To: All Residents  
From: Judie Wohnsiedler  
Date: 9/4/2014  
Re: Private Duty Caregiver Policy

Comments: Provided in your mailbox is the Private Duty Caregiver Policy which a group of residents and I crafted to bring some order to the private employment of caregivers attending residents of Collington. We are opening this up for a comment period that will end on September 26, 2014. If you have comments that you would like to make please put them in writing and take to the Administration Office (Karen Cheney/Marvell's office) where you may place them in my mailbox. Your suggestions will be reviewed.

After that time we will be making arrangements to have a meeting with those individuals who are employing private duty caregivers. We expect to be implementing this policy in October, 2014
POLICY: It is the policy of Collington to provide direction and oversight for privately hired companions/aides engaged by residents of this community, their family members, responsible parties or other interested individuals.

Residents or families who wish to employ companions or aides must follow all appropriate rules and regulations.

PURPOSE: The purpose of this policy is to clarify the role and the applicable regulations relevant to companions/aides or other privately hired help at Collington

PROCEDURES:

1. Families/residents wishing to employ a private companion/aide will notify the Director of Social Services.

2. The family/resident will work with the care team to establish hours and appropriate tasks for the companion/aide. Tasks that an aide may complete will depend on whether or not the aide is certified as a Home Health Aide or a Certified Nursing Assistant.

3. Individuals who are to be considered for employment by a resident at Collington must have the following documentation available for review upon hire and annually thereafter:
   a. Copy of license or certification (if providing medical or hands on care)
   b. Criminal Background check, including the Sex Offender Registry
   c. Non-reactive Mantoux test or negative chest x-ray
   d. Certificate of insurance for Personal Liability
   e. Written physician's statement that the individual is free of communicable disease
   f. Valid driver's license if the caregiver will be driving the resident
   g. Certificate of insurance for automobile liability

4. A member of the Social Services staff will review the "Private Duty Personnel Guidelines" with the companion and resident/family member in advance of any services provided.

5. Services provided by a companion/aide may augment those which the adult care facility is required by law or regulation to provide.

6. Collington will not be responsible for healthcare or nursing assistance provided by private duty personnel or domestic help in private residences. Collington is not able to provide assistance in the event a private caregiver is unable to fulfill their obligation.
7. Employees of Collington are not permitted to be employed by residents/families as paid companions or aides.

8. Expectations:
   - **Confidentiality** Information concerning residents is considered confidential and should not be discussed with anyone other than appropriate Collington staff or medical personnel.
   - **Keys** Privately employed individuals may not have keys or remote access devices belonging to residents and providing access to the building and grounds.
   - **Parking** Privately employed individuals are expected to park in the parking areas designated for employees, not in visitor parking.
   - **Dress code** Dress should be appropriate to the tasks being completed.
   - **Name tags** All privately employed individuals are expected to have a name tag with the name clearly visible.
   - **Smoking** The designated smoking area at Collington is on the Loading Dock, smoking in other areas is prohibited.
   - **Dining Services** A Waiting Area is available for those caregivers not eating with or assisting the resident with a meal. Caregivers will be given the take-out meal by Dining Services staff members. Food and beverages are provided only for residents.

9. The Collington campus is private property and as such we reserve the right to ask that any visitor, aide, etc. leave the community for failure to comply with this policy or for inappropriate behavior.

10. Private Duty Personnel and their employer will review and acknowledge the Private Duty Personnel Guidelines that fully outline responsibilities, expectations and behavior.
PERSONAL APPEARANCE/UNIFORMS

As part of a professional organization it is important for everyone to present a professional image to our residents, guests and the public. Appropriate attire is important for your position. A neat, clean and well groomed appearance is expected at all times. Sideburns, beards and mustaches should be neatly trimmed. Safety in dress and in the wearing of personal jewelry should be considered by all personnel. Facial jewelry is not to be worn by any employee while on duty unless it is for legitimate purposes such as religious reasons.

a. Uniforms — based on your specific position, your department manager may issue uniforms to you. You will be asked to sign a property issue form which grants Collington the right to deduct from your final paycheck cost for items damaged or not returned. Collington issued uniforms are not be worn off duty, except as necessary in traveling to and from work. You are responsible for the department guidelines regarding cleaning and maintenance of issued items.

Some employees may be required to provide their own uniforms, in which case, Collington provides those employees with an annual stipend which is to be used to replace worn out uniform items. In either case, at all times, employees are expected to report to work in the proper uniform. Individuals reporting to work not in uniform will be sent home.

Upon separation from Collington, all company-issued uniforms and other company-issued items issued are to be returned. Failure to return issued uniforms and items will result in the cost of those items being deducted from your final paycheck at the fair replacement value cost.

b. Business Dress - Employees working in an office environment are expected to follow traditional business or business casual dress guidelines. When in doubt regarding the appropriateness of something in your wardrobe, refer to the following guidelines:

Traditional Business: suits or sports coat and dress slacks with a tie for men. Dresses or suits for women; dress slacks or skirts with blazer or sweater for women.

Business Casual: dress or casual slacks; skirts or dresses no more than five inches above the knee; knee length shorts; blouses (women blouses are not to hang more than three (3) inches below the top of the sternum nor be shorter than top of the hip level), polo shirts, vests, cardigans for women. Polo shirts, sport coats, vests, sweaters and shirt and tie for men.

The following are inappropriate or unacceptable dress in the work environment (unless specifically designated as a casual day by your department or companywide): jeans; tee shirts with logos. The following are inappropriate or unacceptable dress in the work environment at all times: skirts and shorts more than five inches above the knee; tee shirt (undershirt); halter top, tank top, tube top and midriff top; bib overalls; flip flops; beach/pool shoes; any clothing item with slogans or symbols which may be considered provocative or obscene. Leggings; bare feet; pants, shorts, or skirts worn below the waistline; low-cut tops, sexually provocative clothing; clothing of any kind with profanity, nude or semi-nude pictures or suggestive slogans, cartoons, or drawings; the observable lack of undergarments and exposed undergarments.
PRIVATE DUTY PERSONNEL GUIDELINES

Collington, a Kendal Affiliate, recognizes that you are an integral part of the care our residents receive. As such, you are considered a valuable part of our community. However, in order to maintain order in our operations, we are asking for your cooperation and compliance with the following Collington guidelines:

1. **Registration with Collington, A Kendal Affiliate.** All private duty personnel must be registered with Collington's Social Services Department. Each individual must fill out the necessary form, sign agreement and obtain a copy of the Private Duty Personnel Guidelines.

2. **Sign Log Sheet upon arrival and departure.** Private duty caregivers must sign in each time they arrive at the community to work for a resident and sign out upon departure. Sign-in sheets will be maintained at the Security Desk, please stop there on your way to your assignment.

3. **Confidentiality.** All resident information is confidential and should never be discussed with anyone other than appropriate Collington staff.

4. **Keys/Remote Access.** Private duty caregivers are not permitted to have keys or remote access devices giving them access to the building/grounds or resident's private living unit.

5. **Parking.** Parking is available in spaces identified for employees, located near the entrance to the Creighton Center. Cars parked inappropriately in spaces identified for residents, visitors, marketing, or company vehicles may be towed at the owners' expense.

6. **Dress code.** Private duty personnel entering the commons areas of the Collington must be dressed appropriately. Details regarding the dress code are attached. Sleepwear, slippers, and revealing clothing are prohibited.

7. **Name Tag** a name tag with your name clearly visible must be worn at all times.

8. **Use of telephones.** Use of cell phones is prohibited in the commons areas. Personal phone calls are not permitted on Collington phones. Independent living residents may grant permission to private duty caregivers to utilize cell phones in their apartments.

9. **Solicitation.** Unauthorized solicitation of any kind, including all goods and services, is not permitted. There shall be no distribution of any kind, including circulars or other printed materials.

10. **Smoking.** Smoking in the building, or in any other areas on the property is not permitted. Private duty caregivers may either smoke in their parked vehicles or off Collington's property.

11. **Meals.** Meals should be eaten in the residents' living unit or outside the building. Private duty caregivers who are invited to eat in the Dining Room with their resident employer must be dressed appropriately. Private duty employees are responsible for caring for their
resident employer, rather than asking a member of the Collington dining room staff to care for the resident. Meals eaten by private duty personnel in the Dining Room will be charged as a guest meal on the resident's monthly invoice.

**Designated Waiting Area.**
- Private duty caregivers may wait with their resident at the resident's table in the dining room with the resident approval or if the resident is in need of assistance with feeding.
- Private duty caregivers may wait for their residents in the designated area located at the far end of the dining area.
- Private duty caregivers may not wait in the Ivy Bar.
- Cell phone usage is prohibited in designated waiting areas as well as other dining areas.

**Food and Beverage Takeout.**
- Private duty caregivers may not utilize the coffee machine, fresh bakery, or fresh fruits located in the Ivy Bar area for personal consumption. Private duty caregivers may assist their resident with coffee, fruits and fresh bakery items. Private duty caregivers may use the coffee machine located in the Employee Lounge located in the Service Corridor behind the main kitchen.
- Private duty caregivers may not take any food or beverage from the Dining Room without the resident's written permission or phone call request.
- Private duty caregivers may not help themselves in preparing a resident takeout meal. A Dining Room attendant will prepare all takeout meals.

12. **Resident Functions.** Resident functions, including entertainment, social events, and meetings are scheduled for residents only. Private duty personnel may accompany residents to the events.

13. **Resident Transportation.** Limited seating on Collington vehicles restricts recreational trips out of the building to residents only. Private duty personnel may accompany residents during transportation to medical appointments, there may be an additional charge for this.

14. **Fitness Room, Swimming Pool, Laundry.** These areas are reserved for the use of residents. Private duty personnel are not permitted to use these spaces for personal needs.

15. **Resident Common Areas.** Private duty personnel are limited to residents’ apartments and may be in community space only when accompanied by a resident or when performing a task to benefit a resident.

16. **Abuse and neglect.** It is Collington's policy that all residents of our community live in an environment that is free from abuse of any kind, by anyone, at all times. Proper measures are taken to prevent and maintain an abuse free environment in accordance with Maryland State and Federal Law. If abuse or neglect has occurred or is suspected, Collington will immediately begin an investigation into the incident and will report the investigation to
State authorities. If an incident involves an agency employee, the agency will also be contacted regarding the investigation.

17. **Resident Care and Emergency protocols.** Although private duty personnel are instrumental in providing quality care and resident advocacy, Collington's staff must be permitted to do their jobs. As such, any aide employed directly by the resident must not interfere in the care being provided to maintain the resident's well-being. Collington will not be responsible for healthcare or nursing assistance provided by private duty personnel or domestic help. Collington's supervisory staff or the local Fire Chief shall provide direction in the event of an emergency.

18. **English Only.** While on duty with residents English is to be spoken, on breaks and in employee areas other languages may be spoken as desired.

19. **Country Store.** Private duty personnel may purchase and pay for items for their own use from the Country Store. Other purchases made on behalf of a resident must be accompanied by a list which is signed and dated by the resident before these items may be charged to the resident's account.

Collington will not tolerate:
- Abusive and/or disrespectful language
- Theft from residents at Collington
- Endangerment of the welfare and safety of a resident, visitor, or employee
- Possession of a firearm or any other weapon
- Removal of any of Collington's property
- Acts of violence, threats, or potentially dangerous situations
- Interference with the work of employees
- Family members of private duty personnel shall not be allowed to remain on campus during working hours, nor shall they remain overnight in the resident's private unit.

Any individual found in violation of any these rules may be asked to leave the property. Collington is private property and as such reserves the right to limit or revoke visitation rights of all private caregivers. Collington also reserves the right to contact local law enforcement should we feel it is necessary to protect the safety of our residents, visitors, or employees or the operations of our Community.

Again, we consider private duty personnel a valuable part of the team and want to continue to facilitate a positive working relationship with you. Thank you for your dedication to our residents!