



**NULTON DIAGNOSTIC &  
TREATMENT CENTER**

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# **EMPLOYEE COVID SAFETY POLICY**

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## **Section 1 Introduction**

This COVID-19 Policy (hereinafter “COVID Packet”) is to provide you with information to ensure that we fulfill our mission of protecting you and providing the best services to our patients. Inside this packet you will find our policies relating to the safety of the worksite and resources for you.

As we all know, during this time things are fluid. As time wears on the circumstances, laws and orders require businesses like us to pivot and adapt. As a result, this Packet may be amended and updated at any time. Whenever this Packet is updated, the latest version will be uploaded on the company intranet in the Human Resources Public Folder. All updates will also be e-mailed to each employee.

Each employee should read and become familiar with the information contained in this Packet. Failure to comply with the procedures included in this Packet may result in discipline, up to and including termination.

Nothing in this Packet nor any other communication by a Nulton Diagnostic & Treatment Center (“NDTC”) representative or any other employee, whether oral or written, is intended to in any way create a contract of employment. **Your employment with NDTC is at-will. Nothing in this Packet can be construed to contradict, limit or otherwise affect your right or NDTC’s right to terminate the employment relationship at any time with or without notice or cause.**

This Packet and any amendments thereto supersede any and all prior communications from NDTC that are inconsistent with the policies included herein. This is Packet and any amendments thereto is the most up-to-date COVID Policy.

This Packet will serve as a Supplement to any Employee Handbook that has been distributed or will be distributed in the future.

## **Section 2 Management Team**

Employees with any questions relating to this COVID Packet can contact their supervisors, Human Resources and Member of the Management Team and any Pandemic Safety Officer.

### **(a) Pandemic Safety Officers**

Terri Washko and Tim Custer are the designated Pandemic Safety Officers for Nulton Diagnostic Treatment Centers at large. Any questions or concerns relating to this Policy shall be directed to Terri Washko and Tim Custer (hereinafter “Pandemic Safety Officers”).

## Section 3 COVID SCENARIOS - Diagnosis and Symptoms

### (a) Symptomatic Employees

All employees must fill out the COVID Self-Screening Form found in Credible Forms. The symptoms of COVID-19 may include:

- Fever or chills
- Cough
- Shortness of breath or difficulty breathing
- Fatigue
- Muscle or body aches
- Headache
- New loss of taste or smell
- Sore throat
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea

The above symptoms shall be referred to as “COVID Symptoms.” You are not expected nor required to find coverage for your work. If you have any of the COVID Symptoms, you must stay home. **If you are on the premises of any NDTC location (including a client’s home) and you experience these symptoms, you must immediately leave the premises/home and remain home.**

Employees must adhere to the guidelines promulgated by the CDC and their Health Care Provider. CDC information is found in the Additional Materials Section. Employees cannot return to work until they comply with the requirements set forth in Section 4(f).

No one will be subject to, and NDTC prohibits any form of intimidation or retaliation for any employee who reports to management that they are experiencing symptoms of COVID-19.

### (b) Employee Observation of Others

Employees who observe coworkers with COVID Symptoms must report these observations to the Pandemic Safety Officers. Employees who make such observations shall remain anonymous, and the reporting will be confidential. No one will be subject to, and NDTC prohibits any form of intimidation or retaliation for any employee who reports such observations to management.

**(c) Employee Diagnosed with COVID-19**

Employees who are diagnosed with COVID-19 **must stay home**.

Employees must adhere to the guidelines promulgated by the CDC and their Health Care Provider. CDC Information is found in the Additional Materials Section. Employees cannot return to work until they comply with the requirements set forth in Section 4(f).

All information relating to an employee's medical condition shall be kept confidential in accordance with all applicable laws.

No one will be subject to, and NDTC prohibits any form of intimidation or retaliation for any employee who reports to management that they are experiencing symptoms of COVID-19 or are diagnosed with COVID-19.

**Section 4 Employee Exposure**

**(a) Close Contact with Individual with a Probable Case COVID-19-Symptomatic Employee**

Any employee who has been in Close Contact with someone with a Probable case of COVID-19, must alert the Pandemic Safety Officers.

A Close Contact means the Individual was within 6 feet of an individual with a suspected case of COVID-19 for at least 15 minutes. If an Employee has such exposure, and exhibits symptoms, refer to the Protocol set forth in Section 3(a).

No one will be subject to, and NDTC prohibits any form of intimidation or retaliation for any employee who reports to management that they have been exposed to a person who is a probable or confirmed case of COVID-19.

**(b) Close Contact with a Probable Case of COVID-19- Asymptomatic Employee**

Any employee who has been in contact with someone with a probable case of COVID-19, must contact a Pandemic Safety Officer. A potential exposure means a close contact within 6 feet of an individual with confirmed COVID-19 for at least 15 minutes.

Employees who have had Close Contact (within 6 ft for at least 15 minutes) with a probable case of COVID-19, but **remain asymptomatic** must adhere to the following practices prior to and during their work shift:

- Employee will certify that they do not have a temperature at or above 100.4 degrees or any symptoms of COVID through the COVID Self-Screening Form as outlined in the Employee Protocol in Sections 5(f).
- Employee must self-monitor their symptoms
- Employee must wear a face mask **at all times while working for 14 days.**
- Employee must maintain 6 feet between themselves and other individuals.
- Employee must disinfect each area where they spend their time.
- Disinfecting the bathroom (faucet, toilet seat, door knobs) after each use.
- Adhering to the applicable cleaning and safety protocol found in Sections 5 and 6.

No one will be subject to, and NDTC prohibits any form of intimidation or retaliation for any employee who reports to management that they have been exposed to a person who is a probable or confirmed case of COVID-19.

**(c) Close Contact with Someone Who Has COVID-19**

This section applies to employees who previously had COVID-19, and employees who have taken an antibody test and have antibodies to the virus.

**Close Contact**

- Employee was within 6 ft. of someone who has COVID-19 (“Sick Person”) for at least 15 minutes.
- Employee provided care at home to someone who is sick with COVID-19.
- Employee had direct physical contact with the Sick Person (touch, hugged, or kissed them).
- Employee shared eating or drinking utensils
- The Sick Person sneezed, coughed, or somehow got respiratory droplets on you.



## **Quarantine**

- Employee stays home;
- Separates themselves from others;
- Monitor their health;
- Follow directions from their state and local health department.

Any employee who had been in Close Contact must Quarantine in accordance with the CDC Guidelines. A copy of these Guidelines are attached to this Packet.

### **1. Close Contact With Someone Who has COVID-19- Will Not Have Further Close Contact**

Where an employee had close contact with a Sick Person, and the employee will not have further interactions with the person while they are sick, then that employee must Quarantine. The last day of Quarantine shall be 14 days from the date the Employee had the Close Contact.

The Quarantine shall last from the date of the last Close Contact with the Sick Person plus 14 days. Employees may return to work on the 16<sup>th</sup> day after the Close Contact and subsequent Quarantine, so long as they are in Compliance with Section 5(f).

### **2. Close Contact With Someone Who has COVID-19: Lives With the Person But Can Avoid Further Close Contact**

Where an Employee had Close Contact with a Sick Person, and the Employee lives with the Sick Person but can avoid Close Contact, then that Employee must Quarantine.

The Quarantine shall last from the date the Sick person began Home Isolation plus 14 days. Employees may return to work on the 16<sup>th</sup> day after the Close Contact and subsequent Quarantine, so long as they are in Compliance with Section 5(f).

### **3. Under Quarantine and Had Additional Close Contact With Someone Who has COVID-19**

Where an Employee is in Quarantine and has another Close Contact with a Sick Person during the Quarantine, then that Employee must restart the Quarantine from the last day they had Close Contact with any Sick Person inside the Employee's Home (or space/location) used for Quarantine.

Whenever the Employee has a Close Contact with any individual with COVID-19 while in Quarantine, the Employee will need to restart the Quarantine. The Quarantine shall last from the last date of the Close Contact with the Sick Person, plus 14 days. Employees may return to work on the 16<sup>th</sup> day after the Close Contact and subsequent Quarantine, so long as they are in compliance with Section 5(f).

**4. Live With Someone Who Has COVID-19 and Cannot Avoid Continued Close Contact**

Where an Employee cannot avoid Close Contact with the Sick Person, the Employee should avoid contact with other outside of the home while the Sick Person is sick. The Employee must Quarantine.

The Quarantine shall last from the date the Sick Person ends isolation plus 14 days. Employees may return to work on the 16<sup>th</sup> day after the Quarantine, so long as they are in compliance with Section 5(f).

**(d) Employer Right to Inquire**

Federal Regulations gives NDTC authority, upon a reasonable belief, to conduct inquiries to the health of an employee as it relates to COVID-19 Symptoms, which includes taking the employee's temperature. Federal Law and the CDC afford NDTC the right to question any employee who reports feeling ill at work, or calls in sick, regarding COVID-19 Symptoms.

**(e) Employer Right to Send Employees Home**

NDTC maintains the authority to conduct the above-mentioned inquiries and send home any employee that it feels is a Direct Threat to the business, the employee themselves, the community and other employees.

A Direct Threat is an employee who poses a significant risk of substantial harm to the health or safety of the employee themselves or others that cannot be eliminated or reduced by a reasonable accommodation.

NDTC may send home an employee with COVID-19 symptoms or any symptoms associated with COVID-19. All information uncovered during these inquiries shall be kept confidential to the extent required by applicable laws.

**(f) Return to Work**

**1. Employees Diagnosed with COVID-19 – Symptomatic Employee**

Employees diagnosed with COVID-19 who had symptoms may return to work only after the following steps are completed:

- The employee completed a 14-day quarantine. **The Quarantine begins on the date that the employee first presented with symptoms.**
- The employee was symptom-free for 72 hours without using any symptom reducing medication.
- The employee presents a certification from a healthcare provider that they do not have the virus.

**2. Employee Diagnosed with COVID-19 – Asymptomatic**

Where an employee is diagnosed with COVID and does not present with symptoms, that employee may return to work only after the following:

- The employee completed a 14-day quarantine. **The Quarantine begins on the day after the date the employee presented for the positive test.**
- The employee was symptom-free for 72 hours without using any symptom reducing medication.
- The employee presents a certification from a healthcare provider that they do not have the virus.

**3. Employees in Close Contact with a Confirmed Case of COVID**

Employees who were in close contact with a Confirmed Case of COVID may return to work after the following steps are completed:

- The employee completed a 14-day quarantine.
- If the employee had symptoms, then the employee also must have been symptom free for 72 hours without using any symptom reducing medication.

#### **4. Employees Experiencing Symptoms of COVID-19**

Employees who experienced symptoms of COVID-19 may return to work after the following steps are completed:

- The employee completed a 14-day quarantine. The Quarantine begins on the date that the employee first presented with symptoms.
- The employee was symptom free for 72 hours without using any symptom reducing medication.

### **Section 5 Clinic Protocol**

#### **(a) Clinic Distancing Policy**

Maintain 6 feet away from other individuals within the office. Only one employee is allowed in any common area- for instance kitchen/snack area - at a time.

Employees must adhere to the occupancy parameters that are posted throughout the office.

##### **1. Breaks**

One Employee is permitted to the use the restroom at a time. Employees are not permitted to congregate to take breaks.

One person is permitted in the Break Area at a time. Break Area includes conference rooms, kitchens, hallways and other common areas.

Employees are prohibited from sharing food and beverages. Employees are encouraged to bring lunch from home.

#### **(b) Face Covering**

##### **1. Employees**

All Employees are required to wear a face covering at all times when on the premises. NDTC has provided face masks for every employee.

##### **2. Patients**

All Patients must wear face masks upon entering the Clinic and when inside the Clinic.

**NOTE:** Face coverings are not required for patients with sensory, cognitive, or behavioral issues. Face coverings are not required for patients with trouble breathing.

NDTC will provide a face covering for each patient and caregiver. A face covering must be worn during every session. Patients must notify NDTC if they need a face covering.

**(c) Laundered Clothing**

At the end of each work day, employees must launder their clothes after each use using the warmest appropriate water setting for the items and dry them completely. Employers must wear laundered clothes each day to work. Employees cannot wear clothes that have been worn before and not laundered since.

**(d) Handwashing and Hand Sanitizing**

Each employee must sanitize their hands per CDC guidelines: (1) before and after eating, (2) after sneezing, coughing or nose blowing, (3) after using the restroom, (4) before handling food, (5) after touching or cleaning surfaces that may be contaminated; or (6) after using shared equipment and supplies like electronic equipment including but not limited to, iPads, keyboards, mice and phones.

**(e) Employee Clinic Cleaning Protocol**

Each Clinic Employee has access to the following:

- Hand Sanitizer
- Disinfectant Wipes
- Paper Towels
- Tissues
- Disinfectant Spray

Using the above cleaning materials, Clinic Employees must do the following upon (1) arriving at the Clinic, (2) before each appointment, (3) after each appointment, and (4) when leaving the clinic at the end of the day. Clinic employees must sanitize:

- Handles to doors
- Mat table
- Chairs
- Any equipment that will be/was used during the appointment
- iPads

- Any other equipment used or surfaces touched during the day
- Mobile Phone
- Office phone

After each use of the bathroom, the faucets, toilet seat, door knob and sink must be wiped down.

**(f) Self-Screening**

Every day, all employees must complete the COVID Self-Screening Form found in Credible Forms. Employees must abide by the instructions in the Credible Forms and adhere to the guidance from Human Resources.

**(g) Respiratory Hygiene**

Employees must cover their coughs and sneezes with tissues or the corner of their elbow. Employees are required to dispose of soiled tissues immediately after use.

**(h) Exposure of a Confirmed or Suspected Case of COVID**

**1. Disinfect Premises**

In the event that the Clinic been exposed to a probable or confirmed case of COVID-19:

- The areas visited by the individual must be closed off.
- To the extent practicable, doors and windows shall be open, and if feasible, ventilation fans shall be employed.
- NDTC shall wait 24 hours, or as long as practicable, before disinfection and cleaning
- NDTC will clean and disinfect the facility focusing especially on areas frequented by the individual who is a confirmed or suspected case of COVID-19.

**2. Probable Case of COVID-19: Identify Individuals in Close Contact**

NDTC will identify employees who were in Close Contact (within 6 ft. for at least 15 minutes) with the individual who was a probable or confirmed case of COVID.

**Asymptomatic employees** must adhere to the practices set forth in Section 4(b).

If an employee becomes sick during the workday, NDTC will send them home immediately. Employees are expected to self-monitor themselves throughout the day.

NDTC will clean and disinfect all areas where the employee worked.

NDTC will identify all individuals with whom the sick employee had Close Contact (within 6 ft. for at least 15 minutes) during the time the employee had the symptoms and 48 hours prior to the symptoms.

**NOTE:** Other individuals shall be notified pursuant to Section 12 of this Policy.

**3. Confirmed Case of COVID-19 – Identify Individuals in Close Contact**

NDTC will identify employees who were in Close Contact (within 6 feet for at least 15 minutes) with the Individual who was a confirmed case of COVID.

Any identified employee must adhere to the Self Quarantine protocol in Section 4(c).

**(i) Clinic Patient Protocol – Prior to the Day of the Appointment**

1. NDTC shall attempt to contact each patient who has an appointment at the Clinic at least one (1) day before the appointment. (NOTE: If the appointment is on a Monday, then NDTC shall contact the patient the prior Friday.)

NDTC will remind the patients via telephone or e-mail the following:

- (i) NDTC will remind the patient at least one day prior to the appointment, and remind the patient of the screening requirements.

**(j) Visitor Policy**

1. **Employee Visitor Policy**

Employees are not permitted to have any visitors at the Clinic at any time.

**2. Clinic Patient Visitor Policy**

Patients are not allowed to have any visitors while at the Clinic. The only visitors/guests that a Patient may have while at the Clinic are those individuals who are essential for the Patient's physical or emotional well-being and care.

All visitors must present for screening before entering the Clinic, and abide by the terms of this policy.

**(k) Patient Access to Clinic**

**1. Patient Notification of Arrival**

Patients are prohibited from entering the Clinic until they have been greeted by a representative from NDTC.

**2. NDTC Greet and Screen**

Prior to the Patient entering the premises, a NDTC representative shall greet the Patient, while maintaining social distance as discussed in Section 5(a). The NDTC representative will conduct a screening by asking the patient questions included in the Patient Screening Protocol.

- If a Patient responds "Yes" to any questions during the Patient Screening, the Patient will be restricted from entering the Clinic.
- If a Patient responds "Yes" to any questions during the Patient Screening, the Patient will not incur any charges for the visit.
- If the Patient responds "Yes" to having symptoms, a representative from NDTC shall recommend that they call their Primary Care Physician for further direction.

**(l) Patient Return for Care After Experiencing COVID-19 Symptoms or a COVID-19 Diagnosis**

Patients are not permitted to return for care until they have quarantined for 14 days, and they have been symptom free for 72 hours without using any symptom-reducing medication. Additionally, Patients must also present a certification from a Health Care Provider that they do not have the virus.



**(m) Confidentiality**

Each screening document and the information provided therein shall be stored in accordance with the applicable state and federal laws governing confidentiality.

**(n) Scheduling Protocol**

All Clinic appointments shall be conducted and scheduled to ensure that social distancing can be maintained, and to allow sufficient time for sanitizing between appointments.

**Section 6 Office Employee Protocol**

**(a) Clinic Distancing Policy**

Maintain 6 feet away from other individuals within the office. Only one employee is allowed in any common area- for instance kitchen/snack area - at a time.

In person meetings cannot exceed ten (10) people, and must maintain social distancing.

Employees must adhere to the occupancy parameters that are posted throughout the office, include foot traffic signals.

**1. Breaks**

One Employee is permitted to the use the restroom at a time. Employees are not permitted to congregate to take breaks.

One person is permitted in the Break Area at a time. Break Area includes conference rooms, kitchens, hallways and other common areas.

Employees are prohibited from sharing food and beverages. Employees are encouraged to bring lunch from home.

**(b) Face Covering**

All Employees are required to wear a face covering at all times when on the premises. NDTC has provided face masks for every employee. Office Employees must wear a face covering when they are engaged in work and interacting in-person with any member of the public, working in any space visited by members of the public, working in or walking through common areas, or in any room or enclosed area where other people are present an unable to physically social distance. If a

medical condition exists, staff may request to use a face shield by completing the face shield request form in Credible.

**(c) Laundered Clothing**

At the end of each work day, employees must launder their cloths after each use using the warmest appropriate water setting for the items and dry them completely. Employers must wear laundered clothes each day to work. Employees cannot wear clothes that have been worn before and not laundered since.

**(d) Handwashing and Hand Sanitizing**

Each employee must sanitize their hands: (1) before and after eating, (2) after sneezing, coughing or nose blowing, (3) after using the restroom, (4) before handling food, (5) after touching or cleaning surfaces that may be contaminated; or (6) after using shared equipment and supplies like electronic equipment including but not limited to, iPads, keyboards, mice and phones.

**(e) Employee Office Cleaning Protocol**

Each Office Employee has access to the following:

- Hand Sanitizer
- Paper Towels
- Tissues
- Disinfectant Spray

Using the above cleaning materials, Clinic Employees must do the following upon (1) arriving at the Clinic, (2) before each appointment, (3) after each appointment, and (4) when leaving the clinic at the end of the day. Clinic employees must sanitize:

- Handles to doors
- Chairs
- Computer Keyboard
- Desktop
- iPads
- Any other equipment used or surfaces touched during the day
- Mobile Phone
- Office phone

After each use of the bathroom, the faucets, toilet seat, door knob and sink must be wiped down.

**(f) Self-Screening**

Every day, all employees must complete the COVID Self-Screening Form found in Credible Forms. Employees must abide by the instructions in the Credible Forms and adhere to the guidance from Human Resources.

**(g) Respiratory Hygiene**

Employees must cover their coughs and sneezes with tissues or the corner of their elbow. Employees are required to dispose of soiled tissues immediately after use.

**(h) Exposure of a Confirmed or Suspected Case of COVID**

**1. Disinfect Premises**

In the event that the Clinic been exposed to a probable or confirmed case of COVID-19:

- The areas visited by the individual must be closed off.
- To the extent practicable, doors and windows shall be open, and if feasible, ventilation fans shall be employed.
- NDTC shall wait 24 hours, or as long as practicable, before disinfection and cleaning
- NDTC will clean and disinfect the facility focusing especially on areas frequented by the individual who is a confirmed or suspected case of COVID-19.

**2. Probable Case of COVID-19: Identify Individuals in Close Contact**

NDTC will identify employees who were in Close Contact (within 6 ft. for at least 15 minutes) with the individual who was a probable or confirmed case of COVID.

**Asymptomatic employees** must adhere to the practices set forth in Section 4(b).

If an employee becomes sick during the workday, NDTC will send them home immediately. Employees are expected to self-monitor themselves throughout the day.

NDTC will clean and disinfect all areas where the employee worked.

NDTC will identify all individuals with whom the sick employee had Close Contact (within 6 ft. for at least 15 minutes) during the time the employee had the symptoms and 48 hours prior to the symptoms. **NOTE:** Other individuals shall be notified pursuant to Section 12 of this Policy.

**3. Confirmed Case of COVID-19 – Identify Individuals in Close Contact**

NDTC will identify employees who were in Close Contact (within 6 feet for at least 15 minutes) with the Individual who was a confirmed case of COVID.

Any identified employee must adhere to the Self Quarantine protocol in Section 4(c).

**(i) Visitor Policy**

Only essential visitors are permitted on the premises. All Visitors must complete a Visitors Screening Form before entering the Office. In-Person meetings must be limited to 10 people and must maintain social distancing.

**(j) Confidentiality**

Each screening document and the information provided therein shall be stored in accordance with the applicable state and federal laws governing confidentiality.

**Section 7 Field Employee Protocol- In-Home Services**

**Field Employees include, but not limited to, Blended Case Managers, Mobile Mental Health Therapists, Mental Health Workers and Mental Health Professionals**

**(a) Laundered Clothing**

At the end of each work day, employees must launder their cloths after each use using the warmest appropriate water setting for the items and dry them completely. Employers must wear laundered clothes each day to work. Employees cannot wear clothes that have been worn before and not laundered since.

**(b) Self-Screening**

Every day prior to leaving the home, employees must complete the COVID Self-Screening Form found in Credible Forms. Employees must

abide by the instructions in the Credible Forms and adhere to the guidance from Human Resources.

**(c) Social Distancing Policy**

Field Employees are required to maintain 6 feet away from other individuals within the home, except when (1) working with a patient, and (2) training caregivers.

Therapists must notify the Pandemic Safety Officers immediately of any violations of this policy, and must immediately leave the premises upon such violations. If the session is being conducted outside or at a location other than the Patient's home, the Field Employee must immediately end the session.

**(d) Respiratory Hygiene**

Employee must cover their coughs and sneezes with tissues or the corner of their elbow. Employees are required to dispose of their tissues immediately after use.

**(e) Face Covering**

**1. Employees**

All Employees are required to wear a face covering **AT ALL TIMES** when inside a Patient's Home. NDTC has provided face masks for every employee.

"Face covering" means a covering of the nose and mouth that is secured to the head with ties, straps, or loops over the ears or is wrapped around the lower face. "Face coverings" may be factory made, sewn by hand or be improvised from household items, including but not limited to scarfs, bandanas, t-shirts, sweatshirts, or towels. Information regarding face coverings is attached to this policy.

**2. Patients**

If possible, all Patients must wear face masks during the therapy session.

**NOTE:** Face coverings are not required for individuals who cannot wear a mask due to a medical condition, including those with respiratory issues that impede breathing, mental health conditions or disability; individuals who would be unable to remove a mask without assistance; individuals who are

communicating or seeking to communicate with someone who is hearing- impaired or has another disability, where the ability to see the mouth is essential for communication. Individuals are not required to show documentation that an exception applies. Caregivers participating in the therapy session must wear a face covering. Caregivers who do not wear masks are not permitted to participate in the therapy session.

**(f) Handwashing and Hand Sanitizing**

NDTC provides hand sanitizer to all Field Employees. Each employee must sanitize their hands: (1) Prior to entering the Patient's Home.

**(g) Field Employee Protocol**

**1. Pre-Appointment Notification**

**(h)** NDTC will call the patient at least one hour prior to the appointment, and conduct the Patient Screening Protocol as included in the Patient Screening Form.

- If a Patient responds "Yes" to any questions during the Patient Screening, the session will not take place.

**Confidentiality** Each screening document and the information provided therein shall be stored in accordance with the applicable state and federal laws governing confidentiality. Therapists will save the Patient Screening Document in the Patient's file.

**If the Patient Answers "No" to all Screening Questions:** Employee will remind the Patient that they must wear face covering, unless the Patient has notified NDTC of their inability to wear a face covering.

Employee will remind the Patient of the Social Distancing Policy, whereby Therapist must maintain 6 ft from all individuals except for the patient, and caregivers who participate in the therapy session.

NOTE: Patient must inform NDTC of any reasons that prohibit their ability to wear a face covering.

## **2. Therapy Session Protocol**

Prior to entering the home, the Field Employee must put on a mask, and sanitize their hands.

If possible, the Field Employee must sanitize the chair in which the Field Employee will be sitting.

During the session, the Field Employee must maintain 6 feet away from all individuals in the Home.

If possible, after the session, the Field Employee must sanitize all areas that were touched by the Field Employee.

NOTE: When feasible, Field Employees must conduct session outdoors.

### **(i) Patient Return for Care After Experiencing COVID-19 Symptoms or a COVID-19 Diagnosis**

Patients are not permitted to return for care until they have quarantined for 14 days, and they have been symptom free for 72 hours without using any symptom-reducing medication.

## **Section 8 New Clients/Referrals**

The following Protocol must be followed for every new client/referral:

- (a)** NDTC shall conduct a Patient Screening.
- (b)** If the Patient answers “Yes” to having symptoms, then:
  - 1.** Patients are not permitted to commence services until they have quarantined for 14 days, and they have been symptom free for 72 hours without using any symptom-reducing medication. Additionally.
  - 2.** Patients must also present a certification from a Health Care Provider that they do not have the virus.
- (c)** If the Patient has COVID-19, then the Patient must:
  - 1.** Patients are not permitted to commence services until they have quarantined for 14 days, and they have been symptom free for 72 hours without using any symptom-reducing medication. Additionally.

2. Patients must also present a certification from a Health Care Provider that they do not have the virus.

## **Section 9 Contact Tracing/Notification of Exposure**

NDTC shall act in accordance with the guidance from the Office of Civil Rights (“OCR”) and the U.S. Department of Health and Human Services (“HHS”), along with all applicable federal laws regarding disclosing private health information (PHI) relating to a COVID-19 diagnosis.

### **(a) Protocol – Patient Diagnosis**

In the event a patient is diagnosed with COVID-19, the following protocol must be implemented:

1. **Employee contact the Pandemic Safety Officers immediately and provide the following information:**
  - (i) Name of Patient
  - (ii) Name and contact information of individuals identified in the Patient’s care team

### **(b) Protocol – Therapist/Employee Diagnosis**

In the event a NDTC employee is diagnosed with COVID-19 (“Sick Employee”), the following protocol must be implemented:

1. Contact a Pandemic Safety Officer immediately.
2. Do not go to any patient’s homes or the clinic.
3. NDTC will notify any Patients with whom the Therapist has worked.
4. NDTC will identify any other NDTC employees with whom the Therapist has had close contact, and notify them of the exposure. NOTE: When notifying other NDTC employees, NDTC shall maintain confidentiality, and not disclose the Sick Employee’s name.

### **(c) Protocol – NDTC Patient Diagnosis**

1. NDTC shall notify the appropriate individual and provide such notifications in a manner that is in accordance with applicable laws.



2. NDTC will contact the Patient diagnosed with COVID-19 (“sick person”), and request permission to notify the appropriate individuals of their diagnosis, which would include providing the sick person’s name.

**NOTE:** The Office of Civil Rights, the U.S. Department of Health and Human Services directs that covered entities are allowed to disclose Private Health Information (“PHI”) without an individual’s authorization. Federal Law allows for covered entities to disclose PHI relating to a patient’s COVID diagnosis to (1) a public health authority, and (2) people at risk.

3. Federal Law allows covered entities to share PHI with a patient’s family members, relatives, friends, or others involved in the patient’s care, among others. The Federal Regulations, and related Guidance allow NDTC to share a COVID-19 diagnosis with anyone “as necessary to prevent or lessen a serious and imminent threat to the health and safety of a person or the public.”

## **Section 10 Remote Work**

Employees working remotely must abide by the following policy. NDTC has the right to cancel or suspend employee telework arrangements at any time, for any reason, or for no reason. This policy does not entitle employees to telework after the Centers for Disease Control and Prevention (CDC) determines that the global pandemic has ended.

### **(a) Eligibility**

Employees who are eligible for telework have been notified by a Member of the Management Team.

### **(b) Equipment/Furnishing/Office Supplies**

Employees are required to use NDTC issued or approved equipment for telework. If equipment fails, employees should notify their managers immediately. NDTC does not provide office furnishings- such as desks, chairs, file cabinets, and lighting for employees who are teleworking.

### **(c) Data Security**

Employees must comply with NDTC data security and confidentiality policies and procedures while teleworking. Failure to follow security policies and procedures will result in discipline up to and including termination.

**(d) Reasonable Accommodations**

Reasonable accommodations are available for the known physical or mental limitations of qualified employees with disabilities. NDTC is committed to providing accommodations so long as accommodations do not place an undue hardship on business operations or pose a threat to the health or safety of employees.

Employees who were receiving an accommodation before this policy became effective, and employees who need a new accommodation in accordance with Title VII, the ADA and other applicable laws.

**(e) Clinic Access**

Remote Employees who need to access the Office to collect documents, materials or supplies are allowed to do so on a case by case basis. This access should occur minimally and not with frequency.

Employees Accessing the Clinic must adhere by the Clinic Protocol outlined in Section 5.

**(f) Employee Screening**

All staff must complete the COVID Self-Screening Form any time symptoms appear or develop, regardless of intent to visit an office or meet with someone face to face. Employees must abide by the instructions in the Credible Forms and adhere to the guidance from Human Resources.

**Section 11 Meeting Policy**

All meetings, to the extent feasible, must be conducted virtually. Any meetings occurring in person must adhere to the Social Distancing Policies explained in Sections 5 and 6 of this Packet.

**Section 12 Discipline**

Failure to comply with any provisions of this Packet may result in discipline up to and including termination.

**Section 13 Discrimination Prohibited**

NDTC provides a safe, non-intimidating, non-discriminatory, productive work environment and complies with all applicable anti-harassment and anti-discrimination laws and rules. No one will be subject to and NDTC prohibits any form of intimidation or retaliation.