

The Sech-Kar Company Policies and Procedures

Adopted 7/1/88

Last revised 10/16/2020

Statement of Purpose

Our mission is to assist Individuals who have developmental disabilities:

1. To live in their chosen communities,
2. To be as independent as possible,
3. To participate in activities and relationships that they choose and enjoy, and
4. To be viewed as productive and valued members of their communities.

PERSONNEL

The Sech-Kar Co. is committed to fair, clearly stated, and supportive relationships between the company and its staff. The personnel policies of The Sech-Kar Co. have been established to provide a guide to the personnel practices of The Sech-Kar Co. and to ensure consistency of personnel decisions. It is the intention of The Sech-Kar Co. to administer the personnel programs in a manner that complies with the letter and spirit of all applicable federal, state, and local regulations. This document is designed to provide guidance to staff at The Sech-Kar Co. It is not a part of any contract between The Sech-Kar Co. and its employees. It is only a set of guidelines for personnel practices. Notwithstanding the provisions of the personnel policies, all employees are "at will employees" which means that they may be terminated at any time with or without cause without subjecting The Sech-Kar Co. to a claim for breach of an employment contract.

Equal Employment Opportunities Policy

In the hiring of employees, contractors, and suppliers, The Sech-Kar Co. does not discriminate on the basis of race, sex, color, creed, national origin, marital status, sexual preference, or handicap.

Discrimination Complaint Resolution

Any employee who believes that he or she has been the subject of discrimination because of his or her race, color, national origin, religion, age, gender, sexual orientation, or handicap has the right to file a discrimination complaint with The Sech-Kar Co. and to have the complaint heard by the Deputy Administrator who is the Equal Employment Opportunity Officer of the agency.

The hearing of employee complaints of discrimination shall follow procedures set forth by the Ohio Department of Administrative Services and shall be conducted by The Sech-Kar Company.

Employee Reasonable Accommodation

The Sech-Kar Co. will provide reasonable accommodation for the known physical or mental handicaps of otherwise qualified applicants for employment as well as current employees, unless the accommodations would cause undue hardship to The Sech-Kar Co. or jeopardize the health and safety of Individuals.

Handicapped applicants will be interviewed regarding their background and experience for the Personnel Policies and Procedures

job in question, using the same interview format as is used for non-handicapped applicants. Pre-employment medical examinations or pre-employment inquiry into the nature and severity of an applicant's handicap is not practiced unless it is practiced for all applicants. However, inquiry into the person's ability to perform job-related functions is permitted after the applicant's other qualifications for the position have been established.

Reasonable accommodation to a known handicap will be made on a case by case basis and may include job restructuring, part-time or modified work schedules, use of modified or assistive equipment, making facilities that are used by the handicapped employee accessible or similar accommodation that will not impose an undue hardship on The Sech-Kar Co.

Pre-Employment Requirements

Prior to employment, applicants may be required to have a high school diploma or GED, valid Ohio driver's license and car insurance, background check completed by the State of Ohio and/or the FBI, Driver's abstract completed by the OBMV, First Aid and CPR training, and testing for use of illicit drugs. Management will conduct checks of registries listed in Ohio Revised Code rule 5123:2-2-02 for each employee. These registries include but are not limited to the abuser registry, nurse aid registry, and sex offender registry. Employees may also be required to submit to a physician's clearance and additional drug testing.

Training in topics will be provided specific to the type of services the employee will be performing. Employees providing Home and Community Based Personal Care Services, working in Licensed Homes, providing Adult Day Supports, providing Non-Medical Transportation, providing Supported Employment Services, providing Career Planning, or providing Vocation Habilitation Services shall receive the pertinent training set forth in Ohio Revised Code Section 5123. All employees who may be required to administer medications shall attend and pass the requirements for Medication Administration outlined in Chapter 5123:2-6 of the Ohio Revised code as well as CPR and First Aid training. All employees shall receive any pertinent training identified in the Ohio Revised Code rules.

Shared Living contractors and other contractors who are not employees of The Sech-Kar Co. shall be required to secure the same trainings as determined by The Sech-Kar Co. and meet most of the same requirements as required by DODD rules for employees.

Probationary Period

New employees will be placed on a 90-day Probationary Period beginning on the first date for which paid hours are claimed by that employee. The Administrator or his designee may terminate the employment of the employee for any reason during the Probationary Period.

If there are issues noted with the probationary employee which are correctable a written plan of correction may be presented to the employee detailing what the performance or conduct issues are and how they should be addressed.

Each new employee may be assigned a Mentor (an existing employee) who will be available during the probationary period to discuss questions or concerns of the new employee. The Mentor will make initial contact with the new employee.

Each new employee will be trained or provide proof of current certification or previous training on Individual Rights, MUI/UI Rule, CPR/First Aid, Medication Administration, and company Policy and Procedures. Each employee is expected to follow all company policies and procedures.

At the conclusion of the employee's Probationary Period, a meeting with the Administrator or his designee may be held to review the employee's performance and conduct.

Current employees who act as Mentors will receive a stipend of \$25 at the end of the new employee's probationary period.

Any new hire employed for 90 days with no disciplinary actions given and working an average of 30 hours per week shall receive a \$250.00 bonus. After 180 days of averaging 30 hours per week from first employment with no disciplinary actions given, that same employee shall receive an additional \$250 bonus. Any currently employed staff who refers a new employee shall receive a \$100.00 bonus. These bonuses will be given upon the completion of the new hires 90-day probationary period.

Personnel Records

The Sech-Kar Company will keep a personnel file for each employee. Personnel records may include, but not be limited to:

Tax Forms I-9, IT-4, and W-4
Hepatitis B Information--Consent/Decline
Confidentiality Policy
Job Description
Who Benefits Information
Policies and Procedures Information
Individual Rights Information
Probationary Period Policy
Drug Screen (as required by DODD rule)
E-Mail Policy
Driver's Abstract
Driving Record Addendum
Application/References Checked and Recorded
Employee Addendum
Copy of Driver's License
Proof of Vehicle Insurance

Copy of High School Diploma or Equivalent
CPR/First Aid Training
Medication Administration
Background Check
Abuser Registry Notice
Permission to do Registry Checks
Mentor Agreement
Life Insurance Information
Health Insurance Information
Signed Master Signature Log
Training Logs
Completed Training Packet (UI-MUI/Individual Rights/Orientation)
Mentor Agreement (those hired after 8/1/13)

Staff are required to keep mandatory trainings, certifications, and personnel records current and complete. Failure to respond to a management member request to complete or update necessary personnel records in a timely manner may result in disciplinary action.

If an employee was given reasonable notice of and agreed to attend training for which The Sech-Kar Co. paid and then the employee did not attend the training, the cost of the training will be deducted from any future pay bonus that the employee might have received. This will include Medication Administration, CPR, First Aid, and other trainings. If the employee cannot attend for a valid reason, the employee must notify office personnel a reasonable period of time prior to the training. "Valid Reasons" can include the inability to get a replacement if you are scheduled to work during that time or a serious prior commitment.

The Sech-Kar Co. does pay an employee's hourly rate for any training attended. Contracted personnel, such as Shared Living contractors, are not paid for attending any training.

Employee Background Checks

A background check is required of each employee as per Ohio Revised Code rule 5123:2-2-02 and will comply with these requirements regarding the employment of persons convicted of a disqualifying offense.

Drug Testing

Employees or applicants may at any time be required by the Administrator or his designee to submit to a test for use of illegal drugs.

- Staff will have privacy (use of a bathroom) if a urine sample is required.
- If tested positive, staff will have the opportunity to go to a lab for a second test at the expense of the employee. If the lab test is found to be negative, then the employee shall be reimbursed for the cost of the lab test.
- Staff may need to provide proof (either the prescription or the pharmacy bottle with label) of any medications they are currently taking.
- Staff will be tested on suspicion of illegal drug use and when needed during an

investigation (For example, staff could be tested if medications are missing from an Individual's home).

- Employees will be terminated if the initial test and the lab test are both positive for non-prescribed substances. Employees could be rehired if an approved drug rehab class is completed and the employee tests negative after thirty or more days.

Compensation

The Administrator or his designee shall negotiate hourly wages or salaries individually with each employee.

Personal Time

To qualify for paid Personal Time, staff must be scheduled to regularly work at least 30 hours per week.

Eligible hours of work for which Personal Time shall accrue include regular work hours, On-Site/On-Call (overnight sleep) hours, overtime hours, and holiday hours worked. Personal Time shall NOT accrue during use of Personal Time hours. All new hires will start accruing personal time after their 90 days of probation have ended.

For the first three years of employment, qualifying staff shall receive 0.0196 hours of Personal Time for each eligible hour of work. That is equivalent to 40 hours of paid Personal Time for working 2040 hours.

On the third anniversary of continuous employment, qualifying staff shall receive 0.02767 hours of paid Personal Time for each eligible hour of work. That is equivalent to 56 hours of Personal Time for working 2024 hours.

On the fifth anniversary of continuous employment, qualifying staff shall receive 0.04 hours of Personal Time for each eligible hour of work. That is equivalent to 80 hours of paid Personal Time for working 2000 hours.

Personal Time may be used for any reason (i.e., sick leave, vacation, bereavement, etc.), but care should be taken to not disrupt the operations of The Sech-Kar Co.

Medical Insurance

Employees regularly scheduled to work 30 or more hours per week are eligible to participate in The Sech-Kar Company Medical Insurance. Eligibility begins the first full month after the employee has averaged working 30 or more hours each week for 60 days. The insurance premium will be deducted from the employee's paycheck. It is the employee's responsibility to complete and return to the company's medical insurer all necessary paperwork in a timely manner.

Short Term and Long-Term Disability Insurance

Employees regularly scheduled to work 30 or more hours per week are eligible to participate in The Sech-Kar Company Short Term and/or Long-Term Disability Insurance. Eligibility begins the first full month after the employee has worked 30 or more hours each week for 60 days. The

insurance premium will be deducted from the employee's paycheck. It is the employee's responsibility to complete and return to the company's medical insurer all necessary paperwork in a timely manner.

Dental and Vision Insurance

Employees regularly scheduled to work 30 or more hours per week are eligible to participate in The Sech-Kar Company Vision and Dental Insurance Plans. Eligibility begins the first full month after the employee has worked 30 or more hours each week for 60 days. The insurance premium will be deducted from the employee's paycheck. It is the employee's responsibility to complete and return to the company's medical insurer all necessary paperwork in a timely manner.

Life Insurance

All Employees who regularly work 30 or more hours per week are eligible to participate in The Sech-Kar Co. Life Insurance Plan. The Sech-Kar Co. will provide up to \$15,000.00 of life insurance (less if the employee is age 65 or older) beginning 90 days after hire. It is the employee's responsibility to complete and return to the company's life insurer all necessary information in a timely manner. Voluntary life insurance may also be purchased by the employee through The Sech-Kar Company.

401K Retirement Plan

Employees regularly scheduled to work 30 or more hours each week are eligible to participate in The Sech-Kar Company 401k Program. This eligibility begins after the employee has been working 30 or more hours each week for one year. Contributions of up to 3% of each employee's gross pay will be matched by The Sech-Kar Company. Contributions are not taxed until money is withdrawn from the 401k. Please refer to 401k Plan Enrollment Guide for more information.

NOTE: A minimum number of hours worked is necessary to qualify for various benefits (As of 1/11/2018 a minimum of 30 hours worked per week are required for all Short/Long Term Insurance, Life Insurance, Dental/Vision, and 401k, Medical Insurance, and Personal Time).

Holidays

Residential Staff Holidays

Staff regularly working in residences shall have the following holidays:

- New Year's Eve beginning at 6 p.m.
- New Year's Day
- Easter Sunday
- Memorial Day (the State of Ohio declared Monday)
- Fourth of July
- Labor Day (the State of Ohio declared Monday)
- Thanksgiving Day
- Christmas Eve beginning at 6 p.m.
- Christmas Day

Staff who work on any of the company holidays will receive 150% of their hourly wage for each

hour worked on that day including OS/OC (overnight sleep) hours.

There are occasions when New Year's Day, Fourth of July, and Christmas Day fall on a Saturday or Sunday and the offices or Adult Day Service sites are closed on Friday or Monday.

Residential staff will receive 150% of their hourly wage only on the actual holiday and not on the Friday or Monday when the offices or ADS sites are closed.

Staff who use paid Personal Time on a holiday will receive their normal hourly wage for those hours of paid Personal Time.

Office and Adult Day Services (ADS) Staff Holidays

Office staff and ADS staff have the following holidays:

- New Year's Day
- Memorial Day
- Fourth of July
- Labor Day
- Thanksgiving Day
- Christmas Day

If hourly office or ADS staff are needed to work on those holidays, they will receive 150% of their regular hourly wage on those days. If salaried staff work on those holidays, they will receive one hour of Paid Leave for every hour they work on those days.

Memorial Day and Labor Day will always be acknowledged as company holidays on the Mondays that are declared as holidays by the State of Ohio.

Thanksgiving Day will always be acknowledged on its traditional Thursday.

When New Year's Day, Fourth of July, and Christmas Day fall on a Monday through Friday, the holiday will be acknowledged on that day. When New Year's Day, Fourth of July, or Christmas fall on a Saturday or Sunday, the Administrator shall declare either Friday or Monday as the company holiday for purposes of office staff and ADS staff.

Office staff and ADS staff are expected to work on Christmas Eve and New Year's Eve. Office staff and ADS staff are not expected to receive any company benefit from Easter since Easter is celebrated on a Sunday.

ADS Closings

If an ADS site is closed because of weather or for some other decision of the ADS site director, ADS staff will not be paid unless they report to work. Staff must first get approval from the ADS Director before reporting to work on days that the ADS site is not open. They will be expected to be productive while they are being paid. If ADS staff do not report to work on those days, they will not be paid for those days unless they choose to use Personal Time.

Overtime

Hourly employees shall receive 150% of their regular hourly wage for each hour over 40 worked

each week. Overtime hours must be assigned and/or approved by the Administrator or his designee prior to being worked.

Schedules

The workweek begins at 12:01 AM Sunday and ends at midnight the following Saturday. Each employee shall work as scheduled by the Administrator or designee. Staff shall notify the Administrator or designee as soon as possible when unable to report for work as scheduled.

Reporting to Work

If the employee cannot come to work as scheduled, the employee is required to contact the supervisor, Home Manager, or On-Call person. If he/she is unavailable, the employee must contact the office or a co-worker to make sure that services will still be provided.

If the employee fails to show up to work as scheduled or notifies a supervisor so late as to greatly affect the ability to secure replacement staff, that employee may face disciplinary action.

On-Site/On-Call (a.k.a. Overnight Hours, O/N Hours, Sleepover Hours, or OS/OC)

Each employee may be required to sleep at an Individual's residence. The employee shall be paid a wage rate determined by the Administrator for night hours scheduled as "sleep hours" unless the employee during those "sleep hours" is required to provide service to an Individual. For those "sleep hours" that the employee is awake and providing service to an Individual, the employee shall receive his/her hourly wage. If the employee does not have at least five hours sleep time, the employee shall receive his/her regular hourly wage for all "sleep hours". Employees shall not have visitors during the OS/OC hours, typically 10:00pm until 6:00am.

Each employee should only charge regular hours between the hours of 10:00 p.m. and 6:00 a.m. if there are health and safety reasons to do so. An Unusual Incident report needs to be filed or a very good explanation attached to the time sheet if the employee is claiming regular hours during this time. The employee shall not claim regular hours just because the Individual is awake.

Vacations for Individuals

Prior to any serious vacation discussions with an Individual, staff should get the approval from a supervisor. Any vacation must be discussed with the Individual's Team, including the County Board.

When an employee accompanies an Individual on a vacation or other event which requires staying overnight, paid hours shall be negotiated with staff depending on the needs of the Individual.

Individuals' vacations should result in no additional expenses for the company. Vacations must be structured so that expenses above and beyond the normal expenses associated with providing services to that Individual are paid by the staff or the Individual.

County Board staff and the Team will need to be involved in the planning if Individuals will be paying for rooms, travel, meals, tickets, etc. All receipts spent on a vacation should be kept for either the agency or the client.

Meetings and Trainings

The cost of all required trainings is paid for by The Sech-Kar Co. and time spent at all required meetings and trainings is considered work time and are paid as normal work hours. Unexcused absences from mandatory meetings or trainings are grounds for disciplinary action.

Time Sheets

(NOTE: Time Sheets and Billing Sheets must reflect the EXACT times worked—i.e., not to the nearest 15 minutes.) Time Sheets must be completed accurately and in a timely manner and must corroborate the employee's Documentation and Billing Sheets. Time Sheets are due at the office no later than Noon on the Monday of pay week. Employees who repeatedly turn in Time Sheets and Billing Sheets late may be disciplined, including possible termination. Occasionally, Time Sheets may be due at an earlier time, particularly to accommodate holiday schedules.

Time Sheets must accurately reflect the time the employee spent working. If the employee leaves in the middle of a shift to do personal errands and return to work, the time spent doing personal errands should not be included on the Time Sheet. If the employee arrives late or leaves early, the Time Sheet should reflect this. The employee shall identify on the Time Sheet, the individual person or people who received services during that day or time period.

Weekend Bonus

All awake hours (not OS/OC or sleep hours) worked with an Individual beginning at 6:00 p.m. on Fridays and ending at 10:00 p.m. on Sundays shall be eligible for a Weekend Bonus of an additional \$0.50 per hour worked. The employee must complete a Weekend Bonus form and submit it for payment. Weekend Bonus forms must be submitted for payment no more than one month after the end of the month in which the weekend hours were worked. As an example, if you want to claim the Weekend Bonus for hours worked in February, they must be submitted before the end of March.

Behavior Add-On

If staff are providing H/PC services (i.e., residential services) to an Individual who has an identified Behavior Add-On, that staff shall be paid \$1.00/hour in addition to their normal rate for the awake H/PC hours worked with that Individual. This add-on does not apply to OS/OC hours, nor does it apply to hours worked in an ADS program.

Competency Add-On

Any staff person who qualifies for the Competency Add-On shall be paid \$1.00/hour in addition to their normal rate for the awake H/PC hours worked. This does not apply to hours worked in an ADS program, nor does it apply to OS/OC hours.

Reimbursement of Expenses

All reasonable, necessary, and legal expenses incurred by staff in the performance of their duties shall be eligible for reimbursement provided that the expenses are verified with receipts or other proof and that the Administrator or designee was aware of the event that necessitated the expenses.

Any expense expected to cost more than \$10 must be pre-approved by the Administrator or designee prior to incurring the expense.

The employee shall be reimbursed for limited meals at the following rates: Up to a maximum of \$5.00 for breakfast or lunch (prior to 4:00 PM) and up to a maximum of \$6.00 for supper. Exceptions to this policy may include special events or required trips outside the local service area and require approval of the Administrator. The employee may seek reimbursement for only one meal per week per Individual and no more than two total in a week while working with Individuals.

Similarly, each staff person may only be reimbursed for one activity with each Individual per week.

The employee shall be reimbursed for travel expenses that occur while transporting Individuals in their own vehicles. A Mileage/Expense Reimbursement form is used for this purpose. All claims for use of personal vehicles or expense reimbursements must be made by the end of the month following the month in which the expenses occurred.

Transportation Policies

Employees are to never transport friends or family in a company vehicle. Company vehicles are to be used to transport Individuals only or for work purposes pertaining to The Sech-Kar Company. Each employee shall provide the Administrator with a proof of current automobile insurance coverage in conformance with Ohio law for each privately owned vehicle that the employee uses for The Sech-Kar Company business. The employee must be listed as a driver on their insurance. If the employee is not on the insurance card, they must provide a Declaration of Insurance page from their insurance company. The declaration page must state that they are listed as a driver on that policy.

The Administrator shall require each employee to cooperate in securing an abstract of the employee's driving record from the Ohio Department of Motor Vehicles. Accumulating six or more points on your driving record results in the employee's inability to transport Individuals and may result in reduced hours depending on the transportation needs of the Individuals served. An additional abstract from the Ohio Department of Motor Vehicles will be required every three years.

Each employee may be required to use the employee's private vehicle for The Sech-Kar Company business including transporting Individuals. In general, employees should use company-owned vehicles when they are available. For residences with an assigned vehicle, reimbursement for using personal vehicles will not be made unless accompanied by an explanation as to why the company vehicle was not available at the time. If a company vehicle and a personal vehicle are to be used at the same time, the company vehicle should be used for the longer trip.

When using personal vehicles on behalf of Individuals or the company, the employee shall be reimbursed for each mile driven. The employee shall also be reimbursed for necessary, related, and verified expenses such as tolls and parking. All mileage and related expenses requested for reimbursement shall be dated and documented with travel points, odometer reading, and purpose of trip.

Employees shall not be reimbursed for travel from their home to the first site where they will conduct The Sech-Kar Co. business, nor will they be reimbursed for travel from the last site where The Sech-Kar Co. business is conducted, to their home.

Each employee is required to follow the applicable motor vehicle laws when using any vehicle for The Sech-Kar Company business including cell phone usage.

Company Vehicle Sign Out Procedure

When using a company vehicle, the employee will record their name, date, and length of time they will be using the vehicle on the Vehicle Sign/Out Sheet posted in that county's office.

Staff are expected to keep vehicles clean, maintained, and with adequate fuel in the tank when they are done using the vehicle. Additionally, staff must report any accidents or mechanical problems with the vehicle.

Vehicle Key Return Procedure

When returning a company vehicle key, the key needs to be physically handed to an office staff so it can be recorded and put away. If a vehicle key is lost it will be the responsibility of the last person to check out that vehicle to replace the key at their own expense.

Fines on Duty

Any employee receiving a fine or citation while on duty (examples include speeding, parking, and jay walking, among others) shall be solely responsible for paying the fine or properly meeting the requirements of the citation. Individual exceptions may be granted by the Administrator only when extraordinary circumstances exist beyond the control of the cited staff.

Firearms and Weapons

Employees are prohibited from bringing firearms or other weapons to any Individual's home, to any property owned or controlled by The Sech-Kar Co., or to transport firearms or weapons in any vehicle owned by The Sech-Kar Co.

Staff Appearance

Employees are expected to dress neatly and appropriately for the anticipated activities. Employees are expected to follow hygiene and dress practices that are not offensive to Individuals, other staff, or the public. Additionally, employees should dress appropriately depending on the Individuals they may be assisting.

Resignation

Any employee of The Sech-Kar Co. may resign by submitting a letter of resignation to the Administrator or Deputy Administrator at least ten working days prior to the effective date of the resignation.

At the time of the effective date of the resignation, the employee shall be able to use any accrued Personal Time, or the employee shall be paid for all unused Personal Time. Failure to follow the resignation procedure may result in the loss of payment for unused Personal Time. Any employee who resigns and then returns to work may be considered a new employee and may need to complete appropriate trainings and paperwork. A re-evaluation of the employee's benefits accrued while working before resignation will be discussed upon rehire.

Employee Disciplinary Procedure

Discipline and/or termination may result for many reasons including, but not limited to, inappropriate conduct and/or unsatisfactory performance.

Harassment Policy

It is the belief of The Sech-Kar Co. that employees are the primary means by which the goals and objectives of The Sech-Kar Co. will be met. To that end, the rights of all employees must be respected. All employees of The Sech-Kar Co. must understand the position on harassment. By definition, harassment is any unwanted attention or action in the workplace or on social media that creates an intimidating, hostile, or offensive work environment, including sexual harassment. The procedure for reporting and dealing with this very sensitive issue is as follows:

1. If a person's behavior makes an employee uncomfortable, the employee should feel free to immediately advise the person that, in the employee's opinion, the behavior is inappropriate and that the employee would like it stopped.
2. If the employee is not comfortable discussing the issue with the person, or if the person fails to respect an employee's request, the employee should report the incident to a supervisor or the Deputy Administrator.

In all instances, a prompt, thorough, and fair investigation will take place, giving careful consideration to protect the rights and dignity of all people involved. The Sech-Kar Co. will take those steps it feels necessary to resolve the problem, which may include verbal or written reprimand, suspension, or termination.

No retaliation of any kind will occur because an employee has in good faith reported an incident of suspected harassment. The Administrator or Supervisor to whom the complaint was made will work to establish mutually agreed upon safeguards against retaliation while attempting to mediate any harassment complaint.

Employee Dispute Resolution

An employee who does not agree with a decision, practice, procedure, or policy of The Sech-Kar Co. should first attempt to resolve the issue directly with the employee's immediate Supervisor. If the issue cannot be resolved with the immediate Supervisor, the employee should submit in writing or email to the Administrator the specific complaint in detail and the change or remedy the employee seeks.

Inappropriate Conduct

Inappropriate conduct is defined as including, but not limited to, misbehavior on the job; refusal to do work reasonably expected; bringing, using or being under the influence of alcoholic beverages or illicit drugs at work; wrongful use of or taking of company or Individual property; conviction of a felony; falsification of documents; smoking in an Individual's home, while transporting Individuals, or in company vehicle; discourtesy to Individuals, co-workers, the public; failure to work as scheduled; neglect or carelessness; non-cooperation with co-workers; posting on social media (i.e., Facebook, Twitter etc.) of writing and/or photos of things detrimental to The Sech-Kar Company, Individuals or staff of The Sech-Kar Company; sharing Individuals' information on social media without appropriate Personnel Policies and Procedures

releases; or violation of any policies or practices of the company.

Unsatisfactory Performance

Unsatisfactory performance means failure of an employee to meet performance standards, to complete tasks in a timely, competent way, or to maintain an adequate attendance record. Uncooperative behavior or negative attitudes that affect the work or morale of others may result in termination.

The disciplinary policies and procedures are designed to provide a structured corrective action process to improve and prevent a recurrence of undesirable behavior and/or performance issues. The Sech-Kar Company reserves the right to combine or skip disciplinary steps (steps outlined below) depending upon the facts of each situation, the severity of the infraction, and the nature of the offense. The level of disciplinary intervention may also vary. Some of the factors that will be considered depend upon whether the offense is repeated despite coaching, counseling and/or training, the employee's work record and the impact the conduct and performance issues have on The Sech-Kar Company, Individuals, or other employees.

If corrective discipline is warranted, the following list of actions may occur:

Verbal Counseling

The immediate Supervisor, Trainer, or County Coordinator will verbally bring to attention the existing performance, attendance or conduct issue. The Supervisor should discuss the nature of the problem or violation of company policies and procedures. The Supervisor is expected to clearly outline expectations of performance. Supervisors are encouraged to document dates and times of occurrences in order to facilitate better communication with the employee, but no written record of verbal counseling will be kept in the employee file.

Written Warning

A written warning involves a more formal documentation of the performance, conduct or attendance issues and consequences. The Administrator's designee(s) will meet with the employee and review additional instances or information about the issues and develop a Corrective Action Plan. The Administrator's designee will outline consequences of the employee's continued failure to meet performance and/or conduct expectations. These meetings with the Administrator's designee may usually result after two to three instances of verbal counseling by the immediate Supervisor. Written record of these meetings will be kept in the employee file.

Recommendation for Termination of Employment

Generally, The Sech-Kar Company will try to exercise the progressive nature of this policy by first providing verbal and written warnings before proceeding to a recommendation to terminate employment. However, The Sech-Kar Company reserves the right to combine or skip steps depending upon the circumstances of each situation and the nature of the offense. The Administrator's designee may recommend termination of employment to the Administrator. Each termination of employment must be approved by the Administrator or designee. At the discretion of the Administrator, any

employee facing termination for unsatisfactory performance (as defined above) may be given the option to resign as described in the above section under Resignation.

Suspension without Pay

There may be performance, conduct or safety incidents so problematic and harmful that the most effective action may be the temporary removal of the employee from the workplace. When immediate action is necessary to ensure the safety of Individuals or others, the Administrator may suspend the employee pending the results of an investigation. Pay may be restored to an employee if an investigation into the infraction absolves the employee.

Appeal Process

Employees will have the opportunity to challenge any decision of the Administrator's designee (including Written Warnings, Suspensions, and Termination) by appealing the decision to the Deputy Administrator. The purpose of this process is to provide insight into extenuating circumstances that may have contributed to the employee conduct and/or performance issues while allowing for an equitable solution. The employee may present this information during any meeting with a Supervisor or management or more formally to the Deputy Administrator when there is a pending recommendation for termination of the employee.

After following the above procedure, the employee may appeal a disciplinary action to the Administrator for final disposition.

SERVICE DELIVERY

Non-Discrimination for Individuals' Services

The Sech-Kar Company will provide services to all eligible Individuals equally, without regard to race, color, national origin, religion, age, gender, sexual orientation, or handicap, in accordance with the determined needs of the individual.

There is no distinction made in determining eligibility for services or in the manner of providing services because of race, color, national origin, religion, age, gender, sexual orientation, or handicap.

All persons and organizations having occasion to refer or recommend Individuals to this agency are advised to do so without regard to the Individual's race, color, national origin, religion, age, gender, sexual orientation, or handicap.

Individual's Discrimination Complaint Resolution

Any qualified Individual who believes that he or she has been the subject of discrimination because of his or her race, color, national origin, religion, age, gender, sexual orientation, or handicap has the right to file a discrimination complaint with The Sech-Kar Co. and to have the complaint heard by the Administrator.

Parents, guardians, or advocates may act on behalf of the Individual and may assist the Individual in seeking a resolution to the complaint. The agency will inform the complainant of his or her rights.

The resolution of Individual's complaints within the agency shall provide for a period of counseling or negotiation between the agency and the complainant in an attempt to resolve the complaint prior to any formal proceedings. Guidelines for hearing complaints shall be provided by the agency and are based on the Comprehensive Civil Rights Plan of the Ohio Department of Developmental Disabilities.

Initiation of Services

The decision to provide services to an Individual will begin with a referral from the appropriate County Board of DD. Requests for services initiated by an Individual or guardian will be referred to the appropriate County Board of DD. An interview will be arranged with the Individual and/or guardian and County Board staff. If The Sech-Kar Co. is able to provide services and if the Individual is interested in receiving services from The Sech-Kar Co., then a decision to provide services will be made.

Termination of Services

Services will be terminated for an Individual in any of the following circumstances:

The Sech-Kar Co. cannot meet the Individual's needs.

The Individual's general welfare would benefit from having services terminated.

The Individual no longer wants or needs services from The Sech-Kar Co.

The health or safety of employees or other Individuals is endangered by the continuation of services to that Individual.

Services to other Individuals are severely impaired by continuing services to a particular Individual.

In the event of termination, The Sech-Kar Co. will strive to maintain continuity of care for Individuals with subsequent service providers.

Individuals' Rights

Staff shall provide care for Individuals consistent with the trainings provided by The Sech-Kar Co. and the rights of Individuals as set forth in the Ohio Revised Code 5123.62. *See attached Form # 1*

Individual's Dispute Resolution

If an Individual does not agree with a practice, procedure, or policy of The Sech-Kar Co., or if an Individual believes that his/ her rights have been violated, the Individual or the Individual's advocate or guardian may file a complaint with the Administrator. When possible, the complaint should be filed in writing, clearly stating the reason for the complaint. The Administrator shall respond within seven calendar days of the complaint being filed (*and include, if necessary, a plan of action to be taken to remedy the complaint*) and communicate this to the Individual and, if appropriate, the advocate or guardian.

If the Individual does not feel the complaint is resolved, the Individual or the Individual's

guardian or advocate may contact the appropriate County Board of DD and the Ohio Department of DD.

Internal Quality Assurance Policy and Procedures

The Sech-Kar Co. shall work with the Individuals, County Board staff, Adult Day Service providers, families, and The Sech-Kar Co. employees to address any health or welfare concerns regarding an Individual.

The Sech-Kar Co. Trainer or designee shall conduct training for The Sech-Kar Co. staff following initial hire and then annually. (See sections labeled “Pre-Employment Requirements” and “Personnel Records” in these Policies for more detail on training requirements.) The Deputy Administrator, Trainer, or designee reviews each employee’s Training Record to ensure all required trainings are met. A memo is then sent to each employee detailing needs to be met for continued employment. New employees are given sufficient hours of training directly with the Individual and another experienced and trained employee present.

The Deputy Administrator or a designee reviews the UI/MUI tracking records for each Individual at least monthly. The date of each review is recorded on the tracking record. The Deputy Administrator or a designee completes an annual review of all MUIs, or as required by DODD rule. Copies of all MUI reviews are sent to the UI/MUI contact at the appropriate County Board. If a trend/pattern occurs, contact is then made between the Deputy Administrator or a designee and County Board UI/MUI contact to ensure that each incident’s resolution continues to guarantee health and safety for each Individual if needed.

All ISP documentation records are reviewed by the Deputy Administrator or designee to check for proper documentation of hours/days worked with each Individual and to ensure the needs of each Individual, as identified in their Individual Service Plan, are met.

Monitoring Individuals’ Health and Welfare

In a timely manner, Staff will report to the Administrator or designee any concerns they have regarding an Individual.

The Administrator or designee shall be available to meet informally with each Individual to directly hear any concerns.

Service Plan meetings or Team reviews shall be held at least annually. At such time, concerns of the Individual or advocate will be addressed.

A Registered Nurse shall meet at least annually with each Individual to whom The Sech-Kar Co. staff dispense medications or perform delegated health services, or as health needs arise with each Individual to monitor the person’s general health.

As stated in the Individual Service Plan, each Individual shall receive appropriate health services from health care professionals.

The Sech-Kar Co. shall work with County Board staff and health care professionals to address any health or welfare concerns regarding an Individual.

Immediate Medical Assistance

When employees are working, they are expected to be knowledgeable enough to know if an Individual needs immediate medical assistance. When working with an Individual, employees are responsible for that Individual's health and safety. Employees should not be afraid to call 911. Staff should use their best, reasonable judgment in emergency situations.

Seeking Medical Assistance through Home Health Services

When Staff are working with an Individual receiving Home Health Services from a Home Health Agency, the Staff shall contact the Home Health Agency for assistance with all medical situations, OTHER THAN SITUATIONS REQUIRING IMMEDIATE MEDICAL ASSISTANCE. If Staff is unable to speak with a Registered Nurse from such agency within 30 minutes of contacting the Home Health Agency, Staff shall then follow guidelines outlined in the DODD Medication Administration course for seeking medical assistance. Staff will then document the events via Unusual Incident reporting.

Staff will remember to:

First, ensure the health and safety of the Individual;

Second, contact the Home Health Agency and/or The Sech-Kar Co. R.N., and

Third, complete the required Unusual Incident forms and reporting requirements.

Medical Consultation Guidelines

Staff should assist an Individual to consult a medical professional when the Individual requests to be seen by a medical professional or when the injury or illness warrants professional medical attention. In assessing whether professional medical attention is warranted, staff should follow the guidelines established by the Ohio Department of DD in the Observable Signs and Symptoms of Illness and Injury #: 28-6-05. *See attached Form #2 (Health and Safety Alert #28-06-05).*

Incidents Adversely Affecting Health and Safety Major Unusual Incidents

CATEGORY A INCIDENTS: Accidental or Suspicious Death, Exploitation, Failure to Report Misappropriation, Neglect, Peer to Peer Act, Physical Abuse, Prohibited Sexual Activity, Rights Code, Sexual Abuse, Verbal Abuse

CATEGORY B INCIDENTS: Attempted Suicide, Medical Emergency, Missing Individual, Death other than and accidental or suspicious, Significant Injury

CATEGORY C INCIDENTS: Law Enforcement, Unapproved Behavior Supports, Unscheduled Hospitalizations

CATEGORY SUMMARIES: All MUIs require an investigation. The following agencies will investigate incidents by category.

Category A: Alleged Crimes (Police, CSB, and IA involvement)

Category B: Investigative Agent (County Board or COG)

Category C: Sech-Kar Company Investigative Agent (Format Requirements) ^[1]_{SEP}

All **Major Unusual Incidents** must be reported to the Administrator or his designee as soon as the employee is aware of the incident and has taken all reasonable steps necessary to ensure the Individual's health and welfare. The appropriate law enforcement authorities shall be notified by staff immediately should it appear that a felony has occurred, and staff shall document the date, time, and name of the person notified. Information of this nature shall be noted on incident report. ^[1]_{SEP} When the incident is considered major in scope, or medical treatment of an Individual or employee is deemed necessary, the County Board on-call staff shall be notified as soon as possible. Should abuse or neglect of an Individual by an employee be suspected, that employee shall be removed from direct care until the administration completes an internal investigation. ^[1]_{SEP} The employee must submit a written report to the administration no later than 3:00PM that same day or by 10:00 AM the day after the incident occurred (if the MUI occurs late in the day or night). The report will be reviewed by the administration to establish that reasonable measures taken to ensure the Individual's health and safety continue to be implemented, and that the report does not contain confidential information. If the incident involved more than one Individual, separate written reports for each Individual will be submitted. The administration will also determine if additional steps are needed to prevent recurrence of the incident. The administration will submit the employee's written report(s), and the Administrator's written report(s) concerning actions taken by him/her to resolve the incident to the County Board by 3:00 PM the next working day after the incident.

In the event that the Individual is not his/her own legal guardian, the administration shall notify the Individual's guardian of the incident within twenty-four hours. All efforts to contact the guardian will be documented by the administration, and will be made available to County Board staff, if requested.

The Sech-Kar Company may conduct an internal investigation and submit the written report to the County Board within 14 calendar days of the incident's occurrence. The Sech-Kar Company will cooperate with and provide appropriate information for investigations by the County Board, DODD, governing council (SOCOG, MEORC) and any other investigative agent as appropriate. Should the County Board request a review of a personnel file of an employee relevant to the investigation, the following information will be deleted from all forms: Medical and insurance records, Worker's Compensation records, immigration status forms (I-9), and Social Security Numbers. The Sech-Kar Company will permit a review of, but not copies of, the performance evaluations, professional licenses, disciplinary records, criminal records checks, and correspondence regarding status of employment. The County Board may copy only training records, time sheets and work schedules of employees.

The Sech-Kar Co., after receiving a written report of investigation, twenty days after occurrence of incident, may refute the findings of the investigation and request another investigation by

another County Board, or investigative agent.

The administrative staff shall review all MUIs and UIs on a regular basis to:

1. Determine that all reasonable steps were taken to ensure health and safety of the Individual,
2. Identify trends and patterns of MUIs, and take corrective action when needed,
3. Identify series of MUIs that have occurred that warrant further action to provide protection to the Individual and prevent further MUI's from occurring.

The administrative staff will also review MUIs as required by rule and submit a written report to County Board when required.

The written reports will also be submitted to DODD upon request. A yearly review will be conducted to address measures taken to ensure preventative actions are continuing to be implemented. A written report of the reviews, and steps necessary to prevent reoccurrence, will be included in the Individual's ISP.

In some cases, an employee may be suspended from work during the investigation of an MUI. This usually occurs in instances where there is an accusation of some form of abuse or neglect by the employee. The need for suspension will be determined by the Administrator of The Sech-Kar Company and the suspended staff will receive their regular pay for up to two weeks. Regular pay means payment for the regular hours typically worked but does not include payment for overnight hours. The Sech-Kar Company shall notify the county board of any changes regarding the suspension during an investigation. Once the investigation is complete, the employee shall return to work with or without further restrictions.

The Sech-Kar Company follows the rules and regulations for MUI investigations as set forth in Section 5123 of the Ohio Revised Code.

Unusual Incidents

“Unusual Incident” means an event or occurrence involving an Individual that is not consistent with routine operations, policies and procedures, or the Individual's care or service plan, but is not a major unusual incident. Unusual Incident includes, but is not limited to: dental injuries, falls; and injury that is not a significant injury; medication errors without a likely risk to health and welfare; overnight relocation of an Individual due to a fire, natural disaster, or mechanical failure; an incident involving two Individuals served that is not a peer-to-peer act, Major Unusual Incident, or rights code violations; or unapproved behavior supports without a likely risk to health and welfare. Other examples that may be UIs include incontinence, self-injurious behavior, an Individual having new possessions that are unexplained, and complaints about events that happened elsewhere (e.g., "Individual X was hitting me on the bus").

Any employee who becomes aware of an Unusual Incident (UI) must report it to the Administrator or his/ her designee by 10:00 AM of the following day. Written reports must be made no later than 24 hours after the incident occurred. The Administrator or his/her designee will review the report to ensure health and safety concerns were addressed.

The Administrator or his/her designee will keep a log for each Individual served to record Unusual Incidents. The Administrator or his/her designee will review the logs at least monthly to:

1. Ensure the health and safety of the clients;
2. Identify trends and patterns of UIs in order to implement procedures to provide corrective

action. The logs will be made available to the appropriate County Board and/or DODD upon request.

Trends and patterns to be identified are injuries, medication errors, verbal and/or physical aggressions toward peers, health issues, destruction of property, etc. A monthly analysis of UIs will be conducted by the Administrator or his/her designee to assess trends and patterns and to ensure corrective actions have been taken.

New employees will be trained on policies regarding MUIs and UIs and annually thereafter. The Administrators and his/her designees will seek training offered by the County Boards and/or DODD annually, or when changes occur.

Failure to comply with the above policies may result in disciplinary action and may include suspension or termination of employment.

Confidentiality Policy

Personal information staff receive about Individuals is privileged and confidential and, therefore will not be discussed outside the professional boundaries of The Sech-Kar Co. All employees will be trained on HIPPA procedures and a breach of said confidentiality is a violation of Individuals' rights and may lead to suspension or dismissal.

Individual Service Plan (a.k.a. ISP, IP, Individual Plan, Imagine Plan)

Staff shall provide, monitor, and document services according to the individual's ISP and the appropriate County Board of DD rules. The Administrator or his/her designee shall attend the service plan meeting as requested by the Individual or the County Board.

Adult Day Support (ADS)

The Sech-Kar Company will adhere to all applicable rules of the Ohio Department of Disabilities which enumerate the requirements for agency providers of Adult Day Support services including, but not limited to the following: 5123:2-9-17 and 5123:2-9-19.

These requirements shall include, but not be limited to:

Staff Training:

1. Eight hours of required training or OADSP DSPATHS CIP training
2. Mentoring
3. Written Training Plan for Staff
4. Maintaining a Written Training Record for Staff

Each Individual receiving ADS services shall:

1. Be approved for Medicaid Waiver services (Level 1, Individual Options, or other eligible Medicaid Waiver programs) or ADS services may be paid privately or using County Board funds.
2. Have a current Individual Service Plan.
3. Have a completed Acuity Assessment Instrument with an assigned Staff Intensity Group.
4. Documentation shall be recorded in conformance with accepted Medicaid standards.

Supported Employment-Community

The Sech-Kar Company will adhere to all applicable rules of the Ohio Department of Disabilities which enumerate the requirements for agency providers of Supported Employment-Community Personnel Policies and Procedures

services including, but not limited to the following: 5123:2-9-17 and 5123:2-9-19.
These requirements shall include, but not be limited to:

Staff Training:

1. Eight hours of required training or OADSP DSPATHS CIP training
2. Mentoring
3. Written Training Plan for Staff
4. Maintaining a Written Training Record for Staff

Each Individual receiving Supported Employment services shall:

1. Be approved for Medicaid Waiver services (Level 1, Individual Options, or other eligible Medicaid Waiver programs),
2. Have a current Individual Service Plan.
3. Have a completed Acuity Assessment Instrument with an assigned Staff Intensity Group.
4. Documentation shall be recorded in conformance with accepted Medicaid standards.

Vocational Habilitation

The Sech-Kar Company will adhere to all applicable rules of the Ohio Department of Disabilities which enumerate the requirements for agency providers of Vocational Habilitation services including, but not limited to the following: 5123:2-9-17 and 5123:2-9-19.

These requirements shall include, but not be limited to:

Staff Training:

1. Eight hours of required training or OADSP DSPATHS CIP training
2. Mentoring
3. Written Training Plan for Staff
4. Maintaining a Written Training Record for Staff

Each Individual receiving Vocation Habilitation services shall:

1. Be approved for Medicaid Waiver services (Level 1, Individual Options, or other eligible Medicaid Waiver programs) or Vocational Habilitation services may be paid privately or using County Board funds.
2. Have a current Individual Service Plan.
3. Have a completed Acuity Assessment Instrument with an assigned Staff Intensity Group.
4. Documentation shall be recorded in conformance with accepted Medicaid standards.

The Sech-Kar Co. offers Vocational Habilitation services to provide Individuals with learning and work experiences. These learning and work experiences help Individuals on their path to employment so that they will develop the skills necessary to obtain competitive integrated employment.

Such necessary skills may include the ability to communicate effectively with customers, co-workers, and supervisors; the ability to practice appropriate workplace conduct and dress; the ability to follow directions; the ability to stay on task; the ability to problem-solve; and safety in the workplace.

Staff of The Sech-Kar Co. shall assist and support these Individuals through vocational assessments; social integration; transportation; independent problem-solving; finding community resources and natural supports;

as well as training to maintain, enhance, and attain the skills and self-determination needed to transition for Vocational Habilitation to competitive integrated employment.

Behavior Support

The purpose of behavior support is to promote the growth, development, and independence as well as promote individual choice in daily decision-making, emphasizing self-determination and self-management. A behavior assessment is completed by the County Board prior to implementation of any written strategies to help identify the causes for a behavior and to determine the most appropriate teaching and support strategies. Behavior support programs will be used only with the consent of the Individual or the Individual's legal guardian. Use of strategies will be consistent with the guidelines established in ORC 5123:2-3-25 and require Individual Specific Training.

Individuals' Restraints

An Individual shall be restrained only in an emergency situation or on orders from a qualified physician when restraint is clearly in that Individual's best interest. Prone restraint is forbidden by the State of Ohio and considered physical abuse.

Behavior Intervention

A behavioral intervention shall be done only:

1. If called for in that Individual's plan,
2. If the method of intervention has been reviewed beforehand with the Individual, and
3. If the intervention is likely to bring about a positive change for the Individual.

Positive behavior support and less aversive teaching and support strategies are always to be used before more restrictive measures are taken. Behavioral interventions shall respect the Individual's rights and dignity and be consistent with the Individual's plan.

Policy for Disposition of Individual's Assets upon Death

Upon death of an Individual, the County Board and next of kin will be contacted to assist with disposition of assets. If the deceased Individual did not have a will, The Sech-Kar Co. will follow the laws of Ohio regarding the disposition of all assets. Legal advice will be sought from The Sech-Kar Co. attorney and followed, in keeping with County Board advice and the desires of family. Possessions will be stored securely until the disposition. Any remaining items shall be offered free to other Individuals or otherwise disposed of. Staff of The Sech-Kar Co. should receive nothing of value from the Individual's estate. (Staff could receive something like a photo or other small memento.)

Designated Staff

If the Administrator is unavailable during a crisis or emergency, the Deputy Administrator shall be his designee for acting on behalf of the Administrator. If the Deputy Administrator is unavailable, then the On-Call staff shall be the designee for acting on behalf of the Administrator during a crisis or emergency. If no one is immediately available, each staff person shall use his/her best judgment to ensure that the Individuals and property are safe.

Individuals' Illegal Behavior

If an employee is working at an Individual's home and any resident or guest in that home or on

the property is suspected of engaging in illegal activity, the employee is to do the following

1. Evaluate the safety of the situation and act to protect the safety of the Individual.
2. Ask the person engaged in the suspected illegal activity to cease the activity and/or to leave the premises.
3. Call law enforcement to report the suspected activity and request police assistance if necessary; or call the Administrator or designee who will call law enforcement.
4. If the suspected activity does not cease and the suspect refuses to leave, the employee may leave the premises with the Individual. If the Individual refuses to leave with the employee, the employee may leave until the situation has been resolved.
5. Contact the Administrator or designee as soon as possible during or after the situation.
6. The Administrator or designee shall contact the appropriate County Board of DD as soon as possible and not later than the next business day.

Ethical Practices

Services provided to Individuals should be provided with the Individuals' best interests in mind. Services should be Person-Centered and Individual-Directed. Services should not be planned for the benefit of the employee. For example, while employees may purchase a few personal items during an Individual's shopping trip, the trip should be planned for the benefit of the Individual. Individuals' shopping trips planned for the benefit of the employee violate ethical standards of practice.

In addition, employees shall not engage in financial transactions with an Individual. Employees shall not buy anything from or sell anything to an Individual. Employees are not to let an Individual spend money on them unless it is a token amount such as a soda pop or an inexpensive Christmas present (under \$20). Gifts of any significant value (i.e., over \$20) should be refused with an explanation that accepting gifts is against company policy.

Employees should never use their own money or credit cards to buy something for an Individual and then expect the Individual to pay them back.

Should an emergency situation occur, and an employee must loan an Individual money or purchase an Individual something with their own money, the employee should advise the Administrator as soon as possible of the situation. The Administrator will make arrangements for the employee to be reimbursed. Employees could face disciplinary action by having the Individual repay them directly.

Communication Channels

Employee related concerns, such as failure to meet job expectations or personality conflicts, should never be discussed with or in front of Individuals or their families. Employee related concerns should be discussed directly with those involved or with his/her immediate supervisor. Staff meetings are an appropriate time to discuss job related expectations. Personality conflicts should be discussed directly with the staff involved or, if additional help is needed, with the immediate supervisor. Training events are not the time to discuss a specific staff person's behavior.

Concerns about a particular Individual should be discussed only with that Individual, that Individual's staff, and that Individual's staff supervisor(s). Concerns about a particular Individual should never be discussed with other Individuals or staff not working with that Individual. Employees have a legal responsibility to protect the confidentiality of any Individual's information.

Foul Weather Transportation Policy

When an Individual's normal transportation provider does not provide transportation for Individuals because of snow or foul weather, but the Individual's place of employment or Adult Day Support is open for those who can provide their own transportation, the following guidelines apply:

Staff are expected to provide transportation as long as:

It is legal to drive (i.e., the Sheriff has not closed the roads).

It is important that the Individual be transported (i.e., there actually is work to be done).

The staff feel that the Individual can be transported with a reasonable degree of safety.

If the staff person cannot transport the Individual with a reasonable degree of safety, the staff person should contact his/her supervisor to see if any other arrangements can be made for transporting the Individual.

If the Individual is not going to work, the staff must encourage and assist the Individual to call work and report off for weather/transportation reasons.

Service Documentation Sheets

Service Documentation Sheets and Time Sheets must be completed accurately and in a timely manner and must corroborate one another. That is, in most cases, employees should record the same information on the Time Sheet that is recorded on the Documentation Sheet.

Once Documentation Sheets are turned into the office, they are to remain in the office.

Correcting errors or omissions must be done at the office. Correctly completing the documentation and other paperwork is essential and if not completed in a timely manner, the employee's paycheck may be withheld.

Individual's Finance Management and Accounting

Individual's accounts should not be used to purchase office or administrative items. Necessary office supplies and equipment can be provided directly by The Sech-Kar Co. or can be purchased with staff personal funds and then reimbursed by The Sech-Kar Co. by turning in receipts.

Personal funds shall be available to the Individual as stipulated in the Individual Service Plan. Each Individual shall have a separate banking account. Individual's Finance Sheets are an accounting of any cash used by the Individual when assisted by staff. These records will be kept wherever the Individual keeps his/her cash or checks and shall include the following: the Individual's name, the amount and date and source of all funds received, amount date and reason for all funds disbursed or spent, and signature of the staff person adding or removing funds from the account, a monthly reconciliation by the Administrator or his designee, and signed and dated receipts for all personal funds used by staff for an Individual.

When an Individual withdraws money from a savings account to spend or gets money from a

checking account as “cash” to spend, this is recorded both as a receipt (when the money was received from the bank) and as a disbursement (when the money was received or spent by the Individual). When cash is removed from the cash on hand account and given to an Individual to spend, this is recorded as a disbursement or expenditure. If an Individual uses personal money to purchase an item over \$50.00, a receipt must be kept on file.

Each Individual that needs assistance with finances has an Individual’s Finance Sheet that is kept in his/her file with his/her cash or checks. Whenever checks or cash are added or removed from the file, the date, purpose, amount, and staff person is recorded.

Each Individual is free to spend personal cash as he/she see fit. If necessary, staff assist each Individual to spend his/her personal cash for personal items for that person.

The Individual’s Finance Sheet is reviewed frequently by the House Manager (in Licensed sites) and, otherwise, monthly by the Administrator or his designee.

If possible, make sure the Individual initials each time staff initial the Individual’s Financial Sheet. If an Individual refuses to initial the Individual’s Financial Sheet or refuses to put a receipt in the Receipt Envelope, mark “Refused” on that date.

If the following is true, then the Individual does not have to get receipts when he/she spends his/her money:

The ISP does not require the Individual to get receipts for any amount of personal purchases and the payee does not require receipts for any amount of personal spending. {Some ISPs specify that the Individual will get receipts for any purchase over \$10.00 (as an example)}.

Anytime a staff person uses an Individual’s funds to purchase something for the Individual, then that staff must get a receipt for that purchase and that receipt must be recorded and saved.

Gift Cards

Employees shall treat all gift cards as cash. If an employee assists someone with his/her finances as stated in the ISP, then they shall record the receipt and spending of the gift card. Employee’s shall keep a log; including the serial number, date received, amount received, dates and receipts when it was spent, and date of a zero balance.

Individuals’ Files

Individuals’ files shall include two years of service plans and medical and dental records, a current photograph, legal status, records of unusual incident reports, current medication records including prescribing physician, current service plan documentation, and personal fund records.

Fire and Weather Safety in Licensed Sites

Fire evacuation plans are to be posted in a conspicuous place if required by DODD rule or appropriate Fire Department. Individuals and staff shall have annual fire safety and evacuation training. Fire drills must be conducted six times per year with at least two drills during the day, two in the evening, and two at night. At least one drill must take place when the Individuals are

usually asleep, although everyone can be warned ahead of time that a drill will be held. An operating smoke detector and fire extinguisher must be located on each floor. The house must be evacuated in less than three minutes.

Staff Meetings

For residences where multiple staff work, staff meetings should be held as needed either at the office or at the residence with the Individuals' permission. Preferably, the Individuals should not be present. The day and time should generally be agreeable to all staff and 60 minutes should be allotted for each meeting. The meetings should not be held on company holidays.

Smoking/Tobacco Use

Individual's smoking practices and safety precautions are to be developed individually for each residence in keeping with the Ohio Smoke-Free Workplace Act. Staff are never to smoke in an Individual's residence. No one shall be permitted to smoke in a garage or enclosed porch which is attached to an Individual's residence. No one is to smoke at any time in a vehicle owned by The Sech-Kar Co. Staff are never to smoke in their own vehicle if an Individual is present. Staff are not to use tobacco products that require the user to spit while inside an Individual's home, while transporting Individuals or while inside The Sech-Kar Company buildings. When smoking outside, whether outside the Individual's home, at an ADS location, or elsewhere, staff should not smoke near an Individual.

Use of Individual's Telephone by Staff

In general, Individuals' phones are not to be used by staff for personal or business-related calls. An exception to this is if the Individual does not object, then staff may use the Individual's phone for brief personal calls or The Sech-Kar Co. related calls as long as there are no charges that are assessed to the Individual's phone bill. The Sech-Kar Co. related calls made with the permission of the Individual should pertain to coordinating and providing service for the Individual.

If the Individual gives permission for staff to use the Individual's phone for calls that would be charged on the Individual's phone bill, the staff should use either a prepaid phone card or a calling card that allows the charges to be billed to another phone.

Individuals are never to be billed for or to pay for phone charges incurred by staff for calls related to the business of The Sech-Kar Co. or for staff's personal calls.

Texting/Computing/Cell Phone Use at Work

It is not okay for staff to spend work time on their cell phone talking or texting or working on their laptop. It is okay to bring a cell phone or computer or a book to work, but only to use the computer or book after 10 p.m. when it is designated "sleep time."

Staff at ADS programs should not be texting for other than a very brief personal item and ADS staff should never be posting or visiting personal Facebook or other social media sites while working.

Staff may have a brief personal phone call or text while working, but staff are paid to provide service to Individuals. Devoting work time to texting, personal phone calls, homework, or

computing is not providing service to Individuals. Use of an Individual's internet service is only permissible if:

- 1- It is okay with the Individual/guardian,
- 2- It does not create any additional expenses for the Individual,
- 3- It does not interfere with work.

Cell Phone Use While Driving

Cell phone use is not permitted while driving a company vehicle.

Cell phone use is not permitted while driving your personal vehicle if an Individual is in the vehicle with you.

Hands free cell phone use is acceptable but only for phone calls or GPS directions when set prior to driving. Not for texting or internet usage.

Staff Children and Pets

Staff are not to bring pets to Individuals' homes, nor are staff to bring pets with them at any time when they are working unless it is agreed upon by the ISP team.

Staff are not to bring children to Individuals' homes, nor are staff to bring children with them at any time when they are working.

Home Cleanliness

The Individual's home is to be kept clean and free of debris at all times. Employees shall not leave a mess for a co-worker to clean up when he/she comes to work. Employees will make sure the house or apartment is in good shape when leaving. (Don't leave dirty dishes, dirty floors, dirty bathtubs, dirty laundry, etc.)

Hazardous Material Storage in Licensed Sites

Hazardous materials are not to be stored in the home. These materials are to be stored in a shed or other building, which is not used as a dwelling.

Required Supplies in Licensed Sites

Bathrooms shall at all times have an adequate supply of toilet tissue, soap, and towels.

Fresh food sufficient for at least two days and staple foods sufficient for at least one week shall be available.

Medical Documentation

Medical Records

All medical reports, medical orders and medication change orders should be brought to The Sech-Kar Co. office so that a copy can be made for the office and also faxed to the County Board of DD.

Disposal of Discontinued Medication

Once an Individual's medication has been discontinued for 30 days, it should be returned to the office for disposal or instructions given for disposal. Medication will be counted and then mixed with either coffee grounds or cat litter and placed into the trash. All discarded medication will be recorded in the notes section of the MAR. Last count, name of medication, dose, date discarded and the signature of the persons discarding the medication shall be documented (i.e. "25 capsules of Zoloft 40mg was disposed of 12/12/13 per policy *Joe Friend, Jane Buddy*). If all medication cannot be accounted for when the count is done, do not dispose of medication and follow MUI/UI reporting procedure and notify The Sech-Kar R.N. In the event of a death of an Individual, all medication will be retained in the home until further instruction is provided by the County Board.

MEDICATION ADMINISTRATION POLICIES

For

The Sech-Kar Company

(Adopted: 3-31-06)

(Last Revised: 09-24-2020)

The Sech-Kar Company (TSKC) adheres to rule 5123-2-6 of the Ohio Administrative Code for Medication Administration.

A. Purpose:

To establish safe, appropriate requirements and practices for the administration of medication, the performance of health-related activities, and the performance of tube feedings consistent with administrative rules as promulgated by DODD. This policy is intended as a ready reference to major requirements of the above-cited rules applicable to The Sech-Kar Co. It is not intended to cite every portion of each rule.

B. Authorization of Staff to Administer Prescribed Medication, Perform Health-Related Activities or Perform Tube Feedings

All of the Following apply:

- i. Without nursing delegation, DD personnel may perform health related activities after completion of the required 14-hour Certification 1 medication administration training course.
- ii. Without nursing delegation, DD personnel may administer oral and topical prescribed medications after completion of the required Certification 1 medication administration training course.
- iii. With nursing delegation, DD personnel may administer prescribed medications through stable, labeled gastrostomy and jejunostomy tubes after completion of both the required Certification 1 and Certification 2 courses.
- iv. With nursing delegation, qualified staff may administer routine doses of insulin through subcutaneous injections and insulin pumps after completion of both the required Certification 1 and Certification 3 courses.

- v. In addition to the above, DD personnel must receive Individual Specific Training by the Individual's parents, Home Manager, or other designated staff prior to the administration of medication administration or health related activities. Nursing delegation must be completed by the delegating RN prior to the DD personnel's provision of tube feedings or the administration of medications through gastrostomy or jejunostomy tubes, or the administration of insulin through subcutaneous injections or by insulin pump.
- C. Qualifications, Training, and Certification of Staff in the Administration of Prescribed Medications, Performance of Health-Related Activities, and Performance of Tube Feedings
- 1. Qualifications for employment as a Direct Support Professional (DSP) (specific to this policy; other requirements may apply):
 - i. At least eighteen years of age.
 - ii. High School diploma or GED.
 - iii. Successful completion of background check, including State Nurse's Aide Registry, DODD Abuser Registry, and criminal record.
 - 2. Training Requirements
 - i. Successful Completion of the 14-hour Certification 1 training course required by DODD.
 - 3. Certification
 - i. Prior to administering medications or performing health related activities, staff must complete a 14-hour Certification 1 course approved through DODD. Prior to providing medication administration through a stable, labeled gastrostomy or jejunostomy tube, staff must complete the additional 4-hour Certification 2 course. Prior to administering insulin through subcutaneous injections or through an insulin pump, staff must complete the additional 4-hour Certification 3 course. Staff must complete continuing education prior to certification expiration dates. Certification 1 requires 2 hours of continuing education yearly. Certifications 2 and 3 require 1 hour of continuing education yearly. Documentation of completed continuing education and annual skills checks for each certification will be submitted to a certified nurse trainer annually for recertification. There is a 60-day grace period for recertification. If staff does not complete recertification requirements by the end of the grace period, their certification will lapse, and they will be required to complete the necessary certification course work in its entirety. If renewal is not completed prior to the certification expiration date, staff may not administer any medications or perform any health-related activities during the renewal grace period.

- ii. For newly hired employees who state that they have current Certification 1, 2, or 3, The Sech-Kar R.N., Trainer, or other designee shall verify and document on the DODD MAIS site that the newly hired employee does have necessary certification before that newly hired employee administers any medications or performs health-related activities for any Individual.

D. Additional Considerations

1. Administration of medication is to be consistent with training provided regarding each individual's Medication Administration Record, the individual's ISP, and as individual service or training needs dictate. Scheduled medications may be given one hour before and up to one hour after scheduled time.
2. Reporting and documenting all errors that occur when administering medication or performing health-related activities shall occur via unusual incident reporting policies within 24 hours. In the event of a medication error, immediate follow-up action must be initiated based on direction from or the judgment of a medical professional. This may include directions provided by the pharmacist, counsel from the Individual's family physician or a nurse, or an actual examination by a medical professional. Corrective action related to the DD personnel who committed an error may include additional training, supervisory review, disciplinary action and/or suspension of the medication administration certification based upon the specifics of the situation.
3. Medications are to be stored in their original pharmacy containers. The storage area should be secure, discrete, clean, and orderly. Medications will also be stored in accordance with the instructions on the package (i.e. medications that are to be stored in the refrigerator or protected from the light). If there is a concern for the health and safety of an Individual, or scheduled narcotics are ordered, medications may be stored in a locked container, if specified in the Individual's ISP. All controlled medications are to be counted daily; even if not administered that day. If counts are off, contact TSKC MUI coordinator and TSKC Nurse immediately. TSKC Nurse is responsible for monthly controlled substance counts in Individuals' homes to ensure the count is accurate with the controlled substance log.
4. The Medication Administration Record (MAR) will indicate the month, Individual's name, his/her date of birth, allergies, the medication(s) to be given, medication dose, medication frequency, and medication indications. The MAR will record medications administered, missed, held, refused, or discontinued. These and other alterations in the administration of medications will be noted in the MAR notes section. It is the responsibility of the Home Manager or other designated staff to fill out the MAR on a monthly basis. If a new medication is ordered, staff may transcribe the order with the original pharmacy container and document accuracy check of this medication to the documentation

section of the MAR. A second accuracy check of the transcribed order must be completed and documented by next staff to arrive at residence. When administering PRN medications documentation shall include the name of the medication, date, time, the reason the medication was administered, any notable side-effect and the effectiveness of the medication in the notes section of the MAR. When administering PRN medications, a note detailing the reason given (e.g., behavior or level of pain) and the results after 30-60 minutes needs to be included in the notes section. If an Individual is away from his/her home for a period of time requiring medication to be sent with that Individual, medication will be provided to the person taking responsibility for the Individual during his/her absence. TSKC staff will send the appropriate amount of medication needed for the Individual's absence in an original pharmacy container that includes the Individual's full name, medication, dose, time, and route. TSKC staff will then enter and circle his/her initials on the MAR. A notation will be made on the back of the MAR stating the date, time, the name of the medication, the reason the medication was not administered, and an indication of who took responsibility for the administration of the medication.

5. Medication Administration Records will be generated monthly by TSKC Nurse and compared to the previous month's MAR to ensure all orders have been carried over by the Home Manager or other designated staff. The Home Manager will complete documentation in the notes section indicating that the second MAR accuracy check has been performed.
 - i. Gastrostomy, jejunostomy and insulin orders: Contact the delegating nurse immediately. Only the delegating nurse may transcribe orders onto the MAR. Delegation must take place before medication or tube-feeding administration occurs.
 - ii. If TSKC staff transcribe a new order or med change onto the MAR, the next staff to come to work must check the new order against the transcribed MAR. TSKC staff must initial, date and record that they have done so on the back of the MAR. A second staff person must check the new order within 24 hours of receipt from the physician.
 - iii. TSKC Nurse will review the MAR on a monthly basis.
 - iv. Staff will receive Individual Specific Training on an Individual's medications from the Home Manger, TSKC Nurse or other designated staff prior to working with the individual.
6. For all as needed medications, the physician must include strict parameters for administration (e.g., the Individual shall receive this medication if he is exhibiting these behaviors pacing, aggression towards self or others, etc.).
7. Unless otherwise indicated by an authorized prescriptive authority, all medications shall be reviewed by the prescribing health professional on a quarterly basis.

8. In the event of an Individual's death, an accounting of medication shall be completed as soon as possible, but no later than twenty-four hours after the death and recorded by two staff.

Health and Safety Considerations

Standard Universal Precautions including hand washing before and after contact with an Individual; after contact with any organic material; after toileting or assisting with toileting; after covering mouth and nose when sneezing or coughing; and before and after removing gloves.