



WestCare Foundation, Inc.

And All Subsidiaries and Affiliates

Health & Safety Plan

Note:

WestCare regions may add an addendum to this Health & Safety Plan when regulations, certifications, licensure, or accreditation require.

WestCare

Health & Safety Plan

<u>Table of Contents</u>	<u>Page #</u>
Overview	3
Organizational Commitment and Involvement	3
Safety Committee	3
a. Structure and Responsibilities	3
b. Inspections	4
c. Emergency Response Plan Tests/Drills	4
d. Meetings, Assistance, Meeting Minutes	4
e. Agenda	5
Training	5
Hazard Communication Standard/Right to Know	5
Infection/Exposure Control	6
Pest Control	6
Transportation Services	7
Inspections – External and Internal	7
Emergency Medical Care	8
Security	8
Accident/Incident Investigation and Reporting	8
Recordkeeping Procedures	9

WestCare has several training courses, individual policies, procedures, and plans associated with the materials in this Health & Safety Plan.

- Training - *E-Learning courses* – OSHA Fire Safety, Incident Reporting, WestCare Safety Modules: Fire & Safety; Dealing with Disaster; Man-Made Disasters; Driver Safety, WestCare Bed Bug Prevention/Treatment; OSHA: Globally Harmonized System – Revised hazard Communication Standard; Active Shooter; OSHA Bloodborne Pathogens: *Classroom courses* – CPR and First Aid, Verbal De-escalation: *Webinar courses* – EOC System Inspection
- Policies/Procedures – Incident Reporting Policy, Administrative Record Keeping Management System, Universal Precautions, Vehicle Maintenance & Transportation, Medication Use, Crisis Intervention & Prevention, Aggression Control, Vehicle Incident Protocol & Reporting Policy
- Plans - Emergency Response Plan, Environment of Care Plan, Infection Control Plan

Overview

This document outlines WestCare's plan to create and maintain a safe and healthy environment for all persons employed at, residing in or visiting our facilities or being transported in our vehicles.

This plan outlines the general guidelines for those areas or functions where personal health and safety are concerned. It encompasses policies, plans, and protocols that have been developed separately but relate to and have an effect on this plan's overall implementation. All WestCare policies and other related Health and Safety documents are available to staff on the Intranet. Together, they define the primary tenets of creating and maintaining a safe and healthy environment. Prevention of accidents is the core principal behind every concept in this plan and all related policies and procedures.

This plan will be reviewed annually and updated periodically to adjust to changes in regulation or practices that affect our services. This process will include staff and management input, as well as mandates and recommendations from regulatory, certifying and accrediting agencies.

Organizational commitment and involvement

The success and effectiveness of this plan relies on staff members at every level fulfilling their individual roles and responsibilities. WestCare Foundation and WestCare's administration and management are committed to insuring that the necessary policies and procedures are in place and that all staff members are properly equipped and thoroughly trained. Supervisors and line personnel are responsible to insure that they are familiar with their specific duties and responsibilities and are able to properly execute them. This health and safety plan has been incorporated as a standard of practice for WestCare.

Safety Committee

Each major location of WestCare shall establish a Safety Committee. If it is a smaller WestCare location then they should have at least one staff member participate in the National Operations subcommittee for OSHA/Safety. It shall conduct a meeting at least quarterly and minutes shall be taken. It will determine needs and review policies and procedures to recommend improvements to our workplace health and safety program and to identify corrective measures needed to eliminate or control recognized health and safety hazards.

Structure and responsibilities include:

Responsibilities: A person from the Safety Committee shall be appointed by the Vice President and/or Area Director to act as chairperson and also to participate in the National Operations monthly calls as well as their subcommittee for OSHA/Safety and shall attend all monthly calls. The person so designated shall share the subcommittee minutes and discussions with the entire program staff before the next monthly meeting.

Safety Committee tasks include: promoting safety committee participation; providing safety and health education and training; and reviewing and providing recommendations for updating workplace safety rules, policies and procedures, ensuring that all six (6) ER Drills and EOC inspections are performed annually.

Inspections: The Safety Committees ensure that WestCare wide Spring/Fall semi-annual inspections outlined in the Environment of Care Plan are performed and the corrective actions taken and entered into the Intranet system.

Emergency Response Plan Tests/Drills: The Safety Committees and/or member attendees attending the Safety/OSHA as well as local Management shall ensure that all Emergency Response drills required annually and that fire drills are conducted monthly per state regulations. All information on Emergency Drills is outlined in the ER Drill Procedures, also found on the WestCare Intranet and reviewed annually. The Emergency Drill Procedures also contain extra information for review prior to each emergency drill event.

Assistance: The Safety Committee shall:

- a. Assist management in reviewing and updating workplace safety rules and reviewing employee reports of unsafe conditions or work practices.
- b. Promote safety and health awareness and co-worker participation in the workplace safety program.
- c. Participate in safety trainings and assist management in monitoring workplace safety education and training to ensure that it is effective and that it is documented.

Meetings, Minutes: Safety Committees shall meet at a minimum of once during each quarter. Minutes of the meeting shall be completed and maintained, and include at a minimum the following:

- Date, time and location of meeting
- Persons attending the meeting
- Action items from the previous meeting
- Tasks assigned - Actions to be completed by next meeting & designated person to take action

Next scheduled meeting, date and location. All original minutes should be maintained in the Health & Safety Committee Binder and/or electronically and available for licensing and accreditation audits/surveys.

Safety Committee Meeting Agenda: The following items should be included on the agenda:

1. **National Operations Committee**— Report of monthly calls information- Safety/OSHA Sub-Committee, Pest Control, Vehicles
2. **Emergency drills** – review of completed emergency drill summary sheets for each location
3. **Environment of Care** – review of most recent inspection findings and corrective action taken.
4. **Vehicles** -
 - a. Vehicle Binders & Supplies – all vehicles; verify checked at least quarterly by

member of this committee

- b. UA Forms – always immediately if vehicle accident
5. **External inspections** – Review of most recent inspections conducted by Fire, Health Dept., OSHA, etc.
6. **Accident, Incident, Injuries**- review most recent reports
7. **OSHA** – discussion on requirements and compliance
8. **Training** – review all safety training, including E-Learning, life safety courses, driver's courses
9. **Other safety related issues** -

Training

To have an effective Health and Safety program it must be driven by informed, knowledgeable and capable employees. WestCare employs a variety of teaching/learning methods including self-guided online resources, classroom lectures and participatory drills. All employees will receive training on health and safety topics that includes this plan as well as related policies and procedures. Training starts with new hire orientation followed by recurrent annual training and additional training sessions as required to changes in areas effecting health and safety. Training in health and safety topics are scheduled and coordinated by WestCare Foundation and Regional leadership.

Once employees are assigned their job tasks at their assigned location, they may receive additional training on health and safety issues unique to their work site and/or job positions.

Individual employees may be re-trained after a work related injury caused by an unsafe act or if an unsafe work practice is observed.

Copies of all health and safety related documents, policies and procedures are readily available to staff on the WestCare Intranet. All health and safety training attendance is documented and maintained in the WestCare tracking system.

These are some of the trainings, but not limited to:

- *E-Learning courses* – OSHA Fire Safety, Incident Reporting, WestCare Safety Modules: Fire & Safety; Dealing with Disaster; Man-Made Disasters; Driver Safety, WestCare Bed Bug Prevention/Treatment; OSHA: Globally Harmonized System – Revised hazard Communication Standard; Active Shooter; OSHA Bloodborne Pathogens:
- *Classroom courses* – CPR and First Aid, Verbal De-Escalation:
- *Webinar courses* – EOC System Inspection

Hazardous Materials

WestCare employs a variety of chemicals in its daily operations. They are routinely used in facility cleaning, commercial kitchen ware washing/sanitizing and for maintaining the building and grounds. All of these chemicals are considered to be hazardous. WestCare has a comprehensive program to address the hazards that may be presented by these hazardous chemicals and provide the necessary resources and training so that personnel can safely use them.

The program includes 3 elements:

1. A hazard assessment process that in part, identifies the potential for exposure to chemical hazards for each job classification as well as the necessary administrative and engineering controls to mitigate exposure.
2. A Hazard Communication Plan (HAZCOM), as required by OSHA, to provide information and training to personnel regarding the identification and labeling of hazardous chemicals present in their workplace.
3. Safety Data Sheets (SDS) for all hazardous chemicals present at any facility are organized in a binder that is located where chemicals are stored or used.

All staff receive initial and recurrent training on HAZCOM as part of the overall health and safety training program.

Infection/Exposure Control

For all WestCare sites, good sanitation and hygiene practices are important to reducing human exposure to potentially infectious materials or communicable diseases.

Environments where people congregated in large numbers increases the chances that infections and diseases can be spread easily if basic sanitation and infection control techniques are not routinely practiced.

WestCare has adopted an Infection Control Plan that addresses the measures necessary to effectively control potential exposures to infections and diseases that persons may come into contact which may be picked up from casual contact, present in body fluids, those that become aerosolized and are airborne, or those that may be ingested such as those causing food borne illnesses. The plan addresses numerous prevention techniques including Personal Protective Equipment (PPE), universal precautions, handling bio-hazardous waste, and urine samples, and used hypodermic needles.

Pest Control

Pests are any insect, animal or reptile that create a nuisance, damage or destroy property or pose potential threats to humans through bites or stings or as carriers of disease. It is not uncommon for people to have a natural, and in some cases very strong aversion to pests. While all pests do not carry diseases or have a poisonous or allergic reaction producing venom, avoiding contact with all pests is the best practice.

Staff and clients are instrumental in helping to control pests by keeping exterior doors and windows closed to keep pests from entering the building. Exercising proper sanitation by reducing clutter will help eliminate places for pests to hide and keeping food out of all areas except the kitchens and eating areas will reduce the attraction that food provides.

Any holes or other penetrations through exterior walls that would allow pests to enter the building must be reported so that these access points can be sealed. Regular service will be performed by a professional pest control service to create a chemical barrier to insects. Our residential programs have a unique exposure to bed bugs. Bed bugs are nuisance pests and enter our facilities as hitchhikers on peoples clothing and in personal belongings. Procedures

are in place to help us avoid having these particular pests enter our facilities and they should be strictly adhered to.

There may be occasions where pests can create an emergent situation. Some examples would include close proximity to occupied areas of- swarming bees or wasps, poisonous reptiles or wild animals. These situations may pose immediate threats to staff or clients and immediate action must be taken to isolate the persons from the threat and call the appropriate personnel or agency to handle the problem.

Transportation Services

WestCare provides transportation services to clients in many of its programs. Staff members who have driving responsibilities are screened and authorized during the hiring process by Human Resources. All driving infractions are to be reported to Human Resources by employees for Human Resources consideration of continued ability to operate WestCare vehicles. Only personnel who receive authorization from WestCare's insurance carrier are permitted to drive WestCare vehicles. All driver's receive training on WestCare operating procedures, vehicle maintenance, and safety measures in case of an accident and/or road emergency.

Inspections

Outside Organizations

All WestCare programs and locations are inspected by a variety of external entities ranging from regulatory agencies such as health departments, fire departments, building departments, code enforcement and OSHA, to funding agencies, accrediting organizations and independent inspectors. These inspections may be scheduled or unscheduled. If deficiencies are noted on any inspection performed by an external agency, a corrective action plan is developed to address the deficiencies noted and completion of those corrections filed along with the inspection report and forwarded to the relevant agency. If required, changes are made to the plans, policies or procedures to address the concern. Any time an inspection occurs a WestCare Incident report must be completed, as well as a Supervisory Review, and in some cases a Follow Up report may be required.

Internal Inspections

WestCare has adopted a program for comprehensive periodic inspection of facilities and operations called the Environment of Care (EOC) Plan. This plan covers the following areas: general safety, fire and life safety systems, security, hazardous materials, infection control, utilities, medical equipment, and commercial kitchen operations. It includes evaluations of the physical features of each campus and how the staff performs their daily operational tasks in that environment. EOC inspections are done from a clinical perspective to keep our facilities, staff and operations in compliance with governing agencies such CARF and HIPPA. This inspection program notes deficiencies, scores the campus' compliance rates and has a corrective action plan that must be completed for noted deficiencies. This inspection is performed twice annually, in March and again in September. **EOC inspections are to be completed by facility directors or supervisors, not maintenance personnel.**

In addition to the EOC inspection program, maintenance staff perform an additional bi-annual inspection call an Operational Site Inspection (OSI) This inspection is done from a maintenance perspective of the facilities and takes a more in-depth look at the functionality and condition of the facility including, HVAC system, generators, electrical, fire alarm, etc. This inspection is done opposite of the EOC's and are due in June and January. The OSI is only to be completed by maintenance or FitzHouse staff. Reports are kept at each campus and deficiencies addressed in the same manner as the EOC and external inspections.

Emergency Medical Care

All direct care program staff are trained in basic First Aid and CPR at initial hire and refresher training as required by the First Aid/CPR Training Agency, either bi-annually, annually or semi-annually. WestCare provides readily accessible first aid supplies at every site and in vehicles. These supplies are commensurate with occupancy numbers and hazards. First Aid Kits are inspected monthly and restocked as required. All injuries or illnesses that are beyond the scope of staff capabilities and resources are referred to a higher level of care. If the situation is considered emergent, emergency medical services will be called via the 911 system.

Security

Insuring that uninvited and unwanted persons cannot enter any facility unannounced is paramount to maintain a secure environment for all occupants. Likewise, it is important for parties coming to our campuses on legitimate business have a central entry and exit point into the facility so they can be directed to or escorted to areas within the building. Depending on the type of program being offered, the level of security can range from a normal business office setting to a fully locked down and access controlled environment. Some sites are equipped with video surveillance and perimeter alarm systems or electronic lock access.

While most sites are in urban areas, some sites are in rural settings or remote areas. These settings provide unique challenges due to their location. We also operate programs in environments controlled by other entities such as prisons and detention facilities that have security procedures in place that must be observed. Ultimately, it is incumbent on all staff members to be aware of their surroundings to insure that a secure environment is maintained

Accident/Incident Investigation and Reporting

WestCare employs an online incident reporting system to report accidents and incidents where there is any injury to any person(s) or property damage. An incident report should be completed as soon as possible after the incident/accident has occurred, but no later than the end of the employee's shift.

For all incidents/accidents involving a WestCare vehicle. WestCare Incident Report is filed through WestCare's Incident Reporting system. In addition the driver of the vehicle should complete the Vehicle Incident Kit and submit to their immediate supervisor. Immediate supervisor is responsible for submitting the completed vehicle incident kit to the appropriate individuals.

All incidents/accidents involving employee injuries must also be reported to Human Resources and Human Resources will report it through State-specific workers' compensation procedures.

Any employee involved in a vehicle incident/accident and/or injury while on WestCare related business, or as part of assigned duties will be subject to a mandatory post-accident drug test immediately preceding the incident and/or accident. The immediate supervisor or human resources will provide the necessary documents needed for the designated laboratory.

Record Keeping

The OSHA 300, 301, and 300A logs are a comprehensive organized log(s) of injuries and illnesses that occur at each work site throughout the calendar year. Human Resource Managers are responsible for maintaining the 300, 301, and 300A logs throughout each year. Human Resources is responsible for ensuring that the 300 logs are posted at each applicable sites within his or her region for applicable time periods. Human resources is responsible for maintaining the logs for a minimum of five (5) years and continuously updating the stored copies at all applicable sites within his or her region(s).

A WestCare Incident is completed by the driver as soon as possible and given to the Director. A WestCare Incident Report is filed through WestCare's Intranet Based Incident Reporting system.

Injuries must also be reported to Human Resources and in the WestCare Incident Report System. Human Resources will report it through State-specific workers' compensation procedures.