



## **COVID-19 HEALTH AND SAFETY PLAN**

Prepared: June 17, 2021

Revision: 11/9/2021, 01/18/22, 6/6/22, 8/22/22

**COVID-19 Coordinator (s):** Roberta Kelly, CNO; Carlos Ortiz, Deputy COO; Allison Dubois, COO; Greg Gast, Chief of HR

Sun River Health takes the health and safety of our employees seriously. We are committed to reducing the risk of exposure to COVID-19 and we provide a healthy and safe workplace for our employees, patients, and guests.

Sun River 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).

Our plan is based on information and guidance from the NYS Department of Health, Centers for Disease Control (CDC) and the Occupational Health and Safety Administration (OSHA) at the time of its development. Because the COVID-19 situation is frequently changing, the need for modifications may occur based on further guidance provided by the CDC, OSHA, and other public officials at the state or local levels. The New York Health and Essential Rights Act (NY HERO Act) was signed into law on May 5, 2021. The law mandates extensive new workplace health and safety protections in response to the COVID-19 pandemic. The purpose of the NY HERO Act is to protect employees against exposure and disease during a future airborne infectious disease outbreak. This COVID-19 Health and Safety Policy reflects requirements in prevention of spread of COVID-19.

Sun River 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 or Program	Workplace COVID-19 Specific Considerations
Sun River Health Administrative Locations <ul style="list-style-type: none"> <li>• 1200 Brown Street, Peekskill, NY, 10566</li> <li>• 71 West 23<sup>rd</sup> Street, NY, NY, 10010</li> <li>• 55 S. Broadway, Tarrytown, NY 10591</li> </ul>	Non-clinical locations; Masking protocols follow the most recent CDC, State or Local recommendations (see appendix A)
Adult Day Health Care Program	Programs co-located with Ambulatory Care services: NYS specific requirements for COVID19 testing among clients prior to program admission

**Note: Sun River Health may amend this Plan based on changing requirements and the needs of our business.**

**EMPLOYEE RISK STRATIFICATION**

Our employees fall into one or more of the following categories as defined by OSHA:

1. Tier 1- Lower exposure risk (the work performed does not require direct contact with people known or suspected to be infected with COVID-19 or frequent close contact with the public).

2. Tier 2- Medium exposure risk (the work performed requires frequent and/or close contact with people who may be infected with COVID-19, but who are not known COVID-19 patients, or contact with the general public in areas where there is ongoing community transmission).
3. Tier 3- High exposure risk (Jobs with a high potential for exposure to known or suspected sources of SARS-CoV-2. Examples of workers in this category include: Healthcare delivery and support staff exposed to known or suspected COVID-19 patients).

Risk Category	Role
<b>Tier 1*</b>	CHASI CWAHA Brightpoint Lab Offsite care managers Billing staff Administrative staff Community engagement*
<b>Tier 2</b>	Navigators Patient representatives Social workers Onsite managers Onsite care managers Facilities staff Transportation staff
<b>Tier 3</b>	Anyone doing COVID-19 testing Urgent care clinical staff Employee Health Dental Providers (providing on-site services) Registered Nurses LPN's Medical Assistants

**Table 1.**

\*Staff in this category that are located within clinical settings (Health Center's) are Tier 2

**COVID-19 WORKPLACE COORDINATORS**

Sun River Health has designated the following staff as its COVID-19 Workplace Coordinators, in conjunction with Sun River Health's Safety and Standards Committee:

Roberta Kelly, FNP-BC, CIC, Chief Nursing Officer ([rkelly@sunriver.org](mailto:rkelly@sunriver.org))- Chair, Safety Standards Committee

Carlos Ortiz, Deputy Chief Operating Officer ([cortiz@sunriver.org](mailto:cortiz@sunriver.org))- Environment of Care, Facilities

Allison Dubois, Chief Operating Officer and Executive Vice President ([adubois@sunriver.org](mailto:adubois@sunriver.org))

Greg Gast, Chief of Human Resources ([ggast@sunriver.org](mailto:ggast@sunriver.org))

The coordinators responsibilities include:

- staying up to date on federal, state and local guidance
- incorporating those recommendations into our workplace
- training our workforce on control practices, proper use of personal protective equipment, the steps employees must take to notify our business of any COVID-19 symptoms or suspected cases of COVID-19.
- reviewing HR policies and practices to ensure they are consistent with this Plan and existing local, state, and federal requirements

**Note: Safety and Standards Committee membership includes representation from all departments of Sun River Health.**

### **Responsibilities OF Sun River Health Supervisors and Managers**

All Sun River Health managers/supervisors must be familiar with this Plan and be ready to answer questions from employees or clients. Additionally, Sun River Health expects that all managers/supervisors will set a good example by following this Plan. This includes practicing good personal hygiene and jobsite safety practices to prevent the spread of the virus. Managers and supervisors must encourage this same behavior from all employees.

## **HEALTH AND SAFETY PREVENTIVE MEASURES**

Sun River Health has put several best practices and measures in place to ensure the health and safety of employees. With each Tier of employees, our plan is focused on three lines of defense – limiting the number of people together at a time, cleaning and disinfection, and requiring appropriate personal protection equipment. Capacity restrictions and physical distancing are maintained through encouragement of limited face-to-face meetings, use of virtual platforms, and telemedicine.

### **OSHA and CDC Prevention Guidelines**

Sun River Health conducts regular reviews of most updated OSHA and CDC recommendations. Sun River Health Safety and Standards Committee reviews recommendations monthly and conducts interim meetings to address urgencies.

### **Screening**

Sun River Health will require employee, patient, client, and visitor screening for SARS-COV2 at all business entry points in accordance with local and federal mandates and recommendations. A log record of all employee screenings will be maintained.

- Patient care locations will screen all entrants for signs and symptoms of COVID-19. Sun River Health isolation protocols are applied for all presenting with suspected or confirmed COVID-19.
- Administrative locations screen unvaccinated staff at all entry points. Sick employees will not report on-site and remain with remote working options. No staff that presents with suspected or confirmed COVID-19 are allowed on-site. Staff are referred to Employee Health Services for consultation and guidance.
- Sun River Health will follow state and federal guidance for return-to-work guidance.

- Patients undergoing elective procedures conducted in hospitals with have pre-operative COVID-19 testing, in accordance with applicable New York State Requirements.

### Contact Tracing

Should an employee of HRHCare have a positive COVID-19 test, the following process will be followed.

- Health Center or Site leadership will confidentially share exposure information to staff at the location in which the positive employee was employed. This will be via a team meeting, keeping safe spacing requirements in mind, or via email notice.
- Sun River Health will provide verbal and written education on symptom monitoring and offer testing at no cost. They will be encouraged to contact Employee Health Services for any additional questions or concerns.
- Sun River Health will follow the most recent NYS guidance on monitoring at least every 12 hours for fever and other symptoms during their shift. All positive exposures will be reported internally to human resources and the Infection Prevention and Control Department under the Chief Nursing Officer for tracking.
- Contact tracing will follow the New York State Department of Health guidance.

### Environmental Controls

- In lieu of MERV-13 filter upgrade, Sun River extended operating times to optimize fresh air intake/air changes and increase MERV 8/11 filter changes from quarterly cycle to bi-monthly.
- Installation of Acrylic/Plexiglass Sneeze Guards and safety barriers
- Limiting swipe access at doors so that staff cannot bypass temperature taking at sites front entrance.
- Environmental filtration systems. Optimized Use of Engineering Controls and Indoor Air Quality
- Plexiglass barriers in patient reception areas
- Signage
- Physical Distancing during high-level community transmission: Keep everyone on the worksite premises at least six feet from one another to the maximum extent possible, inclusive of using ground markings, signs, and physical barriers, as appropriate to the worksite. Sun River Health follows current guidance for healthcare facilities or administrative locations in accordance with local and State issued guidance.
- Capacity assessments and limitations by site and space. Capacity signage are posted in meeting/gathering locations.
- Protocols in effect to clean and disinfect the facility in the event of a positive COVID-19 case in the workplace
- Increase facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (e.g., door handles), paying special attention to parts, products, and shared equipment (e.g., tools, machinery, vehicles).
- Maintenance of site-specific cleaning logs and reports

- Cleaning supplies made available to employees at the worksite
- Installation of additional hand sanitizing units

**Note: Refer to specific EOC Hazard Assessment and Infection Prevention and Control Program attached to this Safety Plan.**

### **Personal Protective Equipment\***

- Sun River Health provides non-medical grade face coverings to their employees, with supplies of N95 masks and surgical masks reserved for health care professionals.
- Sun River Health requires face coverings to be worn at administrative locations by all unvaccinated personnel. Requires all staff at clinical locations wear appropriate face covering when on-site, regardless of vaccination status.
- Staff may voluntarily wear 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 in clinical settings, we 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.
- For aerosol-generating procedures (AGPs) on a person with suspected or confirmed COVID-19, Sun River 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). Sun River 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). AGP's are not conducted on patients that are suspected or confirmed to have COVID-19 at Sun River Health.
- Sun River Health follows CDC, OSHA, and NYS guidance about Personal Protective Equipment (PPE) standards for use
- Clinical staff that are conducting high risk medical procedures such source COVID-19 suspect testing are required to use N95 respirators or higher and are participating in our Respiratory Protection Program.
- Employees have been tiered based on exposure risk and issued appropriate Sun River Health issued PPE (See Appendix B).
- PPE allocations are monitored closely during crisis capacity settings (ie: pandemics) for contingency protocols as recommended by the CDC.

\*Sun River Health may adapt PPE recommendations based on community transmission rates and/or state or federal recommendations to a higher standard. This may include implementation of OSHA's mini respiratory protection program under 29 CFR 1910.504

***Sun River 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.***

### **Employee Health**

- Staff are advised that if they develop a fever and symptoms of respiratory illness, such as an atypical cough or shortness of breath, do not report to work. Manager must be notified immediately and consult with Employee Health Services. Similarly, if employees come into close contact with someone showing these symptoms, they must notify their supervisor immediately and consult Employee Health Services.
- Positive cases of COVID-19 among staff will be tracked and maintained within Human Resources Department.

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

Sun River 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., urgent care facilities, COVID-19 testing sites). When Sun River 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, Sun River 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 will include the date(s) and that they were in close contact with someone with COVID-19.**
- **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 will 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 specifies 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. Notifications will come via electronic communication, and direct management. Sun River Health offers COVID-19 post exposure screening to employees at no cost.

***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.***

### **Medical Removal from the Workplace**

Sun River Health has also implemented a policy for removing employees from the workplace in certain circumstances. **Sun River 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; or**
- **The employee is experiencing other respiratory symptoms in which COVID-19 has not been excluded.**

For employees removed because they are COVID-19 positive, Sun River Health will keep them removed until they meet the return-to-work criteria in accordance to state or federal recommendations.

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

Sun River 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, Sun River Health will pay employees the equivalent of their regularly scheduled hours worked during a pay period for up to three (3) orders of quarantine or isolation. Provided two of the three orders of quarantine are based upon an employee’s positive COVID-19 test. Employees who have been exposed to a confirmed case of COVID-19, but have the ability to work remotely, are not eligible for the COVID-19 pay continuance.

Sun River 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.

### **Minimizing exposure from patients**

- Nursing triage line available through Sun River Health call center to identify patients with suspected or confirmed COVID-19.
- Telehealth options available
- Isolation policy in place at all medical health center locations

## **TRAINING**

Sun River Health has implemented policies and procedures for employee training as part of a multi-layered infection control approach. Sun River 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.

Sun River Health’s COVID-19 training program will be accessible in the following ways:

- Relias Learning Platform: Courses are assigned by role/department/discipline.
- Staff Meetings/inter-departmental meetings/virtual learning sessions



Sun River Health ensures 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;
  - Sun River 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;
  - Sun River 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;
  - Sun River 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 Sun River Health’s Safety Coordinator(s) specified in this COVID-19 plan;
- OSHA’s COVID-19 standards; and
- How the employee can obtain copies of OSHA’s requirements and any employer-specific policies and procedures developed, including this written COVID-19 plan.

Sun River Health ensures 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.

Sun River 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.

## COMMUNICATION

Sun River Health communicates health and safety changes to all employees through intranet, email, and emergency mass texting platforms.

Employee health and safety questions or concerns are directed to our Employee Health Services Department via a direct hotline or protected email.

New York Forward Safety Plan and related policies and procedures can be downloaded from any location using our QR code.

## SARS-COV2 VACCINATION

COVID-19 vaccinations are offered to all new and existing employees at no cost. Sun River Health requires all staff, on-site contractors, and vendors to maintain COVID-19 vaccination status in accordance with applicable state and/or federal requirements. Sun River Health provides accommodations for medical exemptions, as well as conditional deferrals in accordance with New York State and CDC guidelines or requirements. Vaccine records are maintained by Employee Health Services. Medical information is kept confidential under HIPPA compliance guidelines. Employee vaccination data reports are maintained in compliance with NYS Department of Health Reporting requirements.

## ANTI-RETALIATION

Sun River Health will inform each employee that employees have a right to the protections required by OSHA, and that employers are prohibited from discharging or in any manner discriminating against any employee for exercising their right to protections required by OSHA, or for engaging in actions that are required by OSHA.

Sun River Health will not discharge or in any manner discriminate against any employee for exercising their right to the protections required by OSHA, or for engaging in actions that are required by OSHA.

Sun River Health will comply with the provisions of OSHA at no cost to its employees, with the exception of any employee self-monitoring conducted under the Health and Safety Preventive Measures section of this Plan.

## RECORD KEEPING

Sun River Health will retain all versions of this COVID-19 plan implemented to comply with OSHA COVID-19 regulations while they remain in effect.

Sun River Health maintains 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.

This information is maintained with Sun River Health's Human Resources Department.

Sun River Health will record the information on the COVID-19 log within 24 hours of learning that the employee is COVID-19 positive. Sun River Health will maintain the COVID-19 log as a confidential medical record and will not disclose it except as required by OSHA or other federal law.

Sun River 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, Sun River Health will provide, for examination and copying:

- All versions of the written COVID-19 plan to all 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

Sun River Health will report to OSHA:

- Each work-related COVID-19 fatality within 8 hours of Sun River Health learning about the fatality;

- Each work-related COVID-19 in-patient hospitalization within 24 hours of Sun River Health learning about the in-patient hospitalization.

**COORDINATION WITH OTHER EMPLOYERS**

Sun River 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. Departmental heads are accountable to sharing this plan and any changes to this plan with sub-contracted vendors or other employers with staff on-site.

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

Sun River Health has identified below all other employers to coordinate with to ensure employees are protected.

<b>Other Worksite Employers</b>	
<b>Employer Name/Employer Representative:</b>	<b>Contact Information:</b>
Tasty Enterprises/Rich Daggett/NYC	917-592-0821
UMG Cleaning/Frank C Trotta III/NYC	212-228-3226
World Class Security/Luis Rivera/NYC	347-342-8671
Freedom Pest Control/Cesar DeSoto/NYC	646-748-5501
LCS Facility Group/HV	845-485-7000
Western Pest Services/Mike Blume/HV	347-420-3423
Murfco Maintenance/Owen Wildberger/Suffolk	631-365-6309
Colony Pest Management, Inc/Joseph Mcswiggan/Suffolk	718-856-1400

**MONITORING EFFECTIVENESS**

Sun River 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 to ensure ongoing progress and efficacy.

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

**ENTERING RESIDENCES**

Sun River Health will identify potential hazards and implement measures to protect employees who, in the course of their employment, enter private residences and other physical locations controlled by a person not covered by the Occupational Safety & Health Act of 1970 (OSH Act). Sun River Health requires that Sun River Health COVID-19 protocols be communicated to homeowners and sole proprietors prior to conducting work activities at private residences or other physical locations not covered by the OSH Act.

Sun River Health has identified below all other employers to coordinate with to ensure employees are protected.

<b>Other Worksite Employers</b>	
<b>Employer Name / Employer Representative:</b>	<b>Contact Information:</b>
Preservation Company	

<b>SIGNATURE AND PLAN AVAILABILITY</b>
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Sun River Health has prepared and issued this COVID-19 plan on June 17, 2021 with revisions outlined in the title page of this document.

<b>Employer Name:</b>	<b>Sun River Health</b>
<b>Address:</b>	<b>1200 Brown Street, Peekskill NY 10566</b>
<b>Business Owner:</b>	<b>Anne Nolon, CEO</b>

This COVID-19 plan is available:

<p>✓ Via hard copy at 1200 Brown Street, Peekskill NY 10566</p>	<p>✓ Posted to Sun River Health intranet, external QR code scan</p>	<p>✓ Available by request. Employees may request a copy to be produced by next business day by emailing <a href="mailto:employeehealth@sunriver.org">employeehealth@sunriver.org</a>.</p>
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**SIGNATURES**

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Roberta Kelly, CNO

Allison Dubois, COO

Anne Nolon, CEO

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# COVID-19 Safety and Response Plan

To view Sun River Health's COVID-19 Safety and Response Plan, use the QR code below or visit:

[sunriver.org/covid-19-safety-and-response](https://sunriver.org/covid-19-safety-and-response)

