



Preparing the Workplace for COVID-19

An Infectious Disease Preparedness and Response Plan

I have received and read the following document. I understand that all questions should be directed to Alicia Butcher either in person, via email, telephone call or the Kazalia application. Upon receipt of this signature page, the time it took me to read this document will be added to my time card (if I am not already punched in and on the clock).

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Introduction to COVID-19

This is a respiratory disease caused by the SARS-CoV-2 virus. It has been designated as a Global Pandemic. It can cause illness ranging from mild to severe. Symptoms may appear within 2 to 14 days of exposure or not at all. Spread of the virus is possible before a person becomes symptomatic however, the most dangerous risk is exposure to symptomatic person(s). There is not a vaccine for this illness as of the date of this policy and procedure.

Exposure Risk Level for A&C Employees

Based on review of materials from MIOSHA and OSHA, A&C employees have a designation of medium to high-risk of exposure to COVID-19. Exact risk level may vary by each employee(s) job description and level of client assistance provided day to day. Known risk levels according to the CDC exist in those with older age, immunocompromised conditions, chronic medical conditions, pregnancy, etc.

Sources of Exposure

The first case was likely the result of human exposure to infected animals. However, infection is believed to typically spread from person to person who have close contact with each other (i.e., within 6 feet).

Routes of Transmission

Respiratory droplets are produced during coughs and sneezes. These droplets can then land in the mouths or noses of those nearby. There is some thought that you can also be exposed by touching surfaces or objects with the virus on it then touching your eyes, mouth, nose, etc.

Employees of the business may be exposed to person(s) from the following sources:

- The general public (i.e., vendors cold calling our office to sell their goods and services, contracted vendors, repair person(s), etc.)
- Recipients of services provided by the business (i.e., patients and their caregiver(s))
- Fellow employees of the business
- Independent contractors of the business
- Any person(s) with non-occupational risk factors at their home, social / family circle, and in the community due to their own need for goods and supplies

Unique Characteristics of SARS-CoV-2 (as compared to influenza viruses)

Symptoms: fever, cough and shortness of breath

Some cases can be asymptomatic, meaning a person may not experience symptoms at all.

There have been reports on non-respiratory symptoms however, there is not currently enough data to provide definitive guidance.

Description of Work Environment

A&C is a therapy clinic providing the following services:

- ABA therapy to clients
- Mental Health therapy to clients
- Childcare services to the children of our employees

The business (AKA therapy clinic or center) occupies approximately 24,000 sq foot of the building and is technically divided into 3 separate suites 200, 300 and 400.

The business space has been artificially separated into separate sections to allow for greater social distancing of employee/client combinations.

Current Work Conditions

We are working diligently to provide and secure ongoing sources of Personal Protective Equipment (PPE). Due to this pandemic, it is possible that our shipments can be delayed or cancelled without any notification to the business. Ownership is staying abreast of federal, state and local guidance to ensure maximum protection to recipients of all services provided by the business and our employees.

Existing Safeguards

All employees have been given the following and have signed off (or will sign off by 4/30/20) stating they both received and were trained on their use:

1. One pair of reusable gloves
2. 2 pairs per day of single-use gloves (however, extra gloves are available throughout the building and may be used at any time to replace soiled single-use gloves)
3. A form of face covering is allotted per week of work:
 - a. One procedure mask per day of work for a given week minus the number of cloth masks provided
 - b. 3-5 cloth masks that employees must wash after each day's use
 - c. 5-layer filter paper to be placed in the cloth mask are set to arrive on May 1, 2020 and were purchased on 4/24/20.
 - d. Ear guards or headbands to ease discomfort on the ears which must be washed by the employee after each day of work
4. We will be offering and encouraging all recipients of service (over 2 years of age) to wear age-appropriate masks as tolerated.

Workplace Controls

It unfortunately is not possible to remove COVID-19 to eliminate the hazard. However, we have taken a variety of precautions to ensure that the most effective protection measures are taken.

Engineering Controls

This control involves isolating employees from work-related hazards. We are taking the following steps and are working to ensure that they are in place prior to our recipients returning to the building. Physical barriers (i.e., sneeze guards) with a movable arm are being installed on all therapy tables. In addition, we are installing high-efficiency air filters throughout the building.

Administrative Controls

Administrative controls are those actions taken by both the worker and employer. We have taken the following actions:

- Temperature checks for all employees upon arrival and re-arrival to the building
- Encouraging sick employees to stay home
- Restricting certain symptoms to have a delayed time frame prior to return of 72 hours symptom-free
- Implementing tele-parent meetings to minimize the time parents are spending inside the building
- Socially distancing the lobby
- Socially distancing the center
- Temporarily discontinuing nonessential continuing education activities requiring travel
- Adding the Kazalia application and making it accessible by invitation to all employees to receive important workplace news in a prompt manner, as well as, giving employees via this app the ability to contact management throughout the work hours as well as after hours. Having the scheduling phone available to all employees for a response between the hours of 6 am – 9 pm daily.
 - Worker concerns can be presented to management via the Kazalia app or the scheduling phone at all times and we will respond as promptly as possible. The Kazalia app has made the CEO more readily available to field concerns and questions.
- Finding a COVID-19 testing and antibody site, distributing that information on 4/28/20 via Kazalia, and offering to pay for employee testing.
- Training on the building entrance and PPE procedures.

Safe Work Practices

Safe work practices are administrative controls that include procedures for safe and proper work reducing the duration, frequency or intensity of exposure to a hazard. We have taken the following actions:

- Preparation and dissemination of this document with signature or app notification upon review during your paid work time
- Posted hand-washing instructions in all bathrooms
- Made hand washing and sanitization stations available throughout the bathroom

Personal Protective Equipment (PPE)

Corrective use of PPE is to be used by all employees in conjunction with the other controls. PPE does not take the place of the prevention strategies discussed throughout this document. Gloves, face masks and respiratory guards are provided to all employees. Employees are required to wash their face masks after each use. We have deemed face shields and goggles to be unnecessary in our line of work, and they would also pose a distraction or potential threat during behavioral issues for both employees and our recipients.

KN95 masks and gowns are not being used based on the gubernatorial order reserving these for life sustaining lines of work, which our office does not provide. Further no one in our office who is **known** to have or have been exposed is being allowed into the facility at this time.

Your equipment should be replaced when it is damaged or in the case of single-use gloves, after individual use. Please help yourself to new single-use gloves as warranted by your work (i.e., incidental damage, prior to meal preparation, after toileting and diapering, etc). Should you need new face masks please see Alicia Butcher to obtain new ones. Employees have also received a belt-loop sanitizer. Please refill your sanitizer as needed using the hand sanitizer stations found throughout the building.

Employees are responsible for ensuring that their protective equipment is properly removed, sanitized, cleaned and stored to avoid contamination. Please always ensure that you are using the Universal Precautions taught to you during your CPR and First Aid training.

Identification and Isolation of Sick Person(s)

Prompt identification and isolation of potentially infectious people is critical to protecting our employees, visitors and recipients of our services.

We are requiring all employees to self-monitor for signs and symptoms of illness, particularly COVID-19. Employees and recipients of our services may not enter the building if they have had the following symptoms in the last 72 hours:

- Temperature over 99.9
- Cough
- Unexplained and excessive aches or pains
- Unexplained and excessive fatigue
- Nasal congestion
- Runny nose
- Sore throat
- Shortness of breath that is not explained by activity level

Any person that develops symptoms during their time in our building will be requested to leave or be picked up.

- Employees: Notify (734) 772-5354 and please leave the building. Notify administrative personnel on site of items that need to be sanitized.
- Recipients of Services: Employees are to notify (734) 772-5354 that the recipient is experiencing symptoms. The employee in possession of that line will then contact the family to pick the child up during the next 30 minutes following notification and let the caregiver know the date the child may return to service. The employee will then move the child into the “illness isolation room” (defined as the room next to the kid’s kitchen in suite 200) and close the door. The employee should make the recipient of service as comfortable as possible. Once the child is picked up, the employee must sanitize the isolation room and the child’s therapy room including all materials used.
- **NOTE NO MORE THAN 4 PEOPLE SHOULD BE IN THE ILL ISOLATION ROOM AT ANY ONE TIME AND 6 FEET OF SOCIAL DISTANCING SHOULD OCCUR BETWEEN EACH PAIR OF ADULT/CHILD COMBINATION**

We also requiring all employees to notify (734) 772-5354 if they are experiencing symptoms of COVID-19 or otherwise ill.

Basic Infection Prevention Measures

Protecting our workers requires all of us to do our part as individuals to minimize the risk of infection. The following information is set forth to describe an individual's basic requirements while at work.

Handwashing Requirements, Locations and Stations

There are 6 restrooms and two kitchens in the facility. Each of these 8 areas serves as a handwashing station. Handwashing instructions have been posted in each area.

Employees must follow the handwashing procedures described which are based on CDC best practice.

Employees are to wear gloves at all times. However, employees must wash their hands at the following times:

- Prior to meal preparation
- After touching the face
- After using the restroom
- After diapering a recipient
- After toileting a recipient
- After handling an emergency situation
- After exposure to a Bloodborne Pathogen

Employees are encouraged to wash or sanitize their hands at any other time they choose and frequently throughout the day.

Hand Sanitization Requirements, Locations and Stations

Hand sanitization is not required at any time. However, it is strongly encouraged. Hand sanitization stations are located in most treatment rooms and hallways.

Stay at Home Measures

We encourage sick person(s) to stay home when experiencing symptoms. As noted above, certain symptoms require a person to be symptom-free for 72 hours prior to returning to the building.

Absence policies remain in place per the company handbook. Time off policies accrued may be used to replace hours lost due to illness. We are aware that there may be an increased need to care for sick person(s) in your home. Please contact (734) 772-5354 when you or a member of your household is ill preventing your ability to report to the office.

Respiratory Etiquette

Employees are requested to use strong respiratory etiquette. In addition, we must all encourage and teach those receiving our services to engage in strong respiratory etiquette. Respiratory etiquette means covering coughs and sneezes. This can be done by:

- Coughing and sneezing into tissues or paper towels, then disposing of them immediately into our hands-free trash receptacles
- After coughing into a tissue or paper towel sanitizing the hands. The preferred method is by hand washing but sanitization with a sanitizer found around the building is also an option. Single-use gloves should be disposed of, the hands then sanitized in one of the previously mentioned methods, then putting on new gloves.
- Coughing and sneezing into the elbow.
- Tissues and hands-free trash receptacles are placed throughout the building. Please dispose of tissues and dirty gloves (using universal precautions to remove) in the nearest receptacle.

Regular Housekeeping Practices

Our building and all materials contained therein were thoroughly sanitized using cleaning chemicals known to kill viruses and bacteria during the week of 4/20/20 – 4/26/20. EPA-approved disinfectant labels were consulted during selection. Gloves and face masks were provided and social distancing was put into place during this process. Manufacturer instructions were followed for all cleaning.

Once therapeutic & childcare operations resume, the office will undergo routine cleaning twice per week by our cleaning company. This is an increase from once per week cleaning prior to the Covid-19 outbreak.

In addition, the following procedures are set forth until further notice to ensure ongoing sanitization:

1. Employees will be given 15 minutes of closure time between therapists for the same client to sanitize all materials before transferring the therapy room to a new therapist.
2. Employees will be given 30 minutes of closure time at the end of their work day to thoroughly clean all therapy rooms, materials and a designated area of the center. Job checklists will be used and the administrative employee on site at the time of office closure will be responsible for checking that all duties were completed on a checklist.
3. For in home materials, the employee will be given 15 minutes after every session has ended to sanitize the therapy materials.

Scheduling cell phone: Prior to the change of hands the device must be cleaned using disinfectant wipes found throughout the building. The process is as follows:

1. Sanitize your gloved hands.
2. Obtain a disinfecting wipe.
3. Thoroughly sanitize the device.
4. Dispose of the wipes in one of in our hands-free trash receptacles.
5. If you are wearing single-use gloves, please throw them away in one of our hands free trash receptacles. Please obtain and put on a new pair of single-use gloves. Please ensure that you are using universal precautions throughout the process
6. If you are wearing multi-use gloves, please immediately sanitize the gloves via hand-washing or hand sanitizer.

Laptops, tablets, administration cell phone, printer / copier system, office phone and all other surfaces or items: Prior to and after your use of these items, the item(s) must be cleaned using disinfectant wipes found throughout the building. The process is as follows:

1. Sanitize your gloved hands.
2. Obtain a disinfecting wipe.
3. Thoroughly sanitize the device.
4. Dispose of the wipes in one of in our hands-free trash receptacles.
5. If you are wearing single-use gloves, please throw them away in one of our hands free trash receptacles. Please obtain and put on a new pair of single-use gloves. Please ensure that you are using universal precautions throughout the process
6. If you are wearing multi-use gloves, please immediately sanitize the gloves via hand-washing or hand sanitizer.

Actions discouraged by the Business

We discourage touching of the face as much as possible. Where that hand to face contact occurs, we request the hands are immediately sanitized using hand washing procedures or sanitization using hand sanitizer.

Employees should not use the work materials of other employees (i.e., desks, offices, phones, computers, tablets, work tools, pens, etc). Where that is not possible, the item(s) must be sanitized using the following process:

1. Sanitize your gloved hands.
2. Obtain a disinfecting wipe.
3. Thoroughly sanitize the device.
4. Dispose of the wipes in one of in our hands-free trash receptacles.
5. If you are wearing single-use gloves, please throw them away in one of our hands free trash receptacles. Please obtain and put on a new pair of single-use gloves. Please ensure that you are using universal precautions throughout the process
6. If you are wearing multi-use gloves, please immediately sanitize the gloves via hand-washing or hand sanitizer.

General Duty Clause of the Act

Employers have a requirement to provide employees with a workplace free from recognized hazards likely to cause death or serious harm. Please note that employees should not eat except in designated areas during designated break times. Consumption of liquids is prohibited in bathrooms.

Personal Protective Equipment GI Part 33

Personal Protective Equipment is required by all employees as noted above.

Respiratory Protection GI Part 451

Respiratory protection (I.e., KN95 masks) are not provided or deemed necessary in part by our gubernatorial order in the state reserving those for life-sustaining professions.

However, we have provided face masks and a respiratory shield barrier that is to be placed inside of your face mask. This barrier, if you have not received it, will be provided prior to return of our normal operations when increased risk begins. They are scheduled to arrive between May 1 – May 6, 2020.

Bloodborne pathogens 29 CFR 1910.1030

All employees have been provided initial and recertification classes on CPR and first aid. Tele trainings have also been provided. Universal Precautions per that training are to be used at all times. While the risk of exposure is limited, Universal Precautions remain vital in protecting all of us. Should you need a refresher training, please contact Human Resources to be scheduled for a retraining class.