

# **Camden Co. Developmental Disability Resources**

## **Risk Management Plan**

(Revised 10/20/14)

## **PART I: GENERAL RISK MANAGEMENT PROCEDURES**

### **A. Risk Management Philosophy**

Camden County Developmental Disability Resources (CCDDR) seeks to involve all staff and board members in identifying and mitigating potential areas of risk. The views and participation of all CCDDR staff and board members will be sought as CCDDR identifies risk management priorities and implements strategies for modifying, retaining or financing risk. Risk Management includes not only protection of assets through safety measures and procurement of insurance, but also monitoring potential threats to the board, such as loss of revenues. Annual reviews of CCDDR's Risk Management Plan shall be performed by the Administrative Planning Team and presented to the CCDDR Board of Directors when revisions are necessary.

What is risk?

Risks are any uncertainties about a future event that threatens CCDDR's ability to accomplish its mission. As with other nonprofit agencies, "assets" fall into the following categories.

- People – board members, volunteers, employees, clients, donors, and the public
- Property – buildings, facilities, equipment, materials
- Income – tax revenues, Medicaid billing, grants, and contributions
- Goodwill – reputation, stature in the community, and the ability to raise funds and appeal to prospective volunteers

CCDDR's risk management efforts should ideally be tailored to identify and mitigate risks in each of these areas.

### **B. Statement of Policy**

It is the primary objective of CCDDR to assure not only the physical health and safety of all members of the agency, including staff, but also the health and safety of persons served by the agency. As such, this Risk Management Plan will address both of these areas. Therefore, it is the policy of CCDDR to conduct its operations in accordance with accepted safety rules and procedures, with the idea that safety is of first importance in the discharge of duties.

Safety and health hazards and potential loss situations in the workplace can be minimized through leadership of management. However, all employees must support and cooperate with the safety policies, programs and procedures in order for this endeavor to be successful.

All employees are encouraged to participate, cooperate, and support the CCDDR goal of a safe, healthy, and accident-free workplace. All CCDDR Support Coordination staff shall also make every effort to ensure that consumers served in community settings are also supported in healthy and safe settings. Individually and collectively, all CCDDR

employees have a role and responsibility in working towards these safety and health objectives not only for themselves, but also to provide safe and efficient service to our local citizens and the general public.

### **C. Risk Management Goals**

CCDDR seeks to involve appropriate personnel at all levels of the organization in the identification of risks and creation of practical strategies in order to make certain that the organization's approach to risk management considers diverse perspectives and staff understand their roles and responsibilities in protecting the mission and assets of the organization. The primary goals of the CCDDR Risk Management Program are:

- Ensure the health and safety of employees, volunteers, and guests of CCDDR
- Ensure the health and safety of all consumers served in community settings that are monitored by CCDDR.

### **D. Areas of Potential Liability**

#### General Liability

CCDDR's property and liability risks will be assessed by written surveys identifying any exposures or potential hazards. A thorough, well-documented, and regularly scheduled self-inspection of our premises will be completed, and the necessary steps will be taken to minimize the impact on possible losses.

#### Dishonesty/Crime

A fidelity risk is the loss or destruction of money or securities due to theft, fire, dishonesty, or improper appropriation or use of agency funds. The prudent use of regular audits and financial reviews should reveal if where and when fidelity risks are present. Individuals in positions where money or securities are present will be bonded, and a reputable accounting firm will complete an annual financial audit.

#### Contractual Liability

Contractual liabilities can occur as a result of contracts including purchase and sales agreements, leases, bond indentures, mortgage or loan agreements, construction contracts, and service contracts. Only CCDDR's Executive Director, authorized agents of the Executive Director, or authorized agents of the Board of Directors can sign contracts on behalf of CCDDR. The CCDDR Board of Directors may from time to time authorize a thorough review of all contracts and legal documents by legal counsel and MOPERM to reduce exposures in this area. A Certificate of Commercial General Liability (CGL) Insurance naming CCDDR as an "additional insured" will be requested whenever CCDDR enters into a contract with a contractor. It is important to remember there is a distinction between being listed as "certificate holder" and being listed as an "additional insured". A "certificate holder" does not automatically have "additional insured" status and therefore does not protect CCDDR.

#### Tort Liability

Tort liabilities often result from alleged actions, errors, or omissions by officials. To reduce agency exposures in this area, any new bylaws, or policies/procedures may be subject to review by CCDDR's legal counsel prior to adoption.

### Employment Practices

Employment Practices Liabilities can be reduced by strictly following established written Personnel Policies and Procedures. All employment-related decisions will be thoroughly reviewed by management and may be reviewed by legal counsel as well prior to any action being taken.

## **E. General Safety Principles**

- CCDDR strives at all times to operate in compliance with local, state, and federal laws and regulations
- CCDDR shall adhere to the policies and standards of the Commission on Accreditation of Rehabilitation Facilities (CARF) in matters related to the health, safety, and well-being of service recipients
- All persons affiliated with CCDDR bear responsibility for the health, safety, and security of service recipients, which is a primary responsibility of the Board of Directors, Executive Director, operational volunteers, and program staff
- Safety and risk management strategies are multi-faceted and include:
  - ✓ Thoughtful screening, selection and training of operational volunteers and paid staff.
  - ✓ Creation and enforcement of policies, standards, guidelines, and procedures as guides for planning.
  - ✓ Effectively monitoring services provided by agencies serving consumers with developmental disabilities.
  - ✓ Maintaining safe and secure facilities.
  - ✓ Establishing procedures to be followed in the event of an emergency.
  - ✓ Maintaining clear communications channels.
  - ✓ CCDDR purchases insurance coverage as a financing mechanism for certain risks, but recognizes that insurance is not a substitute for vigilance in planning and implementing programs.

## **F. General Safety Rules**

The following General Safety Rules are prescribed guidelines for proper employee behavior, conduct and action. These are general safety rules that apply at all work locations for CCDDR. They will be posted in a conspicuous manner. These rules will be reviewed annually and updated as needed. All personnel will be held accountable for adhering to these rules.

- Follow instructions, don't take chances, and if you don't know, ask.
- Obey all rules, signs, and instructions

- Report immediately to your supervisor any condition or practice you think might cause injury to employees or consumers served in community settings, might cause injury to the general public, or might cause damage to public or private property and equipment
- Know the location of fire/safety exits and evacuation procedures
- Keep all emergency equipment, such as fire extinguishers, fire alarms, fire hoses, exit doors, and stairways, clear of any obstacles
- Report any faulty electrical equipment. It will be removed from service until it can be repaired or replaced
- Practice and promote good housekeeping, put everything you use in its proper place, and keep your work area clean – proper housekeeping is mandatory for all areas
- Do not remove any guards or other protective devices from any type of equipment
- Use, adjust, alter, and repair equipment only when authorized
- Always wear the required Personal Protective Equipment (PPE) if required as a form of Universal Precautions and if you need additional equipment to safely perform the job, contact your supervisor
- **Ask and insist on sufficient help** before lifting heavy objects; when lifting, keep your back reasonably straight, bend your knees, and grasp the load firmly; raise (and lower) the load by using your legs (not your back); avoid twisting your body while lifting; and use mechanical devices when available
- No employee under the influence of alcohol or controlled substances shall be permitted to enter or remain in the workplace – the presence or use of alcohol or unauthorized drugs/substances by any employee in the workplace is strictly prohibited and is a violation of our Substance Abuse Policy (see Employee Manual)

## **G. Accident Investigation and Reporting**

A CCDDR employee who is injured on the job or involved in some type of an accident must report the situation to his or her supervisor as soon as possible. Any employee witnessing an accident at work is to call for emergency help or whatever assistance appears to be necessary. In addition, the employee is to immediately report the accident to the CCDDR Compliance Manager, Executive Director, or other authorized manager and take part in answering any questions related to the situation. When an employee is involved in or is a witness to a close call resulting in no damage or personal injury but which had the potential for both to occur, the employee must report it and submit a **Near Miss Report** form.

The Compliance Manager and Executive Director is responsible for investigating the accident, incident, or near miss. The investigation of accidents is not made for the purpose of placing blame on someone. Instead, the purpose is to ascertain the facts so that a reoccurrence of the accident is prevented. The Compliance Manager and Executive Director will attempt to determine the cause from the information gathered and take corrective action immediately, if necessary. The Compliance Manager and

Executive Director shall discuss the situation with the employee, any witnesses, and/or other relevant personnel as soon as possible after it has been reported and after any medical treatment. When the investigation is complete, the Compliance Manager will submit an **Accident Investigation Report** form.

Community Event Reports for consumers served in community settings is crucial to monitoring the health and safety of persons served in community settings. These processes are detailed in separate policies of the Board. Furthermore, staff with the Division of Developmental Disabilities is responsible for trending of incident reports involving consumers served to identify patterns and potential areas of staff training, etc. to reduce such incidents in the future. CCDDR shall obtain copies of such trending information performed by the Division in mitigating such incidents in the future.

A copy of the appropriate forms should be forwarded to the CCDDR Safety Officer, Targeted Case Management (TCM) Supervisor, Consumer Support Director, or other duly appointed staff member, who will review during their next regularly scheduled meeting.

## **H. MOPERM Liability Claim/Incident Reporting**

To report an incident or claim, the CCDDR Compliance Manager shall complete the appropriate form (**Automobile Loss Notice** or **Loss Notice Other Than Automobile**) found in the MOPERM Forms Section and forward to MOPERM. When possible, the loss notice should be faxed to their office at 573-751-8276.

The upper section of the claim form contains two (2) boxes, one marked **INCIDENT ONLY** and the other marked **NOTICE OF CLAIM**. The same form is used for reporting both incidents and claims by marking the correct box. If the Executive Director believes that MOPERM should take action on a matter, it must be marked **NOTICE OF CLAIM**. MOPERM does not take action on **INCIDENT ONLY** reports. These reports are kept as a record of a potential claim.

The Compliance Manager shall complete a report for the following:

- Any third party bodily injury or death
- Any property damage of a third party
- Any slip, trip, or fall incident – whether or not bodily injury is apparent
- Any automobile accident involving a covered vehicle – regardless of fault
- Any complaint about policies and procedures
- Any allegations of violations of Civil Rights
- Any other accident that may result in a claim

These situations should be reported to the MOPERM office as **claims** when the party involved has indicated they expect payment for their damages. **IT IS ESSENTIAL THAT ALL CLAIMS BE REPORTED TO THE MOPERM OFFICE PROMPTLY. THE COMPLIANCE MANAGER SHALL NOT WAIT TO SUBMIT THE CLAIM UNTIL THE**

**POLICE REPORT AND/OR ESTIMATES ARE OBTAINED.** These can be mailed or faxed under separate cover.

It is equally important that **incidents** of the above nature be reported promptly by the CCDDR Compliance Manager. Not all incidents result in claims, but all claims do start as incidents. By recording and reporting incidents, problems can be identified and alleviated before they turn into claims. A reduction in claims will save CCDDR money, so it is certainly worth the time and effort to adequately complete the appropriate claim form.

The number of incidents reported will not affect the annual contribution for insurance. When there is doubt about whether or not to report something, always report it to be on the safe side.

**IN THE EVENT OF SERIOUS INJURY, DEATH, OR CATASTROPHIC PROPERTY DAMAGE, THE COMPLIANCE MANAGER SHALL REPORT THE CLAIMS IMMEDIATELY BY CALLING MOPERM TOLL-FREE AT 888-389-8198. ON EVENINGS AND WEEKENDS, YOU MAY LEAVE A MESSAGE AT THIS NUMBER.**

## **I. Responsibility for Risk Management**

### Board of Directors

- Sets risk management goals & adopt annual operating objectives and budget with risk management included
- Reviews operational reports to determine compliance and future priorities.
- Ensures compliance with policies and standards imposed by CARF national accrediting organization
- Adopts and establishes policies and standards
- Reviews the organization's insurance program periodically, and reviews Risk Management reports
- Reviews the organization's risk management plan as needed

### Executive Director

- Designs and carries out safety and risk management activities
- Performs annual review of the safety and risk management activities.
- Executes and authorizes execution of contracts for the organization
- Keeps the board apprised of emerging threats and opportunities facing the organization
- Coordinates meetings of the Administrative Planning Team
- Develops, implements and monitors loss prevention programs
- Conducts contract reviews; develops indemnity agreements, hold-harmless agreements and consent forms in consultation with legal counsel as needed
- Coordinates the purchase of insurance, and monitors/evaluates the insurance program, maintaining appropriate funding levels, accurate loss forecasting, claims management, loss prevention and cost containment programs
- Integrates risk management throughout the organization's programs

### Administrative Planning Team

Currently, the Administrative Planning Team primarily consists of the Chairman of the Board, Executive Director, Consumer Support Director, Accounting Manager, and Compliance Manager. As CCDDR expands its services and consumer caseloads, the Administrative Planning Team may invite or add other participants as deemed necessary. All Board members are welcome to attend the team meetings. This committee:

- Convenes periodically, usually once per week, to review the agency's priority risks and corresponding risk management strategies
- Oversees the development, implementation and monitoring of loss prevention programs
- Reviews trending data with regard to Community Event Reports for CCDDR consumers served by the Board
- Evaluates the insurance program

### **J. Insurance Program for CCDDR**

#### Insurance Advisors

CCDDR seeks an array of services from its insurance advisors. These services include, but are not limited to:

- Advising and assisting the organization to purchase adequate insurance coverage at an appropriate price
- Assisting the organization to report claims and acting as the organization's advocate in negotiations with carriers
- Providing premium and loss reports on a periodic basis
- Providing contract review for insurance implications
- Delivering loss-control assistance and services
- Providing appropriate educational resources, for example, training sessions for employees, volunteers and the board of directors
- Keeping the organization abreast of critical developments in the insurance industry

### **K. Safety Training**

It is essential that CCDDR's safety training be conducted efficiently in order to provide for accident prevention. To accomplish this objective, the following training will be provided:

- To all new employees immediately upon the start of their employment
- To current employees as certifications (i.e. First Aid/CPR) expire
- When new equipment or processes are introduced
- When procedures have been revised

- When new information about a process becomes available
- When an employee's performance needs improvement
- When loss analysis reveals trends contributing to injuries or claims

Although training will not solve all problems, it will prove useful in the prevention of accidents. Documentation is important in order to prove that training has occurred. All training shall be recorded in each employee's employment file, each Board member's record file, in the recorded minutes of meetings, or in employee logging reports.

## **L. Annual Risk Management Report**

In consultation with the Administrative Planning Team, the Executive Director shall periodically review all areas of this Risk Management Plan, identify progress with previous Action Plan items, identify actual losses over the course of time, identify potential loss exposures within all areas, and proposed revised Action Plan items to prevent or reduce actual or potential losses.

## **PART II: ACTION PLAN**

The following are specific operations and procedures of the Board that may contain areas of potential loss for CCDDR and ways to mitigate such exposures. These areas shall be reviewed periodically by the Executive Director and Board of Directors.

### Governance Structure

#### *Bylaws/Policies*

The current bylaws were originally approved by the CCDDR Board of Directors on September 18, 2006. The CCDDR Executive Director performs an annual review of the bylaws and policies/procedures to determine the need for any revisions, and if necessary, recommends any such changes to the CCDDR Board of Directors for their review/approval. Ideally, the bylaws and policies/procedures should be reviewed by legal counsel to ensure compliance with federal, state and local laws. Every member of the board receives a current copy of the bylaws and policies/procedures when they join the board and whenever the bylaws are amended.

The original bylaws and all policies/procedures as approved by the Board and any amendments are stored at the CCDDR TCM office at 100 Third St. in Camdenton MO and Administrative Office at 5816 Osage Beach Parkway, Suite 106, Osage Beach MO.

#### *Conflict of Interest Policy*

The conflict of interest policy was originally adopted by the board on June 19, 2006. An annual Conflict of Interest Statement was also adopted by the board in November 2008. Every year each board member completes and signs a disclosure statement declaring

any known conflicts and agreeing to comply with the policy. These annual statements are gathered each calendar year.

### *Board Member Policy Handbook*

A board member policy handbook was developed in 2009. This handbook is supplemented by a compilation of all agency policies/procedures, agency bylaws, and requirements of the board of directors, and is given to all new board members and as changes are made.

### *Board Orientation*

CCDDR provides orientation material to all new board members, including the following documents:

- Policy/Procedure Handbook
- Bylaws
- New Board Member Job Description
- Current Year Agency Budget
- List of Other Board Members
- Current Strategic Plan
- Copy of MO Sunshine Law
- Mission Statement
- Brief History Of CCDDR
- Description of Agency Operations
- Financial Information
- Board Committees

### *Board Development*

The board of CCDDR strives to enhance the ability of its members to govern the organization by providing training for board members. Periodically the board will assess the educational needs of the members and offer training, support or assistance as needed.

### *Board Self-Assessment*

To become a more effective board, the board members of Camden Co. Developmental Disability Resources will conduct a board self-assessment at least annually. The board will use the self-assessment as a tool to improve its performance and energize the organization to achieve its mission.

### *Board Recruitment and Nomination*

CCDDR strives to have a diverse and qualified board with people who bring the skills, qualities, and expertise needed to lead and govern the organization in accomplishing its mission.

#### *Board Minutes*

CCDDR recognizes the importance of the board meeting minutes and each board member is aware of his/her responsibility for ensuring the accuracy of the minutes. The minutes are maintained in a safe location to preserve their integrity.

#### Risk Financing Strategy

To safeguard the assets and resources of CCDDR, the organization will purchase insurance for those insurable risks of major importance to mission-critical operations and the financial health of the organization. It is the Executive Director's responsibility to oversee the organization's insurance program and provide insurance reports to the board.

#### Human Resources Policies

##### *Written Employment Policies*

CCDDR believes that written employment policies are an essential risk management tool. The organization has compiled its key employment policies in a document titled the Employee Manual.

##### *Communicating Policy Changes*

All new policies are communicated in writing to staff through the use of memos and other appropriate policy documents. In addition, new policies are incorporated in the policy manual when that manual is updated periodically. CCDDR reviews and, if necessary, updates its Employee Manual periodically in order to insure that policies remain suitable for the organization and are in compliance with state and federal laws.

##### *Use of Position/Job Descriptions*

CCDDR uses job descriptions for both paid and volunteer positions in the organization. These documents are developed by supervisory personnel and updated on an as needed basis.

##### *Employee Orientation*

The Compliance Manager and immediate supervisor are responsible for designing and conducting appropriate orientations for new employees. Basic orientation must take place within the first week of employment. A typical orientation includes review of key policies, introduction to software programs and hardware programs that will be used by the employee, introduction to other staff and key volunteers, and a review of the supervisor's expectations and reporting requirements. A checklist of new employee training and/or orientation topics shall be maintained and kept within the employment files.

### *Staff Supervision*

CCDDR views effective staff supervision as an essential component of risk management. The need for additional supervisory staff in addition to the Executive Director shall be evaluated periodically to ensure that the agency is able to effectively accomplish its mission and objectives. Supervisory staff shall be expected to communicate their expectations of direct reports clearly and consistently and hold employees accountable with regard to key tasks and responsibility and compliance with the organization's employment policies. All employees are encouraged to raise concerns or questions about work priorities and assignments with their direct supervisor.

### *Performance Appraisal Process*

The Executive Director will conduct performance reviews and planning sessions at the end of the 90-day probationary period for new managers, and thereafter on a periodic basis. The appropriate manager or supervisor shall conduct performance reviews and planning sessions at the end of the 90-day probationary period for new employees, and thereafter on a periodic basis. A goal setting exercise is part of this process.

### *Client Safety*

Clients served by CCDDR shall be provided with a copy of Client Rights at the time of initial contact/service delivery, as well as methods in which to report abuse and neglect. CCDDR Support Coordination staff shall monitor the on-going health and safety of consumers served in accordance with Division of MR/DD guidelines. This includes the Service Monitoring function, review of Event Reports, and other quality assurance processes.

### *Reference Checks*

CCDDR's screening process includes checking references for finalists for paid and volunteer positions.

### *Criminal History Background Checks/Initial Drug Screen*

It is the policy of CCDDR to conduct criminal history background checks and an initial drug screen on all applicants for employment positions.

### *Emergency Procedures*

To ensure the safety of all staff and clients, CCDDR has established an Emergency Action Plan, which is contained within the Health & Safety Manual, which is a separate document from this Plan. The Emergency Action Plan is a way for CCDDR to prepare and plan for various emergencies. All personnel are responsible for knowing and following the Health & Safety Plan in the event of an emergency.

### Financial Management/Board Revenues

The Financial Management practices of the board are outlined in the board's policies and procedures. Appropriate internal controls, cash management systems, and financial accounting systems shall be utilized to protect the assets of the board and reduce the likelihood of waste and/or fraud of board resources.

### *Budgeting Process*

The budgeting process utilized by the board is outlined in the board's policies and procedures. The proposed annual budget document submitted by the Executive Director shall be developed in consultation with the Budget Appropriations Committee and the Administrative Planning Team. The proposed annual budget shall be accompanied by a budget summary containing key changes from last year's budget, revenue and expense justifications, etc. The approved budget document shall coincide with the board's priorities as contained in its Strategic Plan.

### *Financial Statements*

Unaudited financial statements are produced monthly by the Executive Director. The financial statements shall contain a monthly balance sheet, cash flow statement, budgeted vs. actual income/expense statement for the month and year to date, and a check detail for the reported month.

### *Audit*

Per policies/procedures, the board obtains an annual independent audit from a licensed Certified Public Accountant with experience in auditing political subdivisions of the State of MO.

### *Investment Policy*

Reserve funds of the board that are controlled by the board shall be invested in accordance with the board's Investment Policy. The Executive Director in conjunction with the Administrative Planning Team and the Budget Appropriations Committee of the board shall monitor the investment of all board funds. The board shall obtain quotes per policies/procedures on current interest rates from local banks for all proposed investment tools from local/area banking institutions.

### *Board Revenues*

Currently, CCDDR procures most of its revenues through a county-wide tax levy. CCDDR pays for the Support Coordination program through Medicaid TCM billings.

### Fundraising and Public Relations Risks

#### *Gift Acceptance Policy*

CCDDR may occasionally solicit and accept gifts for purposes that will help the organization further and fulfill its mission. Policies/procedures govern acceptance of gifts made to CCDDR for the benefit of any of its operations, programs, or services. CCDDR will seek the advice of legal counsel in matters relating to acceptance of gifts when appropriate. Review by counsel is recommended for:

- Gifts of securities that are subject to restrictions or buy-sell agreements
- Documents naming CCDDR as trustee or requiring CCDDR to act in any fiduciary capacity
- Gifts requiring CCDDR to assume financial or other obligations
- Transactions with potential conflicts of interest
- Gifts of property which may be subject to environmental or other regulatory restrictions

CCDDR urges all prospective donors to seek the assistance of personal legal and financial advisors in matters relating to their gifts, including the resulting tax and estate planning consequences.

Gifts generally accepted without review are:

- Cash - Cash gifts are acceptable in any form, including by check, money order, or credit card; however, donors wishing to make a gift by credit card must provide the card type (e.g., Visa, MasterCard, American Express), card number, expiration date, and name of the card holder as it appears on the credit card
- Marketable Securities – Marketable securities may be transferred electronically to an account maintained at one or more brokerage firms or delivered physically with the transferor's endorsement or signed stock power (with appropriate signature guarantees) attached; all marketable securities will be sold promptly upon receipt unless otherwise directed by CCDDR's Board of Directors; and, in some cases, marketable securities may be restricted (for example, by applicable

securities laws or the terms of the proposed gift – in such instances, the decision whether to accept the restricted securities shall be made by the Board of Directors)

- Bequests and Beneficiary Designations under Revocable Trusts, Life Insurance Policies, Commercial Annuities and Retirement Plans – Donors are encouraged to make bequests to CCDDR under their wills, and to name CCDDR as the beneficiary under trusts, life insurance policies, commercial annuities and retirement plans
- Charitable Remainder Trusts – CCDDR will accept designation as a remainder beneficiary of charitable remainder trusts
- Charitable Lead Trusts – CCDDR will accept designation as an income beneficiary of charitable lead trusts.

Gifts accepted subject to prior review are:

- Tangible Personal Property – the Board of Directors shall review whether to accept any gifts of tangible personal property in light of the following considerations:
  - ✓ Does the property further the organization's mission?
  - ✓ Is the property marketable?
  - ✓ Are there any unacceptable restrictions imposed on the property?
  - ✓ Are there any carrying costs for the property for which the organization may be responsible?
  - ✓ Is the title/provenance of the property clear?
- Life Insurance – CCDDR will accept gifts of life insurance where CCDDR is named as both beneficiary and irrevocable owner of the insurance policy; however, the donor must agree to pay, before due, any future premium payments owing on the policy
- Real Estate – All gifts of real estate are subject to review by the Board of Directors; henceforth, prior to acceptance of any gift of real estate other than a personal residence, CCDDR shall require an initial environmental review by a qualified environmental firm; in the event the initial review reveals a potential problem, the organization may retain a qualified environmental firm to conduct an environmental audit; and criteria for acceptance of gifts of real estate include:
  - ✓ Is the property useful for the organization's purposes?
  - ✓ Is the property readily marketable?
  - ✓ Are there covenants, conditions, restrictions, reservations, easements, encumbrances or other limitations associated with the property?
  - ✓ Are there carrying costs (including insurance, property taxes, mortgages, notes, or the like) or maintenance expenses associated with the property?
  - ✓ Does the environmental review or audit reflect that the property is damaged or otherwise requires remediation?
- Miscellaneous – Gifts that would result in CCDDR violating its statutory authority; are too difficult or too expensive to administer in relation to their value; result in any unacceptable consequences for CCDDR; or are for purposes outside CCDDR's mission (decisions on the restrictive nature of a gift, and its acceptance

or refusal, shall be made by the Board of Directors, in consultation with the Executive Director and, if appropriate, legal counsel)

### *Monitoring Restricted Gifts Policy*

CCDDR will fulfill a donor's specified gift intent to the extent that doing so is legal, consistent with the organization's statutory authority, and capable of being performed. CCDDR will discourage donors from imposing investment and transferability restrictions on assets given to the organization. However, once donations with such restrictions have been accepted, the organization will comply with such restrictions.

### *Policy Concerning the Use of Solicitors*

The Executive Director shall approve any proposed solicitation plan. The plan must indicate the targeted groups or audience that will be solicited, the literature that will be used to support the effort, the timeframe for the campaign, and the names of the persons who will be soliciting on the organization's behalf.

FUNDRAISING & PUBLIC RELATIONS NEEDS: No current needs.

### Facility Needs

CCDDR seeks to utilize its resources and assets fully in achieving its mission. The prudent use of facilities and resources is required to protect the safety and well-being of all personnel—including staff, volunteers and service recipients—while safeguarding the organization's financial assets. External and internal facility inspections shall be conducted in accordance with the policies and procedures set forth in CCDDR's Health & Safety Manual.

### *Preventative Maintenance*

Facility preventative maintenance shall be performed in accordance with the policies and procedures set forth in CCDDR's Health & Safety Manual. The Compliance Manager is responsible for monitoring compliance with the preventative maintenance schedule and regular self-inspections and external compliance inspections of the CCDDR facility.

### *Storage of Sensitive Documents*

There are certain agency documents which require safe and secure storage. This would include bank statements, insurance documents, payroll information, client records, etc. Storage issues revolve around both hard-copy documents as well as storage of electronic information. Consumer records are stored electronically and in a locked storage area with sprinklers onsite and offsite. All CCDDR file cabinets have locks. CCDDR also backs up electronic data from the agency server on a daily basis. A safe

deposit box was obtained in 2008 at First National Bank for the additional storage of sensitive documents.

### *Policy Concerning Invitees*

CCDDR recognizes its duty of care as a property owner to maintain the organization's premises in a reasonably safe condition for outside guests, to look for unsafe or dangerous conditions on the premises, and either remedy the problems or issue an appropriate warning.

### *Using Others' Facilities Policy*

CCDDR will only use others' facilities for special events, or in an emergency up to and until its facilities are inhabitable once again. The organization will be certain to:

- Have a written agreement signed by representatives of all parties that spells out the organization's requirements, expectations and responsibilities with regard to the space; this may be a mutual aid agreement in the event of an emergency situation
- Fulfill its obligations as spelled out in the agreement and leave the site as tidy as it was found
- Supervise its employees, volunteers and service recipients when they use the facility
- Refrain from serving alcoholic beverages in facilities being used in the name of the organization
- Obtain and review appropriate insurance coverage to cover injury, illness and property damage

### *Policy Regarding the Use of Others' Homes or Apartments*

CCDDR recognizes that many accidents occur when organizations have good intentions but poor planning. It will only accept the generous offer of the use of a private home or rental apartment for its purposes when:

- Staff has ascertained that a public facility cannot be obtained to accommodate agency needs (purpose, budget, dates, times, etc.)
- The property owner has insurance to cover injury or accidents to visitors to the residence or is willing to obtain such coverage
- Parents or guardians of any clients served sign a waiver that is specific about any dangers associated with the use of the home (e.g. use of a swimming pool, riding horses on a ranch or farm)
- The apartment, condominium complex or home owners association has adequate insurance to cover injuries to guests (slips and trips in the lobby, elevator malfunction, use of the exercise room or pool)

## Technology and Information Management

CCDDR has adopted a Technology Plan that details agency policies and procedures with regard to office technology systems. This is a separate document from this plan; however, the plan documents specific risk-mitigation strategies pertaining to office technology systems. The agency's technology needs are outlined in this separate document.

### Vehicle Use

Providing transportation services to clients served is potential function of the agency's Support Coordination program. The agency has a Vehicle Use policy that is outlined in the Health & Safety Manual.