COVID-19 Preparedness and Safety Plan for GHO Inc. (Day Hab)

General Human Outreach in the Community, Inc. (hereinafter “Company”) takes the health and safety of our employees very seriously. The Company is committed to providing a safe and healthy workplace for all of our employees and visitors.

To ensure we have as safe and healthy workplace, we have developed the following COVID-19 Preparedness and Safety Plan in response to the COVID-19 pandemic. All employees are all responsible for implementing this plan. Our goal is to mitigate the potential for transmission of COVID-19 in our workplaces and communities, and that requires full cooperation among our employees, contractors and visitors. Only through this cooperative effort can we establish and maintain the safety and health of our employees and workplaces.

All employees are responsible for implementing and complying with all aspects of this COVID-19 Preparedness and Safety Plan. GHO’s managerial staff are expected to enforce the provisions of this policy. Our employees are our most important assets. We are serious about safety and health and keeping our employees working at GHO Inc.

Our COVID-19 Preparedness and Safety Plan follows related guidance from Centers for Disease Control and Prevention (CDC), Environmental Protection Agency (EPA), Occupational Safety and Health Administration (OSHA), New York State Department of Health (DOH) and Office for People with Developmental Disabilities (OPWDD) and is subject to change based on further information provided by them and other public officials. The Company may also amend this Plan based on operational needs.

I. Responsibilities of Managerial Staff and Supervisors

All managerial staff must be familiar with this Plan and be ready to answer questions from employees. Supervisors must set a good example by following this Plan at all times. This involves practicing good personal hygiene and workplace safety practices to prevent the spread of the virus. Supervisors must encourage this same behavior from all employees.

II. Responsibilities of Employees

The Company is asking every one of our employees to help with our prevention efforts while at work. In order to minimize the spread of COVID-19 at our workplaces, everyone must play their part. As set forth below, the Company has instituted various housekeeping, social distancing, and other best practices at our jobsites. All employees must follow these. In addition, employees are expected to report to their supervisors if they are experiencing signs or symptoms of COVID-19, as described below.

If you have a specific question about this Plan or COVID-19, please ask your supervisor. If they cannot answer the question, please contact Robert Tong, Deputy Director or Judy Popso, Corporate Compliance Officer.

OSHA and the CDC have provided the following control and preventative guidance for all workers, regardless of exposure risk:
• Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand sanitizer with at least 60% alcohol.

• Avoid touching your eyes, nose, or mouth with unwashed hands

• Follow appropriate respiratory etiquette, which includes covering for coughs and avoid close contact with people who are sick. In addition, employees must familiarize themselves with the symptoms of COVID-19, which include the following:

  ✓ Coughing;
  ✓ Shortness of breath, difficulty breathing; and
  ✓ Fever
  ✓ Early symptoms such as chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose. If you develop a fever and symptoms of respiratory illness, such as cough or shortness of breath, DO NOT GO TO WORK and call your supervisor and healthcare provider right away. Likewise, if you come into close contact with someone showing these symptoms, call your supervisor and healthcare provider right away.

III. Work Site Protective Measures

The Company has instituted the following protective measures at all worksites.

A. General Safety Policies and Rules

Basic infection prevention measures are being implemented at our workplaces at all times.

I. A. Screening/Entrance to Day Program

1. Any employee/contractor/visitor/individual will be asked to have their temperatures measured by a non-contact thermometer before entering the work place. Anyone who has a temperature of 100 degrees F or more or showing symptoms of COVID-19 will be asked to leave the worksite and return home.

2. Employees and individuals are to self-report, to the extent they are able, any changes in symptom status throughout the day and will inform the management team if he or she and/or individuals experience COVID-19 related symptoms.

3. If any individuals display elevated temperatures, the nurse must be contacted and further instructions will be given. Individuals who have cold like symptoms will be asked to stay home.

4. A designated management staff or employee wearing proper PPE equipment will verify and record the temperature on the Questionnaire form. Screening or monitoring results and illness information will be kept confidential at all times.
5. A separate log will be used to record the temperatures of the individuals.

6. A mandatory health screening questionnaire will be given to employees, visiting employees, contractors and visitors before they are allowed into the Day Program. The questionnaire will ask about (1) COVID-19 symptoms in the past 14 days (2) positive COVID-19 test in past 14 days and (3) close contact with confirmed or suspected Covid-19 person in past 14 days and (4) travel from within one of the designated states with significant community spread. The temperature and responses will be reviewed before the person is allowed onto the workplace. Any employee, contractor or visitor who refuses to answer the questionnaire will not be allowed to enter the workplace.

7. A sign-in log will be used to record any guests/visitors who entered the workplace on a daily basis. All guests/visitors will be required to sign in. Non-essential visitors are not allowed.

8. Entrance into the Day Program sites will be restricted to essential employees responsible for the direct provision of service not amenable to delivery via telehealth alternatives or those persons required to ensure continued health and safety operations (e.g. PPE supply delivery or work control etc.).

B. General Information

1. Employees are instructed to wash their hands for at least 20 seconds with soap and water frequently throughout the day, but especially at the beginning and end of their shift, prior to any mealtimes and after using the toilet. All individuals will be asked to wash their hands upon arrival to the Day Program.

2. All visitors will be encouraged to wash or sanitize their hands prior to or immediately upon entering the Day Program. Hand-sanitizer dispensers (that use sanitizers of greater than 60% alcohol) will be made available at entrances and locations in the workplace so they can be used for hand hygiene in place of soap and water.

3. Management will ensure that guests, employees, contractors and individuals abide by the social distancing guidelines whereby everyone is at least 6 feet apart at all times when possible while in the Day Program. Certain exceptions may apply when working with individuals. Hand shaking is discouraged and is not recommended.

4. The Day program may consider modifying employee schedules (if necessary) to reduce the number of employees in the workplace.

5. The staffing schedule will not require employees to float between different rooms or groups of individuals unless it is due to unforeseen circumstances like unexpected employee absences.

6. Management will rearrange the spacing of the tables and chairs in the classrooms and offices so that employees and individuals are at least 6 feet apart in any direction at all times.

II. Lunch

Lunch breaks will be staggered in order to reduce the number of employees and individuals in one area at the same time. Employees must maintain at least 6 feet in any direction at all times from others while eating.
The size of any group gathering for individuals at any one time for lunch should be limited to less than 4 individuals. (This may vary depending on the size of the dining table and dining area) Seating areas arrangements will be modified (e.g. chairs, tables) to ensure that individuals are at least six feet apart in all directions (e.g. side-to-side and when facing one another).

Shared food and beverages will be prohibited at all times.

Foods that are brought from home will require limited preparation (i.e. heating in microwave) during day services and be packed appropriately.

Reusable food utensils and storage containers will be washed in the hottest water possible.

III. Meetings

1. All in-person meetings will be limited. To the extent possible, meetings will be conducted by telephone or by video conferences. All meetings should be held in open, well-ventilated spaces with appropriate social distancing among employees and other participants. Attendance will not be tracked through passed-around sign-in sheets. One designated person will sign-in each attendee. During any in-person meetings, there will be no gathering in groups of more than 10 people and participants must remain at least six (6) feet apart.

IV. Social Distancing

1. The Day program will consider reducing the total number of individuals served at one time, in order to reduce congestion and facilitate easier social distancing. The Day Program may consider staggering Day program hours in order to accommodate more individuals in the future.

2. Employees will be restricted from gathering in common areas such as hallways, entry ways, lobby, kitchen, class rooms and offices, etc.

3. The use of common areas, such as the reception area and other public spaces will follow social distancing guidelines at all times. There should be six feet of separation when seated in the classrooms and any other meeting venues at all times.

   Individuals will be educated to follow social distancing guidelines and should also follow six feet of separation when seated in the dining area, classrooms and any other places at all times, unless safety of the core activity requires a shorter distance or an individual’s treatment plan requires that closer contact be maintained with an employee.

4. During recreational and community outings, Day Hab employees will abide by the guideline of social distancing by wearing face masks at all times and keeping a distance of 6 feet. (certain exceptions may apply when working with individuals). Hand sanitizers will be provided to staff to provide to the individuals when going on public outings, to sanitize their hands after touching the handrails and other surfaces.

   Individuals will also abide by the guidelines of 6 feet as listed above during recreational and community outings, unless safety of the core activity requires a shorter distance or an individual’s treatment plan requires that closer contact be maintained with an employee. Facemasks will be encouraged at all times.
5. Management at the Day program will ensure that different stable groups individuals and staff, have no or minimal contact with one another and do not utilize common spaces at the same time, to the greatest extent possible.

6. Day Program will allow high risk individuals, who prefer to remain at home, to participate in less intensive in-home supports of a shorter duration and encourage continued use of tele-health to supplement service delivery.

7. Day program will focus on activities with little or no physical contact and which do not rely on shared equipment, to the extent possible. Individual’s activities will be scheduled to reduce density and allow for social distancing.

8. Signage reminding employees and third parties of need to maintain social distancing will be posted throughout the workplace.

9. Signage stating that non-essential visitors are not allowed will be posted in the building entrances. Signage regarding instruction on the critical COVID-19 transmission prevention and containment will be posted throughout the workplace. Signage regarding proper disposal of PPE will be posted next to the trash container specific to disposal of used PPEs.

10. The use of signage and/or floor markers denoting spaces of six feet will be used throughout program areas in which lines are commonly formed or people may congregate (e.g. entrance/exit into the facility, common spaces, hallways, meal areas, etc.).

11. The Company may consider and explore installing protective physical barriers such as partitions, sneeze guards or plexi-glass partitions on desks/tables in the classrooms/offices to protect employees against airborne droplets of the virus.

B. Job Site Visitors

1. The number of visitors to the Day program will be limited to only those necessary. Non-essential guests/contractors/visitors will be restricted and not allowed.

2. All visitors will be screened in advance of arriving to the Day Program. A non-contact thermometer will be used to check temperature. Anyone who has a temperature of 100 degrees F or more or showing symptoms of COVID-19 will be asked to leave and seek medical advice from their doctor. The visitor will be required to complete a screening questionnaire. Those who refuse to fill out the questionnaire will not be allowed onto the workplace. If the visitor answers “yes” to any of the following questions, he/she should not be permitted to access the worksite:

- Have you been confirmed positive for COVID-19?
- Are you currently experiencing, or recently experienced, any acute respiratory illness symptoms such as fever, cough, or shortness of breath?
- Have you been in close contact with any persons who has been confirmed positive for COVID-19?
- Have you been in close contact with any persons who have traveled and are also exhibiting acute respiratory illness symptoms?
✓ Have you traveled to a country for which the CDC has issued a Level 2 or 3 travel designation within the last 14 days?
✓ Have you traveled from within one of the designated states with significant community spread?

3. Site deliveries will be permitted but should be properly coordinated in line with the Company’s minimal contact protocol.

4. Visitors are expected and required to wear PPEs and follow all social distancing and hand washing protocols at all times while on the premises. Facemasks and gloves will be provided to those visitors who do not have any. Those who do not cooperate will be asked to leave.

5. All visitors will need to sign the Visitors log. Log should contain contact information, such that all contacts may be identified, traced and notified in the event someone is diagnosed with COVID-19.

C. Personal Protective Equipment

1. The Company will provide at no cost:
   - Gloves: Employees in the Day program should wear gloves while on-site.
   - Gloves will be made available at all times to employees at the workplace. Gloves should be worn when cleaning and disinfecting surfaces, removing garbage bags, disposing of trash etc. Employees should avoid sharing gloves and follow proper protocol in removing dirty/soiled gloves. Discarded gloves should be disposed of properly at designated trash containers lined with a bag that can be tied closed before disposing with other waste.
   - Eye protection: Eye protection can be worn by the employee if he or she chooses. Safety glasses will not be provided by the Company.
   - Face masks/shields: Face masks should be worn at all times while on-site. Employees must wear face masks when going out on group outings (recreational). Employees will be allowed to use their own face masks or face coverings. Personal face masks worn by employees should be business appropriate.
   - All employees must wear an appropriate cloth or disposable face mask/covering that covers both the mouth and nose, at all times while providing services, consistent with all current Executive Orders and OPWDD guidelines (unless medically contraindicated / not tolerated).
   - Disposable face masks and face shields will be made available to all employees and guests/visitors.
   - Gowns: Protective gowns may be worn by employees while on-site. This is optional. Discarded gowns should be disposed of properly at designated trash container lined with a bag that can be tied closed before disposing of them with other waste.
Employees will be trained on proper use of PPE including when necessary to use, donning, doffing, disposing and/or reusing and sanitizing when appropriate. Documentation of trainings will be retained in the employees’ personnel files and per agency procedures.

Employees must ensure that a distance of at least six feet is maintained among individuals at all times, unless safety of the core activity requires a shorter distance or an individual’s treatment plan requires that closer contact be maintained with an employee. Any time employees must come within six feet of another person/individual, acceptable face coverings must be worn at all times.

*Individuals will be encouraged to bring and wear a face mask, as tolerated, in the Day Program and also during outings (recreational and community) and while being transported to and from the program. They will be encouraged to wash hands frequently with soap and water for at least 20 seconds using techniques per NYS DOH and CDC guidance.*

D. Work Site Cleaning and Disinfecting

I. Routine Cleaning

1. The Company has instituted regular housekeeping practices, which include cleaning and disinfecting frequently used equipment, and other elements of the work environment, where possible. Employees should regularly do the same in their assigned work areas/classrooms and as part of their job duties, employees are expected to cooperate and contribute in the cleaning and disinfecting of high touch areas and public spaces throughout their shifts.

2. Frequent cleaning and disinfecting will be conducted throughout the day in high-touch areas, such as tabletops, bathroom fixtures, toilets, tablets, phones, keyboards, touch screens, light switches, door handles, copy machines, fax machines and time clock etc.

3. Personal protective equipment, phones, pens, computer equipment, desks, workstations, offices or other personal work tools and equipment will not be shared and, if used by more than one person, cleaned and disinfected between users.

4. The classroom/kitchen areas at the Day Program will be cleaned and disinfected at least once per day. Employees performing cleaning should wear proper personal protective equipment (“PPE”), such as latex, or vinyl gloves, gowns (if available), as recommended by the CDC.

5. Appropriate and effective cleaning and disinfectant supplies such as bleach, Lysol and Pine Sol will be made available. Disinfectant will be EPA and DEC* registered products specifically labeled for SARS-CoV-2. In the event that they are not available, disinfectant labeled to be effective against rhinovirus and/or human coronavirus will be used. Once the EPA and DEC* registered disinfectants specifically labeled as effective against SARS-CoV-2 become available, those products should be used for targeted disinfection of frequently touched surfaces. Adequate supplies to support healthy hygiene behaviors, including soap, hand sanitizer with at least 60 percent alcohol, tissues, paper towels will be available.
6. Day Program staff will be responsible for cleaning and disinfecting the floors using appropriate cleaning products and disinfectants and following the label directions at the end of the day (3 pm) after all individuals have left the site. Kitchen surfaces, counter tops, tabletops, appliances and dining tables and chairs will be cleaned and disinfected after each use. Bathrooms will be thoroughly cleaned. Door Handles, light switches and other high touch areas will be cleaned and disinfected more frequently throughout the day and also at the end of the day (3 pm).

The Company may consider hiring a cleaning company/ janitor to assist in the cleaning and disinfecting of the Day program at least two times per week.

7. Cleaning and disinfecting of common and high use areas (i.e., kitchen, bathrooms) will occur throughout the day during program hours.

8. Cleaning products, sanitizers and disinfectants will be kept secure and out of reach of individuals who may misuse (i.e. consume, dump out etc.). Products will be locked in a separate supply closet or cabinet, with only staff having key access. After sanitizing or disinfecting any gloves, paper towels or other disposable items used will be immediately discarded. These will be tied in a trash bag and removed from the environment to prevent individuals from accessing potentially contaminated or hazardous materials.

9. A cleaning log will be implemented and staff will be responsible for initialing that the cleaning was completed indicating the date, time, and scope of cleaning.

10. Management at the Day Program will ensure that all areas are well ventilated and ensure regular cleaning and changing of filters in the air conditioning or ventilation systems.

11. Management will consider increasing circulation of outdoor air as much as possible by opening windows and doors, using fans, and other methods as long as the open windows and doors do not pose a safety or health risk for the individuals.

12. Management will limit use of shared objects/equipment. Shared items will be cleaned and/or sanitized after each use. Hand hygiene before/after contact and glove use will be required.

13. The use of items/objects that cannot be cleaned and sanitized (i.e. soft object, cloth placemats, etc.) will be prohibited unless clinically required.

14. Bringing personal items from home will be prohibited, except when clinically necessary. A plan will be in place for regular cleaning and disinfection including immediately prior to departure.

II. Cleaning After Employee/Individual tested positive

The Company will clean and disinfect those areas of the worksite (i.e., offices, classrooms, bathrooms, common areas and shared equipment) that a confirmed-positive employee/individual may have contacted and it will do so before employees can access that work space again. The Company will wait 24 hours or longer before cleaning. The Company will ensure that any disinfection shall be conducted using one of the following:
✓ Common EPA-registered household disinfectant labeled to be effective against human coronavirus like Barbicide;

✓ Alcohol solution with at least 70% alcohol; or diluted household bleach solutions (if appropriate for the surface).

E. Transportation

The day program will work with our transportation company to ensure that the following measures are in place in order to transport individuals to/from day programming:

• Only individuals from the same facility should be transported together; individuals from other residences should not be intermingled for purposes of transportation at this time.

• Capacity on buses, vans, and other vehicles should be reduced to 50% of total capacity to maximize social distancing and reduce COVID-19 transmission risks.

  Individuals and staff who reside/work together in the same home may be transported together to day program(s) in the same vehicle without a vehicle capacity reduction.

• To the extent possible, individuals and staff from different households should restrict close contact by not sitting near each other or the driver. Individuals should be directed to not exit the vehicle at once, instead following driver or staff instruction on exiting one person at a time.

• To the extent they can medically tolerate one, individuals, staff, and the driver must wear face coverings at all times in the vehicle. Social distancing must be maintained for individuals who cannot tolerate wearing a mask and, when possible, such individuals should be transported alone or with members of the same household. Employee who cannot medically tolerate the use of a face covering should not be assigned to transport individuals at this time.

• After each trip is completed, the interior of the vehicle should be thoroughly cleaned before additional individuals are transported; and where appropriate and safe, windows should be rolled down to permit air flow.

F. Tracing and Tracking

• The local health department and OPWDD will be notified immediately upon being informed of any positive COVID-19 test result by an individual or employee at the site.

• If an employee or visitor test positive, the day program will cooperate with the local health department to trace all contacts in the workplace and notify the health department of all employees, individuals and visitors who entered the facility dating back to 48 hours before the positive person began experiencing COVID-19 symptoms or tested positive, whichever is earlier, maintaining confidentiality as required by federal and state law and regulations.

• Employee who are alerted that they have come into close or proximate contact with a person with COVID-19, and have been alerted via tracing, tracking or other mechanism, will be required to self-report at the time of alert and shall follow all required protocols as if they had been exposed at work.
IV. Workplace Safety

** ALL EMPLOYEES WILL BE REMINDED TO STAY HOME IF HE/SHE IS SICK. **

Employee Exhibits COVID-19 Symptoms

- If an employee exhibits COVID-19 symptoms, the employee must stay at home until he or she is symptom free for 72 hours (3 full days) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants).

- Employees who become sick during the day should immediately be separated from others and sent home with instructions and guidance to follow-up with their health care professional. The employee must stay at home and he or she must be symptom free for 72 hours (3 full days) without the use of fever reducing medications, and must have other symptoms improving. To the extent practical, employees are required to obtain a doctor’s note clearing them to return to work.

- The Day Program will immediately notify the local health Department and OPWDD about the suspected case.

  *Individuals who are sent home will be instructed to contact their healthcare provider for assessment and testing. The Day Program will immediately notify the local health Dept. and OPWDD about the suspected case.*

Employee Tests Positive for COVID-19

- Employees who test positive for COVID-19 or is asymptomatic but tested and found to be positive will be directed to a 14-day self-quarantine away from work. Employees that test positive and are symptom free may return to work when at least fourteen (14) days have passed since the date of his or her first positive test, and have not had a subsequent illness. They must also have been at least 72 hours fever-free without fever reducing medications and with other symptoms improving.

- Employees who test positive and have been hospitalized may return to work when directed to do so by their medical care providers.

- Employees who are severely immune-compromised as a result of medical conditions or medications should consult with a healthcare provider before returning to work.

- The Company will require an employee to provide documentation clearing his or her return to work. The Company reserves the right to ask the employee to provide proof of a negative test before allowing the employee to return.

Employee Has Close Contact with Someone Who Has Tested Positive for COVID-19

- Employees who have come into close contact with someone who has tested positive for COVID-19 (co-worker or otherwise) will be directed to self-quarantine for 14 days from the last date of close contact with the positive person. Close contact is defined as six (6) feet for a prolonged period of time.
• If the Company learns that an employee has tested positive, the Company will conduct an investigation to determine co-workers who may have had close contact with the confirmed positive employee in the prior 14 days and direct those who have had close contact with the confirmed-positive employee to self-quarantine for 14 days from the last date of close contact with that employee.

• If applicable, the Company will also notify any sub-contractors, vendors/suppliers or visitors who may have had close contact with the confirmed-positive employee.

• If an employee learns that he or she has tested positive for COVID-19 or has come into close contact with a confirmed-positive person outside of the workplace, he/she must alert a supervisor immediately. The agency will assess the situation and notify all co-workers and individuals who had close contact with that employee and also report the incident to the Justice Center.

• The Company will clean those areas of the worksite that a confirmed-positive person may have contacted and it will do so before other employees can access that work space again.

Employee Return to Work Protocol

The Company may allow Day Hab or other facility staff who has been exposed to a confirmed case of COVID-19, or who have traveled internationally or from one of the designated states in the past 14 days to return to work if all of the following conditions are met:

• Furloughing such employee would result in staff shortages that would adversely impact operation of the company.

• An employee who has been in contact with confirmed or suspected cases is asymptomatic.

• Employee who is asymptomatic contacts of confirmed or suspected cases should self-monitor twice a day (i.e. temperature, symptoms), and undergo temperature monitoring and symptom checks at the beginning of their shift and during the middle of their shift.

• Employee who is asymptomatic contact of confirmed or suspected cases should wear a facemask while working at all times while on-site, until 14 days after the last high-risk exposure.

• To the extent possible, Day Hab staff and clinical staff working under these conditions should preferentially be assigned to individuals at lower risk for severe complications, as opposed to higher-risk individuals (e.g. severely immune-compromised, elderly).

• An employee allowed to return to work under these conditions should maintain self-quarantine when not at work.

• At any time, if the employee who is asymptomatic comes into contact with a positive case and working under these conditions develops symptoms consistent with COVID-19, he/she should immediately stop work and isolate at home. All staff with symptoms consistent with COVID-19 should be immediately referred for diagnostic testing for COVID-19.
Individuals may not return to or attend the Day Program while a member of their household or certified residence are being quarantined or isolated. In the event an individual or anyone they reside with are placed on quarantine or isolation, the responsible party or family member must notify the Day Program immediately and must suspend attending Day Program until they are medically cleared to return.

V. OSHA Recordkeeping

1. If a confirmed case of COVID-19 is reported, the Company will determine if it meets the criteria for recordability and reportability under OSHA’s recordkeeping rule. OSHA requires employers to record work-related injuries and illnesses that meet certain severity criteria on the OSHA 300 Log, as well as complete the OSHA Form 301 (or equivalent) upon the occurrence of these injuries.

2. For purposes of COVID-19, OSHA also requires employers to report to OSHA any work-related illness that (1) results in a fatality, or (2) results in the in-patient hospitalization of one or more employee. “In-patient” hospitalization is defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment.

3. OSHA has made a determination that COVID-19 should not be excluded from coverage of the rule – like the common cold or the seasonal flu – and, thus, OSHA is considering it an “illness.” However, OSHA has stated that only confirmed cases of COVID-19 should be considered an illness under the rule. Thus, if an employee simply comes to work with symptoms consistent with COVID-19 but is not a confirmed diagnosis, the recordability analysis is not necessarily triggered at that time.

4. If an employee has a confirmed case of COVID-19, the Company will conduct an assessment of any workplace exposures to determine if the case is work-related. Work-relatedness is presumed for illnesses that result from events or exposures in the work environment, unless it meets certain exceptions. One of those exceptions is that the illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside of the work environment. Thus, if an employee develops COVID-19 solely from an exposure outside of the work environment, it would not be work-related, and thus not recordable.

5. The Company’s assessment will consider the work environment itself, the type of work performed, the risk of person-to-person transmission given the work environment, and other factors such as community spread. Further, if an employee has a confirmed case of COVID-19 that is considered work-related, the Company will report the case to OSHA if it results in a fatality within 30 days or an in-patient hospitalization within 24-hours of the exposure incident.

6. If an employee is diagnosed with COVID-19, the Company will ensure that cleaning and disinfecting of that employee’s work station is performed 24 hours after notification.
VI. Confidentiality/Privacy

1. Except for circumstances in which the Company is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. When it is required, the number of persons who will be informed that an unnamed employee has tested positive will be kept to the minimum needed to comply with reporting requirements and to limit the potential for transmission to others.

2. The Company reserves the right to inform other employees that an unnamed co-worker has been diagnosed with COVID-19 if the other employees might have been exposed to the disease so the employees may take measures to protect their own health. The Company also reserves the right to inform sub-contractors, vendors/suppliers or visitors that an unnamed employee has been diagnosed with COVID-19 if they might have been exposed to the disease so those individuals may take measures to protect their own health.

VII. General Questions

Given the fast developing nature of the COVID-19 outbreak, the Company may modify this Plan on a case by case basis. If you have any questions concerning this Plan, please contact Robert Tong, Deputy Director or Judy Popso, Corporate Compliance Officer.

VIII. Final Note

It is expected that all employees follow the guidelines set forth in this Plan. The Company requires all employees’ cooperation in order to ensure that we maintain a safe and healthy environment. Every employee plays a role in making sure our workplaces are as safe as possible to remain open. Reducing exposure to yourself and others is a shared responsibility. All of us need to move forward together using recommended best practices and maintaining safe daily habits in order to reduce our risk of exposure to COVID-19. As such, those who do not cooperate and fail to follow this Plan will be subject to disciplinary action.
COVID-19 Summary for Employers and Employees

- All employees, contractors and visitors will be expected to follow the COVID-19 Preparedness and Safety Plan. Employees who fail to do so will result in disciplinary action and/or suspension from work.

- All employees, contractors and visitors will be pre-screened to ensure they are not exhibiting symptoms.

- Employees, contractors, and visitors will be asked to leave the worksite and return home if they are showing symptoms.

- Hand sanitizer, antibacterial wipes, gloves and face masks/shields will be made available to employees, individuals and visitors on site.

- Protective equipment (PPE) will be provided to any employee at no cost.

- Social distancing will be observed at all times, unless safety of the core activity requires a shorter distance or an individuals’ treatment plan requires that closer contact be maintained with an employee.

- Signage will be posted throughout the Day Hab Program reminding all of the hand washing protocol and other COVID-19 prevention information.

- Local health department and OPWDD will be immediately notified upon being informed of any positive Covid-19 test result by an individual or employee at the Day program site.

Employee Responsibilities

- Become familiar with the COVID-19 Preparedness and Safety Plan and follow all elements of the Plan.

- In the event the employee or anyone they reside with are placed on quarantine or isolation, the employees must notify the Day Program immediately and must stop reporting to work until they are medically cleared to return.

- Practice good hygiene: wash hands with soap and water for at least 20 seconds. If these are not available, use alcohol-based hand rub with at least 60% alcohol. Avoid touching your face, eyes, food, etc. with unwashed hands.

- Employees who have symptoms (i.e., fever, cough, or shortness of breath) should notify their supervisor and stay home—DO NOT GO TO WORK.

- Sick employees should follow CDC-recommended steps. Employees should not return to work until the criteria to discontinue home isolation are met, in consultation with healthcare providers and state and local health departments.

- Face mask/shield protection: Face mask protection should be worn by employees at all times while on-site. Face masks/shields will be provided by the Company at no cost.

- Gloves and masks should be worn at all times while on-site. The type of glove worn should be appropriate to the task. Gloves should not be shared if at all possible. Gloves will be provided by the Company at no cost.
• Cooperate and assist in cleaning and disinfecting of high touch areas such as tabletops, toilets, bathroom fixtures, door handles, light switches, keyboards, countertops etc.

• Employees should clean their assigned work areas before and after their shift.

Cleaning/Disinfecting Job Sites and Other Protective Measures

• Clean and disinfect frequently used equipment and tables on a regular basis. This includes other elements of the worksite where possible.

• Clean and disinfect classrooms, kitchen and other high traffic areas at least once per day.

• Disinfect shared surfaces (door handles, machinery controls, etc.) on a regular basis.

• Avoid using other employees’ phones, desks, offices, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.

• Clean and disinfect shared spaces such as hallways and bathrooms at least once per day.
What is COVID-19?

The novel coronavirus, COVID-19 is one of seven types of known human coronaviruses. COVID-19, like the MERS and SARS coronaviruses, likely evolved from a virus previously found in animals. The remaining known coronaviruses cause a significant percentage of colds in adults and children, and these are not a serious threat for otherwise healthy adults. Patients with confirmed COVID-19 infection have reportedly had mild to severe respiratory illness with symptoms such as fever, cough, and shortness of breath. According to the U.S. Department of Health and Human Services/Centers for Disease Control and Prevention ("CDC"), Chinese authorities identified an outbreak caused by a novel—or new—coronavirus. The virus can cause mild to severe respiratory illness. The outbreak began in Wuhan, Hubei Province, China, and has spread to a growing number of other countries—including the United States.

How is COVID-19 Spread?

COVID-19, like other viruses, can spread between people. Infected people can spread COVID-19 through their respiratory secretions, especially when they cough or sneeze. According to the CDC, spread from person-to-person is most likely among close contacts (about 6 feet). Person-to-person spread is thought to occur mainly via respiratory droplets produced when an infected person coughs or sneezes, like influenza and other respiratory pathogens. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs. It is currently unclear if a person can get COVID-19 by touching a surface or object that has the virus on it and then touching their own mouth, nose, or possibly their eyes. In assessing potential hazards, employers should consider whether their workers may encounter someone infected with COVID-19 in the course of their duties. Employers should also determine if workers could be exposed to environments (e.g., worksites) or materials (e.g., laboratory samples, waste) contaminated with the virus. Depending on the work setting, employers may also rely on identification of sick individuals who have signs, symptoms, and/or a history of travel to COVID-19-affected areas that indicate potential infection with the virus, in order to help identify exposure risks for workers and implement appropriate control measures. There is much more to learn about the transmissibility, severity, and other features associated with COVID-19, and investigations are ongoing.