

Occupational Health Connections' COVID-19 ETS Plan

1. Purpose and Scope

Occupational Health Connections (OHC) is committed to providing a safe and healthy workplace for all our employees. OHC has developed the following COVID-19 plan, which includes policies and procedures to minimize the risk of transmission of COVID-19, in accordance with OSHA's COVID-19 Emergency Temporary Standard (ETS).

Occupational Health Connections has multiple workplaces that are substantially similar, and therefore has developed a single COVID-19 plan for the substantially similar workplaces.

2. Roles and Responsibilities

Occupational Health Connections' goal is to prevent the transmission of COVID-19 in the workplace(s). Managers as well as employees are all responsible for supporting, complying with, and providing recommendations to further improve this COVID-19 plan.

The COVID-19 Safety Coordinator(s), listed below, implements and monitors this COVID-19 plan. The COVID-19 Safety Coordinator(s) has Occupational Health Connections' full support in implementing and monitoring this COVID-19 plan and has authority to ensure compliance with all aspects of this plan.

Occupational Health Connections will work cooperatively with employees to conduct a workplace-specific hazard assessment and in the development, implementation, and updating of this COVID-19 plan.

All employees are requested to provide input and suggestions to this program.

COVID-19 Safety Coordinator(s)		
Name	Title/Facility Location	Contact Information (office location, phone, email address)
Nancy Clover	OHC	978-686-9739 Nancy@OccHealthConnections.com

3. Hazard Assessment and Worker Protections

Occupational Health Connections will conduct a workplace-specific hazard assessment of its workplace(s) to determine potential workplace hazards related to COVID-19. A hazard assessment will be conducted initially and whenever changes at the workplace create a new potential risk of employee exposure to COVID-19 (e.g., new work activities at the workplace).

Occupational Health Connections will address the hazards identified by OHC employees and include policies and procedures to minimize the risk of transmission of COVID-19 for each employee. These policies and procedures are as follows:

Patient Screening and Management

In settings where direct patient care is provided, OHC with the assistance of the specific site will:

- Limit and monitor points of entry to the setting;
- Screen and triage all clients, patients, residents, delivery people, visitors, and other non-employees entering the setting for symptoms of COVID-19;

- Implement other applicable patient management strategies in accordance with the CDC’s [“COVID-19 Infection Prevention and Control Recommendations”](#).

Standard and Transmission-Based Precautions

Occupational Health Connections will follow the policies and procedures to adhere to Standard and Transmission-Based Precautions in accordance with CDC’s [“Guidelines for Isolation Precautions.”](#)

Personal Protective Equipment (PPE)

Occupational Health Connections will provide, and ensure that employees wear, facemasks, or a higher level of respiratory protection. Facemasks must be worn by employees over the nose and mouth when indoors and when occupying a vehicle with another person for work purposes. Policies and procedures for facemasks will be implemented, along with the other provisions required by OSHA’s COVID-19 ETS, as part of a multi-layered infection control approach.

Facemasks provided by Occupational Health Connections will be FDA-cleared, authorized by an FDA Emergency Use Authorization, or otherwise offered or distributed as described in an FDA enforcement policy. Occupational Health Connections will provide employees with a sufficient number of facemasks, which must be changed at least once a day, whenever they are soiled or damaged, and more frequently as necessary (e.g., patient care reasons).

Facemasks **MUST** be worn on all job sites. If the site does not provide them – contact Nancy Clover and OHC will provide them.

Paragraph (a)(4) of the ETS exempts **fully vaccinated employees** from the PPE requirements of the ETS when in well-defined areas where there is no reasonable expectation that any person with suspected or confirmed COVID-19 will be present. The following are additional exceptions to Occupational Health Connections’ requirements for facemasks:

1. When an employee is alone in a room.
2. While an employee is eating and drinking at the workplace, provided each employee is at least 6 feet away from any other person, or separated from other people by a physical barrier.
3. When it is important to see a person’s mouth (e.g., communicating with an individual who is deaf or hard of hearing) and the conditions do not permit a facemask that is constructed of clear plastic (or includes a clear plastic window). When this is the case, Occupational Health Connections will ensure that each employee wears an alternative, such as a face shield, if the conditions permit.
4. When employees cannot wear facemasks due to a medical necessity, medical condition, or disability as defined in the Americans with Disabilities Act (42 USC 12101 et seq.), or due to religious belief. Exceptions will be provided for a narrow subset of persons with a disability who cannot wear a facemask or cannot safely wear a facemask, because of the disability, as defined with the Americans with Disability Act (42 USC 12101 et seq.), including a person who cannot independently remove the facemask. The remaining portion of the subset who cannot wear a facemask may be exempted on a case-by-case basis as required by the Americans with Disability Act and other applicable laws. When an exception applies, Occupational Health Connections will ensure that any such employee wears a face shield, if their condition or disability permits it. Occupational Health Connections will provide accommodations for religious beliefs consistent with Title VII of the Civil Rights Act.

If a face shield is required to comply with OSHA’s COVID-19 ETS or OHC otherwise requires use of a face shield, Occupational Health Connections’ employees will ensure that face shields are cleaned at least daily and are not damaged.

Occupational Health Connections will not prevent any employee from voluntarily wearing their own facemask and/or face shield in situations when they are not required unless doing so would create a hazard of serious injury or death, such as interfering with the safe operation of equipment.

In addition to providing, and ensuring employees wear, facemasks, OHC will provide protective clothing and equipment (e.g., respirators, gloves, gowns, goggles, face shields) to each employee in accordance with Standard and Transmission-Based Precautions in healthcare settings in accordance with CDC's "[Guidelines for Isolation Precautions](#)," and ensure that the protective clothing and equipment is used in accordance with OSHA's PPE standards (29 CFR 1910 subpart I). If an employee feels they need additional PPE they are to contact Nancy Clover.

For employees with exposure to people with suspected or confirmed COVID-19, Occupational Health Connections will provide PPE, including gloves, an isolation gown or protective clothing, and eye protection.

Occupational Health Connections and employees will work collaboratively to assess and address COVID-19 hazards, including when there is employee exposure to people with suspected or confirmed COVID-19. [[OSHA's COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis may be used.](#)]

Physical Distancing

Occupational Health Connections will ensure that each employee is separated from all other people in the workplace by at least 6 feet when indoors, unless it can be demonstrated that such physical distance is not feasible for a specific activity. Where maintaining 6 feet of physical distance is not feasible, Occupational Health Connections will ensure employees are as far apart from other people as possible. Physical distancing will be implemented, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach.

Physical Barriers

Occupational Health Connections and the employee will work collaboratively to identify where physical barriers are needed. [OSHA's COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis](#) may be used to identify where to install physical barriers for employee protection from COVID-19. Physical barriers are not required in direct patient care areas or resident rooms.

Where feasible, Occupational Health Connections will ensure that:

- Physical barriers are solid and made from impermeable materials;
- Physical barriers are easily cleanable or disposable;
- Physical barriers are sized (i.e., height and width) and located to block face-to-face pathways between individuals based on where each person would normally stand or sit;
- Physical barriers are secured so that they do not fall or shift, causing injury or creating a trip or fall hazard;
- Physical barriers do not block workspace air flow or interfere with the heating, ventilation, and air conditioning (HVAC) system operation;
- Physical barriers are transparent in cases where employees and others have to see each other for safety; and
- Physical barriers do not interfere with effective communication between individuals.

Cleaning and Disinfection

OHC will implement policies and procedures for cleaning, disinfection, and hand hygiene, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach. Occupational Health Connections will work collaboratively with employees to implement cleaning, disinfection, and hand hygiene in the workplace. [[OSHA's COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis may be used to assess COVID-19-related hazards and develop and implement policies and procedures for cleaning and disinfection.](#)]

In patient care areas, resident rooms, and for medical devices and equipment:

Occupational Health Connections will follow standard practices for cleaning and disinfection of surfaces and equipment in accordance with CDC's "[COVID-19 Infection Prevention and Control Recommendations](#)" and CDC's "[Guidelines for Environmental Infection Control](#)."

In all other areas:

Occupational Health Connections requires the cleaning of high-touch surfaces and equipment at least once a day, following manufacturers' instructions for the application of cleaners.

When a person who is COVID-19 positive has been in the workplace within the last 24 hours, Occupational Health Connections requires cleaning and disinfection, in accordance with CDC's "[Cleaning and Disinfecting Guidance](#)," of any areas, materials, and equipment that have likely been contaminated by that person (e.g., rooms they occupied, items they touched).

Client will provide alcohol-based hand rub that is at least 60% alcohol or provide readily accessible hand washing facilities.

Health Screening and Medical Management

Health Screening

Occupational Health Connections will require each employee to self-screen for covid symptoms and temperature before each workday and each shift.

Employee Notification to Employer of COVID-19 Illness or Symptoms

OHC will require employees to promptly notify Nancy Clover when they have tested positive for COVID-19 or been diagnosed with COVID-19 by a licensed healthcare provider, have been told by a licensed healthcare provider that they are suspected to have COVID-19, are experiencing recent loss of taste and/or smell with no other explanation, or are experiencing both fever ($\geq 100.4^{\circ}$ F) and new unexplained cough associated with shortness of breath.

Occupational Health Connections requires a phone call or email to be sent to Nancy Clover if they are sick or experiencing symptoms while at home or at work.

Employees may use their paid time off if they are sick. They may also apply for Family Medical Leave Act.

Employer Notification to Employees of COVID-19 Exposure in the Workplace

Occupational Health Connections will notify employees if they have been exposed to a person with COVID-19 at their workplace, as described below. The notification provisions below are not triggered by the presence of a patient with confirmed COVID-19 in a workplace where services are normally provided to suspected or confirmed COVID-19 patients (e.g., emergency rooms, urgent care facilities, COVID-19 testing sites, COVID-19 wards in hospitals). When Occupational Health Connections is notified that a person who has been in the workplace (including employees, clients, patients, residents, vendors, contractors, customers, delivery people and other visitors, or other non-employees) is COVID-19 positive, Occupational Health Connections will, within 24 hours:

- Notify each employee who was not wearing a respirator and any other required PPE and has been in close contact with the person with COVID-19 in the workplace. The notification must state the fact that the employee was in close contact with someone with COVID-19 along with the date(s) the contact occurred.
- Notify all other employees who were not wearing a respirator and any other required PPE and worked in a well-

defined portion of a workplace (e.g., a particular floor) in which the person with COVID-19 was present during the potential transmission period. The notification must specify the date(s) the person with COVID-19 was in the workplace during the potential transmission period.

- Notify other employers whose employees were not wearing a respirator and any other required PPE and have been in close contact with the person with COVID-19, or worked in a well-defined portion of a workplace (e.g., a particular floor) in which that person was present, during the potential transmission period. The notification must specify the date(s) the person with COVID-19 was in the workplace during the potential transmission period and the location(s) where the person with COVID-19 was in the workplace.

Notifications will not include the name, contact information, or occupation of the COVID-19 positive person.

Note: Close contact means being within 6 feet of the person for a cumulative total of 15 minutes or more over a 24-hour period during the person's potential transmission period. The potential transmission period runs from 2 days before the person felt sick (or, if not showing symptoms, 2 days before testing) until the time the person is isolated.

Occupational Health Connections will notify employees of COVID-19 exposure via phone call or email.

Medical Removal from the Workplace

Occupational Health Connections has also implemented a policy for removing employees from the workplace in certain circumstances. Occupational Health Connections will immediately remove an employee from the workplace when:

- The employee is COVID-19 positive (i.e., confirmed positive test for, or has been diagnosed by a licensed healthcare provider with, COVID-19);
- The employee has been told by a licensed healthcare provider that they are suspected to have COVID-19;
- The employee is experiencing recent loss of taste and/or smell with no other explanation; or
- The employee is experiencing both a fever of at least 100.4°F and new unexplained cough associated with shortness of breath.

For employees removed because they are COVID-19 positive, Occupational Health Connections will keep them removed until they meet the return-to-work criteria discussed below. For employees removed because they have been told by a licensed healthcare provider that they are suspected to have COVID-19, or are experiencing symptoms as discussed above, will keep them removed [until they meet the return-to-work criteria discussed below or keep them removed and provide a COVID-19 polymerase chain reaction (PCR) test at no cost to the employee. If the employee tests negative, they can return to work immediately. If the employee tests positive or refuses a test, they must remain excluded from the workplace until the return-to-work criteria below are met. If the employee refuses to take the test, Occupational Health Connections will continue to keep the employee removed from the workplace, but is not obligated to provide the medical removal protection benefits discussed below.

If Occupational Health Connections notifies an employee that they were in close contact with a person in the workplace (including employees, clients, patients, residents, vendors, contractors, customers, delivery people and other visitors, or other non-employees) who is COVID-19 positive when that employee was not wearing a respirator (FACE MASKS ARE REQUIRED ON ALL WORKSITES!!!!) and any other required PPE, Occupational Health Connections will immediately remove the employee from the workplace unless:

1. The employee does not experience recent loss of taste and/or smell with no other explanation, or fever of at least 100.4°F and new unexplained cough associated with shortness of breath; **AND**
2. The employee has either been fully vaccinated against COVID-19 (i.e., 2 weeks or more following the final dose) or had COVID-19 and recovered within the past 3 months.

Occupational Health Connections will keep the employee removed from the workplace [for 14 days or will keep the employee removed and provide a COVID-19 test at least 5 days after the exposure at no cost to the employee. If the

employee tests negative, they may return to work 7 days following exposure. If the employee tests positive, the employee must remain excluded from the workplace until the return-to-work criteria below are met. If the employee refuses a test, Occupational Health Connections will keep the employee excluded for 14 days but is not obligated to provide the medical removal protection benefits discussed below.

Any time an employee must be removed from the workplace, Occupational Health Connections may require the employee to work remotely or in isolation if suitable work is available. When allowing an employee to work remotely or in isolation, Occupational Health Connections will continue to pay that employee the same regular pay and benefits the employee would have received had the employee not been absent.

Occupational Health Connections will not subject its employees to any adverse action or deprivation of rights or benefits because of their removal from the workplace due to COVID-19.

Return to Work Criteria

Occupational Health Connections will only allow employees who have been removed from the workplace to return to work in accordance with guidance from a licensed healthcare provider or in accordance with the CDC's "[Isolation Guidance](#)" and "[Return to Work Healthcare Guidance](#)." Pursuant to CDC guidance, symptomatic employees may return to work after all the following are true:

- At least 10 days have passed since symptoms first appeared, and
- At least 24 hours have passed with no fever without fever-reducing medication, and
- Other symptoms of COVID-19 are improving (loss of taste and smell may persist for weeks or months and need not delay the end of isolation).

If an employee has severe COVID-19 or an immune disease, Occupational Health Connections will follow the guidance of a licensed healthcare provider regarding return to work.

Pursuant to CDC guidance, asymptomatic employees may return to work after at least 10 days have passed since a positive COVID-19 test. If an employer receives guidance from a healthcare provider that the employee may not return to work, they must follow that guidance.

Medical Removal Protection Benefits

Occupational Health Connections will continue to pay employees who have been removed from the workplace under the medical removal provisions of OSHA's COVID-19 ETS. When an employee has been removed from the workplace and is not working remotely or in isolation.

Occupational Health Connections will continue to provide the pay the employee the same regular pay the employee would have received had the employee not been absent from work, up to \$1,400 per week per employee. For employers with fewer than 500 employees, the employer must pay the employee up to the \$1,400 per week cap but, beginning in the third week of an employee's removal, the amount is reduced to only two-thirds of the same regular pay the employee would have received had the employee not been absent from work, up to \$200 per day (\$1000 per week in most cases).

- The ETS also provides that the employer's payment obligation is reduced by the amount of compensation the employee receives from any other source, such as a publicly or employer-funded compensation program (e.g., paid sick leave, administrative leave), for earnings lost during the period of removal or any additional source of income the employee receives that is made possible by virtue of the employee's removal.

Vaccination

Occupational Health Connections encourages employees to receive the COVID-19 vaccination as a part of a multi-layered infection control approach. Occupational Health Connections will support COVID-19 vaccination for each employee by providing reasonable time and paid leave to each employee for vaccination and any side effects experienced following vaccination.

Training

Occupational Health Connections will implement policies and procedures for employee training, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach.

Occupational Health Connections' COVID-19 training program is included in its annual BBP and standard precaution training will be accessible in the following ways: online education.

Occupational Health Connections will ensure that each employee receives training, in a language and at a literacy level the employee understands, on the following topics:

- COVID-19, including:
 - How COVID-19 is transmitted (including pre-symptomatic and asymptomatic transmission);
 - The importance of hand hygiene to reduce the risk of spreading COVID-19 infections;
 - Ways to reduce the risk of spreading COVID-19 through proper covering of the nose and mouth;
 - The signs and symptoms of COVID-19;
 - Risk factors for severe illness; and
 - When to seek medical attention;
- Occupational Health Connections' policies and procedures on patient screening and management;
- Tasks and situations in the workplace that could result in COVID-19 infection;
- Workplace-specific policies and procedures to prevent the spread of COVID-19 that are applicable to the employee's duties (e.g., policies on Standard and Transmission-Based Precautions, physical distancing, physical barriers, ventilation, aerosol-generating procedures);
- Employer-specific multi-employer workplace agreements related to infection control policies and procedures, the use of common areas, and the use of shared equipment that affect employees at the workplace;
- Occupational Health Connections' policies and procedures for PPE worn to comply with OSHA's COVID-19 ETS, including:
 - When PPE is required for protection against COVID-19;
 - Limitations of PPE for protection against COVID-19;
 - How to properly put on, wear, and take off PPE;
 - How to properly care for, store, clean, maintain, and dispose of PPE; and
 - Any modifications to donning, doffing, cleaning, storage, maintenance, and disposal procedures needed to address COVID-19 when PPE is worn to address workplace hazards other than COVID-19;
- Workplace-specific policies and procedures for cleaning and disinfection;
- Occupational Health Connections' policies and procedures on health screening and medical management.
- Available sick leave policies, any COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws, and other supportive policies and practices (e.g., telework, flexible hours);
- The identity of Occupational Health Connections' Safety Coordinator(s) specified in this COVID-19 plan.
- OSHA's COVID-19 ETS; and
- How the employee can obtain copies of OSHA's COVID-19 ETS and any employer-specific policies and procedures developed under OSHA's COVID-19 ETS, including this written COVID-19 plan.

Occupational Health Connections will ensure that the training is overseen or conducted by a person knowledgeable in the covered subject matter as it relates to the employee's job duties, and that the training provides an opportunity for interactive questions and answers with a person knowledgeable in the covered subject matter as it relates to the

employee's job duties.

Occupational Health Connections will provide additional training whenever changes occur that affect the employee's risk of contracting COVID-19 at work (e.g., new job tasks), policies or procedures are changed, or there is an indication that the employee has not retained the necessary understanding or skill.

Anti-Retaliation

Occupational Health Connections will inform each employee that employees have a right to the protections required by OSHA's COVID-19 ETS, and that employers are prohibited from discharging or in any manner discriminating against any employee for exercising their right to protections required by OSHA's COVID-19 ETS, or for engaging in actions that are required by OSHA's COVID-19 ETS.

Occupational Health Connections will not discharge or in any manner discriminate against any employee for exercising their right to the protections required by OSHA's COVID-19 ETS, or for engaging in actions that are required by OSHA's COVID-19 ETS.

Requirements implemented at no cost to employees

OHC will comply with the provisions of OSHA's COVID-19 ETS at no cost to its employees, with the exception of any employee self-monitoring conducted under the Health Screening and Medical Management section of this Plan.

Recordkeeping

Occupational Health Connections will retain all versions of this COVID-19 plan implemented to comply with OSHA's COVID-19 ETS while the ETS remains in effect.

OHC will establish and maintain a COVID-19 log to record each instance in which an employee is COVID-19 positive, regardless of whether the instance is connected to exposure to COVID-19 at work. The COVID-19 log will contain, for each instance, the employee's name, one form of contact information, occupation, location where the employee worked, the date of the employee's last day at the workplace, the date of the positive test for, or diagnosis of, COVID-19, and the date the employee first had one or more COVID-19 symptoms, if any were experienced.

Occupational Health Connections will record the information on the COVID-19 log within 24 hours of learning that the employee is COVID-19 positive. Occupational Health Connections will maintain the COVID-19 log as a confidential medical record and will not disclose it except as required by OSHA's COVID-19 ETS or other federal law.

OHC will maintain and preserve the COVID-19 log while OSHA's COVID-19 ETS remains in effect.

By the end of the next business day after a request, OHC will provide, for examination and copying:

- All versions of the written COVID-19 plan to all of the following: any employees, their personal representatives, and their authorized representatives.
- The individual COVID-19 log entry for a particular employee to that employee and to anyone having written authorized consent of that employee;
- A version of the COVID-19 log that removes the names of employees, contact information, and occupation, and only includes, for each employee in the COVID-19 log, the location where the employee worked, the last day that the employee was at the workplace before removal, the date of that employee's positive test for, or diagnosis of, COVID-19, and the date the employee first had one or more COVID-19 symptoms, if any were

experienced, to all of the following: any employees, their potential representatives, and their authorized representatives.

Reporting

Occupational Health Connections will report to OSHA:

- Each work-related COVID-19 fatality within 8 hours of Occupational Health Connections learning about the fatality;
- Each work-related COVID-19 in-patient hospitalization within 24 hours of OHC learning about the in-patient hospitalization.

4. Monitoring Effectiveness

Occupational Health Connections will work collaboratively with employees to monitor the effectiveness of this COVID-19 plan to ensure ongoing progress and efficacy.

Occupational Health Connections will update this COVID-19 plan as needed to address changes in workplace-specific COVID-19 hazards and exposures.

5. Coordination with Other Employers

Occupational Health Connections will communicate this COVID-19 plan with all other employers that share the same worksite and will coordinate with each employer to ensure that all workers are protected.

OHC will adjust this COVID-19 plan to address any hazards presented by employees of other employers at the worksite.

6. Signature and Plan Availability

Occupational Health Connections has prepared and issued this COVID-19 plan on June 28, 2021.

Employer Name:	Occupational Health Connections
Address:	PO Box 2106 Methuen, MA 01844
Business Owner:	Nancy Clover

This COVID-19 plan is available:

X Via hard copy at [office location]	Posted to OHC website	<input type="checkbox"/> Available by request. Nancy Clover
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