COVID-19 Agency Response Plan

# Decisions and Risk Assessments

While Developmental Services Inc. and Bona Vista Programs have remained essential services providers within the healthcare arena and have remained open during the COVID-19 pandemic, other internal programs deemed nonessential have changed the nature of their typical operations. Not only did this lead to significant business disruptions, like others, it has critically impacted our service delivery model and bottom line. We continue to discuss operational and service delivery changes based on the changing COVID-19 climate.

Using pieces from Governor Holcomb’s Back on Track Indiana Plan, along with current local county ordinance guidance, DSI and BV’s COVID-19 Agency Response Plan has been updated as of 8-18-21. The agency has successfully reopened and maintained certain components throughout the original plan since the onset of the COVID-19 pandemic. The plan continues to follow the following guidelines:

* **Review guidance from state and local governments**—The COVID-19 pandemic impacts states and regions in different ways. DSI and BV will approach opening/closing within each program based on all relevant state and local orders. Multiple levels around opening/closing protocols are in place to immediately respond to departmental and agency needs.
* **Understand the risks**—DSI and BV have conducted risk assessments through guidance from the Indiana State Department of Health (ISDH), OSHA, state and local agencies, industry associations as well as the local health department. We understand the critical need to consult the expertise of legal, insurance and other professionals throughout COVID-19.
* **Development and execution of agency-wide crisis management plan**- The goal of this plan is intended to protect the entire agency in the case of an emergency or disaster. More specifically, the agency-wide crisis management plan will analyze both internal and external factors of the organization to determine how it will handle specific emergencies, how it will develop specific response plans, create any necessary interim operations, embark upon recovery and property restoration efforts for main building structures, provide crisis recovery assistance for staff members and persons served, and focus on long-range recovery plans. The agency-wide crisis management plan will also include the agency’s media plan, contact procedures and designated spokespersons, and the identification of necessary contractors, vendors and suppliers. Finally, the plan will develop business continuity plans, especially in light of business and billing operations, and network and IT operations.

## Conducting a Risk Assessment

DSI and BV have conducted risk assessments to determine what steps must be taken as part of the initial agency-wide crisis management plan. While the complexity of risk assessments will differ from department to department, they typically involve the following steps:

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* **Identifying the hazards**— When it comes to COVID-19, DSI and BV leadership must think critically about any exposure, particularly if an infected client or staff enters an agency building or home. Being an essential healthcare provider, direct care tasks performed by staff creates a higher risk of exposure to COVID-19 when performing their job duties.
* **Deciding who may be harmed and how** - Evaluating workforce and client exposure risks to COVID-19 is part of this evaluation; we serve a high-risk population.
* **Assessing current policies and procedures**— In order to maintain a healthy working environment, all staff members should remember to follow all health-related policies in DSI and BV’s Safety & Health Policies & Procedures, including all infection control policies, and all Universal Precautions. Staff members should be aware of proper hygiene procedures, such as handwashing, and to remember not to report to work when they are showing symptoms of contagious illnesses or diseases. In cases of a medically related crisis, this will assist in making recovery efforts faster and prevent the spread of viruses in the case of a pandemic.

## Modifying the Workplace

To prevent the spread of COVID-19 after reopening, DSI and BV will continue to make office and program space modifications. These workplace modifications are in response to current COVID-19 suggested precautionary measures provided by the CDC surrounding safety and social distancing protocols.

As part of our plan, the following is in effect until further notice:

1. **Physical workspace modifications**—Because COVID-19 spreads through close contact, we will make necessary changes to employee workstations, client program space and overall floor plans, as needed.
	* Separating desks and workstations to ensure that there are 6 feet between each station;
	* Closing common spaces, including conference rooms, break rooms and cafeterias;
	* Modifying high-touch surfaces (e.g., propping doors open) to avoid unnecessarily touching surfaces;
	* Posting signage around the office to remind employees and persons served of social distancing protocols;
	* Providing additional safety barriers at reception areas;
	* Continuing contactless drop zones for all deliveries including mail, packages, and food;
	* Continuing all visitor and vendor restrictions;
	* All staff are required to wear a mask when they are not isolated in their own office or workspace; and
	* Direct care departments have program specific regulations to be followed during the COVID-19 matter, you will receive more information from Human Resources.

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1. **Agency protocols**—In an effort to keep everyone safe, current precautions and restrictions are to remain in place as follows:
* Encourage the use of virtual meeting platforms
* Limiting the size of in-person gatherings and meetings to 25 or fewer people;
* Employees should avoid sharing workstations or equipment;
* Temperature checking/screening question protocol at each location and in each Community Living and Group Home site;
* Hand sanitizing and handwashing protocols in place at each location and in each Community Living and Group Home site;
* Disinfecting/cleaning protocols; and
* Use of PPE.

Departments and programs may have alternate guidelines that will be followed as we continue to navigate COVID-19 when guidance is distributed by State and Federal agencies. As needed, alternate guidelines have been issued through memo or email communication to staff, families, clients and the Board of Directors, and information will continue to be disbursed in that manner until further notice by Executive Leadership staff. The Human Resources staff will continue to communicate with county leadership and the local Board of Health.

### Employee Schedules—

As part of our COVID-19 response efforts, the following has been initiated:

* + Quarantine teams are identified if the need to isolate within a Group Home or Community Living site is required during COVID-19. Staff will quarantine per CDC and local Board of Health guidelines, in an effort to reduce the spread of COVID-19 in a home that had a person served or staff test positive;
	+ Teleservices remain an option for certain services per the State of Indiana BDDS Appendix K provisions; and
	+ Employees will work remotely, if needed, at any point during COVID-19.

**\*\* *The CEO/President, at any time, can reduce or increase the capacity of services provided based on current COVID-19 numbers and CDC guidance.***

## Disinfecting the Workplace

DSI and BV have maintained a cleaning schedule for every building and residential location. The following is part of current cleaning protocol:

* **Wear proper PPE**— Staff will wear PPE, including gloves and a mask, while cleaning any space. Staff should avoid touching their eyes, face or mouth, or any personal electronic devices, while cleaning.

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* **Clean first, then disinfect**—Disinfectant works best on already clean surfaces. As such, Janitorial staff, or an outside cleaning company, will perform a general cleaning by disinfecting any office or building workspace. Heightened cleaning efforts will give attention to the following areas:
	+ Entryways and exits
	+ High-touch common surfaces (e.g., light switches and plate covers, doors, cabinets, sinks, stair railings, countertops, beverage machines, refrigerators and elevator buttons, if applicable)
	+ Employee workstations
	+ Electronics
	+ Tables, chairs and desks, from the lobby to the conference room
* **Disinfect all spaces with an EPA-registered disinfectant**

## Establishing Employee Screening, Exposure and Confirmed Illness Protocol

Keeping employees safe is a priority and given the contagious nature of COVID-19, Bona Vista Programs

and DSI implemented formalized screening and exposure protocols at the onset of Covid-19. All protocols are currently in place and will remain in place until the Senior Director of Human Resources announces the protocol has been lifted.

Employee Screening Protocols

To keep employees safe, screening procedures were implemented to identify potentially ill employees before they entered the office. DSI and BV require every employee to measure his/her body temperature before remaining at work for the day. Every employee is to document their temperature at each temp checking station, or in the home of the person served on a communication log. Screening questions are also utilized upon start of shift and in place when home visits resume prior to the staff providing any service.

Exposure and Confirmed Illness Protocol

Employees who test positive for COVID-19 should follow home quarantine recommendations from the CDC/Health Department and can return to work when the following conditions have been met.

* 10 days after the onset of symptoms. For those staff who are not symptomatic, they must quarantine for 10 days from the date of the test.
* Or, for a non-vaccinated staff member who is a close contact with someone who tested positive, they must quarantine for 7 days; receive a negative test on day 5, 6, 7 from the date of exposure; must not have any symptoms; if the staff member does not want to secure a test, they must quarantine for 10 days from the last date of exposure and be symptom/fever free before they return to work
* Or, for a vaccinated staff member who is a close contact with someone who tested positive, they do not have to quarantine as long as they do not have any symptoms; they must wear a mask and be tested 3-5 days after the last date of exposure.

DSI and BV will follow the agency communicable disease notification protocol as follows.

* If a client or staff is tested for or diagnosed witha communicable disease, like COVID-19, the Senior Director of Human Resources (in the North) or Terri Cutter (in the South) must be notified immediately

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* + Staff are to contact their supervisor and/or Human Resources to give notification and be given guidance on next steps
* The Senior Director of Human Resources or designee will determine the appropriate response on a case-by-case basis in collaboration with guidance from the local Health Department
* The Senior Director of Human Resources or designee is responsible for appropriate notification to department staff, guardians, and health authorities

When an employee tests positive for COVID-19, deep-cleaning procedures will be initiated immediately. Furthermore, employees or persons served who have been potentially exposed to a DSI/BV employee or person served who has tested positive for COVID-19 will be contacted and instructed by Human Resources to follow board of health quarantine restrictions.

DSI is responsible for providing a safe and healthy workplace. We have assessed and implemented an appropriate combination of control measures to limit the spread of COVID-19, including testing controls, workplace administrative policies, and PPE to protect workers from the identified hazards.

We are implementing testing protocols based on guidance from the CDC. Our approach is fluid and includes, but not limited to the following:

* Requirement for a copy of all test results (testing sites can include at home, medical facility, private or government funded)
* Onsite agency testing of employees or clients will be completed as directed by the Senior Director of Human Resources
* DSI, at this time, is not an open testing center to the public. We will only conduct COVID-19 tests for staff and clients. However, with approval from the Senior Director of Human Resources, we may test others on a “case by case” basis. A variety of factors will be considered, including but not limited to: test supplies, risk of potential exposure and staff availability.
* Possible periodic testing of employees at intermittent intervals, or targeted testing of new employees or those returning from a prolonged absence such as medical leave or furlough, or some combination of approaches.
	+ Leadership will take into account several factors in determining the [interval for periodic testing](https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/testing-non-healthcare-workplaces.html), including availability of testing, results of previous testing, and [level of community transmission](https://www.cdc.gov/coronavirus/2019-ncov/hcp/testing-overview.html).

## Isolation Plan

In an effort to prepare and plan for a positive COVID-19 case within Community Living or Residential Services, established designated agency locations and staffing plans have been developed for a suspected or confirmed COVID-19 case.

If isolation at the individual’s personal residence or group home is unavailable, due to health and safety concerns, additional isolation locations will be identified based on geographical region. The following will be followed per quarantine and isolation protocol:

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* Persons served with known or suspected COVID-19 should be cared for in a single-person (private) room with the door closed;
* Persons served with known or suspected COVID-19 should not share bathrooms or tableware with other roommates or staff;
* All persons served returning from the hospital, or healthcare facility, with confirmed COVID-19 should be cared for in a private room;
* Persons served whom have been in close contact with a confirmed positive COVID-19 patient (e.g., roommate or infected staff without wearing PPE) will be isolated and follow quarantine guidelines outlined by the local health department; and
* The Senior Director of Human Resources or a Senior Vice President will contact the local and Indiana State Department of Health at 877-826-0011 (open 24/7) to determine if rapid response site testing is needed at any time during COVID-19.

## Designated Isolation Room Protocol:

If any person served or staff person become ill and need isolated at an agency administrative location, stations have been identified as isolation rooms until he/she can leave the building. The Community Living and Residential Department management team will follow the protocol listed below:

* Identify a bedroom or bathroom in the home for only the positive COVID-19 person served or staff to use
* Place one large trash can, with a step opening lid, lined with a trash bag in the room for soiled linen and clothing
* Provide a set of vital sign equipment (thermometer, alcohol wipes to wipe earpiece, if needed) and hand sanitizer
	+ This is to remain in the room and only be used for the positive COVID-19 patient
	+ Place equipment in a large plastic Ziploc bag when not in use
* Disinfecting supplies and cleaning supplies for only these rooms, will be placed in bathroom or closet
	+ Follow agency cleaning protocol
	+ Cleaning of the rooms should be done daily, high touch areas such as fixtures, toilet, phones, tablets, tables, door handles, should be cleaned and disinfected
* Use only disposable plates, bowls, cups, eating utensils for the positive COVID-19 individual
	+ Dispose of in the room, do not bring anything out of the room that is not bagged and closed in a trash bag
* Hygiene supplies for the individual: soap, shampoo, toothpaste, deodorant, skin lotion, etc.
	+ If we cannot supply a separate bathroom facility, a portable commode would be provided, in addition to 2 small basins (1 for bed baths, 1 for washing hands, brushing teeth if he/she cannot perform these acts in the bathroom.)

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* Quarantine kits are available and include:
	+ Gloves (4 pair)
	+ Surgical Mask-4
	+ Gown-4
	+ NK95 Mask-4
	+ Shoe Covers-4
	+ Eye Protection-4
	+ Air Mattress
	+ Linens-1 set
	+ Towels/Washcloth-2
	+ Blanket-1

## Creating Employee Safety Training Materials

The success of our agency *Return to Services* plan*,* no matter how well drafted and comprehensive it may be, is largely contingent upon how well employees follow health and safety guidance. Employee safety training materials will cover the following topics.

Social Distancing Guidelines

Employees are asked to follow social distancing best practices throughout all facilities, including but not limited to: person served eating areas, common spaces and office spaces. Specifically, employees are encouraged to:

* Stay 6 feet away from others when working or on breaks
* Avoid job tasks that require face-to-face work with others when possible
	+ If this is unavoidable, employees will be provided face masks, face shields, physical barriers and other workplace controls to ensure their safety
* Avoid contact with others whenever possible (e.g., handshakes)
* Avoid touching surfaces that may have been touched by others when possible
* Distance themselves from anyone who appears to be sick
* Avoid gathering when entering and exiting the facility
	+ Employees should also only enter and exit designated areas
* Follow any posted signage regarding COVID-19 social distancing practices
* Disinfect their workspace often
* Avoid touching their face
* Avoid nonessential gatherings or outings

Use of Personal Protective Equipment (PPE)

Employees and visitors will be required to use PPE while at work or visiting, regardless of department. Employees will be provided with cleaning instructions before and during use of PPE per CDC guidelines.

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* Face masks and eye protection — Every employee will have access to a mask as part of our plan.
	+ Pick up and Drop off protocol in place for early childhood
	+ To align with updated Centers for Disease Control and Prevention (CDC) guidelines, Indiana Department of Health has recommended the use of eye protection as a standard safety measure to protect healthcare personnel (HCP) who provide essential

direct care within 6 feet of the client, especially when doing procedures that lead to sprays and splashes. Each building/residential location has a supply of face masks/shields to be used by staff.

* Travel kits are available and include:
	+ Gloves x2
	+ Sanitizer Wipes-5
	+ Hand Sanitizer
	+ Medical Mask

Personal Hygiene and Etiquette

Agency employee safety training materials will include guidance for employees as it pertains to personal hygiene and etiquette to prevent the spread of COVID-19. Specifically, we will include guidance for the following:

* **Respiratory etiquette and hand hygiene**—Encourage good hygiene to prevent the spread of COVID-19. This can involve:
	+ Placing hand sanitizers in multiple locations to encourage hand hygiene;
	+ Reminding employees to not touch their eyes, nose or mouth; and
	+ Following CDC guidelines.

**Staying home when sick**— Employees are to follow current Covid-19 safety precautions until further notice. If you think you are symptomatic, call your healthcare provider. If you have a fever of 100, do not report to work until you are fever free without fever reducing medication for 24 hours.

Cleaning Responsibilities

Because COVID-19 can remain on surfaces long after they’ve been touched, it is vital that DSI and BV frequently clean and disinfect each building and residential location. All employees are responsible for ensuring that they do their part in workplace cleanliness. Some best practices we have instituted to promote cleanliness include:

* Discouraging workers from using other workers’ phones, desks, offices, or other tools and equipment, when possible
	+ If necessary, clean and disinfect them before and after use
* Providing disposable wipes so that commonly used surfaces can be wiped down by employees before each use
	+ Wipe Down Wednesday protocol instituted
* Usage of electrostatic spray gun, if available, that will be used to disinfect all classrooms, hallways, common areas and other high traffic locations within each building
* Installed touchless temperature scanners at main locations

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# COVID-19 Emergency Response Team

A pandemic response team is a cross-functional team that recommends and oversees agency protocols to reduce the spread of COVID-19. The scope and design of our team will vary depending on your specific business, but it should at least include the following roles:

* The Senior Director of Human Resources is responsible for the overall action plan
	+ The Director of Nursing is responsible for working with company stakeholders and relevant health and safety bodies to manage this action plan
* **COVID-19 prevention and protocols lead**—The Senior Director of Human Resources is responsible for recommending and developing protocols to ensure the wellness of all employees. They are also tasked with overseeing procedures for isolating employees should they become sick at work.
* **Sanitization and disinfection lead**— Safety Coordinators will manage logistics related to daily and periodic sanitation and disinfection efforts. Their responsibilities include ensuring that routine cleanings are completed and that the necessary cleaning supplies are readily available.
* **Communication lead**— The Senior Director of Human Resources is tasked with managing any and all pandemic- related communications. He/she will work with internal communication stakeholders to ensure COVID-19 training is completed and that employees and their managers understand their role in preventing the spread of the disease. We will communicate updates on a bi-weekly basis.

**Employees**—Employees play a critical role in COVID-19 prevention efforts. In an effort to stop the spread of COVID-19, employees and clients should follow the following guidance:

* **Understand the signs and symptoms of COVID-19, and stay home if you are feeling sick**—Any employee who is experiencing symptoms of COVID-19 (e.g., fever, cough, shortness of breath, sore throat, runny nose, body aches, chills and/or fatigue) should stay home. Employees should contact their medical care provider for guidance.
	+ **Practice good hygiene**—Employees should clean their hands often, either with an alcohol-based hand sanitizer or soap and water. Hand sanitizers should contain at least 60%-95% alcohol, and employees should wash their hands with soap for at least 20 seconds. In addition, employees should avoid touching their face and cough into their arm.
	+ **Practice social distancing**—Social distancing is the practice of deliberately increasing the physical space between people to avoid spreading illness. Current CDC guidance is to remain at least 6 feet from another individual.

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## Reviewing Personnel Policies

DSI and BV reserve the right under this *Return to Services* plan to make exceptions to agency policies when an emergency or crisis becomes severe enough to warrant such action. Any exceptions made to agency policies under this *Return to Services p*lan will be distributed by memo. The CEO/President will have the ability to determine when such policy exceptions shall begin and when these exceptions shall end, as dictated by the emergency or crisis at hand. Once an exception to an agency policy has ended, the agency policy, as previously written, will remain in full force and effect, unless it is revised through other avenues.

## Agency Next Steps

DSI and Bona Vista are currently operating within standard procedures and practices. At any time, the CEO/President can reduce or increase the speed at which we remain open or close programming based on the health and safety of persons served, staff and community partners. Each program area will continue to implement individually specific plans within each phase until further notice.

Definitions:

* Executive Leadership: CEO, Senior Vice President or Senior Director of Human Resources;
* Administrative Staff: Senior Leadership, Senior Directors, Regional Program Directors, and Coordinators;
* Agency Personnel: Clerical Staff, QIDP’s, Home Visitors, Employment Specialists, Direct Care Staff, Teachers, Therapists, Department Staff (Business Office, Human Resources, Development, IT), Maintenance and Janitorial staff;
* Personal Protective Equipment – PPE; and
* Vendor – Any individual or agency personnel who visits, performs work at, or otherwise enters a building or property owned or operated by DSI and BV.

### Agency protocols remain in place as follows until further notice:

* + Use of virtual meeting platforms instead of in-person meetings if possible
	+ Visitation is currently allowable with outdoor visitation highly encouraged for all essential team members with the following precautionary measures in place:
		- Individuals shall:
			* Participate in and pass a symptom screening and temperature check each time they arrive;
			* Sign-in and answer current COVID-19 status and symptom screening questions;
			* Complete a daily log form showing name, contact information and start/end time of visit;

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* + - * Wash their hands or utilize hand sanitizer upon arrival;
			* Wear a mask, provided by themselves, at all times while visiting;
			* Maintain at least six (6) feet of distance from all persons served and staff; and
			* Refrain from bringing any visitors.
		- DSI and Bona Vista employees shall:
			* Ensure clients wear a mask when essential team members are present;
			* Ensure individuals comply with above requirements;
			* Disinfect areas used after each visit; and
			* Identify and set up designated areas that will be utilized for visitation with appropriate PPE and social distancing spaces
	+ Limiting the size of in-person gatherings

o Employees should wear masks and physically distance during all in-person gatherings

* + Employees should avoid sharing workstations or equipment
	+ Temperature checking/screening question protocol at each location, used by staff that serve any child or adult, family or client using in home services, as well as each Community Living and Group Home site
	+ Hand sanitizing and handwashing protocol in place at each location, upon entrance, and in each Community Living and Group Home site
	+ Disinfecting/cleaning protocol completed daily
	+ Use of PPE daily
		- Face Masks:
			* Every employee is required to wear a mask while working a direct care shift within any program
			* Every employee is required to wear a mask while transporting cliens
			* All non-direct care staff are required to wear a mask if they are not isolated in a personal workspace
		- Eye Protection:
			* Every employee that provides essential direct care within 6 feet of a client, especially when doing procedures that lead to sprays and splashes, is required to wear eye protection.

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