-party organization engaged in recruiting and/or managing volunteers performing SHICK/SMP duties. Subgrantees may be formally contracted to deliver SHICK/SMP programs or may be doing so through informal partnership arrangements with the SHICK/SMP.

KDADS is responsible for ensuring that subgrantees comply with all relevant policies governing the management and engagement of volunteers performing SHICK/SMP duties through or under the auspices of subgrantees.

Volunteer

A "volunteer" is anyone who, without coercion or compensation or expectation of compensation beyond reimbursement of reasonable and previously approved expenses incurred in the course of his or her volunteer duties, performs a task at the direction of and on behalf of the SHICK/SMP.

A "volunteer" is one who is officially accepted and enrolled by the SHICK/SMP prior to performance of any task.

Unless specifically stated, volunteers are not considered "employees" of the SHICK/SMP.

Employees of other organizations who perform "in-kind" SHICK/SMP work are not considered volunteers under these policies.