<u>**THRESHOLDS**</u>

<u>**COVID-19 PREPAREDNESS AND RESPONSE PLAN**</u>

Thresholds ("Company") takes the health and safety of our employees seriously. With the spread of COVID-19 and the need for certain employees to continue in-person work, either because they are critical infrastructure workers or they are needed to conduct minimum basic operations for the Company, the Company is committed to reducing the risk of exposure to COVID-19 at the Company's workplace(s) and to providing a healthy and safe workplace for our employees.

This Plan is based on information and guidance from the CDC and OSHA at the time of its development, and is subject to change based on further information provided by the CDC, OSHA, and other public officials.

In addition, the Company has existing policies that comport with this Plan, including:

- Infection Control Protocol
- Standard Precautions

The Company may also amend this Plan based on operational needs.

The Company has identified the following potential sources to spread COVID-19 in the workplace:

- Persons-Served/Residents
- Co-workers
- Vendors/visitors
- The general public

Our employees fall into the following category/categories:

- Lower exposure risk (the work performed does not required direct contact with people known or suspected to be infected with COVID-19 or frequent close contact with the public). This includes Thresholds office/administrative staff.

- Medium exposure risk (the work performed requires frequent and/or close contact with people who may be infected with COVID-19 but who are not known COVID-19 patients, or contact with the general public in areas where there is ongoing community transmission). This includes Thresholds direct care and facilities staff.

- High exposure risk (healthcare delivery and support staff exposed to know or suspected COVID-19 patients; medical transport workers moving known or suspected COVID-19 patients in enclosed vehicles; mortuary workers involved in preparing the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death. This includes Thresholds direct care staff charged with caring for COVID-19 positive residents.

COVID-19 WORKPLACE COORDINATOR

The Company has designated the following individual as its COVID-19 Workplace Coordinator: Darcy Wilcox. The Coordinator is responsible for staying abreast of federal, state and local

guidance and incorporating those recommendations into the Company's workplace. The Coordinator is also responsible for reviewing human resources policies and practices to make sure that they are consistent with this Plan and existing federal, state and local requirements.

The Coordinator can be reached at the following:

Phone numbers:

Office: 616.466.5255
Cell: 616.634.3187

Email address: darcyw@threshnet.org

RESPONSIBILITIES OF SUPERVISORS AND MANAGERS

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

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 worksite(s), everyone must play their part. As set forth below, the Company has instituted various housekeeping, social distancing, and other best practices at our workplace(s) to minimize exposure to COVID-19 and prevent its spread in the workplace. All employees must follow these best practices at all times for them to be effective. Beyond these best practices, the Company requires employees to report immediately to their managers or supervisors if they are experiencing signs or symptoms of COVID-19, as described below. If employees have a specific question about this Plan or COVID-19, they should ask their manager or supervisor or contact the Workplace Coordinator.

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 rub 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 sneezes.
- Avoid close contact with people who are sick.
- Maintain appropriate social distance of six feet whenever possible.

In addition, employees must familiarize themselves with the symptoms and exposure risks of COVID-19. The primary symptoms of COVID-19 include the following:

- Dry cough;
- Fever (either feeling feverish or a temperature of 100.4 degrees or higher);
- Shortness of breath or difficulty breathing.

<u>**THRESHOLDS**</u>

<u>**COVID-19 PREPAREDNESS AND RESPONSE PLAN**</u>

Individuals with COVID-19 may also have early symptoms such as chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose.

If employees develop a fever and symptoms of respiratory illness, such as an atypical cough or shortness of breath, they must not report to work, notify their supervisor immediately, and consult their healthcare provider, unless directed by the Company for patient/resident care reasons. Likewise, if employees come into close contact with someone showing these symptoms, they must notify their supervisor immediately and consult their healthcare provider. The Company also will work to identify any employees who have close contact with individuals with COVID-19 symptoms.

"Close contact" is not brief or incidental contact with a person with COVID-19 symptoms. Instead, the CDC defines "close contact" as either:

- Being within approximately six feet of a COVID-19 infected person or a person with any COVID-19 symptom(s) for a "prolonged period of time;" or
- Having direct contact with infectious secretions of a COVID-19 infected person or a person with any COVID-19 symptom(s) (e.g., being coughed on).

There is no precise definition of "prolonged period of time." CDC estimates range from 10 to 30 minutes. To protect employees, the Company uses the lower end of this range and considers a prolonged period to be 10 to 15 minutes of exposure.

WORKSITE PREVENTATIVE MEASURES

Minimizing exposure from co-workers. The Company will take the following steps to minimize exposure from co-workers to COVID-19 whenever possible while continuing to care for patients/residents ("patients") during the COVID-19 pandemic:

- Educate employees on protective behaviors that reduce the spread of COVID-19 and provide employees with the necessary tools for these protective behaviors, including:
    o Training on Infection Control Procedures and Standard Precautions at hire, annually and as needed.
    o Posting CDC information, including recommendations on risk factors at home and in the community.
    o Providing tissues and no-touch disposal receptacles to minimize exposure to infectious secretions.
    o Inform employees of the importance of good hand hygiene. Regularly washing hands with soap and water for at least 20 seconds is one of the most effective ways for employees to minimize exposure to COVID-19. If soap and water are not readily available, employees should use alcohol-based hand sanitizer that is at least 60% alcohol. If hands are visibly dirty, soap and water should be chosen over hand sanitizer.
    o Encourage good hand hygiene by ensuring that adequate supplies of soap and hand sanitizer are maintained and placing hand sanitizers in multiple locations.
    o Discourage handshaking and instead encourage the use of other noncontact methods of greeting

COVID-19 PREPAREDNESS AND RESPONSE PLAN

- o Avoid other employees' phones, desks, offices, other work tools and equipment, and other commonly touched surfaces when possible. If necessary, clean and disinfect them before and after use
- o Avoid sharing food utensils and food with other employees.
- o Encourage and require social distancing to the greatest extent possible while in the workplace.
- o Encourage employees to minimize ride-sharing. While in vehicles, employees must ensure adequate ventilation.
- o Provide masks, gloves and other PPE for medium and high risk employees, per CDC guidelines.

- Develop protocol for social distancing practices
  - o Evaluate areas in which employees work within 6 feet of each other and determine options to increase distance apart where possible.
  - o Limit in-person meetings to the extent possible
  - o Restrict the number of workers present on-site to no more than necessary to ensure safe operations
  - o Consider staggered shifts, break times, etc.
  - o Consider new shifts and starting times
  - o Promote remote work as much as possible in appropriate positions

- Unless patient care requirements prohibit, restrict employees from the workplace if they display symptoms of COVID-19
  - o Consider temporarily implementing health assessments and/or questionnaires prior to entry to workplace
  - o Immediately separate any employee with symptoms from other individuals and send him/her home

- Unless patient care requirements prohibit, actively encourage sick employees to stay home
  - o Apply available paid time off options and flexible attendance requirements
  - o Follow state and federal guidance for return to work
  - o Implement protocol for return to work after symptoms of COVID-19

- Unless patient care requirements prohibit, actively encourage employees to stay home if they have been in close contact with a confirmed or suspected case of COVID-19
  - o Apply available paid time off options and flexible attendance requirements
  - o Follow state and federal guidance for return to work
  - o Implement protocol for return to work after potential exposure to COVID-19

- Develop protocol to follow if an employee has a confirmed case of COVID-19
  - o Follow local Health Department and MDHHS Guidelines
  - o Communication plan with co-workers
  - o Work with local health department
  - o Evaluate OSHA reporting/recordkeeping requirements
  - o Implement protocol for return to work, including workplace contact tracing and CDC-recommended cleaning and disinfecting in all affected areas

COVID-19 PREPAREDNESS AND RESPONSE PLAN

- Perform increased routine environmental cleaning and disinfection
    - Ensure employees follow the Infection Control Policy
    - Instruct employees sanitize the work areas upon arrival, throughout the workday, and immediately before departure
    - Routinely clean and disinfect all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, and doorknobs.
    - Provide disposable wipes so that commonly used surfaces (for example, doorknobs, keyboards, remote controls, desks, other work tools and equipment) can be wiped down by employees before each use.
    - Maintain Safety Data Sheets of all disinfectants used on site

- Eliminate/restrict work-related travel if possible and limit employees' exposure to employee who traveled until the Company can confirm traveling employee does not have COVID-19 symptoms

- Plan to monitor and respond to absenteeism
    - Implement plans to continue essential business functions in case the Company experiences higher than usual absenteeism.
    - Cross-train employees to perform essential functions so the workplace can operate even if key employees are absent.

- Remind employees about the Company's employee assistance program (EAP) resources and community resources as needed.

- Talk with companies that provide contract or temporary employees about the importance of sick employees staying home and encourage them to develop non-punitive leave policies.

Additional Steps Required for Healthcare Providers and Healthcare Operations

Following are OSHA guidelines for all healthcare providers. Thresholds will adhere to all applicable Executive Orders and MDHHS Guidelines, as well as Federal, State and local directives.

Additional Precautions

- When possible, isolate patients suspected of having COVID-19 separately from those with confirmed cases of the virus to prevent further transmission—using either permanent (e.g., wall/different room) or temporary barrier (e.g., plastic sheeting). This is particularly important in any areas where medical screening, triage, or healthcare activities occur.
- Restrict the number of personnel entering isolation areas.
- Protect workers in close contact with (i.e., within 6 feet of) a COVID-19 infected person (confirmed or suspected) for a prolonged period, who have exposure to such persons' respiratory excretions, or who have prolonged/repeated contact with such persons by using additional engineering and administrative controls, safe work practices, and PPE, as set forth below.

THRESHOLDS

COVID-19 PREPAREDNESS AND RESPONSE PLAN

Engineering Controls
- Install physical barriers, such as clear plastic sneeze guards, where feasible and appropriate.
- Install and maintain appropriate air-handling systems in healthcare facilities.
- Whenever possible, use isolation rooms when available for performing aerosol-generating procedures on patients with known or suspected COVID-19.
- For postmortem activities, use autopsy suites or other similar isolation facilities when performing aerosol-generating procedures on the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death. See the CDC postmortem guidance at: www.cdc.gov/coronavirus/2019- ncov/hcp/guidance-postmortem-specimens.html. OSHA also provides guidance for postmortem activities on its COVID-19 webpage: www.osha.gov/covid-19.
- Use special precautions associated with Biosafety Level 3 when handling specimens from known or suspected COVID-19 patients. For more information about biosafety levels, consult the U.S. Department of Health and Human Services (HHS) "Biosafety in Microbiological and Biomedical Laboratories" at www.cdc.gov/biosafety/publications/bmbl5
- If possible, utilize specialized negative pressure ventilation in appropriate settings with significantly elevated risk of exposure, such as for aerosol generating procedures (e.g., airborne infection isolation rooms in healthcare settings and specialized autopsy suites in mortuary settings).

Administrative Controls
- Consider strategies to minimize face-to-face contact (e.g., drive through windows if feasible, remote-based communication when appropriate with co-workers, patients and families of patients).
- Require social distancing for staff and patients to the extent feasible.
- Provide face masks to ill employees and patients to contain respiratory secretions until they are able leave the workplace (i.e., for medical evaluation/care or to return home).
- Develop and implement policies that reduce exposure, such as grouping COVID-19 patients when single rooms are not available.
- Post signs requesting patients and family members to immediately report symptoms of respiratory illness on arrival at the healthcare facility and use disposable face masks.
- Consider offering enhanced medical monitoring of workers during COVID-19 outbreaks.
- Provide all workers with job-specific education and training on preventing transmission of COVID-19, including initial and routine/refresher training.
- Ensure that psychological and behavioral support is available to address employee stress.

Safe Work Practices
- If possible limit, the number of visitors to the worksite and encourage remote treatment and communications when appropriate.
- Develop protocol for health screening/questionnaire for visitors/vendors
- If needed, identify alternate supply chains for critical goods and services. Some good and services may be in higher demand or unavailable.
- Provide emergency responders and other essential personnel who may be exposed while working away from fixed facilities with alcohol-based hand rubs containing at least 60% alcohol for decontamination in the field.

THRESHOLDS

COVID-19 PREPAREDNESS AND RESPONSE PLAN

Personal Protective Equipment (PPE)
- PPE usage will vary depending on the job of the employee. All types of PPE must be:
  - Selected based upon the hazard to the worker.
  - Properly fitted and periodically refitted, as applicable (e.g., respirators).
  - Consistently and properly worn when required.
  - Regularly inspected, maintained, and replaced, as necessary.
  - Properly removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, others, or the environment.
- Workers with medium exposure risk may need to wear some combination of gloves, a gown, a face mask, and/or a face shield or goggles. Workers who dispose of PPE and other infectious waste will also be trained and provided with appropriate PPE.
- Most workers at high or very high exposure risk likely need to wear gloves, a gown, a face shield or goggles, and either a face mask or a respirator, depending on their job tasks and exposure risks.
- Those high and very high exposure risk workers that work closely with (either in contact with or within 6 feet of) patients known to be, or suspected of being, infected with SARS-CoV-2, the virus that causes COVID-19, should wear respirators.
- Workers, including those who work within 6 feet of patients known to be, or suspected of being, infected with SARS-CoV-2 and those performing aerosol-generating procedures, must use respirators.
- If employees have questions about PPE or how to use PPE properly, they should ask their supervisor.

4/22/2020