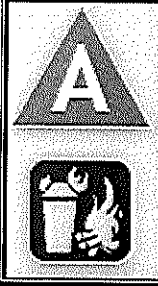
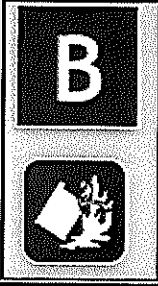
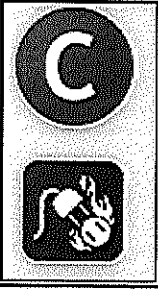


Fire Extinguisher Instructions

You are not required to fight fires with a fire extinguisher. You are allowed to only if you know and understand the following information.

	<p>Class A For Class A fires in ordinary combustibles, such as wood, paper, cloth, upholstery, plastics, and similar materials, use a water or dry chemical extinguisher with either of these symbols on the label. The numerical rating for this class of fire extinguisher refers to the amount of water the fire extinguisher holds and the amount of fire it will extinguish.</p>
	<p>Class B For Class B fires fueled by flammable liquids and gasses, such as kitchen greases, paint, oil, kerosene and gasoline, use a dry chemical or carbon dioxide extinguisher with either of these symbols on the label. Never use water. The numerical rating for this class of fire extinguisher states the approximate number of square feet of a flammable liquid fire that a non-expert person can expect to extinguish.</p>
	<p>Class C For Class C fires involving live electrical equipment or wires, use a dry chemical or carbon dioxide extinguisher with either of these symbols on the label. If possible, cut off power first. Once the power is turned off, the fire becomes Class A or B. Never use water. The presence of the letter "C" indicates that the extinguishing agent is non-conductive.</p>

- Stand at a safe distance from the fire—no closer than 8-10 feet.
- To operate a fire extinguisher, remember the word PASS:
 - Pull the pin. Hold the extinguisher with the nozzle pointing away from you, and release the locking mechanism.
 - Aim low. Point the extinguisher at the base of the fire.
 - Squeeze the lever slowly and evenly.
 - Sweep the nozzle from side-to-side.

Business Continuity, Emergency & Disaster Preparedness Plan

Location:

In the event of an emergency, if this location is not accessible we will operate from a location to be determined by the CEO, based on the circumstances. If safe, return to your home and contact the CEO (see Appendix A).

In general, if the emergency is of short duration or the damage to our facilities is slight, we will return to operations at our facility once sufficient repairs have been made. If the damage is significant or the situation of a longer duration, the CEO will investigate other opportunities, including temporary space, sharing space with another practitioner, etc. Until that decision can be made, based on the circumstances, return to your home and stay in phone contact with the CEO/Chain of command.

REMEMBER THAT IN EMERGENCIES—OFTEN TIMES TEXT MESSAGING IS MORE RELIABLE THAN LAND LINES OR PHONE LINES. PREPARE TO USE TEXT MESSAGING FOR COMMUNICATION. ALSO, WE TRACK PERSONAL E-MAIL ADDRESSES—SINCE MANY TIMES INTERNET SERVICE WILL WORK IN THE PLACES THAT EMPLOYEES HAVE EVACUATED TO, AND THAT IS AN EFFECTIVE FORM OF COMMUNICATION.

Chain of Command/Emergency Contacts The CEO is our primary Crisis Manager. If the CEO is unavailable/unreachable, please proceed down the chain of command documented in Appendix A (start at top of list & move to next person on list if they are unavailable):

If no one on the chain of command is reachable, the next most highly ranking employee is responsible. If rank is not easily ascertained, then seniority with the practice is the order to follow. When in doubt, return to your home and stay by your phone(s) and continue to try to reach those on the chain of command. Use the phone numbers in Appendix A and Appendix B to try to reach other employees. The Out of State Contact is a person who will serve as a clearinghouse of information should there be a disaster that interrupts local communications.

Natural & Man-Made Disasters That Could Occur

Fire	Biological Threat
Flood	Nuclear Blast
Tornado	Radiation Threat
Hurricane	Chemical Threat
Blackout	Explosions
Influenza Pandemic	Gunman in Area
Thunderstorm	Winter Storms/Extreme Cold
Landslides/Debris Flow	Extreme Heat
Earthquakes	Volcano/Tsunami

See Policy PDPM 09.12 for individual instructions

Emergency Planning Team

Senior Management and the Office Manager will periodically review this emergency plan and update it for changes in our circumstances. In addition, we will coordinate with our Landlord/Property manager, and neighboring tenants/businesses, to ensure that we can help one another, and coordinate our efforts.

Critical Operations

<u>Operation</u>	<u>Staff In Charge</u>	<u>Action Plan</u>
Notify Staff	Office Manager	Contact and give instructions/post sign on door
Notify Patients	Reception/Scheduling	Contact and give instructions/post sign on door
Secure Office	CEO/Office Manager	Secure premises (locks, windows, HVAC)
Backup data	Office Manager	Only if time to do safely. Take offsite
Locate Temporary Space	CEO	Depending on severity of damage.
Contingency care for patients	CEO	Depending on severity of damage.

The Office Manager will contact our top vendors and contractors, to notify them of issues in the event of an emergency.

Evacuation Plan

AFTER EVACUATION, LOCK ALL DOORS—BOTH FRONT AND BACK

If we must leave the workplace quickly:

Meeting Spot – Approximately 50-75 feet directly in front of the front door (on the other side of the street).

Site Manager – The CEO or the person with the most seniority (see chain of command-Appendix A) should verify all employees and visitors are out of the office and lock the doors upon exit. Then at the meeting spot, he/she needs to take a head count to make sure everyone is accounted for. If the CEO is not present, then contact him/her to inform him/her of the situation. The Site Manager is responsible for giving the “all clear.” Evacuation Procedures will be reviewed once a year.

If you must leave the area permanently – follow the procedures above and then evacuate the area as quickly as possible. The Site Manager should make this determination.

Shelter-In-Place Plan

Site Manager – The CEO or the person with the most seniority (see chain of command- Appendix A) will be the Site Manager. If the CEO is not present, then contact him/her to inform him/her of the situation.

If we must take shelter quickly you should:

1. Give visitors in the office the option to stay or leave—letting them know that their decision is final.
2. After the ones who want to leave exit, shut & lock all doors.
3. Gather emergency supplies and emergency rations of food, if necessary.

4. If the shelter-in-place is due to radioactive, nuclear, biological or a chemical attack, it is important to also seal the doorways. It is best to congregate into an interior room (with access to bathroom if possible) and seal the doorways of that interior room. Use available materials (i.e. duct tape, plastic sheeting, etc.) to seal the doorways.
5. Turn off your HVAC systems.
6. Listen to your radio for any instructions.

The Site Manager is responsible for giving the "all clear." Shelter-In-Place Plan will be reviewed once a year.

Cyber Security

Our Cyber Security has two components relative to our disaster plan: 1) having good cyber security to prevent a breach which could, in itself, be disastrous, and 2) to have strong cyber security and data security relative to a natural/man-made disaster and to ensure that our data is secure if our premises become destroyed.

Senior Management has evaluated the severity our of cyber risks using PDPM 09.14. Through that audit, Senior Management has optimized our cyber security, given our situation.

In the event of an emergency:

1. Make a last minute emergency backup, if safe to wait for it to complete, and remove the backup from the premises.
2. Shutdown and unplug all computers. If the emergency is involving water, lift equipment up onto desktops and cover with plastic sheeting, if safe to do so.
3. Lock the doors to the facility to secure the computers.

Records Back-up

Our key electronic and paper records are backed up and stored offsite, as appropriate. See Appendix C for backup protocol followed for this location.

Patient Continuing Care Contingency Plan

CMS requires that we have a contingency plan with other DPMs/DMEPOS providers to provide ongoing care and follow up care for our established patients in the event our Practice is unable to provide service for these patients from this location. Senior Management will make arrangements with other local offices (including our own temporary offices and/or alternate locations) to provide continuing care in the case that this location becomes unusable, either temporarily or permanently.

Annual Review

A review of this emergency and disaster plan will be done annually.

Quality Assurance and Improvement Program Notes: How can we improve this process? _____

APPENDIX A

CHAIN OF COMMAND IN AN EMERGENCY/DISASTER

Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____	Notes:
Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____	Notes:
Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____	Notes:
Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____	Notes:
Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____	Notes:

APPENDIX B

COMPANY EMERGENCY CONTACT DATA

Emergency: 911 Non-Emergency Police: _____

General Liability Insurance Carrier: _____

Toll Free Number to Report Claims: _____ Policy #: _____

Agent Name: _____ Agent Phone #: _____

Property Manager/LL Name: _____ PM/LL Phone: _____

Other Contact Data: _____

Neighboring Business Name: _____ Neighbor Phone: _____

Other Contact Data: _____

Out of State Contact Name: _____ Contact Phone: _____

Other Contact Data: _____

Employees:

Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____	Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____
Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____	Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____
Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____	Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____

Continued Next Page

APPENDIX B Continued

Continued From Previous Page

Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____	Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____
Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____	Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____
Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____	Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____
Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____	Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____
Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____	Name: _____ Cell Phone: _____ Work Phone: _____ Home Phone: _____ E-mail: _____ Other: _____

APPENDIX C

RECORDS BACKUP PROTOCOL

BACKUP PROTOCOL FOR ELECTRONIC RECORDS, INCLUDING FREQUENCY, AND FREQUENCY DATA IS TAKEN/STORED OFFSITE.
HOW DO WE BACKUP AND ACCESS OUR PATIENT RECORDS IN AN EMERGENCY?
OFFSITE STORAGE OF KEY PAPER RECORDS, INCLUDING LEASES, INSURANCE POLICIES, BANK ACCOUNT DATA, AND PAYROLL AND ACCOUNTING RECORDS.
IF ACCOUNTING AND PAYROLL RECORDS ARE DESTROYED, HOW WOULD WE 1) RECREATE THE DATA, AND 2) PAY THE NEXT PAYROLL AND/OR COMMUNICATE WITH OUR PAYROLL SERVICE.
OTHER

DISASTER INSTRUCTIONS AND TRAINING MATERIALS

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Quality Assurance and Improvement Program Notes: How can we improve this process? _____

Fires

Heat and smoke from fire can be more dangerous than the flames. Inhaling the super-hot air can sear your lungs. Fire produces poisonous gases that make you disoriented and drowsy. Instead of being awakened by a fire, you may fall into a deeper sleep. Asphyxiation is the leading cause of fire deaths, exceeding burns by a three-to-one ratio.

Take Protective Measures

BEFORE A FIRE

Planning Your Escape

- Review escape routes. Practice escaping from each room.
- Make sure windows are not nailed or painted shut. Make sure security gratings on windows have a fire safety opening feature so they can be easily opened from the inside.
- Stay low to the floor (where the air is safer in a fire) when escaping from a fire.

Preventing fire

Flammable Items

- Never use gasoline, benzine, naphtha, or similar flammable liquids indoors.
- Store flammable liquids in approved containers in well-ventilated storage areas.
- Never smoke near flammable liquids.
- Discard all rags or materials that have been soaked in flammable liquids after you have used them. Safely discard them outdoors in a metal container.

Heating Sources

- Be careful when using alternative heating sources, ovens, or heat guns.
- Place heat sources at least three feet away from flammable materials. Make sure the floor and nearby walls are properly insulated.

Electrical Wiring

- Inspect extension cords for frayed or exposed wires or loose plugs.
- Make sure outlets have cover plates and no exposed wiring.
- Make sure wiring does not run under rugs, over nails, or across high-traffic areas.
- Do not overload extension cords or outlets. If you need to plug in two or three appliances, get a UL-approved unit with built-in circuit breakers to prevent sparks and short circuits.
- Make sure insulation does not touch bare electrical wiring.

DURING A FIRE

To escape a fire, you should:

- Check closed doors for heat before you open them. If you are escaping through a closed door, use the back of your hand to feel the top of the door, the doorknob, and the crack between the door and door frame before you open it. Never use the palm of your hand or fingers to test for heat - burning those areas could impair your ability to escape a fire (i.e., ladders and crawling).
 - **Hot Door**
Do not open. Escape through a window. If you cannot escape, hang a white or light-colored sheet outside the window, alerting fire fighters to your presence.
 - **Cool Door**
Open slowly and ensure fire and/or smoke is not blocking your escape route. If your escape route is blocked, shut the door immediately and use an alternate escape route, such as a window. If clear, leave immediately through the door and close it behind you. Be prepared to crawl. Smoke and heat rise. The air is clearer and cooler near the floor.
- Crawl low under any smoke to your exit - heavy smoke and poisonous gases collect first along the ceiling.
- Close doors behind you as you escape to delay the spread of the fire.
- Stay out once you are safely out. Do not reenter. Call 9-1-1.

AFTER A FIRE

The following are guidelines for different circumstances in the period following a fire:

- If you are with burn victims, or are a burn victim yourself, call 9-1-1; cool and cover burns to reduce chance of further injury or infection.
- If you detect heat or smoke when entering a damaged building, evacuate immediately.
- If you are a tenant, contact the landlord.
- If you have a safe or strong box, do not try to open it. It can hold intense heat for several hours. If the door is opened before the box has cooled, the contents could burst into flames.

Note if you are near a wildfire, they spread quickly, igniting brush, trees and buildings. Get to a safe distance immediately and notify authorities. See next topic.

Wildfires

The best way to prepare for wildfires is to mitigate your risk factors ahead of time and to be prepared to evacuate quickly if they occur.

Asses risk of wildfire:

- closeness of building structures and escape roads to woods/forest,
- flammability of building structures,
- types of vegetation within nearby woods/forest,
- amount of unburned fuel within the nearby woods/forest (i.e. time since last controlled burn),
- topography of area (ravines can act like chimneys),
- weather patterns,
- history of fire in area,
- ease of access by fire fighting trucks/emergency personnel,
- present drought conditions

Reduce risk factors ahead of time

- Create a larger barrier between structures and woods/forest.
- Incorporate improved fire-proofing of building supplies/structures.
- Ensure that emergency services can access the area.
- Coordinate with emergency and forest services to assess risks and plan abatement strategies.
- Have backup copies of key documents stored offsite.

Plan an escape ahead of time

- Notice systems—know how you can find out if a fire has started.
- Plan escape paths and assess their ability to be blocked—should have multiple options pre-determined.
- Have emergency kits packed and ready to go when fire risks are highest.
- Make a list of cherished valuables to try to save. You may have no more than minutes to collect them.
- Have a communication strategy and pre-determined meeting place so that family and loved ones separated during an evacuation know how to find one another.

Thunderstorms

Preparing for a Thunderstorm and Lightning

- Familiarize yourself with the terms that are used to identify a thunderstorm hazard, including understanding the difference between a severe thunderstorm watch and a severe thunderstorm warning.
- A thunder storm watch means there is a possibility of a thunderstorm in your area.
- A thunder storm warning means a thunderstorm is occurring or will likely occur soon. If you are advised to take shelter do so immediately.
- Use the 30/30 lightning safety rule. If you see lightning and you cannot count to 30 before hearing thunder, go indoors. Then stay indoors for 30 minutes after hearing the last clap of thunder.
- Listen to the radio for more weather-related information.
- SHUT DOWN AND UNPLUG ALL COMPUTERS (upload credit cards and/or transmit first, if you have time to safely do so). UNPLUG APPLIANCES.

Have a Thunderstorm Plan

- If a thunderstorm is likely in your area, postpone outdoor activities.
- Secure outdoor objects that could blow away or cause damage.
- Watch for darkening skies, lightning, increasing winds.
- Listen to the radio for information.
- Go quickly inside a home, building, or hard top automobile, if possible.
- If shelter is not available go to the lowest area nearby and make yourself the smallest target possible but do not lie flat on the ground.
- Things to avoid include—tall, isolated tree in an open area, hilltops, open fields, and anything metal.

Stay Informed

- Local authorities may not immediately be able to provide information on what is happening and what you should do. However, you should listen to the radio often for official news and instructions as they become available.
- Do not use electrical items such as computers as power surges from lightning can cause serious damage.
- A corded telephone should only be used in an emergency, but cordless phones and cell phones are safe to use.

Floods

Prepare for Flooding

- If feasible, construct barriers to stop floodwater from entering the building.
- Familiarize yourself with the terms that are used to identify a thunderstorm hazard, including understanding the difference between a severe thunderstorm watch and a severe thunderstorm warning.
 - A **flood watch** or **flash flood watch** means there is a possibility of flooding or a flash flood in your area.
 - Be prepared to evacuate.
 - SHUT DOWN AND UNPLUG ALL COMPUTERS (upload credit cards and/or transmit data first, if you have time to safely do so). Move equipment to higher levels.
 - Unplug electrical appliances, moving them to higher levels, if possible. However, do not touch an electric appliance if you are wet or standing in water.
 - A **flood warning** means a flood is occurring or will likely occur soon. If you are advised to evacuate do so immediately.
 - A **flash flood warning** means a flash flood is occurring. Seek higher ground immediately; do not wait for instructions.
- Listen to the radio for more weather-related information.

Plan to Evacuate

- Plan how you will leave and where you will go if you are advised to evacuate.
- If you do not have a car, plan alternate means of evacuating.
- Become familiar with alternate routes and other means of transportation out of your area.
- Lock the door behind you.
- Listen to the radio for information.
- Do not walk through moving water, if possible. Look for areas where the water is not moving. What might seem like a small amount of moving water can easily knock you down.
- Do not drive into flooded areas. If your vehicle becomes surrounded by rising water, get out quickly and move to higher ground, if possible.

Tornadoes

Prepare for a Tornado

- Familiarize yourself with the terms that are used to identify a tornado hazard.
 - A **tornado watch** means a tornado is possible in your area. You should monitor the radio for the latest developments.
 - A **tornado warning** is when a tornado is actually occurring, take shelter immediately.
- Determine in advance where you will take shelter in case of a tornado warning.
 - Storm cellars or basements provide the best protection.
 - If underground shelter is not available, go into an interior room or hallway on the lowest floor possible.
 - Stay away from windows, doors and outside walls. Go to the center of the room. Stay away from corners because they attract debris.
 - Plan to go quickly to a building with a strong foundation, if possible.
 - If shelter is not available, lie flat in a ditch or other low-lying area. Do not get under an overpass or bridge. You are safer in a low, flat location.
 - Plan to stay in the shelter location until the danger has passed.
 - SHUT DOWN AND UNPLUG ALL COMPUTERS (upload credit cards and poll first, if you have time to safely do so). UNPLUG APPLIANCES.

Plan to Take Shelter

- If local authorities issue a tornado warning or if you see a funnel cloud. Take shelter immediately.
- Local authorities may not immediately be able to provide information on what is happening and what you should do. However, you should listen to the radio for official news and instructions as they become available.
- Stay in the shelter location until the danger has passed.
- After a tornado be sure to remain out of damaged buildings and stay clear of downed power lines.

Hurricanes

Prepare for Hurricanes

- Familiarize yourself with the terms that are used to identify a hurricane.
 - A **hurricane watch** means a hurricane is possible in your area. Be prepared to evacuate. Monitor the radio for the latest developments.
 - A **hurricane warning** is when a hurricane is expected in your area. If local authorities advise you to evacuate, leave immediately.
 - Cover all of windows with pre-cut ply wood to protect your windows from high winds.
 - Plan to bring in all outdoor signage, etc.
 - Lock the door.
 - SHUT DOWN AND UNPLUG ALL COMPUTERS (upload credit cards and/or transmit data first, if you have time to safely do so). UNPLUG APPLIANCES.

Plan to Evacuate

- Plan how you will leave and where you will go if you are advised to evacuate.
- If you do not have a car, plan alternate means of evacuating.
- If you have a car, keep a half tank of gas in it at all times in case you need to evacuate.
- Become familiar with alternate routes and other means of transportation out of your area.
- Lock the door behind you.
- If you are not able to evacuate, stay indoors away from all windows. Take shelter in an interior room with no windows if possible. Be aware that there may be a sudden lull in the storm as the eye of the hurricane moves over. Stay in your shelter until local authorities say it is safe.
- Be alert for tornadoes and flooding. If you see a funnel cloud or if local authorities issue a tornado warning take shelter underground, if possible or in an interior room away from windows. If waters are rising quickly or local authorities issue a flash flood warning, seek higher ground.
- Stay away from downed power lines to avoid the risk of electric shock or electrocution.
- Do not return to your home until local authorities say that it is safe to do so. Even after the hurricane and after flood waters recede, roads may be weakened and could collapse. Buildings may be unstable, and drinking water may be contaminated. Use common sense and exercise caution.

Winter Storms and Extreme Cold

Winter storms can result in flooding, storm surge, closed highways, blocked roads, downed power lines and hypothermia.

Prepare for Winter Storms and Extreme Cold

- Familiarize yourself with the terms that are used to identify a hurricane.
 - **Freezing Rain** is rain that freezes when it hits the ground, creating a coating of ice on roads, walkways, trees and power lines.
 - **Sleet** is rain that turns to ice pellets before reaching the ground. Sleet also causes moisture on roads to freeze and become slippery.
 - **Winter Storm Watch** means a winter storm is possible in your area. Monitor the radio for the latest developments
 - **Winter Storm Warning** means a winter storm is occurring or will soon occur in your area.
 - **Blizzard Warning** means sustained winds or frequent gusts to 35 miles per hour or greater and considerable amounts of falling or blowing snow are expected to prevail for a period of three hours or longer.
 - **Frost/Freeze Warning** means below freezing temperatures are expected.

Plan Ahead

- Have on hand rock salt to melt ice on walkways, sand to improve traction and snow shovels and other snow removal equipment.
- Dress for the weather
 - Wear several layers of loose fitting, lightweight, warm clothing rather than one layer of heavy clothing. The outer garments should be tightly woven and water repellent.
 - Wear mittens, which are warmer than gloves.
 - Wear a hat.
 - Cover your mouth with a scarf to protect your lungs.
- During a Winter Storm
 - Listen to your radio
 - Eat regularly and drink ample fluids, but avoid caffeine and alcohol
 - Avoid overexertion when shoveling snow. Overexertion can bring on a heart attack. If you must shovel snow, stretch before going outside.
 - Watch for signs of frostbite. These include loss of feeling and white or pale appearance in extremities such as fingers, toes, ear lobes, and the tip of the nose. If symptoms are detected, get medical help immediately.
 - Watch for signs of hypothermia. These include uncontrollable shivering, memory loss, disorientation, incoherence, slurred speech, drowsiness, and apparent exhaustion. If symptoms of hypothermia are detected, get the victim to a warm location, remove wet clothing, warm the center of the body first, and give warm, non-alcoholic beverages if the victim is conscious. Get medical help as soon as possible.
 - Drive only if it is absolutely necessary. If you must drive, travel in the day, do not travel alone, keep others informed of your schedule, and stay on the main roads.

Extreme Heat

Heat kills by pushing the human body beyond its limits. In extreme heat and high humidity, evaporation is slowed and the body must work extra hard to maintain a normal temperature. Conditions that can induce heat-related illnesses include stagnant atmospheric conditions and poor air quality. Consequently, people living in urban areas may be at greater risk from the effects of a prolonged heat wave than those living in rural areas.

Prepare for Extreme Heat

- Familiarize yourself with the terms that are used to identify a hurricane.
 - **Heat Wave** means prolonged period of excessive heat, often combined with excessive humidity.
 - **Heat Index** means a number in degrees Fahrenheit that tells how hot it feels when relative humidity is added to the air temperature. Exposure to full sunshine can increase the heat index by 15 degrees.
 - **Heat Cramps** are muscular pains and spasms due to heavy exertion. Although heat cramps are the least severe, they are often the first signal that the body is having trouble with the heat.
 - **Heat Exhaustion** typically occurs when people exercise heavily or work in a hot, humid place where the body fluids are lost through heavy sweating. Blood flow to the skin increases, causing blood flow to decrease to the vital organs. This results in a form of mild shock. If not treated, the victim's condition will worsen. Body temperature will keep rising and the victim may suffer heat stroke.
 - **Heat stroke** is a life threatening condition. The victim's temperature control system, which produces sweating to cool the body, stops working. The body temperature can rise so high that brain damage and death may result if the body is not cooled quickly. This can also be referred to as Sun Stroke.

Plan Ahead

- Stay indoors as much as possible and limit exposure to the sun.
- Consider spending the warmest part of the day in public buildings. Circulating air can cool the body by increasing the perspiration rate of evaporation.
- Eat well-balanced, light and regular meals. Avoid using salt tablets unless directed to do so by a physician.
- Drink plenty of water. Persons who have epilepsy or heart, kidney, or liver disease; are on fluid-restricted diets; or have a problem with fluid retention should consult a doctor before increasing fluid intake.
- Limit intake of alcoholic beverages.
- Dress in loose-fitting, lightweight, and light-colored clothes that cover as much skin as possible.
- Protect face and head by wearing a wide-brimmed hat.
- Avoid strenuous work during the warmest part of the day.

First Aid for Heat-Induced Illnesses

Condition	Symptoms	First Aid
Sunburn	Skin redness and pain, possible swelling, blisters, fever, headaches	<ol style="list-style-type: none"> 1. Take a shower using soap to remove oils that may block pores, preventing the body from cooling naturally. 2. Apply dry, sterile dressings to any blisters, and get medical attention.
Heat Cramps	Painful spasms, usually in leg and abdominal muscles; heavy sweating	<ol style="list-style-type: none"> 1. Get the victim to a cooler location. 2. Lightly stretch and gently massage affected muscles to relieve spasms. 3. Give sips of up to a half glass of cool water every 15 minutes. (Do not give liquids with caffeine or alcohol.) 4. Discontinue liquids, if victim is nauseated.
Heat Exhaustion	Heavy sweating but skin may be cool, pale, or flushed. Weak pulse. Normal body temperature is possible, but temperature will likely rise. Fainting or dizziness, nausea, vomiting, exhaustion, and headaches are possible.	<ol style="list-style-type: none"> 1. Get victim to lie down in a cool place. 2. Loosen or remove clothing. 3. Apply cool, wet clothes. 4. Fan or move victim to air-conditioned place. 5. Give sips of water if victim is conscious. 6. Be sure water is consumed slowly. 7. Give half glass of cool water every 15 minutes. 8. Discontinue water if victim is nauseated. 9. Seek immediate medical attention if vomiting occurs.
Heat Stroke (a severe medical emergency)	High body temperature (105+); hot, red, dry skin; rapid, weak pulse; and rapid shallow breathing. Victim will probably not sweat unless victim was sweating from recent strenuous activity. Possible unconsciousness.	<ol style="list-style-type: none"> 1. Call 9-1-1 or emergency medical services, or get the victim to a hospital immediately. Delay can be fatal. 2. Move victim to a cooler environment. 3. Removing clothing 4. Try a cool bath, sponging, or wet sheet to reduce body temperature. 5. Watch for breathing problems. 6. Use extreme caution. 7. Use fans and air conditioners.

Landslides and Debris Flow

In a landslide, masses of rock, earth or debris move down a slope. Landslides may be small or large, slow or rapid. They are activated by storms, earthquakes, volcanic eruptions, fires, and human modification of land. They can travel several miles from their source, growing in size as they pick up trees, boulders, cars, and other materials.

Recognize Landslide Warning Signs

- Changes occur in your landscape such as patterns of storm-water drainage on slopes land movement, small slides, flows, or progressively leaning trees.
- Doors or windows stick or jam for the first time.
- New cracks appear in plaster, tile, brick, or foundations.
- Outside walls, walks, or stairs begin pulling away from the building.
- Slowly developing, widening cracks appear on the ground or on paved areas such as streets or driveways.
- Underground utility lines break.
- Bulging ground appears at the base of a slope.
- Water breaks through the ground surface in new locations.
- Fences, retaining walls, utility poles, or trees tilt or move.
- A faint rumbling sound that increases in volume is noticeable as the landslide nears.
- The ground slopes downward in one direction and may begin shifting in that direction under your feet.
- Unusual sounds, such as trees cracking or boulders knocking together, might indicate moving debris.
- Collapsed pavement, mud, fallen rocks, and other indications of possible debris flow can be seen when driving.

During a Landslide or Debris Flow

- Move away from the path of a landslide or debris flow as quickly as possible.
- Curl into a tight ball and protect your head if escape is not possible.

After a Landslide or Debris Flow

- Stay away from the slide area. There may be danger of additional slides.
- Check for injured and trapped persons near the slide, without entering the direct slide area. Direct rescuers to their locations.
- Watch for associated dangers such as broken electrical, water, gas, and sewage lines and damaged roadways and railways.
- Replant damaged ground as soon as possible since erosion caused by loss of ground cover can lead to flash flooding and additional landslides in the near future.

Earthquakes

Prepare for Earthquakes

- Familiarize yourself with the terms that are used to identify an earthquake.
 - **Earthquake** means a sudden slipping of movement of a portion of the earth's crust, accompanied and followed by a series of vibrations.
 - **Aftershock** means an earthquake of similar or lesser intensity that follows the main earthquake.
 - **Fault** is the fracture across which displacement has occurred during an earthquake. The slippage may range from less than an inch to more than 10 yards in a severe earthquake.
 - **Epicenter** is the place on the earth's surface directly above the point on the fault where the earthquake rupture began. Once fault slippage begins, it expands along the fault during the earthquake and can extend hundreds of miles before stopping.
 - **Seismic Waves** are vibrations that travel outward from the earthquake fault at speeds of several miles per second. Although fault slippage directly under a structure can cause considerable damage, the vibrations of seismic waves cause most of the destruction during earthquakes.
 - **Magnitude** is the amount of energy released during an earthquake, which is computed from the amplitude of the seismic waves.

Before an Earthquake

- Place large or heavy objects on lower shelves.
- Store bottled foods, glass, china, and other breakables on low shelves or in cabinets that fasten shut.
- Locate safe spots in each room under a sturdy table or against an inside wall. Reinforce this information by moving to these places during drills.

During an Earthquake

Minimize your movements during an earthquake to a few steps to a nearby safe place. Stay indoors until the shaking has stopped and you are sure exiting is safe.

After an Earthquake

- Be prepared for aftershocks. These secondary shockwaves are usually less violent than the main quake but can be strong enough to do additional damage to weakened structures.
- Open cabinets cautiously. Beware of objects that can fall off shelves.
- Stay away from damaged areas unless your assistance has been specifically requested by police, fire, or relief organizations.
- Be aware of possible tsunamis if you live in coastal areas. These are also known as seismic sea waves (mistakenly called "tidal waves"). When local authorities issue a tsunami warning, assume that a series of dangerous waves is on the way. Stay away from the beach.

If you are	Then:
Indoors	Take cover under a sturdy desk, table, or bench or against an inside wall, and hold on. If there isn't a table or desk near you, cover your face and head with your arms and crouch in an inside corner of the building.

	<p>Stay away from glass, windows, outside doors and walls, and anything that could fall, such as lighting fixtures or furniture.</p> <p>Stay in bed - if you are there when the earthquake strikes - hold on and protect your head with a pillow, unless you are under a heavy light fixture that could fall. In that case, move to the nearest safe place.</p> <p>Use a doorway for shelter only if it is in close proximity to you and if you know it is a strongly supported, load bearing doorway.</p> <p>Stay inside until shaking stops and it is safe to go outside. Most injuries during earthquakes occur when people are hit by falling objects when entering into or exiting from buildings.</p> <p>Be aware that the electricity may go out or the sprinkler systems or fire alarms may turn on.</p> <p>DO NOT use the elevators.</p>
Outdoors	<p>Stay there.</p> <p>Move away from buildings, streetlights, and utility wires.</p>
In a moving vehicle	<p>Stop as quickly as safety permits and stay in the vehicle. Avoid stopping near or under buildings, trees, overpasses, and utility wires.</p> <p>Proceed cautiously once the earthquake has stopped, watching for road and bridge damage.</p>
Trapped under debris	<p>Do not light a match. Do not move about or kick up dust.</p> <p>Cover your mouth with a handkerchief or clothing.</p> <p>Tap on a pipe or wall so rescuers can locate you. Use a whistle if one is available. Shout only as a last resort - shouting can cause you to inhale dangerous amounts of dust.</p>

Blackouts

The biggest Blackout in U.S. history occurred on August 14, 2003, leaving roughly 50 million people without power. Blackouts can happen anywhere, and to anyone, so being prepared is important.

The best way to prepare for any emergency, including Blackouts, is to stay calm and stay informed by listening to a battery powered radio for important information from local officials.

Gunman In The Area

If there is a report of gunman in your area, lock the door and do not let anyone in until you have been given the all clear.

Influenza Pandemic

A pandemic is a global disease outbreak. An influenza pandemic occurs when a new influenza A virus emerges for which there is little or no immunity in the human population and the virus begins to cause serious illness and then spreads easily person-to-person worldwide. The federal government, states, communities and industry are taking steps to prepare for and respond to an influenza pandemic.

If a pandemic occurs, it is likely to be a prolonged and widespread outbreak that could require temporary changes in many areas of society, such as schools, work, transportation and other public services. An informed and prepared public can take appropriate actions to decrease their risk during a pandemic. To be prepared for such an emergency, the U.S Department of Health and Human Services encourages individuals, businesses and communities to:

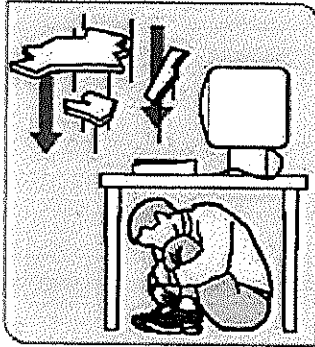
- Talk with your local public health officials and health care providers, who can supply information about the signs and symptoms of a specific disease outbreak and recommend prevention and control actions.
- Adopt business/school practices that encourage sick employees/students to stay home and anticipate how to function with a significant portion of the workforce/school population absent due to illness or caring for ill family members.
- Keep a short-term emergency fund equal to three months' salary in savings.
- Practice good health habits, including eating a balanced diet, exercising daily, and getting sufficient rest. In addition, take common-sense steps to stop the spread of germs including frequent hand washing, covering coughs and sneezes and staying away from others as much as possible when you are sick.
- Stay informed about pandemic influenza and be prepared to respond. Consult www.pandemicflu.gov frequently for updates on national and international information on pandemic influenza.

Explosions

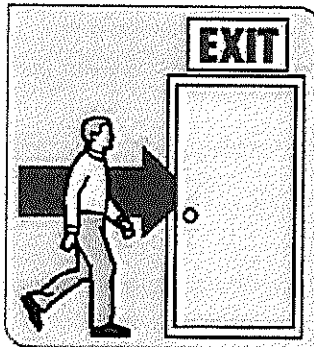
BE INFORMED

EXPLOSIONS

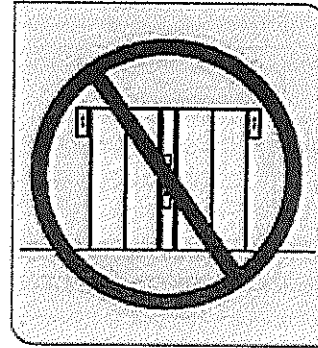
If there is an explosion...



1. Take shelter against your desk or a sturdy table.



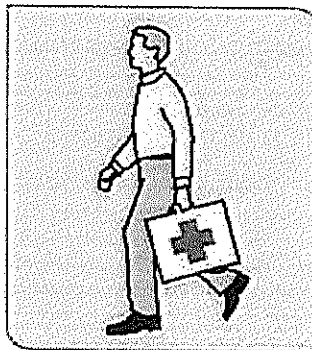
2. Exit the building as quickly as possible.



3. Do not use elevators.



4. Check for fire and other hazards.



5. Take your emergency kit if time allows.

EXPLOSIONS CONTINUED

BE INFORMED **EXPLOSIONS** **If there is fire...**



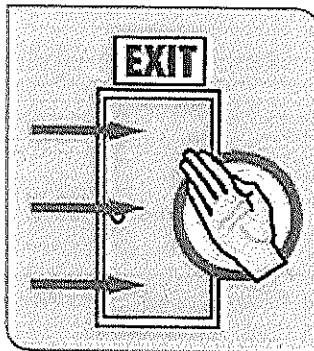
1. Exit the building as quickly as possible.



2. Crawl low in smoke.



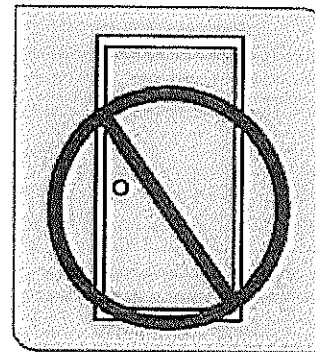
3. Use a wet cloth to cover your nose and mouth.



4. Use the back of your hand to feel the lower, middle, and upper parts of closed doors.



5. If the door is not hot, brace yourself against the door and open it slowly.

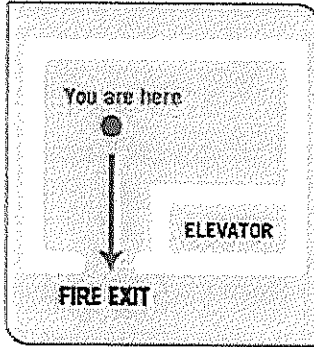


6. Do not open the door if it is hot. Look for another way out.

EXPLOSIONS CONTINUED

BE INFORMED

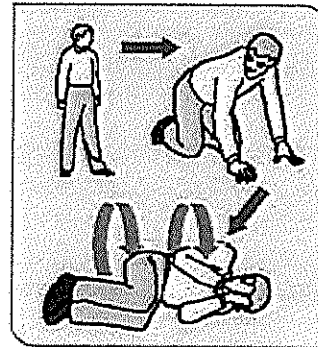
EXPLOSIONS If there is fire...



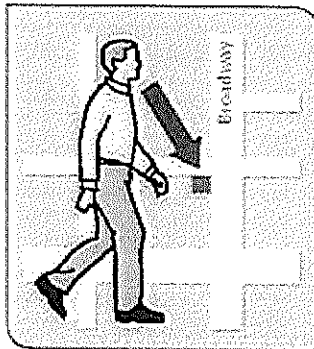
7. Use appropriate fire exits, not elevators.



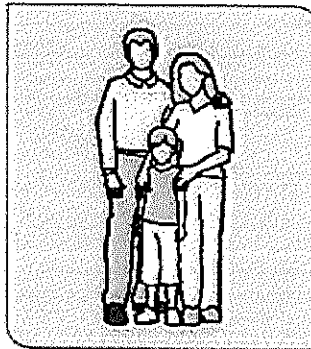
8. If you catch fire, do not run!



9. Stop, Drop and Roll.



10. If you are at home, go to previously designated meeting place.



11. Account for your family members.



12. Do not go back into a burning building and carefully supervise small children.

EXPLOSIONS CONTINUED

BE INFORMED

EXPLOSIONS If there is fire...

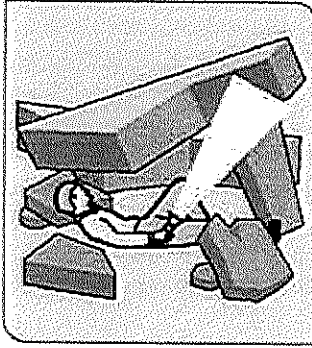


13. Call the fire department.

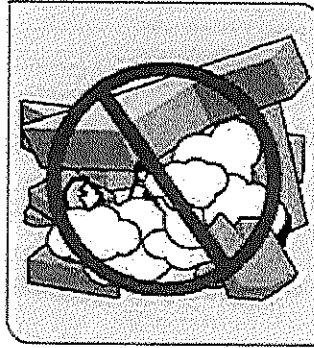
EXPLOSIONS CONTINUED

**BE INFORMED
EXPLOSIONS**

If you are trapped in debris...



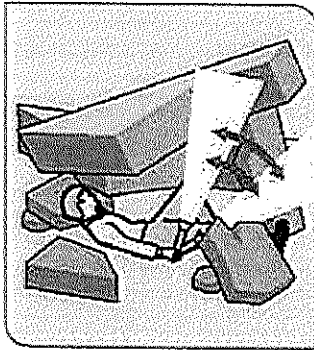
1. If possible, use a flashlight to signal your location.



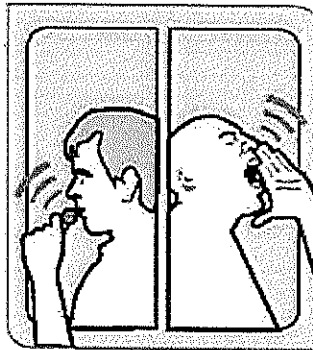
2. Avoid unnecessary movement so that you don't kick up dust.



3. Cover your mouth and nose with anything you have on hand. Dense weave cotton material can create a good filter. Try to breathe through the material.



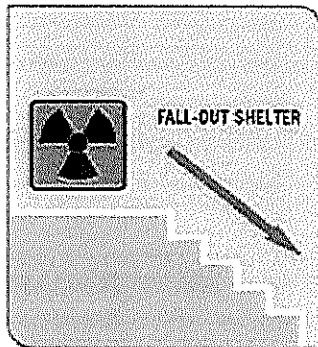
4. Tap on a pipe or wall so that rescuers can hear where you are.



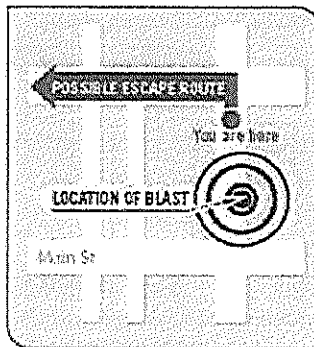
5. Use a whistle if one is available. Shout only as a last resort - shouting can cause a person to inhale dangerous amounts of dust.

NUCLEAR BLAST

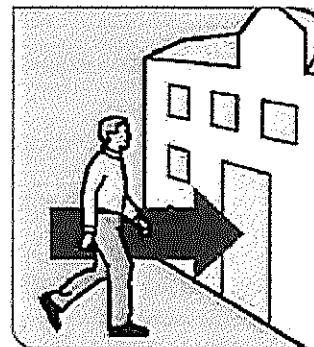
BE INFORMED NUCLEAR BLAST



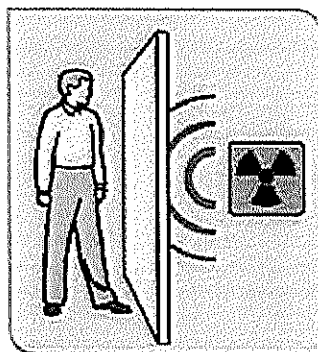
1. Take cover immediately, below ground if possible, though any shield or shelter will help protect you from the immediate effects of the blast and the pressure wave.



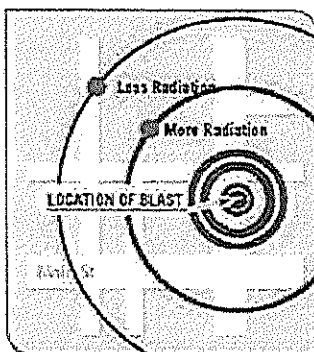
2. Consider if you can get out of the area;



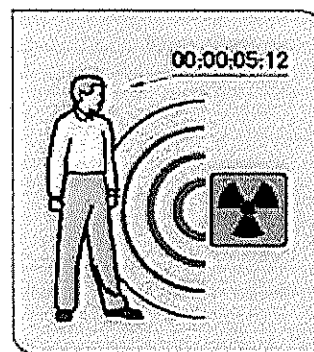
3. Or if it would be better to go inside a building and follow your plan to "shelter-in-place".



4. **Shielding:** If you have a thick shield between yourself and the radioactive materials more of the radiation will be absorbed, and you will be exposed to less.



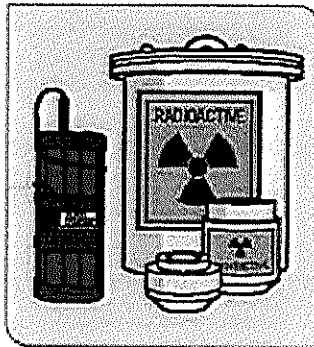
5. **Distance:** The farther away from the blast and the fallout the lower your exposure.



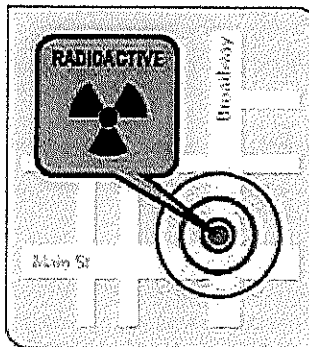
6. **Time:** Minimize time spent exposed will also reduce your risk.

RADIATION THREAT

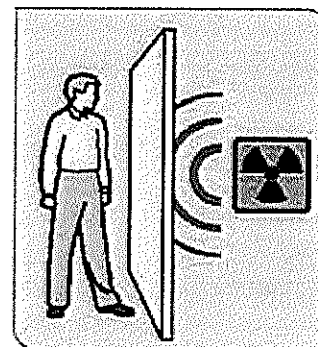
BE INFORMED RADIATION THREAT



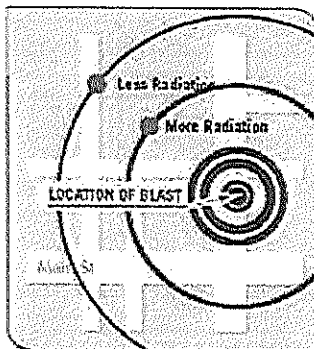
1. A radiation threat or "Dirty Bomb" is the use of common explosives to spread radioactive materials.



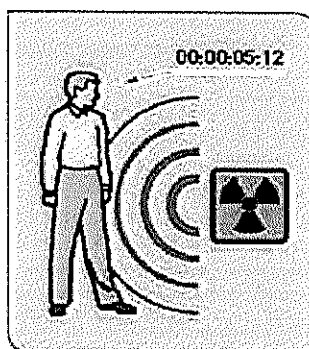
2. It is not a nuclear blast. The force of the explosion and radioactive contamination will be more localized. In order to limit the amount of radiation you are exposed to, think about shielding, distance and time.



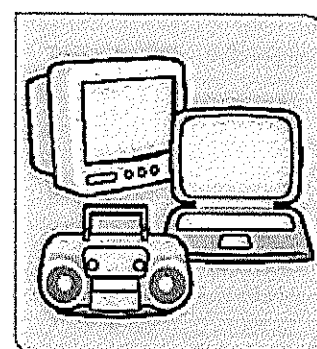
3. **Shielding:** If you have a thick shield between yourself and the radioactive materials more of the radiation will be absorbed by the thick shield, and you will be exposed to less.



4. **Distance:** The farther away you are from the radiation the lower your exposure.



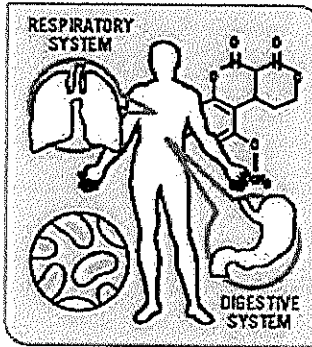
5. **Time:** Minimizing time spent exposed will also reduce your risk.



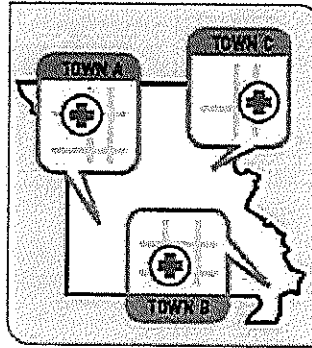
6. Local authorities may not be able to immediately provide information on what is happening and what you should do. However, you should watch TV, listen to the radio, or check the Internet often for official news and information as it becomes available.

BIOLOGICAL THREAT

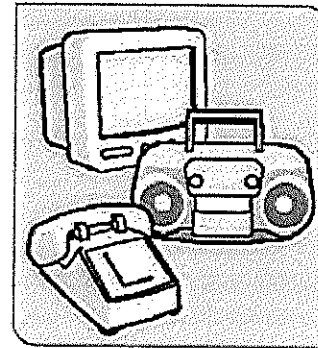
BE INFORMED BIOLOGICAL THREAT



1. A biological attack is the release of germs or other biological substances. Many agents must be inhaled, enter through a cut in the skin or be eaten to make you sick. Some biological agents can cause contagious diseases, others do not.



2. A biological attack may or may not be immediately obvious. While it is possible that you will see signs of a biological attack it is perhaps more likely that local health care workers will report a pattern of unusual illness.



3. You will probably learn of the danger through an emergency radio or TV broadcast.



4. If you become aware of an unusual or suspicious release of an unknown substance nearby, it doesn't hurt to protect yourself.



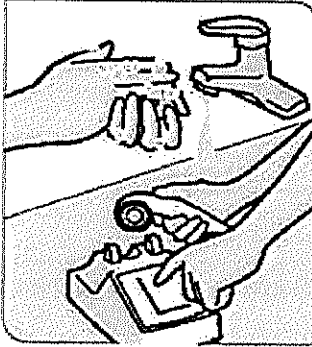
5. Get away from the substance as quickly as possible.



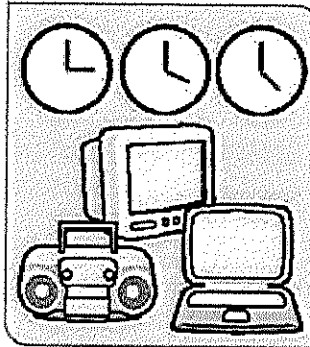
6. Cover your mouth and nose with layers of fabric that can filter the air but still allow breathing.

BIOLOGICAL THREAT CONTINUED

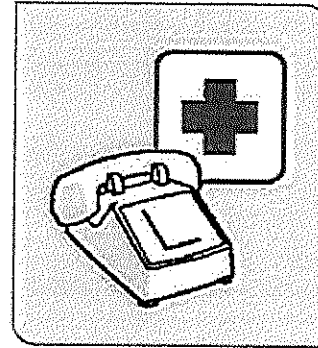
BE INFORMED
BIOLOGICAL THREAT



7. Wash with soap and water and contact authorities.



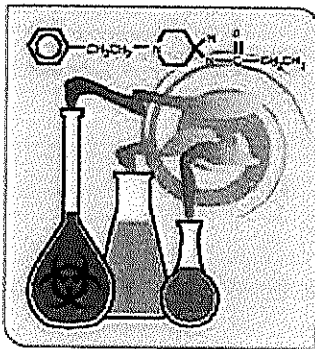
8. In the event of a biological attack, public health officials may not immediately be able to provide information on what you should do. However, you should watch TV, listen to the radio, or check the Internet for official news as it becomes available.



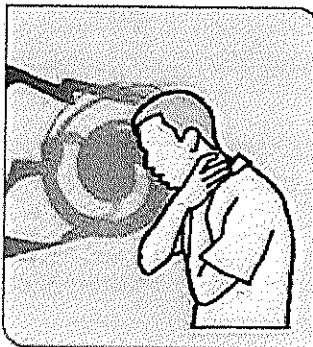
9. At the time of a declared biological emergency be suspicious, but do not automatically assume that any illness is the result of the attack. Symptoms of many common illnesses may overlap. Use common sense, practice good hygiene and cleanliness to avoid spreading germs, and seek medical advice.

CHEMICAL THREAT

BE INFORMED CHEMICAL THREAT



1. A chemical attack is the deliberate release of a toxic gas, liquid or solid that can poison people and the environment.



2. Watch for signs such as many people suffering from watery eyes, twitching, choking, having trouble breathing or losing coordination.



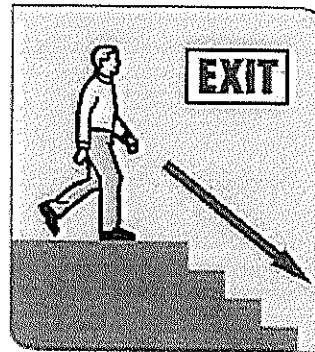
3. Many sick or dead birds, fish or small animals are also cause for suspicion.



4. If you see signs of a chemical attack, quickly try to define the impacted area or where the chemical is coming from, if possible.



5. Take immediate action to get away from any sign of a chemical attack.



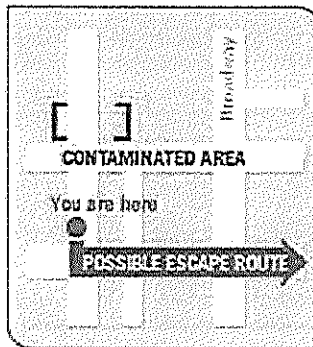
6. If the chemical is inside a building where you are, try to get out of the building without passing through the contaminated area, if possible.

CHEMICAL THREAT CONTINUED

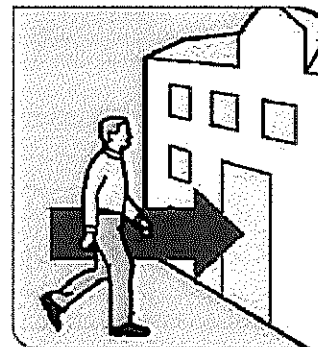
BE INFORMED
CHEMICAL THREAT



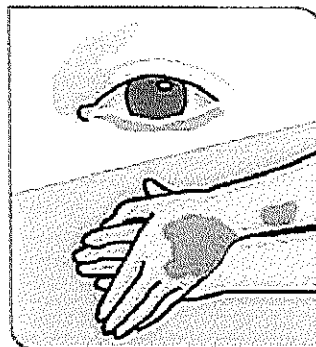
7. Otherwise, it may be better to move as far away from where you suspect the chemical release is and "shelter-in-place."



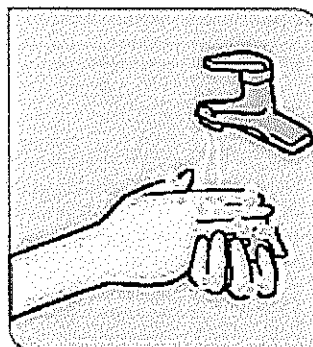
8. If you are outside when you see signs of a chemical attack, you must quickly decide the fastest way to get away from the chemical threat.



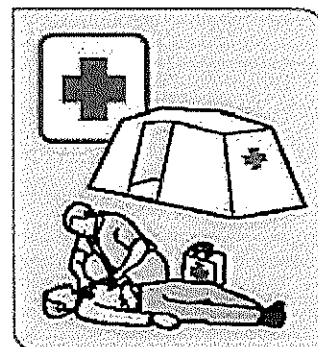
9. Consider if you can get out of the area or if it would be better to go inside a building and follow your plan to "shelter-in-place."



10. If your eyes are watering, your skin is stinging, you are having trouble breathing or you simply think you may have been exposed to a chemical, immediately strip and wash. Look for a hose, fountain, or any source of water.



11. Wash with soap and water, if possible, but do not scrub the chemical into your skin.



12. Seek emergency medical attention.

Tsunamis

Tsunamis, also known as seismic waves are a series of enormous waves created by an underwater disturbance such as an earthquake, landslide, volcanic eruption, or meteorite. A tsunami can move hundreds of miles per hour in the open ocean and smash into land with waves as high as 100 feet or more.

Prepare for Tsunamis

- Familiarize yourself with the terms that are used to identify a tsunami.
 - **Advisory** means an earthquake has occurred in the Pacific basin, which might generate a tsunami.
 - **Watch** means a tsunami was or may have been generated, but is at least two hours travel time to the area in Watch status.
 - **Warning** means a tsunami was, or may have been generated, which could cause damage; therefore, people in the warned area are strongly advised to evacuate.
 - **Epicenter** is the place on the earth's surface directly above the point on the fault where the earthquake rupture began. Once fault slippage begins, it expands along the fault during the earthquake and can extend hundreds of miles before stopping.

During a Tsunami

- Turn on your radio to learn if there is a tsunami warning if an earthquake occurs and you are in a coastal area.
- Move inland to higher ground immediately and stay there.

CAUTION - If there is noticeable recession in water away from the shoreline this is nature's tsunami warning and it should be heeded. You should move away immediately.

After a Tsunami

- Stay away from flooded and damaged areas until officials say it is safe to return.
- Stay away from debris in the water; it may pose a safety hazard to boats and people.

Volcanoes

A volcano is a vent through which molten rock escapes to the earth's surface. When pressure from gases with the molten rock becomes too great, an eruption occurs.

Prepare for a Volcanic Eruption

- Add a pair of goggles and disposable breathing mask for each member of the family to your disaster supply kit.
- Stay away from active volcano sites

During a Volcanic Eruption

- Evacuate immediately from the volcano area to avoid flying debris, hot gases, lateral blast, and lava flow.
- Be aware of mudflows. The danger from a mudflow increases near stream channels and with prolonged heavy rains. Mudflows can move faster than you can walk or run. Look upstream before crossing a bridge, and do not cross the bridge if mudflow is approaching.
- Avoid river valleys and low-lying areas.

Protection from Falling Ash

- Wear long-sleeved shirts and long pants. Use goggles and wear eyeglasses instead of contact lenses.
- Use a dust mask or hold a damp cloth over your face to help with breathing.
- Stay away from areas downwind from the volcano to avoid volcanic ash.
- Stay indoors until the ash has settled unless there is a danger of the roof collapsing.
- Close doors, windows, and all ventilation in the house (chimney vents, furnaces, air conditioners, fans, and other vents).
- Clear heavy ash from flat or low-pitched roofs and rain gutters.
- Avoid running car or truck engines. Driving can stir up volcanic ash that can clog engines, damage moving parts, and stall vehicles.
- Avoid driving in heavy ash fall unless absolutely required. If you have to drive, keep speed down to 35 MPH or slower.

Emergency Supplies Checklist

The Practice provides some of these supplies (first aid kits, duct tape, etc.), but the balance need to be supplies by individual employees for their needs.

Recommended emergency supplies include the following:

- Water, amounts for portable kits will vary. Individuals should determine what amount they are able to both store comfortably and to transport to other locations. If it is feasible, store one gallon of water per person per day, for drinking and sanitation
- Food, at least a three-day supply of non-perishable food
- Battery-powered radio and extra batteries
- Flashlight and extra batteries
- First Aid kit
- Whistle to signal for help
- Dust or filter masks, readily available in hardware stores, which are rated based on how small a particle they filter
- Moist towelettes for sanitation
- Wrench or pliers to turn off utilities
- Can opener for food (if kit contains canned food)
- Plastic sheeting and duct tape to "seal the room"
- Garbage bags and plastic ties for personal sanitation

CYBER SECURITY AUDIT CHECKLIST

According to the November, 2006 CPA Technology Advisor, nearly half of small businesses never reopen following a major loss of data. This cyber security audit is a management tool for Senior Management to ensure that cyber security and data integrity are appropriately addressed for the Practice.

ALL COMPUTER SYSTEMS

	WORST PRACTICES	Ranking	BEST PRACTICES
<u>IT Support from Experts.</u>	No relationship/ try to do everything in-house.	1 2 3 4 5	Relationship with a reputable local firm who regularly maintains the network and software and checks for cyber security issues.
<u>Limit/Control Physical Access to Computers</u>	Lax physical constraints; no locks on office doors; computers in patient rooms not protected; unattended computers can be accessed.	1 2 3 4 5	Keep computers behind locked doors and only allow authorized users to access them. Screensavers should be password protected. Control laptops.
<u>Password Protected User Logins.</u>	General users; wide-open permissions; no screensavers; no logout at night.	1 2 3 4 5	All users should have a unique user accounts and logins. Permission granted should be on "need-to-access" basis. Limit file sharing. Logout at night.
<u>Strong Passwords</u>	Weak passwords used, like names, name of practice, or the default password that shipped with the system.	1 2 3 4 5	Use passwords that are a series of numbers and letters and upper and lower case and are hard to decipher. (see FN 1) Change passwords frequently
<u>Security Patches</u>	Continue to run on the original version of software, without applying security and bug fixes.	1 2 3 4 5	IT staff update regularly or set operating software to auto-update for security patches. Regularly patch all other software.
<u>Loading of Software</u>	Software freely downloaded and installed.	1 2 3 4 5	No software is loaded or downloaded onto systems without proper authorization and complete understanding of its purpose and legitimacy.
<u>Virus Protection</u>	No software; or software loaded, but expired/out-of-date; or software disabled; or irregular frequency of scanning.	1 2 3 4 5	Virus protection software loaded and automatically updated on all computers. Regular scheduled scans run of all hard drives and new files scanned.
<u>Program Disks</u>	Original disks stored onsite. Provides no protection against destruction of premises.	1 2 3 4 5	Original copies of purchased software and operating systems stored offsite with backup disks made and stored onsite.
<u>Surge Suppressors/ Battery Backup</u>	Computers plugged straight into wall. No battery backup.	1 2 3 4 5	All hardware plugged into surge suppressors with battery backup.
<u>Frequent Data Backup. Copies Store Offsite</u>	No backups; or backups kept onsite, which would provide no protection if the premises were destroyed.	1 2 3 4 5	Regular and frequent data backup with copies stored offsite. Can use an online service or tapes/DVDs.

FN 1: Try using an easy to remember sentence and taking the first character of each: ***We make the patient feel like number 1*** would be ***Wmtpfn1***.

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FOR SYSTEMS CONNECTED TO THE INTERNET

	WORST PRACTICES	Ranking	BEST PRACTICES
<u>Firewalls</u>	No firewalls exist.	1 2 3 4 5	Hardware or software firewalls protect the network, especially from the Internet. Settings have been made by professionals with the knowledge to protect the network.
<u>Spam Filters</u>	No spam filtering	1 2 3 4 5	Spam filters loaded on e-mail systems to protect the network from known malicious e-mail traffic and/or suspicious traffic.
<u>Suspicious e-mails and attachments</u>	Employees regularly use e-mail for non-work related functions and open attachments and programs sent by friends and strangers.	1 2 3 4 5	Regular training of employees with e-mail to instruct employees to not open e-mails or attachments that are unfamiliar. In addition, employees trained to do personal e-mail at home, not at the office.
<u>Web Browsing</u>	Indiscriminate browsing of untrusted sites which could launch malicious programs.	1 2 3 4 5	Web browsing limited to known and trusted sites. Software like McAfee Site Advisor used to verify site authenticity.

FOR SYSTEMS WITH VIRTUAL PRIVATE NETWORKS (VPNs) and/or WIRELESS ACCESS

	WORST PRACTICES	Ranking	BEST PRACTICES
<u>Strong Encryption VPNs</u>	Weak encryption or reliance on Window's built in options. Poor control over access points (i.e. users from home and those computers)	1 2 3 4 5	VPNs with strong encryption used for remote access rather than relying on Window's built-in remote access. Control physical access.
<u>Strong Encryption Wireless Access</u>	Unsecured, unencrypted access points, allow public use (i.e. waiting room), share with another office.	1 2 3 4 5	Wireless Access Points very secure—only allow Practice computers, no visitors, no shared offices. Strong encryption.

FOR CREDIT CARD DATA

	WORST PRACTICES	Ranking	BEST PRACTICES
<u>Credit Card Data is Kept Secure</u>	No protection of card data; Credit cards accessible on unsecured network; Old card swipe machine lacking proper safety mechanisms.	1 2 3 4 5	Equipment and software is compliant with the Payment Card Industry Data Security Standards (PCI DSS). Card data is encrypted, protected, and only accessed by those who "need-to-know". No paper records of card numbers kept.
<u>Credit Card Information is Uploaded Nightly and Reconciled Weekly</u>	Haphazard uploading of data.	1 2 3 4 5	Regular uploads of data to ensure that funds are transferred and local systems can be purged.

Quality Assurance and Improvement Program Notes: How can we improve this process? _____

MEDICAL OFFICE GUIDE TO COMPLIANCE WITH OSHA

The mission of the Occupational Safety and Health Administration (OSHA) is to save lives, prevent injuries, and protect the health of America's workers. As part of the Department of Labor, OSHA and the states that operate OSHA approved state plans establish guidelines and standards to promote worker safety and health that apply to every workplace in the United States, including medical and dental offices.

This document provides only a glimpse of the most frequently found hazards in medical and dental offices. Many other standards may apply. This information should not be used as a substitute for reading and becoming familiar with all applicable OSHA standards. As an employer, it is up to you to follow up and obtain the full text of the OSHA standards, all of which are available on the OSHA website at www.osha.gov or by calling our toll free number (800) 321-OSHA (6742). Most OSHA materials are available at no charge.

The following requirements include those that normally apply to medical and dental offices, whether there are 2 or 200 employees. Additional OSHA standards may apply to some offices. The complete text of the regulations can be found in Title 29 of the Code of Federal Regulations (29 CFR).

Bloodborne Pathogens Standard

(29 CFR 1910.1030)

This is the most frequently requested and referenced OSHA standard affecting medical and dental offices. Some basic requirements of the OSHA Bloodborne Pathogens standard include:

- A written exposure control plan, to be updated annually
- Use of universal precautions
- Consideration, implementation, and use of safer, engineered needles and sharps
- Use of engineering and work practice controls and appropriate personal protective equipment (gloves, face and eye protection, gowns)
- Hepatitis B vaccine provided to exposed employees at no cost
- Medical follow-up in the event of an "exposure incident"
- Use of labels or color-coding for items such as sharps disposal boxes and containers for regulated waste, contaminated laundry, and certain specimens.
- Employee training.
- Proper containment of all regulated waste

Practice Response: We have implemented a complete Bloodborne Pathogens Policy located at PDPM 09.03.

Hazard Communication

(29 CFR 1910.1200)

The hazard communication standard is sometimes called the "employee right-to-know" standard. It requires employee access to hazard information. The basic requirements include:

- A written hazard communication program
- A list of hazardous chemicals (such as alcohol, disinfectants, anesthetic agents, sterilants, mercury) used or stored in the office

- A copy of the Material Safety Data Sheet (MSDS) for each chemical (obtained from the manufacturer) used or stored in the office
- Employee training

Practice Response: We have implemented a complete Hazard Communication Policy located at PDPM 09.61.

Ionizing Radiation

(29 CFR 1910.1096)

This standard applies to facilities that have an x-ray machine and requires the following:

- A survey of the types of radiation used in the facility, including x-rays
- Restricted areas to limit employee exposures
- Employees working in restricted areas must wear personal radiation monitors such as film badges or pocket dosimeters
- Rooms and equipment may need to be labeled and equipped with caution signs

Practice Response: As part of our purchase of x-ray equipment, we have developed an Ionizing Radiation Policy and it can be obtained from the Office Manager.

Exit Routes

(29 CFR Subpart E 1910.35, 1910.36, 1910.37, and 1910.38 and 1910.39)

These standards include the requirements for providing safe and accessible building exits in case of fire or other emergency. It is important to become familiar with the full text of these standards because they provide details about signage and other issues. OSHA consultation services can help or your insurance company or local fire/police service may be able to assist you. The basic responsibilities include:

- Exit routes sufficient for the number of employees in any occupied space
- A diagram of evacuation routes posted in a visible location.

Practice Response: Senior Management has reviewed these standards in consultation with local experts (i.e. architect, insurance agent, fire chief) and determined that we are in compliance with this regulation for an office our size.

Electrical

(Subpart S-Electrical 29 CFR 1010.301 to 29 CFR1910.399)

These standards address electrical safety requirements to safeguard employees. OSHA electrical standards apply to electrical equipment and wiring in hazardous locations. If you use flammable gases, you may need special wiring and equipment installation. In addition to reading the full text of the OSHA standard, you should check with your insurance company or local fire department, or request an OSHA consultation for help.

Practice Response: Senior Management has reviewed these standards in consultation with local experts (i.e. architect, insurance agent, fire chief) and determined that we are in compliance with this regulation for an office our size.

OSHA Poster

Every workplace must display the OSHA poster (OSHA Publication 3165), or the state plan equivalent. The poster explains worker rights to a safe workplace and how to file a complaint. The poster must be placed where employees will see it. You can download a copy or order one free copy from OSHA's web site at www.osha.gov or by calling (800) 321-OSHA.

Practice Response: We have an OSHA compliant poster on display. It is also included in our Safety Policy at PDPM 09.01.

Recordkeeping

Podiatric physicians are partially exempt from OSHA's recordkeeping regulations, due to their Standard Industrial Classification (SIC) code of 8043. This is part of the 804 series, which is exempt. This means that a podiatrist is not required to keep OSHA injury and illness records or a sharps injury log unless they are asked in writing to do so by OSHA, the Bureau of Labor Statistics (BLS), or a representative state agency. Podiatrists are required to report any workplace injury that results in fatality, or the hospitalization of three or more employees.

Practice Response: Even though podiatrists are not required to record sharps injuries, we follow the advice of many experts who recommend that we do. This log is located at the end of the BBP standard PDPM 09.03. For a PDF or XLS copy of the OSHA 300 log, visit <http://www.osha.gov/recordkeeping/RKforms.html>.

ADDITIONAL OSHA INFORMATION

OSHA assistance

OSHA can provide extensive help through a variety of programs, including technical assistance about effective safety and health programs, state plans, workplace consultations, voluntary protection programs, strategic partnerships, and training and education, and more. An overall commitment to workplace safety and health can add value to your business, to your workplace, and to your life.

Safety and health management system guidelines

Effective management of worker safety and health protection is a decisive factor in reducing the extent and severity of work-related injuries and illnesses and their related costs. In fact, an effective safety and health program forms the basis of good worker protection and can save time and money (about \$4 for every dollar spent) and increase productivity and reduce worker injuries, illnesses, and related worker compensation costs.

To assist employers and employees in developing effective safety and health programs, OSHA published recommended Safety and Health Program Management Guidelines (Federal Register 54 (16): 3904-3916, January 26, 1989). These voluntary guidelines can be applied to all places of employment covered by OSHA.

The guidelines identify four general elements critical to the development of a successful safety and health management system:

- Management leadership and employee involvement.
- Workplace analysis.
- Hazard prevention and control.
- Safety and health training.

The guidelines recommend specific actions, under each of these general elements, to achieve an effective safety and health program. The Federal Register notice is available online at www.osha.gov.

State programs

There are 26 state plans and jurisdictions that operate their own occupational safety and health programs under plans approved by OSHA (23 cover both the private sector and state and local government employees, and three cover public employees only). These "state plan states" have standards which are identical to or at least as effective as federal OSHA standards, including the bloodborne pathogens and hazard communications standards. State plan states are required to extend their coverage to state and local government workers, including health care workers.

Additional information about state plans and a list of those programs including contact information are available on OSHA's website. For information as of April, 2008, see the pages below.

IF YOU PRACTICE IN A STATE WITH A STATE OSHA PLAN, YOU SHOULD CONTACT YOUR STATE OSHA OFFICE AND/OR YOUR ATTORNEY TO UNDERSTAND WHAT ADDITIONAL RULES, IF ANY, YOU ARE REQUIRED TO COMPLY WITH.

OSHA consultation services

Consultation assistance is available on request to employers who want help in establishing and maintaining a safe and healthful workplace. Largely funded by OSHA, the service is provided at no cost to the employer. Primarily developed for smaller employers with more hazardous operations, the consultation service is delivered by state governments employing professional safety and health consultants. Comprehensive assistance includes an appraisal of all-mechanical systems, work practices, and occupational safety and health hazards of the workplace and all aspects of the employer's present job safety and health program. In addition, the service offers assistance to employers in developing and implementing an effective safety and health program. No penalties are proposed or citations issued for hazards identified by the consultant. OSHA provides consultation assistance to the employer with the assurance that his or her name and firm and any information about the workplace will not be routinely reported to OSHA enforcement staff.

Under the consultation program, certain exemplary employers may request participation in OSHA's Safety and Health Achievement Recognition Program (SHARP). Eligibility for participation in SHARP includes receiving a comprehensive consultation visit, demonstrating exemplary achievements in workplace safety and health by abating all identified hazards, and developing an excellent safety and health program.

Employers accepted into SHARP may receive an exemption from programmed inspections (not complaint or accident investigation inspections) for a period of one year. For more information concerning consultation assistance, see the list of consultation projects listed at the end of this publication.

The OSHA Voluntary Protection Program (VPP)

Voluntary Protection Programs and onsite consultation services, when coupled with an effective enforcement program, expand worker protection to help meet the goals of the OSH Act. The three VPP program levels include Star, Merit, and Demonstration and are designed to recognize outstanding achievements by companies that have successfully incorporated comprehensive safety and health programs into their total management system. The VPP motivate others to achieve excellent safety and health results in the same outstanding way as they establish a cooperative relationship between employers, employees, and OSHA.

For additional information on VPP and how to apply, contact the OSHA regional offices listed at the end of this publication.

Strategic Partnership Programs

OSHA's Strategic Partnership Program, the newest member of OSHA's cooperative programs, helps encourage, assist, and recognize the efforts of partners to eliminate serious workplace hazards and achieve a high level of worker safety and health. Whereas OSHA's Consultation Program and VPP entail one-on-one relationships between OSHA and individual work sites, most strategic partnerships seek to have a broader impact by building cooperative relationships with groups of employers and employees. These partnerships are voluntary, cooperative relationships between OSHA, employers, employee representatives, and others (e.g., trade unions, trade and professional associations, universities, and other government agencies).

For more information on this and other cooperative programs, contact your nearest OSHA office, or visit www.osha.gov.

The OSHA Alliance Program

Alliances enable organizations committed to workplace safety and health to collaborate with OSHA to prevent injuries and illnesses in the workplace. OSHA and its allies work together to reach out to, educate, and lead the nation's employers and their employees in improving and advancing workplace safety and health.

Alliances are open to all, including trade or professional organizations, businesses, labor organizations, educational institutions, and government agencies. In some cases, organizations may be building on existing relationships with OSHA through other cooperative programs.

There are few formal program requirements for alliances, which are less structured than other cooperative agreements, and the agreements do not include an enforcement component. However, OSHA and the participating organizations must define, implement, and meet a set of short- and long-term goals that fall into three categories: training and education; outreach and communication; and promotion of the national dialogue on workplace safety and health.

OSHA training and education

OSHA area offices offer a variety of information services, such as compliance assistance, technical advice, publications, audiovisual aids and speakers for special engagements. OSHA's Training Institute in Des Plaines, IL, provides basic and advanced courses in safety and health for federal and state compliance officers, state consultants, federal agency personnel, and private sector employers, employees, and their representatives.

The OSHA Training Institute also has established OSHA Training Institute Education Centers to address the increased demand for its courses from the private sector and from other federal agencies. These centers are nonprofit colleges, universities, and other organizations that have been selected after a competition for participation in the program.

OSHA also provides funds to nonprofit organizations, through grants, to conduct workplace training and education in subjects where OSHA believes there is a lack of workplace training. Grants are awarded annually. Grant recipients are expected to contribute 20 percent of the total grant cost.

For more information on grants, training, and education, contact the OSHA Training Institute, Office of Training and Education, 1555 Times Drive, Des Plaines, IL 60018, (847) 297-4810. For further information on any OSHA program, contact your nearest OSHA area or regional office listed at the end of this publication.

Information available electronically

OSHA has a variety of materials and tools available on its website at www.osha.gov. These include e-Tools such as Expert Advisors, Electronic Compliance Assistance Tools (e-cats), Technical Links; regulations, directives, publications; videos, and other information for employers and employees. OSHA's software programs and compliance assistance tools walk you through challenging safety and health issues and common problems to find the best solutions for your workplace.

OSHA publications

OSHA has an extensive publications program. For a listing of free or sales items, visit OSHA's website at www.osha.gov or contact the OSHA Publications Office, U.S. Department of Labor, 200 Constitution Avenue NW, N-3101, Washington, DC 20210. Telephone (202) 693-1888 or fax to (202) 693-2498.

Contacting OSHA

To report an emergency, file a complaint, or seek OSHA advice, assistance, or products, call (800) 321-OSHA or contact your nearest OSHA regional or area office listed at the end of this publication. The teletypewriter (TTY) number is (877) 889-5627.

You can also file a complaint online and obtain more information on OSHA federal and state programs by visiting OSHA's website at www.osha.gov.

For more information on grants, training, and education, contact the OSHA Training Institute, Office of Training and Education, 1555 Times Drive, Des Plaines, IL 60018, (847) 297-4810, or see Outreach on OSHA's website at www.osha.gov.

OSHA Regional Offices

Region I

(CT,* ME, MA, NH, RI, VT*)

Boston, MA 02203

(617) 565-9860

Region II

(NJ,* NY,* PR,* VI*)

201 Varick Street, Room 670

New York, NY 10014

(212) 337-2378

Region III

(DE, DC, MD,* PA,* VA,* WV)

The Curtis Center

170 S. Independence Mall West Suite 740

West Philadelphia, PA 19106-3309

(215) 861-4900

Region IV

(AL, FL, GA, KY,* MS, NC,* SC,* TN*)

Atlanta Federal Center

61 Forsyth Street SW, Room 6T50

Atlanta, GA 30303

(404) 562-2300

Region V

(IL, IN,* MI,* MN,* OH, WI)
230 South Dearborn Street, Room 3244
Chicago, IL 60604
(312) 353-2220

Region VI

(AR, LA, NM,* OK, TX)
525 Griffin Street, Room 602
Dallas, TX 75202
(214) 767-4731 or 4736 x224

Region VII

(IA,* KS, MO, NE)
City Center Square
1100 Main Street, Suite 800
Kansas City, MO 64105
(816) 426-5861

Region VIII

(CO, MT, ND, SD, UT,* WY*)
1999 Broadway, Suite 1690
PO Box 46550
Denver, CO 80202-5716
(303) 844-1600

Region IX

(American Samoa, AZ,* CA,* HI, NV,* Northern Mariana Islands)
71 Stevenson Street, Room 420
San Francisco, CA 94105
(415) 975-4310

Region X

(AK,* ID, OR,* WA*)
1111 Third Avenue, Suite 715
Seattle, WA 98101-3212
(206) 553-5930

*These states and territories operate their own OSHA-approved job safety and health programs (Connecticut, New Jersey, and New York plans cover public employees only). States with approved programs must have a standard that is identical to, or at least as effective as, the federal standard.

Note: To get contact information for OSHA Area Offices, OSHA-approved state plans, and OSHA Consultation Projects, please visit us online at www.osha.gov or call us at (800) 321-OSHA.

OSHA INSPECTION POLICY

WARNING: THIS DOCUMENT DOES NOT AMOUNT TO LEGAL ADVICE. THIS DOCUMENT SHOWS SOME OF THE CONSIDERATIONS INVOLVED IN AN OSHA AUDIT. YOU SHOULD ALWAYS CONTACT YOUR ATTORNEY IF YOU FIND YOURSELF IN AN OSHA AUDIT SITUATION.

If OSHA arrives onsite:

- First, **request ID/Credentials**. If they cannot show you these, then politely ask them to leave and request that when they return they supply you with their credentials because you cannot consent to an inspection without these.
- Once you have verified their credentials, **request a copy of the warrant**. If they do not have a warrant, then only a member of Senior Management may waive the need for the warrant. A member of Senior Management should consider giving the inspector a copy of our search warrant policy. (See next page).
- **REMEMBER – you can ask for a moment to compose your thoughts and review your instructions**. Also remember that as a practical matter, if you do not allow the inspector to do what he/she wants, do not expect any consideration from them. This does not mean you have to, it is just a consideration.
- Call your OSHA attorney and ask for guidance at this point.

What your attorney is likely to tell Senior Management:

- If OSHA is there for a particular reason such as an employee complaint, before consenting to an inspection try to get OSHA to agree to limit the scope of the inspection. You only want to show them the reason for the complaint, not everything in the Office.
- Tactfully ask the inspector the basis for the inspection and then decide whether you will allow it. Note to Office Manager and/or OSHA Compliance Manager: if no one from Senior Management is available, then politely and tactfully tell the OSHA inspector that a warrant will be necessary because you do not have the authority to consent to an inspection.
- **Request an unsigned copy of the complaint** if the inspection resulted from a complaint—you are entitled to a copy.
- If you decide to require a warrant, make sure the OSHA inspector produces the warrant for you to see. If it is accompanied by an administrative subpoena, this permits them to do employee interviews.
- If the inspection happens, take very good notes about what happens.

OSHA Search Warrant Policy

- It is the policy of this Practice to require a search warrant for all inspections and/or investigations. The reason for this policy is so the Practice may preserve its right to require a search warrant at any point during an inspection should the Practice and your agency agree to a limited scope inspection without the need for a warrant. It is also the policy of this Practice to cooperate with government agencies. If your agency and our Practice can agree to a limited scope inspection, especially if your inspection is based upon an employee complaint, we will allow your entrance into our facility for the purpose of that limited scope inspection with the very clear understanding that if we deem your inspection exceeding the scope of the agreed to inspection that your inspection will be terminated and a warrant will be required on your part for any further inspection by you.
- We specifically inform you that we do not waive our right to require you to have a warrant at any stage of your inspection. Any agreement by our Practice to allow your entrance is specifically contingent upon this understanding.