

COVID-19 Risk Mitigation Policy Updated: January 12, 2023

Purpose

Hope Community Resources, Inc (Hope) is committed to providing a safe and healthy workplace and environment for our employees and the recipients who choose our services. Hope has developed the following COVID-19 mitigation plan, which includes policies and procedures to minimize the risk of transmission of COVID-19, in accordance with guidance from sources including the Center for Disease Control & Prevention (CDC), Occupational Safety & Health Administration (OSHA), Department of Health and Social Services (DHSS), and State of Alaska Licensing; under the consultation and direction of Hope's Medical Director. This policy is subject to change based on further information, such as changing risk and spread within Hope's population and in our communities, as well as operational needs. Each circumstance and environment at Hope is different and may warrant stricter or different safeguards than what is outlined in policy, which may be directed by the Hope Healthline under the Medical Director's authority.

Responsibilities of Employees

Hope expects every employee to help with prevention efforts while at work. Employees are required to follow the guidelines outlined in this policy. Hope expects that employees will consider how their actions, while on and off the clock, can negatively or positively impact their co-workers and the vulnerable people we serve. We expect that employees show one another respect and consideration in all aspects of their work in alignment with Hope's Beliefs, Values, Mission, Vision, and Expectations.

Employees who choose to disregard Hope's expectations as outlined in this Policy will be subject to disciplinary action, up to and including separation of employment.

Responsibilities of Managers and Supervisors

All managers and supervisors should be familiar with this Policy and be ready to answer questions from employees. Managers and supervisors must set a good example for employees by always following this Policy.

Managers and supervisors are responsible to teach and redirect employees who do not follow policy as outlined. This may include progressive disciplinary actions to ensure policy compliance.

Ready for Work – Safety Practices for All Employees

All employees must commit to the following safe practices to minimize the spread of COVID-19 or other

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communicable diseases in the workplace:

- 1. Assess their health status by checking for any symptoms of illness before reporting to work.
 - a. If an employee has any symptoms of illness, the employee is responsible to immediately notify their supervisor and should not report to the workplace. The employee should test for COVID-19 with a rapid or PCR test 72 hours after symptoms begin. If an employee tests too early, they should be advised to test again at 72 hours after symptom onset and then can be considered for clearance. The employee can return to a working status with a negative test result, improving symptoms, and clearance from their supervisor.
 - b. In the case of an employee's chronic illness or condition that results in symptoms like known COVID-19 symptoms, an employee may obtain documentation of the condition from a medical provider, which must be submitted to the Human Resources department for placement in the employee's medical file. For symptoms consistent with a chronic illness or condition, the employee may report to work with symptoms if they feel well enough to work and receive clearance from their supervisor.
- 2. Frequently wash 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. Follow universal precautions as trained to annually in Bloodborne Pathogens training.
- 3. Employees are encouraged to wear a face mask while working. Masks are required to be worn in the following circumstances:
 - a. When providing close personal care services if either participant (employee or support recipient) is symptomatic of any type of illness.
 - b. At the request of a guardian, support recipient, support team, or Home Alliance or other relevant stakeholder. This may be due to the risk level of person(s) served which may require extra diligence in ensuring recipient safety as specified in their support plan.
 - c. A K95 or similar close-fitting mask as well as additional personal protective equipment (PPE) may be required for employees upon return from isolation or for environments under isolation or quarantine, or under the direction of the Hope supervisor, Healthline, or Medical Director.
- 4. Avoid touching eyes, nose, or mouth with unwashed hands.
- 5. Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes.
- 6. Employees must ensure they have personal protective equipment such as gloves, face mask, and gowns if required. Hope will provide these to employees, but employees have a responsibility to report to their supervisor in a timely manner if these have not been made available to them in

order to work safely.

7. Disinfect frequently touched surfaces with an appropriate cleaning solution.

Testing for COVID-19

Rapid at-home tests and PCR are acceptable testing methods and may be used by employees and support recipients when experiencing symptoms or due to exposure. Hope will provide these tests free of charge to be used by employees and support recipients.

If an employee has any symptoms of illness, the employee is responsible to immediately notify their supervisor and should not report to the workplace. The employee should test for COVID-19 with a rapid or PCR test 72 hours after symptoms begin. If an employee tests too early, they should be advised to test again at 72 hours after symptom onset and then can be considered for clearance. The employee can return to a working status with a negative test result, improving symptoms, and clearance from their supervisor.

Employees are encouraged to test due to direct contact with someone diagnosed with COVID-19. Employees are expected to accept personal responsibility in being aware of their surroundings and the extent of their exposures, and carefully consider how their decisions to test or not test, mask or not mask, may impact those around them.

COVID Positive (+) Isolation and Clearance to Return to Work

An employee is generally not permitted to be at the worksite while positive for COVID-19 and on isolation.

An employee may be permitted to work while COVID + in the following circumstances:

- 1. As reviewed and approved by Hope's Medical Director or designee due to staffing hardships and/or business necessity.
- 2. If an employee can work remotely and is not at the worksite and does not have contact with coworkers or support recipients.

Isolation will occur when an employee tests positive for COVID-19. General guidelines for when an employee or support recipient may receive clearance by the supervisor:

- 1. Employee will be required to isolate for 5 days after symptoms of illness begin or test positive, whichever is sooner. After 5 days, if symptoms are improving, the employee may return to work with approval from their supervisor. The employee must wear a tight-fitting mask upon return to work such as a K95, for an additional 5 days.
- 2. If wearing a tight-fitting mask cannot be tolerated by a employee or support recipient, a minimum of 10 days of isolation is required.

Cleaning of Surfaces and Disinfecting

Hope has instituted regular housekeeping practices, which include cleaning and disinfecting common areas and other elements of the work environment, where possible. Employees should regularly do the same in their assigned work areas. Commonly touched areas in Hope facilities and assisted living homes should be cleaned regularly. If a surface is suspected to be potentially contaminated, the work area and site of contamination will be cleaned immediately.

Disinfection should be conducted using an EPA-registered household disinfectant, alcohol solution with at least 60% alcohol, or diluted household bleach solution. Hope will maintain Safety Data Sheets of all disinfectants used on site.

Employees are required to follow universal precautions as trained to annually in Bloodborne Pathogens training.

Visitors

Visitors are permitted in Hope facilities. Visitors must assess themselves for symptoms before or upon entry and sign the visitors log. Visitors must comply with general safety practices as expected of employees, including frequent hand washing and are recommended to wear a mask.

Personal Protective Equipment

Hope will provide personal protective equipment for employees at no cost to the employee as necessary, including providing surgical masks, N95s, K95s, gloves, gowns, etc. If an N95 mask is worn, this is voluntarily done by the employee. When a N95 mask is provided by Hope, the employee will receive instructions with basic information on proper respirator use (OSHA Appendix D to 1910.134).

Vaccination

Hope respects employees' right to choose whether to vaccinate or not. Hope encourages all employees to receive a COVID-19 vaccination to protect themselves, other employees, and those who choose our services.

Internal Communications

If a resident of an assisted living home tests positive for COVID-19, the supervisor of the home is required to notify the following internal positions: Director of Community Supports, Health Supports Manager, Director of Properties & Maintenance, and the Foster Care & Adult Licensing Specialist.

If an assisted living home has any residents who are ill from any communicable diseases, including COVID-19, it is the responsibility of the Lead or Home Alliance Coordinator to alert any visitors of the home of potential exposure risk. This includes all visitors to the home, which could include maintenance, care coordinators, guardians, external vendors etc.

Critical Incident Reporting

If a confirmed case of COVID-19 is reported for a support recipient who lives in an Assisted Living Home, a Critical Incident Report with the State of Alaska must be filed within 24 hours if medical intervention is required as described in regulations. Medical intervention is an evaluation by, or consultation with, medical personnel, whether internal or external, to determine an appropriate treatment or course of action. A CIR should be filed when there is any communication with medical personnel, whether internal within Hope or with external providers, regarding the best course of treatment given their symptoms of COVID-19. The CIR should be filed by the supervisor who oversees the support recipient's care. In the event of any scheduled onsite State activity, an additional report will be made by Hope's Licensing staff member(s) to the State of Alaska Licensing department for any assisted living home locations that are on quarantine or isolation status.

OSHA Recordkeeping & Workers' Compensation

If a confirmed case of COVID-19 is reported for an employee, Hope's Human Resources department will determine if it meets the criteria for recordability and reportability under OSHA's recordkeeping rule. The HR department will assess any workplace exposures to determine if the case is work-related. Work-relatedness is assumed 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. If an employee develops COVID-19 solely from an exposure outside of the work environment, it would not be work-related, and would not be recordable to OSHA or workers' compensation insurance.

The HR department's assessment will consider the work environment itself, the type of work performed, risk of person-to-person transmission given the work environment, and other factors such as community spread. If an employee has a confirmed case of COVID-19 that is considered work-related, Hope will report the case to OSHA if it results in a fatality or an in-patient hospitalization within 8-hours of the exposure incident occurring.

If a COVID positive case is determined by the HR department to be work-related, a workers' compensation claim will be filed on the employee's behalf. Whether the claim is approved under workers' compensation is at the discretion of the adjusting company and the insurer.

Confidentiality/Privacy

Except for circumstances in which Hope is legally required to report workplace occurrences of communicable disease, the confidentiality of all employee and recipient medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. Hope reserves the right to inform other employees that a co-worker (without disclosing an employee's name) has been diagnosed with COVID-19 if other employees might have been exposed to the disease, so other employees may take measures to protect their own health.

Anti-Retaliation

Employees have a right to a safe workplace and to the protections required under OSHA's General Duty

Clause. Hope will not discriminate or retaliate against any employee for exercising their right to protections required by under OSHA. If an employee has any concerns about safety in the workplace, they can reach out to any member of the COVID-19 team listed in this policy or to the Director of Human Resources so the concern can be reviewed and responded to swiftly and appropriately.

Policy Administration

The following team is responsible for policy administration and communication, and are responsible for updates to this policy:

Name	Title	Phone Number	E-Mail
Dr. William Browner	Medical Director	907-433-4792	wbrowner@hopealaska.org
Jo-Anne Sullivan, RN	Deputy Director of Health & Wellness	907-433-4778	jsullivan@hopealaska.org
Michele Girault	Executive Director	907-433-4705	mgirault@hopealaska.org
Michael Bailey	Deputy Executive Director	907-433-4721	mbailey@hopealaska.org
Raymond Collins	Program Administrator	907-433-1706	rcollins@hopealaska.org
Sharayah Talarovich	Chief Workforce & Risk Officer	907-433-4769	stalarovich@hopealaska.org

The Hope Healthline can be reached at hopehealthline@hopealaska.org or 907-433-4780. As of this updated policy in January 2023, centralized reporting to the Hope Healthline is no longer required, however, the Hope Healthline remains a supportive resource for supervisors and employees as needed to answer questions.

Resources

- 1. Dr. William Browner, Medical Director for Hope Community Resources, Inc.
- 2. US Department of Labor Occupational Safety & Health Administration (OSHA). (2021). *Protecting Workers: Guidance on Mitigating and Preventing the Spread of COVID-19 in the Workplace*. Retrieved from: https://www.osha.gov/coronavirus/safework
- 3. Centers for Disease Control and Prevention (CDC). (2021). COVID-19 Workplaces and Businesses Workplace Prevention Strategies. Retrieved from: https://www.cdc.gov/coronavirus/2019-ncov/community/workplaces-businesses/index.html
- 4. U.S. Equal Employment Opportunity Commission (EEOC). (2022). What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws. Retrieved from: https://www.eeoc.gov/wysk/what-you-should-know-about-covid-19-and-ada-rehabilitation-act-and-other-eeo-laws

- 5. Alaska Department of Health and Social Services (DHSS) Division of Health Care Services Residential Licensing. (2021). *COVID-19 Recommended Guidance for Congregate Residential Setting*. Retrieved from:
 - https://dhss.alaska.gov/dph/Epi/id/SiteAssets/Pages/HumanCoV/VisitationGuidelines_Residential_ CongregateFacilities.pdf
- 6. Alaska Department of Health and Social Services (DHSS). (2022). *COVID-19 in Alaska*. Retrieved from: https://dhss.alaska.gov/dph/Epi/id/Pages/COVID-19/default.aspx
- 7. State of Alaska Department of Labor and Workforce Development (DOL). (2021). COVID-19 Exposure Prevention, Preparedness, and Response Safety Plan. Retrieved from: https://labor.alaska.gov/lss/training/COVID-19 Safety Plan Example Template.docx