

TRIO Healthcare's COVID-19 Plan

1. Purpose and Scope

Trio Healthcare Consulting, LLC, Trio Healthcare Administration, LLC, and Trio Corporate, Inc. (hereinafter referred to as TRIO) is committed to providing a safe and healthy workplace for all our employees. TRIO has developed the following COVID-19 plan, which includes policies and procedures to minimize the risk of transmission of COVID-19, in accordance with OSHA's COVID-19 Emergency Temporary Standard (ETS).

TRIO has multiple workplaces that are substantially similar, and therefore has developed a single COVID-19 plan for the substantially similar workplaces.

Facility Location (Virginia)		Facility Location (Ohio)
Alleghany Health and Rehab 1725 Main Street Clifton Forge, VA 24422		Beavercreek Health and Rehab 3854 Park Overlook Drive Beavercreek, OH 45431
Bayside of Poquoson Health and Rehab 1 Vantage Drive Poquoson, VA 23662		Bellbrook Health and Rehab 1957 N. Lakeman Drive Bellbrook, OH 45305
Elizabeth Adam Crump Health and Rehab 3600 Mountain Road Glen Allen, VA 23060		Centerville Health and Rehab 7300 McEwen Road Dayton, OH 45459
Elizabeth House Assisted Living 3590 Mountain Road Glen Allen, VA 23060		Centerville Place Assisted Living 7300 McEwen Road Dayton, OH 45459
Fredericksburg Health and Rehab 3900 Plank Road Fredericksburg, VA 22407		Englewood Health and Rehab 425 Lauricella Court Englewood, OH 45322
Fredericksburg Assisted Living 3902 Plank Road Fredericksburg, VA 22407		Jamestown Place Health and Rehab 4960 US Route 35 East Jamestown, OH 45335
Galax Health and Rehab 836 Glendale Road Galax, VA 24333		Portsmouth Health and Rehab 727 Eighth Street Portsmouth, OH 45662
Martinsville Health and Rehab 1607 Spruce Street Ext Martinsville, VA 24112		Xenia Health and Rehab 126 Wilson Drive Xenia, OH 45385
Portsmouth Health and Rehab 900 London Blvd Portsmouth, VA 23704		
Rose Hill Health and Rehab 110 Chalmers Court Berryville, VA 22611		
Shenandoah Valley Health and Rehab 3737 Catalpa Avenue		

Facility Location (Virginia)		Facility Location (Ohio)
Buena Vista, VA 24416		

2. Roles and Responsibilities

TRIO's goal is to prevent the transmission of COVID-19 in the workplace(s). Managers as well as non-managerial employees and their representatives are all responsible for supporting, complying with, and providing recommendations to further improve this COVID-19 plan.

The COVID-19 Safety Coordinator(s), listed below, implements and monitors this COVID-19 plan. The COVID-19 Safety Coordinator(s) has TRIO's full support in implementing and monitoring this COVID-19 plan, and has authority to ensure compliance with all aspects of this plan.

TRIO and the COVID-19 Safety Coordinator(s) will work cooperatively with non-managerial employees and their representatives to conduct a workplace-specific hazard assessment and in the development, implementation, and updating of this COVID-19 plan.

Employee suggestions or concerns may be directed to Compliance via the QAPI committee, Compliance Hotline (844-587-1659, or directly emailing the Compliance Officer.

Title/Facility Location	Contact Information (phone)
LNHA/Alleghany	540-862-5791
LNHA/Bayside	757-868-9960
LNHA/EA Crump	804-672-8725
LALFA/ Elizabeth House	804-672-7580
LNHA/ Fredericksburg	540 786 8351
LALFA/Fredericksburg ALF	540-786-5589
LNHA/Galax	276-236-9991
LNHA/Martinsville	276-632-7146
LNHA/Portsmouth VA	757-393-6864
LNHA/Rose Hill	540-955-9995
LNHA/Shenandoah Valley	540-261-7444
LNHA/Beavercreek	937-429-9655
LNHA/Bellbrook	937-848-7800
LNHA/Centerville	937-433-3441
LALHA/Centerville ALF	937-433-3441
LNHA/Englewood	937-836-5143
LNHA/Jamestown	937-675-3311
LNHA/Portsmouth	740-354-8150
LNHA/Xenia	937-376-2121

3. Hazard Assessment and Worker Protections

TRIO will conduct a workplace-specific hazard assessment of its workplace(s) to determine potential workplace hazards related to COVID-19. A hazard assessment will be conducted initially and whenever changes at the workplace create a new potential risk of employee exposure to COVID-19 (e.g., new work activities at the workplace).

TRIO and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to conduct the workplace-specific hazard assessment. All completed hazard assessment forms and

results will be attached to this plan and will be accessible to all employees and their representatives at each facility.

TRIO will address the hazards identified by the assessment, and include policies and procedures to minimize the risk of transmission of COVID-19 for each employee. These policies and procedures are as follows:

Patient Screening and Management

In settings where direct patient care is provided, TRIO will:

- Limit and monitor points of entry to the setting;
- Screen and triage all employees, residents, vendors, visitors, and other non-employees entering the setting for symptoms of COVID-19;
- Implement other applicable patient management strategies in accordance with the CDC's "[COVID-19 Infection Prevention and Control Recommendations](#)"; and
- Encourage the use of telehealth services where available and appropriate in order to limit the number of people entering the workplace.

TRIO will designate and utilize one main entry to each work place. Each individual entering will have their temperature taken and attest to not having COVID-19 symptoms. Facilities will also limit visitors to only those essential for the resident's physical or emotional well-being and care and restrict visitors to designated areas per CMS and CDC guidance.

Standard and Transmission-Based Precautions

TRIO will develop and implement policies and procedures to adhere to Standard and Transmission-Based Precautions in accordance with CDC's "[Guidelines for Isolation Precautions.](#)"

TRIO and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to develop and implement these policies and procedures

Personal Protective Equipment (PPE)

TRIO will provide, and ensure that employees wear, facemasks or a higher level of respiratory protection. Facemasks must be worn by employees over the nose and mouth when indoors and when occupying a vehicle with another person for work purposes. Policies and procedures for facemasks will be implemented, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach.

Facemasks provided by TRIO will be FDA-cleared, authorized by an FDA Emergency Use Authorization, or otherwise offered or distributed as described in an FDA enforcement policy. TRIO will provide employees with a sufficient number of facemasks, which must be changed at least once a day, whenever they are soiled or damaged, and more frequently as necessary (e.g., patient care reasons). TRIO may also provide a respirator to employees when only a facemask is required (i.e., when a respirator is not otherwise required by OSHA's COVID-19 ETS) and, when doing so, will comply with OSHA's COVID-19 ETS mini respiratory protection program (29 CFR 1910.504). , in such cases, will comply with OSHA's COVID-19 ETS mini respiratory protection program (29 CFR 1910.504). Additional information about when respirator use is required can be found below.

PPE will be distributed at designated stations throughout the workplace. CDC guidance will be followed regarding when and how to don and doff PPE

Paragraph (a)(4) of the ETS exempts fully vaccinated employees from the PPE requirements of the ETS when in well-defined areas where there is no reasonable expectation that any person with suspected or confirmed COVID-19 will be present However, TRIO will follow the most stringent guidance provided by other regulatory entities.(CMS, CDC, etc.)

The following are additional exceptions to TRIO's requirements for facemasks:

1. When an employee is alone in a room outside of patient care areas.
2. While an employee is eating and drinking at the workplace, provided each employee is at least 6 feet away from any other person, or separated from other people by a physical barrier.
3. When employees are wearing respirators in accordance with 29 CFR 1910.134 or paragraph (f) of OSHA's COVID-19 ETS.
4. When it is important to see a person's mouth (e.g., communicating with an individual who is deaf or hard of hearing) and the conditions do not permit a facemask that is constructed of clear plastic (or includes a clear plastic window). When this is the case, TRIO will ensure that each employee wears an alternative, such as a face shield, if the conditions permit.
5. When employees cannot wear facemasks due to a medical necessity, medical condition, or disability as defined in the Americans with Disabilities Act (42 USC 12101 et seq.), or due to religious belief. Exceptions will be provided for a narrow subset of persons with a disability who cannot wear a facemask or cannot safely wear a facemask, because of the disability, as defined with the Americans with Disability Act (42 USC 12101 et seq.), including a person who cannot independently remove the facemask. The remaining portion of the subset who cannot wear a facemask may be exempted on a case-by-case basis as required by the Americans with Disability Act and other applicable laws. TRIO will provide accommodations for religious beliefs consistent with Title VII of the Civil Rights Act. When an exception applies, TRIO will offer a modified position outside of patient care areas, if available, to lower the risk of COVID-19 transmission to all parties.
6. When TRIO has demonstrated that the use of a facemask presents a hazard to an employee of serious injury or death (e.g., arc flash, heat stress, interfering with the safe operation of equipment) When this is the case, TRIO will ensure that each employee wears an alternative, such as a face shield, if the conditions permit. Any employee not wearing a facemask must remain at least 6 feet away from all other people unless the employer can demonstrate it is not feasible. The employee must resume wearing a facemask when not engaged in the activity where the facemask presents a hazard.

If a face shield is required to comply with OSHA's COVID-19 ETS or TRIO otherwise requires use of a face shield, TRIO will ensure that face shields are cleaned at least daily and are not damaged.

TRIO will not prevent any employee from voluntarily wearing their a facemask and/or face shield in situations when they are not required unless doing so would create a hazard of serious injury or death, such as interfering with the safe operation of equipment.

In addition to providing, and ensuring employees wear facemasks, TRIO will provide protective clothing and equipment (e.g., respirators, gloves, gowns, goggles, face shields) to each employee in accordance with Standard and Transmission-Based Precautions in healthcare settings in accordance with CDC's "[Guidelines for Isolation Precautions](#)," and ensure that the protective clothing and equipment is used in accordance with OSHA's PPE standards (29 CFR 1910 subpart I).

TRIO will provide PPE at designated PPE stations throughout the workplace. PPE supplied will be in accordance with the CDC and Lippincott's guidance on Standard and Transmission-Based Precautions.

For employees with exposure to people with suspected or confirmed COVID-19, TRIO will provide respirators and other PPE, including gloves, an isolation gown or protective clothing, and eye protection. TRIO will ensure respirators are used in accordance with the OSHA Respiratory Protection standard (29 CFR 1910.134), and other PPE is used in accordance with OSHA's PPE standards (29 CFR 1910 subpart I).

TRIO will provide PPE at designated PPE stations throughout the workplace. PPE supplied will be in accordance with the CDC and Lippincott's guidance on Standard and Transmission-Based Precautions.

For aerosol-generating procedures (AGPs) on a person with suspected or confirmed COVID-19, TRIO will provide a respirator to each employee and ensure it is used in accordance with the OSHA Respiratory Protection standard (29 CFR 1910.134). TRIO will also provide gloves, an isolation gown or protective clothing, and eye protection to each employee, and ensure use in accordance with OSHA's PPE standards (29 CFR 1910 subpart I).

TRIO will provide PPE at designated PPE stations throughout the workplace to employees performing or assisting with AGPs on a person with suspected or confirmed COVID-19. If available, elastomeric respirators or powered air-purifying respirators (PAPRs) will be provided instead of filtering facepiece respirators for AGPs on a person with suspected or confirmed COVID-19.

TRIO and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees or representatives to assess and address COVID-19 hazards, including when there is employee exposure to people with suspected or confirmed COVID-19

Aerosol-generating procedures (AGPs) on a person with suspected or confirmed COVID-19.

When an AGP is performed on a person with suspected or confirmed COVID-19, TRIO will:

- Provide a respirator and other PPE, as discussed in the previous section;
- Limit the number of employees present during the procedure to only those essential for patient care and procedure support;
- Ensure that the procedure is performed in an existing airborne infection isolation room (AIIR), if available; and
 - Door must remain closed throughout procedure
- Clean and disinfect the surfaces and equipment in the room or area where the procedure was performed, after the procedure is completed.

TRIO and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to assess and address COVID-19 hazards while performing AGPs. [[OSHA's COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis may be useful.](#)]

Physical Distancing

TRIO will ensure that each employee is separated from all other people in the workplace by at least 6 feet when indoors, unless it can be demonstrated that such physical distance is not feasible for a specific activity. Where maintaining 6 feet of physical distance is not feasible, TRIO will ensure employees are as far apart from other people as possible. Physical distancing will be implemented, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach.

TRIO and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to assess physical distancing in the workplace.

Signs will be posted throughout the facility as a reminder to visitors and staff to maintain a physical distance of 6ft.

Employees will be encouraged to extend space between work stations when single occupancy office space is not available.

Seating for staff meetings/gatherings will be arranged to accommodate physical distancing requirements.

Physical Barriers

TRIO will install physical barriers at each fixed work location outside of direct patient care areas where each employee is not separated from all other people by at least 6 feet of distance and spacing cannot be increased, unless it can be demonstrated that it is not feasible to install such physical barriers. Physical barriers will be implemented, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach.

TRIO and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to identify where physical barriers are needed

Where feasible, TRIO will ensure that:

- Physical barriers are solid and made from impermeable materials;
- Physical barriers are easily cleanable or disposable;
- Physical barriers are sized (i.e., height and width) and located to block face-to-face pathways between individuals based on where each person would normally stand or sit;
- Physical barriers are secured so that they do not fall or shift, causing injury or creating a trip or fall hazard;
- Physical barriers do not block workspace air flow or interfere with the heating, ventilation, and air conditioning (HVAC) system operation;
- Physical barriers are transparent in cases where employees and others have to see each other for safety; and
- Physical barriers do not interfere with effective communication between individuals.

Barriers will be located at:

- Entrances utilized by employees, vendors, essential workers, and visitors in the COVID-19 screening / PPE area
- Public facing fixed workstations (e.g., entryway/lobby, receptionist);

How barriers will be constructed/supported:

- Free-standing on a countertop and secured;
- Hung from above and extending down from the ceiling or other fixture and secured so as not to fall, flap, or move.

Cleaning and Disinfection

TRIO will implement policies and procedures for cleaning, disinfection, and hand hygiene, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach. TRIO and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to implement cleaning, disinfection, and hand hygiene in the workplace.

In patient care areas, resident rooms, and for medical devices and equipment:

TRIO will follow standard practices for cleaning and disinfection of surfaces and equipment in accordance with CDC's "[COVID-19 Infection Prevention and Control Recommendations](#)" and CDC's "[Guidelines for Environmental Infection Control](#)."

In all other areas:

TRIO requires the cleaning of high-touch surfaces and equipment at least once a day, following manufacturers' instructions for the application of cleaners.

When a person who is COVID-19 positive has been in the workplace within the last 24 hours, TRIO requires cleaning and disinfection, in accordance with CDC's "[Cleaning and Disinfecting Guidance](#)," of any areas, materials, and equipment that have likely been contaminated by that person (e.g., rooms they occupied, items they touched).

The cleaning and disinfection schedule will be set and maintained by Healthcare Services Group. Healthcare Services Group is responsible for selecting cleaning and disinfecting products that will be used in the workplace. Healthcare Services Group will be responsible for how patient care areas will be cleaned, resident rooms, medical devices, equipment, and how the work place will be cleaned and disinfected if a COVID-19 positive person has been in the workplace within the last 24 hours.

TRIO will provide alcohol-based hand rub that is at least 60% alcohol or provide readily accessible hand washing facilities. In addition, signs will be posted encouraging frequent handwashing and use of hand sanitizers.

Hand sanitizing stations will be set up at the main entrance, breakrooms, visitation areas, and throughout the facility. These stations will be monitored and maintained by the Healthcare Services Group.

Ventilation

TRIO will implement policies and procedures for each facility’s heating, ventilation, and air conditioning (HVAC) system and ensure that:

- The HVAC system(s) is used in accordance with the manufacturer’s instructions and the design specifications of the HVAC system(s);
- The amount of outside air circulated through the HVAC system(s) and the number of air changes per hour are maximized to the extent appropriate;
- All air filters are rated Minimum Efficiency Reporting Value (MERV) 13 or higher, if compatible with the HVAC system(s); if not compatible, the filter with the highest compatible filtering efficiency is used;
- All air filters are maintained and replaced as necessary to ensure the proper function and performance of the HVAC system;
- All intake ports that provide outside air to the HVAC system(s) are cleaned, maintained, and cleared of any debris that may affect the function and performance of the HVAC system(s); and
- Existing airborne infection isolation rooms (AIIRs), if any, are maintained and operated in accordance with their design and construction criteria.

Ventilation policies and procedures will be implemented, along with the other provisions required by OSHA’s COVID-19 ETS, as part of a multi-layered infection control approach. TRIO will identify the building manager, HVAC professional, or maintenance staff member who can certify that the HVAC system(s) are operating in accordance with the ventilation provisions of OSHA’s COVID-19 ETS and list the individual(s) below.

The following individual(s) is responsible for maintaining the HVAC system(s) and can certify that it is operating in accordance with the ventilation provisions of OSHA’s COVID-19 ETS. <i>(e.g., Maintenance staff, HVAC service contractor(s))</i>	
Maintenance Director /Alleghany	540-862-5791
Maintenance Director /Bayside	757-868-9960
Maintenance Director /EA Crump	804-672-8725
Maintenance Director / Elizabeth House	804-672-7580
Maintenance Director / Fredericksburg & Fredericksburg ALF	540 786 8351
Maintenance Director/Galax	276-236-9991
Maintenance Director /Martinsville	276-632-7146
Maintenance Director /Portsmouth VA	757-393-6864
Maintenance Director /Rose Hill	540-955-9995
Maintenance Director /Shenandoah Valley	540-261-7444
Maintenance Director /Beavercreek	937-429-9655
Maintenance Director /Bellbrook	937-848-7800
Maintenance Director /Centerville & Centerville ALF	937-433-3441
Maintenance Director /Englewood	937-836-5143
Maintenance Director /Jamestown	937-675-3311
Maintenance Director /Portsmouth	740-354-8150
Maintenance Director /Xenia	937-376-2121

In addition, TRIO will provide each location with air purifiers that help prevent the spread of COVID-19. For more information please refer to the RENSAIR policy located in the Maintenance Manual.

Health Screening

TRIO will screen each employee before each work day and at each shift.

Employees will be screened for COVID-19 symptoms in-person when reporting to work. Employees are also asked to self-monitor for COVID-19 symptoms before reporting to work and throughout their shift.

Employee Notification to Employer of COVID-19 Illness or Symptoms

TRIO will require employees to promptly notify their supervisor or COVID-19 Safety Coordinator when they have tested positive for COVID-19 or been diagnosed with COVID-19 by a licensed healthcare provider, have been told by a licensed healthcare provider that they are suspected to have COVID-19, are experiencing recent loss of taste and/or smell with no other explanation, or are experiencing both fever ($\geq 99.5^{\circ}$ F) and new unexplained cough associated with shortness of breath.

If employees are experiencing symptoms of COVID-19 while at home they are required to contact their supervisor or COVID-19 Safety Coordinator immediately via phone. Employees experiencing COVID-19 symptoms will be asked to take a COVID-19 test before reporting to work. If an employee begins to experience symptoms while working they are required to notify their supervisor or COVID-19 Safety Coordinator immediately. The employee will be required to take a COVID-19 test

TRIO provides paid time off that may be utilized when they are sick, when household members are sick, or when required by a healthcare provider to isolate or quarantine themselves or a member of their household.

Employer Notification to Employees of COVID-19 Exposure in the Workplace

TRIO will notify employees if they have been exposed to a person with COVID-19 at their workplace, as described below. The notification provisions below are not triggered by the presence of a patient with confirmed COVID-19 in a workplace where services are normally provided to suspected or confirmed COVID-19 patients (e.g., emergency rooms, urgent care facilities, COVID-19 testing sites, COVID-19 wards in hospitals). When TRIO is notified that a person who has been in the workplace (including employees, clients, patients, residents, vendors, contractors, customers, delivery people and other visitors, or other non-employees) is COVID-19 positive, TRIO will, within 24 hours:

- Notify each employee who was not wearing a respirator and any other required PPE and has been in close contact with the person with COVID-19 in the workplace. The notification must state the fact that the employee was in close contact with someone with COVID-19 along with the date(s) the contact occurred.
- Notify all other employees who were not wearing a respirator and any other required PPE and worked in a well-defined portion of a workplace (e.g., a particular floor) in which the person with COVID-19 was present during the potential transmission period. The notification must specify the date(s) the person with COVID-19 was in the workplace during the potential transmission period.
- Notify other employers whose employees were not wearing a respirator and any other required PPE and have been in close contact with the person with COVID-19, or worked in a well-defined portion of a workplace (e.g., a particular floor) in which that person was present, during the potential transmission period. The notification must specify the date(s) the person with COVID-19 was in the workplace during the potential transmission period and the location(s) where the person with COVID-19 was in the workplace.

Notifications will not include the name, contact information, or occupation of the COVID-19 positive person.

Note: Close contact means being within 6 feet of the person for a cumulative total of 15 minutes or more over a 24-hour period during the person's potential transmission period. The potential transmission period runs from 2 days before the person felt sick (or, if not showing symptoms, 2 days before testing) until the time the person is isolated.

Employees will be notified of exposure through one of the following methods:

- Phone call
- Email
- In-person staff meeting
- Letter

Medical Removal from the Workplace

TRIO has also implemented a policy for removing employees from the workplace in certain circumstances. TRIO will immediately remove an employee from the workplace when:

- The employee is COVID-19 positive (i.e., confirmed positive test for, or has been diagnosed by a licensed healthcare provider with, COVID-19);
- The employee has been told by a licensed healthcare provider that they are suspected to have COVID-19;
 - Employee will be required to take a COVID-19 test
- The employee is experiencing recent loss of taste and/or smell with no other explanation; or
 - Employee will be required to take a COVID-19 test
- The employee is experiencing both a fever of at least 99.5°F and new unexplained cough associated with shortness of breath.
 - Employee will be required to take a COVID-19 test

For employees removed because they are COVID-19 positive, TRIO will keep them removed until they meet the return-to-work criteria discussed below. For employees removed because they have been told by a licensed healthcare provider that they are suspected to have COVID-19, or are experiencing symptoms as discussed above, TRIO will keep them removed until they meet the return-to-work criteria discussed below or keep them removed and provide a COVID-19 polymerase chain reaction (PCR) test at no cost to the employee. If the employee tests negative, they can return to work immediately. If the employee tests positive or refuses a test, they must remain excluded from the workplace until the return-to-work criteria below are met. If the employee refuses to take the test, TRIO will continue to keep the employee removed from the workplace, but is not obligated to provide the medical removal protection benefits discussed below (Note: absent undue hardship, TRIO will make reasonable accommodations for employees who cannot take the test for religious or disability-related medical reasons, consistent with applicable non-discrimination laws.)

If TRIO notifies an employee that they were in close contact with a person in the workplace (including employees, clients, patients, residents, vendors, contractors, customers, delivery people and other visitors, or other non-employees) who is COVID-19 positive when that employee was not wearing a respirator and any other required PPE, TRIO will immediately remove the employee from the workplace unless:

1. The employee does not experience recent loss of taste and/or smell with no other explanation, or fever of at least 99.5°F and new unexplained cough associated with shortness of breath; AND
2. The employee has either been fully vaccinated against COVID-19 (i.e., 2 weeks or more following the final dose) or had COVID-19 and recovered within the past 3 months.

TRIO will keep the employee removed from the workplace for 15 days. At the end of 15 days the employee will be required to take a COVID-19 test. If the employee tests negative, they may return to work. If the employee tests positive, the employee must remain excluded from the workplace until the return-to-work criteria below are met. If the employee refuses a test, TRIO will keep the employee excluded for 20 days, but is not obligated to provide the medical removal protection benefits discussed below (Note: absent undue hardship, TRIO will make reasonable accommodations for employees who cannot take the test for religious or disability-related medical reasons, consistent with applicable non-discrimination laws).

Any time an employee must be removed from the workplace, TRIO may require the employee to work remotely or in isolation if suitable work is available. When allowing an employee to work remotely or in isolation, TRIO will continue to pay that employee the same regular pay and benefits the employee would have received had the employee not been absent.

TRIO will not subject its employees to any adverse action or deprivation of rights or benefits because of their removal from the workplace due to COVID-19.

Return to Work Criteria

TRIO will only allow employees who have been removed from the workplace to return to work in accordance with guidance from a licensed healthcare provider or in accordance with the CDC's "Isolation Guidance" and "Return to Work Healthcare Guidance." Pursuant to CDC guidance, symptomatic employees may return to work after all the following are true:

- At least 20 days have passed since symptoms first appeared, and
- At least 24 hours have passed with no fever without fever-reducing medication, and
- Other symptoms of COVID-19 are improving (loss of taste and smell may persist for weeks or months and need not delay the end of isolation).

If an employee has severe COVID-19 or an immune disease, TRIO will follow the guidance of a licensed healthcare provider regarding return to work.

Pursuant to CDC guidance, asymptomatic employees may return to work after at least 10 days have passed since a positive COVID-19 test. However, it is TRIO policy to keep positive employees removed from work for 20 days.

If TRIO receives guidance from a healthcare provider that an employee may not return to work, they will follow that guidance.

Medical Removal Protection Benefits

TRIO will continue to pay employees who have been removed from the workplace under the medical removal provisions of OSHA's COVID-19 ETS. When an employee has been removed from the workplace and is not working remotely or in isolation, TRIO will:

- Continue to provide the benefits to which the employee is normally entitled and pay the employee the same regular pay the employee would have received had the employee not been absent from work, up to \$1,400 per week per employee.
 - The facility is required to reach out to corporate Human Resources for guidance should the situation arise.
- Payment will be reduced by the amount of compensation the employee receives from any other source, such as a publicly or employer-funded compensation program (e.g., paid sick leave, administrative leave, PTO)
- Follow all applicable Family Medical Leave Act laws.

Vaccination

TRIO encourages employees to receive the COVID-19 vaccination as a part of a multi-layered infection control approach. TRIO will support COVID-19 vaccination for each employee by providing reasonable time and paid leave to each employee for vaccination and any side effects experienced following vaccination.

TRIO will provide in-house vaccination clinics to its employees. Accrued Paid Time Off may be used for employees requiring leave due to side effects.

Training

TRIO will implement policies and procedures for employee training, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach. TRIO and the COVID-19 Safety Coordinator(s) will

work collaboratively with non-managerial employees and their representatives to assess COVID-19 hazards and implement an employee training program at each facility.

TRIO's COVID-19 training program will be conducted in the following ways:

- Online Training
 - CMS COVID-19 (<https://qsep.cms.gov/COVID-Training-Instructions.aspx>)
 - Relias Trainings
- Department Meetings
- Discussions with Supervisors
- In-services

TRIO will ensure that each employee receives training, in a language and at a literacy level the employee understands, on the following topics:

- COVID-19, including:
 - How COVID-19 is transmitted (including pre-symptomatic and asymptomatic transmission);
 - The importance of hand hygiene to reduce the risk of spreading COVID-19 infections;
 - Ways to reduce the risk of spreading COVID-19 through proper covering of the nose and mouth;
 - The signs and symptoms of COVID-19;
 - Risk factors for severe illness; and
 - When to seek medical attention;
- TRIO's policies and procedures on patient screening and management;
- Tasks and situations in the workplace that could result in COVID-19 infection;
- Workplace-specific policies and procedures to prevent the spread of COVID-19 that are applicable to the employee's duties (e.g., policies on Standard and Transmission-Based Precautions, physical distancing, physical barriers, ventilation, aerosol-generating procedures);
- Employer-specific multi-employer workplace agreements related to infection control policies and procedures, the use of common areas, and the use of shared equipment that affect employees at the workplace;
- TRIO's policies and procedures for PPE worn to comply with OSHA's COVID-19 ETS, including:
 - When PPE is required for protection against COVID-19;
 - Limitations of PPE for protection against COVID-19;
 - How to properly put on, wear, and take off PPE;
 - How to properly care for, store, clean, maintain, and dispose of PPE; and
 - Any modifications to donning, doffing, cleaning, storage, maintenance, and disposal procedures needed to address COVID-19 when PPE is worn to address workplace hazards other than COVID-19;
- Workplace-specific policies and procedures for cleaning and disinfection;
- TRIO's policies and procedures on health screening and medical management;
- Available sick leave policies, any COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws, and other supportive policies and practices (e.g., telework, flexible hours);
- The identity of TRIO's Safety Coordinator(s) specified in this COVID-19 plan;
- OSHA's COVID-19 ETS; and
- How the employee can obtain copies of OSHA's COVID-19 ETS and any employer-specific policies and procedures developed under OSHA's COVID-19 ETS, including this written COVID-19 plan.

TRIO will ensure that the training is overseen or conducted by a person knowledgeable in the covered subject matter as it relates to the employee's job duties, and that the training provides an opportunity for interactive questions and answers with a person knowledgeable in the covered subject matter as it relates to the employee's job duties.

TRIO will provide additional training whenever changes occur that affect the employee's risk of contracting COVID-19 at work (e.g., new job tasks), policies or procedures are changed, or there is an indication that the employee has not retained the necessary understanding or skill.

Anti-Retaliation

TRIO will inform each employee that employees have a right to the protections required by OSHA's COVID-19 ETS, and that employers are prohibited from discharging or in any manner discriminating against any employee for exercising their right to protections required by OSHA's COVID-19 ETS, or for engaging in actions that are required by OSHA's COVID-19 ETS.

TRIO will not discharge, or in any manner discriminate against, any employee for exercising their right to the protections required by OSHA's COVID-19 ETS, or for engaging in actions that are required by OSHA's COVID-19 ETS.

Employees who feel they have experienced retaliation may contact the compliance hotline at 844-587-1659

Requirements implemented at no cost to employees

TRIO will comply with the provisions of OSHA's COVID-19 ETS at no cost to its employees, with the exception of any employee self-monitoring conducted under the Health Screening and Medical Management section of this Plan.

Recordkeeping

TRIO will retain all versions of this COVID-19 plan implemented to comply with OSHA's COVID-19 ETS while the ETS remains in effect.

TRIO will establish and maintain a COVID-19 log to record each instance in which an employee is COVID-19 positive, regardless of whether the instance is connected to exposure to COVID-19 at work. The COVID-19 log will contain, for each instance, the employee's name, one form of contact information, occupation, location where the employee worked, the date of the employee's last day at the workplace, the date of the positive test for, or diagnosis of, COVID-19, and the date the employee first had one or more COVID-19 symptoms, if any were experienced.

TRIO will record the information on the COVID-19 log within 24 hours of learning that the employee is COVID-19 positive. TRIO will maintain the COVID-19 log as a confidential medical record and will not disclose it except as required by OSHA's COVID-19 ETS or other federal law. (see *COVID-19 Tracking spreadsheet*.)

TRIO will maintain and preserve the COVID-19 log while OSHA's COVID-19 ETS remains in effect.

By the end of the next business day after a request, TRIO will provide, for examination and copying:

- All versions of the written COVID-19 plan to all of the following: any employees, their personal representatives, and their authorized representatives.
- The individual COVID-19 log entry for a particular employee to that employee and to anyone having written authorized consent of that employee;
- A version of the COVID-19 log that removes the names of employees, contact information, and occupation, and only includes, for each employee in the COVID-19 log, the location where the employee worked, the last day that the employee was at the workplace before removal, the date of that employee's positive test for, or diagnosis of, COVID-19, and the date the employee first had one or more COVID-19 symptoms, if any were experienced, to all of the following: any employees, their potential representatives, and their authorized representatives.

Reporting

TRIO will report the following to OSHA by calling 1-800-321-6742

- Each work-related COVID-19 fatality within 8 hours of TRIO learning about the fatality;
- Each work-related COVID-19 in-patient hospitalization within 24 hours of TRIO learning about the in-patient hospitalization.

4. **Monitoring Effectiveness**

TRIO and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to monitor the effectiveness of this COVID-19 plan so as to ensure ongoing progress and efficacy.

TRIO will update this COVID-19 plan as needed to address changes in workplace-specific COVID-19 hazards and exposures.

5. **Coordination with Other Employers**

TRIO will communicate this COVID-19 plan with all other employers that share the same worksite, and will coordinate with each employer to ensure that all workers are protected.

TRIO will adjust this COVID-19 plan to address any particular hazards presented by employees of other employers at the worksite.

TRIO will coordinate with, but not limited to any temporary agencies, hospice, primary care physicians, podiatrists, dietitians, behavioral health professionals, wound physicians, and any other entity that visits a TRIO location for an extended period of time to ensure employees are protected. (See attached list for location specific information)

6. **Signature and Plan Availability**

TRIO has prepared and issued this COVID-19 plan on 7/6/2021.

Employer Name:	TRIO
Address:	10 Glenlake Parkway Suite 140 Atlanta, GA 30328
Business Owner:	Melissa Green, CCO

This COVID-19 plan is available:

<input type="checkbox"/> Via hard copy at any TRIO location	<input type="checkbox"/> Posted to the shared (P:) Drive and on each locations webpage	<input type="checkbox"/> Available by verbal request at any TRIO location
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