SAFETY PROGRAM

Effective January 1, 2010
The management of this company is committed to take a most direct and serious interest in the areas of safe work practices and conditions. Employees have a right to expect a safe and healthy working environment and safe job methods and practices. We go to great lengths and to great expense to provide a safe working environment and workers compensation insurance for our employees. We deal promptly with meritorious and legitimate injuries and claims. On the other hand, we have extensive experience investigating and controverting fraudulent or malingering claims and we will fight these claims with all available resources.

If an injury occurs we have a Return to Work policy to allow an injured employee to resume work as soon as possible and we will accommodate any restrictions imposed by the treating physician. Early return to work has been shown to be the most effective way for a worker to rehabilitate and return to full duty. It also relieves the injured worker from the worry of missing wages.

It is our policy that the rules listed on the following pages be strictly observed at all times. A disregard of these rules is a violation of Company policy and will subject the employee to disciplinary action. Depending on the severity and/or frequency of the rules violation, disciplinary action may consist of a verbal warning, a referral for safety training, a written warning, suspension or termination. Remember, your help in preventing accidents benefits you and your fellow employees. We should all strive for a record of zero accidents.

The purpose of the safety committee is to bring workers and management together in a non-adversarial, cooperative effort to promote safety and health. The safety committee consists of management and employee representatives who have an interest in the general promotion of safety and health for the company. The committee is responsible to make recommendations on improving safety and health in the workplace. They have been charged with the responsibility to define problems and obstacles to loss prevention; identify hazards and suggest corrective actions; help identify employee safety training needs and to develop accident investigation procedures for our facility.
Safety Policy

Goal:

It is our desire and intention to provide and maintain for employees, a safe work area, safe equipment, and to establish and insist upon safe work practices by each employee throughout our facility. It is the firm and continuing policy that on-the-job accidents are to be reduced or eliminated by the use of every reasonable precaution.

General Responsibility:

It shall be the responsibility and a specific part of every employee’s job to work toward this goal regardless of the capacity in which he / she may function. Safety is a matter of individual attention to problems that may exist or arise, and of teamwork and communications to correct unsafe conditions immediately.

To accomplish this, it is our intention to initiate and maintain a complete accident prevention and safety program. Our safety and health program will include:

1. Providing mechanical and physical safeguards to the extent they are needed.
2. Conducting a program of safety and health inspections to find and eliminate unsafe working conditions or practices; to control health hazards, and to comply fully with the safety and health standards for every job.
3. Training all employees in good safety and health practices.
4. Providing necessary personal protective equipment where needed and instructions for its use and care.
5. Developing and enforcing safety and health rules; requiring that employees cooperate with these rules as a condition of employment and enforcing disciplinary action in the event of rules violations.
6. Investigating, promptly and thoroughly, every accident to determine cause and to correct the cause to establish measures to prevent reoccurrence.
7. To provide an early return to work program and light duty positions to assist an injured employee in their recovery.
8. Using an incentive system to reward safe work practices.

ACCIDENT PREVENTION REQUIRES THE FULL COOPERATION OF EACH AND EVERY EMPLOYEE

Accidents are avoidable, but only if each employee thinks about safety and proper techniques at all times. Accidents occur when employees do not take the time to think about what they are doing. We want all employees to think “Safety First” at all times.
General Safety Rules

1. All new employees are required to attend the first three safety committee meetings upon employment.
2. Employees will report all injuries immediately to their supervisor. No employee shall go to a physician or other medical practitioner for treatment of any work related injury without first talking to the Executive Director, except under absolute emergency conditions.
3. In the event of an on-the-job accident or injury the employee may be required to take a drug and alcohol test.
4. Cooperation in accident investigation is required by all employees.
5. Personal Protective Equipment (PPE) must be worn when required on specific jobs. Any deficiencies in the required protective equipment must be reported to the supervisor immediately.
6. No practical jokes, scuffling, contests of strength or other horseplay will be permitted.
7. A worker shall not operate a machine unless guard or method of guarding is in good working order, in place and operative.
8. The use of intoxicating liquor or drugs on the job or reporting work under the influence of intoxicants is prohibited.
9. Only authorized persons shall operate machinery or equipment.
10. All work areas must be kept clean. Each employee is responsible for cleaning up any hazards that he/she may create.
11. All employees shall correct any unsafe condition or practice to the extent of their authority.
12. If any employee does not have the authority to correct an unsafe condition or practice, he/she shall report it to a company official who has the authority to see that it is corrected.
13. Only clothing appropriate to the nature of the job may be worn. Canvas or similar sport shoes are prohibited.
14. Running is prohibited in and around the facility.
15. Report all defective equipment to your supervisor immediately.
16. All employees are strictly forbidden to ride on wheel chairs or any mobile equipment as passengers.
17. Always obey warning signs –WET FLOOR, etc.
18. Safety goggles must be worn when working with any caustic lines, or doing any hazardous cleaning of any sort.
19. When lifting, bend your knees and lift with your legs. Reverse the procedure when putting heavy objects down. Never try to lift excessive loads by yourself. GET HELP
20. Gait belts are used for all transfers, except when mechanical lift is indicated or it is noted in the care plan that the resident has requested non-use of gait belts.
21. Machinery shall be kept free of excessive oil and grease.
22. No employee shall use a tool or piece of equipment for any purpose for which it is not suited, nor shall he/she abuse the tool or piece of equipment by straining it beyond its safe working load.
23. No employee shall knowingly violate any safety law or regulation.
24. If you are ever in doubt about a safety procedure, consult your supervisor immediately.
25. No employee shall remove, deface or destroy any warning and/or danger signs, or barricade, or interfere with any other form of accident prevention device.
Gait Belt Use Policy

Back injury incidents have decreased 90% in facilities utilizing Gait Belts.

Throughout our company we require all staff involved in lifting, transferring, or ambulating residents to use transfer (gait) belts. Failure to do so will result in disciplinary action. The belt is a safety device to protect both the resident and staff member; it increases the comfort and safety of the transfer and ambulation activities. The transfer belt is worn by the resident/client at the center of gravity which is at the lower lumbar area of the back just below the waist area, this offers balance control. The belt is placed firmly around the waist, providing something to “hang onto” when lifting or moving the resident and allows for greater control.

Transfer:

Place your hands on both sides of the gait belt at the center of the back and grasp with hands at the top of the belt. Stand facing the person and using good body mechanics (use your legs, don’t stoop), shift your weight with the resident’s weight to transfer. During transfer it is beneficial to let the patient stand one minute for the Achilles tendon to stretch and allow for lower extremities circulation.

Ambulation:

Use the same technique as a transfer with one hand grasping the top of the belt between the resident and the belt. Your other hand can be used to balance shoulders and support the forearm.

Two Person Transfer:

The belt is easily used rather than grasping at the armpit. Arm and leg transfers can be harmful to many of our residents, especially stroke patients and those with painful shoulders.

Belts are to be worn by each person at all times during the complete shift, and used with every transfer unless a mechanical lift is indicated or the resident/client has requested non-use of gait belt and it is documented in the service plan.

All employees who provide care to clients/residents are required to have a gait belt. Please do not leave them lying about in patient rooms, on linen carts, etc. The transfer belt must be readily available in the event of an emergency.

The directive to wear gait belts at all times includes while working in the dining room.
Substance Abuse
Ageia Health Services has a strong commitment to its employees to provide a safe, healthy and productive environment and to promote high standards of employee health. Consistent with the spirit and intent of this commitment we have established the Drug Free Workplace Policy regarding drugs and alcohol abuse. If you encounter personal or job related problems resulting from excessive or illegal use of alcohol or drugs, you are encouraged to seek counseling and treatment through an appropriate counseling or medical facility. If you are unable to maintain satisfactory work performance and professional conduct, you will be subject to disciplinary action, which may include termination.

Personal Protective Equipment (PPE)
Ageia Health Services is committed to protecting the health and safety of its employees, who are at risk for exposure to blood and Other Potentially Infectious Materials (OPIM), by requiring them to wear Personal Protective Equipment, in accordance with Occupational Safety and Health Administration (OSHA) standards.

DEFINITIONS
1. Personal Protective Equipment (PPE)
   PPE is specialized clothing or equipment that provides protection against exposure to blood-borne pathogens. For example:
   - gloves
   - face shields
   - eye protection
   - resuscitation bags
   - plastic aprons
   - masks
   - mouthpieces
   - pocket masks

2. Pathogen
   A pathogen is a “germ” that causes disease in another organism.

PROCEDURES
1. Employees shall always practice standard, precautionary measures including:
   a. utilizing proper hygiene and cough techniques when they have a respiratory infection i.e.:
      i. cover nose and mouth when coughing or sneezing;
      ii. use a tissue or the sleeve of clothing to cough or sneeze into;
      iii. use a tissue to blow the nose;
      iv. dispose of used tissues immediately;
   b. avoid touching the eyes and mouth after the hand has been in contact with high traffic areas, such as doorknobs or handrails;
   c. wash hands with regular soap and hot water or with an alcohol-based hand rub:
      - after having contact with respiratory secretions;
      - after contact with contaminated objects; and,
      - before handling or eating food.
2. Employees shall be provided with necessary PPE.
3. If PPE is necessary, it must be used correctly.
4. Each employee shall demonstrate their knowledge of training received and their ability to use PPE appropriately, before being permitted to conduct job duties, which require the use of PPE.
5. Employees are not required to wear PPE when conducting routine client care providing they only conduct activities, which involve touching the client’s skin e.g. assisting a client to walk.
6. Employees are responsible for wearing PPE to prevent infections in themselves and other individuals.
7. Wash hands thoroughly with soap and water as soon as possible after removing any PPE.

**Bloodborne Pathogens**

All employees of Ageia Health Services are required to practice *Universal Precautions* and other infection control measures in accordance with guidelines established by the Occupational Safety and Health Administration (OSHA), the Center for Disease Control and Prevention (CDC) and the State Health Department when providing direct care to clients to minimize the chance of contracting and transmitting infections.

**DEFINITION**

Blood-borne Pathogens

Blood-borne pathogens are germs (bacteria, virus etc.) that can cause a blood-borne disease. These pathogens are found in infected human blood and certain other body fluids, particularly semen and vaginal secretions. They may be passed from person-to-person, with any exposure to infected blood or infected body fluid. Blood-borne pathogens include, but are not limited to the Hepatitis B Virus (HBV), the Human Immunodeficiency Virus (HIV) and the Hepatitis C Virus (HCV).

**PROCEDURES**

All employees are required to complete the training program on Bloodborne Pathogens

Employees shall:
1. utilize *Universal Precautions* in the performance of their duties;
2. report the details to the Supervisor whenever they notice another employee is not following *Universal Precautions*;
3. follow Ageia’s policies specific to personal protective equipment (PPE)
4. treat all body fluids and materials as if they are infectious;
5. make every effort to protect themselves from splashes, sprays and other means that could expose them to infectious diseases;
6. apply established engineering controls;
7. follow the controls for good work practices;
8. recognize and adhere to work restrictions based on infection control concerns;
9. report health symptoms and/or exposure to any blood-borne or infectious disease to their Supervisor immediately;
Safety Bingo

In an effort to encourage and reward safety in our company, we have implemented a Safety Bingo Program. Upon hire each employee (excluding the Executive Director, Assistant Director or Business Office Manager and Director of Health Services) will be issued a Safety Bingo card. The card shall have the employee’s name and date of hire written on the back. New workers may only use Safety Bingo numbers drawn from their first workday on. This same card will be used throughout the course of employment until the employee gets a bingo.

Monday through Friday a Bingo number will be drawn. The number of the day will be drawn by 10 a.m. and posted in the break room and on the company’s Facebook page. The daily number will not be given out over the phone. The jackpot starts at $10.00 and each accident free day that a number is drawn, the jackpot will increase by a set amount until someone gets a bingo. The facility Safety Bingo Administrator (usually the Executive Director or BOM) will contact the Safety Bingo Administrator at the home office to verify the numbers on a potential winning card. If it’s a winner, the employee wins the amount in the jackpot on the day his/her final winning number was drawn. In fairness to NOC shift employees, the Safety Bingo Administrator will keep the potential winning card until the following morning to give NOC shift time to check their cards. In the event of a tie, the employees will split the jackpot evenly.

Check your Safety Bingo Card every weekday to see if you are a winner. An employee who turns in a card that would have been a winner after the jackpot has been paid out loses the opportunity to win or share in that jackpot.

Winning bingo cards will be faxed to the corporate office. A new round of bingo will begin the next week day. The employee will be issued a new bingo card immediately upon determination that their card is a winner and may begin playing the next bingo round.

If an accident occurs, the current bingo game will end and the jackpot will be re-set to $10.00. A new game will begin the next week day. Since this program is designed to increase safety awareness and reward safe work practices, any employee who suffers a work related injury is not eligible to participate in Safety Bingo until they are back at work and released to full duty. An employee who is unable to work or who is on light or modified duty is ineligible for the game. An injured employee who returns to full duty is eligible to begin participating in the next round that begins after his/her return to regular duty.

Jackpot winners will be paid in cash if possible.

If an employee loses his or her bingo card, they may obtain a new one from the Safety Bingo coordinator (usually the office manager or Executive Director). The employee’s name and the current date will be entered on the back of the card and only numbers drawn from that day forward may be used. The previous card becomes void. If the lost card is found after a new card is issued it may not be used.

Upon termination of employment, all rights to participate in Safety Bingo end. The employee’s bingo card will be void and may not be given to another employee.
Employee Injury and Return to Work Procedure

Our goal is to have each employee go home healthy and injury free at the completion of his or her shift. Ageia Health Services has developed a return-to-work program designed to return workers to employment at the earliest possible date following a workplace injury or illness. This program applies to all workers.

Light Duty
Ageia Health Services defines “light duty” work as temporary modified work assignments within the worker’s physical abilities, knowledge, and skills.

The physical requirements of light duty work will be provided to the attending physician. Light duty positions are then developed with consideration of the worker’s physical abilities and the business needs of the company.

Employee responsibilities

Accident reporting
- All work-related accidents and injuries must be reported immediately to your supervisor and the Executive Director.
- If an injury occurs, the injured employee is to consult with the facility nurse, preferably in person or by telephone if necessary. The phone number for the community’s Nurse is located at the Nurse’s station. The Nurse will assess the illness or injury and help the worker to determine if outside medical treatment is necessary.
- If the injury does not require medical treatment beyond first aid, the supervisor should immediately be informed so that an accident/incident analysis can be completed. First-aid treatment is available on-site from the Nurse or Med Aides.
- If medical treatment is necessary, the Executive Director (or their designee) will transport the injured worker to the clinic. In the event of a serious or life threatening injury or illness, the ED or their designee will accompany the worker to the emergency room.
- The worker must fill out a workers’ compensation form (form 801 or the tri-fold return to work brochure).

Worker’s physical condition
- If professional medical treatment is sought, the worker must inform the attending physician that we have a “No Time Loss” philosophy and a return-to-work program with light duty/modified assignments available.
- We will accommodate any restrictions the doctor feels is necessary to allow you to work.
- The worker or Executive Director will provide the treating physician with a Release to Return-to-Work form and completed Job Description. This must be returned to the Executive Director following the initial medical treatment.

Worker able to return to work
- If the attending physician releases the worker to return to work, as evidenced by completion of a Release to Return-to-Work form and Job Description Form, the form(s) must be returned to The Executive Director within 24 hours for assignment of light duty/modified work. The worker must report for work at the designated time.
- The worker cannot return to work without a release from the attending physician.
If the worker returns to a light duty job, the worker must make sure that he or she does not go beyond either the duties of the job or the physician’s restrictions. If the worker’s restrictions change at any time, he or she must notify his or her supervisor and Executive Director at once and give the Executive Director a copy of the new medical release.

At a minimum, the worker will attend the next three (3) Safety Committee meetings. Meeting attendance will continue until the worker is released to full duty.

Worker unable to return to work
- If the worker is unable to report for any kind of work, the worker must call in at least weekly to report medical status.
- While off work, it is the responsibility of the worker to supply the Executive Director with a current telephone number (listed or unlisted) and an address where the worker can be reached.
- The worker will notify The Executive Director within 24 hours of all changes in medical condition.
- After each medical appointment, the worker will return the Release to Return to Work form and any other medical documentation to the Executive Director within 24 hours.

Employer responsibilities

Accident reporting
- The supervisor or Director will conduct an accident analysis on all accidents, regardless of whether an injury occurs.
- When an injury requiring professional medical treatment occurs, the Executive Director or designee will transport the injured worker to the medical facility.
- The Executive Director will forward a completed workers’ compensation form to the insurance carrier within 24 hours of knowledge of the injury or illness.
- All information will be entered on the KPD Risk Solutions website. www.kpdinsurance.com
- Other information will be forwarded as soon as developed, including:
  - Name of worker’s attending physician
  - Completed Release to Return-to-Work Form from attending physician and medical documentation, if appropriate
  - Completed transitional/modified or regular Job Description
  - Job Offer letter and responses
- At the time of first medical treatment the Release to Return-to-Work form must be completed and returned to The Executive Director. If one is not, The Executive Director will request one from the attending physician.
- The ED will notify the insurance carrier of any changes in the worker’s medical or work status as soon as possible.
- A copy of all documents will be e-mailed or faxed to Ageia’s workers compensation manager at the corporate office.

Post-Accident Testing
- An employee who is involved in a job-related accident may be subject to a substance test to determine if drug or alcohol use was a factor causing the accident. The employee will be required to submit to testing for the detection of drugs and/or alcohol, unless we conclude at the onset that the employee’s action or inaction was clearly not a factor causing the accident. This determination will be made by the supervisor responsible for completing the report and investigating the incident.
Job Offer Letter

- Upon receipt of a signed light duty/modified Job Description form from the attending physician, a written Job Offer letter will be prepared by the employer. It will be mailed to the worker’s last known address by certified and regular mail or presented to the worker in person.
- The letter will note the doctor’s approval and will explain the job duties, report date, wage, hours, and location of the transitional assignment.
- The worker will be asked to sign the bottom of the Job Offer letter indicating acceptance or refusal of the offered work assignment.
- Copies of the Job Description, Work Releases, and Job Offer letters will be forwarded to the insurance carrier and faxed or e-mailed to the corporate worker’s compensation manager.
- When the employee’s restrictions change, present a new job offer letter reflecting the changes.

The Team

It is critical that the injured worker, the employer and physician stay in constant communication and work as a team to get the injured worker back to full duty as soon as possible. We value our employees and need everyone working at full capacity.