

**HEALTH CARE ASSOCIATES, COMMUNITY CARE GIVERS,
HCAT AND HARBOR CARE ASSOCIATES
COVID-19 PREPAREDNESS AND RESPONSE PLAN**

I. Introduction

HCA, CCG, HCAT and Harbor Care, (“Company”) introduces these workplace guidelines as part of its ongoing response to the COVID-19 pandemic. Company takes seriously the safety of its employees and community and implements this policy to promote the health of each. Managers and employees are responsible for knowing the contents of this plan and should practice each guideline in their day to day activities. Our goal is to reduce the risk of transmission and mitigate the risk of the COVID-19 virus, and cooperative effort best positions us to accomplish this goal.

Company will monitor the continuously evolving public health guidelines issued by local, state, and federal health authorities, and may amend this policy accordingly.

Company further designates department managers as a worksite supervisor(s). The worksite supervisor will remain on premises when any employees are on site. The worksite supervisor will ensure implementation of these policies, monitor the implementation and workplace conditions, and will report to management on the implementation of this policy and workplace conditions.

Company will record: the results of screening procedures outlined in this policy; training offered to employees under this policy; and reports furnished to local health authorities regarding confirmed COVID-19 infections.

II. About COVID-19

According to the Centers for Disease Control and Prevention (“CDC”), COVID-19 is a virus that is spread person to person. The CDC notes the virus mainly spreads through respiratory droplets produced by infected persons, but that it may also spread through objects contaminated by respiratory droplets of infected persons.

According to the CDC symptoms of COVID-19 may appear 2-14 days after exposure to the virus. Symptoms include fever, cough, shortness of breath, repeated chills with shaking, muscle pain, headache, sore throat, and loss of taste and smell. The CDC warns that certain individuals are at heightened risk of severe illness. These individuals include those 65 and older, and individuals of any age with chronic lung disease, asthma, serious heart conditions, a body mass index over 40, diabetes, chronic liver disease, and immune compromised individuals.

III. On-Site Employees

Generally

During the COVID-19 pandemic Company will reduce the number of individuals on worksite locations to the greatest extent possible. Those employees feasibly able to complete their work from home must do so. Additionally, critical infrastructure workers and employees essential to the basic operations of the Company may work on-site. Company encourages employee to work at home as set up to work in office, to maintain the same schedule.

Critical Infrastructure Workers

Critical infrastructure workers include those who interact with clients and field staff on daily basis. Because Company operates 24/7 for home health care, certain Company employees are critical infrastructure workers.

Basic Operations

These are workers whose presence is strictly necessary to allow the business to maintain the value of home health care is not compromised, ensure site security, process transactions, and facilitate the telework of other employees. Company employees who perform these tasks are necessary to the basic operations of Company and may be required to perform in-person duties.

IV. Workplace Hygiene

Workplace Screening

Company will implement screening procedures to detect potential COVID-19 cases. No person may enter a company facility without submitting to the screening procedure. This policy includes all individuals seeking access to a Company facility. Company will physically restrict access to entrances other than those with a screening checkpoint to the extent possible without limiting emergency exits. The screening procedure will at a minimum: evaluate symptoms and ask about any potential exposure to individuals with confirmed COVID-19 cases. Information learned during the screening will remain confidential and will not be placed in employee personnel records.

Safe Work and Personal Hygiene Practices

Personal hygiene is a critical element in preventing the transmission of COVID-19. Therefore, employees working on site must adopt the following personal practices to prevent the spread of COVID-19:

- Frequent and thorough handwashing. Employees should wash their hands with soap and water, thoroughly scrubbing for at least 20 seconds. At a minimum,

employees should wash their hands at the start of each shift, before and after meals, and after using the restroom.

- Where frequent handwashing is not practicable, employees should use hand sanitizing gel or rubs. The alcohol content of these products should be at least 60%.
- Practice respiratory etiquette. Coughs and sneezes should be covered, preferably by coughing or sneezing into an elbow and not into the hands. Employees should thoroughly wash their hands after coughing or sneezing.
- Avoid touching objects used by others, such as phones, tools, workspaces, or desks. Where the sharing of objects is necessary, employees should disinfect the shared object.
- For company vehicles, Company will provide supplies necessary to disinfect vehicles. Employees should disinfect vehicles before and after the employee's shift. Employees should be careful to disinfect commonly touched areas such as door handles, keys, gear shifters, instrument panels, seat belts mechanisms, steering wheels.
- Avoid touching the face to the greatest extent possible.
- Clean and disinfect workstations using disposable towels.
- Masks must be worn when employees cannot consistently maintain six feet of separation from other individuals in the workplace, including but not limited to in common areas, hallways and restrooms. Individuals requiring religious or medical accommodations should contact Human Resources.
- Wear a cloth face masks that fits snugly on the face, covering the mouth and nose. The CDC and state of Michigan recommend that non-healthcare workers avoid using medical grade masks, in order to ensure healthcare facilities are able to obtain these devices.
- N-95 masks will be provided and worn when instructed by management.
- Face masks should be removed carefully and laundered frequently. Employees should thoroughly wash their hands after touching a face mask.

Social Distancing Practices

Company employees should adopt the following social distancing practices to prevent the spread of COVID-19:

- Keep a distance of at least 6 feet from other employees and individuals.
 - This includes sitting apart from one another in rest areas, near time clocks, and designated smoking areas.
- Clients and third-party representatives should not visit Company sites if not strictly required.
- Interaction with outside vendors such as shipping partners should be limited and conducted with appropriate distance.
- Video or telephone communications should be used for meetings.

- Employees should stagger breaks and lunches to minimize the number of employees in rest areas at any given time.
- Employees should not carpool to the workplace unless they are a part of the same household.

Engineering and Environmental Controls

Company enacts the following environmental controls to prevent the transmission of COVID-19:

- Where possible Company will install physical barriers between workstations that cannot be moved more than six feet apart.
- Where possible Company will install physical barriers at point of service between customers and employees, such as reception.
- Company will supply any necessary personal protective equipment and hand sanitizing products. This includes face masks or shields, gloves, hand sanitizer, and other PPE ordinarily required at Company. Company will make cleaning supplies available to employees upon entry and at the worksite and provide time for employees to wash hands frequently or to use hand sanitizer.
- Non-disposable PPE such as face shields will be designated to specific employees to prevent the sharing of PPE.
- Company will increase the frequency and thoroughness of workplace sanitation. In particular in common areas, and commonly touched objects such as door handles, faucets, equipment control panels, phones, railings, and other high touch surfaces.
- Office employees will have access to supplies to clean their workspaces at least twice per day.
- Company will install visible markings to illustrate six-foot spacings in areas of congregation. This may include marking rest areas, the area around time clocks, and designated smoking areas.
- Provision of no touch waste disposal bins.
- Comply with OSHA regulations that would otherwise apply to Company.

Company Administrative Controls

Company enacts the following administrative guidelines to minimize the transmission risk of COVID-19:

- Employees able to telework all or part of the time must do so with direction from supervisor.
- Shift times and workweek length may be adjusted in order to reduce the number of employees present in Company facilities.
- Company requires employees who are sick or are experiencing symptoms of COVID-19 to stay home. Employees must remain home until meeting a return criterion listed below.

- Company requires any employee who is not in a critical infrastructure position to stay home if they meet the self-isolation criteria outlined by the CDC. Employees should remain home when:
 - An employee experiences close contact with a person experiencing COVID-19. Close contact is a spending 15 minutes or more within 6 feet of another.
 - An employee provides direct care to a person with COVID-19.
 - An employee has direct physical contact with a person with COVID-19, such as kissing or hugging.
 - A person with COVID-19 coughs or sneezes on an employee.
- An employee meeting a self-isolation criterion should remain home. The employee may return after 14 days or current CDC return to work guidelines, in self-isolation without experiencing symptoms .
- Employee travel is suspended unless essential.
- Company will monitor the guidelines issued by public health authorities and amend this policy as necessary to promote public health.
- Company will provide up to date education on hygiene in the workplace as well as:
 - Routes by which the virus causing COVID-19 is transmitted from person to person.
 - Distance that the virus can travel in the air, as well as the time it remains viable in the air and on environmental surfaces.
 - Symptoms of COVID-19.
 - Steps employees must take to notify Company of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
 - Measures that the facility is taking to prevent worker exposure to the virus.
 - Rules employees must follow in order to prevent exposure to and spread of the virus.
 - The use of any necessary personal protective equipment, including the proper steps for putting it on and taking it off.
 - The proper reporting protocol outlined by this policy.
 - How to report unsafe working conditions.

V. Managing Illness.

Leave under COVID pandemic

- The Emergency Paid Sick Leave Act was opted out by Company due to health care worker clause.
- The Company may have agreement with employee when criteria is met for COVID related leave.

Responding to Illness

- Employees should self-monitor for symptoms of illness and remain home if experiencing any symptoms. If an employee develops symptoms while in the workplace, the employee should immediately leave the workplace.
- Employees who become sick or believe they are sick should follow the recommendations of the CDC.
- Employees should inform Company if they test positive for or are suspected of carrying COVID-19, and Company will keep this notification confidential. However, Company will notify the local public health agency as required by law.
 - Company will maintain a central log of all symptomatic cases, and of all positive COVID-19 cases in the workplace.
- Company will deep clean the workspace of any employee who tests positive or is suspected of carrying COVID-19.
- Company will inform other employees that may have been exposed to the sick employee without identifying the sick employee. Those employees will be sent home and instructed to self-quarantine, unless they are critical infrastructure workers. Critical infrastructure workers will be instructed to abide by CDC guidelines, including, but not limited to health screening and wearing a mask at all times in the workplace.
- Because COVID-19 is a reportable illness, Company will inform OSHA if any employees test positive for COVID-19 where objective evidence, which is reasonably available to Company, demonstrates the employee contracted the illness in the workplace.
- Employees that must care for COVID-19 infected individual should stay home to reduce the risk of transmission.
- Company will conduct a daily entry screening protocol for workers, contractors, suppliers, and any other individuals entering the facility, including a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19, together with temperature screening as soon as no-touch thermometers can be obtained.

Returning to Work After Sickness

Decisions about allowing a recovered employee will be made on a case by case basis, taking into account the present health needs of the workplace. At a minimum, a recovered employee must meet one of two CDC guidelines before returning to on-site work:

Symptom Based Return: The CDC no longer recommends test-based screening to determine whether an employee with COVID-19 can come to work. The CDC

recommends that employees return to work once the employee meets the criteria to discontinue home isolation. This means:

- For Employees with COVID-19 and symptoms, an employee may return after ten days have passed since symptom onset, 24 hours have passed since resolution of fever without fever reducing medication, and other symptoms have improved.
- For employees with COVID-19 without symptoms, employees may return after ten days of receiving the positive test.
- Upon returning to work, recovered employees should be particularly mindful of personal hygiene and social distancing practices. A recovered employee should wear a face mask at all times and should self-monitor for symptoms.

VI. Employee Practices at Home

Company encourages employees to adhere to the following guidelines when not at the work site. At home personal hygiene is an important factor in reducing the workplace risk of COVID-19.

- Employees should follow the same personal hygiene and social distancing guidelines as outlined in this policy.
- Employees should limit trips outside of the home to only those necessary, such as obtaining food, medical care, or automotive repair. The number of household members participating in these activities should be limited to the fewest number possible.
- Employees should refrain from leaving the home for nonessential purposes.
- Employees engaging in recreation should do so in a manner that maintains at least six feet from others.
- Employees should utilize home delivery or curbside pick-up where possible.
- Employees should use personal protective equipment and hand sanitizer on public transportation.
- Employees should generally keep themselves apprised of current individual health guidelines. Employees should periodically review the CDC guidelines for responding to an illness and follow these instructions when experiencing COVID-19.
- Link to CDC Guidelines: <https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/index.html>

VII. Antidiscrimination

Company employees remain fully protected by applicable antidiscrimination and anti-retaliation laws.

VIII. Communications

Company will continue to monitor public health guidelines and may amend this policy as required. Employees should direct questions regarding this policy to Human

Resources. Employees with concerns about workplace safety or conditions should contact Human Resources.

I, _____ (employee name), acknowledge that on _____ (date), I received a copy of Company's COVID-19 Preparedness and Response Plan ("Policy") and that I read it, understood it, and agree to comply with it. I understand that Company has the maximum discretion permitted by law to interpret, administer, change, modify, or delete the rules, regulations, procedures, and benefits contained in the Policy at any time with or without notice. No statement or representation by a supervisor or manager or any other employee, whether oral or written, can supplement or modify the Policy, unless approved in writing by [employee with authority to modify]. I also understand that any delay or failure by Company to enforce any rule, regulation, or procedure contained in the Policy will not constitute a waiver of Company's right to do so in the future.

Signature

Date