### **Medical Solutions**

### CALIFORNIA WORKPLACE VIOLENCE PREVENTION PLAN FOR CLINICIANS

Medical Solutions, LLC and affiliates (or collectively, "Medical Solutions" the "Company") implements this Workplace Violence Prevention Plan ("WVPP" or the "plan") to address the hazards known to be associated with the four types of workplace violence in healthcare settings as set forth in California Labor Code § 3342 and defined below. This policy applies to all Medical Solutions clinical employees working in home health care, general acute care hospitals, acute psychiatric hospitals, special hospitals, and any other health facilities, as defined below, located in California.

WVPP Implementation Date: 7/01/2024

### **DEFINITIONS**

Acute psychiatric hospital (APH) -- A hospital, licensed by the California Department of Public Health as such meeting the definition provided in Health and Safety Code Section 1250(b) or California Code of Regulations, Title 22, Section 71005; and all services within the hospital's license.

**Alarm** -- A mechanical, electrical or electronic device that does not rely upon an employee's vocalization in order to alert others.

*Chief* -- The Chief of the Division of Occupational Safety and Health of the Department of Industrial Relations, or his or her designated representative.

**Dangerous weapon** -- An instrument capable of inflicting death or serious bodily injury.

**Division** -- The Division of Occupational Safety and Health of the Department of Industrial Relations.

**Emergency** -- Unanticipated circumstances that can be life-threatening or pose a risk of significant injuries to the patient, staff or public, requiring immediate action.

*Emergency medical services* -- Medical care provided pursuant to Title 22, Division 9, by employees who are certified EMT-1, certified EMT-II, or licensed paramedic personnel to the sick and injured at the scene of an emergency, during transport, or during inter-facility transfer.

Engineering controls -- An aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the worker and the hazard. For purposes of reducing workplace violence hazards, engineering controls include, as applicable, but are not limited to: electronic access controls to employee occupied areas; weapon detectors (installed or handheld); enclosed workstations with shatter-resistant glass; deep service counters; separate rooms or areas for high risk patients; locks on doors; furniture affixed to the floor; opaque glass in patient rooms (protects privacy, but allows the health care provider to see where the patient is before entering the room); closed-circuit television monitoring and video recording; sight-aids; and personal alarm devices.

**Environmental risk factors** -- Factors in the facility or area in which health care services or operations are conducted that may contribute to the likelihood or severity of a workplace violence incident. Environmental

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risk factors include risk factors associated with the specific task being performed, such as the collection of money.

General acute care hospital (GACH) -- A hospital, licensed by the California Department of Public Health as such meeting the definition provided in Health and Safety Code Section 1250(a) or California Code of Regulations, Title 22, Section 70005, and all services within the hospital's license.

*Health facility* -- Any facility, place, or building that is organized, maintained, and operated for the diagnosis, care, prevention, or treatment of human illness, physical or mental, including convalescence and rehabilitation and including care during and after pregnancy, or for any one or more of these purposes, for one or more persons, to which the persons are admitted for a 24-hour stay or longer. (Ref: Health and Safety Code Section 1250). For the purposes of this section, a health facility includes hospital based outpatient clinics (HBOCs) and other operations located at a health facility, and all off-site operations included within the license of the health facility. The term "health facility" includes facilities with the following bed classifications, as established by the California Department of Public Health:

- (1) General acute care hospital
- (2) Acute psychiatric hospital
- (3) Skilled nursing facility
- (4) Intermediate care facility
- (5) Intermediate care facility/developmentally disabled habilitative
- (6) Special hospital
- (7) Intermediate care facility/developmentally disabled
- (8) Intermediate care facility/developmentally disabled-nursing
- (9) Congregate living health facility
- (10) Correctional treatment center
- (11) Nursing facility
- (12) Intermediate care facility/developmentally disabled-continuous nursing (ICF/DD-CN)
- (13) Hospice facility

**Patient classification system** -- A method for establishing staffing requirements by unit, patient, and shift based on the assessment of individual patients by the registered nurse as specified in Title 22, Sections 70053.2 and 70217, for General Acute Care Hospitals.

**Patient contact** -- Providing a patient with treatment, observation, comfort, direct assistance, bedside evaluations, office evaluations, and any other action that involves or allows direct physical contact with the patient.

**Patient specific risk factors** -- Factors specific to a patient that may increase the likelihood or severity of a workplace violence incident, such as use of drugs or alcohol, psychiatric condition or diagnosis associated with increased risk of violence, any condition or disease process that would cause confusion and/or disorientation, or history of violence.

*Threat of violence* -- A statement or conduct that causes a person to fear for his or her safety because there is a reasonable possibility the person might be physically injured, and that serves no legitimate purpose.

Work practice controls -- Procedures, rules and staffing which are used to effectively reduce workplace violence

hazards. Work practice controls include, as applicable, but are not limited to: appropriate staffing levels; provision of dedicated safety personnel (i.e. security guards); employee training on workplace violence prevention methods; and employee training on procedures to follow in the event of a workplace violence incident.

**Workplace violence** -- Any act of violence or threat of violence that occurs at the work site. The term workplace violence shall not include lawful acts of self-defense or defense of others. Workplace violence includes the following:

- (A) The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury;
- (B) An incident involving the threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury;
- (C) Four workplace violence types:
  - 1. **Type 1 violence** -- Workplace violence committed by a person who has no legitimate business at the work site, and includes violent acts by anyone who enters the workplace with the intent to commit a crime.
  - 2. **Type 2 violence** -- Workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors or other individuals accompanying a patient.
  - 3. *Type 3 violence* -- Workplace violence against an employee by a present or former employee, supervisor, or manager.
  - 4. *Type 4 violence* -- Workplace violence committed in the workplace by someone who does not work there, but has or is known to have had a personal relationship with an employee.

### RESPONSIBILITY

Clare Courtemanche - Corporate Safety Specialist] ("WVPP Administrator"), has the authority and overall responsibility for implementing the provisions of this WVPP. Other individuals also have responsibility for this WVPP, as set forth below, including their individual responsibilities under the plan.

Responsible	Job	WVPP Responsibility(ies)	Phone #	Email
Persons	Title/Position			
Clare	Corporate	Overall responsibility for the	402-781-	Safety@medicalsolutions.com
Courtemanche	Safety	plan; approves the final	5109	
	Specialist	plan; conducts reviews of		
	_	the plan; and implements		
		any changes to the plan.		
Clare	Corporate	Responsible for employee	402-781-	Safety@medicalsolutions.com
Courtemanche	Safety	involvement and training;	5109	
	Specialist	organizes and conducts		

Clare		training meetings, creates and updates training materials, and handles any reports of workplace violence; conducts investigations regarding same; and is responsible for maintaining the Violent Incident Log.  Responsible for emergency	402-781-	Safety@medicalsolutions.com
Courtemanche	Corporate Safety Specialist	responsible for emergency response, hazard identification, and coordination with other employers; conducts safety inspections, coordinates emergency response procedures, and communicates with other employers about the plan.	5109	Safety@medicalsolutions.com

All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas and for answering employee questions about the WVPP.

### EMPLOYEE ACTIVE INVOLVEMENT

Medical Solutions adopts the following policies and procedures to ensure the active involvement of employees and authorized employee representatives in developing and implementing the plan:

- Management will work with and allow employees to participate in:
  - O Identifying, evaluating, and determining corrective measures to prevent workplace violence hazards. Specifically, during the initial training meeting and in subsequent training sessions and other staff meetings, employees will have the opportunity to discuss the identification of workplace violence related concerns/hazards, evaluate those hazards and/or concerns, and how to correct them. These meetings could involve brainstorming sessions, discussions of recent incidents, and reviews of safety procedures. Employees may also bring any concerns, suggestions, or other communication regarding workplace violence to the attention of management at any time following the Company's Open Door Policy set forth in the Employee Handbook.
  - Employees are encouraged to participate in developing, implementing, and reviewing this Plan and training programs for same, and their suggestions are incorporated into the Plan and training materials. For example, an employee might suggest a new training scenario based on a recent incident.
  - Employees are encouraged to report workplace violence incidents and to participate in the investigation of workplace violence incidents by providing truthful information during any investigation.

- Management will ensure that all workplace violence policies and procedures within this Plan are clearly communicated and understood by all employees. Managers and supervisors will enforce the rules fairly and uniformly.
- All employees will follow all workplace violence prevention plan directives, policies, and procedures, contained in this plan and the Employee Handbook, and assist in maintaining a safe work environment.
- The plan shall be in effect at all times and in all work areas and be specific to the hazards and corrective measures for each work area and operation.

### MANAGEMENT AND EMPLOYEE COMPLIANCE

Our system to ensure that all employees, including members of management, comply with the rules and work practices that are designed to make the workplace more secure, and do not engage in threats or physical actions which create a security hazard for others in the workplace, include at a minimum:

- Training employees, supervisors, and managers in the provisions of this WVPP.
- Effective procedures to ensure that supervisory and nonsupervisory employees comply with the WVPP, including those in the Unsatisfactory Performance Policy and Termination Policy set forth in the Employee Handbook.
- Provide retraining to employees whose safety performance is deficient with the WVPP.
- Recognizing employees who demonstrate safe work practices that promote the WVPP in the workplace by email.
- Discipline employees for failure to comply with the WVPP. (See Unsatisfactory Performance and Termination Policies.)

### COMMUNICATION WITH EMPLOYEES

We recognize that open, two-way communication between our management team, staff, and other employers, about workplace violence issues is essential to a safe and productive workplace. The following communication system is designed to facilitate a continuous flow of workplace violence prevention information between management and staff in a form that is readily understandable by all employees, and consists of the following:

- New employee orientation including workplace violence prevention policies and procedures.
- Workplace violence prevention training programs.
- Effective communication between employees and supervisors about workplace violence prevention and violence concerns. Communications regarding workplace violence will be made in the employees' first language.
- Posted or distributed workplace violence prevention information, including this WVPP.
- Employees will document and communicate to other employees and between shifts and units, information regarding conditions that may increase the potential for workplace violence incidents by email, text or as specifically required by the client facility at which they are assigned.
- Employees can report a violent incident, threat, or other workplace violence concern, to Medical Solutions

or law enforcement without fear of reprisal or adverse action:

- loyees can anonymously report a violent incident, threat, or other violence-related concerns by going to the applicable website, outlined below.
  - Medical Solutions clinicians should go to the Medical Solutions website and click on "Clinician Workplace Violence Reporting" at the bottom of the page.
  - Aureus Nursing clinicians should go to the Aureus web site and click on "Clinician Workplace Violence Reporting" at the bottom of the page.
- Host clinicians should click on the following link: <a href="https://www.hosthealthcare.com/traveler-resources/">https://www.hosthealthcare.com/traveler-resources/</a> and select "Submit an Incident Report" near the bottom of the page. Employees may dial 911 to contact law enforcement.
- Employees will not be prevented from accessing their mobile or other communication devices to seek emergency assistance, assess the safety of a situation, or communicate with a person to verify their safety.
- Employees' concerns will be investigated in a timely manner and employees will be informed of the results of the investigation and any corrective actions to be taken. Updates on the status of investigations and corrective actions are provided to employees through email and/or at staff meetings or training sessions. These updates could include information about the progress of investigations, the results of investigations, and any corrective actions taken.

### COORDINATION WITH OTHER EMPLOYERS

Medical Solutions will implement the following effective procedures to coordinate implementation of its plan with other employers to ensure that those employers and employees understand their respective roles, as provided in the plan.

- All clinical employees will be trained on workplace violence prevention under this Plan.
- Medical Solutions clinical employees will receive worksite specific training from the client facility at which they are assigned to work.
- Workplace violence incidents involving any employee are reported, investigated, and recorded.
- At a multiemployer worksite, Medical Solutions will ensure that if its employees experience workplace violence incident that the worksite employer will record the information in a Violent Incident Log and shall also provide a copy of that log to controlling employer.

### WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

Medical Solutions will implement the following effective procedures to ensure that:

- All threats or acts of workplace violence, regardless of the type of violence, and any workplace violence concerns or incidents, are to be reported to an employee's supervisor or manager, who will inform the WVPP Administrator. This will be accomplished by the supervisor contacting the WVPP Administrator via phone or email, whichever method is most expedient at the time. If that's not possible, employees will report incidents directly to the WVPP Administrator, Clare Courtemanche 402-781-5109 Safety@medicalsolutions.com. All such reports by employees are done without fear of reprisal.
- Employees can report threats or actions of workplace violence, regardless of the type of violence, and workplace violence concerns or incidents to their supervisor, HR, or through an anonymous website

- without fear of reprisal. To contact website, go to the Medical Solutions or Aureus Nursing web site on the bottom of the page and clicking on "Clinician Workplace Violence Reporting" and Host website <a href="https://www.hosthealthcare.com/traveler-resources/">https://www.hosthealthcare.com/traveler-resources/</a>
- Employees may also report any threats or acts of workplace violence to law enforcement regardless of the shift the employee works.
- In accordance with any policies or procedures of the facility at which an employee is assigned, employees will document and communicate to other employees and between shifts and units, information regarding conditions that may increase the potential for workplace violence incidents.

A strict non-retaliation policy is in place, and any instances of retaliation are dealt with swiftly and decisively. Indeed, Medical Solutions prohibits retaliation against employees who, in good faith, make suggestions, raise concerns, or make any reports of workplace violence. Employees shall be allowed to seek assistance and intervention from local emergency services or law enforcement when a violent incident occurs and Medical Solutions prohibits actions that disallow an employee from or are punitive or retaliatory against an employee for seeking such assistance and intervention. Employees who violate this non-retaliation policy will be subject to discipline, up to and including, termination from employment.

### EMERGENCY RESPONSE PROCEDURES

Medical Solutions has in place the following specific measures to handle actual or potential workplace violence emergencies:

- To alert employees of the presence, location, and nature of workplace violence emergencies, Medical Solutions has the following: emails, group text-messages/alerts will be used to alert employees of emergencies. Additionally, the client facility at which an employee is assigned to work may also have methods for alerting employees and employees assigned to work at such facilities should follow the directions provided to them by the client facility.
- Medical Solutions has an evacuation and sheltering plan for its offices. *See also*, any client facility evacuation and sheltering plans for the facility at which you are assigned to work.
- To obtain help from Medical Solutions' staff or law enforcement, employees should refer to the Emergency Contacts List below or dial 9-1-1 to contact law enforcement. *See also*, any client facility emergency contact lists for the facility at which you are assigned to work, including but not limited to, any contact information for security personnel.
- In the event of an emergency, including a Workplace Violence Emergency, contact 9-1-1 or client facility security personnel as applicable/appropriate. After calling 911, the employee should immediately report the emergency internally. Additionally, if an employee believes a situation could evolve into an emergency, they should report it internally as well. To report an emergency internally, employees should immediately:
  - Contact Clare Courtemanche 402-781-5109 Safety@medicalsolutions.com. The emergency telephone numbers for these individuals are listed below and are posted on the employee intranet.
  - Contact your supervisor at the client facility at which you are assigned to work.

# ASSESSMENT PROCEDURES TO IDENTIFY AND EVALUATE ENVIRONMENTAL RISK FACTORS, INCLUDING COMMUNITY-BASED RISK FACTORS.

- Medical Solutions will review all workplace violence incidents that occurred within the previous year whether or not an injury occurred.
- For employees who are assigned to work at fixed workplaces, such a hospital or other healthcare facility, there may be environmental risk factors present at your work location for workplace violence. Review your assigned location at the client facility for the following, and notify Clare Courtemanche Corporate Safety Specialist 402-781-5109 Safety@medicalsolutions.com at Medical Solutions (or you can make an anonymous report using our anonymous reporting procedure listed under Workplace Violence Incident Reporting Procedure above) of any these environmental risk factors present at your location and for which you have any safety concerns:
  - 1. Are you working in an isolated location from other employees, been assigned to work alone or in a remote location, during night or early morning hours, or assigned to work where an assailant could prevent entry into the work area by responders or other employees?
  - 2. Is there poor illumination where possible assailants may be present?
  - 3. Is there blocked visibility where possible assailants may be present?
  - 4. Are there physical barriers between employees and persons at risk of committing workplace violence?
  - 5. Are there effective escape routes?
  - 6. Are there obstacles or impediments to accessing alarm systems?
  - 7. Are there locations within the facility where you are assigned to work where alarm systems are not operational?
  - 8. Are there entryways where unauthorized entrance may occur, such as doors designated for staff entrance or emergency exits?
  - 9. Are there furnishings or other objects that can be used in areas where patient contact activities are performed?
  - 10. Are there high-value items present, such as money or pharmaceuticals?
  - 11. What, if any, work activities make you feel unprepared to respond to a violent action?
  - 12. What daily activities, if any, expose you to the greatest risk of violence?
  - 13. Any unsafe conditions or work practices not identified above?
  - For employees who are assigned to work at a home health care location, review during intake procedures, at the time of the initial visit, and during subsequent visits whenever there is a change in conditions the following environmental risk factors and notify Clare Courtemanche Corporate Safety Specialist 402-781-5109 Safety@medicalsolutions.com at Medical Solutions (or you can make an anonymous report using our anonymous reporting procedure listed under Workplace

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Violence Incident Reporting Procedure above) if any of the following are present at your location:

- 1. Are there weapons in the home?
- 2. Is there evidence of substance abuse?
- 3. Are there uncooperative cohabitants?
- 4. What, if any, work activities make you feel unprepared to respond to a violent action?
- 5. What daily activities, if any, expose you to the greatest risk of violence?
- 6. Any unsafe conditions and/or work practices not identified above?
- Employees will assess, as applicable to their work assignments, and report any concerns to Clare Courtemanche Corporate Safety Specialist 402-781-5109 Safety@medicalsolutions.com at Medical Solutions (or you can make an anonymous report using our anonymous reporting procedure listed under Workplace Violence Incident Reporting Procedure above), regarding the following environmental risk factors to identify situations in which patient-specific Type 2 violence is more likely to occur and to assess visitors or other persons who display disruptive behavior or otherwise demonstrate a risk of committing workplace violence:
  - (A) A patient's mental status and conditions that may cause the patient to be non-responsive to instruction or to behave unpredictably, disruptively, uncooperatively, or aggressively;
  - (B) A patient's treatment and medication status, type, and dosage, as is known to the health facility and employees;
  - (C) A patient's history of violence, as is known to the health facility and employees;
  - (D) Any disruptive or threatening behavior displayed by a patient.

### WORKPLACE VIOLENCE HAZARD CORRECTION

- For employees who are assigned to work in a client facility or work location that is not controlled by Medical Solutions, the Company shall work with the client facility for it to take measures to protect employees from imminent hazards immediately, and shall take measures to protect employees from identified serious hazards within seven days of the discovery of the hazard, where there is a realistic possibility that death or serious physical harm could result from the hazard. When an identified corrective measure cannot be implemented within this timeframe, the Company shall work with the client facility to take interim measures to abate the imminent or serious nature of the hazard while the client facility is completing the permanent control measures that are required by Labor Code § 3342.
- All corrective actions taken will be documented and dated.

### PROCEDURES FOR POST INCIDENT RESPONSE AND INVESTIGATION

Employees who have been injured in an incident will be provided with immediate medical care or first aid.

After a workplace incident, the WVPP Administrator or their designee will implement the following post-incident procedures:

- Visit the scene of an incident as soon as safe and practicable.
- Identify all employees involved in the incident.
- Interview and conduct a post-incident debriefing as soon as possible after the incident with involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
- Review security footage of existing security cameras, if applicable.
- Review any patient-specific risk factors and any risk reduction measures that were specified for that patient, if applicable and available;
- Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
- Determine the cause(s) of the incident.
- Take corrective action to prevent similar incidents from occurring.
- Record the findings and ensure corrective action is taken.
- Obtain any reports completed by law enforcement.
- Use the Violent Incident Log for every workplace violence incident and record therein, information including:
  - o The date, time, and location of the incident.
  - o The workplace violence type or types involved in the incident.
  - A detailed description of the incident.
  - A classification of who committed the violence, including whether the perpetrator was a client or customer, family or friend of a client or customer, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or other perpetrator.
  - A classification of circumstances at the time of the incident, including, but not limited to, whether the employee was completing usual job duties, working in poorly lit areas, rushed, working during a low staffing level, isolated or alone, unable to get help or assistance, working in a community setting, or working in an unfamiliar or new location.
  - A classification of where the incident occurred, such as in the workplace, parking lot or other area outside the workplace, or other area.
  - o The type of incident, including, but not limited to, whether it involved any of the following:
    - Physical attack without a weapon, including, but not limited to, biting, choking, grabbing, hair pulling, kicking, punching, slapping, pushing, pulling, scratching, or spitting.

- Attack with a weapon or object, including, but not limited to, a firearm, knife, or other object.
- Threat of physical force or threat of the use of a weapon or other object.
- Sexual assault or threat, including, but not limited to, rape, attempted rape, physical display, or unwanted verbal or physical sexual contact.
- Animal attack.
- Other.
- o Consequences of the incident, including, but not limited to:
  - Whether security or law enforcement was contacted and their response.
  - Actions taken to protect employees from a continuing threat or from any other hazards identified as a result of the incident.
  - Information about the person completing the log, including their name, job title, and the date completed.
- Reviewing all previous incidents.
- Referral to the Company-sponsored Employee Assistance Program, for individual trauma counseling to all employees affected by the incident.
- Inform employees of the results of the investigation and any corrective actions to be taken.

No personal identifying information is recorded or documented in the violence incident log. This includes information which would reveal identification of any person involved in a violent incident, such as the person's name, address, electronic mail address, telephone number, social security number, or other information that, alone or in combination with other publicly available information, reveals the person's identity.

### TRAINING AND INSTRUCTION

All employees, including managers and supervisors, will have training and instruction on general and job-specific workplace violence practices. The training materials provided will be appropriate in content and vocabulary to the educational level, literacy, and language of employees. Training and instruction will be provided as follows:

- When the WVPP is first established.
- Annually to ensure all employees understand and comply with the plan.
- Whenever an employee is newly hired or newly assigned to perform duties for which the training required was not previously provided
- Whenever new equipment or work practices are introduced or when a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the plan. The additional training may be limited to addressing the new equipment, practice, workplace violence hazard or changes to

the plan.

The training will include instruction on the definitions found on pages 1-3 of this plan and the requirements listed below:

- An explanation of this WVPP, including the employer's hazard identification and evaluation procedures, general and personal safety measures the employer has implemented, how the employee may communicate concerns about workplace violence without fear of reprisal, how the employer will address workplace violence incidents, and how the employee can participate in reviewing and revising the Plan.
- How to recognize the potential for violence, factors contributing to the escalation of violence and how to counteract them, and when and how to seek assistance to prevent or respond to violence
- Strategies to avoid physical harm.
- Workplace violence risks employees are reasonably anticipated to encounter in their jobs, corrective
  measures Medical Solutions has implemented, how to seek assistance to prevent or respond to violence, and
  strategies to avoid physical harm.
- The Violent Incident Log and how to obtain copies of records pertaining to hazard identification, evaluation and correction, training records, and violent incident logs.
- How to recognize alerts, alarms, or other warnings about emergency conditions such as mass casualty threats and how to use identified escape routes or locations for sheltering, as applicable.
- The role of private security personnel, if any.
- How to report violent incidents to law enforcement.
- Any resources available to employees for coping with incidents of violence, including, but not limited to, critical incident stress debriefing or employee assistance programs.

During the training, employees will also be provided with an opportunity for interactive questions and answers with a person knowledgeable about the plan.

- o In addition to the training listed above, employees performing patient contact activities and those employees' supervisors shall be provided refresher training at least annually, applicable to those employees, to review the topics included in the initial training and the results of the Review and Revision of the WVPP. Refresher training shall include an opportunity for interactive questions and answers with a person knowledgeable about the employer's workplace violence prevention plan.
- In addition to the training listed above, employees assigned to respond to alarms or other notifications of violent incidents or whose assignments involve confronting or controlling persons exhibiting aggressive or violent behavior shall be provided training on the following topics prior to initial assignment and at least annually thereafter. This additional training shall include: (A) General and personal safety measures; (B) Aggression and violence predicting factors; (C) The assault cycle; (D) Characteristics of aggressive and violent patients and victims; (E) Verbal intervention and de-escalation techniques and physical maneuvers to defuse and prevent violent behavior; (F) Strategies to prevent physical harm; (G) Appropriate and inappropriate use of restraining techniques in accordance with Title 22; (H) Appropriate and inappropriate

use of medications as chemical restraints in accordance with Title 22; (I) An opportunity to practice the maneuvers and techniques included in the training with other employees they will work with, including a meeting to debrief the practice session. Problems found shall be corrected.

### EMPLOYEE ACCESS TO THE WRITTEN WVPP

This written WVPP shall be available and easily accessible to employees, authorized employee representatives, and representatives of Cal/OSHA at all times. This will be accomplished by:

• Whenever an employee or designated representative requests a copy of the written WVPP, we will provide the requester with a printed copy of the WVPP, unless the employee or designated representative agrees to receive an electronic copy.

### RECORDKEEPING

Medical Solutions will:

- Create and maintain records of workplace violence hazard identification, evaluation, and correction, for a minimum of one (1) year.
- Create and maintain training records for a minimum of one (1) year and include the following:
  - o Training dates.
  - o Contents or a summary of the training sessions.
  - o Names and qualifications of persons conducting the training.
  - o Names and job titles of all persons attending the training sessions.
- Records of violent incidents, including but not limited to, violent incident logs records of workplace violence incident investigations, shall be maintained for a minimum of five (5) years.
  - The records of workplace violence investigations shall not contain medical information per subdivision (j) of section 56.05(j) of the Civil Code.
- All of the above records shall be made available to Cal/OSHA upon request for examination and copying.
- All of the above records shall be made available to employees and their representatives, on request, for examination and copying, no later than 15 days after the request for access is made in accordance with Labor Code section 3204(e)(1).

### REVIEW AND REVISION OF THE WVPP

This WVPP will be reviewed for effectiveness:

- At least annually.
- When a deficiency is observed or becomes apparent.
- After a workplace violence incident.
- As needed.

Review and revision of the WVPP will include the procedures listed in the EMPLOYEE ACTIVE INVOLVEMENT section of this WVPP, as well as the following procedures to obtain the active involvement of employees and authorized employee representatives in reviewing the plan's effectiveness:

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- Review of the Company's WVPP should include, among other things (as applicable):
  - o Review of incident investigations and the Violent Incident Log;
  - Assessment of the effectiveness of security systems, including alarms, emergency response, and security personnel availability (if applicable);
  - Staffing, including staffing patterns and patient classification systems that contribute to, or are insufficient to address, the risk of violence;
  - Job design, equipment, and facilities;
  - Security risks associated with specific units, areas of a client facility with uncontrolled access, late-night or early morning shifts, and employee security in areas surrounding the facility such as employee parking areas and other outdoor areas as noted by employees at the individual facilities not under the Company's control but at which its employees are assigned to work;
  - The WVPP as it applies to units within a client facility, the client facility as a whole, or the particular operation not under the Company's control but at which its employees are assigned to work and updated whenever necessary: (A) to reflect new or modified tasks and procedures which may affect how the Plan is implemented; (B) to include newly recognized workplace violence hazards; (C) to review and evaluate workplace violence incidents which result in a serious injury or fatality; (D) to review and respond to information indicating that the Plan is deficient in any area.
  - O When a revision to the Plan is needed for only part of the facility or operation, the review process may be limited to the employees in the unit(s) or operation(s) affected by the revision, independently of the annual review for the Plan for the facility as a whole
- Assessment as to whether violence risks are being properly identified, evaluated, and corrected. Any
  necessary revisions will be made promptly and communicated to all employees. These revisions could
  involve changes to procedures, updates to contact information, and additions to training materials.
- Problems found during the review shall be corrected in accordance with Labor Code § 3342(c)(11).

### **EMPLOYER REPORTING RESPONSIBILITIES**

As required by California Code of Regulations (CCR), Title 8, Section 342(a). Reporting Work-Connected Fatalities and Serious Injuries, Medical Solutions will immediately report to Cal/OSHA any serious injury or illness (as defined by CCR, Title 8, Section 330(h)), or death (including any due to Workplace Violence) of an employee occurring in a place of employment or in connection with any employment.

This WVPP was authorized by:	Lexie Myers	Vice President Talent Management
Lexie Myers		09 / 11 / 2024
Signature of Authorizing Individual		Date of Signature

### **Healthcare Violent Incident Log**

This log must be used for every workplace violence incident that occurs in our workplace. At a minimum, it will include the information required by Labor Code section California Labor Code § 3342(d).

The information that is recorded will be based on:

- Information provided by the employees who experienced the incident of violence.
- Witness statements.
- All other investigation findings.

All information that personally identifies the individual(s) involved will be omitted from this log, such as:

- Names
- Addresses physical and electronic
- Telephone numbers
- Social security number

Date of Incident:	
Time incident occurred:a.m./p	.m.
Location(s) of Incident/Department	Workplace Violence Type (Indicate which type(s (Type 1, 2,3,4)
Check which of the following describes the type(s) of being logged), and explain in detail:	incident (i.e. the nature or characteristics of the incident
☐ Physical attack, including biting, choking, grabbing pulling, scratching, or spitting.	g, hair pulling, kicking, punching, slapping, pushing,
☐ Attack with a weapon or object, including a gun, ki	nife, or other object.
☐ Threat of physical force or threat of the use of a we	eapon or other object.
☐ Sexual assault or threat, including, but not limited to verbal or physical sexual contact.	to, rape, attempted rape, physical display, or unwanted
☐ Animal attack.	

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☐ Other. Specify:
Explain in detail regarding a description of the incident and any additional information on the violence incident type and what it included (Continue on separate sheet of paper if necessary):
Workplace violence committed by (For confidentiality, only include the classification of who committed the violence, including whether the perpetrator was a patient/client/customer, family/friend of a patient/client/customer, stranger with criminal intent, coworker, supervisor/manager, partner/spouse, parent/relative, or other perpetrator):
Circumstances at the time of the incident (write/type what was happening at the time of the incident, including, but not limited to, whether the employee was completing usual job duties, working in poorly lit areas, rushed, working during a low staffing level, in a high crime area, isolated or alone, unable to get help or assistance, working in a community setting, working in an unfamiliar or new location, or other circumstances):

Where the incident occurred (whether it was in a patient or client room, emergency room or urgent care, hallway, waiting room, restroom or bathroom, parking lot or other area outside the building, personal residence, break room, cafeteria, or other area):
Consequences of the incident, including, but not limited to:
<ul> <li>Whether medical treatment was provided to the employee;</li> <li>Who, if anyone provided necessary assistance to conclude the incident (such as, but not limited to, security or law enforcement);</li> <li>Amount of lost time from work, if any;</li> <li>Actions taken to protect employees from a continuing threat, if any.</li> </ul>
The consequences of the incident were:
• Were there any injuries? Yes or No. Please explain:
• Was medical treatment provided to the employee? Yes or No. If yes, explain below:
• Did anyone provide necessary assistance to conclude the incident? Yes or No. If yes, explain:
• Did the employee(s) lose time from work? Yes or No. If yes, how much time?
What actions were taken to protect employees from a continuing threat, if any. Explain.
Did the severity of the injuries require reporting to Cal/OSHA? If yes, document the date and time this was done, along with the name of the Cal/OSHA representative contacted.
A copy of this Violent Incident Log was provided to Medical Solutions management. Indicate when it was provided and to whom.
This Violent Incident Log was completed by:  Printed Name and Title
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Signature of Individual Completing Log	Date Log Completed
Contact Info (Email address and Phone number) for Person	on Completing Log:

## **Signature Certificate**

Reference number: DJWFK-GDQJZ-SSSUE-RZQNS

Signer Timestamp

Lexie Myers

Email: lexie.myers@medicalsolutions.com

 Sent:
 11 Sep 2024 15:49:43 UTC

 Signed:
 11 Sep 2024 15:49:44 UTC

Signature

Lexie Myers

IP address: 97.119.178.178 Location: Omaha, United States

Document completed by all parties on:

11 Sep 2024 15:49:44 UTC

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