



# **Health and Safety Policies & Emergency Action Plans**

**Appendix III**

**Reviewed and Approved Annually**

<b>EMERGENCY ACTION PLAN .....</b>	<b>I</b>
EMERGENCY ACTION PLAN SAFETY PERSONNEL .....	1
EMERGENCY ACTION PLAN PREPAREDNESS .....	3
EMERGENCY ACTION PLAN .....	4
EMERGENCY ACTION PLAN CONDITIONS AND BASIC STAFF RESPONSES .....	6
EMERGENCY ACTION PLAN TELEPHONE NUMBERS .....	7
EMERGENCY ACTION PLAN FLOW CHART .....	8
CRISIS PLAN.....	9
EMERGENCY ACTION PLAN MANAGEMENT PLAN: BOMB THREATS .....	10
<i>Bomb Threat Information Sheet</i> .....	11
EMERGENCY ACTION PLAN: COMMUNICATION FAILURES .....	12
EMERGENCY ACTION PLAN: EXPLOSION .....	14
EMERGENCY ACTION PLAN: FIRE EMERGENCIES.....	15
EMERGENCY ACTION PLAN: RESIDENTIAL FIRE .....	16
EMERGENCY ACTION PLAN: SEVERE WEATHER PLAN.....	18
EMERGENCY ACTION PLAN: RESIDENTIAL SEVERE WEATHER PLAN.....	19
EMERGENCY ACTION PLAN: EARTHQUAKE PLAN .....	20
EMERGENCY ACTION PLAN: FLOOD.....	21
EMERGENCY ACTION PLAN: RESIDENTIAL FLOOD.....	22
EMERGENCY ACTION PLAN: WINTER STORM.....	23
EMERGENCY ACTION PLAN: INTERNAL DISASTERS .....	26
EMERGENCY ACTION PLAN: BIOHAZARDOUS INCIDENTS .....	27
EMERGENCY ACTION PLAN: LOSS OF FACILITY .....	28
EMERGENCY ACTION PLAN: MISSING RESIDENT/PERSONS SERVED .....	29
EMERGENCY ACTION PLAN: NATURAL GAS LEAK .....	30
EMERGENCY ACTION PLAN: SECURING INCIDENT SCENES .....	31
EMERGENCY ACTION PLAN: WORKPLACE VIOLENCE.....	33
EMERGENCY ACTION PLAN: EVACUATION PROCEDURES .....	34
EMERGENCY ACTION PLAN: HANDLING OF EVACUEES.....	36
EMERGENCY ACTION PLAN: TEMPORARY SHELTER .....	37
EMERGENCY ACTION PLAN: DEBRIEFINGS .....	39
EMERGENCY ACTION PLAN: DEBRIEFING- ROOT CAUSE ANALYSIS .....	40
UNUSUAL CRITICAL INCIDENTS .....	41
OIG / ALLEGATIONS OF ABUSE/NEGLECT AND DEATHS .....	45
INDEPENDENCE CENTER INVESTIGATIVE PROTOCOL .....	54
BUILDING AND SAFETY INSPECTIONS .....	55
<b>MEDICAL .....</b>	<b>56</b>
FIRST AID PLAN.....	57
FIRST AID, CPR AND AED TRAINING.....	59
ADVANCE DIRECTIVES AND DO NOT RECESITATE ORDERS.....	60
COMMUNICABLE DISEASES.....	62
NOROVIRUSES/FOOD SANITATION .....	63
NARCAN (NALOXONE) POLICY .....	64

<b>ENVIRONMENTAL .....</b>	<b>66</b>
HOUSEKEEPING .....	67
BED BUG ABATEMENT .....	70
INFECTION CONTROL .....	71
UNIVERSAL/STANDARD PRECAUTIONS .....	72
SAFETY DATA SHEETS .....	76
CONTROL OF CHEMICAL MATERIALS .....	77
STORAGE AND DISPOSAL OF HAZARDOUS MATERIALS .....	78
NONVIOLENT PRACTICES .....	80
SAFETY AWAY FROM CENTER – COMMUNITY ACTIVITIES AND ELOPEMENT/WANDERING .....	81
SAFETY AWAY FROM CENTER – HOME, HOUSING, SITE VISITS .....	82
TOBACCO/SMOKING.....	83
NO ILLICIT DRUGS POLICY .....	84
NO WEAPONS POLICY .....	85
OFFICE ERGONOMICS .....	86
PARKING SAFETY .....	90
HEALTH AND SAFETY INSPECTIONS .....	91
PROCEDURE FOR SAFETY CHECKS AND CORRECTIVE ACTION PLANS.....	92
<b>ADDENDUM I: COVID POLICIES .....</b>	<b>93</b>
COVID-19 PREPAREDNESS PLAN.....	94
<i>Screening and policies for employees exhibiting signs and symptoms of COVID-19</i> .....	94
<i>Handwashing</i> .....	95
<i>Social distancing</i> .....	95
<i>Cleaning, disinfection, and ventilation</i> .....	96
<i>Communications and training</i> .....	96
SOCIAL DISTANCING POLICY .....	97
INDEPENDENCE CENTER COVID-19 NOTIFICATIONS .....	99

# Emergency Action Plan



# EMERGENCY ACTION PLAN SAFETY PERSONNEL

---

**Policy:** The Independence Center is committed to health and safety practices.

**Scope:** All Staff

Page 1 of 2

**Revised:** December 2022

---

Emergency Action Plan Action Plan Safety Personnel consist of:

## ***Emergency Action Plan Management Group***

The Emergency Action Plan management group is responsible for controlling all emergencies. This group will consist of: Incident Commanders, an Emergency Action Plan Director, Health and Safety Committee, Evacuation Wardens and Shelter Managers.

## ***Incident Commander Job Description***

The Incident Commander is responsible for:

- the management of the incident
- tactical planning and execution
- determining when outside assistance is needed
- relaying requests for internal resources or outside assistance through the Emergency Action Plan operations center
- they must have the ability to assume command
- assess the situation
- implement the Emergency Action Plan management plan
- determine response strategies
- activate resources
- order an evacuation
- oversee all incident response activities
- declare the incident is “over”

## ***Emergency Director Job Description***

Is the Independence Center Executive Director. The Executive Director/Emergency Action Plan Director is in control of all aspects of the Emergency Action Plan. The ED has the authority to:

- Determine the short- and long-term effects of the Emergency Action Plan
- Order the evacuation or shut down of the facility
- Interface with outside organizations and the media
- Issue press releases

### ***Health and Safety Committee Job Description***

Independence Center has established a health and safety committee and appointed a Health and Safety Officer for the purpose of implementing health and safety practices. The Executive Director will ensure that the work of the Health and Safety Committee is efficacious.

The purpose of the Independence Center Health and Safety Committee is to prevent and/or minimize all emergencies whenever possible. All Independence Center members, staff and board members are expected to participate in the health and safety endeavors. This includes the responsibility for:

- Recognizing and reporting emergencies
- Creating, revising health and safety protocols and policies
- An annual evaluation of the effectiveness of the Emergency Action Plan Preparedness Plan
- Quarterly review of incident reports
- Review relevant sources of safety information
- Record and report accident trends and post in employee area
- Taking security and safety measures
- Evacuating safely
- Providing and attending trainings

### ***Evacuation Wardens Job Description***

The Evacuation Wardens are responsible for the following:

- Assisting persons out of the Independence Center facilities safely
- Accounting for the location of personnel
- Maintaining sign in sheet in order to account for persons served
- Execution of evacuation procedures-upon receipt of Emergency Action Plan evacuation code from the Incident Commander

### ***Shelter Managers Job Description***

The Shelter Managers are responsible for the following:

- Upon receipt of the evacuation code from the Incident Commanders, Shelter Managers shall call potential shelter sites to check and see if occupancy allows for shelter and inform Incident Commanders and Evacuation Wardens of the designated site
- To maintain safety and security at the shelter site
- To set up transportation of persons served back to their residences
- To arrange transportation of personnel to out of town safety site
- To initiate phone tree

# EMERGENCY ACTION PLAN PREPAREDNESS

---

**Policy:** The Independence Center will establish and maintain an Emergency Action Plan Preparedness Plan designed to manage the consequences of natural disasters or other emergencies that disrupt the Independence Center's ability to provide care.

**Scope:** All Staff

Page 1 of 1

**Revised:** September 2021

---

## PURPOSE

To conduct business normally; it is important for the Independence Center to have a strategy on preparation for emergencies. This plan must provide Independence Center organizational structure so that the Independence Center can effectively prepare for both external and internal disasters that can negatively affect its environment of care.

## STRUCTURE

The Independence Center plays an important role as a provider of care to the members of its community. The Independence Center is ready to assist as needed in case of community emergencies, and as appropriate integrates its Emergency Action Plan Preparedness Plan with community disaster plans, as appropriate, to support the community's response to a disaster. The Independence Center will train its personnel in this plan.

The scope of this Independence Center Emergency Action Plan, both internal and external, will determine the role of the Independence Center or its personnel in responding to an emergency. The Independence Center will participate in Emergency Action Plan preparedness drills each year as required by CARF standards. The Independence Center Health and Safety Officer, in collaboration with the Health and Safety Committee will tailor the Independence Center-specific Emergency Action Plan Preparedness Plan. This plan contains processes for preparedness, response, mitigation, and recovery in the event of an emergency.

The first step in preparing an effective Emergency Action Plan preparedness plan is to prepare a Hazard Vulnerability Analysis (HVA). This analysis assists the organization in determining where it is most vulnerable to emergencies. Completion of the HVA is the organization's first step in the development of mitigation strategy.

## DEFINITIONS

**External Disaster:** A civil catastrophe, either manmade or caused by an act of nature. An external disaster may overwhelm normal facilities. This condition can occur as a result of fires and explosions, storms, civil disorders, multiple injury accidents, military action, among other causes.

**Internal Disaster:** An event such as a fire or explosion resulting in internal casualties or circumstances. If the situation requires the evacuation of members, such evacuation will be coordinated with emergency service personnel from the fire and police agencies.

**Mitigation Activities:** activities a health care organization undertakes in attempting to lessen the severity and impact a potential disaster or emergency may have on its operation while preparedness activities are those an organization undertakes to build capacity and identify resources that may be utilized should a disaster or emergency occur.

**It is the responsibility of the Independence Center Emergency Action Plan Director or his or her designee to activate the Emergency Action Plan Preparedness Plan.**

# EMERGENCY ACTION PLAN

---

**Policy:** The Independence Center will establish and maintain an Emergency Action Plan designed to manage the consequences of natural disasters or other emergencies that disrupt the Independence Center's ability to provide care.

**Scope:** All Staff

Page 1 of 2

**Revised:** November 2019

---

## Executive Summary

Emergencies strike with little or no warning. When they do occur, it is too late for any further planning, organizing, or training, all of which are essential to effective Emergency Action Plan management. Failure to be adequately prepared for such events may result in grave consequences to Independence Center, its employees and membership.

Independence Center regards Emergency Action Plan preparedness/response as an important fundamental company responsibility necessary for the preservation of the Independence Center infrastructure and the protection of lives and property.

It is our policy to achieve the necessary preparedness and disaster response capability guided by a well thought out plan, which enables trained employees to execute their Emergency Action Plan roles.

Independence Center has established a Health and Safety Committee and appointed a Health and Safety Officer for the purpose of implementing health and safety practices. The Executive Director will ensure that the work of the Health and Safety Committee is efficacious.

The purpose of the Independence Center Health and Safety Committee is to prevent and/or minimize all emergencies whenever possible. All Independence Center members, staff and board members are expected to participate in the health and safety endeavors.

Potential Emergencies: workplace threats and violence (bomb threats, acts of violence, active shooters), natural disasters (tornadoes, floods, weather related emergencies, earthquakes), fires, biohazards, hazardous waste; accidents (falls, vehicle accidents, sentinel events, medical emergencies) gas leaks and power failures.

These emergencies and response operations will be managed at the main Independence Center campus. If the main Independence Center facility is deemed inoperable by the emergency at hand, the Independence Center English Manor offices will be the site where emergencies will be managed. This office will also serve as a back-up site for the response operations. These will be the Emergency Action Plan management and response sites for all Independence Center programs and properties.

Office nine on the upper level of the 2025 Washington Street location will be the designated Emergency Action Plan operations center. The English Manor offices will be the back-up Emergency Action Plan operations center. These offices will include the following resources: communications equipment, a copy of the Emergency Action Plan management plan, blueprints, maps, status boards, a list of Emergency Action Plan personnel and descriptions of their duties, technical information and data for advising responders, building security system information, information and data management capabilities, telephone directories, back-up power, communications and lighting, Emergency Action Plan supplies.

All staff will be provided opportunities to receive CPR/AED and first aid training. The Center will have at least 1 staff member on duty who is first aid and CPR/AED certified.



The Independence Center has appointed a Health and Safety Committee comprised of: The Health and Safety Officer and committee members who represent the different program areas. This committee will oversee the Center's Health and Safety operations and ensure that the Emergency Action Plan is feasible and is implemented appropriately.

All staff will have access to the Health and Safety Manual And Emergency Action Plan with information that guides them on how to handle various health and safety issues as well as necessary telephone numbers.

There will be well-labeled first aid kits on all Center property.

The Center will maintain as a course of business an effective fire suppression system. This system will be inspected on an annual basis.

The Center will have regular inspections from outside sources to insure safety. These sources will include fire inspectors, health inspectors, etc., in accordance with our policy.

The Center will conduct semi-annual self-inspection on all of its sites. The purpose of these inspections will be to analyze any possible safety defects and hazardous and functional deficiencies. A report will be generated from this inspection which will include areas inspected, recommendations for areas needing improvement and actions to be taken to respond to the recommendations. The following plan is to assist members and staff in cases of Emergencies at the Independence Center.

The following Emergency Action Plan Management policies will assist persons of Independence Center with regard to procedures to follow in various emergencies. All policies that do not have designated sites listed are applicable to all sites.

# EMERGENCY ACTION PLAN CONDITIONS AND BASIC STAFF RESPONSES

Problem and Announcement	Description	Initial response	Secondary response	Follow up
Bomb threat <b><u>CODE WHITE</u></b>	Notification of a bomb	Page Code White Complete bomb threat form and obtain as much info as possible. Notify all in building to evacuate. Report all information to police.	Fill out <i>incident report</i> and attach to bomb threat form.	External Emergency Action Plan Personnel will conduct search.
Fire <b><u>CODE RED</u></b>	Fire, smoke or smell of smoke	Page Code Red  Rescue Alarm Contain Extinguish/Evacuate	Verify type of fire and use the appropriate extinguisher to put out small fire. After fire is successfully extinguished complete incident report.	(All staff) Evacuate if necessary ambulatory then non-ambulatory. Complete incident report.
Fire <b><u>CODE RED EVACUATION</u></b>	Remaining in building/area may be hazardous to life, health or safety.	Page Code Red Evacuate Notify all in building/area to evacuate ambulatory then non-ambulatory.	Report to designated assembly area and account for all who were in previous building/area.	Evacuation Wardens will report completed evacuation to Incident Commanders. Identify any personnel or members unaccounted for.
Internal Disaster <b><u>CODE ORANGE</u></b>	Emergency Action Plan within the Center.	Page Code Orange Evacuate person in immediate danger	Await further instructions from Incident Commanders.	Secure area.  Complete incident report.
Severe Weather <b><u>CODE YELLOW</u></b>	Severe weather Emergency Action Plan	Page Code Yellow Move members from windows and outside locations.	Await further instructions from Incident Commanders.	Secure area.  Complete incident report.
An Act of Violence <b><u>CODE GRAY</u></b>	Crisis or violent act being committed.	Page Code Gray.	Clear area except for necessary respondents.	Secure evidence and any uninjured witness. Complete incident report.
An Act of Evacuation  <b><u>CODE "EVACUATION"</u></b>	Emergency Action Plan requiring the evacuation of housing or the main building.	Page Code Evacuation  Evacuate using an exit unobstructed by the Emergency Action Plan	Account for all attending members and staff.	Secure area.  Complete incident report.

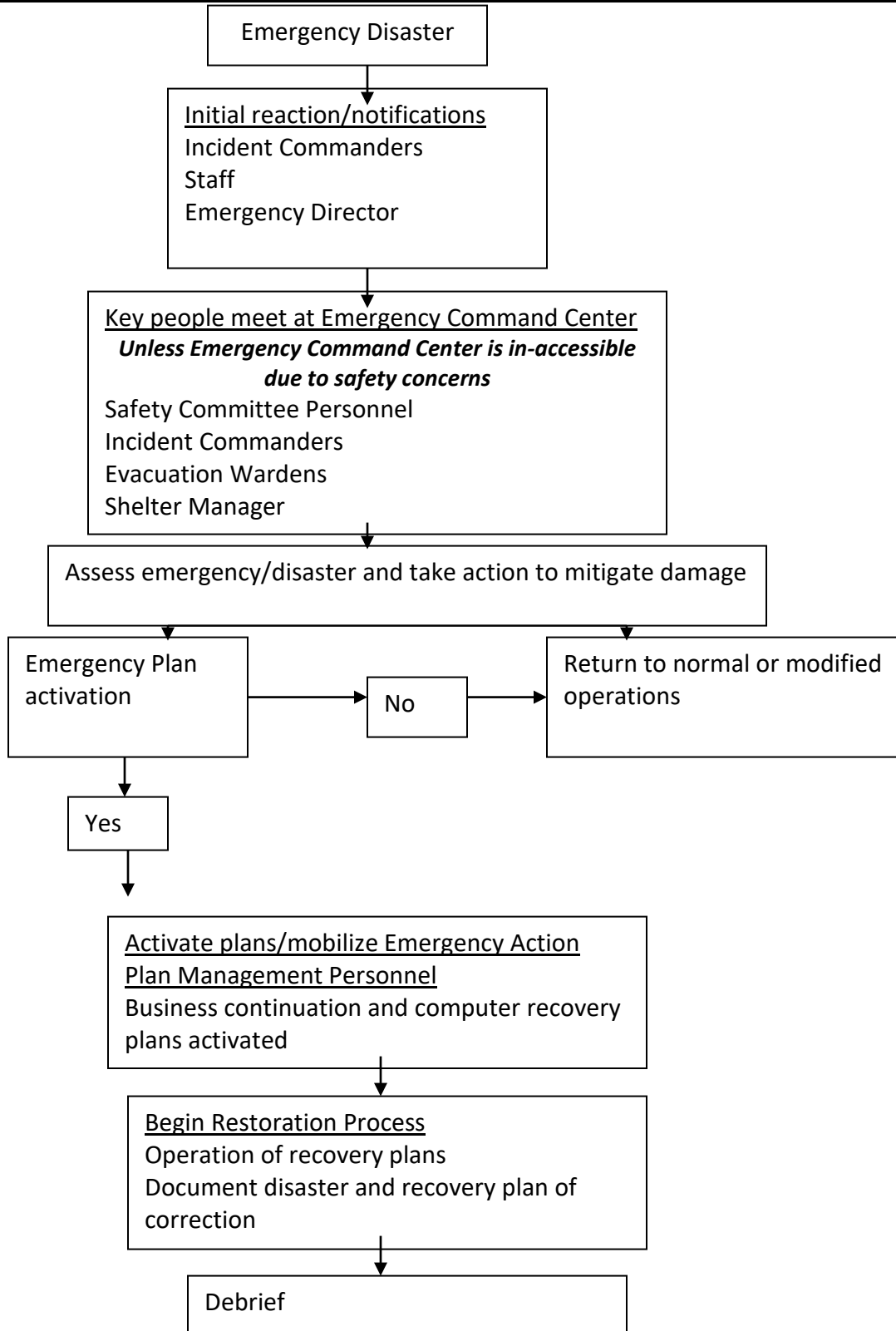
# EMERGENCY ACTION PLAN TELEPHONE NUMBERS

---

Police, Fire, Rescue: 911	Police Non-Emergency Action Plan 847-360- 9000 or 847-249-5410	Lake County Sheriff's Office  Department of Emergency Action Plan Management Agency 1303 N. Milwaukee Ave, Libertyville, IL 60048 Phone : 847- 377-7100
Illinois State Police 847-931-2405 (Elgin)	Lake County Sheriff (Non-Emergency Action Plan) : 847-549-5200	During an Emergency Action Plan or disaster tune your radio to WXLC 102.3 FM or WKRS 1220 AM, for current information relation to the Lake County area.
North Shore Gas LEAKS 866-556-6005	Lake County Crisis Care Program (CCP) 847-377-8088	
Electric Company Com-Ed 800-334-7661	City of Waukegan 847-599-2500  Mayor's Office 847-599-2510	
Illinois Poison Center 800-222-1222	Federal Info  800-333-4636	
National Health Info Center 800-336-4797	Independence Center 847-360-1020	
Center for Disease Control HIV 800-342-AIDS (2437) or 800-227-8922 Gen.		

# EMERGENCY ACTION PLAN FLOW CHART

---



# CRISIS PLAN

---

In the event of an Emergency during non-operation hours members of the Independence Center should follow these steps:

**Call 911 or The Living Room Wellness Center 1-88-707-1614**

**The following emergencies should be directed to 911:**

- Is or becomes unconscious
- Has trouble breathing or is breathing in a strange way
- Has chest discomfort pain or pressure that persists for more than 3-5 minutes, or that goes away and comes back
- Is bleeding severely
- Has pressure or pain in the abdomen that does not go away
- Is vomiting or passing blood
- Has a seizure that lasts more than five minutes or multiple seizures
- Has a seizure and is pregnant
- Has a seizure and is diabetic
- Has a severe headache or slurred speech
- Appears to have been poisoned
- Has injuries to the head, neck or back
- Has possible broken bones
- Physical assaults of any nature
- Theft
- Intruders
- Fires

Other emergencies should be directed to **The Living Room Wellness Center 1-888-707-1614**. The Living Room will attempt to resolve any emergencies that occur after hours at the Independence Center.

If the Emergency requires Independence Center staff intervention the Living Room staff will precede with the following protocol for contacting Center personnel:

- Attempt to contact staff person on call by telephone
- If unsuccessful Living Room will leave call back number and message

Staff persons on call should respond immediately to any crisis calls by doing the following:

- Responding to all calls from the Living Room immediately
- Assessing appropriate interventions necessary for the situation at hand. Which may include making follow-up phone calls to member(s) that involved in situation. Calling any necessary Emergency services (e.g. police, EMT, fire department, contractors such as plumbers, heating and cooling). After assessing situations on call staff should be prepared to make necessary clinical assessment following the crisis intervention policies. If necessary on call staff should be prepared to respond to situation in person.
- All situations should be documented using an incident report. Situations requiring staff persons to respond in person should document duration of time spent responding to situation from initial call.

# **EMERGENCY ACTION PLAN MANAGEMENT PLAN: BOMB THREATS**

---

**Policy:** If a bomb threat is made by telephone or in person the staff at the facility shall implement the Bomb Threat Emergency Action Plan procedures detailed in this Emergency Action Plan. In the event of workplace violence staff shall implement the workplace violence Emergency Action Plan procedures detailed in this policy.

**Scope:** All Staff

Page 1 of 3

**Site:** All Sites

**Revised:** December 2022

---

The person receiving a bomb threat, either in person or over the telephone should remain calm, summon help and try to obtain the following information:

- Listen to the message without interrupting the caller
- Write down the message noting the time of call, unusual background noises, and estimated age of caller, try to keep the caller talking

**\*Complete Bomb Threat Information Sheet & Incident Report\***

Summon help using established alert: **Code WHITE**

Do not use phones, pagers or intercoms inside building or vans

Do not evacuate to or use a facility vehicle

The person in charge shall appoint one person to notify staff and evacuate the facility.

All persons **IMMEDIATELY** evacuated to the designated shelter site as indicated by Shelter Manager.

As soon as you are a safe distance from the building call **911**.

The Incident Commander shall call the Emergency Action Plan Director and inform of the situation at hand.

***Preparedness:***

1. A test of this plan shall be completed annually
2. A copy of this plan shall be kept at each desk

**BOMB THREAT INFORMATION SHEET**

When is the bomb going to explode? \_\_\_\_\_

Where is the bomb? \_\_\_\_\_

What does it look like? \_\_\_\_\_

What kind of bomb is it? \_\_\_\_\_

What will cause it to explode? \_\_\_\_\_

Did you place the bomb? \_\_\_\_\_

Why was it placed? \_\_\_\_\_

What is your name? \_\_\_\_\_

What is your address? \_\_\_\_\_

Gender of caller: M / F Age: \_\_\_\_\_ Ethnicity: \_\_\_\_\_ Time of call: \_\_\_\_\_ AM/PM

Length of call: \_\_\_\_\_

**Caller's voice (circle appropriate answer)**

- |           |          |          |        |          |                 |
|-----------|----------|----------|--------|----------|-----------------|
| Calm      | Soft     | Distinct | Raspy  | Familiar | Angry           |
| Loud      | Slurred  | Deep     | Nasal  | Ragged   | Clearing Throat |
| Excited   | Laughing | Slow     | Crying | Stutter  | Deep Breathing  |
| Disguised | Rapid    | Normal   | Lisp   | Accent   | Cracking Voice  |

**Background Sounds (circle appropriate answers)**

- |               |           |                 |               |
|---------------|-----------|-----------------|---------------|
| Street noise  | Voices    | Office machines | Long Distance |
| Animal noises | Static    | Local           | Machinery     |
| House noises  | PA system | Clear           | Booth         |
| Music         | Motor     | Other           |               |

**Language:**

- |              |            |            |
|--------------|------------|------------|
| Well-spoken  | Incoherent | Foul       |
| Message read | Taped      | Irrational |

Remarks:

\_\_\_\_\_  
\_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

# EMERGENCY ACTION PLAN: COMMUNICATION FAILURES

---

**Policy:** Communications are essential to any business operations. Independence Center shall enact the following procedure should communication failures occur.

**Scope:** All Staff

Page 1 of 2

**Site:** All Sites

**Revised:** December 2022

---

## ***Procedures***

All communication, both within and outside the Independence Center, will be coordinated through the receptionist desk as directed by the Independence Center Emergency Action Plan Director and Health and Safety Officer. The Incident Commanders shall be informed.

If phone lines are inoperable, Independence Center staff will use a cellular telephone to call the local phone company to inform the phone company of trouble being experienced. If phone line is inoperable for longer than one hour, the Independence Center will instruct the local phone company to forward all calls to the Independence Center cellular telephones.

If the Independence Center's facsimile machine is inoperable, any outgoing facsimiles will be sent via the facsimile machine at the administrative office at the English Manor property. If any person outside the agency calls wishing to send the Independence Center facsimiles, Independence Center staff shall inform such callers of the facsimile machine's malfunction and ask such callers to send information later, or by other means such as US mail or electronic mail.

If the Independence Center's computer communications systems fail, all staff will be instructed to use paper interoffice mailboxes or interoffice phone lines, if possible.

If all communication systems are down, The Emergency Action Plan Operations Center (EOC) will be supplied with at least two bullhorns to announce to persons in and around the facility any Emergency Action Plan alerts or communications. Additionally, 2 way radios will be located at the Housing Coordinator's office (English Manor). Cellular telephones will be utilized in such emergencies to contact Emergency services such as the police, fire department, etc.

Should landline telephone service be rendered inoperable by the Emergency at hand or other factors, the Incident Commander will have a cellular telephone available to receive Emergency calls.

The Incident Commander shall notify the Emergency Action Plan Director of any emergencies. The Emergency Action Plan Director and all Incident Commanders shall have cellular telephones available during hours of center operations to receive notification of emergencies. In the event an emergency occurs after the close of center operations, staff or the person served shall contact the Living Room Program who will then contact the on-call Incident Commander.

## ***Family Communications***

A copy of staff Emergency contacts will be kept in the EOC at all times. In the event of an emergency, the Incident Commander will notify the emergency contact person of the personnel impacted by the emergency as soon as the emergency is resolved.

In the event of an emergency and the City of Waukegan is forced to evacuate, the Incident Commander will contact New Foundation Center, Inc. in Northfield at 847-501-4718, to inform them of personnel status and other pertinent information. Emergency contact persons may contact this agency for information about personnel. In the event the City of Waukegan is inaccessible after an emergency evacuation, family members can be directed to meet at New Foundation Center, Inc. located at 444 Frontage Road, Northfield, IL.



***Notification***

In the event of an emergency, staff shall follow the IC Emergency Action Plan code system procedures. All personnel will be trained to follow the guidelines of the Independence Center Emergency Action Plan code system. Emergency Action Plan telephone numbers will be placed at each telephone and at other prominent locations. This list will include the number to the Living Room Program to ensure contact with the Incident Commander. Independence Center staff will monitor National Weather Service severe weather warnings using the Independence Center's weather band radio, and notify the Incident Commander of any severe weather warnings issued. The radio will be tuned to WXLG at all times. This radio station broadcasts local severe weather warnings and evacuation alerts for the City of Waukegan.

***Warnings***

In the event of an emergency, the Incident Commander will alert staff and persons served using the Independence Center's intercom system. If that system malfunctions, the Incident Commander will use the Independence Center's bullhorn to alert staff and persons served of the emergency situation. The Independence Center's code system and other warning procedures shall be posted in all work areas.

***Debriefings***

Debriefings shall be performed after all Emergency Action Plan exercises and emergency incidents. The purpose of which will be to: gather information, improve Emergency Action Plan responses, to minimize shock, disorientation, confusion, fear or any stress reactions related to dealing with an emergency situations or natural disasters.

# EMERGENCY ACTION PLAN: EXPLOSION

---

**Policy:** In the event of an explosion, the site supervisor or incident commander shall sound the alarm.

**Scope:** All Staff

Page 1 of 1

**Site:** All Sites

**Revised:** March 2003

---

## ALERT: CODE ORANGE

### ***Procedure***

Staff shall assist consumers in immediate evacuation to the designated shelter site as indicated by the Shelter Manager.

At evacuation site:

- **CALL 911**
- Give location
- Type of explosion (if known)
- Estimate of injuries (type/number)
- Estimate of # persons missing (if any)
- Conduct head count
- Check for injuries
- Administer first aid
- If possible (without risk) obtain portable phone, first aid kit
- When help arrives contact Incident Commander or call CCP at (847)377-8088
- Follow directions of Emergency Action Plan personnel/law enforcement officers

### ***Preparedness***

A test of this plan shall be conducted annually.

# EMERGENCY ACTION PLAN: FIRE EMERGENCIES

---

**Policy:** The following policy shall be followed when someone discovers a fire in one of Independence Center buildings regardless of how big the fire is. The staff at the site shall implement the fire procedures detailed in this Emergency Action Plan.

**Scope:** All Staff

Page 1 of 1

**Site:** Main Site and 1730 Washington St. Office Area

**Revised:** December 2022

---

## **ALERT: CODE RED Evacuation**

### ***Procedures***

1. **R = RESCUE** anyone in immediate danger from the fire, if it does not endanger your life.
2. **A = ALARM:** sound the alarm by paging “code red”. Also the fire pull alarm should be pulled, these are located adjacent to exits. Announce the location of the fire if known. Call 911
3. **C = CONFINE** the fire by closing all doors and windows where the fire is located, and all doors on the way out.  
**E = EXTINGUISH** If the fire is small and you have been trained to use the fire extinguisher, you may attempt to put the fire out. If you have not been trained to use the fire extinguisher or the fire is too large to extinguish,  
**EVACUATE** the building and follow the evacuation plan.
4. Evacuation Wardens shall ensure all persons in the building are assisted in evacuation.
5. The receptionist or person on duty at the front desk shall be responsible for bringing the first aid kit and the sign in log to the designated area.
6. All persons shall remain in the designated area or at the evacuation site until the “all clear” designation has been given by the Incident Commander.

### ***Preparedness:***

A test of this plan shall be conducted annually. A drill report shall be completed after the test and made a part of the self-inspection report.

A fire extinguisher and fire safety training shall be conducted by a competent authority for staff and interested stakeholders.

# EMERGENCY ACTION PLAN: RESIDENTIAL FIRE

---

**Policy:** If a threatening fire is reported or is evident in the area, or if the smoke alarms sound, the person discovering the fire or hearing the smoke alarm will sound the fire alert. The staff at the site shall implement the fire procedures detailed in this Emergency Action Plan.

**Scope:** All Staff

Page 1 of 2

**Site:** Independence Center Residential Properties

**Revised:** December 2022

---

In case of a fire, follow the steps listed below:

If the fire is contained to your unit and you can get out safely, pull the fire alarm or go to a neighbor and call 911 immediately.

## ***First Floor Residents***

- First try to evacuate using your front door. Feel the door for warmth and touch the doorknob. If it is very hot, there may be fire on the outside of your door. In that case it may not be safe for you to exit this way.
- Go to the window and knock out the screen to evacuate.
- Keep low to the ground (smoke rises) and if possible cover your mouth and nose with a wet cloth to filter the smoke until help arrives.
- If you are unable to evacuate and smoke begins to come in under the door, stuff blankets or towels (preferably wet) under the door to prevent the smoke from coming in. Wave a brightly colored article of clothing or similar material in the window to attract attention.

## ***Second Floor Residents***

- First try to evacuate using your front door. Feel the door for warmth and touch the doorknob. If it is very hot, there may be fire on the outside of your door. In that case it may not be safe for you to exit this way.
- You then must go to your window and open it for ventilation. Push out the screen if you have to. Hang a sheet outside of your window. This will let emergency services know that you are trapped inside of your apartment.
- Keep low to the ground (smoke rises) and if possible cover your mouth and nose with a wet cloth to filter the smoke until help arrives.

## ***If you are in the basement***

- First try to evacuate using the side door on the stairway landing. Feel the door for warmth and touch the doorknob. If it is very hot, there may be fire on the outside of your door. In that case it may not be safe for you to exit this way.
- You must then go to the door that leads to the first floor. Feel the door for warmth and touch the doorknob. If it is very hot, there may be a fire outside your door. In that case it may not be safe for you to exit this way. Go back down to the basement, attempt to use the window to exit.

- You then must go to a window and open it for ventilation. Push out the screen if you have to. Hang a sheet or piece of cloth outside of the window. This will let the emergency services know that you are trapped inside of your house.
- Keep low to the ground (smoke rises) and if possible cover your mouth and nose with a wet cloth to filter the smoke until help arrives.

An Incident Commander or Health and Safety Officer shall be assigned to assist residents in case of an evacuation. Their responsibilities will include:

- Taking a head count of residents and report information to the emergency services
- Assist residents in remaining orderly
- Encourage residents to stay away from the building
- Report safety issues to Health and Safety Committee
- **All residents** should meet at the front of the building, away from the emergency services staff (clear of fire trucks, emergency equipment and any medical treatments being given to the injured)
- **Do not re-enter the building, until:**
  1. The fire alarm has been silenced, and
  2. The fire or police department has indicated that it is acceptable to re-enter.

# EMERGENCY ACTION PLAN: SEVERE WEATHER PLAN

---

All Independence Center facilities shall maintain an electronic device on site with a NOAA approved weather app. If a severe weather condition is reported or is evident the following plan shall be implemented.

Scope: All Staff

Page 1 of 1

Site: Main Site and 1730 Washington Street Office Area

Revised: December 2022

---

## ALERT: CODE YELLOW

When a severe weather **watch** is given the person receiving the alert shall notify the Health and Safety Officer or Incident Commander. The Incident Commander shall:

- Notify all staff in the facility.
- Instruct staff to close all blinds and windows.
- Prepare for worsening weather.
- Designate a staff member to remain at weather notification location.

When a severe weather **warning** is given the person receiving the warning shall sound the severe weather alert: **Code Yellow**

- When alert is given all persons shall go to the lowest level of the facility away from all external walls and windows unless it is a flash flood situation.
- Staff shall bring flashlights and insure all persons in the building are assisted to the designated area (flashlights are located by each first aid kit).
- The Receptionist or his/her designee shall be responsible to bring any extra flashlights and the first aid kit to the designated area in the building.
- **NO** Independence Center vehicles shall leave the facility during a severe weather warning.

All persons in the building shall remain in the designated area until the all-clear designation has been given by the Incident Commander. If a medical Emergency occurs with any member, staff or visitor:

- Emergency assistance will be given to the extent possible (first aid).
- 911 will be contacted for assistance if necessary.
- The person will be taken to the nearest Emergency room, by EMT's, if needed.
- A written Incident Report will be completed by the staff person involved no later than 24 hours after the incident.

If the severe weather watch or warning is indicated with advance notice:

- Every effort should be made to transport members home prior to severe weather arrival.
- Areas of the facility that can be closed, shall send personnel home and areas that remain open shall follow the severe weather protocol.
- Staff with members off site should transport members home if time allows or transport to nearest municipal storm shelter or follow designated Emergency Action Plan protocol of business or facility.
- If severe weather strikes suddenly when personnel and members are in a vehicle or outdoors staff should not try to outrun the storm, but pull over and instruct all personnel and members to find lowest ground possible such as a ditch and lie down as low as possible, if no other shelter is available.

### **Preparedness**

A test of this plan shall be conducted annually.

# EMERGENCY ACTION PLAN: RESIDENTIAL SEVERE WEATHER PLAN

---

**Policy:** All Independence Center facilities shall maintain a working electronic device with a NOAA approved weather App. If a severe weather condition is reported or is evident the following plan shall be implemented.

**Scope:** All Staff

Page 1 of 2

**Site:** Independence Center Residential Properties

**Revised:** May 2021

---

## **Tornado:**

In the event of a tornado warning, residents should do as follows:

### **1730 Washington St., 2835-2839 Washington and Indiana Street Properties:**

- **First and Second Floor Residents**
  - Residents should go to their bathrooms, shut the door, and lie in the tub.
  - Stay away from windows, doors and outside walls
  - Squat low to the ground
  - Place your hands on your knees with your head between them
  - Make yourself the smallest target
  - Listen for instructions on when it is safe to come out

### **Eliza T. Davies Apartments:**

- **First Floor Residents**
  - Residents should go to their bathrooms, shut the door, and lay in the tub.
  - Stay away from windows, doors and outside walls
  - Squat low to the ground
  - Place your hands on your knees with your head between them
  - Make yourself the smallest target
  - Listen for instructions on when it is safe to come out
- **Second Floor Residents**
  - Go to the laundry room immediately
  - If you cannot make it to the laundry room, residents should go to their bathrooms, shut the door, and lie in the tub
  - Stay away from windows, doors and outside walls
  - Squat low to the ground
  - Place your hands on your knees with your head between them
  - Make yourself the smallest target
  - Listen for instructions on when it is safe to come out

# **EMERGENCY ACTION PLAN: EARTHQUAKE PLAN**

---

**Policy:** All Independence Center facilities shall maintain a working electronic device with a NOAA approved weather app. If an earthquake is reported or is evident the following plan shall be implemented.

**Scope:** All Staff

Page 1 of 1

**Site:** All Sites

**Revised:** May 2021

---

## **ALERT: CODE YELLOW**

### ***Procedure***

- If you are indoors, drop and take cover under a sturdy table or other furniture. Hold on to it and stay put until the shaking stops.
- Stay clear of items that can fall and injure you.
- Stay inside, avoid windows and other potentially harmful objects/fixtures. As you may be injured by breaking glass and falling objects.
- If you are at the lake, walk to higher ground away from the lake as soon as it is safe for you to move.
- If you are driving, move your car as far out of the normal traffic pattern as possible and stop if it is safe. Stay away from structures or objects that could fall on you, such as bridges, overpasses, light posts, power lines, or trees. Stay inside your car.
- If you are near unstable slopes, be alert for falling rocks, trees, seiches or landslides that could be caused by the earthquake.

### ***Preparedness***

A test of this plan shall be conducted annually.



# EMERGENCY ACTION PLAN: FLOOD

---

**Policy:** All Independence Center facilities shall maintain a working electronic device with a NOAA approved weather app. If a flood is reported or is evident the following plan shall be implemented.

**Scope:** All Staff

Page 1 of 1

**Site:** Office Locations

**Revised:** December 2022

---

## ALERT: CODE YELLOW

### Definitions:

**Flash Flood WATCH** issued when conditions look favorable for flash flooding. A WATCH usually encompasses several counties. This is the time to start thinking about your plan of action and where you would go if water begins to rise.

**Flash Flood WARNING** issued when dangerous flash flooding is happening or will happen soon. A WARNING is usually a smaller, more specific area. This can be issued due to excessive heavy rain or a dam/levee failure. This is when you must act quickly as flash floods are an imminent threat to you and your family. You may only have seconds to move to higher ground.

**Flash Flood EMERGENCY** issued for the EXCEEDINGLY RARE situations when extremely heavy rain is leading to a severe threat to human life and CATASTROPHIC DAMAGE from a flash flood is happening or will happen soon. Typically, emergency officials are reporting LIFE THREATENING water rises resulting in water rescues/evacuations.

### If a Flash Flood Warning/Emergency is issued for your area:

- Drive only if absolutely necessary. Do not attempt to drive through a flooded road. The depth of the water is not always obvious. The road bed may be washed out under the water, and you could be stranded or trapped.
- Never drive around a barricade, which is there for your protection. Be especially cautious at night, when it is harder to recognize flood dangers.
- If you come upon a flowing stream where fast-moving water is above your ankles, turn around, don't drown. Six inches of swift-moving water can knock you off your feet. Many people are swept away wading through flood waters, resulting in injury or death.
- IF ADVISED TO EVACUATE DO SO IMMEDIATELY. Evacuation Wardens will initiate this process.
- Notify Incident Commander

When a FLASH FLOOD/FLOOD **WARNING/CODE YELLOW** is given, The Incident Commander shall begin assessment of the situation and determine what appropriate steps need to be taken. If an evacuation is required the Incident Commander shall immediately alert the Evacuation Wardens. The Evacuation Wardens shall bring with them any extra flashlights, the first aid kit, appointment books /sign-in sheet and the battery powered radio. All staff shall bring their flashlights and ensure everyone is assisted to the designated area. At the sound of the alert EVERYONE shall immediately go to designated shelter and the Emergency Action Plan for [Emergency Action Plan: Handling of Evacuees](#) and/or [Emergency Action Plan: Temporary Shelter](#) shall be put in place.

### **Preparedness**

A test of this plan shall be conducted annually.

# EMERGENCY ACTION PLAN: RESIDENTIAL FLOOD

---

<b>Policy:</b>	All Independence Center facilities shall maintain a electronic device with a NOAA approved weather app. If a flood is reported or is evident the following plan shall be implemented.	
<b>Scope:</b>	All Staff and Residents	Page 1 of 1
<b>Site:</b>	Independence Center Residential Properties	
<b>Revised:</b>	May 2021	

---

In the event of a flood warning the residents shall:

## ***Procedures***

- Find safe shelter right away.
- Do not walk, swim or drive through flood waters. The flow of water and undercurrents are dangerous.
- Do not touch any exposed or wet electrical wires.
- Do listen for alarms from the city of Waukegan or staff of Independence Center
- Do not drink tap water or eat any food contaminated by the floodwater.
- Depending on the type of flooding:
  - Move to high ground or higher floor. Remain calm.
  - Stay where you are.
  - Evacuate if told to do so.

## ***First Floor Residents***

If you are advised to evacuate your home and move to another location temporarily, the Shelter Manager will determine the evacuation shelter site.

In the event you are caught in a flood, evacuate to a higher ground. Evacuate to the second floor and pair off with a neighbor until help arrives.

## ***Second Floor Residents***

Remain on higher ground. If you are advised to evacuate your home and move to another location temporarily, the Shelter Manager will determine the evacuation shelter site.

# EMERGENCY ACTION PLAN: WINTER STORM

---

**Policy:** All Independence Center facilities shall maintain a working electronic device with a NOAA approved weather App. If a severe weather condition is reported or is evident the following plan shall be implemented.

**Scope:** All Staff

Page 1 of 2

**Site:** Independence Center Residential Properties

**Revised:** May 2021

---

## Definitions:

- **Wind Chill Advisory** - dangerous wind chills of 15 below to 24 below zero are expected.
- **Wind Chill Warning** - potentially life-threatening wind chills of 25 below zero or colder are expected.
- **Frost Advisory** - damaging frost is expected during the growing season.
- **Freeze Warning** - below freezing temperatures are expected during the growing season.
- **Ice Storm Warning** - dangerous accumulations of ice will occur and are expected to result in hazardous travel, extended power outages, and damage to trees.
- **Heavy Snow Warning** - snow accumulations of six inches or greater, which will result in hazardous travel conditions.
- **Winter Weather Advisory** - cold, ice, and/or snow (two to five inches) are expected.
- **Winter Storm Watch** - severe winter weather, such as heavy snow or ice, is possible within the next day or two.
- **Winter Storm Warning** - severe ice and/or snow (six inches or more) have begun or are about to begin.
- **Blizzard Warning** - heavy snow and strong winds will produce a blinding snow, near zero visibility, deep drifts, and life-threatening travel condition

## Winter Storm Transportation Procedures

- Make sure Center vehicles are in good operating condition before using them in extreme cold.
- Never utilize a vehicle that does not have at least a half a tank of gas. If your trip will leave you with less than a quarter tank of gas, it must be refilled.
- Maintain a storm kit in your car.
- Plan your trip carefully. If cold, snowy, or icy conditions exceed your ability or your car's ability, don't travel. If you must travel be cautious.
- Tell someone about your travel plans.
- Never leave the motor running in a vehicle parked in an enclosed or partially enclosed space, such as a garage.
- Dress appropriately for the winter.
- Avoid overexertion, such as shoveling heavy snow, pushing a car or walking in deep snow.
- The strain from the cold and the hard labor of snow shoveling could cause a heart attack at any age – a major cause of death in the winter. Don't ignore chest pain or tightness in your chest.

### **If you become stranded outdoors, seek shelter to stay dry:**

- Pull as far off the road as possible, set your hazard lights to “flashing,” and hang or tie a colored cloth (preferably red) to your antenna, window or door. After the snow stops falling, raise the hood to indicate trouble. If you have a cell phone, call for help.
- Stay in your vehicle, where rescuers are most likely to find you. Do not set out on foot unless you can see a building close by where you know you can take shelter.
- Make sure the exhaust pipe is not blocked by snow, and then run the engine and heater about 10 minutes each hour to keep warm. Turn on the dome light at night when running the engine. When the engine is running, open a window slightly for ventilation. Periodically clear away snow from the exhaust pipe.
- Watch for signs of frostbite and hypothermia in passengers and yourself.
- Immediately seek medical attention. If medical help is not immediately available, slowly warm the affected areas.

### **If Stranded**

- Exercise to keep blood circulating and to maintain body heat by vigorously moving arms, legs, fingers and toes. In extreme cold, or if you don't have a Winter Storm Survival Kit, use road maps, seat covers and floor mats for insulation.
- Take turns sleeping. One person should be awake at all times to watch for rescue crews.
- Be careful not to deplete battery power. Balance electrical energy needs such as lights, heat and radio, with electrical energy supply.

### **On the Road**

- Buckle your seat belts!
- Be prepared to turn back and seek shelter if conditions become threatening.
- Keep your windows clear of snow and ice. Do not start driving until your windshield is defrosted.
- Drive slower and increase your following distance. Your speed should be adjusted for the conditions and match the flow of traffic.
- Only use a cell phone if you are safely over to the side of the road or in a parking lot. Never talk on a cell phone while driving. This is especially dangerous in winter weather conditions.
- Roadway conditions may vary depending on the sun, shade or roadway surface. Watch for slick spots especially under bridges, on overpasses and in shaded areas.
- If the pavement is snow or ice covered, start slowly and brake gently. Begin braking early when you come to an intersection.
- If you start to slide, ease off the gas pedal or brakes. Steer into the direction of the skid until you feel you have regained traction, and then straighten your vehicle.
- If your vehicle becomes stuck in the snow, contact a towing company, but be prepared to wait in the cold weather for up to several hours. If you can be safely pulled out by another vehicle, make sure you use tow ropes with loops on the ends. Avoid chains or hooks if at all possible, since these can slip off and recoil very quickly, causing injury or death.
- When a snowplow is coming toward you, allow plenty of room for the truck to pass. When the center line is being cleared and salted, the plow tip may be on or over the line.
- When you approach a snowplow from behind, pass with care and only when you can see the road ahead of the truck. You should not try to pass in blowing snow; there may be a vehicle in that cloud of snow. Allow more distance than usual between you and the plow.

- Refuel often, keeping your gas tank near full to prevent ice in the tank and fuel lines, which could leave you stranded.
- These frequent stops should also help relieve tense muscles.

Consult Incident commanders for planned closures, early closing, or community outing cancellations Center due to snow, ice, or extreme cold.

# EMERGENCY ACTION PLAN: INTERNAL DISASTERS

---

**Policy:** If an internal disaster is reported or evident in the area, the person discovering the disaster will sound the alert. Staff at the site shall implement internal disaster procedures detailed in this internal disaster Emergency Action Plan.

**Scope:** All Staff

Page 1 of 1

**Site:** All Sites

**Revised:** December 2022

---

## **ALERT: CODE ORANGE**

An Internal Disaster is any event or incident where the safety of any person within the Center is compromised, not otherwise covered in any other Emergency Action Plan. An event such as an explosion or a wall falling down resulting in internal casualties or circumstances may constitute an internal disaster. If the situation requires the evacuation of members, such evacuation will be coordinated with emergency services personnel.

### ***Procedures***

- The person who discovers this internal threat should remain calm
- He/she should summon help by using the established alert **CODE ORANGE**. Area affected by Code Orange will be described.
- 911 shall be called if situation warrants such
- The area shall be cleared of all members, visitors and non-essential personnel
- All persons should remain in designated areas away from Code Orange area until the “all clear” has been given by the Incident Commander
- If an internal disaster disables the Independence Center’s essential utility services, the Independence Center Emergency Action Plan Director will determine whether a contracted service will be used so that reserve utility provisions such as emergency power can be provided. Emergency power will be limited to providing temporary lighting so staff can perform essential functions, such as securing the doors of the Independence Center, backing up computer data, and obtaining urgent medical data to provide to a primary care physician.

### ***Preparedness***

A test of this plan should be completed annually. An internal training should be conducted annually for staff and members.

# EMERGENCY ACTION PLAN: BIOHAZARDOUS INCIDENTS

---

**Policy:** If a biohazardous incident is reported or evident in the area, the person discovering the incident will sound the alert. Staff at the site shall implement biohazard procedures detailed in this biohazardous incident Emergency Action Plan.

**Scope:** All Staff

Page 1 of 1

**Site:** All Sites

**Revised:** March 2018

---

## **ALERT: CODE ORANGE**

A biohazard incident is an accident, injury, spill or near miss that involves biological material

Examples of biological materials include:

- Human Materials: cells, tissues, organs other than intact skin, cultured media, blood, semen, vaginal secretions, saliva in dental procedures, cerebrospinal fluid, synovial, pleural, pericardial, peritoneal and amniotic fluids, body fluids visibly contaminated with blood, along with body fluids where it is difficult or impossible to differentiate between body fluids
- Infectious or pathogenic agents: bacteria, viruses, fungi, prions, protozoa and worms

Examples of biohazardous incidents include:

- Human or animal bites or scratches
- Needle sticks, cuts, scrapes or other sharps injuries
- Spills of potentially infectious materials
- Exposures to aerosols or liquids containing potentially infectious materials
- Unexplained fever or illness
- Personal protective equipment failure
- Splashes to the face, mucous membranes or open wounds with potentially infectious materials

### ***Procedures***

- The person who discovers this biohazardous incident should remain calm
- He/she should summon help by using the established alert **CODE ORANGE**. Area affected by Code Orange will be described.
- 911 shall be called if situation warrants such
- First Aid should be administered to any individuals exposed to biological materials (See First Aid Plan)
- Universal/Standard Precautions and Infection Control procedures should be followed when rendering first aid and cleaning up any biological materials (See Universal/Standard Precautions and Infection Control Procedures)
- The area shall be cleared of all members, visitors and non-essential personnel
- All persons should remain in designated areas away from Code Orange area until the “all clear” has been given by the Incident Commander
- Personnel who are exposed to a biohazard on the job, but require less than paramedic care, should go to the Corporate Health Program at Vista Medical Center and identify themselves as employees of Independence Center. This program is only available to personnel.

# EMERGENCY ACTION PLAN: LOSS OF FACILITY

---

**Policy:** In the event of loss of electricity, water, gas, other fuel and/or heating (below 70°F awake, 62°F sleeping) or air conditioning (above 85°F) staff at the facility shall implement the procedures detailed in this plan.

**Scope:** All Staff

Page 1 of 2

**Site:** All Sites

**Revised:** December 2022

---

## ***Procedures***

- Report problem to appropriate utility company or repair person and Incident Commander
- Contact the Incident Commander, on-call Independence Center staff, or call Living Room Wellness Center phone # (888) 707-1614
- Obtain extra staff if needed
- If necessary, all staff and consumers shall evacuate to the temporary shelter. Shelter Managers and Evacuation Wardens will coordinate those efforts.

Temporary Shelter: **Waukegan Park District, 2000 Belvidere Rd., Waukegan, IL 60085, (847) 360-4700** (if occupancy allows)

The Shelter Manager shall bring to the shelter site:

- First Aid Kit
- Portable radio, weather radio, or electronic device with comparable applications
- Flashlight
- Member sign-in sheet

## ***Preparedness***

A test of this plan shall be conducted annually.

## ***Other Considerations***

In the event one of the Independence Center sites cannot be utilized for more than a week's duration, Independence Center will set up a space to provide the unusable sites functions in another Independence Center facility. In the event the loss of the facility is longer than one month's duration, Independence Center will utilize its insurance for disruption of business to secure a temporary facility for operation. When possible, the meeting rooms at the English Manor, 1730 Washington Street, Waukegan, IL 60085, will be used. The Network Manager at the Department of Human Services Division of mental health will be contacted to obtain approval to provide services at the temporary site. Any temporary site must meet the safety requirements of the Department of Human Services and Medicaid. Any such temporary site will be inspected by licensed and bonded plumbers, electricians, and the local Fire Marshall prior to obtaining approval for operations.



# **EMERGENCY ACTION PLAN: MISSING RESIDENT/PERSONS SERVED**

---

**Policy:** If a resident/person served is considered missing the staff shall enact the following procedure. The person in charge shall activate the procedures.

**Scope:** All Staff

Page 1 of 1

**Site:** All Sites

**Revised:** December 2022

---

## ***Procedures***

- Inspect entire facility and grounds
- Notify supervisor
- Call in extra staff as needed
- Call 911
- Provide picture identification if available
- Provide any necessary medical history information
- Call Independence Center Incident Commander or **Living Room Wellness Center 888-707-1614**
- Notify parent or guardian if applicable

## ***Preparedness***

A test of this plan shall be conducted annually.

# EMERGENCY ACTION PLAN: NATURAL GAS LEAK

---

**Policy:** All Independence Center facilities using natural gas shall maintain an Emergency Action Plan addressing gas leaks. In the event of a gas leak the Health and Safety Officer or person in charge shall implement the procedure outlined in this plan.

**Scope:** All Staff

Page 1 of 1

**Site:** All Sites

**Revised:** December 2022

---

## *Procedures*

### **IF YOU SMELL A FAINT ODOR OF GAS:**

- Investigate immediately
- Call gas utility company using an external telephone

### **IF A STRONG OR PERSISTENT ODOR OF GAS IS PRESENT or IF YOU HEAR A HISSING SOUND OF ESCAPING GAS**

- Evacuate the facility immediately
- Leave the door(s) open
- Outside use a cellular or neighbor's phone to call gas company: **North Shore Gas: 1-866-556-6005 GAS LEAKS**
- DO NOT operate any electrical switches, appliance controls, or pull any plugs from outlets
- DO NOT crank cars under attached car ports/garages
- DO NOT use the telephone in the building
- The gas company will close the shut-off valve near the gas meter. Do not turn valve back on until instructed to do so.
- Notify supervisor

### **IF YOU SMELL OR DETECT NATURAL GAS OUTSIDE CALL THE GAS COMPANY IMMEDIATELY:**

**North Shore Gas-GAS LEAKS: 1-866-556-6005 or 1-866-566-6004 for general information.**

### ***Preparedness:***

A test of this plan shall be conducted annually.

# EMERGENCY ACTION PLAN: SECURING INCIDENT SCENES

---

**Policy:** In the event of an incident, staff of the Independence Center shall use the following procedures for securing the scene of the incident when necessary.

**Scope:** All Staff

Page 1 of 2

**Revised:** December 2022

---

## ***Procedures***

Isolation of the incident scene must begin when the emergency is discovered. If possible, discoverers shall secure the scene and control access. However, no one shall be placed in physical danger for these functions. The Health and Safety Officer and Incident Commander shall be notified.

Personnel first response responsibilities:

- Protection and care for injured or vulnerable
- Reporting for needed Emergency Action Plan response
- Reporting to the Incident Commander for assignment of responsibilities
- Identifying and separating witnesses as needed
- Securing the incident scene if necessary
  1. Closing doors or windows
  2. Establishing temporary barriers with furniture, after people have safely evacuated. Dropping containment materials (absorbent pads, etc. in the path of leaky materials).
  3. Closing file cabinets or desk drawers
  4. Erecting barriers with caution tape

Only trained personnel should be allowed to perform security measures for the facility. The incident scene should be limited to persons directly involved in the response.

The Independence Center's Incident Commanders will be responsible for the assignment of incident handling responsibilities.

- Reporting to outside agency (including call to OIG)
  - Independence Center OIG investigator shall determine investigative responsibilities:
    1. Jurisdiction
    2. Acceptance decision
    3. Early involvement of the responsible investigator
  - Preserving evidence
    1. Physical examinations

2. Photographs/diagrams
3. Copy or impound relevant documents
4. Taking witness statements

#### Investigative Responsibilities

- Independence Center's OIG investigator will determine role when investigation is being conducted by an entity in addition to the Independence Center's investigator.
- Investigator will ensure objectivity

#### Investigative methodology

- Selection of witnesses and testimonial evidence
- Documentary evidence
- Physical evidence
- Demonstrative evidence

#### Maintaining the chain of custody

#### Concluding the investigation

- OIG investigator will give expectations related to time until investigation is completed
- Investigator will also give expectations related to manner of submitting investigative reports
  1. Essential elements of the report
  2. To whom the report is submitted to
  3. The manner and duration of record maintenance

#### ***Procedures for taking actions based on reports submitted***

The Emergency Action Plan Director, in conjunction with the OIG investigator, will determine procedure for taking actions based on reports submitted.

- For concluding investigative outcome
- For determining actions to be taken

#### ***Procedures for review, due process and appeal***

We will follow Independence Center procedures for due process, review and appeal.

# **EMERGENCY ACTION PLAN: WORKPLACE VIOLENCE**

---

**Policy:** If a person is violating behavioral expectations of Independence Center or acting in a violent manner or the code gray is announced or sounded, the staff at the site shall implement workplace violence procedures detailed in this Emergency Action Plan.

**Scope:** All Staff

Page 1 of 1

**Site:** All Sites

**Revised:** June 2021

---

## **ALERT: CODE GRAY**

### ***Procedures***

- Personnel should remain calm.
- He/she shall summon help using established alert **CODE GRAY** and the area affected will be described.
- The area shall be cleared of all members, visitors and non-essential personnel.
- Personnel should attempt to deescalate behavior before it poses an imminent risk of physical harm to self or others uses techniques outlined in Pro-Act training.
- All available staff should report to the code gray area.
- 911 shall be called if the situation warrants such.
- All personnel should remain in their assigned areas until the all clear has been given by the Incident Commander.

### ***Preparedness***

A test of this plan shall be completed annually. A workplace violence prevention training shall be conducted upon hire and annually for staff and interested members.

# **EMERGENCY ACTION PLAN: EVACUATION PROCEDURES**

---

**Policy:** The Independence Center will have a safe and effective method of removing person from the Independence Center in the event of an emergency.

**Site:** All Sites

Page 1 of 2

**Revised:** December 2022

---

If the situation requires the evacuation of members, such evacuation will be coordinated with emergency services personnel.

It is the responsibility of the Independence Center Emergency Action Plan Director or his or her designee to activate the Emergency Action Plan Preparedness Plan.

In the event that total evacuation of the Independence Center is necessary, the Health and Safety Officer or his or her designee will assume the responsibility for Independence Center evacuation. Each member will be rated as to the type of transportation necessary: Ambulatory, Ambulatory with Assistance, Wheelchair.

If the disaster disables the Independence Center's essential utility services, the Independence Center Emergency Action Plan Director will determine whether a contracted service will be used so that reserve utility provisions such as emergency power can be provided. Emergency power will be limited to providing temporary lighting so staff can perform essential functions, such as securing the doors of the Independence Center, backing up computer data, and obtaining urgent medical data to provide to a primary care physician.

All Independence Center sites have an evacuation plan posted in a common area for members, guests, and staff.

Exits will be presented to new members, guests and staff during tours of Independence Center facilities.

Drills will be conducted on an annual basis which will require evacuation skills to be utilized and provide for a learning experience.

Staff will be trained on proper techniques for handling evacuees and will follow the following evacuation protocol.

If an alarm or page over the Center's intercom system saying "Code" followed by "evacuate" is announced all staff are instructed to get ambulatory persons out of the building. Ambulatory persons are instructed to leave via the nearest exit that is unobstructed by the Emergency Action Plan at hand. Staff persons are to remain calm and refrain from yelling or otherwise inciting panic.

An Evacuation Warden will obtain the Center's sign-in sheet for the purpose of accounting for all those present in the facility. The Evacuation Warden will account for the location of personnel.

Shelter Managers will contact potential shelter sites to obtain approval for use of the shelter site.

The Evacuation Wardens will assist members and staff with proper exiting and regrouping procedures.

After ambulatory persons are evacuated, staff will assist those who are non-ambulatory in evacuating the facility.

Evacuees will meet at far end of the parking lot to be accounted for. Evacuees shall be instructed to go to a temporary shelter if necessary. The following facility may be used as a temporary shelter: Waukegan Park District, 2000 Belvidere Road, Waukegan, IL 60085, (847)360-4700. Ambulatory evacuees will be instructed to follow staff on foot to the

shelter. Non-ambulatory evacuees will be assisted to the facility via available transportation. The Evacuation Wardens will do one last check of the building to ensure no one is left.

At the shelter, evacuees will be accounted for once again. A report will be given to any emergency service providers involved indicating those unaccounted for, or requiring additional medical attention.

Residential facilities will be contacted. Transportation will be arranged to residential facilities, if necessary.

A debriefing will be conducted as soon as the situation is resolved.

# EMERGENCY ACTION PLAN: HANDLING OF EVACUEES

---

**Policy:** If the facility (site) is to be evacuated the staff in charge at the time of the evacuation shall implement the Evacuation Plan. If accommodations/directions for evacuation are detailed in other Emergency Action Plans the evacuation shall follow the listed guidelines in that plan, for other evacuations follow specific guidelines listed below.

**Scope:** All Staff

Page 1 of 1

**Site:** All Sites

**Revised:** December 2022

---

## ***Procedures***

- Each facility shall have on site, in the Health & Safety Manual, an Emergency Action Plan for Temporary Shelter
- Each staff person assigned to the facility shall be familiar with the Emergency Action Plans for Handling of Evacuees and Temporary Shelter.

The Incident Commander shall notify Evacuation Wardens and Shelter Managers of the need to evacuate the building. The Evacuation Wardens will carry out the Center evacuation plan detailed in the Independence Center's Emergency Action Plans.

When the alert is given to evacuate the building, all persons shall evacuate and assemble at the designated area.

Procedures detailed in specific Emergency Action Plans shall be followed.

All Evacuation/Emergency Action Plans shall detail the evacuation procedures for persons with disabilities specific to that facility.

All appropriate management and others, including guardians of persons served shall be notified if the need for temporary shelter arises.

**Note:** See policies on Emergency Action Plan including [Emergency Action Plan: Handling of Evacuees](#) and [Emergency Action Plan: Temporary Shelter](#).



# EMERGENCY ACTION PLAN: TEMPORARY SHELTER

---

**Policy:** Each Independence Center site shall have a pre-arranged agreement for the temporary sheltering of consumers, staff and others in the event of an extended evacuation of an agency facility.

**Scope:** All Staff

Page 1 of 2

**Site:** All Sites

**Revised:** December 2022

---

## *Procedures*

The Shelter Managers will call shelter sites to obtain approval for temporary shelter and inform Incident Commanders of shelter approval.

The site shall provide for the following:

- Shelter from the elements
- Phone access
- Restrooms
- Safe drinking water
- Handicapped facilities (if applicable)

The Independence Center facility and temporary shelter site shall have a written agreement as to the use of the site for temporary shelter. All financial considerations, if any, shall be listed in this agreement. This agreement shall be approved by the Emergency Action Plan Director or his designee. This written agreement shall be on file at the facility and the shelter site.

Each Independence Center facility shall define the procedure for removal and safekeeping of records and other items from the facility. This procedure shall be made a part of this plan. At no time should the retrieval of such items compromise the safety of any person.

All appropriate management, Emergency Action Plan entities and guardians of persons served shall be notified that the Temporary Shelter Plan is in use.

### **TEMPORARY SHELTER SITE:**

**Waukegan Park District, 2000 Belvidere Road, Waukegan, IL 60085, (847)360-4700**

## **Housing Program**

In case any of the Center's housing locations are damaged to the extent that they are considered by the staff person responding to the emergency to be uninhabitable, the resident(s) will gather at the Independence Center and the following steps will be taken:

- The resident will be asked if he/she could make temporary arrangements to stay with friends or relatives until their unit is repaired.
- If there are vacant units that are suitably furnished, these will be used to house displaced persons.

- If no suitable vacant units are available residents from other units will be asked if the displaced resident could stay as a “guest” until other arrangements could be made or the unit could be repaired.
- If satisfactory plans cannot be made to shelter the displaced individual(s) using Center facilities, then the displaced person(s) will be housed in a motel of the Center’s choosing.

### **Continuation of Services**

If the main Independence Center facility is unusable for a period of more than a day, staff will attempt to contact members and inform them of alternative plans for programming. The Center’s two off-site offices will be the main point of coordination of services.

Even though the current level of programming could not be offered by the Center the following services would continue:

- Vocational support including job coaching, transportation and the community supports.
- Crisis intervention\*
- Community support and case management services that could be held away from the Center facility.
- Residential services\*

\*These are considered “essential services”.

A limited number of members could assist at the off-site office with efforts to keep other members informed of changing situations regarding the facility and programming. For example, helping get the newsletter out, calling members or answering phones.

# EMERGENCY ACTION PLAN: DEBRIEFINGS

---

**Policy:** It is the Independence Center’s policy to debrief persons served and staff to prevent or minimize unnecessary acute stress disorders that sometimes result from Emergency Action Plan incidents.

**Scope:** All Staff

Page 1 of 1

**Site:** All Sites

**Revised:** May 2016

---

## ***Procedure***

The following steps will be followed after critical incidents:

- Management team will meet following critical incidents in order to plan and identify steps to be taken during the debriefing.
- Personnel will be debriefed and given instructions on how to proceed.
- Persons served effected by such critical incidents will also be debriefed

All groups effected by the incident will be debriefed within 72 hours of the critical incident

- When appropriate, outside professionals may be brought in for further psychological support as approved by the Executive Director.

# **EMERGENCY ACTION PLAN: DEBRIEFING- ROOT CAUSE ANALYSIS**

---

**Policy:** It is the Independence Center’s policy to conduct a root cause analysis of all incidents for the purpose of minimizing and decreasing recurrence of incidents

**Scope:** All Staff

Page 1 of 1

**Site:** All Sites

**Revised:** May 2016

---

## ***Procedure***

The following steps will be followed after incidents:

- All incidents will be subjected to root cause analysis at monthly management team meetings.
- The results of this analysis shall be disseminated at team meetings and with personnel.
- Recommendations for improving training, protocols and quality improvement will be disseminated at team meetings and with personnel.

# UNUSUAL CRITICAL INCIDENTS

---

**Policy:** The Independence Center personnel will report all unusual critical incidences.

**Scope:** All Staff

Page 1 of 4

**Revised:** December 2022

---

Every effort will be made to prevent incidents from occurring at Independence Center, at any of the residential facilities, on Center vehicles or during Center sponsored outing and field trips. Staff should constantly be aware of persons of the center who are not feeling well or who are demonstrating unusual behavior. If a potential problem is noted, staff should inform other staff and try to de-escalate the situation before an incident occurs.

One staff person should be on each level of the Center at all times. If this is not possible, then one of the levels should be closed to members and locked. This practice assures that incidents will not occur at unattended areas of the Center.

In cases where incidents are unavoidable, one staff person should be the principle person to handle the incident and other staff should contact additional help if needed.

In dealing with unusual incident, safety of all involved is the key factor. If there is a question as to whether or not to call emergency services, call first and worry about it later.

Handle unusual critical incidents as soon as they occur. Many incidents can be avoided by early intervention.

After the incident is resolved, the repercussions on other individuals should be considered. For example, should potential victims be warned? Is an injured individual in need of follow-up care? Is voluntary or involuntary hospitalization needed to protect an individual or the persons he/she will come in contact with? These and other concerns should be documented in an incident report by a staff person and shared with his/her supervisor once the immediate incident has subsided.

Most unusual critical incidents can be upsetting to both staff and persons served. Supervisory staff should evaluate on a case by case basis the need to "de-brief" the individuals involved and to engage in discussion to process the incident and support and reassure the persons affected.

In reviewing the unusual incident, the Executive Director will evaluate all aspects of the event, including:

- How could this event have been prevented?
- Was it handled appropriately?
- Did staff demonstrate skill, training and good judgment in dealing with the problem?
- What remedial actions are required?

An unusual critical incident is one in which:

- The police needed to be called due to violence or aggression
- An ambulance needs to be called
- A person served, staff person or visitor is injured by Center equipment, machinery or vehicles
- A person served, staff person or visitor is exposed to a communicable disease or infection
- A person served, staff member or visitor is injured while on Center property
- A person served needs to be asked to leave the building due to inappropriate behavior

- A weapon is brought onto Independence Center property.
- A person served leaves the area and is unaccounted for or is lost during a Center sponsored outing or field trip
- Illicit drugs of any kind are found, possessed or used on Independence Center property, or the unauthorized use or possession of licit substances
- Alleged violations of rights of persons served or the Center's Code of Ethics (see Grievance Policy)
- Allegations of abuse, fraud, corporate misdoings and privacy violations
- Allegations of fiduciary abuse, neglect or exploitation
- A person served, staff person or visitor is exposed to a biohazard or involved in biohazard accident
- A person served reports that he/she has had a medication error (e.g. taken the wrong medication/ dose)
- Self-injurious behavior, suicide attempts, suicides or deaths of any kind
- Other areas of concern, anxiety or apprehension. If in doubt, complete an incident report or consult with you supervisor.
- Wandering or elopement
- Vehicular incidents
- Sexual assault
- Other sentinel events

Incident Reports: will be completed by the staff person who was involved or who witnessed the incident using [Incident Tracker software](#). If the incident was observed by two or more staff, then either can be completed by either staff person. The Executive Director or in their absence, the Assistant Director, will review the report in order to assure that the incident was handled appropriately and to recommend additional actions to be taken in order to assure the safety of all involved. The Executive Director will make sure that staff have met all internal and external reporting requirements. Incident Reports will be reviewed a second time by the Management Team on a monthly basis. The Executive Director will examine all incident reports each year to evaluate any trends in the causes of the incidents.

Remedial Actions: The Executive Director will note any need to act to prevent the incidents that occurred from occurring again. Actions that the Executive Director can take may include recommendations for in-service education, risk management and prevention.

The Center's Board of Directors will be made aware of unusual incidents as necessary by the Executive Director's report at the quarterly Board meeting and the yearly performance review.

In handling the incident, staff will use the following guidelines:

**Personal Injury:**

It is important to note that all injuries are considered "critical" and therefore require reporting.

- Administer first aid.
- Call 911 if necessary.
- The individual can be escorted to the emergency department if the injury requires medical care but is not life threatening.

- Staff who are injured on the job and who require more than minor first aid but less than paramedic care, should go to the Corporate Health Program at Vista Medical Center and identify themselves as an employee of Independence Center. This program is only available to staff.
- Staff will follow-up by calling the emergency department or the injured person at home in order to determine if any further assistance can be offered by the Center.
- In all cases of personal injury, an incident report should be written within 24 hours.

#### **Incidents Involving Law Enforcement:**

- In cases involving violation of behavioral expectations/rules of Independence Center, the persons served/others involved may be asked to leave the Center for the remainder of that day.
- If the person served is unwilling to leave, the police department should be called immediately.
- If the police require charges to be brought in order to remove an individual, staff should press charges.
- Staff should consult with his/her supervisor to discuss the conditions upon which the offending person served can return to the Center. This may involve the development of a safety plan or a review of an existing safety plan.
- The local police should be called in all cases of destruction of Center property.
- An incident report should be written within 24 hours.
- Law enforcement will be contacted in all incidents alleging illegal activity including, but not limited to incidents involving assaults, including sexual assaults, battery and other crimes against persons or property.

#### **Incidents Involving residents of nursing homes, group homes and other structured living situations:**

- If the person involved in an incident is a resident of another agency, then that agency should be consulted before emergency services are contacted if this is possible. Of course, safety is the primary concern and there should be no delay made that would jeopardize the person served, or others.
- If the incident involves residents of Independence Center's Housing Program, then staff of the housing program should be notified and may need to escort the individual home and continue to monitor the situation. The Housing Coordinator should be made aware of the nature of the incident.

#### **Incidents Involving Vehicles:**

See policy on [Safety Away from Center – Community Activities](#). An incident report should be completed within 24 hours of any incident involving the Center's vehicles.

#### **Incidents Involving Suicide or Attempted Suicide:**

- In all cases of incidents that involve suicide or attempted suicide emergency services should be called using 911.
- Staff should stay on the scene until help has arrived.
- Once the person has been transported to the emergency room (or morgue), staff should secure the victim's area and make efforts to calm and console any persons served who may have witnessed the event.
- In the case of a completed suicide, the Executive Director and the OIG officer should be notified immediately. An incident report will be completed by staff and an OIG report made within 24 hours of the incident.

**Incidents Involving Theft or Destruction of Property:**

- Theft of Center property in an amount exceeding \$50 will be reported to the Waukegan Police Department.
- Theft or destruction of property in an amount exceeding \$500 will be reported the Center's insurance carrier at the Executive Director's discretion.
- A careful internal investigation of the theft will be conducted by Center staff.
- An Incident Report will be completed by staff in each of the above instances within 24 hours.

**Incidents of Abuse or Neglect or Death:** See [OIG Allegations of Abuse, Neglect and Deaths](#)

**Note:** See Policies on [Emergency Action Plan: Debriefings](#), [No Restraint or Seclusion Policy](#),

[Health and Safety Manual Appendix III.doc](#), [Corporate Compliance](#), [HIPAA Policies Appendix VIII.doc](#) and [EMERGENCY ACTION PLAN](#).



# OIG / ALLEGATIONS OF ABUSE/NEGLECT AND DEATHS

---

**Policy:** Independence shall report all allegations of abuse/ neglect and deaths to the Office of Inspector General in the Illinois Department of Human Services.

**Scope:** All Staff

Page 1 of 9

**Revised:** November 2016

---

## I. Purpose

To establish a uniform policy and procedures for reporting and responding to all abuse/neglect allegations and deaths.

## II. Authority

- Department of Human Services Act (*20 ILCS 1305/1-17*)
- Section 7.3 of the Mental Health and Developmental Disabilities Administrative Act (*20 ILCS 1705/*)
- Illinois Administrative Code, Chapter 1, Title 59, Part 50 (herein referred to as "Rule 50")
- Section 25 of the Health Care Worker Background Check Act (*225 ILCS 46/*)
- Nursing Home Care Act (*210 ILCS 45/*)
- Section 11-9.5 of the Illinois Criminal Code of 2012, Sexual misconduct with a person with a disability (*720 ILCS 5/*)
- Mental Health and Developmental Disabilities Code (*405 ILCS 5/*)
- Substance Abuse Confidentiality (*42 CFR 2/*)
- AIDS Confidentiality Act (*410 ILCS 305/*)
- MHDD Confidentiality Act (*740 ILCS 110/*)
- Freedom of Information Act (*5 ILCS 140/*)
- Health Insurance Portability and Accountability Act of 1996 (HIPAA), (*45 CFR, Parts 160, 162, and 164*)

## III. Policy

It is the policy and the responsibility of Independence Center to report all allegations of abuse/neglect and deaths to the Office of the Inspector General in the Illinois Department of Human Services within the required time frames in an appropriate and thorough manner. All employees (which includes owners/operators, contractors, subcontractors and volunteers) of Independence Center shall adhere to the standards set forth in this policy directive. Nothing in this policy directive precludes the agency's responsibilities as outlined in Illinois Administrative Code, Chapter 1, Title 59, Part 50, herein referred to as "Rule 50."

#### **IV. Objective**

To describe the procedures for reporting and responding to allegations of abuse, neglect, death, and other reportable incidents to the Office of the Inspector General (OIG).

#### **V. Responsibilities**

The Independence Center /Health and Safety officer shall ensure that all employees (which includes owners/operators, contractors, subcontractors and volunteers) are trained upon hire, and at least biennially thereafter, and are held responsible for carrying out the designated duties set forth in Rule 50 and this policy. The Rule 50 training should include, but not be limited to, the fact that identities of employees with substantiated physical abuse, sexual abuse, egregious neglect or financial exploitation shall be referred to the Department of Public Health's Health Care Worker Registry except when any appeal is pending or successful.

#### **VI. Definitions**

**Abuse:** See definitions for physical abuse, sexual abuse, mental abuse and financial exploitation.

**Access:** Admission to a community agency or facility for the purpose of conducting imminent risk assessments, conducting investigations, monitoring compliance with a written response, or completing any other statutorily assigned duty, such as annual unannounced site visits, including but not limited to conducting interviews and obtaining and reviewing any documents or records that OIG believes to be pertinent to an investigation.

**Act:** The Department of Human Services Act [20 ILCS 1305].

**Administrative action:** Measures taken by the community agency or the facility as a result of the findings or recommendations contained in the investigation that protect individuals from abuse, neglect, or financial exploitation, prevent recurrences, and eliminate problems.

**Aggravating circumstance:** A factor that is attendant to a finding and that tends to compound or increase the culpability of the accused.

**Allegation:** An assertion, complaint, suspicion or incident involving any of the following conduct by an employee, facility, or agency against an individual or individuals: mental abuse, physical abuse, sexual abuse, financial exploitation or neglect.

**Authorized Representative:** The administrative head or executive director of a community agency appointed by the community agency's governing body with overall responsibility for fiscal and programmatic management, or the facility director or hospital administrator of a Department facility. If this person is implicated in an investigation, the governing body of the community agency or the Secretary of the Department shall be deemed the authorized representative for that investigation.

**Bodily harm:** Any injury, damage, or impairment to an individual's physical condition, or making physical contact of an insulting or provoking nature with an individual.

**Community agency or agency:** A community agency or program licensed, funded, or certified by the Department but not licensed or certified by any other human services agency of the State, to provide mental health service or developmental disabilities service.

**Complainant:** The person who reports a death or an allegation of abuse, to include financial exploitation, or neglect, directly to OIG and is not the required reporter.

**Complaint:** A report of a death or an allegation of abuse, to include financial exploitation or neglect reported directly to the OIG Hotline.

**Credible evidence:** Any evidence that relates to the allegation or incident and that is considered believable and reliable.

**Day:** Working day, unless otherwise specified.

**Deflection:** A situation in which an individual is presented for admission to a facility or agency and the facility staff or agency staff do not admit that individual. Deflection includes triage, redirection and denial of admission.

**Department:** The Department of Human Services.

**Egregious neglect:** A finding of neglect as determined by the Inspector General that represents a gross failure to adequately provide for, or a callous indifference to, the health, safety, or medical needs of an individual and results in an individual's death or other serious deterioration of an individual's physical condition or mental condition.

**Employee:** Any person who provides services at the facility or the community agency on or off site. The service relationship can be with the individual or the agency. Also "employee" includes any employee or contractual agent of the Department of Human Services or the community agency involved in providing or monitoring or administering mental health or developmental disability services. This includes but is not limited to: owners, operators, payroll personnel, contractors, subcontractors, and volunteers. Employee also includes someone who is no longer working for an agency or facility, but is the subject of an ongoing investigation for which OIG has jurisdiction.

**Facility:** A mental health facility or developmental disabilities center operated by the Department.

**Final report:** A completed investigative report approved by the Inspector General that summarizes the evidence and that indicates whether the allegation of abuse, financial exploitation or neglect is substantiated, unsubstantiated, or unfounded based on the evidence gathered from the investigation, when the reconsideration and response period has expired.

**Financial exploitation:** Taking unjust advantage of an individual's assets, property, or financial resources through deception, intimidation, or conversion for the employee's, facility's, or agency's own advantage or benefit.

**Finding:** The Office of the Inspector General's determination regarding whether an allegation is substantiated, unsubstantiated, or unfounded.

**Health Care Worker Registry or Registry:** The Health Care Worker Registry created by the Nursing Home Care Act (210 ILCS 45/).

**Imminent Danger:** A preliminary determination of immediate, threatened or impending risk of illness, mental injury, or physical injury or deterioration to an individual's health that requires immediate action.

**Individual:** Any person receiving mental health services developmental disabilities services or both from a facility or agency, while either on-site or off-site.

**Insulting and provoking:** Conduct that offends a reasonable sense of personal dignity.

**Investigative report:** A written report that summarizes the evidence in an investigation, addresses the elements of the allegation, and contains a recommendation as to whether the findings of the investigation indicate that the allegation should be substantiated, unsubstantiated, or unfounded.

**Medical treatment:** Any treatment, other than diagnostic procedures, that may only be ordered or rendered to an individual by a physician or dentist regarding an injury.

**Mental abuse:** The use of demeaning, intimidating, or threatening words, signs, gestures, or other actions by an employee about an individual and in the presence of an individual or individuals that results in emotional distress or maladaptive behavior, or could have resulted in emotional distress or maladaptive behavior, for any individual present.

**Mitigating circumstance:** A condition that is attendant to a finding, and does not excuse or justify the conduct in question, but may be considered in evaluating the severity of the conduct, the culpability of the accused, or both the severity of the conduct and the culpability of the accused.

**Neglect:** An employee's, agencies, or facility's failure to provide adequate medical care, personal care, or maintenance, and that, as a consequence, causes an individual pain, injury, or emotional distress, results in either an individual's maladaptive behavior or the deterioration of an individual's physical condition or mental condition, or places an individual's health or safety at substantial risk of possible injury, harm or death.

**Non-accidental:** Occurring with volition, consciousness, not occurring by chance.

**OIG:** The Office of the Inspector General for the Illinois Department of Human Services.

**Physical abuse:** An employee's non-accidental and inappropriate contact with an individual that causes bodily harm. "Physical abuse" includes actions that cause bodily harm as a result of an employee directing an individual or person to physically abuse another individual.

**Preponderance of the evidence:** Proof sufficient to persuade the finder of fact that a fact sought to be proved is more likely true than not true.

**Recommendation:** An admonition, separate from a finding, that requires action by the facility, agency, or Department to correct a systemic issue, problem or deficiency identified during an investigation.

**Required reporter:** Any employee who suspects, witnesses, or is informed of an allegation of any one or more of the following: mental abuse, physical abuse, sexual abuse, financial exploitation or neglect.

**Routine programmatic:** Refers to services provided as part of the individual's habilitation plan, treatment plan, or as a regular or ongoing component of the community agency's or facility's general services or practices.

**Sexual abuse:** Any sexual contact or intimate physical contact between an employee and an individual, including an employee's coercion or encouragement of an individual to engage in sexual activity that results in sexual contact, intimate physical contact, sexual behavior or intimate physical behavior. Sexual abuse also includes:

- An employee's actions that result in the sending or showing of sexually explicit images to an individual(s) via computer, cellular telephone, electronic mail, portable electronic device, or other media with or without contact with the individual; OR
- An employee's posting of sexually explicit images of an individual online or elsewhere whether or not there is contact with the individual.

Sexual abuse does not include allowing individuals to, of their own volition, view movies or images of a sexual nature, or read text containing sexual content unless the individual's guardian prohibits the viewing of such movies or images or reading of such material.

**Sexual contact:** Inappropriate sexual contact between an employee and an individual involving either an employee's genital area, anus, buttocks or breast(s) or an individual's genital area, anus, buttocks or breast(s). Sexual contact also includes sexual contact between individuals that is coerced or encouraged by an employee.

**Sexually Explicit Images:** Includes, but is not limited to, any material which depicts nudity, sexual conduct, or sadomasochistic abuse, or which contains explicit and detailed verbal description or narrative accounts of sexual excitement, sexual conduct, or sadomasochistic abuse.

Sexually Explicit Images do not include those images contained in sex education materials used by employees to educate individuals.

**Substantiated:** There is a preponderance of the evidence to support the allegation.

**Unfounded:** There is no credible evidence to support the allegation.

**Unsubstantiated:** There is credible evidence, but less than a preponderance of evidence, to support the allegation.

## VII. Procedures

### A. Reporting

1. If an employee witnesses, is told of, or suspects an incident of physical abuse, sexual abuse, mental abuse, financial exploitation, neglect or a death has occurred, the employee or agency shall report the allegation to his or her supervisor/ member of management immediately. Upon the OIG Hotline (1-800-368-1463). The Health and safety officer/ his or her designee shall be informed of allegation and shall report the allegation immediately, but no later than the time frames specified herein. The OGI Hotline intake form <S:\OIG\OIG Hotline Intake Form 5B.pdf> shall be completed and emailed to Bureau Chief Office of the Inspector General [Mark.Kraus@Illinois.gov](mailto:Mark.Kraus@Illinois.gov) or faxed to his attention at (708) 338-7410. Mark can be reached by phone at (708) 338-7406
2. Nothing precludes the employee from reporting the allegation to the agency according to its procedures. If an employee witnesses, is told of, or suspects an incident of physical abuse, sexual abuse, mental abuse, financial exploitation, neglect or a death has occurred, the employee shall report the allegation to his or her supervisor/ member of management immediately. The supervisor/ Member of management will directly notify the Health and safety officer/ or designee of allegation and she/he shall report the allegation straightaway, but no later than the time frames specified herein.
3. The agency shall then ensure that allegations of abuse, neglect and deaths are reported to OIG no later than the time frames specified herein.

### B. Reporting to OIG

1. All allegations of abuse/neglect and death shall be reported to the OIG within the following required time frames:
  - a. Four-hour reporting - Within four hours after the initial discovery of an incident of alleged abuse or neglect, all allegations shall be reported to OIG's Hotline number: 1-800-368-1463. Four-hour reporting includes the following:
    - i.* Any allegation of abuse, including financial exploitation;
    - ii.* Any allegation of neglect; and
    - iii.* Any injury or death of an individual that occurs within the agency's programs when abuse or neglect is suspected.
  - b. At a minimum, the following details must be reported to the OIG Hotline concerning the allegation or death:
    - i.* Information about the victim, including name, date of birth, sex, disability, and identification number and/or social security number (if known);
    - ii.* Information about the incident, including what happened, when it happened, where it happened, how it happened and the identification of all witnesses;
    - iii.* Information about the accused (if known), including name, contact information and if the



- d. Report for Emergency Action Plan response when necessary:
  - i. When the Independence Center's Health and Safety officer determines that a medical Emergency Action Plan exists, immediately contact 911 for assistance;
  - ii. When the Independence Center's Health and Safety officer determines that law enforcement assistance is needed, immediately contact the appropriate local law enforcement authority, and notify OIG within one working day of the date and time the local law enforcement authority was notified and the name of the officer who took the report.
- 2. If there is an allegation or indication of a physical injury, sexual assault or any situation where a victim's health is in question, the agency shall immediately seek appropriate medical attention.
- 3. The Independence Center's Health and Safety officer shall ensure that OIG is notified of any changes in the alleged victim's condition, the nature of the injury or allegation, the involvement of any law enforcement authority, or the work status of the accused.
- 4. Pursuant to statute, agencies are prohibited from conducting their own complete abuse/neglect investigations. However, the agency shall initiate the preliminary steps of the investigation by a designated employee who has been trained in the OIG-approved methods, delineated under Rule 50.30(f), to gather evidence and documents and for whom there is no conflict of interest, unless otherwise directed by OIG or a law enforcement authority."
- 5. Response and examination of scene of incident: Unless otherwise directed by OIG, ensure appropriate responses to the allegation, which may include the need to secure the scene of the incident and preserve evidence, when applicable:
  - a. Securing the scene entails cordoning off and preventing access to and removal of objects from the area where the incident occurred. When there may be physical or visual evidence, the scene should be photographed from several angles, and nothing in the scene will be altered (e.g., floors washed, furniture moved, clothing laundered) until directed to do so by the appropriate investigating entity.
  - b. Immediately securing and preserving all relevant physical evidence.
    - i. After securing the scene and if either directed by law enforcement or OIG to secure evidence, then diagram the location of, clearly photograph, and collect all evidence placing it in a separate and appropriate container (e.g., paper bag or envelope). Under no circumstance should any item of evidence be placed in a plastic bag.
    - ii. In an allegation of sexual abuse, ensure that the victim has a complete medical examination before the victim showers or bathes, unless the victim objects.
    - iii. Identify and separate potential witnesses, when applicable.
    - iv. Copy and/or impound relevant documents as directed by the appropriate investigating entity.
    - v. All evidence collected shall be maintained in a secure and locked space with access only by

the person collecting the evidence, until transferred to the investigating entity. The chain of custody must be maintained and documented for all evidence collected.

## **6. Photographs**

- a. When injuries are alleged to be the result of abuse or neglect, the Independence Center's Health and Safety officer shall ensure that they are photographed immediately, even if the injury is not evident at the time.
  - i. Each photograph taken with 35mm film will be annotated by a label on the reverse with identifiers including the victim's name, date and time of the photograph, location of the injury, name of the person taking the photograph, and OIG case number, when known.
  - ii. Each photograph taken with a digital camera must be identified with the information above and submitted both as a hard copy and in electronic file format such as JPG or PNG.
  - iii. Take photographs both with and without an item of standard measurement, such as a ruler.
  - iv. Always include an identifying photo, one which shows both the alleged victim's face and injury site in the same photograph.
  - v. List all photographs taken on a photographic log.
- b. The privacy of the individual must be considered in all photographs. No photograph(s) will be taken of a female's breast or of any person's genital area unless necessary. If such are taken, only that portion of the area in question should be photographed and every effort should be made to insure that the photograph is taken by a person of the same gender as the alleged victim.

## **7. Initial written statements**

- a. When accused persons and potential witnesses are separated pursuant to (VI)(E)(5)(a)(2)((3)) above, Independence Center's Health and Safety officer may require written statements from each person, detailing what he or she knows about the alleged abuse/neglect or other incident. The statement must be written in a quiet and private location and be secured for delivery to OIG.
- b. The statement shall be obtained immediately upon the report of an allegation.
- c. The person providing the statement may also be required to draw a diagram of the location of the allegation, identifying all persons present.

## **8. Additional responsibilities**

- a. If, at any point, OIG determines, and informs the agency that there is credible evidence of a possible criminal act, the agency shall notify the appropriate law enforcement authority immediately, but no later than 24 hours after such discovery, and shall notify OIG of that notification and any report/complaint number(s) within one working day.
- b. Confidentiality of Information



- i.* Any allegation(s) or investigations of reports of abuse and neglect shall remain confidential until a final report is completed and approved by OIG.
- ii.* Information concerning diagnosis and treatment for alcohol or drug abuse shall be disclosed to OIG in accordance with federal regulations. OIG investigations are exempted from restrictions under the federal Health Information Portability and Accountability Act (HIPAA).
- iii.* Information concerning tests for human immunodeficiency virus (HIV) and diagnosis and treatment for acquired immune deficiency syndrome (AIDS) shall be disclosed to OIG only in accordance with the AIDS Confidentiality Act.
- iv.* All personal health-related information contained in investigative reports shall remain confidential in accordance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

## **F. Processing Investigative Reports**

1. The Independence Center's Health and Safety officer shall maintain a local investigative case file containing copies of all investigatory materials. This includes all evidence, such as photographs, written statements and records. The file shall also include documentation of all corrective actions taken as a result of the case.
2. Notifications, Final Report Findings: After receiving a final report if the alleged victim is an individual with a guardian, the Independence Center's Executive Director shall inform the individual and the guardian, in an appropriate manner, whether the allegation was substantiated, unsubstantiated or unfounded.
3. Confidentiality of Final Reports
  - a. Final reports of substantiated investigations shall be released only in accordance with Section 1-17 of the DHS Act, Section 6 of the Abused and Neglected Long Term Care Facility Residents Reporting Act, federal confidentiality statutes, the Illinois Mental Health and Developmental Disabilities Confidentiality Act, the Freedom of Information Act (OIG investigations are governed by this Act), and court orders.
  - b. Final reports of unsubstantiated or unfounded allegations shall remain confidential except that final reports shall be released pursuant to Section 6 of the Abused and Neglected Long Term Care Facility Residents Reporting Act (210 ILCS 30/6), Section 1-17(m) of the Department of Human Services Act (20 ILCS 1305), or a valid court order.
  - c. The identity of any person as the complainant shall remain confidential in accordance with the Freedom of Information Act or unless authorized by the complainant.

# **INDEPENDENCE CENTER INVESTIGATIVE PROTOCOL**

---

**Policy:** The goal of this policy is to provide a method for conducting objective thorough, timely investigations.

**Scope:** All Staff

Page 1 of 1

**Revised:** April 2015

---

All incident reports shall be investigated in an objective thorough, timely manner.

The Executive Director and/or the Assistant Director will determine if an investigation is required after reviewing incident reports. (The personnel committee will handle wrongdoing allegations levied against the Executive Director or Assistant Director).

Incidents that involve death, destruction of property, theft, bodily harm, and vehicular accidents shall be reported to the local police authority for formal investigation. All staff will cooperate with police investigations.

Incidents that involve death, physical abuse, sexual abuse, mental abuse, financial exploitation, neglect, allegations of abuse or neglect, persons being injured physically and or mentally shall be reported to the Office of Inspector General following their time frames.

Incidents that involve allegations of misconduct and violations of the code of ethics shall be reported to person's supervisor (unless the allegation is against the supervisor, then the allegations should be reported their supervisor).

The following incidents will warrant an investigation:

- Allegations of misconduct
- Allegations of abuse and neglect
- Allegations of a violation of the code of ethics
- Property damage
- Accidents where a person is injured

The Independence Center appointed investigator would initiate the investigation (unless the allegation is directed against them. In this event another staff person shall be appointed to investigate). The investigator will create an investigation file using the O.I.G. Rule 50 protocols for investigations.

**THE INVESTIGATOR WILL DO A PRELIMINARY REPORT WITHIN 30 DAYS OF THE ASSIGNMENT UNLESS THERE ARE EXTENUATING CIRCUMSTANCES SUCH AS WITNESSES BEING UNAVAILABLE). THE INDEPENDENCE CENTER INVESTIGATIVE FILE SHOULD INCLUDE PHYSICAL AND DOCUMENTARY EVIDENCE SUCH AS PICTURES, INTERVIEW STATEMENTS AND RECORDS. THE FILE SHOULD INCLUDE A SUMMARY OF THE INVESTIGATION AND A RECOMMENDATION AS TO WHETHER THE ALLEGATION SHOULD BE SUBSTANTIATED, UNSUBSTANTIATED, OR UNFOUNDED. THIS FILE SHOULD BE SUBMITTED TO THE EXECUTIVE DIRECTOR AND THE ASSISTANT DIRECTOR FOR A DECISION ON ACTIONS TO BE TAKEN FOLLOWING THE CENTER'S POLICIES FOR DISCIPLINARY ACTION.**

# **BUILDING AND SAFETY INSPECTIONS**

---

**Policy:** Independence Center will complete building and safety inspections to ensure safety standards are being maintained.

**Scope:** All Staff **Page 1 of 1**

**Sites:** All

**Revised:** March 2018

---

The Health and Safety Officer or designee will conduct self-inspections semi-annually on all Independence Center properties. This inspection will result in a written report that will be kept on file. The report will identify: The areas inspected, recommendations for areas needing improvement and actions taken to respond to the recommendations. Corrections will be made as indicated. Health and Safety Officer will be informed of corrections needed and will contact external service providers if necessary in order to remedy any problems.

All hazards and violations will be reported to a Health and Safety Committee and necessary steps will be taken to remedy the problems and a Plan of Correction will be completed. A report will also be given to the management team to be reviewed at their monthly meeting and to program/department managers. Those managers will make corrective action and a Plan of Correction will be completed and submitted to the Health and Safety Committee. Prior plans will be reviewed at semi-annual inspections.

# Medical



# FIRST AID PLAN

---

A. **CHECK** the scene:

Is it safe for you and bystanders?

Gather this information.

Is the scene safe?

What happened?

How many victims are there?

Can bystanders help?

**Call 911 if the victim:**

- Is or becomes unconscious
- Has trouble breathing or is breathing in a strange way
- Is choking and has a blocked airway
- Has chest discomfort pain or pressure that persists for more than 3-5 minutes, or that goes away and comes back
- Is bleeding severely
- Has pressure or pain in the abdomen that does not go away
- Is vomiting or passing blood
- Has a seizure that lasts more than five minutes or multiple seizures
- Has a seizure and is pregnant
- Has a seizure and is diabetic
- Has a severe headache or slurred speech
- Sudden confusion or altered mental status
- Appears to have been poisoned
- Has injuries to the head, neck or back
- Has possible broken bones

B. **CALL 911:**

- Give the dispatcher the necessary information.
- Answer any questions they may have
  - i. The exact location and address of the Emergency Action Plan
  - ii. Your name
  - iii. What happened
  - iv. How many people are involved
  - v. Condition of victims
  - vi. What help is being given
- Do not hang up until the dispatcher hangs up
- Return and continue care for the victim

Calling for help is often the most important action you can take.

When to call for EMS:

If a victim is unconscious, have someone else call 911 immediately, while you provide care.

C. **CARE** for the victim:

- Get permission to give care
- Do not give care to a conscious victim who refuses it
- Permission is implied if victim is unconscious or unable to respond
- Always care for life-threatening emergencies before those that are not life-threatening

- Watch for changes in victims breathing and consciousness
- Help victim rest comfortably
- Keep them from getting chilled or overheated
- Reassure victim
- Do not transport a victim with a life-threatening condition or one that can become life-threatening

**For further instructions and information, the American Red Cross First Aid Book is located in each First Aid Kit.**

# **FIRST AID, CPR AND AED TRAINING**

---

**Policy:** To ensure that all persons at the center are safe the Center will train its personnel in first aid, CPR and AED.

**Scope:** All Staff

**Page 1 of 1**

**Revised:** December 2022

---

During all hours of operation there will be at least one staff person trained in basic first aid, CPR and AED operation. All staff members will be trained in basic first aid, CPR and AED and certifications renewed as required by the American Red Cross. All new/incoming staff members will be trained in basic first aid, CPR and AED within one year of initial date of hire.

First aid kits are located at each Independence Center site. First aid instructions are located in kit. Staff should immediately call 911 for emergency medical assistance in an instance, which requires more than first aid. Signs will be posted in the Center stating this.

**IMMEDIATELY CALL**

**911**

**FOR EMERGENCY MEDICAL ASSISTANCE  
WHEN IT REQUIRES MORE THAN FIRST AID**

# ADVANCE DIRECTIVES AND DO NOT RESUSCITATE ORDERS

---

**Policy:** To describe Independence Center’s policy and procedure for following advance directives and Do Not Resuscitate (DNR Do Not Resuscitate) orders.

**Scope:** All Staff

Page 1 of 3

**Site:** All Sites

**Revised:** December 2022

---

## Definitions

Advance Directives: a written statement of a person's wishes regarding medical treatment, often including a living will, made to ensure those wishes are carried out should the person be unable to communicate them to a doctor

DNR (Do Not Resuscitate): a medical order to refrain from cardiopulmonary resuscitation if the member’s heart stops beating.

Resuscitation: a medical procedure which seeks to restore cardiac and/or respiratory function to individuals who have sustained a cardiac and/or respiratory arrest. "Do Not Resuscitate" ("DNR") is a medical order to provide no resuscitation to individuals for whom resuscitation is not warranted.

Cardiopulmonary resuscitation ("CPR"): is the common term used to refer to resuscitation. However, the options available to treat very sick members are broader than CPR as literally defined. Other options include intensive care, antibiotic therapy, hydration, and nutritional support. Appropriate comfort care measures should be employed for all members, especially terminally ill members.

## Procedure

Upon admission, the admitting clinician will provide information regarding a person’s served right to make decisions concerning health care, which include the right to accept or refuse medical treatment, the right to execute advance directives, and applicable agency policies. The clinician will document in the clinical record that the information was provided.

If the person served lacks decision making capacity, the admitting clinician will provide information and direct inquiry about advance directives to the person’s served representative. The clinician will document that the person’s served representative received information and his/her name and responses will be noted in the clinical record.

If conditions are such that it is not practical to provide information to the person served or his/her representative at the time of admission, such information will be provided as soon as feasible after admission.

During the admission/intake visit, the admitting clinician will ask the person served or his/her representative whether or not he/she has completed an advance directive, Durable Power of Attorney for health care(DPOAHC), a living will, the mental health treatment declaration (MHTD),and/ or DNR order. If an advance directive has been completed, the clinician will ask for a copy of the advance directive so it will be placed in the clinical record. If a copy is not immediately available, the person served will be informed that it is his/her responsibility to provide a copy of the advance directive to the agency as soon as possible.

When applicable, the admitting clinician will document on the clinical record and notify the clinical team verbally of the advance directive if the person served has executed one.

All clinicians providing care for the person served will:



- Review the advance directive and report any discrepancies between the directive and current treatment plan to Assistant Director, and the person served.
- Utilize available educational materials to answer the member's questions about advance directives, durable power of attorney or living wills.
- Encourage the person served to discuss questions and concerns with appropriate individuals such as the physician, family/caregiver, and his/her selected advocate.
- Assist the person served who wants to develop an Advance Directive by obtaining a form and providing access to the outside individuals as necessary to execute the directive.
- Educational information about advance directives and Independence Center's policies and procedures regarding advance directives will be provided to Independence Center personnel, as well as volunteers during the orientation period.

If a person served with a DNR order presents with a life-threatening emergency during Independence Center business hours, Independence Center's First Aid Plan will be followed, the person served will be checked, EMS will be summoned by calling 911 (consistent with requirement to try to transfer the person served to a facility which may follow the DNR protocol), and **CPR/AED procedures will be initiated**. The site Executive Director, Assistant Director, and emergency contact/guardian will be notified. When EMS personnel arrive, the DNR order will be provided to them, and they will follow their protocols.

#### **Person Served Consent to a DNR Order**

DNR is a medical order to be given only by authorized health care practitioners. DNR orders generally should be given with the informed consent of the person served or the person's served surrogate decision-maker. Ideally, the physician should sensitively discuss the DNR option with the person served while the person served is mentally competent. However, DNR orders are often considered for persons served who are comatose or who otherwise lack decisional capacity with whom this discussion has not occurred or cannot occur. In cases when a person served lacks decisional capacity, the DNR option should be considered in conjunction with the person's advance directives, if known, or should be discussed with a surrogate.

#### **Recording the DNR Order in the Medical Chart**

The words "Do Not Resuscitate" or the acronym "DNR" will be documented in the reminder note section of the electronic medical record.

**DNR decisions for members should be transmitted clearly to those caring for the persons served. A DNR order should never result in the abandonment of a person served, and steps should be taken to assure that abandonment is not perceived.**

#### **Reassessment and Revocation of DNR Orders**

The DNR order should be reassessed as part of the ongoing evaluation of a person served. A DNR order should be affirmed, modified, or revoked only after a discussion between the primary physician and the person served, if possible, or the surrogate(s) if appropriate, and the consent of the person served or surrogate. DNR orders should be reassessed frequently and as conditions warrant. Reassessments of DNR orders should be documented in the medical chart. If a DNR order is revoked, the person's served chart should have the "DNR" indicator and paperwork removed.

# COMMUNICABLE DISEASES

---

**Policy:** Independence Center recognizes the serious implications of communicable diseases and will protect the welfare of its staff and members.

**Scope:** All Staff and Members

Page 1 of 1

**Revised:** December 2022

---

Communicable diseases, those understood to have serious, deleterious effects on human health and which are transmitted and spread through casual and physical human contact, can pose a considerable threat to the community. Examples of communicable diseases include, but are not limited to:

Enterovirus D68	West Nile Virus
Hantavirus	Rabies
Viral Hepatitis	CRE
Pneumonia	Ebola
Measles	Avian Flu
Meningitis	Non-Typhoidal Salmonella
MPX (formerly Monkeypox)	SARS
Mumps	Tuberculosis
Rubella	Conjunctivitis
2019-nCov	Whooping Cough/Pertussis
Zika	Influenza
Shigellosis	MRSA

# NOROVIRUSES/FOOD SANITATION

---

**Policy:** Independence Center will take steps necessary to prevent the spread of noroviruses and other food-transmittable diseases.

**Scope:** All Staff and Persons Served

Page 1 of 1

**Revised:** December 2022

---

To prevent the spread of this illness in the clubhouse, all persons in the clubhouse who handle food will take the following steps:

Be very aware of the health of all food service workers. Any food service worker who is experiencing vomiting, diarrhea or fever will be excluded from working with food or in these areas until these symptoms have passed for 72 hours.

The Independence Center will stress and reinforce the importance of hand washing on a routine basis, eliminate bare hand contact with ready-to-eat foods and instruct all people to use single use gloves. All fresh fruits and vegetables will be thoroughly washed in warm water, especially those that will not be cooked.

## **Why is an Employee Health Policy Required?**

Ill food workers are a leading cause of foodborne illness outbreaks. An effective employee illness policy reduces the risk of food contamination by ill food workers.

## **Responsibility of Food Handlers:**

1. Report the following symptoms to the Psychosocial Rehabilitation Coordinator/Designee in charge:

- Vomiting\*
- Diarrhea\*
- Jaundice
- Sore throat with fever
- Infected cuts or burns on hands and wrists

2. Report the following diagnosed illnesses to the Psychosocial Rehabilitation Coordinator/Designee in charge:

- Salmonella Typhi (typhoid-like fever)
- Nontyphoidal Salmonella
- Shigella spp. (causes shigellosis)
- E-coli O157:H7
- Hepatitis A virus
- Norovirus

## **Responsibility of the Psychosocial Rehabilitation Coordinator/Designee in charge:**

1. Exclude all ill persons from the food service kitchen while they have:

- Diarrhea
- Vomiting

\*NOTE: Employees may not return to work until they have been asymptomatic for at least 72 hours.

2. Appropriately exclude or restrict persons diagnosed with:

- E. coli O157:H7
- Salmonella
- Shigella
- Hepatitis A

# NARCAN (NALOXONE) POLICY

---

**Policy:** It is Independence Center’s policy to provide guidelines regarding utilization of Nasal Narcan administered by staff of the Independence Center for emergency opioid overdoses.

**Scope:** All Staff

**Revised:** October 2022

Page 1 of 2

---

**Policy:** It is Independence Center’s policy to provide guidelines regarding utilization of Nasal Narcan administered by staff of the Independence Center for emergency opioid overdoses. Narcan (Naloxone) is an opioid receptor antagonist & antidote for opioid overdose. Opioids include, but are not limited to: Heroin, Fentanyl, Morphine, Codeine Hydrocodone, Hydromorphone, Methadone, Oxycodone and Carfentanil.

## Procedure:

1. Staff along with any interested members and guests at Independence Center will be provided training on the proper administration and storage of Nasal Narcan. Staff training will take place during initial orientation and as needed. Staff Guests and Members at Independence Center will be provided with training during health and safety presentations at semi-annual planning days. Instructional videos on administration of Narcan are also available at any time at the Illinois Department of Public Health website. Nasal Narcan will be available to all staff at Independence Center and any interested guests and members who use Independence Center Services. Narcan will be kept in the Certified Recovery Support Specialist Office and Housing Office at the 1730 Washington location, the Housing Office at the 320 N. Ash St. location and in the staff mailroom at the 2025 Washington location. Additionally, staff, along with guests and members can obtain Nasal Narcan from the Housing Coordinator to keep in their own possession, provided they have been trained on proper administration and storage. Nasal Narcan can be damaged by extreme temperatures (high & low) so guests, members and staff will be cautioned to avoid storing Narcan in these environments (e.g. outdoors, in vehicles, etc.)
2. The Housing Coordinator as the chair of the Health and Safety Committee will be responsible for the acquisition of Narcan from organizations such as the Lake County Health Department and NICASA along with from other organizations and pharmacies. The Housing Coordinator will ensure Narcan stored in the Certified Recovery Support Specialist Office and the Housing Office at the 1730 Washington location, the Housing Office at the 320 N. Ash St. location and in the staff mailroom at the 2025 Washington location has not expired by checking Narcan supplies at semiannual intervals when property inspections of those locations are conducted. Any Narcan that will expire within six months of these checks will be disposed of and replaced. Any Narcan supplies that appear to have been used, damaged or stored improperly will also be disposed of and replaced during these semiannual checks. Any staff, members or guests who choose to obtain their own Narcan supplies will be encouraged to follow these protocols. Studies have shown that Narcan Nasal Spray is effective up to one additional year past expiration & there are no adverse side effects if used.
3. Guidelines for Administration: Signs of an opioid overdose include: respiratory failure, slow breathing, small pupils, unresponsiveness, or blue skin from poor circulation, shallow breathing, confusion, lessened alertness, and loss of consciousness. Staff will follow Independence Center’s policies and procedures regarding First Aid/CPR/AED along with Universal/Standard precautions during Narcan administration as with any other suspected medical emergencies.
4. To Administer Narcan:

- Pull back the paper tab & hold the Narcan Nasal spray with your thumb on the bottom of the plunger & first & middle fingers on either side of the nozzle tilt persons head back supporting their neck with your hand & insert tip of the nozzle into one nostril then depress the red plunger firmly
- Move person on their side (recovery position)
- Call 911 (dial 9-911)
- Watch the person closely. Monitor their breathing & pulse. If they don't respond by waking up/to voice or touch or breathe normally- if available give another dose of Narcan in the other nostril. You may repeat every 3" until 911 responds
- Provide report to 911 when they arrive. Consider the used Nasal Narcan Spray biohazardous material & give to 911 for proper disposal. Note: Narcan only lasts for a limited amount of time as Narcan wears off further effects of opiate overdose may occur. Encourage that person to be transported to hospital for care
- Document Nasal Narcan use in incident tracker software and include: description of condition; behavior; quantity of Narcan Nasal Spray administered; response to Narcan Nasal Spray; 911 contacted & their response/transportation; any refusal of medical treatment; Contact the Housing Coordinator to get a replacement for used items.
- Note: See Policies regarding: Biohazardous Incidents; First Aid Plan, First Aid/CPR/AED Training, Infection Control; Universal/Standard Precautions, Unusual/Critical Incidents

3. Notify the local health department of any employee diagnosed with any of the illnesses listed above.

# Environmental



# HOUSEKEEPING

---

**Policy:** All Independence Center facilities shall maintain a clean and safe working environment.

**Scope:** All Staff

Page 1 of 3

**Site:** Main Site and 1730 Washington Street Office Area

**Revised:** July 30, 2012

---

Many painful and sometimes disabling injuries are caused when employees are struck by falling objects or by striking against or tripping over objects they did not see. Many injuries and property damage losses stem from fires caused by poor housekeeping practices and improper storage of flammable materials. The best protection against these hazards is good housekeeping.

When materials are stored properly with adequate space to move through the storage area, or with adequate clearance to work within the storage area, accidents can be avoided. With some pre-planning, tripping hazards can be avoided and many other sprains, fractures, and bruises that result from falls can be prevented.

Aside from the accident prevention benefits, good housekeeping means efficient performance. When materials, tools, and equipment all have a place for orderly storage, and are returned to the proper place after use, they are easier to find and easier to inspect for damage and wear.

Comprehensive health and safety inspections are conducted annually by qualified external authorities such as (e.g. fire department, health department, safety engineer, City of Waukegan, safety consultant, health specialist, insurance carrier). Comprehensive health and safety self-inspections are conducted semi-annually by the Health and Safety Officer.

## **The following housekeeping safety procedures apply:**

- Keep work areas and storage facilities clean, neat and orderly.
- Keep all aisles, stairways, passageways, exits and access ways to buildings free from obstructions at all times. Remove all grease and water spills from traffic areas immediately.
- It is everyone's responsibility to pick up and clean up.
- Do not place supplies on top of lockers, hampers, boxes, or other moveable containers at a height where they are not visible from the floor.
- When piling materials for storage, make sure the base is firm and level. Cross tie each layer. Keep piles level and do not stack piles too high. Keep aisles clear and maintain adequate space to work in them.
- When storing materials suspended from racks or hooks, secure them from falling and route walkways a safe distance from the surface beneath.
- When storing materials overhead on balconies or mezzanines, provide adequate toe boards to keep objects from rolling over the edge.
- Do not let materials and supplies that are no longer needed accumulate. IF IT IS NOT NEEDED, GET RID OF IT!

- Tools, equipment, machinery and work areas are to be maintained in a clean and safe manner. Defects and unsafe conditions must be reported to your supervisor.
- Return tools and equipment to their proper place when not in use.
- Lay out extension cords, air hoses, water hoses, ladders, pipes, tools, etc., in such a way as to minimize tripping hazards or obstructions to traffic.
- Clean up spills immediately to avoid hazards. In the event the removal cannot be done immediately, the area must be appropriately guarded, signed or roped off.
- Nail points, ends of loop or tie wires, etc., must not be left exposed when packing and unpacking boxes, crates, barrels, etc. Nails are to be removed as soon as lumber is disassembled.
- Store sharp or pointed articles to keep co-workers from coming in contact with the sharp edges or points.
- Dispose of all packing materials properly to reduce the chance of fires.
- Empty wastebaskets daily into approved containers.
- Put oily and greasy rags in a metal container for that purpose and dispose of properly and frequently.
- Maintain adequate lighting in obscure areas for the protection of both employees and the public. Keep landscaping well-manicured to minimize hiding places.
- Employees are not to handle food, tobacco, etc., with residue from any lead-based product (such as leaded gasoline) on their hands. Consumption of food and beverages is prohibited in areas where hazardous substances are stored or used.
- Employees whose hands are cut or scratched are not to handle any lead-based products.
- All switches or drives on machinery must be shut down and locked out before cleaning, greasing, oiling, or making adjustments or repairs.
- Circuit breaker boxes should be kept closed at all times. It is a requirement to maintain a minimum clearance of 36 inches in front of them.
- Flammables (kerosene, gasoline) and combustible materials (coats, rags, cleaning supplies) should not be stored in janitorial rooms or around electrical boxes.
- Extension cords should not be run across aisles or through oil or water. Inspect cords for kinks, worn insulation, and exposed strands of wire before use.
- When fuses blow continually it is an indication of an overload or short. Report this condition to your facilities manager immediately.
- Keep electrical equipment properly maintained and free of grease and dirt.
- To prevent static sparks, keep drive belts dressed. Also check belts for proper tension to prevent overloading motors.



- Maintain fire inspections and other fire prevention measures.
- Observe all safety warning signs, including locks and tags on equipment such as; No Smoking, Confined Space, etc.

# **BED BUG ABATEMENT**

---

**Policy:** Independence Center will take steps necessary to prevent bed bug infestations in all Center owned properties.

**Scope:** All Staff and Members

**Page 1 of 1**

**Revised** December 2022

---

To avoid the potential infestation of Center property Independence Center does not allow:

1. Donations of any used goods that could possibly be infested with bed bugs with the exception of items that have been inspected and documented “pest free” by a certified pest control specialist. Inspection of said items would be at the expense of the donor.
2. Storing of property from external sources

# INFECTION CONTROL

---

**Policy:** Independence Center is dedicated to the prevention of the spread of infectious conditions/diseases.

**Scope:** All persons served and staff of 1 Page 1

**Revised:** December 2022

---

- All persons in the Independence Center shall take all necessary precautions when dealing with potentially infectious diseases, and shall include the use of wearing rubber gloves. All bodily fluids shall be treated as if they are infectious. Any unknown substance shall be treated as potentially infectious. The following steps will be taken to ensure that universal precaution/standard precaution/infection control procedures are implemented at the Center:
- Universal precautions kits will be located at all Center office sites and center vehicles.
- There will be safety kits for staff persons who use personal vehicles to transport persons served. Safety kits will include first aid kits, fire extinguishers, Emergency Action Plan manuals, first aid manuals and universal precaution kits. All staff must carry this safety kit when transporting persons served.
- The PSR program personnel will be certified in food sanitation and will train all persons who work in the kitchen of the Center in safe food handling procedures (including hand washing, proper storage, and temperature zones for food).
- All persons of the Independence Center shall immediately follow the [Infection Control, Universal/Standard Precautions](#) policies.
- An incident report shall be completed after any incident in which first aid rendered. See [Unusual Critical Incidents](#).
- All persons shall receive training in proper infection control and universal precautions during orientation and on an annual basis in-service training. Persons served will be trained in orientation and at planning day.
- This information is disseminated in the Independence Center Handbook and Policy and Procedures Manual.

# UNIVERSAL/STANDARD PRECAUTIONS

---

**Policy:** Independence Center is dedicated to the prevention of the spread of infectious conditions/diseases. If blood or bodily fluids are evident in a given area, the staff shall implement the universal/standard precaution/infection control procedures detailed in this Emergency Action Plan.

**Scope:** All Staff

Page 1 of 4

**Revised:** December 2022

---

All persons must consider the blood and bodily fluids from all persons as potentially infectious and take precautions to prevent transmission of disease to themselves and all other persons.

All persons are responsible for complying with procedures for universal/standard precautions as well as specific isolation procedures and for tactfully calling observed infractions to the attention of offenders. Persons served and visitors all have the responsibility for complying with these precautions.

## **Precautions:**

### ***Wash hands***

- After use of restroom
- Before handling food and eating
- After contact with hair, eyes, mucous membranes and wounds
- Before and after giving first aid
- After touching organic material
- After handling contaminated equipment
- Before handling dressings or touching open wounds (latex gloves should be worn)
- Before and after performing invasive procedures (latex gloves should be worn)

### ***Method for effective hand washing***

- Keep hands and clothing away from sink surface
- Turn on water, regulating flow and temperature
- Avoid splashing water on clothing
- Wet hands and lower arms under running water. Keep hands and forearms below elbows during washing (hands are the most contaminated parts to be washed. Water flows from least to most contaminated areas).
- Apply soap
- Wash hands using plenty of lather and friction for 15-30 seconds. Friction and rubbing mechanically loosen and remove dirt and transient bacteria
- Interlace fingers and rub palms and backs of hands with circular motion to ensure that all surfaces are cleansed
- If areas under fingernails are soiled, clean with fingernails of other hand, or an orangewood stick
- Do not tear or cut skin under or around nails

- Rinse hands and wrists thoroughly, keeping hands down and elbows up. (rinsing washes away dirt and microorganisms.)
- Dry hands thoroughly, wiping from fingers down to wrists and forearms
- Discard paper towel in proper receptacle
- Turn off faucet with a clean, dry paper towel (wet towels and wet hands allow transfer of pathogens by capillary action)

### ***Personal Protective Equipment***

Personal protective equipment is to be worn by all persons when having contact with blood or bodily fluid from all persons. Personal protective equipment will be considered appropriate, only if it does not permit blood or other potentially infectious materials to pass through or reach the person's clothes, skin, eyes, mouth or other mucous membranes under normal conditions of use. And for the duration of time which the protective equipment will be used.

- Personal protective equipment shall be available at each Independence Center site.
- All personal protective equipment shall be removed prior to leaving the work area. When personal protective equipment is removed, it shall be placed in an appropriately designated container for storage, washing, decontamination or disposal.

### ***Gloves***

In general, there are three reasons for wearing gloves; provide protection against infectious microorganisms; reduce the likelihood that persons will transmit their own indigenous microbial flora to others; reduce the possibility that persons will become transiently colonized with microorganisms that can be transmitted to other persons.

- Gloves shall be worn for touching blood and body fluids, mucous membranes, or non-intact skin of all persons. They must also be worn when handling items or surfaces soiled with blood or body fluids. While gloves reduce the incidence of contamination of hands, they cannot prevent injuries caused by sharp instruments.
- Disposable gloves such as surgical or examination gloves shall be replaced as soon as practicable, when contaminated or as soon as feasible, if they are torn, punctured, or when their ability to function as a barrier is compromised.
- **DO NOT** wash or disinfect sterile or examination gloves for reuse. Washing may cause "wicking", i.e. the enhanced penetration of liquids through undetected holes in the gloves. Disinfecting agents may cause deterioration.
- Use general-purpose utility gloves (rubber household gloves) for housekeeping chores and for instrument cleaning or decontamination procedures. Utility gloves may be decontaminated and reused but should be discarded if they are peeling, cracking or discolored, or if there are punctures, tears, or other evidence of deterioration.
- Gloves must be changed after contact with each person. Used gloves shall be discarded into an appropriate trash receptacle. Gloves shall be changed after contact with a person's excretions and secretions, and clean gloves reapplied if person care has not been completed. Environmental surfaces are not to be touched with contaminated gloves.
- Gloves shall be worn when cleaning or disinfecting environmental surfaces contaminated blood or body fluids.

### ***Protective Clothing***

Gowns and similar protective clothing are indicated if clothes are likely to be soiled by blood or body fluids of any person. Appropriate protective clothing shall be worn in occupational exposure situations. If garments are penetrated by blood or other potentially infectious materials, the garment shall be removed immediately or as soon as feasible. Gowns shall only be worn once then be discarded into an appropriated container.

### ***Masks and protective eyewear***

- Masks in combination with eye protection devices, such as goggles or glasses with solid side shields, or chin-length face shields, shall be worn whenever splashes, spray, splatter, or droplets of blood or other potentially infectious materials may be generated and eye, nose, or mouth contamination can be reasonably anticipated.
- Masks are recommended to prevent transmission of infectious agents through airborne routes. Mask protective wear from inhaling large particle aerosol (droplets) that are transmitted by close contact and small particle aerosols (droplet nuclei) that remain suspended in the air and travel longer distances.
- When masks are indicated, they shall cover both the nose and mouth. Masks become ineffective when moist; therefore, they shall be used only once and then discarded into appropriate receptacle. Masks shall not be lowered around the neck and reused. When it is necessary to wear masks for extended periods of time, they must be changed at least every hour, or more frequently if they become moist. When removing the mask, only the ties or elastic bands should be touched, because the filtering area may be highly contaminated.
- Non-disposable protective eyewear contaminated with blood or bodily fluids shall be washed with germicidal disinfectant. Disposable protective eyewear shall be discarded into an appropriate receptacle.

### ***Surgical Caps and Shoe Covers***

- Surgical caps and shoe covers or fluid resistant shoe covers or boots shall be worn in instances when gross contamination can be anticipated.

Eating, drinking, smoking applying cosmetics or lip balm and handling contact lenses are prohibited in work areas where there is a reasonable likelihood of occupational exposure.

In the event that you are dealing with infectious contagion the following steps should occur:

- Locate a universal precaution kit
- Put on necessary gear as described above
- Contain any biohazard possible. This may be done by performing first aid, evacuating the site, and or quarantining the fixture
- Begin decontamination procedures

### ***Decontamination Procedures***

In the event of a potential biohazard contaminations follow these quarantine and decontamination procedures:

### ***Contaminated Garments***

Place all contaminated garments in a biohazard bag (bags are located inside universal precaution kits and in the foodservice storage area). If item is personal (e.g. pants, shirt, jacket) item should still be placed in a biohazard bag. Disposal items should be placed directly in the trash receptor, located outside, to avoid unnecessary exposure by other persons handling garbage. Personal items should be taken directly to car and should be laundered before using again.

### ***Contaminated furniture or fixtures***

If an item contaminated is a piece of furniture (e.g. chair, table, computer) or a permanent fixture (e.g. wall, floor) the item should be wiped off using SaniZide Plus a hard surface disinfectant/deodorizer. **For use on:** glass, porcelain, ceramic, metal, polyethylene, polypropylene, vinyl, polyester, rubber, Bakelite, and many more hard surfaces. Should item be contaminated with spilled blood, urine, vomit, or other potentially hazardous wastes, sprinkle red Z encapsulators (from universal precaution kit) on the fluid and it will be encapsulated in seconds. Just scoop-up the granulated gel and dispose in accordance with center policy. All items used must be disposed of by placing in biohazard bags. Items such as mops and brooms must be thrown directly in garbage receptacle outside. If the fixture is a carpet area, cloth chair, or a very large area that cannot be easily cleaned by staff the staff person should quarantine the item / area. To quarantine the item the staff person should take the item to the boiler room, wrap orange caution tape around item and place sign saying biohazard. To quarantine an area orange caution tape should be used (located in the emergency command center) to mark area. Signs should state clearly biohazard. The incident commander should be notified of the need for quarantine item/ area. The incident commander will arrange for the fixture to be cleaned by the appropriate company.

# **SAFETY DATA SHEETS**

---

**Policy:** Independence Center will have Safety Data Sheets (SDS) compiled in a common folder for all chemical products used within the Independence Center.

**Scope:** All Staff

**Page 1 of 1**

**Revised:** December 2022

---

All chemical products brought into the Independence Center shall be clearly marked of their contents. All chemical products will be brought to the lower level PSR department for the purpose of obtaining safety data sheets on such products, this information will be kept in a folder located in the PSR department. Alternatively, Safety Data Sheets can be obtained online at manufacturer's websites.



# **CONTROL OF CHEMICAL MATERIALS**

---

**Policy:** Independence Center will dispose of biochemical material in an appropriate and safe manner.

**Scope:** All Staff

**Site:** All Sites

**Page 1 of 1**

**Revised:** March 2016

---

The Independence Center will dispose of biochemical material in an appropriate and safe manner. Chemicals which are hazardous to the environment, will be handled in accordance with the guidelines set forth by the City of Waukegan. In most cases, this involves taking the substance or item to the city facility.

Biochemical waste (i.e. needles) will be stored in clearly marked biohazard containers located in the upper level room 1B. These containers will be taken to the Lake County Health Department for disposal when they are full.

In no instance will dangerous materials be placed in the dumpster.

# STORAGE AND DISPOSAL OF HAZARDOUS MATERIALS

---

**Policy:** It is the policy of Independence Center to comply with all applicable OSHA and EPA regulations in the handling, storage and disposal of hazardous materials.

**Scope:** All Staff, Persons Served, Visitors

Page 1 of 2

**Sites:** All Sites

**Revised:** December 2022

---

Personnel, persons served and visitors of Independence Center may come in contact with hazardous materials. A hazardous material can be defined as a material whose handling, use and storage are guided by or defined by local, state or federal regulation. Examples of hazardous materials may include:

- **Flammable/Combustible:** Can be easily set on fire.
- **Explosive/reactive:** Can detonate or explode through exposure to heat, sudden shock, pressure or incompatible substances.
- **Corrosive:** Chemical action can burn and destroy living tissues or other materials when brought into contact.
- **Toxic:** Capable of causing injury or death through ingestion, inhalation or skin absorption. Some toxic substances can cause cancer, genetic mutations and fetal harm.

## Procedures

### Purchase and Use

- **Labels:** OSHA Standard 29 CFR 1910.1200 requires labeling of all chemical containers by the manufacturer. These labels are present to inform those who use the product as to the specific health and safety hazards the product may present as well as provide information on the appropriate method of disposal. Employees and members of Independence Center will not remove the manufacturer's labels and/or transfer labeled products from the labeled container to another unlabeled container. Containers will not be reused or used for multiple chemicals.
- **Safety Data Sheets (SDS):** Chemical manufacturers are also required to provide SDS for applicable products. OSHA requires SDS for materials that:
  - a) meet OSHA's definition of hazardous, and
  - b) are known to be present in the workplace in such a manner that employee's or members may be exposed under normal conditions of use or in a foreseeable Emergency Action Plan.

Exempted from MSDS requirements are household/consumer products used in the workplace as long as the product is not used at a duration and frequency greater than what a normal consumer would experience (example-use of furniture polish to clean one's own office would not require SDS but use of furniture polish to clean many offices in the course one's job would require SDS). The Health and Safety Officer or his/her designee will review all purchases of products requiring SDS and will ensure that SDS are available to all employees using such products. In addition, employees who work with products requiring SDS will receive training regarding contents of SDS and how to locate SDS.

## Storage

- Products are to be stored in their original containers, clearly labeled.
- Store gasoline only in safety-approved containers in a well-ventilated area away from all sources of heat, flame or spark. Store LP (liquid propane) gas tanks such as those used with gas-fueled barbeque grills, outdoors and away from all sources of heat, flame or spark.

## Disposal

- Prior to disposal, staff will determine whether materials suspected to be of a hazardous nature may be legally disposed of in the sewer system or landfill. Advice on disposal of suspected hazardous materials may be present on product labeling, or may be sought through the Health and Safety Officer.
- The Health and Safety Officer is responsible for the disposal of bio-hazardous or regulated medical waste, including sharps as defined in Independence Center Infection Control and Universal Precaution policies and procedures. Please refer to the Independence Center Infection Control and Universal Precautions policies for protocols for cleaning and disposal of materials in the event of a bodily fluid spill.

All hazardous materials will be disposed of in accordance with established Environmental Protection Agency (EPA) guidelines. Such materials include, but are not limited to:

- Florescent Light Bulbs
- Thermometers
- Oil Based Paints, Thinners and Solvents
- Batteries
- Computer Equipment
- Industrial Chemicals
- Flammable Substances
- Caustic Substances
- Bio-hazardous Substances
- Copier Toner

In the event of a hazardous materials spill the Emergency Action Plan for fire emergencies shall be enacted by the Incident Commander on site.

See [Emergency Action Plan: Fire Emergencies](#), [Safety Data Sheets](#), [Infection Control](#), [Universal Precautions](#)

# NONVIOLENT PRACTICES

---

**Policy:** The purpose of this policy is to promote the rights of individuals served and protect the health and safety of individuals served during emergencies. This policy will also promote appropriate and safe interventions needed when addressing behavioral situations. No restraint or seclusion is ever used at Independence or on Independence Center properties.

**Scope:** All Staff

Page 1 of 1

**Revised:** December 2022

---

Personnel of Independence Center are not allowed to use seclusion or restraint. The Independence Center personnel are prohibited from using chemical restraints, mechanical restraints, manual restraints, time out, seclusion, or any other aversive or deprivation procedures as a substitute for adequate staffing, for a behavioral or therapeutic program to reduce or eliminate behavior, as punishment, or for staff convenience.

It is Independence Center's policy to ensure the correct use of Emergency Action Plan procedures to provide training and monitoring of direct support staff, and to ensure policies regarding the use of positive support strategies are followed by personnel.

All Independence Center personnel will be trained upon hire and annually on nonviolent practices. Independence Center utilizes the Pro-Act model positive support strategies.

When persons served or other individuals fail to meet Independence Center's behavioral expectations, personnel will follow Independence Center protocols and policies for addressing such behavior. This policy includes all individuals regardless of age or disability.

If an individual becomes aggressive and/or assaultive, personnel of the Independence Center shall take the steps necessary to de-escalate the situation. If an individual employed by Independence Center is assaulted, they should take evasive action and only use self-defense necessary to escape the situation. Actions will only be considered self-defense if they are required to protect one's person or to minimize the impact of an assault. Self-protection and the protection of others should be the primary concern as well as the safety of the person engaged in the violent behavior. Personnel will follow Emergency Action Plan procedures regarding an act of violence see [Emergency Action Plan: Workplace Violence](#).

A de-briefing will occur as soon as is possible and appropriate after incidents involving aggressive or combative behaviors. See debriefing policy [Emergency Action Plan: Debriefings](#).

# **SAFETY AWAY FROM CENTER – COMMUNITY ACTIVITIES AND ELOPEMENT/WANDERING**

---

**Policy:** The Independence Center’s policy is to ensure safety when persons are away from Independence Center facilities or on community activities.

**Scope:** All Staff

**Page 1 of 1**

**Revised:** December 2022

---

## ***Procedure***

The following safety precautions should be taken when working outside of Independence Center facilities:

- When transporting persons served, persons served and staff should adhere to all applicable policies and procedures in Transportation Manual.
- A list of persons on outing and the vehicles they are traveling in should be maintained on all outings. Persons on outings shall be instructed to return in the vehicle in which they were transported to the outing.
- When on an outing in the community, coordination of outings should include: destination, instructions on what to do in the event you are separated from the group including; where to go if lost and time of return. Staff should carry a cell phone and notify information booth/security if available at outing site. Notification of information booth/security should include the fact that you are escorting a group of individuals and that if any group members are to go astray or have an emergency, they should contact you at the cell phone number which is to be provided to the information booth/security. Information booth/security personnel at the site should be notified that you have instructed persons on outing to go to the information booth/security if assistance is needed.
- If the missing person cannot be located by the scheduled conclusion of the outing and the said person is determined to be at risk of harm to self or by others if left alone, then the person’s emergency contact will be contacted.

# **SAFETY AWAY FROM CENTER – HOME, HOUSING, SITE VISITS**

---

**Policy:** It is the Independence Center’s policy to ensure safety of persons during home visits and during site visits to Independence Center housing facilities.

**Scope:** All Staff

Page 1 of 1

**Revised:** December 2022

---

## **Before the Visit:**

Staff will indicate destination to supervisor and on Independence Center’s CIS software schedule when making home visits. Gather information about the person served you are visiting. Get clear directions and visit during daylight hours. In emergency situations where a night visit is necessitated request a police escort. Request another staff member if you don’t feel safe. Bring a copy of the Independence Center’s Emergency Action Plan on all home visits and always carry a cell phone.

## **During the Visit:**

Upon arrival at the person’s served residence, staff will knock or ring doorbell and allow sufficient time for the person served to answer the door. If the person served is housed at an Independence Center housing facility, staff should only enter with a key if sufficient time has passed for the person served to answer the door. Upon entry to an Independence Center housing facility, the staff should announce their presence clearly.

When entering the person’s housing the staff should assess the situation for potential safety hazards (e.g. environmental hazards, escalated behaviors that may pose a safety concern for self or others, observation of potential weapons, etc.). If such safety hazards are apparent, staff should exit the residence immediately and determine the appropriate course of action, according to Independence Center policies. See Emergency Action Plan Plans.

After entering the residence, staff should continue to monitor for safety risks and terminate visit upon emergence of any such risks. Maintain a clear path to the door at all times.

**DO NOT PUT YOURSELF OR OTHERS AT ADDED RISK.**

Respect individual space. At no time should staff enter a person’s served sleeping area or bathroom with a member or with the door closed in facilities with separate bedroom areas. Staff should not be in the bathroom with a person served with the bathroom door closed.

Staff and persons served should be fully clothed during the entire visit. If a person served is not fully dressed upon arrival of staff, staff should exit and allow the person served to get dressed before proceeding with the visit.

If there is any injury or assault during the home visit, staff should immediately exit and ensure that any and all injured parties receive the appropriate emergency services.

# TOBACCO/SMOKING

---

**Policy:** To maintain a smoke-free environment.

**Scope:** All Staff

Page 1 of 1

**Revised:** December 2022

---

Independence Center complies with all laws controlling smoking in the workplace. In the interest of providing a healthy and safe environment for all employees, persons served and visitors, Independence Center maintains a smoke-free environment policy. Smoking and the use of any other tobacco products is not allowed in any property owned, leased or managed by the Independence Center including its vehicles. Other smoking devices that do not utilize tobacco are still not allowed this includes but not limited to: electronic cigarettes, E-cigs, Smokeless electric cigarette, flavored e-juice and vapor smoking accessories. Residential sites permit smoking only in designated areas other uses of tobacco are covered by the tenant's rules and regulations and/or resident handbook. Employees, persons served and visitors must exercise extreme care regarding the fire hazards associated with smoking and the disposal of smoking debris, as to their own smoking and the smoking of other employees, persons served and visitors.

Smoking is allowed outside of the Center's buildings only and must be at least 25 feet from any entry/ exit as required by Illinois state law. Employees with inquiries or complaints about smoking at any Independence Center property should contact their supervisors.

# NO ILLICIT DRUGS POLICY

---

**Policy:** To ensure that the Independence Center remains safe no illicit drugs will be allowed on Independence Center property.

**Scope:** All Staff and Members

Page 1 of 1

**Revised:** December 2022

---

Independence Center has a policy to maintain a drug free environment. We expect all staff, persons served or visitors of the Independence Center to refrain from unlawful manufacture, possession, distribution, purchasing, selling, of alcohol, illicit drugs and/or controlled substances, including prescription drugs. Employees may not use or be under the influence of alcohol or illegal drugs, while on duty, or while operating a vehicle or machines leased or owned by the agency. "Illegal drugs" includes prescription drugs illegally obtained, and/or prescription drugs that are not recognized by the federal government (such as prescribed marijuana). Illegal drug use in the workplace is prohibited under all circumstances, including attendance at business-related activities. Any staff, persons served or visitors to the Independence Center will be required to keep all legally prescribed or over the counter drugs on their own person or locked in a secure location.

**ALL EMPLOYEES:** Also see [Human Resources Manual Appendix VI.docx](#)



# NO WEAPONS POLICY

---

**Policy:** In the interest of maintaining an environment that is safe and free of violence for its employees, persons served and visitors, Independence Center prohibits the wearing, transporting, storage, presence or use of dangerous weapons on company property.

**Scope:** All Staff and Members

Page 1 of 1

**Revised:** December 2022

---

In the interest of maintaining an environment that is safe and free of violence for its employees, persons served and visitors, Independence Center prohibits the wearing, transporting, storage, presence or use of dangerous weapons on company property, regardless of whether or not the person is licensed to carry the weapon. Any employee who violates this policy is subject to disciplinary action, up to and including discharge. An employee, person served or visitor who violates this policy may be removed from the property and reported to police authorities. This policy does not apply to any law enforcement personnel engaging in official duties.

“Company Property” covered by this policy includes all company-owned or leased buildings and surrounding areas, such as sidewalks, walkways, parking lots and driveways under the company's ownership or control. Furthermore, this policy applies to all company-owned or leased vehicles and all vehicles that come onto company property.

“Dangerous Weapons” include, but are not limited to, handguns, firearms, explosives, knives and any tool used to apply or threaten to apply force for the purpose of attack or defense (e.g. tire irons, bats, chains, brass knuckles, pepper spray, handcuffs or other weapons further defined by Illinois statute and/or local ordinance).

If employees have questions regarding whether an item is covered under this policy, they should contact their supervisor. Employees have the responsibility to make sure that any item that is possessed by them is not prohibited by this policy.

Independence Center reserves the right at any time and at its discretion to search all company-owned or leased vehicles and all vehicles, packages, containers, briefcases, purses, lockers, desks and persons entering company property, for the purpose of determining whether any dangerous weapon has been brought onto company property or premises in violation of this policy. Any employee failing or refusing to promptly permit a search under this policy will be subject to discipline up to and including termination.

# OFFICE ERGONOMICS

---

**Policy:** To maintain and identify risk factors that contribute to safe-work environment.

**Scope:** All Staff

Page 1 of 4

**Revised:** July 2011

---

Many painful and sometimes disabling injuries are caused when employees function in unsafe environments. In the interest of providing a healthy and safe environment for all employees and members, Independence Center maintains an office ergonomics policy. Employees and members should exercise care regarding the safe ergonomic practices in the work place.

## Ergonomics

Ergonomics is the study of the relationship between people, their activities, their equipment, and their environment. The goal of ergonomics is the enhancement of human performance while improving health, comfort, safety, and job satisfaction.

## Risk Factors

Risk Factors are elements or components of a task that increase the probability of cause or contribution to musculoskeletal disorders. Listed below are some occupational and personal risk factors:

- Repetition
- Force
- Forceful Exertions
- Awkward Postures
- Static Postures
- Contact Stress
- Environmental Factors
- Psychosocial Issues
- Smoking
- Medical Factors
- Hobbies
- Sports

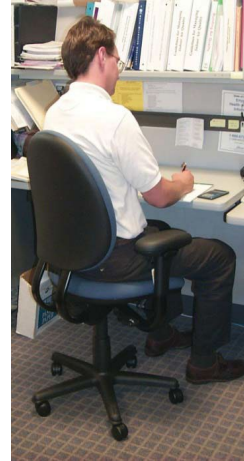
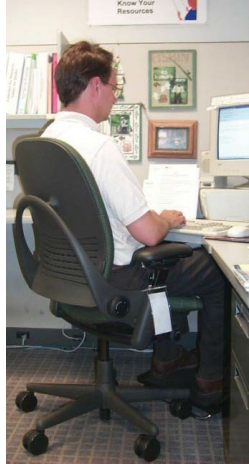
## The following safety procedures apply:

### Your Responsibilities:

- Encourage functional and effective work environments
- Learn and use adjustment features
- Organize workflow
- Use neutral body postures
- Stretch/exercise
- Rotate job tasks
- Promote positive employee, supervisor relations
- Report symptoms promptly
- Demonstrate self-responsibility and healthy lifestyles
- Perform a self-evaluation and modify workstation, job or habits

## 1. Accepted Postures

- Thighs declined
- Reclined
- Standing
- Move throughout these postures



## 2. Sitting Basics

- Hips slightly higher than knees
- Feet supported
- Lumbar support below beltline
- Back Angle upright or slightly reclined
- Arms relaxed or supported



### 3. Work Surface Basics

- Designs should be based on job tasks
- Surfaces should be height adjustable
- Reading/writing surface 2 inches higher than elbow height
- Keyboard/mouse surface elbow height.



### 4. Keyboard/Mouse Basics

- At or slightly lower than elbow height
- Neutral wrist postures
- Relax shoulders
- Use a light touch

### 3. Alternative Input Devices

- Split keyboard design
- Vertical or Concave keyboard design
- Trackball
- Touchpad
- Mouse with a supinated angle
- Always use on a trial basis prior

### 4. Monitor Basics

- 25-36 inches from eyes
- At or slightly lower than eye level
- Direct alignment
- Avoid glare or contrast from bright light sources

### 5. Additional Monitor Basics

- Ambient light levels 20-50 foot-candles
- Refresh rate 70-80 Hz
- Dark characters on a light background
- Clean monitor at least 1x per week

### 6. Telephone Basics

- Avoid cradling the hand set between your shoulder and head
- Hold the hand set with your non-dominant hand.
- Use a headset or speaker phone when appropriate

### 7. Source Documents

- Document holder – adjacent to monitor – between monitor and keyboard
- Reading/Writing Slope

### 8. Additional Accessories

- Large grip pen/pencil – decrease stress on muscles/tendons
- Wrist rest – use only while pausing between key strokes
- Footrest –essential when feet do not touch the floor –help promote postural changes

## **9. Work/Rest Schedules**

- Rotate job tasks at least 1x per hour
- Utilize breaks
- Incorporate stretching into daily routine
- Change postures frequently
- Get out of your chair

## **10. Manual Material Handling**

- Use good body mechanics
- Know your abilities
- Push/pull instead of lift/carry

# **PARKING SAFETY**

---

**Policy:** It is the Independence Center’s policy to ensure safety of persons who park vehicles at center properties/during Center related activities.

**Scope:** All persons of the center

**Page 1 of 1**

**Revised:** January 2023

---

## ***Procedure***

- Do not stop your car if threatened
- Staff will lock car doors upon exiting
- Always park in a well-lit visible area. Park on the street, so that you can leave quickly, if you need to
- Staff will keep all valuables out of sight
- Don’t get out of the car if you feel unsafe
- Carry as little as possible
- Call 911 if the situation warrants
- Call police non-emergency number for a police escort, if needed.
- USE COMMON SENSE!!

# HEALTH AND SAFETY INSPECTIONS

---

**Policy:** The Independence Center will have at least 2 external health and safety inspections annually.

**Scope:** All Staff

Page 1 of 1

**Revised:** January 2023

---

A minimum of 2 external inspections will be conducted every year at all Independence Center sites. A report will document the areas covered and provide recommendations for improvement. The Health and Safety Committee will develop a plan of correction on the basis of their recommendations.

These inspections may be done by the following:

- Fire Marshall
- Representative of the Fire Department
- Licensed or registered safety engineer
- A representative of state/provincial/federal agency that provides OSHA, or health or physical plant inspections
- An engineer involved in industrial operation
- A safety specialist
- A safety consultant who represents the Independence Center's fire or worker's compensation carrier
- An industrial health specialist
- Independence Center's insurance carrier or private insurance carrier

The externally conducted inspection may include the following:

- Emergency warning devices, means of egress and Emergency plan.
- Operation involving hazardous materials and processes, including the safe and effective management of bio-hazardous materials.
- Electrical
- Walking and working surfaces
- Health and sanitation provisions with regards to food preparation, eating areas, and air contaminants
- The working environment, including ventilation, illumination, noise and air contaminants.

# PROCEDURE FOR SAFETY CHECKS AND CORRECTIVE ACTION PLANS

---

**Policy:** The Independence Center staff will adhere to the following procedure and will develop Plans of Correction for safety inspections.

**Scope:** All Staff

Page 1 of 1

**Revised:** March 2003

---

## *Procedure*

- Obtain floor plans if possible: Make notes on the plan while you're conducting the survey.
- Conduct the survey: You will need help measuring and documenting. Get someone to help you. Think about each area from the perspective of people with physical, hearing, visual and cognitive disabilities. Note areas that need improvement.
- Summarize Barriers and Solutions. Each of our facilities does not have to meet ADA specifications, however if there is an area in your facility that could be improved, how could it be accomplished? Work with the Facility Manager/Supervisor to develop possible solutions and modifications.
- Make Decisions & Set Priorities: The Facility Manager and others will make any final decisions. Help decide which solutions will best eliminate barriers at reasonable or no cost. Prioritize the items decided upon and make a timeline for carrying them out. Where the removal of barriers is not readily achievable, consider whether there are alternative methods for providing access that are readily achievable.

### **NOTE!**

Changes involving safety, such as visual alarms are absolutely necessary if there are staff or consumers who require these types of modifications.

- Maintain Documentation: Keep the survey, summary and record of any work completed; request for work, and plans for alternative methods.
- Make the changes.
- Follow Up: Review your plan on a regular basis, at least yearly, to re-evaluate whether more improvements have become readily available. Consult with your Facility Manager/Supervisor.



# Addendum I: Covid Policies

## **COVID-19 PREPAREDNESS PLAN**

---

The Independence Center COVID-19 Preparedness Plan shall establish and explain the policies, practices, and conditions necessary to meet the COVID-19 atmosphere related to employment and service provision during this time.

Independence Center is committed to providing a safe and healthy Independence Center for all our workers and members. To ensure a safe and healthy Independence Center, we have developed the following COVID-19 Preparedness Plan in response to the COVID-19 pandemic. Managers and workers are all responsible for implementing this plan. Our goal is to mitigate the potential for transmission of COVID-19 in our Independence Centers and communities, which requires full cooperation among our workers, management, and members. Only through this cooperative effort can we establish and maintain the safety and health of our workers, members, and Independence Centers.

Management and workers are responsible for implementing and complying with all aspects of this COVID-19 Preparedness Plan.

Our Personnel and Members are our most valuable assets. We are serious about safety and health and keeping Independence Center a desirable place to work. We have involved our workforce in this process by meeting with staff at various meetings to discuss concerns, meeting with departments to address departmental and accessibility concerns. Our COVID-19 Preparedness Plan follows the Centers for Disease Control and Prevention (CDC), State of Illinois Public Health Department, and Lake County Health Department (LCHD) guidelines, federal OSHA standards related to COVID-19, and Executive Order 20-48, and addresses:

Infection prevention measures;

- Prompt identification and isolation of sick persons;
- Engineering and administrative controls for social distancing;
- Cleaning, disinfecting, decontamination and ventilation;
- Communications, training, and supervision are necessary
- Protection and controls for Member transportation
- Protections and controls for in-Person services;
- Protections and controls for Community Services; and
- Communications and instructions for members

### **SCREENING AND POLICIES FOR EMPLOYEES EXHIBITING SIGNS AND SYMPTOMS OF COVID-19**

Employees have been informed of and encouraged to self-monitor for signs and symptoms of COVID-19. The following policies and procedures are being implemented to assess workers' health status before entering the Independence Center and report when they are sick or experiencing symptoms.

The following policies and procedures are being implemented to assess workers' health status before entering the Independence Center and report when they are sick or experiencing symptoms.

Independence Center has implemented leave policies that promote workers staying at home when they are sick, when household members are sick, or when required by a health care provider to isolate or quarantine themselves or a member of their household. Independence Center will adhere to the Families First

Coronavirus Response Act (FFCRA) for paid sick leave and not punish staff for emergency sick leave. Accommodations for workers with underlying medical conditions or household members with underlying conditions health conditions have been implemented.

Independence Center has implemented a policy for informing workers if they have been exposed to a person with COVID-19 at their Independence Center and requiring them to quarantine for the required amount of time. [Independence Center COVID Notifications Policy](#)

In addition, Independence Center adheres to HIPAA policies to protect the privacy of workers' health status and health information.

## **HANDWASHING**

Basic infection prevention measures are being implemented at our Independence Centers at all times. Employees are instructed to wash their hands for at least 20 seconds with soap and water frequently. Handwashing should be done throughout the day, especially at the beginning and end of their shift, before mealtimes, and after using the toilet. All members and visitors to the Independence Center will be required to wash or sanitize their hands before or immediately entering the facility. Hand sanitizer dispensers are at entrances and locations in the Independence Center for hand hygiene in place of soap and water, as long as hands are not visibly soiled. [See Universal Health Care Precautions](#)

Respiratory etiquette: Cover your cough or sneeze

Employees, members, and visitors are being instructed to cover their mouth and nose with their sleeve or a tissue when coughing or sneezing and avoid touching their face, particularly their mouth, nose, and eyes, with their hands. They should dispose of tissues in provided trash receptacles and wash or sanitize their hands immediately afterward. Respiratory etiquette will be demonstrated on posters and supported by making tissues and trash receptacles available to all workers, members, and visitors.

## **SOCIAL DISTANCING**

The social distancing of six feet will be implemented and maintained between employees, members, and visitors in the Independence Center through the following engineering and administrative controls [Social Distancing Policy](#): Staff will be allowed to perform most administrative tasks from home, a staggered schedule will be utilized to avoid having entire departments/ programs working onsite simultaneously, bathrooms and shared common areas such as the mailroom will only allow one individual peruse, Shared resources such as the refrigerator, water dispenser, and coffee maker will not be available for use. Leadership will avoid occupying the office at the same time. Chairs will be removed from areas to avoid clustering of people. Desks and stations will be moved to an appropriate distance where possible. When physical distance can not be obtained by moving areas within distance will be left vacant. Office and reception areas will be outfitted for physical barriers. Independence Center will follow the state's mitigation requisites for occupancy, member numbers, flow, and interactions will be safely conducted during drop-off, pickup, delivery, and in-store shopping. Employees, visitors, and members will be prevented from gathering in common areas and confined areas, including elevators. Employees are expected to wear masks in areas occupied by others. Employees should avoid sharing equipment such as phones, pens, and computer equipment. Employees must sanitize before and after each use for work equipment that must be shared, such as desks, cubicles, workstations, offices, or other personal work tools. Employees transporting members in passenger cars should have individuals sit in the back seat of the vehicle behind the car barrier and maintain an opening of a least two

windows on each side of the vehicle. In the larger vehicles, passengers must be seated 6 feet apart, and the driver must be seated in front of the barrier with the window open. Changes to the plan will be shared at staff meetings, supervision, and emails. Independence Center will provide protective supplies, such as masks, nonmedical cloth face coverings, gloves, disinfectants, face shields for workers.

## **CLEANING, DISINFECTION, AND VENTILATION**

Regular housekeeping practices are being implemented, including routine cleaning and disinfecting of work surfaces, equipment, tools and machinery, delivery vehicles, and areas in the work environment, including restrooms, break rooms, lunchrooms, and meeting rooms. Employees are expected to clean and disinfect high-touch areas, such as phones, keyboards, door handles, elevator panels, railings, copy machines, delivery equipment, etc., in their Area. An external janitorial service will regularly clean and sanitize the bathroom, mailroom, and kitchen if needed because an individual is symptomatic or is diagnosed with COVID-19.]

Appropriate and effective cleaning and disinfectant supplies have been purchased. They are available for use by product labels, safety data sheets, and manufacturer specifications and are being used with required personal protective equipment for the product. The maximum amount of fresh air is brought into the Independence Center, air recirculation is limited, and ventilation systems are correctly used and maintained. Steps are also being taken to minimize airflow blowing across people.

## **COMMUNICATIONS AND TRAINING**

This COVID-19 Preparedness Plan communicated an all-staff meeting to all employees on April 23, 2020, and necessary training was provided. Additional communication and training will be ongoing at planning days, staff and management meetings. Members and visitors will also be

advised not to enter the Independence Center if they are experiencing symptoms or have contracted COVID-19 via website, in-person, phone, and signage on front doors. Managers and supervisors are to monitor how effective the program has been implemented. Management and employees are to work through this new plan together and update the training as necessary. This COVID-19 Preparedness Plan has been approved by Independence Center management. It will be updated as necessary.

# **SOCIAL DISTANCING POLICY**

---

Social Distancing while you are working in the [midst/wake] of the 2019 novel coronavirus disease (COVID19) pandemic, Independence Center wants to assure you of its continued commitment to maintaining a safe and healthy workplace and that we are taking additional measures to protect you, your coworkers, members, guests, and your families from the spread of COVID-19. As part of those efforts, we are implementing a new Social Distancing Policy.

## **Importance of Social Distancing**

The Centers for Disease Control and Prevention (CDC) has found that one of the most effective ways of preventing the spread of COVID-19 is limiting face-to-face contact with others, known as social distancing or physical distancing. The Occupational Safety and Health Authority (OSHA) similarly recommends increased social distancing when preparing workplaces to respond to COVID-19.

This Social Distancing Policy is crucial for our overall strategy and commitment to maintaining a healthy workplace in light of the COVID-19 pandemic. Although knowledge about the virus and how it spreads is evolving, based on the information we have now, these measures will help curb its spread. Compliance with this policy is essential because current consensus on the virus suggests, among other things, that:

- COVID-19 is highly contagious.
- COVID-19 spreads primarily among people who are in close contact (within about 6 feet or two arms' lengths) for a prolonged period (between 10 and 30 minutes, depending on the distance).
- The virus generally spreads when an infected person coughs, sneezes, or talks, and droplets from their mouth or nose get in the air and land in the mouths or noses of nearby people.
- A person who has the virus may not have any symptoms but may still spread COVID-19.
- A person can get COVID-19 by touching another person, such as with a handshake, or by touching another surface or object with the virus on it and then touching their mouth, nose, or eyes.
- The virus can live on surfaces for up to several days, depending on the surface and other conditions.

For these reasons, the CDC and other public health experts have recommended limiting contact with other people and joint surfaces to limit the spread of COVID-19. We need your full cooperation and compliance with these measures to make them effective in this new work environment.

## **Social Distancing Measures**

Following the CDC's guidance, Independence Center requires you to comply with the following protocols and procedures while on-site or on-location.

- **Schedule Changes:** Independence Center may change your schedule to minimize the number of employees in the workplace at any given time.

These changes may involve any combination of:

- Alternate day work schedules;
- Staggered lunch and break times; and
- Staggered arrival and departure times.
- **Large Gatherings Prohibited.** Large in-person gatherings and in-person meetings of more than ten people are prohibited in the workplace until further notice.
- However, nothing in this policy prohibits employees from communicating with one another about workplace issues or gathering virtually using audio, visual, or other technology.

- Six-Foot Distance. Maintain a six-foot distance from others when crossing paths or walking near others' desks or workstations.

Observe all space markings and traffic flow directions, including:

- Six-foot distance reminders on floors or walls in locations where employees traditionally have gathered or may need to wait for entrance to a space or for equipment use; and
- Newly designated one-way pathways between desk clusters and other areas where
- Six-foot distancing is not possible with two-way traffic flow.
- No Physical Greetings. Do not shake hands or greet others in any manner that requires physical contact (such as fist or elbow bumps). In the "new normal" this is considered polite, not rude.
- Visitor Limitations. All personal visitors are prohibited until further notice, except in cases of emergency. All other visitors are prohibited unless they are essential to the performance of the job.
- Shared Supplies and Equipment. Do not share supplies and equipment. Limit the use of shared photos, video, and other equipment, such as cameras, lights, and scanners, to the extent consistent with necessity.

If you need to use this equipment:

- maintain a six-foot distance from others when waiting to use the equipment;
- use hand sanitizer before and after each use;
- use disposable gloves provided when using shared equipment; and,
- disinfect equipment with wipes before and after each use on all touch surfaces.

Be Flexible. Adhere to new guidelines as they emerge, as this issue is new and evolving.

### **Policy Modification**

Government and public health guidelines and restrictions and business and industry best practices regarding COVID-19 are changing rapidly as new information becomes available and further research is conducted. Independence Center reserves the right to modify this policy at any time in its sole discretion to adapt to changing circumstances and business needs, consistent with its commitment to maintaining a safe and healthy workplace.

### **Enforcement and Non-Retaliation**

Failure to comply with these social distancing measures may result in discipline, up to and including termination of employment.

If you witness or become aware of any employees or other individuals violating this policy, you must immediately report them to the corporate compliance officer. Independence Center prohibits any form of discipline, reprisal, intimidation, or retaliation for reporting a violation of this policy or any other health and safety concern.

## **INDEPENDENCE CENTER COVID-19 NOTIFICATIONS**

---

All employees and supervisors are expected to notify the executive director, the assistant director, human resources, and the health and safety manager if they test positive for COVID-19. Employees must also notify if they become aware that another individual present in the worksite (employee, member, contractor, guest, etc.) has been confirmed as having COVID-19. When such a notification occurs, or Independence Center becomes aware that a person with confirmed COVID-19 has been in the workplace by any other means, the following measures will be taken:

1. Based on a reasonable assessment of the activity of the individual with confirmed COVID-19, Independence Center will seek to identify each employee who was likely to have been within 6 feet of the infected individual for a cumulative total of 15 minutes or more. Those employees will be notified individually of the exposure (telephone, text message, or e-mail). They will be advised to seek guidance from their physician or local public health officials about testing options. The individual who was the source of the exposure will not be identified.

In addition, the following notification will be sent to everyone working in the facility where the exposure occurred, even if they did not appear to have close contact with the individual in question:

2. We have been notified that an individual present at Independence Center has been diagnosed with COVID-19. We are notifying those individuals who appear to have had close contact with the individual, but we want to alert everyone to the possibility of exposure.

If you experience symptoms of COVID-19 illness, please inform your supervisor and contact your health care provider. Independence Center will always protect all employee medical information and disclose it only to the degree such disclosure is strictly necessary.

For more information on COVID-19, including symptoms you may want to know, please visit the Lake County Health Department's website [Coronavirus Disease 2019 \(COVID-19\)](#) or the US Centers for Disease Control & Prevention [COVID-19](#) website.

If you have any questions or concerns, don't hesitate to contact the Health and Safety manager.