

# COVID-19



**Exposure Prevention, Preparedness, and Response Plan**

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## Overview

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MOKA takes the health and safety of our employees very seriously. With the spread of the coronavirus or “COVID-19,” the agency must remain vigilant in mitigating the outbreak. In order to be safe and maintain operations, we have developed this COVID-19 Exposure Prevention, Preparedness, and Response Plan to be implemented, to the extent feasible and appropriate, throughout the agency. MOKA has also identified employees to monitor the related guidance that U.S. Center for Disease Control and Prevention (“CDC”) and Occupational Safety and Health Administration (“OSHA”) continue to make available.

This Plan is based on information available from the CDC, OSHA, and other public health authorities at the time of its development, and is subject to change based on further information provided by the CDC, OSHA, and other public officials. The agency may also amend this Plan based on operational needs.

## Exposure Determination

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We have identified the following potential sources of possible spread of COVID-19 in the workplace:

- The general public
- Individuals served
- Co-workers
- Vendors/visitors

MOKA employees fall into the following categories based on work location and job:

- Lower exposure risk (the work performed does not require direct contact with people known or suspected to be infected with COVID-19 or frequent close contact with the public).
- 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 confirmed or suspected to have COVID-19).
- High exposure risk (healthcare/personal care delivery and support staff exposed to known or suspected COVID-19 individuals served).
- Very high exposure risk (healthcare workers performing aerosol-generating procedures on known or suspected COVID-19 individuals served).

## COVID-19 Workplace Coordinators

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We have designated the following employees as our COVID-19 Workplace Coordinators:

**Emily Betz, Director of Programs**

Phone number: 616-719-4263 x417

Email: [ebetz@moka.org](mailto:ebetz@moka.org)

**Dorothy Bowne, HR Director**

Phone number: 231-830-9376 x633

Email: [dbowne@moka.org](mailto:dbowne@moka.org)

The coordinators are responsible for staying informed of federal, state and local guidance and incorporating those recommendations into the workplace. The coordinators are also responsible for reviewing human resources policies, procedures and practices to make sure that they are consistent with this plan and existing federal, state and local requirements.

## Responsibilities of Managers and Supervisors

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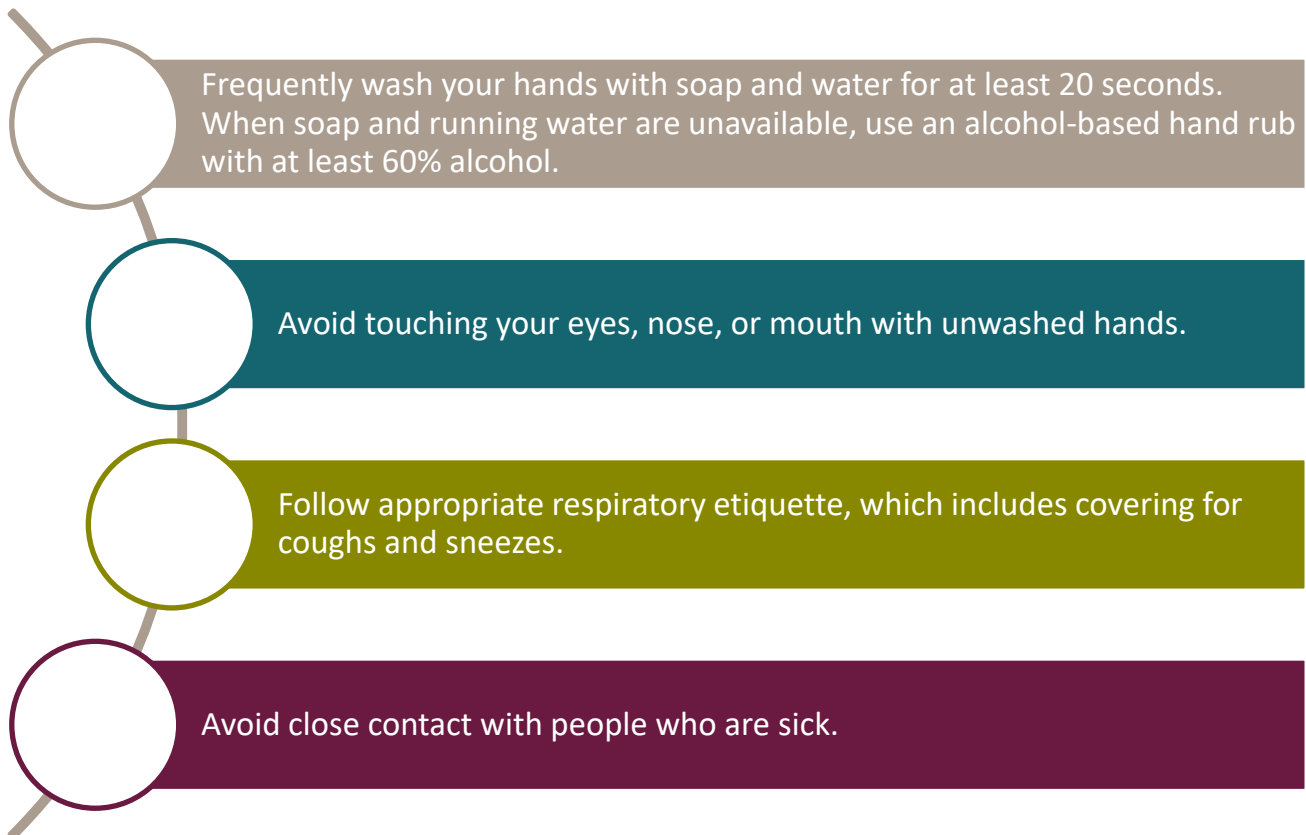
All managers and supervisors must be familiar with this Plan and be ready to answer questions from employees. Managers and supervisors must set a good example by following this Plan at all times. This involves practicing good personal hygiene and safety practices to prevent the spread of the virus. Managers and supervisors must encourage this same behavior from all employees. Department supervisors are responsible to implement, monitor and report on the COVID-19 control strategies contained in this Plan. This includes designating employees to fill this role when the supervisor is not on-site.

## Responsibilities of Employees

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MOKA 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 workplace, everyone must play their part. Below are described various housekeeping, social distancing, and other best practices to prevent the spread of the virus. All employees must follow these guidelines. 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 Emily Betz, Director of Programs or Dorothy Bowne, HR Director.

OSHA and the CDC have provided the following control and preventative guidance for all employees, regardless of exposure risk:



In addition, employees must familiarize themselves with the symptoms of COVID-19, which include the following:

Coughing

Fever

Shortness of breath, difficulty breathing; and

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. If you come into close contact with someone showing these symptoms, call your supervisor right away.

### Workplace Protective Measures

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The following protective measures apply at all work locations.

#### General Safety Practices

- MOKA will conduct entry screening for employees, individuals served, contractors, vendors, and anyone else entering work locations. This screening will, at minimum, include a self-reported questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19. Screening protocol may vary between work locations and service lines. Documentation of employee screenings, if generated, will be kept secured in a location separate from other employee records.
- Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave the location and return home.
- Employees must avoid physical contact with others whenever possible and shall direct others (co-workers/contractors/visitors) to increase personal space to at least six (6) feet, when possible. Where offices or internal rooms are used, only necessary employees should enter these spaces and all employees should maintain social distancing while inside.

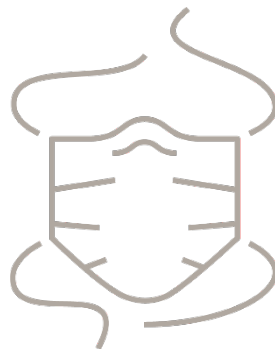
- Fabric face covers should be worn in areas where social distancing cannot be maintained. Face covers are not a replacement for social distancing.
- All in-person meetings will be limited. To the extent possible, meetings will be held virtually.
- There may be additional precautions specific to work locations and/or service lines; these will be shared with employees by supervisors.

### **Visitors**

- Visitors entering work locations, including the office, will be limited to only those necessary.
- All visitors will be screened in advance of arrival. If the visitor answers “yes” to any of the following questions, they should not be permitted to access:
  - ✓ 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 anyone who has been confirmed or suspected positive for COVID-19?

### **Personal Protective Equipment**

- In addition to regular PPE for employees engaged in normal work tasks, MOKA will also provide PPE necessary to prevent the spread of COVID-19 based on exposure risk associated with the specific job or work location. Exposure risk and associated PPE required is subject to change even within the same work location based on current exposure risk factors. At minimum, PPE will include fabric face covers. Supervisors are responsible for communicating specific PPE requirements to employees.



## Workplace Cleaning and Disinfecting

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MOKA has developed increased cleaning practices to prevent the spread of COVID-19. Common areas and frequently touched surfaces are being cleaned and disinfected at least daily. Cleaning supplies will be available and employees are encouraged to clean and disinfect workspaces throughout the workday. Specific practices vary based on work location and exposure risk factors. Supervisors are responsible for communicating specific cleaning and disinfecting requirements with employees.

MOKA will ensure that any disinfection will be conducted using one of the following:

- ✓ Common EPA-registered household disinfectant;
- ✓ Alcohol solution with at least 60% alcohol; or
- ✓ Diluted household bleach solutions (if appropriate for the surface).



## Workplace Exposure Situation

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### Employee Tests Positive for COVID-19

Employees experiencing a fever, symptoms of respiratory illness, such as cough or shortness of breath, sore throat, or body aches should not report to work. Call your supervisor and healthcare provider right away. You will be asked to stay away from work until you are able to receive COVID-19 testing or



receive other direction from your healthcare provider. Please keep your supervisor informed of your testing status. An employee who tests positive for COVID-19 will be directed to self-quarantine away from work until the criteria to discontinue home isolation are met, in consultation with healthcare providers and state or local public health representatives.

### Employee Has Close Contact with an Individual Who Has Tested Positive for COVID-19

Employees who have come into close contact with an individual who has tested positive for COVID-19 should inform their supervisor right away. Close contact is defined as six (6) feet or closer for a prolonged period (more than 10 minutes). Return to work for exposed employees will be based on state or local public health advice and may vary based on work location or service line.

### Notification of Employee Testing Positive in the Workplace

If MOKA learns that an employee has tested positive, an investigation will be conducted to determine co-workers who may have had close contact with the confirmed positive employee in the prior 14 days. Notifications to potentially exposed employees will occur within 24 hours. If applicable, MOKA will also notify individuals served and their family or guardians, sub-contractors, vendors or visitors who may have had close contact with the confirmed positive employee. In these circumstances the number of people 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. All other medical information will be kept confidential as required by law.



## OSHA Recordkeeping

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If a confirmed employee case of COVID-19 is reported, MOKA 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. 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.



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.

If an employee has a confirmed case of COVID-19, MOKA will assess 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.

MOKA’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.

## Confidentiality/Privacy

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Except for circumstances in which MOKA 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. MOKA 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, or visitors that an unnamed employee has been diagnosed with COVID-19 if they might have been exposed to COVID-19 so those individuals may take measures to protect their own health.

## General Questions

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Given the fast-developing nature of the COVID-19 outbreak, MOKA may modify this Plan as needed including modification, adding or deleting of additional documents described below. If you have any questions concerning this Plan, please contact Emily Betz, Director of Programs or Dorothy Bowne, HR Director.

## Additional Documents

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The following documents contain department or job specific protocol related to COVID-19 prevention or exposure and as such are considered part of this Plan. These documents can be found on the MOKA intranet or are available upon request.

- AFC PPE Considerations
- AFC PPE Daily Inventory Check
- Community Activities During State Ordered Restrictions
- Employee Return-to-Work Following COVID-19 Confirmed or Suspected Positive
- Evaluate and Manage Individual with Symptoms of Respiratory Illness
- General Recommendations for Cleaning and Disinfection of Households with People Isolated in Home Care
- In-home Visits During a Pandemic
- Infection Control during Center based ABA Sessions
- Monitoring for COVID-19 Following Exposure
- Office Teams COVID-19 Prevention
- Positive COVID-19: Communication Guide
- Recommended Precautions When in Close Contact with Someone with COVID19 or Under Investigation
- Requirements for Monitoring Following Staff Contact with a Confirmed Case