

2022

# Accident Prevention Plan



## Mission

To provide care and support to people in their homes and communities



## Vision

To help people live the life they want



## Values

Respect, Integrity, Service, Excellence

Safety

Consumer Direct Care

1/1/2022

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## **SAFETY STATEMENT**

Safety is an important part of our workplace and the daily activities within our organization. Safety is everyone's responsibility. Consumer Direct Care Network ("CDCN") and its associated companies recognize their responsibility to provide a safe working environment for their employees, to the extent possible. In return, CDCN expects each employee to recognize their obligation to conduct themselves with regard not only for their safety but for the safety of their Clients and co-workers.

Accident prevention is the primary goal of any safety program. Reducing the loss of earnings and physical injuries suffered by employees because of accidents is also important. These goals justify a constant and intensive accident prevention program.

Full cooperation of management and all employees is essential to successfully achieve the goals of the Safety Program.

### **PURPOSE**

All employees and are covered by and are expected to comply with this policy. This manual is meant as a guideline to ensure all workers have the knowledge, training, and resources available to perform their work by the State, OSHA, and Company safety standards. We expect and require all employees to understand and follow the State and OSHA safety standards as it applies to their work, as well as Company policies, rules, and procedures that are provided to all workers and disseminated periodically as needed.

We are confident that much will be accomplished in preventing and/or reducing injuries to personnel and damage to equipment and property by this safety undertaking.

Our employees' health and welfare are of paramount concern, and we are committed to providing a safe and healthful work environment for all employees. The Company's goal is to instill an attitude within each employee to think safe, work safe, and be considerate of co-workers in the workplace. Accidents most often lead to personal suffering and damaging effects on one's home life and loved ones, as well as disruptions, delays, and additional expenses for all concerned.

### **SCOPE**

All CDCN employees.

### **RESPONSIBILITIES**

Responsibilities for safety and health include the establishment and maintenance of an effective communication system between workers and management. To this end, all personnel are responsible for assuring that their messages are received and understood by the intended receiver.

Specific safety and health responsibilities for company personnel are as follows:

## Managers

Active participation in and support of safety and health programs is essential. Management officials will display their interest in safety and health matters at every opportunity. Each manager will establish realistic goals for injury reduction in his/her area of responsibility and will establish the necessary implementing instructions for meeting the goals. Goals and implementing instructions shall be within the framework established by this document. Incentives will be included as a part of implementing instructions.

## Supervisors /Client / Authorized Representative (Supervisors)

The safety and health of the employees they supervise are the primary responsibility of the supervisors. At CDCN, the Supervisor role is accomplished in several ways. For administrative staff a traditional supervisor structure is in place. For caregivers, in States which CDCN operates in a Co-Employment model the Client or Authorized rep operates as the supervisor. To accomplish this obligation, supervisors will:

1. Assure that all safety and health rules, regulations, policies, and procedures are understood with all workers and reviewing rules as the job or conditions change or when individual workers show a specific need.
2. Require the proper care and use of all needed protective equipment.
3. Receive and take initial action on employee suggestions, or disciplinary measures.
4. Promote employee participation in the safety and health program.

## Employees

1. Follow all job safety rules which apply to their specific task assignments.
2. Report hazardous conditions to their supervisor.
3. Attend and take an active part in safety trainings and / or meetings.
4. Report all accidents immediately.

## **SAFETY DISCIPLINARY POLICY**

CDCN believes that a safety and health accident prevention program is unenforceable without some type of disciplinary policy. Our company believes that to maintain a safe and healthy workplace that the employees must be cognizant and aware of all company, State, and Federal safety and health regulations as they apply to the specific job duties required. The following disciplinary policy is in effect and will be applied to all safety or health violations.

The following steps will be followed unless in the unlikely event that the seriousness of the violation would dictate going directly to Step 2 or Step 3.

1. A first-time violation will addressed result in a Documented Verbal warning as soon as possible after the incident.
2. A second-time offense will a First Written warning and a copy of this written documentation entered the employee's personnel folder.



3. A third-time violation will result in a Final Written warning or termination, depending upon the seriousness of the violation.

### **HOME OFFICE SAFETY**

CDCN recognizes that many of its employees work out of a home office. For this reason, we expect those employees to follow all standards for creating and maintaining a safe home work environment. Each employee who performs their job from their home, either some or all of the time, is given a Home Safety Checklist to assess the following risk areas. If any risks are identified, it is the employee's responsibility to correct it with the help of Risk Management or the Safety Department and the guidelines and expectations set forth in this document.

- General Safety
- Fire Safety
- Electrical Safety
- Office Ergonomics

### **PERSONAL PROTECTIVE EQUIPMENT**

CDCN believes we must provide a hazard-free environment to our employees. Each employee encountering hazardous conditions must be protected against the potential hazards. The purpose of Personal Protective Equipment (PPE) is to shield or isolate individuals from hazards that may be present in the workplace. However, PPE devices are not to be relied on as the only means to protect against hazards. Rather, PPE devices are used in conjunction with other feasible control measures and sound work practices. If possible, hazards will be abated first through engineering and administrative controls, with PPE to protect against hazards that cannot reasonably be abated otherwise.

Establishing an overall written PPE Program detailing what PPE employees use in which work areas documents our PPE efforts and makes it easier to ensure that they use PPE properly in the workplace. If, after reading this program, you find that improvements can be made, please contact the Safety Manager. We encourage all suggestions because we are committed to the success of our PPE Program. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company. Workers covered in a CBA may have their need and availability for PPE defined by the CBA.

#### **ADMINISTRATIVE DUTIES**

The Safety Manager is the PPE Program Coordinator, who has overall responsibility for the program. The Safety Manager will designate appropriate supervisors to assist in training each employee and monitoring employee use of PPE.

#### **HAZARD ASSESSMENT**

To assess the need for PPE, the following steps are taken:

- The Safety Manager, with other appropriate employees, identifies job classifications where exposures occur or could occur. The Safety Manager or designee examines the following records to identify and rank jobs according to exposure hazards:
  - Injury/illness records
  - First aid logs
- The Safety Manager surveys workplace areas where hazards exist or may exist to identify sources of hazards to employees. This person considers these basic hazard categories:
  - Motion or impact
  - Extreme temperatures
  - Chemical or biological
  - Employee falls and falling/dropped objects
  - Sharp objects
  - Lifting, carrying load limits
  - Electrical
- An estimate of the potential for injuries is then made for each hazard. Each of the basic hazards is reviewed and a determination is made as to the injury type and the severity, probability, and overall risk of each potential injury for each hazard found. The existence of any situations where multiple exposures occur or could occur is considered.
- The Safety Manager documents the hazard assessment via a written certification that identifies:
  - The workplace evaluated,
  - The person certifying that the evaluation has been performed,
  - The date(s) of the hazard assessment, and that the document is a certification of hazard assessment

### **PPE SELECTION GUIDELINES**

Once any hazards have been identified and evaluated through hazard assessment, the general procedure for selecting protective equipment is to:

- Become familiar with the potential hazards, the type of PPE that are available, and what they can do.
- Compare types of PPE to:
  - The hazards,
  - The work conditions,
  - The work environment (including seasonal weather changes),
  - The jobs impacted.
- Review any PPE performance information from suppliers so that we know if the PPE meets OSHA requirements.

- Select the PPE that meets selection requirements found in the OSHA regulations and ensures a level of protection equal to or greater than the minimum required to protect employees from hazards. Outside consultation, manufacturers' assistance, and other recognized authorities may be consulted if there is any doubt regarding proper selection.
- Fit the user with proper, comfortable, well-fitting protection and instruct each employee on the care and use of the PPE. The users must be aware of all warning labels and the limitations of their PPE.

It is the responsibility of the Safety Manager to reassess the workplace hazard situation as necessary, to identify and evaluate new equipment and processes, review injury and illness records, and reevaluate the suitability of previously selected PPE. This reassessment will take place as needed, but at least annually.

#### **PPE PROVISION AND PAYMENT**

Where PPE is required by OSHA regulations or by the company, it will be provided to each employee required to use that PPE. The PPE is provided at no cost to each employee unless provided by the exceptions listed in the OSHA regulations. PPE acquisition and distribution varies by state and position.

The most thorough PPE program will not be effective if employees do not wear PPE, or if they wear the equipment, they do not do so appropriately. The only way to ensure that each of our employees is aware of the purpose of wearing PPE and how the equipment is to be worn is to train each employee.

The Safety Manager and/or supervisor provide training for each employee who is required to use PPE. Training includes:

- What PPE is necessary
- How to put on, take off, adjust, and wear assigned PPE.
- Limitations of PPE; and
- The proper care, maintenance, useful life, and disposal of assigned PPE.

Our information and training are provided to each employee in a manner that the employee understands. In turn, each employee must demonstrate an understanding of the training and the ability to use the PPE properly before he or she is allowed to perform work requiring the use of the equipment.

Employees are prohibited from performing work without donning appropriate PPE to protect them from the hazards they will encounter in the course of that work.

Because failure to comply with company policy concerning PPE can result in employee injury or illness, an employee who does not comply with this PPE Program will be disciplined for noncompliance according to the disciplinary process.

**CLEANING AND MAINTENANCE**

It is important that all PPE be kept clean and properly maintained by the employee to whom it is assigned. PPE is to be inspected, cleaned, and maintained by employees at regular intervals as part of their normal job duties so that the PPE provides the requisite protection. Supervisors are responsible for ensuring compliance with cleaning responsibilities by employees.

**EXPOSURE CONTROL PLAN**

CDCN is committed to providing a safe and healthful work environment for our entire staff and employees. In pursuit of this goal, the following Exposure Control Plan (“ECP”) is provided to eliminate or minimize occupational exposure to bloodborne pathogens by OSHA standard 29 CFR 1910.1030 “Occupational Exposure to Bloodborne Pathogens.”

The ECP is a key document to assist the Company in implementing and ensuring compliance with the standard, thereby identifying employees who are potentially at risk for occupational exposure to blood or other infectious materials and therefore at risk for exposure to HIV and HBV.

Employees covered by the bloodborne pathogens standard receive an explanation of this ECP during their initial training session. The standard will also be reviewed in their annual refresher training. All employees have an opportunity to review this Plan at any time during their work shifts by contacting the Safety Department. If requested, the employee will be provided with a copy of the ECP free of charge, within 15 days of request.

The Safety Department is responsible for reviewing and updating the ECP annually or more frequently, if necessary, to reflect any new or modified tasks and procedures which affect occupational exposure and to reflect new or revised employee positions with occupational exposure. Approval of the ECP is given by a Company Officer.

**PROGRAM ADMINISTRATION**

The Safety Department is responsible for the implementation of the ECP. The Risk Management Department will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures.

Those employees who are determined to have occupational exposure to blood or other potentially infectious materials (“OPIM”) must comply with the procedures and work practices outlined in this ECP.

Where applicable, local CDCN offices assist Clients with obtaining all necessary personal protective equipment (“PPE”), engineering controls (e.g., sharps containers), labels, and red bags as required by the Standard and applicable to home health care. The Risk Management Department is responsible for maintaining appropriate employee health and OSHA records.

Local CDCN offices are responsible for assisting Clients with training, including providing written training summaries and related documents to Clients and employees, OSHA, and NIOSH representatives when requested.

**EXPOSURE DETERMINATION**

OSHA requires employers to perform an exposure determination concerning which employees may incur occupational exposure to blood or other potentially infectious materials. The exposure determination is made without regard to the use of PPE (i.e., employees are exposed even if they wear PPE.) This exposure determination is required to list all job classifications in which all employees may be expected to incur such occupational exposure, regardless of frequency. For CDCN, the following job classifications are in this category.

- Caregiver/Individual Provider
- Nurse (RN/LPN)
- Service Coordinator
- Field Coordinator
- Training Coordinator

In addition, OSHA requires a listing of job classifications in which some employees may have occupational exposure. Since not all the employees in these categories would be expected to incur exposure to blood or other potentially infectious materials, tasks or procedures that would cause these employees to have occupational exposure are also required to be listed to clearly understand which employees in these categories are considered to have occupational exposure.

The job classifications and associated tasks for these categories are as follows:

**Job Classifications in which *all* employees have Occupational Exposure:**

- Any positions that involve exposure to blood and other potentially infectious materials.

**Job Classifications in which there is *little* Chance of Exposure:**

- Office staff
- Administrative personnel

**Tasks and Procedures in Which Occupational Exposure May Occur:**

- Handling of blood, blood products or body fluids, or contaminated objects
- Invasive procedures
- Care of newborns, infants, and children
- Care of phlebotomy or vascular access procedures
- Contact with laboratory or pathological specimens
- Wound care
- Contact with mucous membranes or non-intact skin
- Handling or disposal of medical waste
- Cleaning or processing of contaminated equipment
- CPR
- Handling of soiled linen
- Cleaning or decontamination of environmental surfaces

- Contact with used sharps

**STANDARD PRECAUTIONS**

All employees will utilize standard precautions.

**ENGINEERING CONTROLS AND WORK PRACTICES**

Engineering controls and work practices controls are used to prevent or minimize exposure to bloodborne pathogens.

Employees are prohibited from eating, drinking, smoking, applying makeup, or handling contact lenses in work areas where there is a reasonable likelihood of occupational exposure. Food and drink should not be stored in refrigerators, freezers, shelves, cabinets, or on countertops where blood or other potentially infectious materials are present.

Needles, razor blades, broken glass & other contaminated “sharps” must be placed directly in a puncture-resistant sharps container at the point of use. Gloves must always be worn when handling sharps.

The Company identifies the need for changes in engineering controls and work practices through review of records, maintaining incident logs, and analyzing trends by Safety Committee activity.

**HEPATITIS B VACCINATION**

Hepatitis B vaccine is available to all employees (who have risk of occupational exposure) unless the employee has previously received the complete Hepatitis B vaccination series, antibody testing has revealed that the employee is immune, or the vaccine is contraindicated for medical reasons.

The Hepatitis B vaccination series is available at no cost after training and upon hire. The employee can choose if they would like to receive the Hepatitis B series. Vaccinations will be arranged by the safety coordinator for the contract locations.

Employees who decline to accept Hepatitis B vaccination must also sign a consent form. This does not prohibit the employee from choosing to receive the vaccine later nor shall it adversely impact their job assignment.

Employees will receive counseling from a health care provider on the Hepatitis B vaccine, including information on efficacy, safety, method of administration, and the benefits and side effects of being vaccinated.

**NEEDLE STICKS**

Needle sticks will follow the post-exposure protocol. All needle stick exposures must be reported to the Injury Hotline immediately at 877-532-8542.

**POST-EXPOSURE PROTOCOL**

Should an exposure incident occur, employees must inform their supervisor or Case Manager and call the confidential Injury Hotline immediately at 877-532-8542.

Following an exposure incident, all employees shall receive a confidential medical evaluation and follow-up that includes these elements:

- Documentation of the route(s) of exposure and the circumstances under which the exposure occurred.
- A description of the employee's duties as they relate to the incident.
- Identification and documentation of the source individual, when known. Arrangements will be made, and consent obtained from the source individual to be tested as soon as possible to determine HIV, HCV, and HBV infectivity; with documentation that the source individual's test results were conveyed to the employee's health care provider. If the source individual is already known to be HIV, HCV, and/or HBV positive, new testing need not be performed.
- Assure that the exposed employee is provided with the source individual's test results and with information about applicable disclosure laws and regulations concerning the identity and infectious status of the source individual (e.g., laws protecting confidentiality).
- After obtaining consent, collect the exposed employee's blood as soon as feasible after the exposure incident, and test blood for HBV and HIV serological status.
- If the employee does not give consent for HIV serological testing during the collection of blood for baseline testing, preserve the baseline blood sample for at least 90 days; if the exposed employee elects to have the baseline sample tested during this waiting period, perform testing as soon as feasible.
- The employee's relevant medical records and vaccination dates shall be made available to the healthcare provider evaluating the employee.

Results of the source individual's testing, if known, shall be made available to the exposed employee and the employee shall be informed of applicable laws and regulations concerning disclosure of the identity and infectious status of the source individual.

A written report of this medical evaluation should be provided to the employee within fifteen (15) days of exposure. This report is limited to:

- The employee is informed of the results of the evaluation.
- The employee is told of any medical conditions resulting from exposure to blood or other potentially infectious materials which require further evaluation or treatment.

All other findings or diagnoses will remain confidential and will not be included in the written report.

#### **PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT**

The Safety Department will review the circumstances of all exposure incidents to determine:

- Engineering controls in place at the time
- Work practices followed
- A description of the device being used

- Protective equipment or clothing that was used at the time of the exposure incident (gloves, eye shields, etc.)
- Location of the incident
- The procedure being performed when the incident occurred
- Employee training

The Safety and Risk Management Department records all percutaneous injuries from contaminated sharps in the Sharps Injury Log.

If it is determined that revisions need to be made, the Safety Department will ensure that appropriate changes are made to this ECP. (Changes may include an evaluation of safer devices, adding employees to the exposure determination list, etc.).

### **EMPLOYEE TRAINING**

Employees covered by the bloodborne pathogens standard receive an explanation of this ECP during their initial training session. The bloodborne pathogens standard is also reviewed at the employee's annual refresher training.

All employees who have occupational exposure to bloodborne pathogens receive training on the epidemiology, symptoms, and transmission of bloodborne pathogen diseases. In addition, the training program covers, at a minimum, the following elements:

- An explanation of the ECP and how to obtain a copy.
- An explanation of methods to recognize tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident.
- An explanation of the use and limitations of engineering controls, work practices, and PPE.
- An explanation of the types, use, location, removal, handling decontamination, and disposal of PPE.
- An explanation of the basis for PPE selection.
- The opportunity to receive counseling from a healthcare provider on the hepatitis B vaccine, including information on efficacy, safety, method of administration, the benefits and side effects of being vaccinated, and that the vaccine will be offered free of charge.
- Information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM.
- An explanation of the procedure to follow if an exposure incident occurs including the method of reporting the incident and the medical follow-up that the employer is required to provide for the employee following an exposure incident.
- An explanation of the signs and labels and/or color coding required by the standard and used at the Client's home.
- An opportunity for interactive questions and answers with the person conducting the training session.



**RECORDKEEPING**

Training records are completed for each employee upon completion of initial training. Bloodborne Pathogens training is conducted annually. Records are kept with the employee's personnel file.

Training records include:

- The dates of the training session
- The contents or a summary of the training session
- The names and qualifications of persons conducting the training
- The names and job titles of all persons attending the training sessions.

Employee training records are provided upon request to the employee or the employee's authorized representative within 15 working days. Such requests should be addressed to the Risk Management Department.

**MEDICAL RECORDS**

Medical records are maintained for each employee with occupational exposure by 29 CFR 1910.1020 "Access to Employee Exposure and Medical Records."

The Safety Department is responsible for the maintenance of the required medical records. These confidential records are kept in the Risk Management Department for at least the duration of the employment.

Employee medical records are provided upon request of the employee or to anyone having written consent of the employee within 15 working days. Such requests should be sent to the Safety Department.

**OSHA RECORDKEEPING**

An exposure incident is evaluated to determine if the case meets OSHA's Recordkeeping Requirements (29 CFR 1904). This determination and the recording activities are done by the Safety and Risk Management Departments.

**Sharps Post Incident Protocol and Injury Log**

In addition to the §1904 Recordkeeping Requirements, all percutaneous injuries from contaminated sharps are also recorded in the Sharps Injury Log. All incidents must include at least:

- The date of injury.
- The type and brand of the device involved.
- The department or work areas where the incident occurred.
- An explanation of how the incident occurred.

CDCN maintains State-specific Sharps Injury Logs where required by State law.

## **FIRST-AID PROGRAM**

CDCN is dedicated to the protection of its employees from on-the-job injuries and illnesses. However, when injuries or illnesses do occur, we are prepared to immediately respond to the needs of the injured or ill.

This First-Aid Program ensures that our company meets OSHA's requirements at §1910.151, *Medical Services and First Aid*.

### **ADMINISTRATIVE DUTIES**

The Safety Manager, our First-Aid Program administrator, is responsible for establishing and implementing the First-Aid Program. This person has full authority to make necessary decisions to ensure the success of the program.

### **DESIGNATED FIRST-AID PERSONNEL**

We follow the *National EMS Education and Practice Blueprint*, which lists the following first-aid designations:

- First-aid provider: Occupationally required to be trained in first aid even though they may not be specifically obligated by law to perform first aid; responds as a "Good Samaritan"; uses a limited amount of equipment to perform an initial assessment and provide immediate life support and care while awaiting the arrival of emergency medical services (EMS).
- First responder: Uses a limited amount of equipment to perform initial assessment and intervention and is trained to assist other EMS.
- Emergency Medical Technician (EMT)-Basic: The 2nd level of professional emergency medical care provider. Qualified to function as the minimum staff for an ambulance.
- EMT-Intermediate: The 3rd level of professional emergency medical care provider. Can perform essential advanced techniques and administer a limited number of medications.
- Paramedic: The 4th level of professional emergency medical care provider. Can administer additional interventions and medications.

A list of CDCN personnel who are trained and responsible to render first aid is kept at each local office.

### **HAZARD AND MEDICAL SERVICES ASSESSMENT**

The Safety Manager or designee has assessed the location for hazards to determine whether any pose the risk of a life-threatening or permanently disabling injury or illness.

### **FIRST-AID SUPPLIES AND EQUIPMENT**

Our first-aid supplies and equipment must meet the specific needs of our company's operations and hazard risks.

The Safety Manager or designee is responsible for ensuring that adequate first-aid supplies are readily available.

The Safety Manager or designee is responsible for ensuring the first-aid supplies are adequate. Supplies are replaced promptly when expended. In addition to first-aid supplies, our first-aid program includes CPR training.

#### **POSTING**

To help those responding to a medical emergency, we have posted signs directing personnel to emergency equipment and supplies. The sign, message and location vary by office and need.

#### **TRAINING**

Training is the heart of our First-Aid Program. Employees must not attempt to rescue or treat an injured or ill employee unless they are trained and qualified to do so. They are trained to contact a designated qualified individual.

Employees who are trained and qualified to render first aid have completed the American Heart Association first-aid training program. The Safety Manager or designee is responsible for conducting annual training.

#### **RECORDKEEPING**

The Safety Manager is responsible for maintaining records relating to CDCN's first aid, injury, illness, and accidents cases.

#### **PROGRAM EVALUATION**

The Safety Manager ensures that our First-Aid Program is effective by thoroughly evaluating and revising the program as necessary. Program evaluation is performed annually.

## **RESPIRATORY PROTECTION PLAN**

The purpose of this program plan is to ensure adequate protection from respiratory hazards and to ensure compliance with applicable Federal and State standards. Respirators are only to be worn as an interim control until feasible engineering and/or administrative controls can be implemented unless it has been demonstrated that such controls are not feasible. Compliance with the requirements of this policy is a condition of employment and will be strictly enforced under the referenced disciplinary procedure.

#### **RESPONSIBILITIES**

Management and supervisors who are responsible for respirator wearers will be held accountable for the implementation and enforcement of their aspects of the program. The Safety Manager or their designee will be the Respiratory Program Administrator (RPA). The RPA has the authority and responsibility to implement and revise the Program as necessary.

#### **It is management's responsibility to:**

- Determine what specific settings or procedures require the use of respiratory protection devices.

- Identify and provide appropriate respirators to meet the needs of each specific application.
- Provide training and instructions for the use of respiratory protection devices in a language and manner the employee can comprehend.
- Designate supervisors as responsible for ensuring that all personnel are completely knowledgeable of the respiratory protection requirements for the areas in which they work. Supervisors are responsible for ensuring that their subordinates comply with all facets of the respiratory protection program.

**It is the employee's responsibility to:**

- Be aware of the respiratory protection requirements for their work area as explained by management.
- Wear appropriate respiratory protection equipment according to proper use instructions that have been provided.
- Follow the instructions to be medically cleared and fit tested before wearing N-95 masks.

**DUTIES OF THE RESPIRATORY PROGRAM ADMINISTRATOR (RPA)**

The RPA has specific duties in assuring proper implementation of the Respiratory Protection Plan and continued compliance with the overall Program. The RPA has sufficient knowledge and experience with OSHA and other consensus standards to carry out their duties. The RPA will keep abreast of new developments in respirator use and technology to ensure the ongoing adequacy of the Program.

Specific responsibilities will include but not be limited to:

- Selection and Purchase
- Instruction and Training
- Fit Testing and Issuing Respirators
- Cleaning and Maintenance
- Inspection
- Program Evaluation
- Random checks
- Record Maintenance
- Standard Operating Procedures/Program Modification

**RECOMMENDATIONS**

For persons who must share air space with suspected or confirmed infectious tuberculosis and COVID -19 patients, the Centers for Disease Control (CDC) states that Particulate Respirators may be indicated in the following situations:

- When appropriate ventilation is not available, the patient's signs and symptoms suggest a high potential for infectiousness.

- When the patient is potentially infectious and is undergoing a procedure that is likely to produce bursts of aerosolized infectious particles or to result in copious coughing or sputum production, regardless of whether appropriate ventilation is in place.
- When the patient is potentially infectious, has a productive cough, and is unable or unwilling to cover coughs.

**SELECTION**

Respirators are used for protection against certain airborne particles in a size range of 0.1 to >10.0 microns. All respirators used by the Company will meet the applicable CDC guidelines for TB exposure control and COVID-19 exposure.

**USE OF APPROVED RESPIRATORS**

All Nurses, Therapists, Aides, and Companions shall wear an approved respirator throughout their work shifts, when necessary.

The approved assembly shall be worn as issued. Only Company-issued, approved respirators shall be used. No employee shall alter or change any part of the issued respirator assembly.

**PURCHASING**

Respirator purchasing shall be coordinated through the safety department.

**INVENTORY CONTROL INCLUDING ISSUING**

The Safety Department, by Company policy, shall be responsible for inventory control and issuing of all approved respirators.

**MEDICAL CLEARANCE**

Everyone who is fitted with an N-95 respirator will first be required to complete a Respirator Medical Evaluation to determine their ability to use a respirator before they are fit tested or required to use a respirator. This will be evaluated by appropriate medical personnel and arranged by the Safety Department.

**FIT TESTING**

The respirator-to-face seal must be tested before the employee enters a hazardous environment. Fit testing must be conducted for each type of respirator used and conducted if a condition occurs which may change the way the respirator fits, for example, significant weight change. Fit testing must be conducted according to the instructions included with a Qualitative Fit Test Kit and documentation made regarding the pass or fail of the fittest. Fit testing will be performed before initial assignment or use. The protocols for fit testing include the saccharin qualitative fit test. Testing will be arranged by the safety department.

**CLEANING AND DISINFECTION**

An employee will be issued a respirator when medically necessary. They will be responsible for inspecting it and for maintenance, as needed.

**LENGTH OF USE**

- Particulate respirators should be inspected before each use, and if any damage or deterioration is detected they should be replaced. In addition, respirators should be replaced if they become difficult to breathe through or contaminated with blood or body fluids.
- 3M particulate respirators are considered disposable products and cannot be cleaned. However, particulate respirators do not necessarily need to be replaced after a single use.
- Before using the respirator, the face piece, and head strap should be checked for any signs of damage or deterioration. Any damage or deterioration noted indicates the respirator should be discarded and replaced.
- When not in use the respirator should be stored in a plastic bag labeled with the name of the wearer. It is important not to write on the respirator itself, as this constitutes damage and may impact the product's filtration efficiency. Each respirator should only be used by one individual and should not be shared. It is not appropriate to fold the respirator and place it in a pocket, or to manipulate the respirator to an abnormal shape or position which may impair the respirator's function. Respirators should be stored in a convenient, clean, and easily accessible location when not in use.

**INSPECTION**

All respirators shall be inspected by the wearer immediately before and after each use to ensure adequate protection. The inspection shall include as a minimum the following items:

- Appropriate NIOSH approval numbers on filters (N-95)
- Elasticity, cracks, tears, holes, or other distortions would diminish the effectiveness of the facepiece.
- Ensure cleanliness of the respirators.

If the respirator fails to pass any of the inspection criteria, the respirator shall be immediately removed from use.

**STORAGE**

At the end of use, each employee shall store his/her respirator in the re-sealable plastic bag.

**TRAINING**

Effective training will be given to all employees required to use respirators. The elements of the respirator training program include the following:

- Tuberculosis and all other airborne diseases: Education will be provided regarding the disease process, methods of transmission and treatment, risks associated with treatment, and the employee risk of contracting the disease.
- Respirator Use: Each employee shall be instructed in the correct use of the particulate respirator including proper instructions for use (donning and removal) along with the procedure to perform a proper fit check.

- The employee shall also be instructed regarding the limitations of the particulate respirator in preventing the transmission of airborne disease.

#### **WORKPLACE SURVEILLANCE**

The Respiratory Protection Program will be evaluated annually by the Safety Manager to ensure that the employees are following company procedures and that the program is operable and viable.

#### **FACIAL HAIR POLICY**

To obtain an adequate fit when using a particulate respirator, the sealing area of the respirator must come in direct contact with the skin. Any condition which interferes with direct contact with the skin may compromise the fit of the respirator.

Qualitative saccharin fit testing is used to demonstrate satisfactory facial fit. To follow OSHA standards, fit testing must be passed by all workers requiring respiratory protection.

**Fit testing will not be conducted on employees with facial hair that extends under the respirator sealing area. An alternate method of protection will be provided in these instances.**

### **SAFE DRIVING PROGRAM**

CDCN and its affiliated companies have committed to safety, service, and quality for both their employees and Clients. Equally, employees assigned the privilege of driving a Company-owned or leased/rented vehicle, as well as employees using personal vehicles during Company business, have the professional obligation of operating said vehicles by Federal, State, and local laws, codes, and regulations.

Further, every Company employee has the moral responsibility to exercise safe conduct and common courtesy toward the public, motorists, and pedestrians, in the operation of a vehicle during Company business.

#### **DEFINITIONS**

Company 'business' or 'business purpose' is defined as any activity performed with the main intent to transact Company business, where business is the primary purpose for undertaking travel, as opposed to any personal purpose.

An employee is considered a Regular Driver if driving is required as part of their job, or if they regularly drive once a month or more for business purposes.

Business Related Driving is the travel between two business destinations on behalf of the Company. Examples include, but are not limited to, travel between one company office location and another, travel from the company office to a store to pick up job-related supplies, and travel from one Client's home to another Client's home.

**DRIVER AUTHORIZATION, TRAINING, AND MONITORING**

It is a Company policy and requirement for employment, that every administrative employment position with driving duties requires a motor vehicle record ("MVR") meeting the grading requirements stated below. This MVR policy applies both to drivers of Company-owned and leased/rented vehicles, as well as employees using personal vehicles during Company business.

**SCREENING PROCESS**

MVRs will be initiated by the Human Resources Department (or local office for Agency-Based Traditional direct care workers) as part of the employment background screening process and reviewed at the start of employment, and at least annually thereafter. A job offer extended to an employee-candidate for a position with driving duties shall be contingent upon an MVR meeting the required standards; continued employment in a position with driving duties also requires an MVR meeting the standards outlined below.

**DRIVER TRAINING**

The Company will require all authorized drivers to complete Safe Driving Training.

**STANDARDS FOR MOTOR VEHICLE RECORDS**

1. All vehicle operators must have a valid driver's license.
2. No new administrative worker will be hired with driving as a responsibility (or allowed a job change) with a "poor" MVR. MVRs will be graded based on the table below, as minimum requirements.
3. Driving records must remain "acceptable" or "clear," as graded on the table below, for continued employment in positions with driving duties.

Any exceptions to these guidelines will be referred to senior management for approval, in writing.

**MOTOR VEHICLE RECORD SCREENING**

The Company shall request MVRs periodically, for every employee who has driving duties and privileges. The purpose of this screening is to ensure that all designated drivers who operate a motor vehicle for Company business, maintain a "clean" driving record. The Company will cover all costs associated with obtaining the MVR.

A Review Committee, composed of the Human Resources Director and the Human Resources Manager will review all MVRs that do not have an 'acceptable' or 'clear' grade.

A clean driving record is defined as a driving record that would qualify an applicant for employment at the Company (i.e., clear, or acceptable). If an MVR is not clean, the Company reserves the right to place the employee on probation for some time, and/or revoke driving duties until the employee's motor vehicle record qualifies as clean, and/or terminate the employee if job duties require driving. Upon request by the employee, the employee shall receive a copy of their MVR after each MVR review. The Company will comply with the adverse action process required



by the FCRA (Fair Credit Reporting Act).

**Motor Vehicle Record Grading Criteria: (Last 3 Years)**

Number of <b>Minor</b> Violations	Number of At-Fault Accidents			
	0	1	2	3
0	Clear	Acceptable	Borderline	Poor
1	Acceptable	Acceptable	Borderline	Poor
2	Acceptable	Borderline	Poor	Poor
3	Borderline	Poor	Poor	Poor
4	Poor	Poor	Poor	Poor
<b>Major</b> Violations				
1 or more	Poor	Poor	Poor	Poor

"Clear" MVR - no points or violations.

"Acceptable" MVR - one at-fault accident in the last three years and less than two violations, or zero at-fault accidents and one or two violations.

"Borderline" MVR - zero at-fault accidents and three violations, or one at-fault accident and two or fewer violations, or two at-fault accidents in the last three years and less than two violations.

"Poor" MVR - one or more major violations, or, zero at-fault accident and four or more violations, or, one at-fault accident and three or more violations, or, two at-fault accidents and two or more violations, or three or more at-fault accidents in the last three years.

"At-Fault Accident" - Any accident where the driver is cited with a violation, or negligently contributes to the incident, or any single-vehicle accident where the cause is not equipment related.

Major Violations – one or more constitutes a Poor MVR

- Driving under the influence of alcohol or drugs or driving while otherwise impaired.
- Failure to stop/report an accident.
- Reckless or careless driving.
- Making a false accident report.
- Homicide, manslaughter, or assault arising out of the use of a vehicle.
- Driving while license is suspended or revoked.
- Attempting to elude a police officer.

Minor Violations

- Any moving violation other than a Major.

**COMPANY-OWNED & LEASED VEHICLES**

The Company owns and leases several automobiles. Leased vehicles are considered part of the vehicle fleet for purposes of these policies and procedures. This fleet is operated to enable the Company to better serve its customers. Company vehicles may be assigned to an individual, a department, or an office, depending upon the Company's needs.

**AUTHORIZED DRIVERS**

Only authorized employees can operate the Company's fleet of vehicles. In all instances, Company vehicles are for Company business only. Persons other than Company owners or employees (e.g., spouses, dependents, etc.) are not permitted to operate Company vehicles unless expressly permitted to do so, in writing, by an Officer of the Company.

When authorized in writing by an Officer of the Company, Company-owned vehicles may be used by employees for commuting to and from work, but if done, the individual will incur a tax liability that will be reported to the IRS as taxable imputed income. The current value of this benefit is maintained by the Accounting Department. No tax liability will be incurred if a Company-owned vehicle is occasionally driven to an employee's home after a long trip or driven to an employee's home after work if the employee needs to leave early the next morning on business.

Otherwise, no personal use of a Company vehicle is allowed by any employee unless specifically authorized in writing by an Officer of the Company.

**MAINTENANCE**

We appreciate employee support in keeping our Company vehicles in top condition. All drivers of Company vehicles bear some responsibility for the care of Company-owned vehicles, and should always check the following:

- Inspect the vehicle for unreported damage - broken windows, rock chips, scrapes, crunched bumpers, etc.
- Inspect the tires for proper inflation and sufficient tread.
- Is the vehicle overdue for an oil change?
- Does the vehicle make any funny noises or appear to need any mechanical repair (engine, transmission, tire balance, alignment, brakes, etc.)?
- Is the vehicle clean inside?
- Is the wiper fluid empty?
- Is the fuel tank empty or very low?
- Additional "Rules for Company Cars" are kept in each Company-owned vehicle and are included at the end of this chapter.

If the vehicle is unsafe, do not use it. Any problems should be reported to a supervisor immediately.

Manufacturers' recommended intervals for oil changes, filters, lubrication, tune-ups, etc. should

always be followed. Tires should be replaced when necessary, and where appropriate, studded snow tires should be mounted & removed as conditions mandate.

The Company has established procedures for recording Company vehicle maintenance. A Vehicle Maintenance Form will be kept in each Company-owned vehicle. This form should be reviewed periodically by the responsible Program Manager to ensure services are performed as required.

#### **INSURANCE**

All employees of the Company, who are authorized to use their vehicles during Company business, must carry adequate liability insurance coverage on their vehicle of at least \$300,000 combined single limit or \$100,000 per person/\$300,000 per occurrence liability insurance or the minimum required by the State. Failure to carry adequate liability insurance coverage may be cause for disciplinary action, up to and including termination.

#### **ALCOHOL/DRUGS**

Employees are not allowed to operate vehicles while under the influence of alcohol/drugs, or while impaired by alcohol/drugs. "Under the influence" or "while impaired" means that an employee is adversely affected by alcohol or a drug, or the combination thereof. The symptoms of influence and/or impairment are not confined to those consistent with misbehavior or too obvious impairment of physical or mental ability such as slurred speech or difficulty in maintaining balance. An employee will be presumed to be impaired and in violation of this Policy whenever the presence of drugs or alcohol exists at levels that would equal or exceed those levels as prescribed by the appropriate State or Federal law, whichever is more stringent, for driving under the influence or driving while impaired. The Company may impose drug testing, as appropriate.

**Drivers must be physically and mentally able to drive safely!**

#### **FOLLOW THE LAW**

Company employees are always instructed to obey all traffic regulations. Vehicle drivers who incur traffic, parking, or related driving citations are responsible for paying their fine(s); all moving and non-moving violations are the employee's responsibility.

#### **CELL PHONES**

It is against Company policy for anyone to drive on Company time in their personal, rental, or Company vehicle and use a cell phone in a non-hands free capacity. If an employee receives a call, text, or email while driving, and the phone is not tethered with the car they must safely pull over the vehicle before acting. If a call is missed, the driver must safely pull over before checking their voice mail.

#### **SEAT BELTS**

Motor vehicle accidents are the number one cause of on-the-job deaths. To reduce driving risk, Company employees are required to use vehicle-equipped restraining devices (any/all seat belts and shoulder straps) while driving any motor vehicle.

This will help to:

- Disperse the force of a collision.
- Keep you inside the car.
- Keep you conscious.
- Help keep you in control.
- Prevent major injuries.

### **ACCIDENTS**

Accidents may occur that involve Company employees and Company-owned vehicles. The Company considers these accidents unfortunate since our employees' health is at risk and the Company's assets are compromised.

In the event an employee is involved in a motor vehicle accident, the employee should adhere to the following procedures.

The employee shall comply with all local laws governing such accidents, including providing proper car insurance information to others involved in the accident.

1. If a Client's car is involved in the accident, the Client's car insurance and employee's driver's license will be provided. The Client will be encouraged to notify their insurance agent.
2. If an employee's car is involved in the accident, the employee's car insurance and driver's license will be provided. The employee will be advised to notify their insurance agent.
3. If a Company-owned car is involved in the accident, the Company's car insurance and the employee's driver's license will be provided.
4. If a rental car is involved in an accident, notify the Company Risk Manager as soon as possible.

If not seriously injured, the employee shall document the accident in writing with the date, time, location, and brief description of the accident, and gather names, phone numbers, and insurance information from the other driver(s). The Employee will report it immediately and not more than 24 hours following the accident to the Fleet department at either [fleetsafety@consumerdirectcare.com](mailto:fleetsafety@consumerdirectcare.com) or phone 877-532-8542 Option 6.

All accidents are to be reported to the Safety and Risk Manager as soon as reasonably possible, with written notification to follow within twenty-four (24) hours after the accident occurs.

The Risk Manager shall report the accident immediately to the Company's auto insurance representative and the appropriate Manager or Director. A copy of the findings shall become a permanent record in the affected employee's personnel file.

Each motor vehicle accident shall be reviewed by the Review Committee. The Safety Manager, employee's manager, or those involved in reviewing the accident, will determine whether the

employee involved in the accident shall retain their Company-related driving privileges, and/or, whether any other disciplinary action will be taken.

The results of each investigation shall be formally documented and communicated to the employee involved in that accident, and that employee's supervisor, if appropriate. A copy of the results will be placed in the employee's personnel file.

#### **REVOCACTION OF DRIVING PRIVILEGES**

The Company may revoke driving privileges, seek full reimbursement, and/or terminate an employee because of gross or willful negligence by the employee entrusted with the care, custody, and control of a vehicle while on Company time. Gross or willful negligence will have occurred in the following events:

- Driving under the influence of alcohol or drugs.
- Homicide or manslaughter involving the use of a motor vehicle.
- Operating a Company vehicle without a valid driver's license.
- Leaving the scene of an accident (hit and run).
- Misrepresenting the facts concerning an accident.
- Reckless or careless driving.
- Operating a Company vehicle in an unsafe condition, while having prior notice of such condition.
- Causing damage to a third party arising from the driver's gross or willful negligence.
- Company vehicle used for any purpose in violation of Federal, State, or local laws.
- Operating a vehicle without proper authorization.

#### **PERSONAL USE OF COMPANY VEHICLES**

Several of our employees are provided with Company-owned or leased vehicles for business needs. In many cases, these vehicles are in the employee's control around the clock. All employees driving on behalf of the Company are always required to operate the vehicles safely and legally. This includes any person or business use activity.

Supervisory personnel are to discuss and review these rules with all authorized drivers. In addition, all newly hired personnel authorized to drive as part of their duties must acknowledge receipt of this policy before being approved to drive a Company vehicle.

#### Rules for Personal Use of Company Vehicles

1. Only Company employees who have been pre-qualified to operate vehicles for the Company are authorized to drive Company-owned vehicles for personal needs. The ONLY exception to this is when injury and/or death is imminent, and others must operate the vehicle in an emergency.
2. Personal use of Company vehicles should be kept to a minimum. Company vehicles will not be used for vacation trips or other extended non-business trips unless specific prior

approval has been granted.

3. A Company vehicle being used for personal activity shall be operated by the Company's established rules of operation for business activity.
4. All fines, defense costs, and other legal penalties arising out of ticketed offenses are the responsibility of the driver.
5. Approval to operate a Company-owned vehicle for personal use can only be given by an Officer of the Company.

## VIOLENCE PREVENTION PLAN

CDCN and its associated companies strive to maintain a safe workplace for every employee, whether they work in a homecare or office environment. This Policy addresses the Company's concern for the personal physical safety of all employees.

The Company has a **zero-tolerance policy** toward any form of workplace-related violence and abuse, which includes verbal harassment, intimidation, and psychological, emotional, and physical abuse. Complaints of abuse are promptly and thoroughly investigated, and offenders are subject to serious disciplinary action, including termination. All acts of criminal violence in the workplace will be vigorously prosecuted.

### OBJECTIVE

The goal of this Policy is to minimize the likelihood of harmful incidents in the workplace, assist employees in recognizing potential threats to their safety, and provide response mechanisms should an incident of violence occur.

### SCOPE

This Policy applies, without exception, to management, employees, contracted workers/services, and volunteers.

### **Violent and abusive acts fall into three main categories:**

1. Physical conduct, e.g., unwanted touching, hitting, threatening gestures, throwing of objects, and physical and sexual assault. (Sexual assault also includes "hands-off" offenses like exhibitionism, voyeurism, and harassment.)
2. Verbal conduct, e.g., offensive, hostile, abusive, intimidating, and/or threatening language.
3. Psychological control, e.g., statements that are shaming, blaming, degrading, and over-controlling which result in an employee's fear of loss of job, and/or decrease in esteem.

### OFFICE SAFETY PROCEDURES

1. Each office must establish a codeword or phrase as a means of communicating with co-workers that a situation is unsafe, and assistance is needed.

2. All visitors must check in with the receptionist. The receptionist will let staff know that they have a visitor. If the visitor is unknown, agitated, or upset, staff will greet them in the reception area.
3. If the visitor is agitated, staff will attempt to calm them by empathizing with their feelings. If unable to calm the visitor, staff will politely ask the visitor to leave, saying: "You seem angry. Let's talk about this at another time." If the visitor refuses to leave, staff will call a coworker and/or use the code word to alert the office that there is a potential problem. If another staff person is unavailable, and the visitor is exhibiting threatening behavior, the police should be called. It is helpful to give an excuse to leave the room/area and then call for help.
4. Try to keep a desk or chair between yourself and an agitated visitor.
5. Co-workers should always maintain vigilance in the workplace. If you notice a worker is with an agitated Client, it helps to maintain proximity to the co-worker.
6. If you are the last person at work, lock all doors. If you are working with someone after hours and are leaving, let your co-worker know they are alone.

### **HOME VISIT SAFETY**

Some of the Clients served, may, at times, have trouble directly expressing emotion and managing behavior, which increases employee risk of being harmed. All administrative staff is trained with basic de-escalation techniques as a means of preventing verbal and physical aggression. The best strategy is to plan carefully when conducting home visits and be prepared for the unexpected.

1. All administrative employees will check-in and out of the office and leave information about the location of their visit. An expected time of return should also be indicated. If your supervisor or the administrative assistant notices you have not returned, they may call you on your cell phone.
2. All administrative employees will take their cell phones with them when on a home visit. (It is not good practice to give your cell phone or home phone to Clients. They may call you at inopportune times or about inappropriate issues.)

### **Before the First Visit**

1. Gather as much information as possible about the individual or family before the visit.
2. Get clear, specific directions to the home. Keep directions to the home in the chart so others/staff can locate the home if needed.
3. Discuss any safety concerns with your supervisor before going to the home (including drugs, guns, and aggression).
4. Leave detailed information about the visit with a designated person in the office, including, name, address, phone number, time of the visit, and expected time of return.
5. If concerned, conduct the first visit with another staff person.
6. Check in at the office when the visit is completed.

7. Detail any safety concerns in the chart. If concerns exist, note a plan of action with your supervisor and communicate a plan to other staff before they enter the home.

**Traveling to the Site**

1. Keep valuables out of sight. It is best not to bring them at all.
2. Wear comfortable clothing and shoes that give you movement. In the winter months make sure you have warm clothing, i.e., boots, gloves, and a hat.
3. Keep the gas tank in your or the company car half full. Also travel with an emergency kit (provided in company cars).
4. If it is dark, park in well-lit areas whenever possible and lock the car doors.
5. DO NOT get out of the car if you do not feel safe.
6. Carry as little as possible into the home.
7. Leave the home at any time if you DO NOT FEEL SAFE.
8. When returning to the car, have the key ready and check the front and back seats and floor before you get in.
9. If you get a flat tire, drive carefully to a well-lit area before you change it. Call the office and let someone know your situation and where you are.
10. If you have car trouble and you are in a remote area, put the hazard lights on. Use flares if you have them and tie a white cloth to the antenna. Stay inside the care, with the doors locked. If someone stops to help, DO NOT get out of the car. Instead, roll down the window slightly and let them know if you need them to call the police.
11. DO NOT assist a stranger during work time whose car has broken down. Instead, help the person by using your cell phone and calling the police.
12. If you are being followed, DO NOT drive home. Instead, drive to the nearest police station and honk your horn. If that is not possible, drive to an open gas station or other business where you can safely leave the car. Honk the horn if it is not safe to get out. Try to get a description and license plate number of the car following you.

**During the Visit**

1. Keep a direct path to the door. Position yourself by the door so you can exit quickly, if possible.
2. Only be in the person's bedroom if necessary.
3. Always respect the individual's personal space. When touching the individual, explain what you are doing and why. It is best to ask permission before touching, if possible, to communicate respect for boundaries.
4. If a Client threatens harm:
  - Stay calm and listen attentively. Avoid sudden movements.
  - Maintain eye contact and personal space.



- Reflect the Client's feelings, i.e., frustration or anger.
- Give the Client a few minutes to calm down and then problem solves what needs to occur.

5. If someone is threatening you with a weapon:

- Stay calm and listen attentively. Avoid sudden movements.
- Keep the person talking. Follow the instructions of the person who has the weapon.
- Negotiate. Try to get "yes's" from the person with the weapon. For example, start with a basic request like, "Is it okay to move a few steps back?"
- The more space you can create between yourself and the person who has the weapon, the better. Weapons are less accurate from a distance.
- DO NOT try to grab the weapon.
- Watch for a possible time to escape. Look for concealment.
- The more time that passes the better. The chance of injury decreases with time.
- Call the police as soon as possible.

Any incidence of aggression or safety that occurs should be immediately reported to your supervisor. An Incident Report must also be completed and forwarded to your supervisor. In any dangerous situation, your safety is of the utmost importance. A Client can only be helped if your safety is maintained.

### **TRAINING**

The Violence Prevention plan will be communicated to all new employees during orientation and included in the Employee Packets for field workers. Office staff will receive periodic 'refresher' training.

## **EMERGENCY ACTION PLAN**

### **PURPOSE**

There is work being performed by numerous personnel at any given time at Company offices, facilities, and other properties all over the state. No one knows when or if a medical, environmental, or other unforeseen emergency is going to occur.

The purpose of this Emergency Action Plan (EAP) is to establish an organized effort to protect personnel and/or the public from injury and minimize property and environmental damage in the case of an emergency.

Each office location has an emergency response and evacuation plan that is disseminated, reviewed, and practiced annually. The plan includes the posting of the emergency procedures throughout each location. Telephone numbers are posted so that emergency response personnel can be notified, rapidly enter the location, and have immediate access to all locations and personnel.

In the event of an emergency, the Supervisor or designated representative shall immediately take control of the accident scene. For all life-threatening situations, a supervisor will be responsible to call 911 and relay all pertinent information. For non-emergencies, requiring more than onsite first-aid, the designated hospital/clinic may be contacted.

#### **EMERGENCY MEDICAL RESPONSE**

Call 911

Whenever emergency response personnel are dispatched to a company facility, the following procedures will be immediately put into operation:

- The Supervisor or designated personnel will secure the scene of the accident.
- A Company representative will be dispatched to the door or entry point to guide emergency vehicles to the closest access point.

#### **EVACUATION PLAN**

In the event of a fire, explosion, earthquake, or other emergencies that would require the evacuation of all personnel from the facility, the following procedures shall be put into operation:

If necessary, the Supervisor or designated personnel will notify all personnel as to the nature of the emergency and start evacuating the area. Personnel in the company facilities shall start evacuating immediately. Proceed to the designated assembling point, contact the Supervisor or person in charge to “check in” and give all pertinent information. Do not leave the designated area until further notice.

The supervisor or the designated personnel will contact the appropriate personnel and relay the information.

Once assembled in the designated assembled area, each Supervisor shall conduct a headcount of the employees in their respective departments. Roll call will be taken, and the Roll call sheet turned into Safety following evacuations. No one leaves this area until given the all-clear to do so.

#### **Management**

Ensure that all employees are familiar with reporting procedures, emergency exits, and staging areas wherever they are working.

- Know the location and use of all safety equipment.
- Keep employees from re-entering an evacuated area until emergency crews and/or Company officials have evaluated the area.
- Assure only those individuals trained in first aid/CPR assist with injured.

#### **Employees**

- Follow procedures in this written plan and other Company policies
- If you are involved in the incident or were in the emergency, inform your supervisor of any other hazards associated with the area, or any other information that would be helpful.

- Assist the emergency response personnel with any requests that might improve the situation.

**DO NOT RE-ENTER EVACUATED AREAS UNTIL EMERGENCY PERSONNEL AND/OR COMPANY OFFICIALS HAVE EVALUATED THEM.**

### **EARTHQUAKE**

Earthquakes range in intensity and length and are known to be a reoccurring natural disaster. Most injuries and deaths are a result of falling objects, not the shaking itself. The following outlines steps to take before and during an earthquake:

If inside, establish sturdy furniture, worktables, or doorways, which will be used in the case of earthquakes. If these are not available, move into a corner and protect the head and neck in any way possible.

- Stay inside if already there.
- Stay near the center of the building, away from glass windows, skylights, and doors.
- Do not run through or near rooms where there is a danger of falling debris.
- If outside, stay in the open, away from buildings and utility wires.
- Place head between bent knees whenever possible.
- Maintain this position until reasonably sure the earthquake is over.
- Remove incapacitated employees to the outside staging area.
- Move to the outside staging area.
- Report accounted for to your supervisor.
- Remain at the outside staging area until it is deemed safe by Company officials to re-enter.

**DO NOT LEAVE THE STAGING AREA UNTIL THE ALL-CLEAR HAS BEEN GIVEN**

When the shaking ceases, employees should exit buildings immediately through the nearest exits. Competent officials should check utilities. If water pipes are damaged or electrical wires have shorted, turn them off at the primary control point. If a gas leakage is detected, shut off the main valve, open windows, and keep the building cleared until utility or authorized officials deem it safe.

### **BOMB THREAT**

Experience shows that over 95% of all written or telephoned bomb threats are hoaxes. However, below outlines steps for appropriate actions to be taken.

The employees receiving the phone call should get as much information about the group or person making the threat, and the size and location of the bomb:

- Immediately report the threat to Management.
- Management should call 911 and report all details about the threat.

- Follow instructions from officials about evacuation.
- Explain the nature of business and ask them to assess which processes and machinery should be shut down.
- If evacuation is suggested, report immediately to the outside staging area to be accounted for.
- If public and/or Company officials determine a different staging area is required, report to this staging area.
- If a suspicious-looking object is found and considered to possibly be a bomb, call your supervisor and they will call 911 and evacuate the area.

### **ACTIVE SHOOTER**

In the case of an active shooter, all employees shall secure and lock all entrance and exit points and remain in the locked facility until officials arrive. Under no circumstance will employees talk to the media or attempt to intervene during an active shooter crisis.

### **THEFT/UNAUTHORIZED ENTRY**

Employees who discover or become aware of a theft or an unauthorized entry or suspicious behavior at or near the facility shall report it to their Supervisor immediately and will be expected to cooperate during the investigation process. The Supervisor will notify the Safety Manager who will be performing the investigation: interview all witnesses (documenting information), ensure extensive photo documentation is performed, complete the report of the damage, and request copies of any reports completed by local law enforcement.

### **SEVERE WEATHER-WINTER STORMS**

Company facilities may be subject to severe winter storms, which can bring heavy snow, ice, strong winds, and freezing rain, as well as road closings, structural damage, and power outages. Facilities located in areas that expect severe winter storms should:

- Be aware of changing weather conditions and should have procedures in place for the early release of employees. They should also be prepared to shelter employees who become stranded at the site.
- Following the emergency, they should repair any damage and remove snow and ice from parking lots, roads, and walkways.

### **SEVERE WEATHER-FLOODS**

Floods are among the most widespread natural disasters and many areas can experience some degree of flooding after the winter snow melts, spring rains, or heavy thunderstorms. Most floods develop slowly over days, but flash floods, which can be caused by intense storms, can develop in minutes. Flood response procedures should address several concerns. These include:

- The facility will monitor for flood watches and warnings.
- The Facility will coordinate with its community's emergency plan.
- Personnel will know community evacuation routes and where to find higher ground.
- Warning and evacuation procedures

- When the floodwaters recede, damages should be assessed and repaired.

### **SEVERE WEATHER – THUNDER & LIGHTNING STRIKES**

Advanced planning is the single most important means to achieving lightning safety. The following steps are suggested:

- In the event of a forecast for thunderstorms and especially severe storms, the weather forecast should be monitored throughout the day.
- If severe weather is imminent, outdoor operations should be ceased or at least conducted near safe assembly areas such as fully enclosed metal vehicles with windows up or substantial and permanent buildings.
- If lightning or thunderstorms are observed and are less than 4.8 km (3 miles away) (15 seconds between flash and thunder, make sure everyone is indoors away from windows.

Also---**AVOID** trees, **AVOID** water, **AVOID** open fields, **AVOID** using the (hard wired) telephone and headsets.

### **SUSPICIOUS MAIL**

Measures that can be taken without installing special detection equipment are the same for most biological threats and are organized according to whether the mail is opened or unopened and whether it contains a written threat or an unidentified container:

#### **Opened mail that is leaking a suspicious liquid or powder, or mail that has a suspicious odor:**

If you open a letter or package and see an unknown material, or if an unknown material is leaking from the mail as a liquid, powder, or odor, *do not try to clean it up or otherwise disturb it*. Set the mail down on a stable surface and call 911 the first responder designated to respond to this type of threat, e.g., the HAZMAT team at the local fire and rescue department.

**Opened mail that contains a written threat:** If anyone in the organization opens a letter or package *with or without powder* and discovers a written threat, such as a note that says, “You have been contaminated with ricin,” put the package or letter down on a stable surface and call the first responder designated to deal with this type of threat. The mail center supervisor or the first responder must ensure that local law enforcement authorities and the FBI local field office are notified of either of these events.

**Unopened mail:** Whenever an employee identifies an unopened package or letter as “suspicious”, a mail center supervisor or specially trained employee should examine the mail piece to confirm that it meets the “suspicious” criteria established for the location (e.g., it is covered with powder or appears saturated from the inside). If confirmed, *do not open it*. A supervisor or designated mail center worker who is trained to confirm the identification must be available during all working hours.

Next, determine if the mail is addressed to a person who works in the facility. If so, and if the addressee can be found in a reasonable period, contact the addressee, and ask him or her to identify the package. If the addressee recognizes the package and is certain it is not threatening,

deliver it. If the addressee does not recognize the package, or if you cannot locate the addressee, attempt to contact the individual listed on the return address to verify the contents of the package. If you successfully contact the sender of the package, ask them to provide a description of the contents, the intended addressee, and the reason it was mailed to your location. Provide this information to the addressee for further verification.

If the addressee does not recognize the package, or if you cannot locate the addressee, *do not open it.*

### **PARKING LOT SAFETY**

Being aware of your surroundings is always good, especially when going to and from your vehicle. Please be aware and follow some of the simple suggestions below.

- Park near your building in a highly visible and well-lit area.
- Use the main building entrance — avoid rear or secluded exits.
- Keep your valuables, including purses and recent purchases, out of sight. Always lock them in the trunk if you must leave them in the car.
- Do not use more than one parking spot as it may anger another person.
- Do not park next to large vans, trucks, or other vehicles as they will block your sight.
- Do not have a personal identification tag on your key ring. If your keys are lost or stolen, a thief will be able to find your car or house.
- Do not approach someone if they are loitering near your vehicle. Walk to a safe place such as a lighted store, house, or building. Call the police. ...
- Your keys to unlock the vehicle.
- Your keys or card key to unlock building doors.
- A whistle or other personal alarm.
- Try to go out in pairs from work if it is dark

Please notify your supervisor if you don't feel comfortable walking to your vehicle and someone will escort you. If there is a threat or you feel in imminent danger, please call 911.

## **FIRE PREVENTION PLAN**

OSHA's Fire Prevention Plan regulation, found at §1910.39, requires our company to have a written Fire Prevention Plan (FPP). This plan applies to all operations in our company where employees may encounter a fire.

This Fire Prevention Plan (FPP) is in place at CDCN to control and reduce the possibility of fire and to specify the type of equipment to use in case of fire. This plan addresses the following issues:

- Major workplace fire hazards and proper handling and storage procedures for hazardous materials.
- Potential ignition sources and their control.

- The type of fire protection equipment necessary to control each major hazard.
- Procedures to control accumulations of flammable and combustible waste materials.
- Procedures for regular maintenance of safeguards installed on heat-producing equipment to prevent the accidental ignition of combustible materials.
- The name or job title of employees responsible for the control of fuel source hazards.

Under this plan, our employees will be informed of the plan's purpose, preferred means of reporting fires and other emergencies, types of evacuations to be used in various emergencies, and the alarm system. The plan is closely tied to our Emergency Action Plan where procedures are described for emergency evacuation procedures and exit route assignments, procedures to account for all employees after emergency evacuation has been completed, and rescue and medical duties for those employees who perform them. Please see the Emergency Action Plan for this information.

The Safety Manager is the Plan Coordinator and has overall responsibility for the plan. The onsite coordinator is designated by the Safety Manager. The written plan is kept on the Y drive and will be reviewed and updated annually.

The FPP communicates to employees, policies, and procedures to follow in a fire emergency. This written plan is available, on request, to employees, their designated representatives, and OSHA officials.

#### **PLAN COORDINATOR RESPONSIBILITIES**

At CDCN, the Plan Coordinator is responsible for the following activities:

- Develop a written Fire Prevention Plan for regular and after-hours work conditions.
- Integrate the FPP with the existing general emergency plan covering the building occupied.
- Distribute procedures for reporting a fire, the location of fire exits, and exit routes to each employee.
- Conduct drills to acquaint the employees with fire procedures, and to judge their effectiveness.
- Satisfy all local fire codes and regulations as specified.
- Train designated employees in the use of fire extinguishers and the application of medical first-aid techniques.

If evacuation is deemed necessary, the Onsite Coordinator ensures that:

- All employees are notified and evacuated, and a headcount is taken to confirm the total evacuation of all employees.
- When practical, equipment is placed and locked in storage rooms or desks for protection.
- The building owner/superintendent is contacted, informed of the action taken, and asked to assist in coordinating security protection.

- In locations where the building owner/superintendent is not available, security measures to protect employee records and property are arranged as necessary.

**FIRE HAZARDS**

Flammable or combustible materials and other fuel sources may not ignite on their own without an external source of ignition. The following procedures are used to control known ignition sources at CDCN: ???

**FIRE PROTECTION EQUIPMENT**

Fire protection equipment used at CDCN is selected and purchased by the Facility manager.

**HOUSEKEEPING PROCEDURES**

Our company controls accumulations of flammable and combustible waste materials and residues so that they do not contribute to a fire. We have identified the following potential hazards in our facility: garbage cans, microwaves, and toasters.

The following procedures have been developed to eliminate or minimize the risk of fire due to improperly stored or disposed of materials: garbage cans need to be dumped daily, and all food heating or cooling equipment needs to be always attended to.

**FIRE PREVENTION PLAN TRAINING**

At the time of a fire, employees should know what type of evacuation is necessary and what their role is in carrying out the plan. In cases where the fire is large, total, and immediate evacuation of all employees is necessary. In smaller fires, a partial evacuation of nonessential employees with a delayed evacuation of others may be necessary for continued operation. We must be sure that employees know what is expected of them during a fire to assure their safety.

Our company trains employees through classroom instruction followed by a drill. Managers and supervisors also give all their employees (divided into small groups) a thorough briefing and demonstration.

Training, conducted on initial assignment, includes:

- Fire hazards to which an employee is exposed.
- What to do if an employee discovers a fire.
- Demonstration of alarm, if more than one type exists.
- How to recognize fire exits.
- evacuation routes.
- Assisting employees with disabilities.
- Measures to contain the fire (e.g., closing office doors and windows in the immediate vicinity).
- Headcount procedures (see EAP for details).
- Return to the building after the “all-clear” signal; and
- Those parts of the Fire Prevention Plan are necessary for self-protection.



If the onsite Plan Coordinator has reason to believe an employee does not have the understanding required, the employee must be retrained. The onsite Plan Coordinator certifies in writing that the employee has received and understands the Fire Prevention Plan training.

Any employee who does not comply with this plan will be disciplined.

### **FIRE PROTECTION EQUIPMENT TRAINING**

The Plan Coordinator provides training for each employee whose job duties require the use of fire protection equipment. Employees may not use fire protection equipment without appropriate training. Training, before an individual is assigned responsibility to fight a fire, includes:

- Types of fires
- Types of fire prevention equipment
- Location of fire prevention equipment
- How to use fire prevention equipment
- Limitations of fire prevention equipment
- Proper care and maintenance of assigned fire prevention equipment

Employees must demonstrate an understanding of the training and the ability to use the equipment properly before they are allowed to perform work requiring the use of the equipment.

## **REPORTING ACCIDENTS AND INCIDENTS**

### **PURPOSE**

Each employee is responsible for continually observing safety practices, guidelines, and standards throughout the workday and reporting any incidents.

### **SCOPE**

Any concerns or observations or incidents regarding a safety issue should be reported immediately to a supervisor, the Safety Manager, or any member of the Safety Committee. All safety concerns or suggestions will be reviewed by the Safety Committee. All reports will be investigated, and the root cause analyses were done. Concerns and suggestions may be made anonymously and without fear of reprisal.

### **PROCEDURE**

Our Injury Hotline # 877-532-8548 is available 24/7 and should be called if an employee is injured while at work. In the event an injured employee calls your office or comes to your office before they have called the Injury Hotline, please follow the Protocols below.

If an employee calls to report an injury to the office, take the call and be courteous. Ask them if it is life-threatening and if they need medical help immediately and if so call 911.

Always get their name and phone number at the beginning. Should they discuss any information regarding their injury/accident, be empathetic and take notes, but do not probe, just let them talk.

When completed send an email immediately to [infosafety@consumerdirectcare.com](mailto:infosafety@consumerdirectcare.com) with the information: who was injured, their phone number, and what they said about their injury/accident.

If not life-threatening, give them the Injury Hotline # 877-532-8548 and instruct them to call it immediately after they are finished speaking with you.

Give all injured workers or those inquiring about their worker's compensation the email [infosafety@consumerdirectcare.com](mailto:infosafety@consumerdirectcare.com) and our phone number 877-532-8542.

When an accident occurs notify the Safety Manager (Washington) and the Risk Manager immediately if it involved more than one employee, death of an employee, amputation, or hospitalization of the employee.

### **WORKERS' COMPENSATION**

All CDCN employees are covered by Workers' Compensation Insurance. This means that if an employee sustains a work-related injury or illness, CDCN's workers' compensation insurance carrier will provide oversight and appropriate compensation. Compensation can be in the form of paid medical expenses and/or compensation for work missed due to a work-related injury or illness.

The Safety and Risk Managers will handle all workers' compensation claims & reports. The Safety Manager will handle those that occur in Washington and the Risk manager will handle those that are within all the other states. If your office receives any workers' compensation-related documents, please forward them to the Risk Manager or in Washington to the Safety Manager immediately.

The injured employee must report the injury or illness immediately to the Safety Department via hotline 877-532-8542 or [infosafety@consumerdirect.com](mailto:infosafety@consumerdirect.com) to ensure coverage under State law.

Workers' compensation claims are then assigned to workers' compensation adjusters who monitor the claims, provide ongoing information to the injured employee, and work closely with the medical providers to ensure the injured employee is receiving appropriate treatment?

While an employee is on leave related to a workers' compensation injury, CDCN may designate the employee's leave as FMLA leave. If an employee on workers' compensation leave is approved for modified or light duty work but remains qualified for FMLA leave, he or she may still choose not to work and to instead use FMLA leave. However, the refusal of the modified or light duty work may lead to the loss of workers' compensation benefits.

### **EARLY RETURN TO WORK**

An injured employee needs to stay active while recovering from their injury. CDCN has established an Early Return to Work program to effectively accomplish this. When an injured employee's doctor releases the employee to work, but only under certain conditions/restrictions, the Safety or Risk Manager will contact the employee's supervisor to determine what "light/modified or

transitional” work is available. If available, the injured employee is offered a light-duty/modified duty position where they can work until released to full duty by their doctor. These light-duty/transitional positions are only temporary and can be discontinued if the injured worker is not improving or the light-duty/transitional position is terminated for cause. All temporary light-duty/transitional job duties will sign off by the employee’s physician.

## **CONTRACTOR SAFETY**

This policy informs interested persons, including employees, that our facility has developed a procedure to transmit safety information both from the company to contractors and their workers and from contractors and their workers to CDCN. Common sense and safety concerns encourage standardization of these communications. These procedures standardize information transfer to make sure that all concerned have the information they need to work safely.

### **PURPOSE**

A written contractor safety policy establishes guidelines to be followed for contractors working at our company. The rules established:

- Provide a safe working environment.
- Govern facility relationships with outside contractors.
- Ensure that contractors’ employees and our employees are trained to protect themselves from all potential and existing hazards.

The effectiveness of the contractor safety program depends upon the active support and involvement of all employees. This plan is intended to implement a program to ensure that all contractor work practices are carried out safely to minimize the possibility of injury or harm to the contractors’ employees or our employees. It is intended to serve as an additional tool in safeguarding the health and safety of employees.

The contractor safety policy establishes uniform requirements designed to ensure that contractor safety orientation, coordination, and safety administration practices are communicated to and understood by employees.

### **ADMINISTRATIVE DUTIES**

The Safety Manager is responsible for developing and maintaining the program. If after reading this program, you find that improvements can be made, please contact the Safety Manager. We encourage all suggestions because we are committed to the success of our contractor safety program. We strive for clear understanding, safe behavior, and involvement from every level of our company.

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**EXPLANATION OF RESPONSIBILITIES****Company Responsibilities**

CDCN has specific safety responsibilities when hiring contractors to come onto the worksite, onto the grounds, or into the buildings or facilities to perform work. Company responsibilities when hiring contractors include the following listed steps. The company will:

- Take steps to protect contract workers who perform work on or near a potentially hazardous process.
- Obtain and evaluate information regarding the contract employer's safety performance and programs.
- Explain the applicable provisions of the emergency action plan to the contractor and require that the contractor disperse that information to all workers who will work at this site.
- Develop and implement safe work practice procedures to control contract employee entry into hazardous work areas.
- Maintain a contract employee injury and illness log.
- Periodically evaluate the contract employer's fulfillment of his or her responsibilities under this policy.

**Contractor Responsibilities**

Contract employees must perform their work safely. Considering that contractors often perform very specialized and potentially hazardous tasks, such as confined space entry activities and nonroutine repair activities, their work must be controlled. Contractor responsibilities when accepting contracts with CDCN include the following listed steps. The contract employer will:

- Assure that the contract employee is trained in the work practices necessary to safely perform his or her job.
- Instruct the contract employee on the potential fire, explosion, or toxic release hazards related to his or her job and the process.
- Assure that the contract employee knows the applicable provisions of the emergency action plan.
- Document contract employee training.
- Inform contract employees of and then enforce safety rules of the facility, particularly those implemented to control the hazards of the contracting process during operations.
- Require that all subcontractors abide by the same rules to which the contractor is bound by this section.
- Abide by the facility smoking rules. Smoking is prohibited in certain areas of some facilities.
- Therefore, permission must be requested before the contractor's employees are allowed to smoke in any area.

**GUIDELINES FOR CONTRACTOR SAFETY**

The following listed steps are the standard procedures for evaluating and choosing contractors who will work on-site at CDCN.

To determine that past safety performance, the group or individual selecting the contractor should consider the contractors:

- Employee injury records such as Experience Modification Rate (EMR or MOD) for workers' compensation for the past three years and the contractor's past safety record in performing jobs of a similar nature.
- OSHA log, which includes the injury and illness rates (number of lost-time accident cases, number of recordable cases, number of restricted workday cases, number of fatalities) for the past three years.
- Incidence rates for lost-time accidents and recordable for the past three years.
- Written safety program and training system.

The contractor must be willing and able to provide a current certificate of insurance for workers' compensation and general liability coverage with the contracting company.

Each contractor must be responsible for ensuring that its employees comply with all applicable local, state, and federal safety requirements, as well as with any safety rules and regulations set forth by the company, at which it is performing the contracted work.

**COMPANY GUIDELINES FOR INFORMATION EXCHANGE**

Before contract work begins, CDCN must:

- Designate a representative to coordinate and communicate all safety and health issues and communicate with the contractor. The designated representative will have a copy of the working document, be thoroughly familiar with its contents, and with the safety and health aspects of the work or know who to call to obtain this information. The designated representative is responsible for ensuring that all company responsibilities listed below are carried out.
- Provide a copy of the facility's written safety policies and procedures to the contractor.
- Inform the contractor of any emergency signals and procedures that may be put into operation in areas where the contractor's employees are working. The contractor should be given the telephone numbers of the nearest hospital, ambulance service, and fire department.
- Inspect the proposed worksite area before the pre-start-up meeting so any known information about on-site hazards, particularly nonobvious hazards, is documented and thoroughly communicated to the contractor.
- Work directly with the contractor's designated representative, with whom all contacts should be made.
- Conduct a pre-startup meeting (walkthrough) with the contractor's designated representative and a supervisor from each of the areas of the plant involved in the contractor's work.

- Review all contract requirements related to safety and health with the contractor's designated representative, including, but not limited to, rules and procedures, personal protective equipment (PPE), and special work permits or specialized work procedures. Advise the contractor that the facility safety and health policies must be followed. A copy of the facility's safety plans must be furnished to the contractor.
- Inform the contractor's designated representative of the required response to employee alarms and furnish the contractor with a demonstration or explanation of the alarms.
- Communicate thoroughly with the contractor's designated representative any safety and health hazards (particularly nonobvious hazards and hazard communication issues) known to be associated with the work, including those in areas adjacent to the worksite. Tell them it is the contractor's responsibility to convey this information to its employees.
- Review preparation of worksite before the contractor begins initial work.
- Identify connect points for all services, such as steam, gas, water, electricity, etc. Define any limitations of the use of such services.
- Ensure that all affected employees at CDCN receive training on all hazards to which they will be introduced by a contractor.

During the contract work, CDCN must:

- Limit, as necessary, the entry of company employees into contractor work areas.
- Monitor the contractor's compliance with the contract throughout the work. When checking contractor work during the project, note any negligent or unlawful act or condition in violation of safety standards or requirements. Any items noted should be brought immediately to the attention of the contractor's designated representative in writing, with a copy of the notice being sent to the contractor's home office concurrently. However, if an unsafe act or a condition is noted that creates an imminent danger of serious injury, immediate steps should be taken with the contractor's designated representative, or in his or her absence, the contractor's employees to stop the unsafe act or condition. Do not allow work that violates a regulation to continue.
- Document all discussions, including place, time, and names of contractor employees in attendance.
- Approve the contractor beginning work each day unless it is routine service or maintenance work or periodic outdoor service or maintenance work.
- For work for which CDCN has developed specific and generally applicable procedures, make sure contractors and their subcontractors follow the same procedures.
- Do not allow the loaning of tools and equipment to outside contractors and their subcontractors. The contractor is required to provide the necessary tools and equipment.
- Contact the nearest medical facilities, when available, in emergencies where the severity of the injury dictates immediate attention.
- Obtain a copy of each OSHA recordable injury report from the contractor and subcontractor. Investigate and report to the facility manager all personal injuries to contractor and subcontractor employees.

- Investigate and report any property losses. Maintain a contractor accident report file.

After the conclusion of the contract work, the Safety Manager or designee completes a post-project assessment of the contractor's safety performance for the facility manager to be used for future reference, with a recommendation on whether to re-hire the contractor.

#### **CONTRACTOR GUIDELINES FOR INFORMATION EXCHANGE**

Before the contract work begins, the contractor must:

- Designate a representative to coordinate all safety and health issues and communicate with CDCN's designated representative.
- Provide documentation of any necessary safety training, as described in the Training Requirements section of this policy, to CDCN's designated representative.
- Sign a confidentiality statement to protect CDCN's proprietary data.
- Provide information to the designated representative on the safety and health hazards that may arise during the contractor's work at CDCN and the means necessary to avoid danger from those hazards, including Hazard Communication and all other potential hazards.
- Obtain from CDCN any safety rules and regulations in effect at the site or potential hazards present that may affect the contractor's work.
- Be certain to be informed of any emergency signals and procedures that may be put into operation in areas where the contractor's employees are working. The contractor should be certain to have the telephone numbers of the nearest hospital, ambulance service, and fire department.
- Advise and train its employees on hazards associated with the work to be performed, including any Hazard Communication or other hazard information provided to the contractor by CDCN's designated representative.
- Keep the designated representative of CDCN fully informed of any work which may affect the safety of CDCN's employees or property. This includes complying with the state and federal right-to-know legislation and providing the designated representative with appropriate safety data sheets (SDSs) or other required information about chemicals the contractor will bring onto the site.
- Know who to call and what to do in emergencies, including where first aid and medical services are located, and train employees on this.

During the contract work, the contractor will:

- Have a designated site safety coordinator present and attentive to the work being always carried out that the contractors and/or subcontractors are working at the facility site.
- Ensure that all subcontractors are abiding by the terms of this plan.
- Perform its work while the plant is operating, if necessary, and establish necessary safe practices to permit work under operating conditions without endangering CDCN's associates and property. This includes but is not limited to barricading signposting, and fire watches.



- Make sure that any equipment, chemicals, or procedures used by the contractor to perform contracted work meet all OSHA requirements.
- Be held responsible and accountable for any losses or damages suffered by CDCN and/or its employees because of contractor negligence.
- Provide its employees with medical care and first-aid treatment. Plant first-aid facilities may be used only in case of emergencies.
- Use only the plant or building entrance designated and follow the facility access control practice. The contractor also will ensure that each contractor employee is issued and wears some form of easily seen identification.
- Provide supervisors and employees who are competent and adequately trained, including training in all health and safety aspects of the work involved in the contract.
- Provide all tools and equipment for the work, including personal protective equipment (PPE), and ensure the equipment is in proper working order and employees are instructed in its proper use.
- Maintain good housekeeping in the workplace.
- Follow specific instructions supplied by CDCN should emergency alarms be activated.
- Notify the designated representative immediately of any OSHA recordable injury or illness to contractor employees or subcontractor employees occurring while on the site of CDCN. Provide a copy of each accident report to the designated representative.
- Receive and use a copy of the facility's written Accident Prevention Plan.

After the conclusion of the contract work, the contractor is responsible for cleaning all work areas and disposing of any discarded materials properly and legally.

#### **TRAINING REQUIREMENTS**

CDCN makes sure that affected company employees receive training on all hazards to which they will be introduced by a contractor.

In addition, we emphasize to the contractor that it is the contractor's responsibility to convey to its employees any safety information provided by the company or contractor.

#### **CONTRACTOR TRAINING REQUIREMENTS**

The contractor must:

- Train all workers on all safety and health hazards and provisions applicable to the type of work being done and provide documentation of such training to CDCN's designated representative.
- Train employees on where to obtain first-aid and medical services.

#### **COMPANY RECORD KEEPING REQUIREMENTS**

The designated representative will:

- Have a copy of the contract on file and be thoroughly familiar with its contents, and with the safety and health aspects of the work.



- Keep records of all training done with company workers regarding hazards to be caused by the contracting company.
- Keep copies on file of all forms or statements related to the contract that are required by the company to be filled out before or during contract work.
- Keep an OSHA recordable injury and illness log for the project, as well as copies of accident reports on all accidents that occur during the project.
- Keep a daily log regarding prework start-up inspection findings.
- Keep records of all documentation of any sort given to you by the contractor, including records of training done, SDSs, accident reports, etc.
- Keep records of all documentation of any sort you give to the contractor, including a list of hazards to training their employees on, SDSs, etc.
- Document all discussions, letters, memos, or other communications made to the contractor regarding safety issues, including place, time, and names of people involved.

#### **CONTRACTOR RECORDKEEPING REQUIREMENTS**

The contractor will:

- Keep records of all training done with contract workers and all documentation provided to the contracting company regarding such training.
- Keep copies on file of all forms or statements related to the contract that are required by the company to be filled out before or during contract work.
- Have on file the telephone numbers of the nearest hospital, ambulance service, and fire department.
- Have copies on-site of all safety data sheets (SDSs) or other required information about chemicals relevant to the work on-site.
- Keep an OSHA recordable injury and illness log for the project, as well as copies of accident reports on all accidents that occur during the project.

### **SAFETY COMMITTEE**

CDCN is committed to accident prevention to protect the safety and health of all our employees. Injury and illness losses due to hazards are needless, costly, and preventable. To prevent these losses, a joint management/worker safety committee will be established by employee elections each year. Employee involvement in accident prevention and support of safety committee members and activities is necessary to ensure a safe and healthful workplace

#### **SCOPE**

The role of the Safety Committee is to make accommodations to improve workplace safety, monitor the safety performance of the Company, and provide a means for any employee to voice safety concerns or suggestions.

**PURPOSE**

The purpose of our safety committee is to bring workers and management together in a non-adversarial, cooperative effort to promote safety and health in the workplace. The safety committee will assist management and make recommendations for change. Monthly meetings will be held with the committee determining the date, hour, and location of each meeting. The Secretary will keep minutes, which will include the names of members in attendance, documentation of all items, and reports discussed. A copy of all minutes and documentation is to be sent to the Safety Manager.

Employee representatives shall be elected by their peers. Employer representatives will be appointed. Safety committee members will serve a continuous term of at least one year. Employer-designated members will not exceed the number of employee-elected members.

It must be clearly understood that the safety committee advises management on issues that will promote safety and health in the workplace. Recommendations are expected from the safety committee and will be submitted to management through the management designee in writing. In turn, management will give serious consideration to the recommendations and will respond within a reasonable time.

**FUNCTIONS**

- Committee meetings and employee involvement.
- Hazard assessment and control.
- Safety and health planning.
- Maintain bulletin boards for the area to ensure that all notices are posted.
- Assists with investigation of accidents and submits reports of findings.
- Makes monthly safety inspections and reports on findings. The inspection report will be reviewed at the following safety committee meeting to assist in correcting the problems.
- Evaluate company safety programs for effectiveness.
- Others as determined by CDCN.

**RECOMMENDATIONS**

- All recommendations submitted to management must be written and should:
- Be clear and concise.
- Provide reasons for implementation.
- Show estimated costs and recommended completion dates.
- List benefits to be gained.

**PROCEDURES**

The committee's plan of action requires procedures by which the committee may successfully fulfill its role. Procedures developed should include but not be limited to:

- Meeting date, time, and location,

- Election of chairperson and secretary,

Duties of each member must include, but not be limited to:

- Reporting unsafe conditions and practices
- Attending all safety and health meetings
- Reviewing all accidents and near-misses
- Recommending ideas for improving safety and health
- Observing how safety and health are enforced in the workplace

### **HAZARD COMMUNICATION PROGRAM**

The purpose of this program is to inform interested persons, including employees, that CDCN is complying with the OSHA Hazard Communication Standard at §1910.1200 by compiling a hazardous chemicals list, using safety data sheets (SDSs), by ensuring that containers are labeled, and by providing our employees with training and information availability.

This program applies to all work operations in our company where employees may be exposed to hazardous substances under normal working conditions or during an emergency.

The Safety Manager, is the program coordinator, acting as the representative of the company, who has overall responsibility for the program.

Under this program, our employees will be informed of the contents of the Hazard Communication Standard, the hazardous properties of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals.

#### **HAZARD EVALUATION PROCEDURES**

Our chemical inventory is a list of hazardous chemicals known to be present in our workplace. Anyone who encounters the hazardous chemicals on the list needs to know what those chemicals are and how to protect themselves. That is why it is so important that hazardous chemicals are identified whether they are found in a container or generated in work.

The hazardous chemicals on the list can cover a variety of physical forms including liquids, solids, gases, and mists.

The Safety Manager and designees will keep the chemical inventory list, along with related work practices used in our offices on the Keller Link where it is accessible during work hours.

#### **SAFETY DATA SHEETS (SDSs)**

The SDSs we use are fact sheets for chemicals that pose a physical or health hazard in the workplace. SDSs provide our employees with specific information on the chemicals they use. The Safety Manager and/or designees are responsible for obtaining/maintaining the SDSs at our Offices. He/she will contact the chemical manufacturer or vendor if additional research is

necessary. All new procurements for the company must be cleared by Safety Manager or designees.

#### **LABELS AND OTHER FORMS OF WARNING**

Labels on containers entering the offices will have at least the product identifier, appropriate hazard warnings, and the name and address of the manufacturer, importer, or another responsible party. The same product identifier is found on the label, the SDS, and the chemical inventory. Therefore, the product identifier links these three sources of information. The product identifier used by the supplier may be a common trade name or a chemical name.

The existing labels on incoming containers of hazardous chemicals are not removed or defaced unless the container is immediately marked with an in-house label. Our labels are legible and prominently displayed, though their sizes and colors can vary.

A poster is displayed to inform employees about the hazard communication standard. It is in the lunchroom of each office.

If an employee transfers chemical from a labeled container to a portable container that is intended only for their immediate use, no labels are required on the portable container.

#### **TRAINING**

Everyone who works with or is potentially “exposed” to hazardous chemicals will receive initial training and any necessary retraining on the Hazard Communication Standard and the safe use of those hazardous chemicals by the training department.

“Exposure” means that “an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.) and includes potential (e.g., accidental or possible) exposure.” Whenever a new hazard is introduced or an old hazard changes, additional training is provided.

Information and training are a critical part of the hazard communication program. We train our employees to read and understand the information on labels and SDSs, determine how the information can be obtained and used in their work areas, and understand the risks of exposure to the chemicals in their work areas as well as the ways to protect themselves.

Our goal is to ensure employee comprehension and understanding including being aware that they are exposed to hazardous chemicals, knowing how to read and use labels and SDSs, and appropriately following the protective measures we have established.

The training plan emphasizes these elements:

- Summary of the standard and this written program, including what hazardous chemicals are present, the labeling system used, and access to SDS information and what it means.
- Chemical and physical properties of hazardous materials (e.g., flash point, reactivity) and methods that can be used to detect the presence or release of chemicals (including chemicals in unlabeled pipes).
- Physical hazards of chemicals (e.g., the potential for fire, explosion, etc.).

- Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical.
- Procedures to protect against hazards (e.g., engineering controls; work practices or methods to assure proper use and handling of chemicals; personal protective equipment required, and its proper use, and maintenance; and procedures for reporting chemical emergencies).

## **RETURN TO WORK POLICY**

It is the policy of CDCN to return employees suffering occupational injuries or illnesses to their regular duty jobs as quickly as our needs and their condition warrant. Employees who remain off work for long periods frequently experience slow healing, a loss of self-esteem, and other related physical and emotional side effects. Lost workdays also break up work teams and adversely affect our workers' compensation costs, both of which make us less competitive in our industry.

Injured employees will be offered modified duty jobs/tasks with the concurrence of their treating physicians and in accordance with all applicable laws and regulations where possible. We want to provide productive and necessary work that is consistent with good medical care, and which does not put the injured employee, the Company, or Clients, at risk.

### **RETURN TO WORK MANAGEMENT PROCEDURES**

The Safety Manager or designee will handle the return-to-work program and will obtain the necessary paperwork for the return-to-work program. The duties include:

- Effectively communicate this program to all Company employees.
- To act as the liaison between workers' compensation claims personnel, medical providers, employees, and the employee's Supervisor for implementing this program.
- Assist in the development of RTW job descriptions and task lists.

### **EMPLOYEE INJURY AND RETURN-TO-WORK-PROCEDURES**

- If the treating physician releases the employee to full-time regular duties, the employee must give their supervisor a signed release from the physician before they can return to work. The Supervisor then must give the signed release to the HR Department.
- Places physical restrictions upon the employee:
  - The Safety Manager or designee will inform the physician that the Company has modified duty available, and the injured employee will be assigned a modified duty position that is compatible with their medical restrictions.
  - Whenever practical, the position will be designed to facilitate a "return to work" experience so the employee can return to full productivity as soon as possible.
- The employee's performance shall be monitored to ensure they do not exceed the restrictions defined by the treating physician.

- Employees will remain assigned to the modified duty position until they are released for full duty, or they sign saying they no longer want to do light duty or if they are no longer progressing with their treatment.

### **MODIFIED DUTY CRITERIA**

Job modifications involve analyzing the workplace in terms of its tasks, equipment, and physical demands while allowing for productive work. Modified duty tasks are not permanent positions; however, they should be designed so that the employee feels like a productive worker.

### **RETURNING EMPLOYEES TO MODIFIED DUTY**

The first day back on the job is very important to the employee. At Management's discretion, the employee could start regular duties on any day of the week.

## **OFFICE SAFETY**

CDCN intends that all personnel understand the hazards associated with working in an office environment, how to mitigate those hazards and be able to work in a safe and healthy office environment. This includes the safe use of office equipment.

### **PURPOSE**

The purpose of this procedure is to provide general safety procedures for office personnel.

### **SCOPE**

This policy applies to all Company employees working in the office. This applies, but is not limited to the following hazards:

- General Office Safety
- Good Housekeeping Practices
- Slipping, Tripping, & Falling Hazards
- Fragrances and odors
- Cuts and Punctures
- Equipment & Furniture Safety
- Electrical Safety
- Office Ergonomics

**Note:** Emergency Evacuation is an integral part of office and building safety and is covered in the Emergency Action Plan. All employees are responsible for complete familiarity with evacuation procedures, including always knowing the emergency exits from any Company site in which they may find themselves.

### **GENERAL OFFICE SAFETY**

A large percentage of workplace accidents and injuries occur in office buildings, shops, or job site offices. Preventive measures are necessary to promote a safe and healthy working environment. Common causes of office accidents include the following:

- Slipping, tripping and falling

- Burning, cutting, and pinching
- Improper lifting and handling techniques
- Unobservant and inattentive employees
- Improper office layout and arrangement
- Dangerous electrical wiring
- Exposure to toxic substances
- Horseplay
- Using chairs or other office furniture as a step stool or ladder

### **GOOD HOUSEKEEPING PRACTICES**

Company employees are responsible for reducing potential hazards and keeping their work areas safe and clutter-free. Good housekeeping guidelines include keeping aisles and stairways free from clutter, cleaning spills, minimizing combustibles in the workplace and storage areas, and keeping exits free from obstructions. By keeping the office floor free neat and clean, employees can help eliminate most slip, trip, and fall hazards.

### **SLIP, TRIP, AND FALL**

Slips, trips, and falls are among the most common injuries that occur in the workplace. These injuries are perhaps some of the most preventable if employees pay attention to their surroundings, follow good housekeeping procedures, and do not run or rush. Keep the following in mind to avoid the risk of slips, trips, and falls:

- Never walk with an obstructed view.
- Avoid horseplay.
- Secure throw rugs and mats to prevent slipping hazards.
- Report or repair tripping hazards such as defective tiles, boards, or carpets to your supervisor immediately.
- Use caution on wet floors, particularly when wearing leather-soled shoes on hard surfaces such as linoleum or tile.
- Clean spills and pick up fallen debris immediately. Even a loose pencil or paper clip could cause a serious falling injury.
- Ensure that electrical cords, phone cords, and other items do not cross walkways or otherwise pose a tripping hazard.
- If a cord cannot be moved, a new outlet should be installed, or the cord should be secured to the floor with cord covering strips. Never tape down cords or run them under the carpet.

### **CUTS & PUNCTURES**

Cuts and punctures happen when people use everyday office supplies without exercising proper care. Employees should observe the following guidelines to help reduce the chance of cuts and punctures.

- Remove or protect all sharp edges, splinters, or splinters on furniture or equipment.
- Remove or turn down any protruding nails from surfaces or furniture.
- Do not carry pencils behind the ear or between the fingers with the point toward the palm.
- When sealing envelopes, use a liquid dispenser rather than licking the adhesive.
- Use caution when folding or handling paper to avoid paper cuts.
- Use caution when stapling.
  - When using or filling staplers, keep fingers away from the operating parts.
  - Ensure staples are fully closed when fastening papers together; and ○ Use a staple remover to remove staples.
- Use caution when cutting with sharp tools, including, kitchen knives, scissors; letter openers; box cutters, and paper cutters.

Ensure the arm of any paper cutter does not fall freely from an elevated position. If it does, it should be removed from service for either repair or disposal.

Use caution when handling broken glass and other sharp disposables Picking up broken glass Always wear gloves and use a broom and dustpan. Never use bare hands.

#### **EQUIPMENT SAFETY**

Common office machines and equipment, such as photocopiers, computers, microwave ovens, and coffee makers, may require special safety considerations.

Never operate any machine without first becoming adequately familiar with the appropriate operating instructions, whether from an operating manual or a qualified employee. Observe the following general guidelines to ensure machine and equipment safety:

- Secure machines that tend to move during operation. Do not place machines near the edge of a table or desk.
- Ensure that machines with moving parts are guarded to prevent accidents. ➤ Never remove any guards.
- Unplug defective machines and have them repaired immediately. ○ Do not use any machine that smokes, sparks, shocks, or appears defective in any way.
- Loose clothing or similar items can be seized by moving machinery. Use caution when wearing loose items around machinery with moving parts, including:
  - Loose belts.
  - Jewelry.
  - Long, loose hair.

When opening for maintenance, repair, or troubleshooting, exercise caution:

- Always follow the manufacturer's instructions for troubleshooting.
- Some parts may be hot.



- Paper shredders.

Always unplug before conducting maintenance, repair, or troubleshooting.

### **ELECTRICAL SAFETY**

Electricity is essential to the operations of a modern automated office as a source of power. Electrical equipment used in an office is potentially hazardous and can cause serious shock and burn injuries if improperly used or maintained. Electrical accidents usually occur because of faulty equipment, unsafe installation, or misuse of equipment on the part of office workers.

#### **General Electrical Safety Tips:**

- Replace or repair loose or frayed cords on all electrical devices.
- Avoid running extension cords across doorways or under carpets.
- In areas with small children, electrical outlets should have plastic safety covers.
- Follow the manufacturer's instructions for plugging an appliance into a receptacle outlet.
- Avoid overloading outlets. Consider plugging only one high-wattage appliance into each receptacle outlet at a time.
- If outlets or switches feel warm, shut off the circuit and have them checked by an electrician.
- When possible, avoid the use of "cube taps" and other devices that allow the connection of multiple appliances into a single receptacle.
- Place lamps on level surfaces, away from things that can burn, and use bulbs that match the lamp's recommended wattage.

#### **Outlet Safety**

The outlet, or receptacle, is perhaps the most used and least thought of device in the home and workplace. Every electrical appliance, tool, computer, and entertainment center component we use is powered through one. We just plug in and forget about it, assuming all our power needs will be met. And that's true if we follow some simple but important safety principles.

- Check outlets regularly for problems, including overheating, loose connections, reversed polarity, and corrosion. Consider having an electrical inspection performed by a qualified, licensed electrician to help determine the integrity of your outlets and your entire electrical system.
- Check for outlets that have loose-fitting plugs, which can lead to arcing and fire.
- Avoid overloading outlets with too many appliances. Never plug more than one high-wattage appliance in at a time each.
- Check for any hot or discolored outlet wall plates. Look from across the room; sometimes you'll see a darkened area in a teardrop shape around and above the outlet that may indicate dangerous heat buildup at the connections.
- Warm to the touch is OK, hot is not. If an outlet or switch wall plate is hot to the touch, immediately shut off the circuit and have it professionally checked.
- Replace any missing or broken wall plates.

### **Power Cords**

We can sometimes get so caught up in the safety awareness of our appliances and lamps that we forget about the safety principles that relate to its power cord. An appliance can look like it's in good operating order and yet still represent a hazard if its cord is damaged.

- Make sure all power cords and extension cords are in good condition, not frayed, cracked, or cut. If the power cord to a lamp or appliance is damaged, take the item to an authorized service center, or cut the power cord and dispose of the item safely. Cutting the cord helps ensure that no one else will pick up the item and take the hazard home with them.
- Never attempt to repair or splice a cut cord yourself. "Electrical" tape, as commonly referred to— usually black vinyl tape—is not rated for the heat generated by electricity running through wires. The tape will melt and burn.
- Make sure all electrical items, including appliances, extension cords, and surge suppressors, are certified by a nationally recognized independent testing lab, such as Underwriters Laboratories (UL), CSA, ETL, or MET.

### **Extension Cords**

Extension cords are temporary solutions only, and yet most homes and offices have at least one extension cord plugged in and left in place. Continual use can cause the insulation to rapidly deteriorate, creating a dangerous shock and fire hazard. In addition to the same safety tips that apply to power cords, keep the following principles in mind when using extension cords.

- Extension cords should only be used temporarily; they are not intended as permanent household wiring.
- A heavy reliance on extension cords is an indication that you have too few outlets to address your needs. Have additional outlets installed where you need them?
- Make sure extension cords are properly rated for their intended use, indoor or outdoor, and meet or exceed the power needs of the appliance or tool being plugged into it.
- Assume 125 watts per amp when converting to determine if the extension cord you intend to use is properly rated for the appliance being connected to it. For example, if your appliance indicates that it uses 5 amps at 125 volts, then its wattage rating is 625 watts (5 amps X 125 volts).

### **Power Strips and Surge Suppressors**

Power strips give us the ability to plug more products into the same outlet, which can be a help but also a hindrance to safety if used inappropriately. Power strips and surge suppressors don't provide more power to a location, just more access to the same limited capacity of the circuit to which it is connected. The circuit likely also still serves a variety of other outlets and fixtures in addition to the multiple electrical items you might be serving with the power strip. In addition to the tips above, keep these safety principles in mind when using power strips and surge suppressors.

- Be sure you are not overloading the circuit. Know the capacity of the circuit and the power requirements of all the electrical items plugged into the power strip and all the other outlets on the circuit, as well as the light fixtures on the circuit.

- A heavy reliance on power strips is an indication that you have too few outlets to address your needs.
- Understand that a surge suppressor only protects the items plugged into it, not back along the circuit into which it is connected.
- Surge suppressors can manage the small surges and spikes sometimes generated by turning on and off appliances. They may even protect against a large surge generated from outside sources like lightning or problems along the power lines to the office or house. In the event of a large surge or spike, the surge suppressor is a one-time-use protector and will likely have to be replaced.
- Consider purchasing surge suppressors with cable and phone jacks to provide the same protection to your phone, fax, computer modem, and television.
- Not all power strips are surge suppressors, not all surge suppressors can handle the same load and events. Be sure the equipment you buy matches your needs.

### **FURNITURE**

Other office equipment requiring safety consideration may include furniture, such as file cabinets, shelves, ladders, chairs, and desks.

- File cabinets:
  - Secure weighted file cabinets.
    - Bolt either to the floor or wall.
    - Avoid creating top-heavy cabinets.
  - Ensure that cabinet drawers cannot easily be pulled clear of the cabinet.
    - Avoid toppling by opening only one drawer at a time.
    - If two drawers of a file cabinet can be opened at the same time, remove the cabinet from service for repair or replacement.
  - Fill cabinets from the bottom to the top.
  - Unload items from the cabinet from the top first, working downward.
  - Close drawers completely when not in use.
  - Do not place heavy objects on top of cabinets.
  - Close drawers slowly using the handle to avoid pinched fingers.
- Shelves:
  - Secure shelves by bolting them to the floor or wall. O, Place heavy objects on the bottom shelves.
  - Ensure that there is a space of at least 18 inches between the top shelf items and the ceiling to allow ceiling sprinklers to function properly in the event of a fire.
  - Never climb on shelves (even lower shelves).
  - When climbing, always use an approved ladder or step stool.
- Ladders and Step Stools (General):
  - Employees should always use an approved ladder or step stool to reach any item above their extended height.

- Never use a makeshift device, such as a desktop, file cabinet, or bookshelf as a substitute ladder or stool.
- Ladders and Step Stools (Positioning):
  - Never use a ladder or step stool in front of a door unless the door is locked and barricaded.
  - Keep areas around ladders and step stools clean and free from debris.
  - Place ladder feet and step stools firmly and evenly on the ground or floor.
  - Place ladders and step stools on slip-free surfaces even if they have slip-resistant feet.
  - Secure the ladder or step stool if a slip-free surface is not available.
  - Ensure the ladder or step stool is sitting straight and secure before climbing.
    - Never use step ladders that are pitched backward on an incline.
    - Never use ladders that lean sideways due to surface conditions; and
    - If one foot sits in a low spot, build up the surface with firm material.
  - Never try to make a ladder or step stool reach farther by setting it on boxes, barrels, bricks, blocks, or other unstable bases.
  - Never load a ladder above its intended weight capacity.
  - Never stand on the top of a step ladder; it can become unstable.
  - Read and follow all warning stickers.
  - Never use broken or damaged ladders or step stools.
  - Never try to move a ladder or step stool while anyone is on it.
  - Never overreach from a ladder or step stool or lean too far to one side. Overreaching is a common cause of falls from ladders and step stools. Two rules of thumb are:
    - Employees should always keep their belt buckles inside the rails of a ladder; and
    - Employees should work only as far as they can reach comfortably and safely before moving the ladder or step stool to a new position.
- Chairs:
  - Never climb on any office chair.
  - Do not tilt office chairs back such that any chair leg or support leaves the floor, particularly if they are swivel chairs or have wheels.
  - Take care when sitting in a chair with rollers. Ensure it does not roll away when sitting down.
  - Repair or report any chair damage that could be hazardous.
  - Never roll chairs over electrical cords.
- Desks:
  - Ensure desks are in good condition, free from sharp edges, nails, and other hazards.
  - Ensure desks do not block exits or passageways.
  - Ensure that glass-top desks do not have sharp edges.
  - Keep desk drawers closed when not in use.

- Report or repair any desk that is damaged.

### **OFFICE ERGONOMICS**

Proper ergonomic positioning and consideration can help to prevent many repetitive-stress injuries that can commonly occur in the office environment. Following are some areas that warrant special consideration.

#### **Strain and Stress**

- Preventing Back Strain:
  - When lifting heavy objects, employees should:
    - not lift beyond their strength.
    - keep their backs straight and lift using their legs.
    - never twist while lifting.
  - always request help when needed, and ➤ use proper moving equipment.
- Preventing Eye Strain of Video Display Terminals (VDT) ➤ Images
  - VDT images should be clear and well defined.
  - Adjust the screen's brightness, contrast, and display size as required.
  - If a screen flickers or jumps, have it repaired or replaced.
  - Placement
    - The VDT should be placed 20-28 inches away from the user's face.
    - The center of the VDT should be approximately 15 to 25 degrees below the user's line of vision.
  - Document holders
    - Keep documents at approximately the same height and distance from the user as the VDT screen.
  - Lighting
    - Lighting around computer workstations should illuminate the work area without obscuring the VDT or causing glare.
    - Position computer screens, draperies, and pictures to reduce glare during work hours.
    - For example, place the VDT screen at a right angle to the window, so that the window does not reflect in it.

Consumer Direct Care Network is committed to providing a safe and healthy workplace, safe working methods, and the provision of safe equipment. Workplace health and safety is considered by management to be an integral and vital part of the successful performance of any job. If you have questions about this Accident Prevention Plan or safety in general, please reach out to one of the following contacts:

Safety Department: 877-532-8542

Risk Management: 888-541-1701