

2. Good Neighbor Policy

Copa Health provides services regulated by the Arizona Department of Health Services, Arizona Department of Developmental Disabilities, and the Centers for Medicare and Medicaid Services. As such, Copa has robust policies, procedures and protocols related to coordination of communication, complaint response procedures, including investigation, remedial action, and follow-up; environmental safety measures.

Point of Contact

All Copa site information is conspicuously posted and made available on Copa's website:

- www.copahealth.org

Copa Health shall identify an operational lead and make available a phone number for members, stakeholders, and the community to contact the identified lead. Copa's website has a 24/7 monitored mechanism (email and phone) that any individual may utilize to communicate concerns.

- <https://secure.ethicspoint.com/domain/media/en/gui/69473/index.html>
- 1-844-972-8587

The reporter may share their contact information or maintain anonymity. The information is immediately forwarded (via alert) to Copa's Compliance Manager and Director of Quality Management for appropriate follow-up. The Chief Risk and Compliance Officer is given real-time notice of all reported incidents, grievances, and complaints. Program Leadership is notified as appropriate.

Follow up may include, but is not limited to:

- Contact with the Reporting Individual
- Executive Team Notification
- Facility Work-Order Submission
- Human Resources Collaboration
- External Reporting
- Fact-Finding
- Trend Analysis

Monitoring and Review

Monitoring and review functions will be carried out by Copa's Compliance and Quality Management Team and Safety Committee.

Copa's CEO and Chief Risk and Compliance Officer will report to the Board of Directors on an ongoing basis relative to the organization's activities to protect the persons served, community and to maintain safe working conditions and environments.

Role of the Board of Directors

The Board of Directors, through the Chief Executive Officer and Chief Risk and Compliance Officer, will:

- Ensure policies are developed and maintained which preserve and protect the human rights of individuals served, employees, communities, and other stakeholders.

- Ensure ongoing policies are developed and maintained which promote compliance and adherence to legal requirements and code regulations relative to health and safety.

Role of the Chief Risk and Compliance Officer

The Chief Risk and Compliance Officer will:

- Oversee procedures which preserve and protect the human rights of individuals served, employees, communities, and other stakeholders;
- Oversee ongoing policies which promote compliance and adherence to legal requirements and code regulations relative to health and safety;
- Refer all human rights complaints and concerns according to grievance policies and procedures, utilizing the appropriate funding source and Human Rights Key Personnel;
- Adhere to the grievance and appeal policies and procedures;
- Maintain an active Safety Committee which oversees all areas of health and safety; and
- Maintain an active Quality, Risk and Assessment Management Team which oversees all areas of organizational procedures designed to promote quality services throughout departments.

Components of the Policy on Health and Safety

Copa protects and preserves the needs of all individuals served and adheres to comprehensive behavior management policies and procedures.

- Statements of rights are included in all procedure manuals and distributed to all individuals served through handbooks and orientation materials in wording and language that is accessible, meaningful, and understandable to the person served;
- Individual rights are explained during intake/enrollment, and at least annually, to all individuals served. Individuals acknowledge their involvement in the process by signing a statement of understanding;
- No denial of any rights may be made unless the exercise of those rights constitutes an immediate threat to the individual's health and safety, or the health and safety of others. The individual teams are responsible for approving the need for any restriction of rights and will review the need to continue any restrictions at the individual's team meetings;
- Behavior management policies and procedures comply with state and federal laws;
- Staff members are provided training in Positive Behavior Support;
- Informed consent is documented in all cases in which behavior treatment plans are written and/or behavior intervention approaches are utilized;
- Behavior management procedures identify staff responsibilities, utilization of intervention techniques, monitoring of treatment plans, and the utilization of behavior modifying medications; and

- Positive behavior interventions and approaches to maladaptive behaviors are implemented prior to the use of any restrictive procedures and all such interventions are documented in case files and are approved by the Individual Service Plan (ISP) Teams.
- Copa protects the health and safety of individuals served, the community and employees.
- Staff members, individuals and teams are designated for organizing and maintaining an active health/wellness and safety program;
- Safety policies and job descriptions confirm the responsibility of employees;
- The Safety Committee meets on a regular basis;
- Staff members are aware of their health and safety responsibilities;
- Safety orientation and training are provided for individuals served, staff members and volunteers;
- Staff receive annual competency-based training that is documented on health and safety practices, identification of unsafe environmental factors, emergency procedures, evacuation procedures (if appropriate), identification and reporting of critical incidents, medication management (if appropriate), reducing physical risks, and other topics as appropriate;
- Comprehensive external inspections of the premises and operations in all locations are completed by competent authorities at least annually. There is documentation which ensures that appropriate steps are taken to remedy safety recommendations;
- Quarterly self-inspections are conducted for potential health and safety hazards on each shift. Recommendations from these inspections are documented;
- Each Copa program will maintain an approved written disaster and recovery plan that includes procedures for fires, bomb threats, natural disasters, utility failures, medical emergencies, violent person in the workplace, pandemic threats, vehicle evacuations and safety during violent or other threatening situations;
- Emergency plans and procedures are communicated to all appropriate personnel and individuals served;
- Unannounced tests of emergency plans are conducted at least annually on each shift and are documented;
- Appropriate numbers of staff are certified in basic safety techniques, including CPR, first aid, managing aggressive behaviors, etc.;
- All incidents, including serious illnesses, injuries and alleged cases of abuse/neglect are reported and reviewed according to the tracking systems which include a review by the Compliance and Quality Management Team. Action is taken to resolve or prevent further incidents;
- Written infection control policies and procedures are developed and implemented, and appropriate training occurs which focuses on controlling and preventing infection;
- Daily operations and services reflect the maintenance of a safe and healthy environment for all staff members and persons served;
- Adequate first aid and emergency supplies are maintained by management at each location.

- Biological hazardous materials and fire suppression equipment are maintained by outside contractors at all locations;
- Adequate first aid and emergency supplies are maintained in all vehicles by Copa's fleet management company; and
- Vehicle operators are properly trained in emergency procedures, accident reports, road emergencies, wheelchair tie-downs, hydraulic lifts, GPS two-way communication systems and proper techniques and seating arrangements for assisting persons who have disabilities.

END OF POLICY DOCUMENT