



Employment Services Policies and Procedures

Effective 2/27/06

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Part I : Overview

Mission, Philosophy and Program _____

The mission of ICON Employment Services is to broaden public awareness and improve access to opportunities in the community for people who have historically been excluded because of disability. ICON was initially founded in 1985 as an agent for systems change through the efforts of the five Northern Virginia Community Services Boards and the Specialized Training Program of the University of Oregon. A volunteer board of directors governs the organization and hires a professional staff to carry out its mission. ICON maintains an office in Alexandria, Virginia in order to carry out administrative functions. Most agency activities, however, take place in the surrounding community.

Philosophy and Goals

It is the philosophy of ICON that people with disabilities, regardless of the degree of their disability, are people of value and are entitled to be treated with the same dignity and respect afforded non-disabled citizens of the community. Consistent with these beliefs, ICON supports The Community Imperative, the principles of normalization, the concept of the least restrictive environment, and the developmental model as the cornerstones to the philosophy of the corporation.

The Community Imperative

In the domain of Human Rights:

- *All people have fundamental moral and constitutional rights.*
- *These rights must not be abrogated merely because a person has a mental or physical disability.*
- *Among these fundamental rights is the right to community living.*

In the domain of Educational Programming and Human Services:

- *All people, as human beings, are inherently valuable.*
- *All people can grow and develop.*
- *All people are entitled to conditions which foster their development.*
- *Such conditions are optimally provided in community settings.*

Therefore: In fulfillment of fundamental human rights and in securing optimum developmental opportunities, all people, regardless of the severity of their disabilities, are entitled to community living.

(The Community Imperative may be found at <http://thechp.syr.edu/adimper.htm>)

Normalization

Normalization challenges us to direct all our resources and efforts to assist people with disabilities to acquire valued social roles in the community. Consistent with these principles, the agency's services are designed to assist consumers in accomplishing five things. They are: Community Presence, Community Participation, Image Enhancement, Competency Building, and Protecting Rights and Personal Freedoms.

Community Presence

Individuals with disabilities have historically been physically segregated from their communities. ICON wishes to reverse this situation by making it possible for individuals with disabilities to work in real jobs in the community indistinguishable from those of their non-disabled peers, using public transportation whenever possible, and to develop relationships with co-workers, socialize with others during lunch breaks in employee cafeterias and restaurants, and use generic resources such as banks and post offices. The underlying theme here is for people with disabilities to share the ordinary places which define community life.

Community Participation

Physical segregation has led to social isolation for the people we serve. ICON's goal is to provide the opportunity for them to develop a growing network of personal relationships. This includes relationships with co-workers on the job and at employer-sponsored events. It also includes relationships which develop into friendships.

Image Enhancement

When people are socially isolated and physically segregated, they tend to be devalued by society and by themselves. ICON is committed to enhancing the image of people with disabilities. We stress age-appropriate activities, work and productivity, earning money, having possessions, and spending time in valued activities.

Competency Building

Many of the individuals we serve have had access only to 'special' activities and sheltered 'pre-work' programs. These do little to provide people with real-world skills and experience. ICON's goal is to enable people to develop marketable skills and to experience the responsibilities and rewards of full citizenship in the community.

Protecting Rights and Personal Freedom

People with disabilities have historically had little control over their lives and have largely learned to be dependent on others. ICON's goal is to help people make informed choices by practicing decision-making. This is accomplished through an exposure to

what the community has to offer, having increased social and work opportunities, and having an ability to communicate needs and desires.

The Least Restrictive Environment

In conformance with the principle of the least restrictive alternative, the services provided by ICON will interfere to the least extent possible with the individual consumer's rights and privileges, both physically and socially, and only to the degree necessary to respond to the individual's needs, wants and desires. Conversely, the agency will, to the fullest extent possible, support consumers in understanding, appreciating, and exercising their rights, freedoms, and responsibilities; this will in turn improve their ability to make informed choices.

The Developmental Model

ICON adheres to the developmental model, which states that a person's development continues throughout life and is usually sequential in manner. ICON's activities must be designed to maximize the individual's potential, increase the complexity of their behavior, and enhance their ability to cope with their environment. All services provided will be appropriate and relevant based on each individual's strengths and needs. These will be identified through a team process with the active participation of the consumer.

This implies a responsibility to foster positive attitudes of understanding and support in the community through a continuing effort of public education.

Continuous Quality Improvement

ICON Employment Services utilizes a program evaluation system which is based on the principles of Continuous Quality Improvement (CQI). These principles are derived from the thinking of Edward Deming, Tom Peters, Thomas Gilbert, Joyce Dean, and a variety of others. The basic principles are presented below, including ICON's process for incorporating them into daily operations:

- Our mission must focus on the continued improvement of quality outcomes for our customers. In supported employment, there are many customers, including supported employees, community businesses, funders, families, staff, and the community in general.
- ICON assesses customer satisfaction in a number of ways. Job development efforts are focused on the preferences of individual applicants and their families. The Individual Service Planning Process helps individuals and their families to establish goals and assess their achievement. Feedback is obtained from community businesses regarding their satisfaction with individual supported employees and ICON services. Funders express their satisfaction by continuing to purchase services.

- Our organization must have a unity of purpose, as expressed by our mission statement. Everyone must understand both the mission itself, and how they fit into it.
- Staff must have the skills and authority to accomplish their piece of the mission. Ongoing training and feedback is an integral part of our organizational practices. Staff should be driven by a continuous attempt to ask questions and improve outcomes.
- A scientific approach should be used to find opportunities for improvement. Data should be used for decision making in a constant effort to improve outcomes. ICON has a database in place which allows for an ongoing analysis of outcomes. Examples of the kinds of analysis completed on a regular basis are the length of time between referral and job placement and the sources of successful job placements. The Executive Director and management staff focus a good deal of effort on deciding how best to collect and use data for the purpose of improving consumer outcomes.
- Quantitative and qualitative measures are used to assess outcomes and find opportunities for improvement. ICON utilizes a Program Improvement Guide on an annual basis to formally assess the outcomes of our focus on continuous quality improvement.
- In addition to this annual review, ICON continuously reviews a variety of data to assess the ongoing quality and efficiency of our services.
- The Individual Service Planning process reveals individual satisfaction and progress toward the accomplishment of goals. This in turn drives future planning for the individual as well as planning for the agency as a whole.
- ABC charts and Pareto analysis are used in the development and review of behavior management plans. These analyses reveal whether progress is being made and, if not, they signal the need for a new approach.

Corporate Activities

In order to accomplish its mission, ICON offers the following services to the community:

- Supported Employment Services - long-term support for individuals working in both individual and small group environments
- Short Term Job Placement and Training Services
- Life Skills Training - intensive, limited term assistance with mastering the skills of daily living
- Independent Living Skills - long-term support to help individuals manage their everyday lives
- Community Living Services to assist individuals to live as independently as possible and achieve full citizenship in the community
- Formal and Informal Workshops and Seminars for community businesses, family members, and professionals in the field

- Technical Assistance to businesses and other support organizations to troubleshoot programmatic or physical barriers to the successful employment of individuals with disabilities
- Functional Analysis aimed at determining the function of individual behavior and providing alternative strategies to enable the individual to achieve the desired result without engaging in behavior that may be problematic for themselves or others in the environment

Part II : Employment Services Policies and Procedures

Eligibility for Services

It is ICON's policy to accept all persons who request services, as long as they meet the eligibility criteria set out below. The sole exception is in ICON's one group employment site, where applicants can only be accepted if there is an opening. Since the rest of ICON's services are individually delivered, capacity can be increased simply by employing additional staff.

Supported Employment

Individuals who are eligible for supported employment services will meet the following criteria:

- Have a desire to work.
- Have a disability and require support in finding and succeeding at a job.
- Require ongoing, long-term support in order to maintain employment.
- Have a source of funding for long term support through public, personal, family, insurance or other funds.
- Have access to and ability to pay for appropriate transportation. Appropriate transportation may include the use of public transportation, car or van pools, or a paratransit service. Specific requirements are negotiated on an individual basis.

Short Term Placement and Training

Individuals who are eligible for short term placement and training services will meet the above requirements, with the exception of having the need and funding for long term services.

Life Skills and Independent Living Skills Training

Life Skills training refers to short-term, intensive training in basic living skills; Independent Living Skills typically covers more long-term support which may be required to help individuals manage their everyday lives so that they can participate successfully in an employment program.

ICON provides these services to individuals with a variety of disabilities, including but not limited to mental retardation, long term mental illness, severe physical disabilities, traumatic brain injury, and autism, who are funded by a variety of public and private

entities. More specific eligibility criteria may be dictated by the funding sources used to pay for ICON's services.

Accessibility

The promotion of equal and accessible employment opportunities is the cornerstone of all services provided by ICON. Careful attention is paid to attitudinal barriers, architectural barriers, employment barriers, transportation barriers, and communication barriers. ICON staff receive training in how to educate others about disability related issues and Board members are recruited on the basis of their understanding of the needs of people with disabilities. ICON is fully committed to being in compliance with the Americans with Disabilities Act requirements and other applicable laws regarding accessibility. This applies to the delivery of services and the hiring of staff.

Attitudinal Barriers

Job development, on the job training, and follow along services are focused on understanding the attitudes of employers, co-workers, and customers of the businesses within which employees with disabilities work.

Architectural Barriers

ICON's central office is located in an accessible building which is convenient to the public metro system and private accessible transportation companies. Staff also pay careful attention to the architectural barriers faced by the employees we support and provide guidance to potential employers.

Employment Barriers

ICON staff continually identify barriers at all stages of the employment process as a component of the service we provide to our customers. This may involve drawing the employer's attention to the barrier, suggesting ways in which it might be removed, or advocating for an accommodation, if applicable.

With respect to its own hiring practices, ICON adheres to all federal and state laws regarding employment, practices affirmative action, and is an equal opportunity employer. A more detailed description of ICON's employment practices may be found in the *Personnel Policies and Procedures*.

Transportation

ICON does not directly provide transportation services. Every effort is made, however, to connect our clientele to accessible transportation. This includes the provision of travel training.

Communication

ICON staff are committed to supporting individuals in functional, person-specific communication systems. This includes, but is not limited to, speech, sign language, facilitated communication, computer assisted strategies, and personalized gestures. The manner of communication used will be tailored to each individual's preference.

Individualized Service Planning _____

ICON is committed to a formal planning process which involves the active participation of the consumer at every level. This process results in a series of written service plans.

Participation in service planning is documented and includes the following:

- the consumer
- the consumer's family, guardian, or other individual(s) at the request of the consumer
- representatives of the agency or agencies providing funding for services, should they choose to attend

Service planning will not take place without the presence and participation of the consumer. Funding agents have a right to participate but the consumer has the right to exclude any other persons if they choose. ICON will not exclude any persons from participation except at the request of the consumer.

An individualized service plan is developed as part of the initial meeting between the consumer and ICON staff. This plan defines and describes the expected outcomes of services and the activities which will be undertaken to achieve those outcomes. It is based on the individual's strengths, needs, and preferences and takes into account the functional effect of the person's disability as it relates to employment. ICON refers to this document as the Individualized Services Agreement (ISA).

The Individualized Services Agreement includes, at a minimum:

- an assessment of the consumer's strengths, needs, preferences, and relevant accomplishments
- a statement of the consumer's goals for the service
- an estimate of the services and supports and frequency of service needed to accomplish the individual's goals

- target dates for accomplishment of each stage of the process
- estimated duration of service
- other agencies if the plan is a shared responsibility
- staff responsible for coordination and integration of services, including the persons of other agencies if the plan is a shared responsibility

Based upon the services desired, more detailed written plans may be developed for situational assessment, job development, and initial on-the-job training.

For those who are receiving long-term funding through a Community Services Board, once the individual is stable on the job and funding transfers to the CSB, a formal statement of Goals and Objectives for long-term job success is developed. These statements are generally annual in nature, and are reviewed every quarter to ensure that the goals remain relevant. ICON refers to these documents as 'Goals and Objectives' but they are commonly referred to as 'the ISP' by other service providers and funders. Statements of Goals and Objectives include, at a minimum:

- A statement of a discrete goal and a series of objectives to be undertaken to meet the goal. Goals and objectives are written in such a way as to be objectively measurable
- A 'baseline' measurement - what is the situation at the effective date of the goal
- A description of the method to be used to achieve the objectives and the way in which progress will be documented
- A record of who will help the person to achieve the goal, when the goal becomes effective, how often support will be required to help the person achieve the goal, and what date the goal is expected to be accomplished.
- an assessment of the consumer's strengths, needs, preferences, and relevant accomplishments

Signed and dated progress notes are one method used to document the implementation and outcomes of service plans. Progress notes include, but are not limited to:

- significant events, positive and negative
- changes in the consumer's social, emotional, and family situation
- the consumer's progress towards accomplishing the objectives of the plan

Once a job has been found and the individual has been through initial training and is stable in employment, those who will be receiving long-term support from a local Community Services Board develop a long-term plan focused on one or more goals to be pursued during the coming year, along with interim objectives. These plans are often called Individual Services Plans, but to avoid confusion with the Individual Services Plan Agreement, ICON refers to them as 'Goals and Objectives'.

These plans are reviewed at least quarterly, with goals and objectives updated, if indicated. Quarterly reviews are signed and dated by both the consumer and the person responsible for providing services. An annual review is conducted at the time of

the annual meeting, which reports on the progress and utility of the goals, reassesses the individual's strengths, needs, and preferences, and may indicate the direction the consumer wishes to take with goals and objectives in the following year.

Consumer Information and Records

Confidentiality, Accessibility, Security, and Retention

It is the policy of ICON that all consumer information shall be kept confidential. All consumer records will be maintained in a secured filing system. They are kept in their entirety for a minimum of three years after discharge or date of last contact unless otherwise specified by state or federal requirements.

Written permission for release of information is not required for exchange of information among program staff. Program staff include all paid full time and part time employees and paid consultants.

Written permission for release of information is required to obtain confidential consumer information from other agencies or individuals, or to release confidential consumer information to other agencies or individuals. An information release document is valid for no more than one year from the date of signing.

Further regulations governing the maintenance of confidential records and the rights of the individual with respect to their records are detailed in ICON's Human Rights Policies and Procedures.

Content of Records

Each consumer record contains, at a minimum:

- a standard referral form
- referral and assessment information
- documentation that the consumer has been apprised of his rights
- service plan and service plan reviews
- progress notes
- training data
- termination summary, if applicable

Entries in each consumer record are current, dated, and authenticated by the staff member making the entry. Errors are corrected by striking through and initialing.

Permanent information kept on each consumer includes:

- consumer's name
- date of consumer's birth
- dates of acceptance and termination
- name and address of legal guardian, if any

ICON staff review records on a regular basis for completeness, accuracy, and timeliness of entries.

Grievances

Any consumer or authorized representative has a right to express a grievance orally or in writing and is entitled to have that grievance heard by a person who has the authority to act and, if the complaint is adjudged to be just and reasonable, to have prompt remedial action taken. A grievance is defined as any complaint by the consumer arising out of any policy or action which the individual thinks, believes, or feels is unfair, unjust, or inequitable. The consumer or his/her authorized representative may present a grievance orally or in writing. Under no circumstances will the filing of a grievance result in retaliatory action or any change in quantity or quality of services received. In preparing materials for any step of the appeals process, the consumer or an authorized representative may call upon the Regional Human Rights Advocate, or other advocate, for assistance. Grievance procedures observed for any complaint brought by a consumer on any subject will be those mandated by the state for Human Rights complaints, which may be found in ICON's Human Rights Policies and Procedures document, except that for grievances not related to human rights, ICON's Board of Directors will serve as a final arbiter in place of the Human Rights Committees.

Behavior Change

When supporting individuals in the community, it is recognized that instances will arise in which certain behaviors will be in need of change. Managing this change may require the implementation of a formal behavior support plan.

In developing a behavior support plan the assumption will be made that an individual's behavior is in large part a learned response, and should be viewed as a form of communication. If an environment can be created which reliably and consistently provides instruction in an alternative behavior pattern which yields an improved result, the individual will adopt it. All intervention strategies should be variations of applied procedures with documented success in research settings.

The behavior support procedures used will comply with the guidelines established by the Fairfax-Falls Church Community Services Board and state Human Rights regulations, as detailed in ICON's Human Rights Policies and Procedures document. Procedures used will comply with these guidelines:

- ICON does not practice seclusion or restraint, as defined in Virginia Human Rights Regulations (12 VAC 35-115-30).
- All plans will be developed by a team of individuals who will be directly involved with the implementation of the plans.
- The plan will include:
 - Definition of the specific target behavior to be increased or decreased. This definition should be written so that anyone who reads it is able to recognize and count occurrences of the behavior.
 - Specification of a target goal for the behavior support plan. This goal should be related to a quantifiable unit of behavior and this unit should be used in a monitoring system that allows determination of when the goal is reached.
 - Description of an intervention strategy to reach the target goal. The intervention chosen will be the least intrusive method which will produce positive results.
 - Specific measurement procedures and provisions for weekly evaluation. If the behavior of the individual does not improve within a short time period (two to three weeks) after the intervention is implemented, the intervention should be modified or terminated.
- Plans will be terminated when their goals have been met, or it has become clear that the intervention is not likely to be effective.

The following procedures are specifically prohibited:

- Physical punishment.
- Seclusion in a locked room.
- Ridicule, coercion, threats, or humiliating remarks.
- Withholding of meals or aids to physical functioning.
- Punishment of one consumer by another.
- Use of chemical restraints.
- Use of mechanical restraints.
- Any action which is humiliating, degrading, harsh or abusive
- Time-out procedures
- Subjection to unsafe, unclean or unsanitary conditions
- Deprivation of opportunities for access to restroom facilities
- Administration of medications or medical preparations for purposes of punishment or behavior management

As with any intrusion into the physical and psychological parameters of another's life, behavior support interventions should receive thoughtful consideration, careful planning and responsible monitoring. As a last resort measure in an emergency when an individual is out of control and risks harm to the individual or others and all other attempts at intervention have failed in that specific instance, physical intervention may be used. The physical intervention shall only be what is minimally necessary to protect the individual and/or others. Shadowing (placing one's own body between the individual

and the target of his or her aggression) shall be used as a minimal step. If shadowing is not successful, then physical restraint may be used in a crisis, but not as a regular means of managing the behavior for an individual. If physical restraint is used, it shall only be what is minimally necessary to protect the individual and/or others.

Techniques that may be used to modify an individual's performance or behavior may be direct or indirect. The following may be used by all staff, although changes to currently established procedures for an individual should be done in conjunction with other staff, so that consistency of approach can be maintained.

- Offering assistance or support
- Offering of choices, expansion of individual choice and decision making
- Functional analysis of the behavior
- Pragmatic analysis of individual's communication
- Direct positive instruction including but not limited to the following:
 - Teaching a positive means to communicate one's wishes
 - Teaching an alternative behavior
 - Encouraging an alternative behavior using social reinforcement, delayed reinforcement, immediate reinforcement, or tangible reinforcement
- Modification of the task or activity or schedule
- Planned ignoring of the occurrence of the problem behavior without ignoring the individual. This should only be used after an alternative form of behavior has been taught or offered to the consumer, as behavior serves a specific purpose for which the individual may have no alternative form of communication.
- Distraction or redirection of the individual to a desired behavior or activity
- Environmental modification or adaptation
- Enhancement of individual's life opportunities, opportunities for variety of experiences and enjoyable activities with a variety of individuals, particularly participation in typical activities and interactions with non-disabled individuals
- Verbal prompting, cueing, reminders, etc. done in a positive, non-reprimanding way

Use of the above techniques will be documented according to specifications of individual performance/behavior change plans for data collection or using a standard ABC (antecedent-behavior-consequence) chart.

Safety

ICON shall maintain such standards and procedures as are necessary to ensure that consumers and staff work and receive other services in a safe environment and that ICON complies with all applicable sanitation, health, environmental and safety codes and regulations of the local, state and federal government.

To achieve this goal, ICON may establish an ad hoc safety committee which will review ongoing agency practices on an as-needed basis.

ICON will utilize the consumers' individual planning teams to determine the individualized supports necessary for participation in community activities, and the nature of documentation required for decisions made to reduce individual supports.

Employees whose positions may require them to transport consumers must have no more than one moving violation in the three years preceding the date of hire as indicated by copies of their records issued to by the Department of Motor Vehicles. Any exceptions to this policy must be authorized by the Executive Director. DMV records are also reviewed on a scheduled basis throughout the term of employment. Employees should be counseled that they may be able to remove moving violation points from their driving record by attending a DMV-sponsored driving course.

All accidents involving staff or consumers shall be reported on an ICON Incident Report Form and reviewed by the Program Director and Executive Director.

Consumers who have a history of disruptive behavior will have support plans which include specific procedures to be followed in the event of the following:

- self-injurious behavior
- injury to others
- injury to property

Plans will comply with applicable laws and regulations regarding behavior management, abuse and neglect, confidentiality, and human rights.

Communicable Disease

ICON recognizes its responsibility to provide services to people with disabilities in Northern Virginia, and further recognizes its responsibility to promote a safe and healthy working environment for supported employees, agency staff, co-workers, employers, and citizens in the community. ICON must, therefore, have access to relevant medical and behavioral information prior to providing services to an individual consumer. This is necessary in order for staff and relevant members of the person's interdisciplinary team to determine specific individual support needs and make recommendations regarding the best course of action to take with respect to an appropriate job placement and the provision of ongoing supports. Decisions regarding the type of employment and work setting for individuals with communicable diseases will be made on a case by case basis, taking into account the individual's physical condition, characteristics of the disease, and anticipated interactions with others. ICON's policy with respect to bloodborne pathogens is in compliance with Fairfax-Falls Church CSB Regulation 3100.2, as well as ADA and OSHA regulations. Further discussion of this policy may be found in ICON's Personnel Policies and Procedures document.

Referral procedures include the submission of medical and psychological information to ICON for use in determining eligibility for services. The process also includes an initial meeting with the consumer and his or her funding agent and, in the most effective instance, other members of the consumer's circle of support. It is at this point that relevant information regarding the existence of a communicable disease should be shared and that potential implications for service delivery be discussed. The completion of information releases should also be included in this process.

Implications for service delivery would include the specific kind of job to be obtained, information to be shared with potential employers, precautions to be taken by staff or the employer, and procedures to be followed.

Information gained and procedures developed should be documented and kept in the supported employee's file in the ICON office.

Consumer Emergencies / Medical Treatment Policy _____

ICON requires that all direct service staff receive training in first aid and CPR in order to respond to consumer emergencies. The organization will also maintain consumer records and releases of information which include relevant medical information and indicate whether or not staff have the authority to act on the consumer's behalf. Staff will accompany consumers when treatment is indicated, and inform appropriate parties of the emergency. An incident report will be completed, reviewed by the appropriate supervisor and Executive Director, and kept in the consumer's file.

Medication Administration

Individuals served by ICON may require assistance in the administration of their prescription medications. The need for this assistance should be included in the information which is submitted to ICON at the point of referral and acceptance into the program. Furthermore, each individual who requires medication, regardless of who administers it, should receive medical supervision, which includes regular evaluation of the individual's response to the medication, including appropriate monitoring and laboratory assessment. Prior to the actual delivery of services, ICON staff will develop a plan for medication administration which includes both documentation and a review of the documentation. All staff who assist in the administration of medication will successfully complete a course on medication assistance which is endorsed by the Virginia State Board of Nursing. Proper documentation of training will be kept in the individual staff member's personnel file in the ICON office.

Individuals who request assistance in the administration of non-prescription medications, such as aspirin, should advise the ICON staff at the point of referral or at any time in the process of service delivery. They will be also be required to complete a Medication Authorization Release for this purpose. Under no circumstances will an ICON staff member dispense a non-prescription medication if this procedure has not been followed.

Specific procedures used with an individual consumer are somewhat determined by the nature of their daily activities. Because ICON supports individuals in a variety of settings, medications are not administered from the same central location for all people. It is, therefore, not possible to maintain a locked cabinet which stores all medications. The individual's Interdisciplinary Team must instead determine the most logical setting in which the activity will take place. There are, however, more general procedures which do apply:

Administration

Each consumer who uses medications and requires assistance for that activity shall sign a consent to accept assistance from ICON staff. In the absence of consumer consent the written consent of the person's parent, guardian, or designee will be accepted.

Medication shall only be given to an individual consumer when ICON has received a written order by a physician or other legally authorized person.

Medications will be presented to ICON staff in a bottle with a legible pharmacy label. The unit dose should appear on the label.

The medication should be given as indicated by the medication record. This should include name of the consumer, name of medication, dosage amount, and dosage time. The record should also indicate any adverse reactions to look for, as well as procedures to follow in the event they occur.

Documentation

Active documentation of medication administration should be kept with the medications themselves. Completed forms should be filed in the consumer's file in the ICON office.

Medication administration should be logged on the monthly medication record. This is the responsibility of the staff person administering the medication. This record should be reviewed on a monthly basis by the staff person's supervisor and filed in the consumer's file in the ICON office.

Medication errors should be documented on the Medication Error Record. This form should be submitted for review by the staff person's supervisor, and then filed in the consumer's file. The supervisor should then contact the individual's physician to obtain advice on what course of action to take. The supervisor should also contact the consumer's family and/or residential provider to inform them of the situation. A copy of the error report should be sent home as well.

Incidents

Any signs of adverse reactions or refusal to take the medication should be reported to the staff person's supervisor. If emergency procedures are necessary, these should take precedence over immediate notification. After medical attention is obtained, notification should take place.

Should this kind of incident take place, the regular ICON incident reporting procedure should be followed.

Interface with Family or Residential Program

ICON staff will notify the family or residential provider no later than one week before a medication should be refilled.

It is the responsibility of the family or residential provider to send a change of medication (or discontinuation) notice to ICON along with the new prescription bottle.

The family or residential provider and ICON staff should contact one another directly if there is any question or doubt about a medication order or change.

Human Rights

ICON complies with state law and regulations regarding Human Rights (12 VAC 35-115). ICON's *Human Rights Policies and Procedures* document details the practices mandated by these regulations and is an essential document governing service delivery in all of ICON's programs.

Allegations of Abuse or Neglect

It is the responsibility of all ICON staff members to guarantee that the rights of participants in our program are respected and protected. Substantiated acts of abuse or neglect by ICON staff are cause for immediate dismissal.

For purposes of this policy, abuse is defined as follows:

- Physical acts, such as hitting, kicking, scratching, hair pulling, pinching, choking or slapping, or any type of inappropriate striking or touching of a consumer.
- Coercion, threats or intimidation which are statements or actions that would evoke fear in a reasonable person or that could reasonably be expected to evoke fear in the consumer
- Neglect in care which is the failure to provide treatment, care, goods, or services necessary to the health, safety or welfare of a consumer

- Statements or actions which would humiliate, demean or exploit a consumer; or condoning or permitting the abuse of a consumer

It is the responsibility of staff to insure that a summary statement of ICON's rights policy be read to each program participant and provided to his/her guardian or family upon being accepted as an active referral.

Any ICON staff person who restricts or infringes on the rights of a program participant, including but not limited to acts of abuse as defined above, is subject to dismissal from employment for misconduct as provided for in the Personnel Policies and Procedures:

Any member of the ICON staff against whom allegations of abuse have been made may be placed on administrative leave with pay pending the results of an investigation of the allegations by the Executive Director and/or appropriate authorities.

Results of all investigations of allegations made against a member of the ICON staff will be shared with the employee. A copy of the results will be maintained in the employee's personnel file.

The specific procedures for reporting and following up on allegations of abuse, neglect, or exploitation are detailed in ICON's *Human Rights Policy and Procedures* document. In addition, all ICON staff, by virtue of their employment, are 'mandated reporters' who are required by law to immediately report any instance of abuse or neglect they become aware of, regardless of whether it is directly related to ICON staff or consumers, to the office of Adult Protective Services (<http://www.fairfaxcounty.gov/dfs/factsheets/aps.htm>)

Incident Reporting

It is necessary for personnel employed by ICON to utilize a standardized reporting procedure with respect to documenting a variety of significant and/or unusual events involving supported employees or staff members. Regardless of the nature of the incident, however, the primary concern of ICON is the safety and welfare of the individual(s) involved. Therefore, the first responsibility of ICON staff is to assure that appropriate medical or behavioral intervention takes place prior to implementing the reporting procedure.

Incidents Requiring Reports

Incidents which must be reported include but are not limited to:

- Any serious injury to a supported employee or staff member which is sustained on the job.
- Any suspected neglect, exploitation, verbal abuse, physical abuse, sexual abuse, or sexual exploitation.

- Any situation which has involved the police, fire officials, emergency rescue personnel, or emergency hospital services.
- Any situation in which a staff member has physically intervened to control or physically redirect a consumer.
- Any severe or unusual behavior that requires outside intervention and/or removal of a consumer from a job site or from ICON services in general.
- Any violation of the basic rights of a consumer including, but not limited to, suspension or dismissal without cause from a job.
- Any situation in which a consumer is missing from a job site or from the setting in which they are normally served by ICON.
- Any case of communicable disease discovered by ICON staff or consumers.
- Fire within the ICON offices.
- Serious theft.
- Property destruction by an ICON consumer or staff member.
- Death.

Initial Response

The majority of the incidents which take place will most likely be witnessed by and responded to by Employment Specialists who are working in the community. As stated above, their first responsibility is to assure the safety and well being of the individual(s) involved. All ICON staff receive training in first aid upon being hired by the agency. They are also equipped with pagers in the event that they require additional assistance or guidance from others.

Medical Emergencies

Incidents which constitute a medical emergency should be dealt with as calmly as possible, following steps which have been outlined in first aid training. After appropriate emergency measures have been taken, the Employment Specialist should notify the ICON office of the incident and their whereabouts. The Employment Specialist or Program Director will notify the individual's family, case manager, and other relevant program staff. Should the incident involve an injury to the Employment Specialist or other ICON staff member, procedures for worker's compensation notification will be implemented.

Suspected Abuse or Neglect

All staff members are to follow ICON procedures for reporting allegations of abuse or neglect. These are outlined in the Abuse Allegations Procedures.

Non-Medical Emergencies

Incidents which constitute non-medical emergencies, such as a consumer who is missing from a job site, should be reported immediately to the ICON office so that additional resources may be obtained and other relevant parties may be contacted.

Police Involvement

Incidents which involve the police should be reported as quickly as possible to the ICON office so that appropriate action can be taken and necessary support can be provided to the staff person and/or consumer.

Involvement of Other Citizens in the Community

Incidents which involve citizens in the community who are harmed by an ICON consumer or staff member should be reported to the ICON office as quickly as possible so that the appropriate staff member may have the opportunity to discuss the incident with the citizen. Although the initial response will most likely come from an Employment Specialist, he/she should not have to assume all responsibility for communicating with the citizen.

Behavioral Incidents

It would be impossible to outline a response to an unusual behavior on a generic basis. In most instances, when ICON staff work with an individual who has a behavior support plan in place, the plan itself indicates the response to be taken. In the event that an incident involves an unusual behavior which has not been previously observed, the ICON staff member should remain calm so as not to increase the individual's level of anxiety or anger. If it is necessary to obtain help, the staff person should attempt to get assistance from others in their immediate surroundings. If this is not possible, he/she should use a pager or telephone. Should the incident be taking place in a moving vehicle in which the staff member is the driver, he/she should immediately pull off the road, stop the vehicle, and make efforts to calm the individual. Under no circumstances should the staff member continue to drive if their passenger is in an agitated state.

Reporting and Follow-Through

After responding to any one of the significant events outlined above, and after the situation is under control, the ICON staff person notifies his/her supervisor and, if applicable, the individual's case manager. An ICON Incident Report form will be generated by the staff person and submitted within 24 hours to the staff person's immediate supervisor for review. The report should provide a factual, concise account of the incident and not an interpretation of the events; supplemental sheets may be

attached if additional space is needed. The individual's supervisor should then review the report and determine whether or not any follow up action should be taken. Any follow up activity should be documented on ICON's Incident Report Follow Up form. Completed Incident Reports and relevant documentation should be submitted to the Executive Director within 72 hours of the incident. Copies of the completed reports should also be provided to the CSB Contracts Manager and the ICON staff person designated to perform data analysis. After review, the completed reports should be placed in the individual consumer's file in the ICON office.

In addition, information from incident reports will be aggregated and analyzed on an annual basis, with a view to determining whether there are trends which may be addressed so as to reduce the risk of future incidents.

Smoking Policy _____

All ICON staff and consumers will follow the smoking policies of the businesses in which they work. The Individual Service Plan specifies consumer preferences and/or needs regarding a smoke-free environment; these will be taken into consideration when pursuing a supported employment or volunteer situation.

The ICON office itself is smoke-free.

Suspension _____

Because all of the individuals supported by ICON are employed directly by the business in which they work, ICON has no direct control over suspension from employment. Suspensions, although not a frequent occurrence, may be initiated for a variety of reasons. An employer may do so in accordance with the personnel policies of the business. This may be due to poor attendance or an unacceptable behavior on the job. ICON staff make every effort to advocate on behalf of the consumer by implementing programs designed to meet employer requirements. Specific procedures to be followed depend on the nature and reason for the suspension. At a minimum, the CSB or appropriate funding representative, family, and residential service provider are informed. The specific actions taken are intended to be in the best interests of the consumer, who is kept informed of the process.

Separation _____

Separation From Employment

Because individuals supported by ICON are directly employed by community businesses, ICON has no direct control over their hiring and firing. ICON will of course advocate for the employee to the extent possible.

Upon the termination of a supported employee, a meeting will be held with the Case Manager (or appropriate funding source representative) to review the causes of the termination and to coordinate any services the individual may need following termination from employment. This meeting will be held as soon as feasible following termination and may include a representative from ICON, the individual's legal guardian (if applicable), the individual's family (if appropriate), other relevant service providers, as well as the individual.

All activities with respect to job separation will be documented on ICON's Separation From Employment Form and filed in the employee's records.

Separation From Services

When an individual who is receiving long-term support is separated from ICON's services, a meeting of the individual's team should be scheduled so that transition to a new service provider may be facilitated. Documentation of separation activities is recorded on ICON's Separation From Services Form and filed in the individual's permanent record.