

## COVID-19 Plan Template

- OSHA’s COVID-19 Healthcare Emergency Temporary Standard (ETS), paragraph (c), requires employers to develop and implement a COVID-19 plan for each workplace to protect workers from COVID-19. If an employer has more than 10 employees, the plan must be written. Employers may use this template to develop a COVID-19 plan for their workplace.
- If employers choose to use this template, there are 2 STEPS to complete:
  - STEP 1: Determine if OSHA’s COVID-19 Healthcare ETS applies to your workplace or portions of your workplace.
  - STEP 2: Customize this COVID-19 plan template for your workplace.

### STEP 1: Determine if the ETS applies to your workplace or portions of your workplace.

You may use the “Is your workplace covered by the COVID-19 Healthcare ETS?” flow chart to determine whether and how OSHA’s COVID-19 Healthcare ETS applies to your workplace. Note that this determination must be made for each workplace where your employees work.

### STEP 2: Customize this COVID-19 plan template for your workplace.

Customize areas marked with blue text and modify (change, add, or remove sections of) this document until the plan accurately represents your policies. The plan must match the policies, procedures, and controls that will be implemented in the workplace, and must accurately describe what employees are expected to do. Consult with non-managerial employees and their representatives, if any, before finalizing this plan.

## St. Lawrence Health’s COVID-19 Plan

### 1. Purpose and Scope

St. Lawrence Health is committed to providing a safe and healthy workplace for all our employees. St. Lawrence Health 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).

St. Lawrence Health has multiple workplaces that are substantially similar, and therefore has developed a single COVID-19 plan for the substantially similar workplaces, with site-specific considerations included in the table below.

Facility Location	Worksite-Specific COVID-19 Considerations

### 2. Roles and Responsibilities

St. Lawrence Health’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 St. Lawrence Health’s full support in implementing and monitoring this COVID-19 plan, and has authority to ensure compliance with all aspects of this plan.

St. Lawrence Health 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.

Non-managerial employees will be consulted for input in completion of OSHA’s COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis. Their suggestions and concerns will be included in any corrective actions identified.

<b>COVID-19 Safety Coordinator(s)</b>		
<b>Name</b>	<b>Title/Facility Location</b>	<b>Contact Information (office location, phone, email address)</b>
Kim Weir	Occupational Health Manager	CPH – Human Resources Office, Lamar Building 315-261-5107 <a href="mailto:kweir@cphospital.org">kweir@cphospital.org</a>
Jesse Boula	Clinical Operations Manager of Credentialing and Regulatory Affairs	CPH – 13 Grove St. 315-261-5062 <a href="mailto:jboula@cphospital.org">jboula@cphospital.org</a>
Nancy Pinckney	Infection Prevention Specialist	CPH – 50 Leroy St. 315-261-5114 <a href="mailto:npinckney@cphospital.org">npinckney@cphospital.org</a>

### **3. Hazard Assessment and Worker Protections**

St. Lawrence Health 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).

St. Lawrence Health has identified the following well-defined areas of the workplace where fully vaccinated employees are exempt from the personal protective equipment (PPE), physical distancing, and physical barrier requirements of the ETS because there is no reasonable expectation that any person with suspected or confirmed COVID-19 will be present:

#### **Canton-Potsdam Hospital**

- Hospital campus, Conference Rooms A & B
- Hospital campus, Classroom
- Hospital campus, Administration Conference Room
- Hospital campus, 2<sup>nd</sup> floor, Administrative Offices
- Hospital campus, Physician’s Mail/Conference Room

#### **Gouverneur Hospital**

- Hospital campus, Board Room
- Hospital campus, East Wing Community Room
- Hospital campus, East Wing Administrative Offices
- Hospital campus, Administrative Conference Room
- Hospital campus, Library

## **Massena Hospital**

Hospital campus, Board Room

Hospital campus, Community Education Room

Hospital campus, 2<sup>nd</sup> floor Administrative Offices

## **PPM**

EJ Noble building, Betty Evans Room

Lawrence Ave building, Community Room

Medical Campus building, Board Room

## **Administrative Sites**

EJ Noble Finance Department Conference Rooms and Offices

SeaComm Finance Department Conference Rooms and Offices

20 Cottage Building, Top floor Conference Rooms and Offices

Beal Street Offices

Call Center at PC Plaza

Clinical Research at Old Snell

45 Waverly St. (Compliance, Quality, Medical Staff)

Lamar Building

Sparx Building

Old Snell (Quarry) Building

Off-campus Linens and Laundry

Materials Management Off-campus Warehouse

White House Maintenance Building, Gouverneur campus

St. Lawrence Health has developed the following procedure to determine employees' vaccination status:

Employee vaccine status will be determined by employees registering with Occupational Health proving vaccination status and receiving a "Crush COVID" badge sticker.

St. Lawrence Health 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.

St. Lawrence Health 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:

- COVID-19 Staff Screening, Potential COVID-19 Staff Exposure, and Confirmed Staff Cases
- COVID-19 Vaccine Policy
- Universal Mask Wearing Policy
- COVID-19 Employee Toolkit
- Infection Prevention – Hand Hygiene Policy
- Infection Prevention – Standard Precautions – Transmission Based Isolation
- COVID-19 PPE Donning and Doffing
- Wearing and Removing a Simple Mask
- Donning and Doffing of the N95 Mask
- Patient Transport Guidelines for COVID-19
- EVS and Diagnostic and Treatment Departments PPE
- Universal PPE Guidelines
- Face Shield Adjustment Instructions
- Face Shield Cleaning Instructions
- Face Shield Skin Protection Under N95 PPE
- Inspection, Cleaning, and Storage Procedures for 3M™ Versaflo™ PAPR TR-300, TR-300+, and TR-600

- N95 Mask Decontamination Process
- Fit Seal Check of N95 Masks
- BYD N95 Mask Wearing Instructions
- ED Screening Algorithm for Highly Communicable Viral Illnesses
- PPM Screening Algorithm for Highly Communicable Viral Illnesses

### ***Patient Screening and Management***

In settings where direct patient care is provided, St. Lawrence Health will:

- Limit and monitor points of entry to the setting;
- Screen and triage all clients, patients, residents, delivery people, 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
- Use telehealth services in outpatient settings where appropriate in order to limit the number of people entering the workplace.

Certain badge-access points of entry will be reactivated for vaccinated staff. Vaccinated staff no longer have to be subjected to the full COVID-19 screening process. Upon entrance to the worksite and utilizing a badge swipe entrance and/or timeclock, or by showing your SLH badge and "CRUSH COVID-19" badge sticker, you are attesting that in the past 24 hours you have NOT experienced any COVID-19 symptoms.

Employees and providers are instructed to use staff-designated entrances/exits while we continue working to expand access of our in-house services. With the greatest respect for easy, unobstructed access to care by our patients, we reserve the main entrance as their exclusive access point.

### **Employees and providers arriving/departing the main entrance will be redirected to a staff-designated entrance.**

Employees and providers must be screened upon entry *and may be subject to a rescreening.*

### ***Standard and Transmission-Based Precautions***

St. Lawrence Health has developed and implemented policies and procedures to adhere to Standard and Transmission-Based Precautions in accordance with CDC's "[Guidelines for Isolation Precautions.](#)"

St. Lawrence Health 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)***

St. Lawrence Health 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 have been 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 St. Lawrence Health will be FDA-cleared, authorized by an FDA Emergency Use Authorization, or otherwise offered or distributed as described in an FDA enforcement policy. St. Lawrence Health 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). St. Lawrence Health 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). St. Lawrence Health will also permit employees to wear their own respirator instead of a facemask and, 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.

In accordance with SLH Universal Mask Wearing Policy, and instructions provided in the COVID-19 Toolkit: Employees will be provided with facemasks upon entering the facility and any time they are soiled or damaged. All SLHS employees working in all areas of SLHS including, but not limited to, inpatient units, ambulatory clinic spaces, procedural areas, non-clinical settings and office spaces will be required to wear a procedural/surgical face masks at all times. Hospital-issued procedural/surgical masks must be worn upon entry to any building of the SLHS.

They will be worn in accordance with the Universal Mask Wearing policy.

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. The following are additional exceptions to St. Lawrence Health's requirements for facemasks:

1. When an employee is alone in a room.
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, St. Lawrence Health 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. When an exception applies, St. Lawrence Health will ensure that any such employee wears a face shield, if their condition or disability permits it. St. Lawrence Health will provide accommodations for religious beliefs consistent with Title VII of the Civil Rights Act.
6. St. Lawrence Health 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 performing the following job tasks: working with high voltage electricity, plumbing that includes brazing and soldering, and welding. When this is the case, St. Lawrence Health 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 St. Lawrence Health otherwise requires use of a face shield, St. Lawrence Health will ensure that face shields are cleaned at least daily and are not damaged.

St. Lawrence Health will not prevent any employee from voluntarily wearing their own 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, St. Lawrence Health 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).

PPE will be supplied and used in accordance with the Infection Prevention – Personal Protective Equipment (PPE) and Infection Prevention – Standard Precautions – Transmission-Based Isolation policies.

For employees with exposure to people with suspected or confirmed COVID-19, St. Lawrence Health will provide respirators and other PPE, including gloves, an isolation gown or protective clothing, and eye protection. St. Lawrence Health 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).

Staff are supplied PPE in accordance with the Infection Prevention – Personal Protective Equipment (PPE) and Infection Prevention – Standard Precautions – Transmission-Based Isolation policies. Additionally, location specific PPE guidance is provided for staff in the EVS and Diagnostic and Treatment Departments PPE guidelines.

For aerosol-generating procedures (AGPs) on a person with suspected or confirmed COVID-19, St. Lawrence Health will provide a respirator to each employee and ensure it is used in accordance with the OSHA Respiratory Protection standard (29 CFR 1910.134). St. Lawrence Health 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).

St. Lawrence Health 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, St. Lawrence Health 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
- Clean and disinfect the surfaces and equipment in the room or area where the procedure was performed, after the procedure is completed.

St. Lawrence Health 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.

### ***Physical Distancing***

St. Lawrence Health 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, St. Lawrence Health 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.

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

St. Lawrence Health made updates to workplace flow with the following environmental changes:

- Telehealth, telework, flexible work hours, staggered and/or additional shifts have been made available based on departmental needs.

### *Physical Barriers*

St. Lawrence Health 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.

St. Lawrence Health 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, St. Lawrence Health 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.

### *Cleaning and Disinfection*

St. Lawrence Health 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. St. Lawrence Health 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:

St. Lawrence Health 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:

St. Lawrence Health 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, St. Lawrence Health 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).

Cleaning and disinfection practices will be performed by the Environmental Services staff. This will be done in accordance with the Sanitation and Cleaning Procedures and the Infection Prevention – Infection Prevention Practices – Cleanliness of the environment and Equipment policies.

St. Lawrence Health will provide alcohol-based hand rub that is at least 60% alcohol or provide readily accessible hand washing facilities. Hand washing stations are located in all inpatient and Emergency Department rooms. There is one common hand washing station in the Observation area. Hand sanitizer stations are located outside of every patient room. These are supplied and cleaned by Environmental Services and any maintenance is performed by our Facilities staff.

### *Ventilation*

St. Lawrence Health 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. St. Lawrence Health 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.

Additional measures used to improve building ventilation include:

- Maintenance of occupancy air changes even during non-operational hours
- All negative air machines were run with HEPA filters and were changed whenever a COVID room was turned over
- Air purifiers were provided upon request and in meeting areas



**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.**

*(e.g., Maintenance staff, HVAC service contractor(s))*

<u>Name/Contact Information:</u>	<u>Location:</u>
Randy VanBrocklin – C: (315)261-9009, email: <a href="mailto:rvanbrocklin@cphospital.org">rvanbrocklin@cphospital.org</a>	SLHS
<u>Name/Contact Information:</u>	<u>Location:</u>

### **Health Screening and Medical Management**

#### Health Screening

Employees are required to self-monitor symptoms. The following language will be posted at all entrances:

Attention All SLH Employees: By utilizing badge swipe entrance and/or timeclock or by showing your SLH badge upon entrance to the facility, you are attesting that in the past 24 hours you have NOT experienced any of the following: fever, cough, sore throat, chills, diarrhea, shortness of breath, loss of ability to smell, reduced sense of taste. If you are experiencing any of these symptoms, please do not work and contact Employee Health at 315-261-5107.

#### Employee Notification to Employer of COVID-19 Illness or Symptoms

St. Lawrence Health 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 ( $\geq 100.4^{\circ}$  F) and new unexplained cough associated with shortness of breath.

SLH utilizes a system called GetWell Loop. The system is an app-based tool that employees can download to report their symptoms daily, send messages and questions, and is monitored daily by Occupational Health nurses.

There is currently a policy in place called COVID-19 Staff Screening, Potential COVID-19 Staff Exposure, and Confirmed Staff Cases that outlines the process for decreasing exposure to individuals who may have been exposed to a person with COVID-19.

The SLHS Paid Time Off and Family Medical Leave Act Policies provide paid time off due to personal or family illness. All sick time requests will be handled in accordance with these policies.

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

St. Lawrence Health 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 St. Lawrence Health 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, St. Lawrence Health 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.

When Occupational Health is notified that there has been an exposure, they reach out to the manager of the affected department to get a list of employees involved. They then reach out to employees via phone if available to interview the employee to determine if they met exposure criteria. If employees meet the criteria, they are considered exposed and are restricted from working. The employees are then given guidance on how to get tested and are reported to Public Health. They are then monitored daily using the GetWell Loop until they meet criteria to return to work.

### Medical Removal from the Workplace

St. Lawrence Health has also implemented a policy for removing employees from the workplace in certain circumstances. St. Lawrence Health 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;
- The employee is experiencing recent loss of taste and/or smell with no other explanation; or
- The employee is experiencing both a fever of at least 100.4°F and new unexplained cough associated with shortness of breath.

For employees removed because they are COVID-19 positive, St. Lawrence Health 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, St. Lawrence Health will keep them removed until they meet the return-to-work criteria discussed below or keep them removed and provide an Abbott ID NOW 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, St. Lawrence Health 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, employers must make reasonable accommodations for employees who cannot take the test for religious or disability-related medical reasons, consistent with applicable non-discrimination laws).

If St. Lawrence Health 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, St. Lawrence Health 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 100.4°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.

St. Lawrence Health will keep the employee removed from the workplace for 14 days with continuous daily symptom monitoring. It will be recommended that they adhere to all recommended non-pharmaceutical interventions including hand hygiene and the use of face coverings through day 14. They will be instructed to immediately self-isolate if any symptoms develop and contact the local public health authority or their PCP to report this change in clinical status and determine if they should seek testing. Employees exposed to COVID-19 that are fully vaccinated or recovered from SARS-CoV-2 and asymptomatic do not need to quarantine. SLH will adhere to the COVID-19 Staff Screening, Potential COVID-19 Staff Exposure, and Confirmed Staff Cases policy.

Any time an employee must be removed from the workplace, St. Lawrence Health 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, St. Lawrence Health will continue to pay that employee the same regular pay and benefits the employee would have received had the employee not been absent.

St. Lawrence Health 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

St. Lawrence Health 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 10 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, St. Lawrence Health 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. If an employer receives guidance from a healthcare provider that the employee may not return to work, they must follow that guidance.

Employees will be able to return to work following removal from the workplace in accordance with the COVID-19 Staff Screening, Potential COVID-19 Staff Exposure, and Confirmed Staff Cases policy.

#### Medical Removal Protection Benefits

St. Lawrence Health 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, St. Lawrence Health will ensure that employees removed from the workplace and not working remotely continue to receive pay and benefits in accordance with the COVID-19 Staff Screening, Potential COVID-19 Staff Exposure, and Confirmed Staff Cases policy, PTO policy and FMLA policy.

### **Vaccination**

St. Lawrence Health encourages employees to receive the COVID-19 vaccination as a part of a multi-layered infection control approach. St. Lawrence Health 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.

Detailed information on PTO usage for each SLHS entity can be found in the PTO Procedures for the respective sites, which are linked below:

- [Canton-Potsdam Hospital Workforce Members Paid Time Off \(PTO\) Procedures](#)
- [Gouverneur Hospital Workforce Members Paid Time Off \(PTO\) Procedures](#)
- [Massena Hospital Workforce Members Paid Time Off \(PTO\) Procedures](#)
- [SLHS Workforce Members Paid Time Off \(PTO\) Procedures](#)

### **Training**

St. Lawrence Health 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. St. Lawrence Health 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.

St. Lawrence Health's COVID-19 training program will be accessible through the organizational education platform, Healthstream. A presentation will be created and posted within Healthstream allowing accessibility to all workforce members 7 days a week. A post-education quiz will accompany the content to ensure competency.

St. Lawrence Health 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;
- St. Lawrence Health'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;
- St. Lawrence Health'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;
- St. Lawrence Health'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 St. Lawrence Health'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.

St. Lawrence Health will ensure that the training is approved 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 review of the subject matter as it relates to the employee's job duties. Additionally, a post-education assessment will be provided to ensure comprehension of the material and contact information for the Safety Coordinators will be provided.

St. Lawrence Health 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***

St. Lawrence Health 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.

St. Lawrence Health 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.

### ***Requirements implemented at no cost to employees***

St. Lawrence Health 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***

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

St. Lawrence Health 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.

St. Lawrence Health will record the information on the COVID-19 log within 24 hours of learning that the employee is COVID-19 positive. St. Lawrence Health 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.

St. Lawrence Health 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, St. Lawrence Health 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**

St. Lawrence Health will report to OSHA:

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

## **4. Monitoring Effectiveness**

St. Lawrence Health 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.

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

## **5. Coordination with Other Employers**

St. Lawrence Health 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.

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

St. Lawrence Health has identified below all other employers to coordinate with and share our written work plan to ensure employees are protected.

<b>Other Worksite Employers</b>	
<b>Employer Name / Employer Representative:</b>	<b>Contact Information:</b>
Crothall	Randy VanBrocklin- <a href="mailto:rvanbrocklin@cphospital.org">rvanbrocklin@cphospital.org</a> Jeremy Dutton- <a href="mailto:jdutton@cphospital.org">jdutton@cphospital.org</a> James Barnhill- <a href="mailto:jbarnhill@cphospital.org">jbarnhill@cphospital.org</a>
Morrison	Lauren Smith- <a href="mailto:lesmith@cphospital.org">lesmith@cphospital.org</a>

## 6. Signature and Plan Availability

St. Lawrence Health has prepared and issued this COVID-19 plan 7/21/2021.

Signing Official:	
Employer Name:	St. Lawrence Health
Address:	50 Leroy St. Potsdam, NY 13676

This COVID-19 plan is available:

<input type="checkbox"/> Via hard copy in Human Resources	<input type="checkbox"/> Posted to the intranet site Sharepoint	<input type="checkbox"/> Available by request at the health system Human Resources office by contacting (315)261-5452
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