The Occupational Safety and Health Administration (OSHA) published requirements in the Federal Register on June 17, 2021 related to COVID-19 workplace safety. This new guideline is intended for "healthcare settings where people with suspected or confirmed COVID-19 are reasonably expected to be present" and is considered an Emergency Temporary Standard (ETS) that is currently scheduled to end in six months unless otherwise extended.

While these rules do not substantially change existing standards related to COVID-19, CVA wishes to clearly outline our responsibilities under the new OSHA standards. These standards apply to specific settings in which employees provide health care services or health care support services, such as home health and serve as a guide for employee safety in the workplace. However, they do not replace our current Coronavirus Pandemic Protocols or our COVID-19 Pandemic Response Plan which provide greater detail to guide employees. Additionally, it is important to recognize that the OSHA guidelines support the Centers for Disease Control (CDC) recommended protocols relative to COVID-19 for healthcare workers and CVA will continue to follow such protocols.

The OSHA standards require that CVA document our specific protocols by service type for which CVA has employees providing services. But First, here are the standards for all CVA employees and applicable locations:

Training: CVA will provide all employees with training on COVID-19 transmission, tasks and situations in the workplace that could result in infection, and how to access relevant policies and procedures.

Reporting to Employer: All employees must report a positive test for, exposure to, or symptoms of, COVID-19 as soon as possible to their supervisor or on-call personnel.

Reporting to Employees: If an individual in services, or an employee, tests positive for COVID-19, CVA will notify all employees in the program and include specific dates and times in which potential exposure could have occurred.

Screening: All CVA employees, and visitors, shall be screened at all CVA locations for exposure to, or symptoms of, COVID-19.

Physical Distancing: Physical distancing of at least six feet is recommended to be utilized as feasible. However, in many cases, direct program services require employees to be closer to individuals served and other employees to provide necessary supports.

Personal Protective Equipment (PPE): CVA will provide employees all necessary PPE. Employees will also receive training, at least annually, on proper use of PPE. Differing situations will require varying uses of PPE and shall follow guidelines by the

CDC and CVA protocols. Proper use of PPE nearly eliminates the risks associated with contracting COVID-19.

Sanitation and Hygiene Practices: Proper sanitation and hygiene practices, specific to the direct service and level of personal care provided, must be followed at all times to prevent the spread of disease. Necessary sanitation and hygiene products will be made available at all locations.

Testing: CVA will either administer COVID-19 tests for employees or provide information to them on where they can get tested.

Infection: If an employee becomes infected they will be eligible for up to 80 hours of paid leave to recover from the infection. However, CVA reserves the right to request employees continue to work, or return to work prior to all criteria being met, if necessary, to mitigate staffing shortages.

Vaccination: CVA recommends that all employees, and individuals served, get vaccinated for COVID-19 but realizes it's a personal decision. However, CVA will allow employees reasonable paid time away from work, if necessary, to obtain a vaccine and recover from any side effects.

Fully Vaccinated Employees: A person is fully vaccinated fourteen days following the last dose of an FDA approved COVID-19 vaccine. "Fully vaccinated employees are exempt from masking, distancing, and barrier requirements when in well-defined areas where there is no reasonable expectation that any person with suspected or confirmed COVID-19 will be present." CVA interprets this exemption to only apply when all people present have been vaccinated. Furthermore, employees wishing to utilize this exemption at CVA must provide written proof of being fully vaccinated to Human Resources.

No Retaliation: CVA will not discriminate against any employee exercising their rights under this ETS.

Ventilation: The ETS recommends that all HVAC systems utilize a MERV 13 or higher rated filter. All air filters in CVA owned programs will be of a MERV 13 or higher rating, as long as they are compatible with the HVAC systems. Program locations not owned by CVA will be encouraged to also use the MERV 13 or higher filters as well. If MERV 13 or higher filters are not compatible wit the HVAC systems, then the highest compatible filtering efficiency for HVAC systems. Additionally, it is important to note that CVA has already installed Ionizer air filtration systems in properties owned by the organization and high-risk program locations not owned by the organization.

COVID-19 Safety Coordinators For CVA:

Organizational Safety Coordinators are Iris Mills and Susan Rigdon, Community Registered Nurses (CRN's)

Reporting to OSHA: CVA will report any work-related COVID-19 fatality or in-patient hospitalization as set forth in the ETS.

Program Specific Guidance:

Individualized Support Living (ISL) Programs

All staff and visitors shall be screened for symptoms of COVID-19 prior to working and must self-report a positive test for, diagnosis of, or exposure to, COVID-19 to their supervisor or on-call personnel.

All staff must follow the hygiene, sanitation, and PPE practices as outlined in the CVA Coronavirus Pandemic Protocol, relative to the current "phase" CVA is in. However, additional protocols will be implemented based on whether or not an individual in services has tested positive for COVID-19 and/or an employee who works in the program has tested positive. In such cases, one of the Community Registered Nurses shall be contacted to determine the best course of action for treatment and disease prevention, relative to the most current CDC standards.

Employment Services

Employment services will not be provided to an individual that has tested positive for COVID-19 or is otherwise symptomatic. Employees working in this program must self-report a positive test for, exposure to, or symptoms of COVID-19 to their immediate supervisor or on-call personnel immediately. Individuals supported in this program, and/or their guardian, will be asked to self-report report a positive test for, exposure to, or symptoms of, COVID-19 immediately to program leadership. All staff must follow the hygiene, sanitation, and PPE practices as outlined in the CVA Coronavirus Pandemic Protocol, relative to the current "phase" CVA is in.

Community Integration

Community Integration services will not be provided to an individual that has tested positive for COVID-19, is otherwise symptomatic, or has been exposed. Employees working in this program must self-report a positive test for, exposure to, or symptoms of COVID-19 to their immediate supervisor or on-call personnel immediately. Individuals supported in this program, and/or their guardian, will be asked to self-report a positive test for, exposure to, or symptoms of, COVID-19 immediately to program leadership. All staff must follow the hygiene, sanitation, and PPE practices as outlined in the CVA Coronavirus Pandemic Protocol, relative to the current "phase" CVA is in.

In Home Supports and Personal Assistant Services

In most cases, in home and personal assistant services will not be provided to an individual that has tested positive for COVID-19, is otherwise symptomatic, or has been exposed. Only emergency services (such as medication or medical) are allowed in such scenarios and must be approved by Program leadership. If emergency services are approved, one of the Community Registered Nurses shall be contacted to determine

the best course of action for treatment and disease prevention relative to the most current CDC standards. Employees working in this program must self-report a positive test for, exposure to, or symptoms of COVID-19 to their immediate supervisor or on-call personnel immediately. Individuals supported in this program, and/or their guardian, will be asked to self-report a positive test for, exposure to, or symptoms of, COVID-19 immediately to program leadership. All staff must follow the hygiene, sanitation, and PPE practices as outlined in the CVA Coronavirus Pandemic Protocol, relative to the current "phase" CVA is in.

Host Homes

This OSHA rule applies to CVA employees visiting Host Homes but does not apply to Host Home families as they are Independent Contractors. However, Host Homes shall be asked to self-report a positive test for, exposure to, or symptoms of COVID-19 for anyone living in the home and/or present during the scheduled visit. Employees working in this program must self-report a positive test for, exposure to, or symptoms of COVID-19 to their immediate supervisor or on-call personnel immediately. All staff must follow the hygiene, sanitation, and PPE practices as outlined in the CVA Coronavirus Pandemic Protocol, relative to the current "phase" CVA is in. While CVA personnel will provide advice and support, they will not physically enter a Host Home location that has recently had a high-risk exposure to, positive test for, or is otherwise symptomatic for, COVID-19 unless there is a need for emergency services. However, any Emergency services must be approved in advance by program leadership. If emergency services are approved, one of the Community Registered Nurses shall be contacted to determine the best course of action for treatment and disease prevention relative to the most current CDC standards.

These OSHA standards are purely designed as a guide for employees and employers for the safety of all as it relates to COVID-19. Furthermore, this document supports but does not supplant any other guidance CVA has provided for the safety of all relative to COVID-19.