





# **COVID-19 Preparedness & Response Plan**

## **General**

The following COVID-19 preparedness & response plan has been established for Oakmont Senior Communities 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. Executive Director has read these emergency rules carefully, developed the safeguards appropriate to Oakmont Senior Communities based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

Oakmont Senior Communities 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) is Executive Director or designated representative. The supervisor will remain on-site at all times 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 the website and hard copy..

# **Exposure Determination**

Oakmont Senior Communities 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. Executive Director was responsible for the exposure determination. Oakmont Senior Communities 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.

Executive Director verifies that Oakmont Senior Communities 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.

Oakmont Senior Communities 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)
Administration	Low
Activities	Low
Housekeeping	Low
Dietary	Low
Maintenance	Low

Transportation	Low
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#### **⊘** Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. Executive Director will be responsible for seeing that the correct administrative controls are chosen, implemented and maintained for effectiveness.

The following administrative controls have been established for Oakmont Senior Communities:

(Choose the controls below that are feasible for your workplace. Delete the controls that are not feasible or applicable. Add additional rows for other feasible administrative controls that will be implemented. In the first column, indicate which jobs or tasks will use each administrative control.)

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Job/Task	(For Example, Workplace Distancing, Remote Work, Notifying Customers)	
All employees	Maintain at least six feet from everyone on the worksite.	
	Use ground markings, signs, and physical barriers to	
	prompt employees to remain six feet from others.	
	Promote remote work (telecommuting) to the fullest	
	extent possible.	
	Promote flexible work hours (staggered shifts) to	
	minimize the number of employees in the facility at one	
	time.	
	Establish alternating days or extra shifts to reduce the	
	total number of employees in the facility at a given time.	
	Restrict business-related travel for employees to	
	essential travel only.	
	Restrict face-to-face meetings. Communicate with	
	others through phone, email, teleconferencing, and web	
	conferencing.	
	Restrict the number of customers in the establishment	
	at any given time.	
	Minimize the sharing of tools, equipment, and items.	
	Provide employees with non-medical grade face	

	coverings (cloth face coverings).
	Require employees to wear surgical coverings when
	they cannot consistently maintain six feet of separation
	from other individuals in the workplace.
	Require customers and the public to wear surgical face
	coverings.
	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.
	Provide customers and the public with tissues and trash
	receptacles.
	Encourage proper cough and sneeze etiquette by
	employees, including covering coughs and sneezes and
	coughing and sneezing in one's elbows rather than
	hands.
	Ensure that sick leave policies are flexible and
	consistent with public health guidance, so employees
	do not go to work sick.
	Maintain flexible policies that permit employees to stay
	home to care for a sick family member.
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## **⊘** Hand Hygiene

Executive Director will be 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, Oakmont Senior Communities shall provide employees with antiseptic hand sanitizers or towelettes. Oakmont Senior Communities will provide time for employees to wash hands frequently and to use hand sanitizer.

Oakmont Senior Communities 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

Oakmont Senior Communities 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). Oakmont Senior Communities will make cleaning supplies available to employees upon entry and at the worksite.

Housekeeping Supervisor will be 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, Oakmont Senior Communities 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.

Surface	Method/Disinfectant Used	Schedule/Frequency
Departmental Common Area Touchpoints Touchpoints within a specific department's work area	Spartan HdQC2 "Clean on the Go" (for non-food surfaces) EPA registration number 1839-169-5741 Soap & Water, Water Rinse, and Array Ultimate Sanitizer for food surfaces EPA registration number 10324-81-45133	Up to several times daily as needed in each specific work area to prevent cross-contamination. After each shift- each department disinfects their own area touchpoints.
Public Area Touchpoints Any surfaces touched by residents, staff, and visitors.	Spartan HdQC2 "Clean on the Go" (for non-food surfaces) EPA registration number 1839-169-5741	After activity events, mealtimes, and in the evening before locking the front doors. Hand Sanitizers are placed at each elevator to help prevent contamination between disinfecting.
Transportation Touchpoints	Spartan HdQC2 "Clean on the Go" (for non-food surfaces) EPA registration number 1839-169-5741	After each use

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

Resident Area Touchpoints Includes touchpoints within the resident's room. This would include items such as the resident clothes hangers when used in the laundry department and the outer door handle.	Spartan HdQC2 "Clean on the Go" (for non-food surfaces) EPA registration number 1839-169-5741	Weekly during the routine cleaning Frequency of door handle disinfection would increase during a lock down to each visit. The dining servers would implement the process if one person touching only the food items and the other opening and sanitizing the resident door handles.
Specific Rooms utilized by In- House Outside Services. BHC Salon PT Room	Spartan HdQC2 "Clean on the Go" (for non-food surfaces) EPA registration number 1839-169-5741	The outside service provider is responsible for disinfecting their areas during the work shift. Housekeeping will disinfect area daily after each use.
Common Area Room utilized by Outside Provider.	Spartan HdQC2 "Clean on the Go" (for non-food surfaces) EPA registration number 1839-169-5741	Housekeeping will disinfect touchpoints in the room after each visit.

Oakmont Senior Communities 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.

#### **O** Personal Protective Equipment (PPE)

Oakmont Senior Communities 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.

Oakmont Senior Communities will require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace. Oakmont Senior Communities 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	Face coverings
All	Face shields/goggles (as appropriate)

#### Health Surveillance

Oakmont Senior Communities. 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. Executive Director will be 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, Oakmont Senior Communities will have employees self-screen for COVID-19. Oakmont Senior Communities 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 will be used for temperature screening of employees. Oakmont Senior Communities 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 Executive Director before and during the work shift. Oakmont Senior Communities has provided employees with instructions for how to make such a report to the employer.

Oakmont Senior Communities 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.

Oakmont Senior Communities 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.

Oakmont Senior Communities 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

Executive Director shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

## **Recordkeeping**

Oakmont Senior Communities 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.

Executive Director will ensure that the records are kept.