



## Westchester County Parks Risk Management Plan



### 100 Introduction to the Risk Management Plan

It is the mission of the PRC Risk Management Plan to adhere to the program set forth in the Westchester County Risk Management Program. In addition, PRC is to identify and assess risk, develop risk response strategies and manage PRC operations to reduce risk and.

### 101 Goals

The Westchester County Department of Parks, Recreation and Conservation works in conjunction with the County Risk Management Office to:

- ❖ Provide the safest environment for all park visitors and the safest work conditions for its employees;
- ❖ Protect the County against the adverse financial consequences of accidental losses;
- ❖ Identify and prioritize risk exposure areas and to identify alternatives to mitigate those exposures;
- ❖ Develop and implement a loss prevention program in order to reduce accidents which may cause injury to members of the public or to employees;
- ❖ Reduce the frequency and severity of all property losses;
- ❖ Process all accident and loss notices filed by and/or against the County.

### 102 Timeline

The goals of the PRC Risk Management Plan shall be reviewed on an annual basis. Team members will meet on a regular basis, drawing input and recommendations from field employees and make changes to the Risk Management Plan as they are warranted.

### 103 Organizational Structure

Westchester County Division of Risk Management

- The Westchester County Division of Risk Management comes under the auspices of the Law Department with the Director of Risk Management reporting to the County Attorney. The Risk Management Office includes:
  - Director of Risk Management Senior Risk
  - Management Analyst Risk Management Analyst
  - Staff Assistant
- County-wide Risk Management Procedures originate from the Office of Risk Management. They include and are not limited to: risk and insurance management, establishment of the Property and Casualty Reserve Fund, identification of risk exposure, maintenance of inventories on insurable values of all properties, staying informed about the liability status of municipalities, supervise all loss prevention activities, cooperate in establishment of a working safety program and report current status to the County Attorney.

#### PRC Risk Management Organization

- The Associate Director of Division (Deputy PRC) is the PRC liaison to the Office of Risk Management and is responsible for implementing the Parks Department Risk Management Plan. He is also the PRC Finance Officer and responsible for reporting all losses, accidents, injuries and potential suits against the County to the Director of Risk Management.
- PRC Risk Management Team Members:

<i><b>Position</b></i>	<i><b>Responsibilities</b></i>
Associate Director of Division (Deputy PRC)	Contracts Safety & Loss Control Equipment, Vehicles Authorizations
Director of Programs and Services	Program Safety
Program Administrator (Payroll/Personnel)	Human Resources Record Keeping of Training
Director of Operations (Maintenance-PRC)	Emergency Plans Health Department Codes
Director of Maintenance - PRC	OSHA Standards Building Codes
Program Administrator (Park Management)	Accessibility Playground Safety

#### **104 Employee Involvement**

The objectives of the Risk Management Plan can only be implemented through interaction between the employees and supervisors/managers. Day to day, the employee is able to identify the risks associated with the tasks they perform. Supervisors may observe potential risk and work with the employees to change the way a task is performed.

##### Field Staff

- PRC field staff, usually the first to discover property damage, theft, loss or vandalism will report it to their supervisor.

- Field employees are more apt to be injured on the job than are members of management and therefore able to provide key information in risk appraisal by nature of their front-line position.
- Loss prevention depends on employee involvement in everything from putting tools back in their proper place to locking cabinets and doors, to tracking material usage. Gasoline pumping locations, for example, must keep track of the number of gallons pumped with accurate logs key to the process. When an attendant is not present, the pumps are locked.
- The Risk Management Plan provides an on-site visit to every location that include, not only an inspection and list of things that would help mitigate risk, but an opportunity for interaction directly between field employees and the Office of Risk Management.
- Many parks have private housing facilities that are rented by staff members, who in addition to paying rent for the house are charged with the responsibility of keeping watch for suspicious visitors/situations within the park and reporting them immediately.

#### Facility Managers

- Facility Managers are expected to brainstorm with their employees the real or potential risks at their location based on experience. Procedures may be site specific and implementable without any further assistance, or the Supervisor may bring recommendations to his/her Director. Sharing solutions provides for everyone's well-being
- Facility Managers receive a list annually of staff injured on the job at their location. Reviewing the types of injuries with staff may lead to prevention of further loss in the future. Follow-up steps taken may include; a request for job training, revising the way a task is performed or making changes to the Personal Protective Equipment Plan.

#### Directors

- A Director responsible for multiple locations is able to identify risks that are common to all or most, and offers input on an effective safety and loss prevention program.
- The Commissioner shall report to the County's Director of Risk Management the following changes in property under their supervision:
  - Changes in building use or occupancy must be submitted in writing to the Department of Risk Management as building use bears directly on insurance rates and public liability status.
  - Razed buildings.
  - Changes in equipment, including the disposal of all insurable equipment.

- Property losses occurring from fire or other causes shall be reported immediately, in writing to the Director of Risk Management.
- The Associate Director of Division (Deputy PRC) is the liaison to the Department of Risk Management and is directly involved with the policies and procedures developed to mitigate risk. He is the person in the Parks Department responsible for risk management within the Department, any training, or safety and security measures to be taken.
- The Associate Director of Division (Deputy PRC) is the Finance Officer and reports property loss, vandalism, accidents, and employee injuries to the Risk Management Office and tracks where within PRC problems may exist. He brings these to other members of the risk management team for discussion and is responsible for follow through with the Office of Risk Management.

## **105 Ethics and Standards of Conduct**

As a public service agency, the Westchester County Department of Parks, Recreation and Conservation strives to provide the best possible services while fully utilizing available resources. As a dedicated staff, our mission is to provide services to people of all ages and abilities in order to satisfy their leisure-time needs and therefore improve the quality of their lives. In doing so, we adhere to Executive Order 3 of 2008 and will operate according to the following code:

- Adhere to the highest standards of integrity and honesty in all public and personal activities in order to inspire public confidence and trust.
- Strive for the highest standards of professional competence, fairness, impartiality, efficiency, effectiveness and fiscal responsibility.
- Avoid any interest or activity that is, or may be perceived to be, in conflict with the performance of job responsibilities.
- Accept the responsibility of stewardship of the public parklands we are entrusted to protect.
- Promote public interest and enthusiasm for our services while avoiding personal gain or profit from the performance of job duties and responsibilities.
- Strive for personal and professional excellence and encourage the professional development of associates and students.

## **200 CONTRACT POLICIES**

### **201 Contracts & Lease Agreements**

All contracts entered into by the County must meet insurance and indemnification requirements as determined by the Director of Risk Management. The office of Risk Management must sign off on insurance documents related to contracts as part of the contract approval process.

Special Permits issued by Westchester County require a Certificate of Insurance in the amount of \$1,000,000 naming the County of Westchester as additional insured on the actual date of the event. Special permits are required for: tents, air bounces, dog shows, small carnival games, cycling events, walkathons, regattas, horse shows, and orienteering programs.

## **202 Permits/Reservations**

Permits are required for certain uses of Park facilities.

- Picnics: Groups of 26 people or more are required to have a permit prior to their outing.
- Athletic Fields: Certain parks have athletic fields which may be reserved for a fee. These include Blue Mountain, Croton Point Park, Croton Gorge, and Tibbetts Brook Park.
- Special Permits may be granted at the discretion of the Commissioner or his designee for park uses that fall outside of normal park functions.

## **203 Photo Shoots**

- Any commercial photography (still or motion), film-student project, and any non-commercial “for-profit” photography to be done at County Parks is fee-based and must be authorized by the Westchester County Film Office.
- Wedding-photo shoots require a permit from the PRC Permit Office.

## **204 Procurement Policy (Contracts)**

The County’s Procurement Policy, originally adopted by the Board of Legislators in 1992, and subsequently revised, requires the following for procurement not subject to the NYS General Municipal Law as it relates to competitive bidding:

- For contracts less than \$35,000:
  - at least three proposals should be obtained
  - proposals may be oral or written
- For contracts between \$35,000 and \$75,000:
  - at least three proposals should be obtained
  - proposals must be in writing
- For contracts \$75,000 and over:
  - at least three proposals should be obtained
  - RFP (Request for Proposal) with specifications must be written
  - Responses must be in writing
  - RFP process should be coordinated through the Board of Acquisition & Contract
- Exemptions: A procurement that is not subject to competitive bidding may also be exempt from this Procurement Policy if the procurement involves specific types of services.

**205 Vehicle or Equipment Lease**

Lease or rental of vehicles and equipment follows the field requisition process.

- Requisition is submitted with recommended vendor;
- Bureau of Purchase secures bids for the lease or rental;
- Bureau of Purchase awards bid and required date of delivery;
- PRC Finance encumbers the funds;
- Upon delivery, funds are released to the vendor

**300 PROGRAMS AND SERVICES**

**301 Facility and Program Standards**

Managing risk for PRC programs, services and the facilities that host those programs, is a key component of the PRC Risk Management Plan. While eliminating all risk is not feasible, every effort is made to balance the risks inherent within the programs and services with good choices in dealing with those risks. Risk appraisal and management is part of the planning stage of all programs and services.

- Identification of the types of risks include the site location; who is conducting the program, whether it is PRC staff or an outside vendor; transportation concerns; environmental issues and infrastructure.
- Risk assessment determines the probability and potential severity of each of the identified risks - from low to high, as well as the financial impacts.
- Once risks have been identified and assessed, risk response strategies will determine what can be done about the risks.
- An operational plan to manage the identified risks is then set forth.

**302 Health Department Codes**

- PRC operates programs that require a permit from the Westchester County Health Department. All camp programs have a safety plan that follow the regulations of the Health Department. The First Aid & CPR certifications, site evacuation, fire drills, etc are all included in the safety plan.
- Permits are necessary for the opening of PRC pools and beaches and set operational standards, lifeguard ratios and safety regulations.
- Public Water Supply at various PRC facilities requires a Health Department permit and water sampling on a regular basis.
- Food services that contract with the County or operate at a County event must have a Health Department permit.

**303 People With Disabilities**

- All reasonable accommodations are made by the PRC at facilities and within programs to include people with disabilities. Handicapped parking and accessibility is available at most PRC locations. At summer concerts, where

the event is a distance from the parking area, a van is available to transport those who would have difficulty walking the distance.

- Special programs are scheduled during the year targeting people with disabilities as the primary audience.
- PRC opened a playground at Saxon Woods Park for disabled children, and as pools are renovated they have zero depth entrance points to assist those who need the accommodations.

#### **304 Playground Safety Standards**

- PRC Playgrounds are designed to meet the current ASTM Standards.
- Several PRC staff are certified Playground Safety Inspectors and coordinate the inspection program at our facilities. The schedule of playground inspections is posted on the internet on the Shared drive on a weekly basis.

#### **304 Program Registration**

Participation in fee based programs requires the participant or parent/guardian to fill out a registration form. Depending on the type of program, the form may require permission to administer first aid, transport to the nearest hospital in an emergency or for medication to be kept at camp with standing doctors' orders.

#### **305 Publicity Pictures**

Pictures taken for PRC publicity purposes, either by the County photographer or by a press photographer, must have written permission from any person included in the photograph, or from the parent of a minor.

#### **306 Special Events**

- Events that draw large numbers of participants require specific risk management considerations including, crowd control, security, contingency plans, communication, public safety and media involvement. PRC Bicycle Sundays involve cooperative efforts with the Department of Public Works and the County Police.
- Seasonal services, such as pools and beaches, have risk factors addressed by County Health Codes. Crowd control measures and evacuation plans are in place as well. At high volume parks a Special Safety Officer will be assigned to the park, pool or beach for the season.
- Parking at special events requires hiring and training individuals to assist with safety in designated parking areas.

### **400 HUMAN RESOURCES POLICIES**

The Westchester County Department of Parks, Recreation and Conservation makes every effort to provide a positive and safe environment for its employees, one that is free from any type of harassment, violence, drug-use or discrimination.



Safety training and personal protective equipment are provided to ensure the physical safety of all employees.

**401 Affirmative Action/EEO**

Please refer to Executive Order No. 5 - Equal Employment Policy (Appendix II)

- Westchester County's Department of Parks, Recreation and Conservation will provide equal opportunity to all individuals in its personnel and employment practices. In accordance with federal and New York State Human Rights laws, the County of Westchester prohibits discrimination because of race, color, sex, national origin, religion, age and disability in all employment practices including hiring, firing, promotion, compensation and other terms, conditions and privileges of employment. Furthermore, contractors with Westchester County shall be required to meet EEO/Affirmative Action requirements.
- The responsibility for the coordination, implementation and administration of the County's Equal Employment Opportunity & Affirmative Action Policy is vested with the Director of Equal Employment Opportunity (EEO)/Affirmative Action.
- The Department of Parks, Recreation and Conservation has a designated EEO/Affirmative Action Compliance Officer, namely the Assistant Director of Administrative Services, who is responsible for implementing the EEO/Affirmative Action Plan for the PRC.
- Discrimination complaints are an obligation of the employee whether the incident affects them or another employee. Discrimination reports will follow procedures set forth in Article IV of Westchester County's Equal Employment Opportunity Policy and in the Workplace Violence Policy and Procedures Plan.

**402 Background Checklist/ Fingerprinting**

A background check and documentation form is required for all prospective Westchester County employees. Checklists are provided and must be completed prior to appointment. Fingerprinting is performed on all new full-time and part-time employees under age 17. No offers of employment may be made prior to the completion of the pre-clearance/background check process.

**403 Disciplinary Action**

For Permanent Competitive Employees and Non-Competitive Employees with more than five years of service, decisions and procedures relating to disciplinary action and appeals from disciplinary proceedings must conform to the provisions of the Civil Service Law (Sections 75 & 76).

**404 Drug Free Workplace**



It is the policy of the Westchester County Department of Parks, Recreation and Conservation to maintain a drug-free workplace. This commitment results from the concern for the health and wellbeing of our employees and the recognition of our unique responsibility as public employees to maintain the highest standards when conducting public business. The Employee Assistance Program (EAP) offers confidential help to any employee with a drug problem, or any other problem – alcohol, financial or personal – with which the employee might be faced.

**405 Drug Testable Positions**

There are positions within the PRC that are subject to drug and alcohol testing, including pre-employment drug testing. The qualifying positions are certified by the Personnel Officer and include safety sensitive employees whose job responsibilities require a commercial driver's license. The drug testing procedure is set by union contract and performed by a Third Party administrator.

**406 Recruitment**

- Westchester County PRC actively seeks the employment and advancement of qualified individuals regardless of their race, color, sex, national origin, religion, age, sexual orientation or disability. To this end Department Heads will actively recruit and promote to reflect in its workforce, the basic composition of the County's general labor force.
- The Westchester County Department of Human Resources is responsible for administering civil service for the County of Westchester. In accordance with the provisions of the New York State Civil Service Law, recruitment for examinations is done through the examination process

**407 Selection Process**

- The interview process for potential candidates to a position with the PRC shall include no less than three and no more than five members appointed to an interview committee. Members may include representatives from the different Divisions.
- Permanent appointments occur when an appointment is made from a civil service list to a competitive class title, subject to the successful completion of the required probationary period. A provisional employee who has passed the appropriate examination must be within the top three candidates in order to be appointed without going through the canvassing procedure. Appointments to positions in the labor classification are not required to take civil service examinations, but must successfully complete the probationary period.
- If there is no valid eligible list, the Appointing Authority may recruit a qualified provisional, i.e., one who meets the minimum qualifications as stated on the official job specification. Provisional appointments made within sixty

days of the expiration of the cleared certification are not subject to re-canvassing of the eligible list.

**408 Probationary Period**

Every permanent appointment begins with a probationary term of not less than 12 weeks nor more than 52 weeks. During the probationary period the appointee's supervisor observes and evaluates the conduct, quality, quantity and value of the work performed by the appointee. At any time after the completion of the minimum period of service, a permanent appointment may be made, or the appointee may be terminated from the position if the conduct or performance of the probationer is not satisfactory.

**409 Probationary Evaluation**

Quality of performance during the probationary term is a key factor in achieving permanent status. A supervisor is expected to evaluate an appointee's performance and to give direction and feedback on a regular basis. As the end of the minimum probationary term approaches, notification will be made to the supervisor who will provide an evaluation and recommendation of the appointee to his Director. The PRC Commissioner will make the final determination regarding permanent status of the appointee.

**410 Separation Procedure**

There is a procedure in place to ensure that employees separating from Westchester County employment are informed of their rights for extension of health care coverage under COBRA, and any other benefit coverage issues, and that all property belonging to Westchester County is returned and acknowledged for audit purposes. A separation checklist is provided and is the responsibility of the employee's immediate supervisor. Employees who are fired or "terminated for cause" do not receive the "Separation Resource Sheet." The employee will return all County property to his/her supervisor and both will sign the bottom of the form.

**WORKER SAFETY POLICIES**

**411 Protective Equipment / OSHA Standards**

- Westchester County Department of Parks, Recreation and Conservation makes every effort to safeguard its employees against any potentially harmful working conditions. To meet the Occupational Safety and Health Administration (OSHA) standards for personal protective equipment, PRC employees will be provided with the necessary protective equipment to perform their duties in safe and healthful conditions based upon the assessment done for each park or facility.
- Protective equipment (including personal protective equipment for eyes, face, head, and extremities), respiratory devices, and protective shields and barriers shall be provided, used and maintained in a sanitary and reliable condition

whenever necessary, to minimize potential contact with hazardous materials or environmental conditions.

- Every facility manager is responsible for providing personal protective equipment to employees at his own facility.
- Employees shall protect themselves from hazardous environmental conditions by wearing protective equipment provided to them. It is the employees' responsibility to keep any equipment provided to them in a sanitary and reliable condition. Once provided, any problems with equipment, need for repair, or need for replacement must be brought to the attention of the site supervisor by the employee. The supervisor will provide proper equipment as needed.

**Supervisor Responsibilities:**

- To purchase on LPO or submit requisition for personal protective equipment needed at their site;
- To provide protective equipment for the employees at their site;
- To properly train, or send the employees for training, in the proper use of protective equipment;
- To see that employees use the equipment;
- To supervise the proper use of the equipment

**Employee Responsibilities:**

- To protect themselves against environmental hazards;
- To learn proper use of protective equipment;
- To wear personal protect equipment as required by task or environmental conditions;
- To bring any problems with equipment to the attention of their supervisor

**412 Worker Right to Know/Hazardous Material**

The purpose of the PRC Hazard Communication/Worker Right to Know Program is to ensure that all facilities are in compliance with the OSHA Hazard Communication Standard (HCS). The Facility Manager is responsible for coordination of the program at their location and the Hazard Communication binder. Every employee is apprised of the HCS, the hazardous properties of materials they work with and the measures to take to protect themselves. (Appendix III)

**413 Workplace Domestic Violence Policy**

Please refer to Executive Order No. 2 of 2003 – Domestic Violence in the Workplace Policy (Appendix IV)

**414 Zero Tolerance/Anti-Harassment Policy**

Please refer to Executive Order No. 6 - Anti-Harassment Policy (Appendix V)

- Westchester County PRC maintains a zero tolerance policy towards all forms of harassment or discrimination toward its employees by co-workers, supervisors, vendors, contractors, members of the public or others having a relationship with the County. Any conduct that creates an intimidating, hostile or offensive work environment is prohibited.
  - The dignity of every individual is recognized by the PRC, including the right of all people to equal opportunity and a workplace free of all forms of harassment or discrimination.
  - All PRC employees are expected to comply with this policy and to take appropriate action so that such conduct does not occur. Supervisors have a special duty to maintain a workplace free of all types of harassment or discrimination. This includes discussing this policy with subordinates, other employees and non-employees. Corrective action, as appropriate, will be taken promptly whenever such conduct is identified.
- 415** The *Workplace Violence Prevention Program and Procedures Manual* provides information to managers, supervisors, and employees about preventing and responding to incidents of workplace violence or threats of violence and the “New York State Public Employer Workplace Violence Prevention Law.”

## **500 SUPERVISORY FUNCTIONS**

### **501 Supervision of Staff**

PRC chain-of-command is clearly set forth from the labor force to the Commissioner. Supervision of personnel at every facility is defined in the organizational chart for the location, as well as where the facility fits into the overall PRC organization.

### **502 Fiscal Accountability/Handling of Money**

Fiscal Responsibility of PRC

- Honesty, by ensuring that staff knows what is expected of them and receives appropriate financial and ethical training.
- Accountability, by ensuring that cash-handling system is simple, comprehensive, consistent, fully documented and regularly reviewed, and that the line of responsibility is clear.
- All irregularities in cash management will be fully investigated.

### **503 Cash-Handling Procedures**

The PRC Administration Division has developed procedures to safeguard the assets of the Department, ensure accurate accounting data and prevent, detect and correct error or fraud. Cash is considered to be any type of payment including coin, currency, checks, money orders, credit cards and electronic funds transfers.

## Control Elements

### 1. Segregation of duties

- An employee will not be made responsible for all steps in the cash receipt and recording process. Duties will be assigned so that the work of one individual is checked by another.
- Cash Reports will be reviewed by a supervisor with careful agreement of amounts reported to actual totals. Any discrepancies will require full explanation and documentation.

### 2. Cash receipt and recording

- Park Passes, golf reservations, and most pool, beach and parking passes are processed on the computer through the Point of Sale System and are tracked by the Administration Division. Cash reports with deposit slips are submitted to the Administrative Office on a regular basis. The Point of Sale Program provides efficiency, ease of record-keeping, accountability and important data for managing PRC services.
- Parking Passes not on the Point of Sale System are provided using tickets sold in sequential order. The starting and ending numbers are recorded and reconciled daily.
- Group reservations and summer programs are recorded and accounted for through the RecTrac Program Registration Software in the Administrative Office.
- Receipts for cash transactions are written in triplicate copy. One part is given to the patron, making them an involuntary auditor. One stays with the facility and the other accompanies the deposit slip.
- Checks are to be endorsed immediately upon receipt and all bills twenty dollars and higher must be checked with a counterfeit pen prior to acceptance.
- Cash should be deposited in the safe rather than allowed to accumulate in a lock-box or drawer and must be locked up when cashier is not present.
- The lock-box or cash drawer should be out of public reach.
- The safe should be kept locked at all times and only accessible to supervisory personnel.
- Cash should be counted by two employees including the one who will reconcile the number of tickets, passes, reservations and the cash.
- Accountability is established by the Supervisor each time cash is transferred.
- Each day's receipts are to be deposited without delay.

### 3. Preparation of Deposits

- Cash must be counted, sorted and wrapped by denomination. All cash receipts must be listed on an official PRC Westchester County deposit slip.
- Most deposits are picked up by armored car. All other deposits are hand-delivered directly to the bank by supervisory personnel. If it is after hours, an official night deposit bag must be used. County Police may be called to escort personnel to the bank, if needed.
- If cash is being delivered to the Administrative Office, the person delivering must wait for a receipt. No cash is to be left on a desk; it must be handed directly to a finance employee for deposit into the safe.

### 4. Documentation

- All tickets, passes, permits, coupons and reservations must be officially accounted for and documented to the Administrative Division.
- Cash reports and deposit slips must be submitted to the Administrative Division in a timely fashion.
- The report must be signed by the Cashier and the Supervisor/Manager.

### 5. Training

- It is imperative that qualified staff receive adequate training in the current policies and procedures of PRC fiscal responsibility and understand that strict adherence is required.
- Managers and Superintendents should take part in the training and regularly review the performance of staff.
- Training should take into account robbery prevention and personal safety.

### 6. Supervisory awareness

- Be aware of variations, what is expected, and compare data to previous year.
- Insist on explanations for significant cash shortages and be aware of small-dollar cash discrepancies.
- Because most PRC revenue is weather contingent, conditions should be logged on a daily basis and included in reports.
- Periodic site visits should be made by PRC finance staff to review procedures and provide input for employees handling money at field locations.

## **504 Management of Public Behavior**

- Rules and regulations for each facility are posted for the public to read upon entrance to the location. Visitors are expected to abide by posted rules for their own safety and for the best interest of all visitors.

- The consumption of alcoholic beverages is prohibited in all parks, except as specifically permitted and designated by the Permit Office under the authority of the Commissioner of PRC.
- If a serious problem occurs the Facility Manager calls the County Police. The Westchester County Department of Public Safety provides officers who regularly patrol the parks primarily in vehicles and are on call 24 hours a day to address any special situations and needs. In addition to regular County Police patrols, during the high volume season, precincts are established in all of the major regional parks. The force consists of 2 sergeants, 7 police officers, several summer Park Rangers.

Ordinance #5 / The Laws of Westchester County set forth many of the rules and regulations regarding citizen behavior that impact public safety.

#### **505 Procedures for Managing Disruptive Behavior**

The chain of command for any serious incident is the same at every facility owned and operated by WCPRC. These facilities include golf courses, pools, parks, beaches, Playland and the County Center. All follow the same course of action:

- Depending on the incident, the “frontline employees” secure the area and attempts to handle the disturbance.
- The Facility Manager is contacted, who in turn, appraises and deals with the situation.
- If this isn’t effective, the Facility Manager or his/her designee immediately contacts the County Police. If the incident demands immediate medical attention, 911 is called. The Facility Manager immediately contacts the Division Director who then calls up the chain of command as appropriate.
- A Patron Incident Report is completed and forwarded to the Administrative Division as soon as possible.
- At Playland, during their open season, there is a County Police post established at the Park, as well as an EMT on duty during the hours the park is open to the public.
- Supervisors and their assistants are provided radios/phones so they are able to contact the County Police directly, as well as their supervisor. Every facility also has a list of all cellphone numbers.
- Westchester County Charter section 273.51 authorizes the Westchester County Department of Public Safety as the law enforcement at all County facilities.



## **600 EMERGENCY PLANS AND PROCEDURES**

### **601 Accident/Incident-Reporting Policy**

In the event of an accident/incident, the Chief of Operations or his/her representative after review of the verbal or written report, will determine the seriousness of the incident/accident and follow procedural steps. All accidents resulting in bodily injury to any person, whether or not employed by the County, and all incidents resulting in property damage, or destruction or illegal taking of County property, shall be reported immediately to the Director of Risk Management, who will advise the County Attorney.

### **602 Accident/Incident-Reporting Procedures**

- Do not make any statement concerning fault or discuss payment of any bills or expenses relative to the accident/incident. Advise the person to contact Risk Management or the County Attorney's Office for information.
- Incident/Accident Report Forms relating to Patron Incidents, Worker's Compensation and Report of Accident Form for Automobile Liability are received in the PRC Administrative Office and forwarded to the Finance Department and/or the Office of Risk Management for further processing and recording.
- Patron Incident/Accident Report forms are completed by the facility manager for any person injured on park property that is not an employee or an employee not on duty at the time of the incident, or for any personal property damaged while on park property. The completed form is submitted electronically to the PRC administrative office, where it must be forwarded to the Director of Risk Management within 48 hours. Any accident/incident that required police involvement must include the police report number along with a copy of the report within five days of the incident.
- The filing of a Patron Accident/Incident Report Form with the County does not automatically mean that the County is responsible to pay the claimant for damages. The claimant is responsible for filing an "Independent Formal Notice of Claim" (Form T-1183) with the County Attorney's Office within 90 days of the incident. Bills must be attached and all papers notarized. Telephone calls from the claimant should be directed to the County Attorney's Office.
- Workers Compensation Claim Forms (EN-04 – Employee Injury and Illness Report) are filled out by the Facility Manager for any county employee injured while on the job and forwarded immediately to the PRC Administrative Office.
- The Facility Manager should contact the Division Director immediately if a PRC employee is injured on the job and requires emergency care.
- Incident Report Forms filed for stolen or vandalized equipment must be complete and accompanied by a Police Report within 2 business days after the incident. Division Directors must be notified immediately of all thefts and major vandalism. These forms are available on the intranet cww/parks.

## **603 Chemical Spill Procedures**

In the event of a chemical spill at any Park facility or property, these procedures should be followed:

Evaluate the situation and protect public safety

- a. identify the problem
- b. secure the area, evacuate the public, and protect employees

Identify the severity of the problem

- a. check the container label
- b. check the Material Safety Data Sheet

Call the following people to report the spill:

- a. your immediate supervisor
- b. the Deputy Commissioner of Conservation
- c. the Health Department

Contain the spill

- a. if the chemical is a commonly used one (such as motor oil), and after reading the MSDS, contain the spill by applying an absorbent (e.g., Kitty Litter), especially if the spill is threatening to enter a drain or water body, or contaminate soil.
- b. if the chemical is flammable, notify the Fire Department.
- c. If the spill is of an unknown substance, wait for guidance from the Health Department, but safely prevent spill from entering a water body.

Do not flush chemicals into drains or toilets

Do not expose yourself or others to fumes or contamination

Contact the DEC within 2 hours of discovering all spills (1-800-457-7362). Contact the U.S. Coast Guard if the spill is in the Hudson River or on Long Island Sound (1-800-424-8802).

(Playbook Appendix II – Spill Response)

## **604 Crisis Management**

- The first effort the PRC makes is mitigation, all practical attempts to avoid or reduce risk in serious emergency situations.
- Training and preparedness for potential emergencies include both fulltime and seasonal PRC staff, coordination with other agencies (police, fire, public works, etc) and designation of a lead agency.
- Response to an actual emergency is performed by trained personnel and will include a member of the PRC Public Information Office. Designating roles is essential in handling a crisis. Lifeguards performing CPR cannot handle crowd control or deal with a family member. The Facility Manager will call his/her director who will inform the Deputy Commissioner of the situation.

## 605 Emergency Evacuation Procedures

### Building Evacuation

- In the event of a fire or other emergency (including a bomb threat), evacuation of personnel may be crucial to life safety. These procedures help ensure a quick and orderly evacuation. For large-scale disasters follow the directions of the Office of Emergency Management.
- For each facility, a Fire Warden and one alternate shall be appointed to serve as communication link with the Fire Department. They will wear armbands in an emergency so as to be easily identifiable.
- In the event of a fire or other emergency, the Safety Officer or Fire Warden shall direct the evacuation of the building in accordance with established procedures.
  - a) In the event of a fire, the person discovering the fire will immediately pull the nearest fire alarm or call 911. For other emergencies, the employee shall notify his/her Supervisor, who will take the appropriate action.
  - b) In the event of evacuation, **do not use elevators**.
  - c) The Fire Warden will:
    - select the safest evacuation route, and check the status of any exit prior to entering.
    - make sure all occupants of the building are notified.
    - assemble disabled persons in the designated area so that firefighters may evacuate them immediately if necessary.
    - direct persons to move quietly and as quickly as possible, without running, to a sidewalk 300 feet from the building.
  - d) Once the building has been declared safe to re-enter by the Fire Department, the Fire Warden will relay this information to all persons.

Fire drills to practice building evacuation are executed several times a year. Fire drills during any camp program are required by the Health Department and are performed on a regular basis as the code dictates.

### Site Evacuation

Should it be necessary to vacate a PRC facility due to impending severe weather, power outage or other emergency;

- The Facility Manager will utilize a PA system, if available to calmly notify visitors that the facility needs to be vacated giving the reason why, if appropriate.
- Site staff will be utilized to contact visitors and inform them of the evacuation in progress.
- The Department of Public Safety will be contacted, if necessary.
- The Facility Manager will contact with his/her Director.

## 606 Injury to Visitors

Many PRC employees are trained in First Aid, CPR and use of an AED and every facility has first aid supplies available.

- Only trained staff should render first aid to a visitor or co-worker.

- For minor injuries, the parent or patron will be offered first aid supplies (Band-Aids, bee-sting wipes, etc) to treat the injury.
- The site supervisor is responsible for calling 911 in the event of a more serious accident or injury.
- All accidents or incidents to the public are to be recorded on a Patron Accident/Incident Form and submitted to the PRC Director of Administrative Services who forwards it to the Division of Risk Management.

**607 Large-Scale Natural Disasters**

The Office of Emergency Management handles large-scale natural disasters for Westchester County. Cooperating agencies include the Departments of Health, Social Services, Parks, DPW, Transportation and the American Red Cross.

- Standard operating procedures have been established for nuclear and non-nuclear emergencies.
- Evacuation routes have been established and posted.
- Depending on the type of disaster PRC facilities may be utilized as a holding area for materials, parking lots for relief equipment or evacuation sites.
- Parks may be used to store supplies in anticipation of a potential disaster.
- PRC employees have been trained to assist in manning the County's Emergency Operations Center in the event of a disaster.
- Psychological aid for staff affected by an incident or disaster is provided through the Employee Assistance Program.

**608 Lost Person Procedure**

After searching for 15-20 minutes in the last known location:

- Call 911 and the County Police at 864-7700
- Call your respective Director
- Call your respective Deputy Commissioner
- Fill out a Missing Person Form in order to gather necessary information for police.
- Have ready site maps, radios, rain gear, flashlights, batteries and phone numbers of all staff who might assist in a search.

**609 Release of Minor to Proper Parent/Guardian**

If a minor is in the care of the PRC due to a camp program, recreation program or for any other scheduled event;

- An application form for the program must be filled out and signed by the parent or guardian.
- A contact person with phone number must be provided, in the event of an emergency when the parent/guardian is not reachable.
- Written permission from the parent/guardian must be given to release a minor to anyone other than the parent/guardian.
- If an order of protection is in place, the program director should be made aware of it and a copy made available, if requested.

## **700 SAFETY AND SECURITY**

### **701 Computer Data Protection**

- Westchester County's Information Technology Department makes every effort to ensure that County computers are protected from viruses, and backs up data that is stored in the system (S and U drives) each night so it will not be lost. If you have important data saved on your computer hard drive and nowhere else, it is important to back it up on disk or on the U drive so that it will not be lost and you will not spend precious time recreating lost files and documents.
- Westchester County provides Internet services for its employees to support work-related communications and exchange of information. Electronic communication is encouraged; however, Internet service is a privilege and brings with it a responsibility. Employees shall limit use of the Internet to work-related research and projects during work hours. No employee is authorized to visit any inappropriate website and will be subject to disciplinary action if done.
- County computers and any data stored in them are the property of Westchester County, and may be accessed as such. Employees will not have privacy for any use of County computers.
- All computer software must be bought and installed by the County. Employees are not authorized to add, delete or alter programs or software on County computers.

### **702 Encroachment of Parkland**

Boundaries for most parklands are posted and are patrolled during ongoing and routine management activities to identify encroachment or vandalism. Encroachment is most typically found along right-of-ways and small areas of parkland in residential areas. When evident encroachment exists, the established Encroachment Procedures are followed.

### **703 Environmental Concerns**

Areas of parkland that are not manned on a regular basis, but are open to the public for hiking, biking or cross-country skiing, will be monitored on a regular basis. Signage will include safety precautions i.e. no swimming, skating, etc, and hours open. Parking will be made available for public safety. Anything out of the ordinary should be reported to the Facility Manager responsible for the particular park as soon as possible. The Facility Manager will investigate and call the Division Director immediately. Other County Departments and State Agencies will be advised in situations that warrant such action, including spills, health hazards, etc.

**704 Pride in Parks Inspection Program**

On a regular basis the Pride in Park's inspector reviews each facility and documents areas of concern, as well as areas that are especially pleasing. The pictures and inspection review are presented to the management staff at their regular meeting with the site supervisor and any staff present. Any safety concerns must be addressed immediately, with assistance from General Maintenance if necessary. Deterioration that needs to be addressed through the Capital Budget is discussed as well.

**705 Responsibility for Agency-owned Equipment and Property Policy**

Every employee is held accountable for any County-owned property entrusted to his or her care.

Procedures: As part of on-site orientation the importance of taking proper care of all equipment is stressed. Employees are expected to:

- Put all tools in their place when not in use
- Lock the building or closet where equipment is kept when leaving
- Maintain equipment according to instruction manual
- Keep radios clipped or in attached pouch
- Charge radios
- Leave vehicles locked
- Sign for any fuel pumped
- Check fluid levels of vehicles and equipment, including office copiers, etc. regularly
- Have all equipment in ready condition
- Adhere to vehicle maintenance schedule from County Garage
- Use all Personal Protective Equipment and keep it in operational condition at all times.

All site managers are required on a bi-monthly basis to maintain an inventory of vehicles and equipment on the PRC shared drive (folder: Playground and Equipment).

**Protection of Equipment:**

- Equipment and supplies at each facility must be stored in locked rooms.
- Maintenance shop areas are restricted to staff, with keys being assigned to appropriate personnel only;
- Specialized training is given to staff, including seasonal staff as appropriate, to ensure the safe and proper use of equipment, such as chain saw safety, trouble shooting electric, including lock-out/tag-out procedures, trouble shooting plumbing and small engine repair, as well as certification for pesticide application.
- Commercial drivers licenses (CDL) are required in some job specifications to ensure proper training for vehicle use.

**706 Safety and Loss Prevention Program**

- All employees are expected to cooperate with the County Risk Management Office in implementing a Safety and Loss Prevention Program. This program is designed to reduce accidents which could cause injuries to County



employees or to the public, and to reduce the frequency and severity of property losses.

- The Safety and Loss Prevention Program will consist of making periodic inspections of facilities, investigating the causes of accidents and property losses, developing training programs for employees, and distributing safety literature to all departments. Division Directors are responsible for posting such literature.
- The Risk Management Office shall make use of the services of professional insurers, brokers, and departmental safety personnel with input from field employees, to develop better safety and loss prevention procedures.
- Facility Managers will do daily inspections of their sites to ensure the safety of employees and the public. All employees shall immediately bring any observed unsafe conditions to the attention of their supervisor.
- Management and accountability for County-owned property is handled in several ways: numeric codes, fleet numbers on vehicles and equipment of specified value, monitoring of fuel usage, site inventory, and staff orientation.
- Assigning numeric codes to each item and identifying the employee to whom it is distributed, provides accountability for some County-owned property. Nextel radio/phones, computers, printers, vehicles, and fleet equipment purchased through the County Garage are all assigned numbers with an identifiable employee responsible for the particular piece of equipment.
- Supplies and inventoried items are kept in non-public areas and are kept locked when not in use. Maintenance shops house valuable equipment, tools and supplies. Keys are accounted for and distributed to authorized personnel only. Keys to vehicles and equipment are kept in a lock-box and accounted for on a daily basis.

#### **707 Safety Policy and Procedures for PRC**

The safety of visitors who come to our facilities is of primary concern. Every effort shall be made to provide an enjoyable and safe experience by mitigating risk, informing the public of behavioral expectations and performing regular safety inspections.

Procedures: Safety inspections for PRC facilities include the following:

- All exit lights are working and exits are not blocked
- All walkways and pathways are clear, and sanded / salted if necessary
- Daily inspections required for the operation of a pool, beach or amusement park are accurately followed
- Fire extinguishers are working properly, identified and inspected regularly
- First-aid kits are readily available and refilled after use
- Identifying and remedying any potential trip or slip hazards



- Line of sight for vehicles entering, exiting and moving within the park is properly maintained (Think height of car seat, not truck you are driving)
- Non-public areas are clearly identified, and secured if possible
- No tools or power equipment are left unattended
- Parking lots are plowed / sanded if necessary
- Playgrounds are regularly inspected according to current Playground Safety Standards
- Restrooms are checked regularly for sanitary conditions
- Signage regarding safety is prominent and clearly stated, i.e. wet floor, no ice-skating, beach closed, one-way, etc.
- Staff is in uniform and easily identifiable to the public, should there be a problem
- Trails are marked and trail maps available where possible, to reduce the risk of lost hikers
- Unattended County vehicles are left in a non-public area and are locked

PRC personnel regularly check playgrounds and staff, certified in playground safety, inspect playgrounds in County Parks and act as a resource to park staff with regard to Playground safety standards.

#### **708 Security Procedures**

Security refers to the protection of property and assets entrusted to the custody of the Westchester County PRC. Facilities within the Department vary, but the common ground is the protection of property and assets.

- Opening procedures at each facility will include checking to see that doors are locked, alarms on, vehicles parked in place, lights on, and no vandalism has occurred, prior to unlocking, unsetting the alarm, etc.
- The perimeter of every facility, whether it is a pool, beach, park, or indoor facility must be maintained and inspected daily. Broken hardware, locks, chains and fencing must be repaired immediately and a log kept of such repairs.
- During public visitation hours no County vehicle will be left unlocked and unattended in public areas. All tools, equipment and materials not attended will be removed from public access areas or the area cordoned off and hazardous items removed.
- Fuel pumping stations shall be locked when not in use and a log kept at each location to account for usage.
- Facilities having security and fire alarms must have an outside agency inspect and repair the systems on a semi-annual basis. Fire extinguishers will be clearly marked and checked on a regular basis. Spent extinguishers will be immediately recharged or replaced. Arrangement for yearly inspection by a contracted company is the responsibility of the Facility Manager, as is making sure that inspection tags are placed on the equipment.
- Facility Managers will train all site staff in closing procedures, including but not limited to:
  - a) depositing all monies in a safe, or making a bank deposit

- b) turning on security lights and checking to see that they are working
- c) making sure all water is turned off: hoses, faucets, etc.
- d) checking bathrooms
- e) parking all County vehicles inside or within a secured area
- f) locking gates, doors, etc.
- g) securing all keys in a lock box
- h) turning alarm system on

Facilities having a night security guard must have in place a watch clock system to ensure that the facility is being walked during the hours when no supervision is available. A security log will be maintained, and a checklist of nightly responsibilities provided, including monitoring of alarm systems, extinguishing lights, checking restrooms for running water, securing all doors, and contacting personnel as necessary. Night security guards are also responsible for alerting police or fire departments in an emergency.

#### **709 Security Breach or Unusual Findings**

When in the normal opening of a facility, an employee finds a security breach, vandalism or other evidence of a suspicious nature, he/she should

- Immediately notify the facility manager.
- The employee should not enter the building or allow anyone else to enter the building.
- If the facility manager is on site, he/she will notify the police. If there is no manager immediately available the employee will call the police and the next person in the chain of command.
- In the case of a break-in or serious vandalism, the employee or supervisor will keep everyone else from entering the area until the police arrive.
- The employee should make sure that nothing is disturbed while waiting for police.
- In the case of vandalism in the form of graffiti, the employee should notify the facility manager and then proceed with the opening of the facility.

#### **710 Space Heater Policy**

**SUBJECT:** Use of Open-Element, Ceramic and Oil-Filled Space Heaters

**ORIGINATOR:** Department of Law – Office of Risk Management **October 2005**

**BACKGROUND:** This policy has been developed to protect Westchester County personnel, the visiting public and county property from the inherent dangers associated with space heaters. It has become necessary to re-state this policy due to the use of space heaters by unapproved employees and the practice of heaters being left on after hours; with one incident resulting in a fire. The procedures that have been developed are based, in part, on the National Electric Code (NEC).

**POLICY:** It is the position of the County leadership that no space heating devices will be permitted in County work site locations. **The only allowable exception to this policy will be in accordance with the 1990 Americans with Disabilities Act.**

**PROCEDURE:** In order to use a space heater, a waiver must be obtained by following the steps below:

1. A physician's written advice, attesting to the medical necessity of a space heater, must be provided to Risk Management and your department supervisor.
2. The manufacturer supplied device specifications, which accompany the heater when purchased, are to be provided to Risk Management for the device to be used.
3. If approval is given for space heater, a numbered, heater specific label will be issued and placed on the approved heater in an open, visible location. **\* THE ONLY SPACE HEATERS ALLOWED IN COUNTY BUILDINGS WILL BE HEATERS WITH THIS NUMBERED LABEL FROM RISK MANAGEMENT\***
4. Our preference for use is the **oil-filled type space heater**. This is the **safest** currently on the market. Other types (open-element, ceramic, etc.) will be considered on a case by case basis by Risk Management and DPW. All space heaters put into use must first be approved by Risk Management and bear the approval sticker.
5. *Use of heaters without the approval sticker will not be tolerated. Violators will be subject to disciplinary action.*

**USAGE:**

1. Manufacturers generally supply installation instructions with equipment. Therefore, "any listed and labeled equipment shall be installed, used, or both in accordance with any instructions included in the listing and labeling," NEC Article 110-3 (b)
2. All cords and plugs connected to electrically heated appliances rated at more than 50 watts and producing temperatures of more than 250 degrees Fahrenheit shall be provided with the approved heater cord listed in Table 440-4 NEC Article 422-8 (a).
3. Each electrical appliance shall be placed as to provide ample protection between the appliance and adjacent combustible material, NEC Article 422-10.
4. Space heaters shall not be hooked up to extension cords.
5. It will be **the sole responsibility** of the approved user to ensure the heater is turned off when not in use and at the end of every day. (This does not include the lowering of the heaters thermostat. The heater must be in the OFF position so it does not produce heat during non-work hours).

**710 Unusual Findings During Daily Routine**

If during an employee's daily work he/she finds a patron acting in an unusual manner, something suspicious, illegal or threatening, such as drugs left in a locker room or an explosive device, the employee should

- Immediately notify his/her supervisor who will call the police.
- Follow the County Bomb Threat Procedure in the case of an explosive device.

- Secure the area and keep anyone from entering or disturbing the area, in the case of illegal finding or suspicious substance.
- Radio for assistance as needed.
- Do not leave the area unattended.
- Wait for police to arrive and be prepared to answer questions regarding your findings and take appropriate action based upon the directions of emergency personnel .

## **800    TRANSPORTATION AND VEHICLES**

### **801    County Vehicle-Use Policy**

The operation of a County vehicle is a responsibility that is most serious in nature. An employee who operates a County-owned vehicle assumes a high degree of responsibility and is expected to respect this privilege when undertaking this task.

County employees must obtain written approval from the Risk Management Office and their Division Directors and are permitted to use County vehicles only for approved official purposes in the performance of their jobs. No employee will operate a County-owned vehicle without a valid driver's license. NYS Seat Belt regulations will be strictly observed by employees operating a County vehicle. Smoking is prohibited in all County vehicles.

### **802    Employee Driving-Privilege Procedure**

- A Division Director authorization is required before an employee may operate a County-owned vehicle. Designated departmental personnel shall complete a Request for Approval to Drive an Official County of Westchester Vehicle form for each employee seeking permission to drive a County vehicle.
- Risk Management will issue an approval or denial to PRC's Administration Division.
- An employee who receives a suspension, revocation, or restriction of their driver's license must notify the Office of Risk Management in writing through PRC's Administration Division. Failure to do so may result in action by the Division Director. The employee shall not drive a County vehicle under these conditions, nor operate a personal vehicle while on County business.
- It is the responsibility of the employee to submit the appropriate DMV documents to the Administration Division for submission to Risk Management for reinstatement.

### **803    Vehicle Maintenance**

- Preventive maintenance on all County vehicles is the responsibility of DPW. When a vehicle or piece of equipment is due for routine maintenance or inspection a memo is sent to the PRC Administrative Office and forwarded to the location responsible for that vehicle or equipment. The memo lists each

vehicle by fleet number and specifies the date it is due and at which County Garage facility.

- For efficiency there are also Roving Mechanics who do preventive maintenance work on-site for equipment like tractors, bulldozers, etc, and who are available in emergencies should a vehicle or piece of equipment break down.
- The staff at each location is responsible for checking fluid levels, tire pressure, cleaning, vacuuming and reporting problems with any fleet equipment to the County Garage.

#### **804 Private Automobile Use**

- The official use of personally owned vehicles for County business must be authorized in advance and shall be restricted to such cases where it is to the advantage of the County. It is the responsibility of the Division Director to prevent incurring additional expense through the use of personally owned vehicles when fleet or County cars can be used without undue delay in conducting official business.
- An employee will be reimbursed for use of a private car for County business only if a vehicle is not available from the County motor pool, or in special situations, or for health reasons. Use of a private car must be authorized beforehand by the Division Director or Deputy Commissioner.
- A certificate of insurance showing that you have at least \$25,000 property-damage liability and \$100,000/\$300,000 bodily injury liability must be on file with the Office of Risk Management, and should indicate the effective dates of the policy.

#### **805 Parking Safety**

- Each park has a different configuration and has its own parking plan. The plan also provides a resource for staff to use when planning large programs and events.
- Vehicular traffic may park in designated parking lots only. Parking spaces are marked, including an appropriate number of handicapped spaces for large events. Facility Managers meet with parking staff and County Police on a frequent basis to review current problems and plan for the future. When lots are full, barricades and signs are placed across entranceways.
- An appropriate number of parking staff is established prior to an event start, which reflects the expected number of attendees. At high volume special events County Departments such as DPW, County Police, and PRC join forces to ensure a safe public event. Occasionally local as well as New York State Police are used.


- During special events, or overflow conditions on a normal business day at a facility, additional areas, grass, access road and beaches are utilized to handle large crowds. Temporary lanes are drawn and signs are posted to maximize space for cars and to insure safe pedestrian crossings. County personnel on-site are utilized to handle the parking duties.

#### 806 Traffic Flow

- Traffic control is a key safety factor for all parks and park events. All parks are located on major or minor arterial roadways and during park development, traffic engineering and County planners determine a safe and efficient entry and exit of the park by car, bicycle or foot.
- Bicycle paths that cross roadways are signed for safety and traffic control, as are the parking areas offering access to the bike trails. Equestrian trails throughout PRC are also signed for safety.
- Traffic in the parks is confined to surfaced roadways and speed limits are defined in the Westchester County Charter-Section 765.701.
- Traffic control is of the utmost importance at every County facility. Each facility has at least one entrance and exit. There are signs posted to keep traffic moving and fire/emergency lanes open.
- PRC's policy puts the burden of private event organization and planning on the promoter. Crowd control, traffic control, sanitation, public safety, etc. are all the responsibility of the event organizer with PRC staff facilitation.

Approved by:

Kathleen O'Connor  
Commissioner – Parks, Recreation & Conservation

  
Signature

September 13, 2023  
Date