



COVID-19 Preparedness & Response Plan

For Lower and Medium Exposure Risk Employers ONLY

📌 General

The following COVID-19 preparedness & response plan has been established for Fresh Perspective Home Care in accordance with MIOSHA Emergency Rules for Coronavirus disease 2019 (COVID-19). The purpose of this plan is to minimize or eliminate employee exposure to SARS-CoV-2.

The Emergency Rules have general safeguards applicable for all workplaces and specific safeguards for certain industries. Michael Beckett has read these emergency rules carefully, developed the safeguards appropriate to Fresh Perspective Home Care based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

Fresh Perspective Home Care has designated one or more worksites supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The worksite supervisor(s) are Shelly Nutter, Maureen Jonas, and Hope Partanen. A supervisor will always remain on-site when employees are present on site. An on-site employee may be designated to perform the supervisory role.

The plan will be made readily available to our employees and their representatives. The plan will be made available via website, internal network and/or hard copy.

📌 Exposure Determination

Fresh Perspective Home Care has evaluated routine and reasonably anticipated tasks and procedures for all employees to determine whether there is actual or reasonably anticipated employee exposure to SARS-CoV-2. Shelly Nutter or Maureen Jonas are responsible for the exposure determination.

Fresh Perspective Home Care has determined that its employees' jobs fall into only the

lower exposure and medium exposure risk categories as defined by the OSHA Guidance on Preparing Workplaces for COVID-19:

- **Lower Exposure Risk Jobs.** These jobs do not require contact with known or suspected cases of COVID-19 nor frequent close contact (for example, within six feet) with the general public. Workers in this category have minimal occupational contact with the public and other coworkers. Examples are small offices, small manufacturing plants (less than 10 employees), small construction operations (less than 10 employees), and low-volume retail establishments, provided employees have infrequent close contact with coworkers and the public.

- **Medium Exposure Risk Jobs.** These jobs are those that require frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients. Examples are most jobs at manufacturing plants, construction sites, schools, high-volume retail settings, and other high-population-density work environments.

Michael Beckett CEO verifies that Fresh Perspective Home Care has no high-risk exposure jobs. High exposure risk jobs have high potential for exposure to known and suspected cases of COVID-19. Examples are most jobs in healthcare, medical transport, nursing homes and residential care facilities, mortuaries, law enforcement, and correctional facilities. This sample plan is not intended for employers who have high exposure risk jobs.

Fresh Perspective Home Care has categorized its jobs as follows:

NOTE: Some jobs may have more than one type of exposure risk depending on the task or qualifying factors.

| Job/Task | Exposure Risk Determination (Lower or Medium) | Qualifying Factors (Ex. No Public Contact, Public Contact) |
|------------------------------|--|---|
| CEO | Low | No Public Contact |
| Area Vice President | Low | Minimal / Social Distance |
| Director of Nursing and Care | Low | Minimal / Social Distance |
| Client Scheduling Manager | Low | Minimal / Social Distance |
| LPN Caregiver | Medium | Controlled Public Contact |
| Caregivers / Schedulers | Medium | Controlled Public Contact |

Engineering Controls

Fresh Perspective Home Care has implemented feasible engineering controls to minimize or eliminate employee exposure to SARS-CoV-2. Engineering controls involve isolating employees from work-related hazards using ventilation and other engineered solutions. In workplaces where they are appropriate, these types of controls reduce exposure to hazards without relying on worker behavior and can be the most cost-effective solution to implement.

For lower exposure risk jobs, new engineering controls are not required. For medium exposure risk jobs, engineering controls can include:

- Installing physical barriers (such as clear plastic sneeze guards) between coworkers or between workers and customers.
- Installing a drive-through window for customer service.
- Increasing the amount of ventilation in the building.
- Increasing the amount of fresh outdoor air that is introduced into the building.

Michael Beckett CEO is responsible for seeing that the correct engineering controls are chosen, installed, maintained for effectiveness, and serviced when necessary.

The following engineering controls have been implemented:

| Job/Task | Engineering Control |
|---------------------------------------|--|
| LOCKED TO PUBLIC | Locked Doors |
| Controlled and Limited to Field Staff | Screening and verifying Necessity of Visit |
| Desk Spacing | Moved to be socially distanced |
| Designated areas for specific tasks | Infection Control P&P followed |
| All deliveries in a designated space | Infection Control P&P followed |

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. Michael Beckett CEO is responsible for seeing that the correct administrative controls are chosen, implemented, and maintained for effectiveness.

The following administrative controls have been established for Fresh Perspective Home Care.

WE ARE MAINTAINING MINIMUM REQUIRED OFFICE STAFF.

| Job/Task | Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers) |
|-----------------------------|---|
| Office Staff | Maintain at least six feet from everyone on the worksite. |
| Office Staff | Use ground markings, signs, and physical barriers to prompt employees to remain six feet from others. |
| Office Staff | Promote remote work (telecommuting) to the fullest extent possible. |
| All Employees | Restrict business-related travel for employees to essential travel only. |
| Office Staff | Restrict face-to-face meetings. Communicate with others through phone, email, teleconferencing, and web conferencing. |
| All Employees and Customers | Restrict the number of customers in the establishment at any given time. |
| All Employees | Minimize the sharing of tools, equipment, and items. |
| All Employees | Provide employees with non-medical grade face coverings (cloth face coverings). |
| All Employees | Require employees to wear cloth face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace. |
| All Employees | Require customers and the public to wear cloth face coverings. |
| All Employees | Keep customers informed about symptoms of COVID-19 and ask sick customers to stay at home until healthy again. Encourage sick customers to use drive-through services, curbside pickup, or home delivery. |
| Office Staff | Encourage customers to place service requests through the phone or web. |
| Office Staff | Promote curbside and home delivery to minimize contact with customers. |
| All Employees | Encourage proper cough and sneeze etiquette by employees, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands. |
| All Employees | Ensure that sick leave policies are flexible and consistent with public health guidance, so employees do not go to work sick. |
| All Employees | Maintain flexible policies that permit employees to stay home to care for a sick family member. |

Hand Hygiene

Shelly Nutter, Maureen Jonas, & Hope Partanen are responsible for seeing that

adequate handwashing facilities are available in the workplace and that regular handwashing is required. Frequency of such handwashing will be determined in part by factors such as when and how often the employees' hands are potentially exposed to SARS-CoV-2. When handwashing facilities are not available, Fresh Perspective Home Care shall provide employees with antiseptic hand sanitizers or towelettes. Fresh Perspective Home Care will provide time for employees to wash hands frequently and to use hand sanitizer.

Fresh Perspective Home Care shall promote frequent and thorough hand washing, including by providing workers, customers, and worksite visitors with a place to wash their hands. If soap and running water are not immediately available, provide antiseptic hand sanitizers or alcohol-based hand towelettes containing at least 60 percent alcohol.

Disinfection of Environmental Surfaces

Fresh Perspective Home Care will increase facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (for example, door handles), paying special attention to parts, products, and shared equipment (for example tools, machinery, vehicles). Fresh Perspective Home Care will make cleaning supplies available to employees upon entry and at the worksite.

Shelly Nutter, Maureen Jonas, & Hope Partanen are responsible for seeing that environmental surfaces in the workplace are cleaned and disinfected. Frequency of such disinfection will be determined in part by factors such as when and how often the environmental surfaces are potentially exposed to SARS-CoV-2. When choosing cleaning chemicals, Fresh Perspective Home Care will consult information on Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens. Products with EPA-approved emerging viral pathogens claims are expected to be effective against SARS-CoV-2 based on data for harder to kill viruses. The manufacturer's instructions for use of all cleaning and disinfection products will be strictly adhered to.

The following is a list of environmental surfaces, methods used to disinfect, and the frequency of such disinfection:

| Surface | Method/Disinfectant Used | Schedule/Frequency |
|-----------------------|---------------------------------|-------------------------------------|
| Assigned Workspaces | Approved Cleaning / Sprays | End of each day and as area is used |
| Kitchen/Water Cooler | Approved Cleaning / Sprays | End of each day and as area is used |
| Bathroom(s) x3 | Approved Cleaning / Sprays | End of each day and as area is used |
| Unassigned workspaces | Approved Cleaning / Sprays | End of each day and as |

| | | |
|-------------------|----------------------------|-------------------------------------|
| | | area is used |
| Entry / Exit Ways | Approved Cleaning / Sprays | End of each day and as area is used |
| Storage Areas | Approved Cleaning / Sprays | End of each day and as area is used |

Fresh Perspective Home Care will perform enhanced cleaning and disinfection after persons confirmed to have COVID-19 have been in a work area. In the interim, that work area will be temporarily closed, and employees will be sent home or relocated. Shelly Nutter - Area Vice President is responsible for seeing that this protocol is followed.

The following methods will be used for enhanced cleaning and disinfection: Will determine as needed.

Personal Protective Equipment (PPE)

Fresh Perspective Home Care will provide employees with the types of personal protective equipment, including respirators if necessary, for protection from SARS-CoV-2 appropriate to the exposure risk associated with the job. The employer must follow current CDC and OSHA guidance for personal protective equipment

All types of PPE are to be:

- Selected based upon the hazard to the worker.
- Properly fitted and periodically refitted as applicable.
- Consistently and properly worn.
- 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.

Fresh Perspective Home Care will provide non-medical grade face coverings (cloth face coverings) to employees (cloth face coverings are technically not considered PPE). Fresh Perspective Home Care will require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace. Fresh Perspective Home Care will consider face shields when employees cannot consistently maintain three feet of separation from other individuals in the workplace.

The following type(s) of PPE have been selected for use:

| Job/Task | PPE |
|-----------------|--|
| All employees | Provided – Masks, hand Sanitizer, gloves |
| | |

Health Surveillance

Fresh Perspective Home Care will conduct a daily entry self-screening protocol for all employees or contractors entering the workplace, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19, together with, if possible, a temperature screening. Shelly Nutter - Area Vice President is responsible for ensuring that all required health surveillance provisions are performed.

As workers enter the place of employment at the start of each work shift, Fresh Perspective Home Care will have employees self-screen for COVID-19. Fresh Perspective Home Care will have employees complete a questionnaire covering the signs and symptoms of COVID-19 and their exposure to people with suspected or confirmed COVID-19. When obtainable, a no-touch thermometer is used for temperature screening of employees. Fresh Perspective Home Care will similarly screen contractors, suppliers, and any other individuals entering the worksite.

Employees have been directed to promptly report any signs and symptoms of COVID-19 to before and during the work shift. Fresh Perspective Home Care has provided employees with instructions for how to make such a report to the employer.

The specific instructions for employee reporting signs and symptoms of COVID-19 are as follows:

- Daily Screenings for every client visit which is in an automated traceable format.
- If during the daily screening there is an answer that flags a possible COVID-19 concern an email will go to Shelly Nutter, Maureen Jonas, & Hope Partanen to immediately address the COVID-19 concern.
- Ongoing training and CDC required training as applicable.

(REPORTING INSTRUCTIONS PROVIDED TO EMPLOYEES)

Fresh Perspective Home Care will physically isolate any employees with known or suspected COVID-19 from the remainder of the workforce, using measures such as, but

are not limited to:

- Not allowing known or suspected cases to report to or remain at their work location.
- Sending known or suspected cases to a location (for example, home) where they are self-isolating during their illness
- Assigning known or suspected cases to work alone at the location where they are self-isolating during their illness.

Fresh Perspective Home Care will not discharge, discipline, or otherwise retaliate against employees who stay at home or who leave work when they are at particular risk of infecting others with COVID-19.

When an employee is identified with a confirmed case of COVID-19, Shelly Nutter - Area Vice president or Maureen Jonas - Director of Nursing and Care will notify the local public health department immediately, and any co-workers, contractors, or suppliers who may have come into contact with the person who is the confirmed case of COVID-19, within 24 hours. When notifying coworkers, contractors, and suppliers, Fresh Perspective Home Care will not reveal the name or identity of the confirmed case.

Fresh Perspective Home Care will allow employees with a confirmed or suspected case of COVID-19 to return to the workplace only after they are no longer infectious according to the latest guidelines from the CDC.

Training

Shelly Nutter - Area Vice President, Maureen Jonas - Director of Nursing and Care, and Hope Partanen - Client Scheduling Manager, will coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

Fresh Perspective Home Care will train workers on, at a minimum:

- Workplace infection-control practices.
- The proper use of personal protective equipment.
- Steps the employee must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
- How to report unsafe working conditions.

All training records are automated. Records should include the name of the employee(s) trained and the date of the training.

Recordkeeping

Fresh Perspective Home Care will maintain records of the following requirements:

- Training. The employer shall maintain a record of all COVID-19 employee training.
- Screening protocols. The employer shall maintain a record of screening for each employee or visitor entering the workplace.
- When an employee is identified with a confirmed case of COVID-19, record when the local public health department was notified; as well as any co-workers, contractors, or suppliers who may have come into contact with the person who was the confirmed case of COVID-19.

Shelly Nutter - Area Vice President will ensure a binder for clients and employees that contract COVID-19 are kept at the Fresh Perspective Home Care office.