

2025

Accident Prevention Plan

		
<h2>Mission</h2> <p>To provide care and support to people in their homes and communities</p>	<h2>Vision</h2> <p>To help people live the life they want</p>	<h2>Values</h2> <p>Respect, Integrity, Service, Excellence</p>

Safety

Consumer Direct Care Network

1/1/2025

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SAFETY STATEMENT

Safety is an essential 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 acknowledge their obligation to conduct themselves regarding their safety and 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 employees suffer from accidents is also essential. These goals justify a constant and intensive accident prevention program. The APP will be reviewed and updated annually in July.

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

PURPOSE

All employees are covered by and 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 according to 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. Company policies, rules, and procedures are provided to all workers and disseminated periodically as needed.

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

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 aims to instill in each employee an attitude to think safely, work safely, and be considerate of co-workers. Accidents 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 establishing and maintaining 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/Directors

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

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 supervisory structure is in place. For caregivers, in States where CDCN operates in a Co-Employment model, the Client or Authorized Representative operates as the supervisor. To accomplish this obligation, supervisors will:

1. Ensure all workers understand all safety and health rules, regulations, policies, and procedures and review 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.

All Employees

1. Follow all job safety rules that apply to their specific task assignments.
2. Report hazardous conditions to their supervisor.
3. Stay with-in the allowed tasks in the care plan.
4. Attend and take an active part in safety training and meetings.
5. Report all accidents and safety concerns immediately.
6. Notify the service coordinator and case manager of changes in the client's ADLs.

SAFETY DISCIPLINARY POLICY

CDCN believes a safety and health accident prevention program is unenforceable without some disciplinary policy. Our company believes that to maintain a safe and healthy workplace, the employees must be conscious of 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.

A progressive process designed to inform IPs of deficiencies in their work or behavior and to give them the tools and counseling available to help them become successful. Reasons for Corrective Action include but are not limited to helping them become successful. Reasons for Corrective

Action include, but are not limited to, unsafe work practices, IP and APP handbook violations, performing tasks outside of the Care Plan, expired training credentials, and Client authorization violations.

The progressive corrective action steps will be cumulative for all Clients the IP works for, even if violations differ for each step. Additional violations will fall into the next progressive corrective action step regardless of type.

Documented Notice

A verbal conversation or electronic communication is designed to inform the IP of initial violations. There will be a documented record of this communication in the IPs worker profile.

First Written Warning

A written warning is the second step of the progressive corrective action process. This step may also be used as a first step for more severe violations by an IP.

Final Written Warning

A final written warning is the third step in the progressive corrective action process. This step may also be used as a first step for even more severe violations by an IP.

Termination

Termination of Employment is the final step in the progressive corrective action process. This step is used when an IP has been given multiple opportunities to correct one or more violations but has continually failed to do so. There may be some violations that are severe enough to require immediate termination.

Corrective Action Expiration

Corrective actions will expire twelve months after they are issued but will remain in the IP's personnel file indefinitely. Any subsequent corrective actions will revert to the prior step in the process.

Please see OP_WA_020-1.0WA-WA policy in the IP handbook for further information regarding this policy.

SAFETY ORIENTATION

When first hired, each employee will be given a safety orientation with the Union Training and CDCN LMS training system. The orientation will cover the following items:

- Our Accident Prevention Plan and where it is located.
- Client Care Plans - the tasks and Hazards with assigned duties of the client.
- How to get your client's needs met if they change
- Safe Driving
- How to Report an incident or injury

- Abuse, Neglect & Exploitation - Who is at risk, types and what to do and where to report
- Bloodborne Pathogens Training
- Personal Protective equipment. - When do you wear it, and how do you receive it?
- Fire safety and Natural disasters
- Hazcom and Ladder safety

PERSONAL PROTECTIVE EQUIPMENT

CDCN believes we must provide a hazard-free environment for 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 should not be relied on as the only means to protect against hazards. Instead, PPE devices are used 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 they use PPE properly in the workplace. If you find improvements that can be made after reading this program, 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 company level. 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 responsible 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 and other appropriate employees identify 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:
 - Food Preparation
 - Household Cleaning

- Chemical or biological
- Lifting, carrying load limits
- Electrical
- Airborne hazardous-infectious disease
- An estimate of the potential for injuries is then made for each hazard. Each of the primary 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 following:
 - 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 available PPE, 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 to 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.

The Safety Manager is responsible for reassessing the workplace hazard situation as necessary, identifying and evaluating new equipment and processes, reviewing injury and illness records, and reevaluating 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. Below is an example of Washington's PPE kit:

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 knows the purpose of wearing PPE and how the equipment will be worn is to train each employee.

CDCN or an outside agency will train each employee 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 training video and is followed by a quiz for understanding. They can email or phone the safety department if they have additional questions. In turn, each employee must demonstrate an understanding of the training and the ability to use the PPE properly before being allowed to perform work requiring the use of the equipment. This training is given annually.

Employees are prohibited from performing work without donning appropriate PPE to protect them from the hazards they will encounter during 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

All non-disposable PPE must be kept clean and adequately 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 and co-employers are responsible for ensuring compliance with cleaning responsibilities by employees.

EXPOSURE CONTROL PLAN

CDCN is committed to providing a safe and healthy work environment for all our 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 and WAC 296-823-160.”

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

Employees covered by the bloodborne pathogen's 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 can review this Plan anytime during their work shifts by contacting the Safety Department.

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 that affect occupational exposure and to reflect new or revised employee positions with occupational exposure.

PROGRAM ADMINISTRATION

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

Employees 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 Safety 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 WAC 296-823

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 must list all job classifications in which all employees may be expected to incur such occupational exposure, regardless of frequency. The following job classifications are in this category for this company.

- Caregiver/Individual Provider
- Nurse (RN/LPN) (In states where it applies)
- Service Coordinator
- Field Coordinator
- Training Coordinator

In addition, OSHA requires listing 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
- 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 take 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 with a reasonable likelihood of occupational exposure. Food and drink should not be stored in refrigerators, freezers, shelves, cabinets, or 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 by reviewing records, maintaining incident logs, and analyzing trends through Safety Committee activity.

HEPATITIS B VACCINATION

Hepatitis B vaccine is available to all employees (with 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 free after training and upon hire. Employees can choose if they want to receive the Hepatitis B series. The safety coordinator will arrange vaccinations for the contract locations.

Employees who refuse 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 immediately reported to the Injury Hotline at 877-532-8542.

POST-EXPOSURE PROTOCOL

Employees must inform their Case Manager of an exposure incident 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 will be 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 healthcare 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 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 that require further evaluation or treatment.

All other findings or diagnoses will remain confidential and 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 the following:

- 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 is performed when the incident occurred
- Employee training

The Safety 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 evaluating safer devices, adding employees to the exposure determination list, etc.).

EMPLOYEE TRAINING

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

All employees with 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 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 includes the method of reporting the incident and the medical follow-up the employer must 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.

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 the people attending the training sessions.

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

OSHA Recordkeeping

An exposure incident is evaluated to determine if the case meets OSHA's Recordkeeping Requirements (29 CFR 1904). The Safety Department determines and records these activities.

Sharps Post Incident Protocol and Injury Log

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

- 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.

A "sharp" is any object that can puncture the skin and be contaminated by blood or body fluids.

The protocol for all percutaneous injuries is:

1. Allow the puncture site to bleed,
2. Wash the site with soap and water immediately
3. Report the incident immediately to the safety Hotline at 877—532-8542 and report to your supervisor
4. Report to an Emergency Room closest to you

FIRST-AID PROGRAM

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

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 program's success.

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 legally obligated to perform first aid. Responds as a "Good Samaritan." Uses limited equipment to perform an initial assessment and provide immediate life support and care while awaiting the arrival of emergency medical services (EMS).

A list of CDCN personnel trained and responsible for rendering first aid is kept at each local office.

HAZARD AND MEDICAL SERVICES ASSESSMENT

The Safety Manager 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 ensures adequate first-aid supplies are readily available.

The Safety Manager or designee is responsible for ensuring adequate first-aid supplies. 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 trained and qualified. They are trained to contact a designated qualified individual.

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

RECORDKEEPING

The employees are required to notify and submit incident reports to the Safety Department. The Safety Manager is responsible for maintaining records relating to CDCN's first aid, injury, illness, and accident 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

This program plan aims to ensure adequate protection from respiratory hazards and 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 responsible for respirator wearers will be held accountable for implementing and enforcing 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 the 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 using respiratory protection devices in a language and manner the employee can comprehend.
- Designate supervisors or co-employers as responsible for ensuring that all personnel know the respiratory protection requirements for their work areas. Supervisors or co-employers ensure that their subordinates comply with all facets of the respiratory protection program.

It is the employee's responsibility to:

- As explained by management, be aware of the respiratory protection requirements for their work area.
- 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 CDC states that Particulate Respirators may be indicated in the following situations:

- When appropriate ventilation is unavailable, 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 protect against certain airborne particles in a size range of 0.1 to >10.0 microns. The Company's respirators will meet the CDC guidelines for TB exposure control and Covid-19 exposure.

USE OF APPROVED RESPIRATORS

All Nurses (in states with Nurses) and Caregivers 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 and supplied free of charge.

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 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 performed if a condition occurs which may change how the respirator fits, such as a significant weight change. Fit testing must be conducted according to the instructions included with a Qualitative Fit Test Kit, and documentation must be made regarding the pass or fail of the fittest. Fit testing will be performed before the initial assignment or use. The protocols for appropriate testing include the saccharin qualitative fit test. The Safety Department will arrange testing.

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

returned 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 used, the respirator should be stored in a plastic bag labeled with the wearer's name. It is essential 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 not shared. It is inappropriate to fold the respirator and place it in a pocket or to manipulate it to an abnormal shape or position that may impair its function. Respirators should be stored in a convenient, clean, and easily accessible location when not in use.

INSPECTION

To ensure adequate protection, the wearer shall inspect all respirators immediately before and after each use. The inspection shall include, as a minimum, the following items:

- Appropriate NIOSH approval numbers on filters (N95)
- Elasticity, cracks, tears, holes, or other distortions would diminish the effectiveness of the facepiece.
- Ensure the 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

Adequate 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 correctly using 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 particulate respirator's limitations in preventing airborne disease transmission.

WORKPLACE SURVEILLANCE

The Safety Manager will evaluate the Respiratory Protection Program annually to ensure that the employees follow 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 that interferes with direct contact with the skin may compromise the respirator's fit.

Qualitative saccharin fit testing is used to demonstrate satisfactory facial fit. To follow OSHA standards, appropriate 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 their employees and clients. Equally, employees assigned the privilege of driving a Company-owned or leased/rented vehicle and 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 operating a vehicle during Company business.

DEFINITIONS

Company 'business' or 'business purpose' is defined as any activity performed with the primary 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, from the company office to a store to pick up supplies, and from one Client's home to another Client's home.

DRIVER AUTHORIZATION, TRAINING, AND MONITORING

It is a Company policy and requirement that every employment position with driving duties requires a motor vehicle record ("MVR") meeting the grading requirements stated below. This MVR policy applies to drivers of Company-owned and leased/rented vehicles and 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 after that. 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 with driving duties also requires an MVR meeting the criteria 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 in the table below, for continued employment in positions with driving duties.

Any exceptions to these guidelines will be referred to senior management for written approval.

MOTOR VEHICLE RECORD SCREENING

The Company shall request MVRs periodically for Independent Provider with driving duties and privileges. Each administration employee with driving duties will receive an MVR at the time of hire and in June of each year. This screening ensures that all designated drivers who operate motor vehicles 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, the Human Resources Business Partner, and the Safety 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., transparent 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 terminates 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 Minor 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
Major Violations				
One 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, one at-fault accident and two or fewer violations, or two at-fault accidents in the last three years and more irregular than two violations.

"Poor" MVR - one or more significant 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.

Significant 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 is 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 these policies and procedures. This fleet is operated to enable the Company to serve its customers better. 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 allowed to do so, in writing, by an Officer of the Company and notification to the Fleet manager.

When authorized in writing by an officer of the Company, Company-owned vehicles may be used by employees for commuting to and from work. Still, if done, the individual will incur a tax liability that will be reported to the IRS as taxable imputed income. The Accounting Department maintains the current value of this benefit. 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 following day 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 and notification to the Fleet Manager.

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 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?

If the vehicle is unsafe, do not use it. Any problems should be reported to fleetsafety@consumerdirectcare.com immediately.

Manufacturers' recommended intervals for oil changes, filters, lubrication, tune-ups, etc., will be tracked, and notification for maintenance will be sent to the office where the vehicle is assigned. All Company-owned vehicles will have a tracking system on them. Any disabling or tampering with the system will result in disciplinary action.

The Company has established procedures for recording Company vehicle maintenance. A Vehicle Maintenance Form will be kept in each Company-owned vehicle. The Fleet Manager should review this Form periodically 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. Failure to maintain good 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, 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 voicemail.

SEAT BELTS

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

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

If 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.

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. Notify the fleet department immediately following the accident.
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. Immediately notify the fleet department at fleetsafety@consumerdirectcare.com or 877-532-8542
4. If a rental car is involved in an accident, notify the Company Safety Manager immediately.

If not seriously injured, the employee shall document the accident in writing with the date, time, location, and brief description 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 or phone 877-532-8542.

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

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

The Review Committee shall review each motor vehicle accident. The Safety Manager, the employee's manager, or those involved in reviewing the accident will determine whether the employee engaged in the accident shall retain their Company-related driving privileges and/or, whether any other disciplinary action will be taken.

The investigation results 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.

REVOCATION 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.
- We are 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 employees are provided with Company-owned or leased vehicles for business needs. 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 business use activity.

Supervisory personnel are to discuss and review these rules with all authorized drivers. In addition, all newly hired personnel assigned 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 driver's responsibility.
5. Approval to operate a Company-owned vehicle for personal use can only be given by an Officer of the Company, and notification is sent to the Safety Manager.

VIOLENCE PREVENTION PLAN

CDCN and its associated companies strive to maintain a safe workplace for every employee, whether 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. Abuse complaints are promptly and thoroughly investigated, and offenders are subject to severe disciplinary action, including termination. All acts of criminal violence in the workplace will be vigorously prosecuted.

OBJECTIVE

This Policy aims 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, results in an employee's fear of loss of job and/or decreasing self-esteem.

OFFICE SAFETY PROCEDURES

1. Each office must establish a codeword or phrase to communicate 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 the 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 the visitor cannot be managed, 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 of a potential problem. If another staff person is unavailable and the visitor exhibits 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-workers know they are alone.

HOME VISIT SAFETY

Some of the clients served may sometimes have trouble directly expressing emotion and managing behavior, which increases employees' risk of being harmed. All administrative staff is trained in basic de-escalation techniques to prevent 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 during a home visit. (Giving your cell phone or home phone to Clients is not good practice. 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 house 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 problems 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, ensure 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 entering.
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 are in a remote area, turn the hazard lights on. Use flares if you have them, and tie a white cloth to the antenna. Stay inside the car, 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 whose car has broken down at work time. Instead, help the person by using your cell phone and calling the police.
12. If you are being followed, DO NOT drive home. Instead, go 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 the car's description and license plate number 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 solve 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 "yeses" 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 incident of aggression or safety 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 security 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

Work is 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 will occur.

This Emergency Action Plan (EAP) aims 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 disseminated, reviewed, and practiced annually. The Plan includes the posting of the emergency procedures throughout each

site. Telephone numbers are posted so emergency response personnel can be notified, rapidly enter the location, and have immediate access to all areas and personnel. Caregivers receive training and directions on a personal EAP for each client at home in their onboarding training and annual review.

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 about the nature of the emergency and start evacuating the area. Personnel in the company facilities shall start evacuating immediately. Proceed to the designated assembly point, contact the supervisor or person 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 assembly area, each supervisor shall conduct a headcount of the employees in their respective departments. Roll call will be taken, and the roll call sheet will be 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 site.
- 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 an emergency, inform your supervisor of any other hazards associated with the area or any additional 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 result from 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 unavailable, move into a corner and protect the head and neck in any way possible.

- Stay inside if you are already there.
- Stay near the center of the building, away from glass windows, skylights, and doors.
- Do not run through or near rooms with 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 you are reasonably sure the earthquake is over.
- Remove incapacitated employees from 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 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, 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 perform the investigation: interview all witnesses (documenting information), ensure extensive photo documentation is served, complete the damage report, and request copies of any reports completed by local law enforcement.

SEVERE WEATHER-WINTER STORMS

Company facilities may be subject to severe winter storms, bringing heavy snow, ice, strong winds, freezing rain, 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 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 intense storms can cause, can occur 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:

- The weather forecast should be monitored throughout the day if there is a forecast for thunderstorms, especially severe storms.
- 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), ensure everyone is indoors and 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 trained to verify 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 within a reasonable period, contact the addressee and ask them to identify the package. If the addressee recognizes the box and is confident 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 get 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 an evident 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.
- Please 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. A thief can find your car or house if your keys are lost or stolen.
- Do not approach someone if they are loitering near your vehicle. Walk to a safe place like 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 are uncomfortable walking to your vehicle; 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 FPP is in place at this company to control and reduce the possibility of fire and to specify the type of equipment to use in case of fire.

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 crises, and the alarm system. The program is closely tied to our Emergency Action Plan, where procedures are described for emergency evacuation procedures and exit route assignments, methods 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 is responsible for the plan. The Safety Manager designates the onsite coordinator.

The FPP communicates policies and procedures for employees in a fire emergency. On request, this written plan is available 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.
- Satisfy all local fire codes and regulations as specified.

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.
- Equipment is placed and locked in storage rooms or desks for protection when practical.
- The building owner/superintendent is contacted, informed of the action taken, and asked to assist in coordinating security protection.
- Conduct drills to acquaint the employees with fire procedures and to judge their effectiveness.
- In locations where the building owner/superintendent is unavailable, 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 independently without an external ignition.

FIRE PROTECTION EQUIPMENT

The Safety Manager or designee selects and purchases fire protection equipment used at CDCN.

HOUSEKEEPING PROCEDURES

Our company controls accumulations of flammable and combustible waste materials and residues so 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 fire risk due to improperly stored or disposed of materials: garbage cans must be dumped daily, and all food heating or cooling equipment must always be attended to.

FIRE PREVENTION PLAN TRAINING

During a fire, employees should know what 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 essential. In smaller fires, a partial evacuation of nonessential employees with a delayed evacuation of others may be necessary for continued operation. We must ensure employees know what is expected of them during a fire to ensure 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 the 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 and 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 and Emergency Action Plan are necessary for self-protection.

If the onsite Plan Coordinator believes 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

Employees may not use fire protection equipment. We evacuated all fires. Our employees are not trained to use fire extinguishers.

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, observations, or incidents regarding a safety issue should be reported immediately to a supervisor, the Safety Manager, or any member of the Safety Committee. The Safety Committee will review all safety concerns or suggestions. All reports will be investigated, and root-cause analyses will be done. Problems and offers may be made anonymously and without fear of reprisal.

PROCEDURE

Our Injury Hotline number at 877-532-8542 is available 24/7 and should be called if an employee is injured. If an injured employee calls or comes to your office before reaching 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, 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, email infosafety@consumerdirectcare.com with the information: who was injured, their phone number, and what they said about their injury/accident.

If not, give them the Injury Hotline number, 877-532-8542, and instruct them to call it immediately after speaking with you.

Give all injured workers or those inquiring about their workers' compensation an email at infosafety@consumerdirectcare.com and our phone number: 877-532-8542.

When an accident occurs, notify the Safety Manager immediately if it involves more than one employee, the death of an employee, amputation, or hospitalization of the employee.

ACCIDENT INVESTIGATION

ACCIDENT INVESTIGATION PROCEDURE

The CDCN Safety Department will lead the investigator on all incidents and accidents involving CDCN employees. The investigations will be handled in the following manner. All will be investigated immediately after the incident and reported to the Info Safety email.

An Incident-only investigation:

1. The safety coordinator will conduct a phone interview with:

- The employee who was involved
 - Any witnesses that are known.
2. An incident report will be sent to the affected employees to complete and return. The Safety Coordinator will enter the incident into our accident tracking system and determine the root cause.
 3. The root cause and incident will be reviewed with the safety committee.

An incident with an injury involving a visit:

1. The safety coordinator will conduct a phone interview as soon as we know about the incident:
 - The employee who was involved
 - The client /or client representative
 - Any witness who was at the location of the incident
2. An incident report will be sent to the affected employees to complete and return. The Safety Coordinator will enter the incident into our accident tracking system and determine the root cause.
3. Request for pictures from the client /or client representative of the area and objective that was involved (not personal pictures, only objects and regions of the incident)
4. The safety committee will investigate the root cause and incident

An incident with an injury involving a doctor visit and/or transported by ambulance:

1. The Safety Coordinator will conduct a phone interview as soon as we know about the incident:
 - The employee who was involved
 - The client /or client representative
 - Any witness who was at the location of the incident
2. An incident report will be sent to the affected employees to complete and return. The Safety Coordinator will enter the incident into our accident tracking system and determine the root cause.
3. Request for pictures from the client /or client representative of the area and objective that was involved (not personal pictures, only objects and regions of the incident)
4. The supervisor and safety committee member will be involved in the investigation and phone interview.

An incident with an OSHA-reportable injury involving reportable injuries to OSHA:

1. The safety coordinator/manager will conduct a phone interview initially as soon as we know about the incident and then will be on the scene within 24 hours of Knowledge of the

incident. They will report the incident to upper management as soon as it is known. They will interview and photograph relevant scenes.

- An employee who was involved
 - The client /or client representative
 - Any witness who was at the location of the incident
2. The safety coordinator/manager will be on the scene within 24 hours of knowledge of the incident. They will report the incident to upper management as soon as it is known. They will interview and photograph relevant scenes.
 3. An incident report will be sent to the affected employees to complete and return. The Safety Coordinator will enter the incident into our accident tracking system and determine the root cause.
 4. Request for pictures from the client /or client representative of the area and objective that was involved (not personal pictures, only objects and size of incidents)
 5. The safety committee will work on the root cause and review the accident investigation.

WORKERS' COMPENSATION

Workers' Compensation Insurance covers all CDCN employees. 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 paid for medical expenses and/or compensation for work missed due to a work-related injury or illness.

The Safety Manager will handle all workers' compensation claims and reports. If your office receives any workers' compensation-related documents, please forward them to the Safety Manager immediately.

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

Workers' compensation claims are then assigned to workers' compensation adjusters who monitors the claims, provides ongoing information to the injured employee, and works closely with the medical providers to ensure the injured employee receives 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, they may still choose not to work and instead use FMLA leave. However, refusing the modified or light-duty work may lead to losing 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 accomplish this effectively. When an injured employee's

doctor releases the employee to work, but only under certain conditions/restrictions, the Safety Manager will contact the supervisor to determine what “light/modified” 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 positions are only temporary and can be discontinued if the injured worker is not improving or the light-duty position is terminated for cause. The employee’s physician will sign off all temporary light duty.

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. A joint management/worker safety committee will be established by employee elections each year to prevent these losses. Employee involvement in accident prevention and supporting 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 company's safety performance, and provide a means for any employee to voice safety concerns or suggestions.

PURPOSE

Our Safety Committee aims 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, including the names of members in attendance, documentation of all items, and reports discussed. The Safety Manager will send a copy of all minutes and documentation.

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 employees elected as members. Safety Committee members will be made up of both office non-supervisors and Caregivers.

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 control in writing through the management designee. In turn, management will seriously consider the suggestions and respond quickly.

FUNCTIONS

- 866-214-9899
- 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.
- Assisted with investigation of accidents and submitted reports of findings.
- Make 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.
- Fire extinguisher inspection.
- 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), 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 company's representative, with 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. If an employee encounters any chemical not on the list, they are not to use it until they have notified safety at Infosafety@consumerdirectcare.com and that chemical or product has been added to our list. Anyone encountering the hazardous chemicals on the list must know what those chemicals are and how to protect themselves. That is why hazardous chemicals must be identified, whether found in a container or generated at work.

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

The Safety Manager and Coordinators will keep the chemical inventory list and related work practices used in our offices on the JJ Keller Link accessible to all employees.

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 Safety Coordinators are responsible for obtaining/maintaining the SDSs at our workplace. They will contact the chemical manufacturer or vendor if additional research is necessary. The Safety Manager must clear all new procurements for the Company.

LABELS AND OTHER FORMS OF WARNING

Labels on containers entering the workplace 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 supplier's product identifier may be a standard trade or 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 brand. Our labels are legible and prominently displayed, although their sizes and colors vary.

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

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 training department's safe use of those dangerous chemicals.

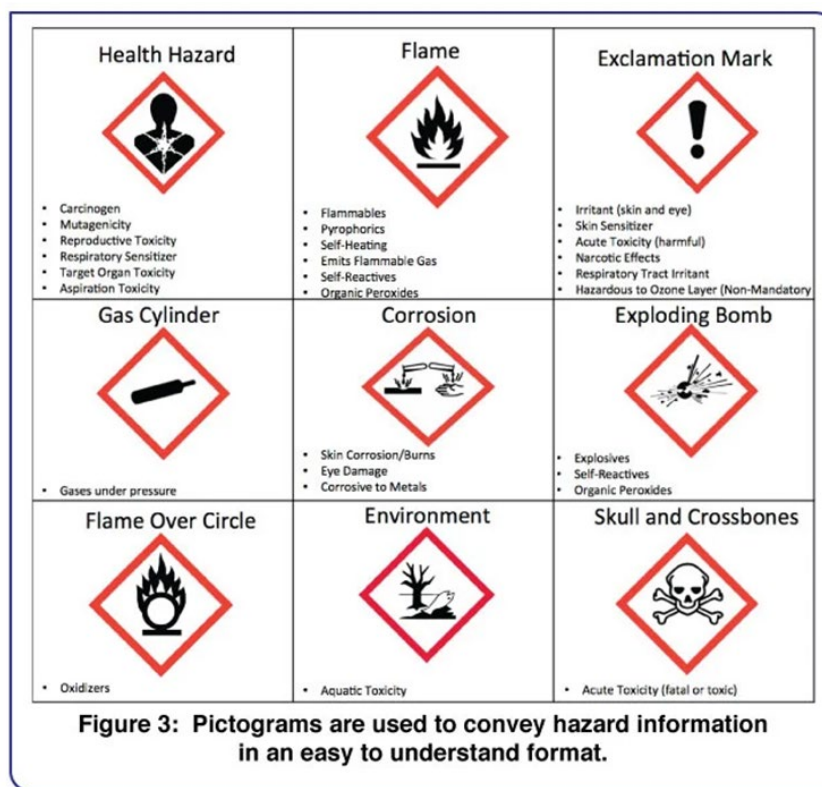
“Exposure” means that “an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.) and includes potential (e.g., accidental or possible) exposure.” Additional training is provided whenever a new hazard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

Information and training are critical parts 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 and 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 our established protective measures.

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, are 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).



CHEMICALS

To help with the safety of our employees, we have provided a list of chemicals that are not allowed for use by our employees in the workplace, whether in a Client's home or an office.

Not for use

- Bleach
- Clorox
- Any corrosive cleaners in powder or liquid form or aerosol. Wipes containing bleach are acceptable to use in the workplace.

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 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 workers' compensation costs, making us less competitive in our industry.

Injured employees will be offered modified duty jobs/tasks with the concurrence of their treating physicians and following all applicable laws and regulations where possible. We want to provide productive and necessary work consistent with good medical care and 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 must then provide the signed waiver 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 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 total productivity as soon as possible.
- The employee's performance shall be monitored to ensure they do not exceed the restrictions the treating physician defines.
- Employees will remain assigned to the modified duty position until they are released for whole duty or sign saying they no longer want to do light duty or are no longer progressing with their treatment.

MODIFIED DUTY CRITERIA

Job modifications involve analyzing the workplace's 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 significant 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 how to work in a safe and healthy office environment. This includes the safe use of office equipment.

PURPOSE

This procedure aims 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 integral to office and building safety and is covered in the Emergency Action Plan. All employees are responsible for complete familiarity with evacuation procedures, including knowing the emergency exits from any Company site where they may find themselves.

GENERAL OFFICE SAFETY

Many 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
- Wrong 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 maintaining exits free from obstructions. Employees can help eliminate most slip, trip, and fall hazards by keeping the office floor free, neat, and clean.

SLIP, TRIP, AND FALL

Slips, trips, and falls are among the most common injuries that occur in the workplace. These injuries may be preventable if employees pay attention to their surroundings, follow reasonable 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 line should be secured to the floor with cable 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 slivers 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.
 - Keep your fingers away from the operating parts when using or filling staplers.
 - 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

Standard 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 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 machines that smoke, spark, shock, or appear defective.
- 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, and 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.

ELECTRICAL SAFETY

Electricity is essential to the operations of a modern automated office as a power source. Electrical equipment used in an office is potentially hazardous and can cause severe shock and burn injuries if improperly used or maintained. Electrical accidents usually occur because of faulty equipment, unsafe installation, or equipment misuse by 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 device into each receptacle outlet at a time.
- If outlets or switches feel warm, shut off the circuit and have them checked by an electrician.

- Avoid using “cube taps” and other devices connecting multiple appliances into a single receptacle when possible.
- 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. Every electrical appliance, tool, computer, and entertainment center component we use is powered through one. We plug in and forget about it, assuming all our power needs will be met. And that’s true if we follow some simple but essential 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.
- Check for any hot or discolored outlet wall plates. Look from across the room; sometimes, you’ll see a darkened area around and above the outlet in a teardrop shape 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 their power cord. A machine can look in good operating order and still represent a hazard if its cord is damaged.

- Ensure all power 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 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.
- Ensure 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 only temporary solutions, yet most homes have at least one extension cord plugged in and left in place. Continual use can cause the insulation to deteriorate rapidly, creating a dangerous shock and fire hazard. In addition to the same safety tips that apply to power cords, remember the following principles 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 indicates that you have too few outlets to address your needs. Have additional outlets installed where you need them?
- Ensure extension cords are properly rated for their intended indoor or outdoor use 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 adequately rated for the appliance being connected to it. For example, if your appliance indicates that it operates five amps at 125 volts, its wattage rating is 625 watts (5 amps X 125 volts).

Power Strips and Surge Suppressors

Power strips allow us to plug more products into the same outlet, which can help but also hinder safety if misused. 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 course also likely still serves various 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, remember these safety principles 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, all the other outlets on the circuit, and the light fixtures on the circuit.
- A heavy reliance on power strips indicates 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 significant wave from outside sources like lightning or problems along the power lines to the office or house. In the event of a substantial 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 protect 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 considerations may include furniture, such as file cabinets, shelves, ladders, chairs, and desks.

- File cabinets:
 - Secure weighted file cabinets.
 - Bolt either to the floor or the 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 file cabinet drawers can be opened simultaneously, 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 entirely 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.
 - Place heavy objects on the bottom shelves.
 - Ensure a space of at least 18 inches between the top shelf items and the ceiling to allow ceiling sprinklers to function correctly 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 step stool to reach any item above their extended height.
 - Employees are not to use vertical or extension ladders, only those classified as stepladders.
 - A stepladder means a self-supporting, portable ladder with a fixed height, flat steps, and a hinged back.
 - A stepstool includes only those ladders with a fixed height, do not have a pail shelf, and do not exceed 32 inches (81 cm) in overall size to the top cap.
 - Never use a makeshift device, such as a desktop, file cabinet, or bookshelf, as a substitute ladder or stool.
 - Do not climb higher than the second tread from the top of the step ladder.
- Step Stools (Positioning):
 - Never use a step stool in front of a door unless the door is locked and barricaded.
 - Keep areas around step stools clean and free from debris.

- Place step stools firmly and evenly on the ground or floor.
- Place step stools on slip-free surfaces, even if they have slip-resistant feet.
- Secure the step stool if a slip-free surface is not available.
- Ensure the step stool is sitting straight and secure before climbing.
 - Never use step stools that are pitched backward on an incline.
 - Never use step stools that lean sideways due to surface conditions and
 - Build the surface with firm material if one foot sits in a low spot.
- Never make a step stool reach farther by setting it on boxes, barrels, bricks, blocks, or other unstable bases.
- Never load a stool above its intended weight capacity.
- Read and follow all warning stickers.
- Never use broken or damaged step stools.
- Never try to move a step stool while anyone is on it.
- Never overreach from a step stool or lean too far to one side.

OFFICE AND CLIENT'S HOME ERGONOMICS

Proper ergonomic positioning and consideration can help prevent repetitive stress injuries 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 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 the Safety Department at 877-532-8542

