



# 2022 Risk Management Plan

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January 2022

Created by Jane Gordon

Safety and Risk Management Officer

*To support individuals with disabilities in directing their own lives as valued members of the community.*



2022 Risk Management Plan

Type	Risk	Likelihood (H, M, L)	Impact (H, M, L)	Mitigation Strategy	Contingency Plan
1. Workforce Issue	Not enough employees to provide authorized services  Some employees are overworked, burnt out, make mistakes because they are tired  Increase in EEOC claims	High	High	<b>Improve recruitment, retention, training, communication</b>  <b>Provide training to supervisory staff to avoid discrimination</b>	Enforce maximum consecutive hours/days worked  Determine threshold for accepting new service referrals when short-staffed
2. Services	Individuals with challenging behaviors increase risk of negative publicity – with the public and in recruiting employees/landlords	High	High	<b>Improve training for staff who work with individuals with challenging behaviors to prevent negative impact on community</b>	Train staff what to say to public when they are in the moment Determine threshold for when to discontinue services
3. Workers Comp and Property Damage	The frequency and severity of employee injuries and property damage is too high	High	High	<b>Increase training and protective equipment for staff working with individuals with challenging behaviors</b>	Have gurus, behavior consultants and program sups talk to employees involved in injuries and property damage to discuss better ways to de-escalate situations
4. Audits	Not following regulations puts funding at risk	High	High	<b>Develop system to cost effectively conduct audits, follow up on audits of services, billing, employee requirements, rights, etc.</b>	Conduct a small sample of records to audit to identify areas of concern
5. Funding	Impact quality of services and ability to provide all services	High	High	<b>Work with legislators to educate them on the need for continued funding</b>	Increase efficiency by monitoring current spending practices, monitoring accounts receivable, and maintaining financial reserves



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6. Insurance	Costs, including premiums, continue to rise, plus we have a somewhat unhealthy workforce	High	Medium	Rebid policies as needed Wellness Program	Plan for budget increase Decrease benefit, increase percentage employee pays
7. Facility Security	Risk of property damage/injury due to poor facility security	Low	High	Remodel entryways of office buildings	Train staff on safety practices and procedures
8. Cyber Security	Risk of breach due to poor cyber security	Medium	Medium	Improve security measures	Maintain current practices
9. Organizational Resiliency	Risk of staff unfamiliar with disaster procedures	Low	Medium	Continue training all staff in office buildings, group homes and ISLs for variety of emergencies	Maintain current practices, drills, etc.
10. Business Continuity	How to conduct business if Pythian Office was not available (tornado), Norton lost power, etc.	Low	Medium	Investigate alternatives while maintaining current plan	Employees work from home, Schedule specific maintenance men to cover each area



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Action Plan Item #1	Workforce Issues		
Risk	Not enough employees to provide authorized services Increase in EEOC claims		
Summary (recommended response & impact)	Employees are often overworked, burn out, make mistakes because they are tired, etc. Not all authorized services are provided		
Proposed Actions		Person Responsible	Target Date
a. Investigate options to improve recruitment methods, interview practices, compensation packages and program specific interview questions to get the right people hired. b. Provide ongoing training to new management staff and supervisors on Title 7, HR best practices, etc. to reduce likelihood of EEOC claims against the Arc		Marybeth	Ongoing
c. Improve retention by 2%		Directors	Ongoing
d. Improve communication using all staff email, mandatory staff meetings with set agenda, Glip, etc. e. Continue to use home page of ADP for company announcements, policies, benefits, etc. f. Enforce maximum consecutive hours/days worked g. Determine threshold for accepting new service referrals when short staffed		Directors	Ongoing
h. Respond to COVID-19 Pandemic		Mike Powers	Ongoing



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Action Plan Item #2	Services		
Risk	Individuals with challenging behaviors increase risk of negative publicity – with general public and landlords, and recruiting employees		
Summary (recommended response & impact)	Improve training for staff who work with individuals with challenging behaviors to prevent the situations that have a negative impact on community Review admission criteria for what support needs we are able to meet in our various locations		
Proposed Actions		Responsible Person	Target Date
a. Utilize the Critical Incident Review Committee to review all critical incidents, complete debriefings with staff, and provide additional training <i>Committee meets monthly to discuss individuals with concerns</i>		Dr. Glass, Tiara, Alisa, Clay, ABA, Behavior Consultants	Ongoing
b. Meet with local police/sheriff departments to educate them on our services and clientele c. Meet with local landlords and realtors to educate them on our services/clientele to broaden our choice of rental property		Dr. Glass, Alisa, Clay	Ongoing
d. Intake will use a rigorous review of all intakes; all referrals will be sent to Vice Presidents for final approval e. Continue to work with DMH throughout the process of termination of services for individuals we are not able to support		Dr. Glass, Alisa, Clay	Ongoing



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Action Plan Item #3		Workers Comp/Property Damage	
Risk	The frequency and severity of employee injuries and property damage is too high		
Summary (recommended response & impact)	Increase training and use of equipment for staff working with individuals with challenging behaviors and individuals who have mobility issues		
Proposed Actions		Responsible Person	Target Date
<ul style="list-style-type: none"> <li>a. Identify causes of injuries to address better prevention</li> <li>b. Meet with Missouri Employers Mutual loss control consultant to discuss new strategies <i>Rhonda Kauffman with MEM regularly attends HSC meetings, discusses trends with Jane and offers suggestions</i></li> <li>c. Health and Safety Committee will revise the Safety Incentive Program for the 2022-2023 policy year</li> <li>d. Maintain mod under 1.00 (Mod for 22-23 is 0.9)</li> </ul>		Jane	Ongoing
<ul style="list-style-type: none"> <li>e. Investigate more options for protective equipment to reduce amount of physical intervention for individuals with aggressive behaviors</li> <li>f. Create policy/procedure for cleaning and maintaining equipment</li> <li>g. Investigate more options for equipment and technology to reduce amount of physical intervention and assistance for individuals who need assistance with mobility, transfers, etc.</li> <li>h. Utilize Behavioral Consultants as needed</li> </ul>		Jane, Tim, Alisa, Clay	Ongoing
<ul style="list-style-type: none"> <li>i. Directors will complete a Plan of Action when they do not meet their safety goal <i>Completed quarterly</i></li> </ul>		Jane	Ongoing
<ul style="list-style-type: none"> <li>j. Continue to monitor the effectiveness of Mandt and PCM trainings</li> </ul>		Frank	Ongoing



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Action Plan Item #4	Audits		
Risk	DMH and CMS regulations not followed consistently due to frequent changes and interpretations		
Summary (recommended response & impact)	Not following regulations puts funding at risk		
Proposed Actions		Responsible Person	Target Date
a. Follow up on internal audits and address trends		Tiara	Ongoing
b. Educate our staff and stakeholders on contractual requirements as changes occur		John	Ongoing
c. Investigate electronic financial modules available <i>There are options available in Therap, but we have chosen to not initiate a new program at this time.</i>		Tiara, John	December,2022
d. Continue to conduct routine audits to ensure proper documentation, address trends by departments, and retrain, if needed <i>Program Support Coordinators complete audits daily. QM Team conducts additional audits periodically to verify.</i>		Tiara	Ongoing



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Action Plan Item #5	Funding		
Risk	Impact quality of services and ability to provide all services		
Summary (recommended response & impact)	Need to maintain revenue to provide a wide range of quality services		
Proposed Actions		Responsible Person	Target Date
a.	Continue to meet with and educate legislators/MARF to reduce budget cuts	Mike, Tim, John, Karen	Ongoing
b.	Continue to monitor programs that are not sustainable or struggling, budget cuts	Tim, John	Ongoing
c.	Continue to review employee positions for most efficient use, is position needed, etc.		
d.	Continue to evaluate rate allocations, cost centers, etc. to determine whether to continue or discontinue contracts		
e.	Reduce overtime to under 8%	Tim	July, 2022
f.	Maintain a four-month financial reserve for the stability of the organization	Mike	Ongoing
g.	Continue to raise funds to make up loss from funding cuts and cover unfunded services and programs	Jessica	Ongoing
h.	Monitor the effectiveness of the payee position and procedures	John	Ongoing





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Action Plan Item #6		Insurance	
Risk	Cost of premiums continue to increase		
Summary (recommended response & impact)	Health insurance costs are rising We have a somewhat unhealthy workforce Cost of insurance premiums are increasing, insurers placed limits on umbrella coverage		
Proposed Actions		Responsible Person	Target Date
a. Rebid policies as needed b. Plan for budget increase c. Consider need to decrease benefits, increase percentage employee pays d. Consider rebidding umbrella coverage to increase amount of coverage <i>Investigation results were cost prohibitive; at this time no additional coverage has been purchased.</i>		John	Ongoing
e. Use health risk assessment data to improve the Wellness Program to include physical fitness, emotional and mental health, financial health, nutrition, etc. <i>The Wellness Committee continues to send reminders, helpful hints, etc. frequently to all employees.</i>		Marybeth	Ongoing
f. Our insurance carrier has changed their policies on use of firearms, inflatables, trampolines, etc. Review, and revise if needed, our policies that address our use of these items.		Jane	July, 2022



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Action Plan Item #7	Facility Security		
Risk	Risk of injury and property damage due to poor facility security		
Summary (recommended response & impact)	Investigate options for remodeling Arc facilities, especially entryways		
Proposed Actions		Responsible Person	Target Date
a. Have OEM, fire, police tour offices to review emergency procedures, be familiar with our buildings b. Train new office staff on emergency and security procedures		Jane	Ongoing
c. Redesign Pythian entrance for improved security and accessibility d. Investigate how to better use panic buttons, i.e., to both contact police and automatically lock doors from the outside, evaluate location of panic buttons, train staff on use of panic buttons, etc. <i>This will be included in the Activity Center remodel</i>		Ron	December, 2022
e. Plan to replace keys (and ID badges) with key fob/badge for Pythian, Monett and KC offices; we do not replace locks when employees terminate employment <i>This will be included in the Activity Center remodel</i>		Mike R.	December, 2022
f. Investigate the possibility of using the key lock boxes on ISL doors, or some other means of ensuring that past staff can no longer access the home.		Ron, Mike R.	December, 2022



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Action Plan Item #8	Cyber Security		
Risk	Risk of breach due to poor cyber security		
Summary (recommended response & impact)	Hackers constantly learn how to break into new security measures		
Proposed Actions		Responsible Person	Target Date
a. Continue to review options to better protect our firewall's vulnerabilities <i>Work continues on our Office 365 portal Two Factor Authentication. People accessing our domain from outside our network (including employees working remotely) will need to connect to the VPN and 2FA.</i>		Mike R	Ongoing
b. Continue to provide periodic training and reminders from IT Dept to all staff reminding them of their responsibility and educating them how to protect our information <i>Employees sign IT policies during onboarding and when checking out laptops, IT Dept continues to send periodic emails with alerts and reminders to all users</i>		Mike R, Marybeth, Frank	Ongoing
c. IT Department will conduct periodic social engineering training and tests with employees by sending fake emails, phone calls, etc. to our employees to check their knowledge/response <i>IT Dept has schedule of unannounced training and remedial training for the year.</i>		Mike R	Ongoing
d. Schedule outside agency to conduct annual security audit for us. Schedule Dazzee Integrations to review our policies to assure all recent changes and additions are up to date.			



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Action Plan Item #9		Organizational Resiliency	
Risk	Risk of temporary unstable business continuity due to incomplete planning (natural disaster) Investigate alternate power sources, especially offices and Norton		
Summary (recommended response & impact)	Develop more comprehensive plans for all office buildings, group homes and ISLs for variety of emergencies The Arc has several generators stored at Elfindale; we need a specific plan to distribute and supervise them quickly when needed		
Proposed Actions		Responsible Person	Target Date
a. Include more detail in disaster plans, improve communication of plans, continue training on plans. <i>Jane reviews disaster plans with staff during safety visits</i>		Jane	Ongoing
b. Alternate power source for outlying offices and Norton (we have 9 generators) c. Investigate Barber home getting their own generator with funding from DD Board d. Investigate Beth Court getting their own generator e. Develop plan for specific maintenance men to cover each area <i>Chris – Joplin/Monett; Ron – KC; Bill – Bolivar; Tyler and Lonnie – Springfield, Marshfield, Mtn. Grove, Crowhaven</i>		Ron	December 2022



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Action Plan Item #10	Business Continuity		
Risk	How to conduct business in the event the Pythian Office was unavailable (due to natural disaster)		
Summary (recommended response & impact)	Develop thorough plans for all office buildings, group homes and ISLs for variety of emergencies		
Proposed Actions		Responsible Person	Target Date
a. Maintain IT Disaster Preparedness Plan as agency grows <i>Because of previous planning and preparing, IT was able to quickly provide employees with needed technological equipment when most office-based personnel transitioned to temporarily work remotely due to COVID.</i>		Mike R	Ongoing
b. Maintain the Business Continuity Plan in all Disaster Plans <i>Each department has a schedule for employees to work in the office or remotely. Except for small groups, meetings are conducted virtually. Virtual meetings and remote work continue to be used as needed.</i>		Jane	Ongoing

Date Reviewed by Executive Staff	
Date Reviewed by Board of Directors	
Date Reviewed by Senior Staff	