| **Valley Senior Living’s** **COVID-19 Plan** |
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1. **Purpose and Scope**

Valley Senior Living (VSL) is committed to providing a safe and healthy workplace for all our employees. VSL 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 Healthcare Emergency Temporary Standard (ETS).

VSL 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** |
| --- | --- |
| Valley Senior Living on Columbia | As a skilled nursing facility, there are COVID-19 related CMS requirements for residents and staff in addition to OSHA. |
| Valley Senior Living on 42nd | Woodside Village (including Town Square) is a skilled nursing facility which has COVID-19 related CMS requirements for residents and staff in addition to OSHA. Wheatland Terrace is an assisted living with additional state COVID-19 suggested guidelines. Country Estates is an independent apartment building and is not subject to the OSHA ETS requirements for healthcare. |
| Valley Senior Living on Cherry | Tufte Manor, the basic care facility, has additional state COVID-19 suggested guidelines. Cherrywood Village is an independent apartment building and is not subject to the OSHA ETS requirements for healthcare. |

Since this plan was adopted in July 2021, there have been, and continue to be significant changes in CDC guidance which make a number of the statements in the following plan out of date. During the period of time in between the expiration of the original ETS and when a final rule will be issued, VSL will follow revised CDC guidance when the specifics of this plan that are in conflict with the newer guidance.

1. **Roles and Responsibilities**

VSL’s goal is to prevent the transmission of COVID-19 in the workplace(s). Managers, 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 VSL’s full support in implementing and monitoring this COVID-19 plan, and has the authority to ensure compliance with all aspects of this plan.

VSL 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.

VSL will seek the input and involvement of employees in the development of the COVID-19 plan through an all staff informational session. Employee concerns and suggestions will be integrated into the development, implementation, monitoring, and updating of the plan during a formal review at facility level safety committees.

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| --- | --- | --- |
| **COVID-19 Safety Coordinator(s)** | | |
| **Name** | **Title/Facility Location** | **Contact Information (office location, phone, email address)** |
| Samantha Jallo | Safety Director  Valley on Columbia | 701-787-7971  sjallo2@valleyseniorliving.org |
| Carra Hindberg | Infection Preventionist  Valley on 42nd | 701-787-7839  chindberg@valleyseniorliving.org |
| Jacinda Nelson | Care Coordinator  Tufte Manor | 701-787-7611  jnelson@valleyseniorlivng.org |

1. **Hazard Assessment and Worker Protections**

VSL 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).

VSL 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:

* Any office, conference room, designated break room, or vehicle with only fully-vaccinated staff and no residents are present.

VSL has developed the following policies and procedures to determine employees’ vaccination status: Human Resources tracks the vaccination status of all staff and distributes a community level list of staff who are fully-vaccinated to supervisors on a routine basis to implement safe use of designated spaces within the facility.

VSL 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.

VSL 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.

***Screening and Management***

In settings where direct patient care is provided, VSL 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
* Encourage the use of telehealth services where available and appropriate in order to limit the number of people entering the workplace.

VSL monitors each designated point of entry to the setting through active screening for COVID-19 which includes, but is not limited to: fever, symptoms of COVID-19, contact with someone with confirmed or suspected COVID-19, and recent travel. VSL may restrict facility access based upon screening responses or to reduce crowding (e.g., limiting visitors to only those essential for the patient’s physical or emotional well-being and care, restricting visitors to the resident’s room or other designated areas, etc.).

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

VSL has developed and implemented policies and procedures to adhere to Standard and Transmission-Based Precautions in accordance with CDC’s “Guidelines for Isolation Precautions.”

VSL 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)***

VSL will provide and ensure that employees wear facemasks or a higher level of respiratory protection. Employees must wear their facemask over their 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 VSL will be FDA-cleared, authorized by an FDA Emergency Use Authorization, or otherwise offered or distributed as described in an FDA enforcement policy. VSL 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). VSL 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 respiratory protection standard (29 CFR 1910.134). VSL will also permit employees to wear their own respirator instead of a facemask and, in such cases, will comply with OSHA’s respiratory protection standard (29 CFR 1910.134). Additional information about when respirator use is required can be found below.

VSL will provide employees with a facemask and instructions for use prior to entry into the facility. VSL requires universal use of facemasks when in the facility to address asymptomatic and pre-symptomatic transmission.

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 VSL’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 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, VSL will ensure that any such employee wears a face shield, if their condition or disability permits it. VSL will provide accommodations for religious beliefs consistent with Title VII of the Civil Rights Act.
5. When VSL has demonstrated that the use of a facemask presents a hazard to an employee of serious injury or death (e.g., arc flash, heat stress, interfering with the safe operation of equipment). When this is the case, VSL 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 VSL otherwise requires use of a face shield, VSL will promote daily cleaning of face shields and ensure they are not damaged.

VSL will not prevent an employee from voluntarily wearing facemasks and/or face shields in situations where they are not required to do so, unless the situation 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, VSL 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). Supplies necessary for proper PPE use are readily accessible and available upon request.

For employees with exposure to people with suspected or confirmed COVID-19, VSL will provide respirators and other PPE, including gloves, an isolation gown or protective clothing, and eye protection. VSL 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). Supplies necessary for exposure to people with suspected or confirmed COVID-19, including respirators, are readily accessible and available upon request.

For aerosol-generating procedures (AGPs) on a person with suspected or confirmed COVID-19, VSL will provide a respirator to each employee and ensure it is used in accordance with the OSHA Respiratory Protection standard (29 CFR 1910.134). VSL 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). Supplies necessary for aerosol-generating procedures, including respirators, are readily accessible and available upon request.

VSL and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their 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, VSL 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; and
* Clean and disinfect the surfaces and equipment in the room, or area, where the procedure was performed, once the procedure is complete.

VSL 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***

VSL 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, VSL 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.

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

VSL has posted signage encouraging physical distancing of 6 feet or greater at all sites. Physical distancing will be promoted to the best extent possible. Due to the nature of work at VSL, physical distancing is not always feasible (e.g. providing direct care, food preparation and service, etc.).

***Physical Barriers***

VSL 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.

VSL and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to identify where physical barriers are needed. Physical barriers are not required in direct patient care areas or resident rooms.

Where feasible, VSL 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.

Physical barriers will be installed when physical distancing cannot be consistently maintained and spacing cannot be increased. For example, a free-standing tabletop physical barrier will be placed on public facing fixed workstations (e.g. reception desks).

***Cleaning and Disinfection***

VSL 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. VSL 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:

VSL 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:

VSL will require the cleaning of high-touch surfaces and equipment to be conducted at least once a day, following manufacturers’ instructions for the application of cleaners.

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

VSL’s cleaning and disinfection schedules, individuals responsible for conducting cleaning and disinfection, products used to clean and disinfecting the workplace, processes for cleaning patient care areas, resident rooms, and medical devices and equipment, and processes for cleaning and disinfection of the workplace if a COVID-19 positive person has been in the workplace within the last 24 hours are outlined in the COVID-19 Policy and Procedure Manual.

VSL provides alcohol-based hand rub that is at least 60% alcohol in addition to readily accessible hand washing facilities throughout the facility (e.g. resident care areas, dining services, facility points of entry, etc.). Supplies necessary for proper hand hygiene are readily accessible and available upon request. In addition, signs will be posted encouraging frequent handwashing and use of hand sanitizers.

***Ventilation***

VSL 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; and
* 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).

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. VSL will identify the building manager, HVAC professional, or maintenance staff member who can certify that the HVAC system(s) are operating in accordance with the ventilation provisions of OSHA’s COVID-19 ETS and list the individual(s) below.

| **The following individual(s) is responsible for maintaining the HVAC system(s) and can certify that it is operating in accordance with the ventilation provisions of OSHA’s COVID-19 ETS.** | |
| --- | --- |
| *Name/Contact Information:*  Mike Lien  701-787-7944 | *Location:*  Valley on Columbia |
| *Name/Contact Information:*  Brian Sand  701-787-7838 | *Location:*  Valley on 42nd |
| *Name/Contact Information:*  James Belbas  701-787-7614 | *Location:*  Tufte Manor |

***Health Screening and Medical Management***

Health Screening

VSL will actively screen each employee before each work day and each shift for COVID-19 according to the most recent CDC and CMS recommendations. When VSL requires COVID-19 testing, it will be provided at no cost to employees.

Employee Notification to Employer of COVID-19 Illness or Symptoms

VSL requires employees to promptly notify the Incident Commander on call when they have tested positive for COVID-19, been diagnosed with COVID-19 by a licensed healthcare provider, or have been told by a licensed healthcare provider that they are suspected to have COVID-19. VSL requires employees to promptly notify the COVID-19 Staff Illness Hotline when they are experiencing any symptoms of COVID-19 while at home or at work.

The Medical Removal Protection Benefits section below describes the benefits for lost work time that all employees are entitled to and which scenarios do not have associated COVID-19 benefits.

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

VSL will notify employees if they have been exposed to a person with COVID-19 at their workplace, as described below.

When VSL 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, VSL 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 a 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 a 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 a 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.

VSL will notify employees of COVID-19 exposure within 24 hours through the contact tracing process outlined in the COVID Policy and Procedure Manual.

Medical Removal from the Workplace

VSL has implemented a policy for removing employees from the workplace in certain circumstances. VSL 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 symptoms consistent with COVID-19; or
* The employee has been in close contact with a COVID-19 positive person and is either unvaccinated, or is vaccinated and eligible for a booster but has not yet received the booster.

VSL may choose to remove or test employees with additional symptoms, or refer the employees to a healthcare provider.

For employees removed because they are COVID-19 positive, VSL will keep them removed until they meet the return-to-work criteria as defined in the [CDC Interim Guidance for Managing Healthcare Personnel with SARS-CoV-2 Infection or Exposure to SARS-CoV-2.](https://www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-risk-assesment-hcp.html) For employees removed because they have been told by a licensed healthcare provider that they are suspected to have COVID-19, or those that are experiencing symptoms, VSL will keep them removed until they meet the return-to-work criteria. 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, VSL will continue to keep the employee removed from the workplace, but is not obligated to provide the medical removal protection benefits discussed below. VSL will make reasonable accommodations for employees who cannot take the test for religious or disability-related medical reasons, consistent with applicable non-discrimination laws.

If VSL 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, VSL will immediately remove the employee from the workplace according to [CDC Interim Guidance for Managing Healthcare Personnel with SARS-CoV-2 Infection or Exposure to SARS-CoV-2](https://www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-risk-assesment-hcp.html).

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

VSL 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

VSL will only allow employees positive for COVID-19, 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 Interim Guidance for Managing Healthcare Personnel with SARS-CoV-2 Infection or Exposure to SARS-CoV-2](https://www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-risk-assesment-hcp.html).

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

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

Medical Removal Protection Benefits

VSL will continue to pay employees who have been removed from the workplace under the following medical removal provisions: reflecting updated [CDC Interim Guidance for Managing Healthcare Personnel with SARS-CoV-2 Infection or Exposure to SARS-CoV-2](https://www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-risk-assesment-hcp.html).

* 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 symptoms consistent with COVID-19;

VSL will not pay Medical Removal Protection Benefits under the following circumstances:

* The employee has been in close contact with a COVID-19 positive person and is unvaccinated, or is vaccinated and eligible for a booster but has not yet received the booster. Effective December 30, 2021, after expiration of the original OSHA Healthcare ETS, VSL will not pay medical removal protection benefits if an employee does not follow this plan’s physical distancing and masking requirements in the workplace which leads to close contact and subsequent medical removal from the workplace. For example, an employee had close contact with a positive employee because they were within 6 feet of each other without masks for a cumulative 15 minutes or more at a work station or during a break. If the employee with the close contact is unvaccinated, or is vaccinated and eligible for a booster but has not yet received the booster, the employee will need to use their accumulated Paid Time Off first followed by no pay during the removal period.
* Another scenario that will not be covered by the medical removal protection benefits is exposures to COVID-19 positive individuals that are not related to the workplace. While vaccinated individuals will in some cases be eligible to continue to work throughout their exposure window, unvaccinated individuals and vaccinated individuals who are eligible for a booster but have not yet received it will need to use their accumulated Paid Time Off first followed by no pay during the removal period.

When an employee has been removed from the workplace, and is notworking remotely or in isolation, VSL will pay the employee for their scheduled shifts as long as the employee cooperates with VSL’s testing requirements. For example, if an employee is medically removed from work due to symptoms related to COVID-19, the employee must respond to communication requesting testing to occur immediately and follow through with the requested testing in order to ensure payment for the missed work time.

***Vaccination***

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

***Training***

VSL 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. VSL 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.

VSL’s COVID-19 training program will be accessible in the following ways: a copy of the plan will be available upon hire, upon request, via online education (e.g. Healthcare Academy), and in meetings (e.g. Safety Committees, Community Leadership, etc.).

VSL 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;
* VSL’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;
* VSL’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;
* VSL’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 VSL’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.

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

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

***Anti-Retaliation***

VSL will inform each employee that they 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.

VSL 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***

VSL 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***

VSL will retain all versions of this COVID-19 plan implemented to comply with OSHA’s COVID-19 ETS while the ETS remains in effect through the Safety Leadership committee.

VSL 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.

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

VSL 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, VSL 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 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***

VSL will report to OSHA:

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

1. **Monitoring Effectiveness**

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

1. **Coordination with Other Employers**

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

VSL has identified below all other employers to coordinate with to ensure employees are protected:

|  |
| --- |
| **Employer Name:** |
| Altru Health System – Physician, Nurse Practitioner, Physical Therapy, Occupational Therapy, Speech Therapy |
| Red River Valley Hospice Staff |
| Ethos Hospice Staff |
| Other Employers will be contacted as Identified through Contact Tracing |

1. **Entering Residences**

VSL will identify potential hazards and implement measures to protect employees who, in the course of their employment, enter into private residences and other physical locations controlled by a person not covered by the Occupational Safety & Health Act of 1970 (OSH Act). VSL requires that 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. VSL requires adherence to the measures identified in the COVID-19 plan while employees on duty are working in other physical locations.

1. **Signature and Plan Availability**

This COVID-19 written plan is effective on July 5, 2021 and was revised on December 30, 2021.

| **Employer Name:** | Valley Senior Living |
| --- | --- |
| **Address:** | Valley Senior Living on Columbia - 2900 14 Ave S, Grand Forks ND 58201 Valley Senior Living on 42nd for Woodside Village/Wheatland Terrace/Town Square – 4000 24 Ave S, Grand Forks ND 58201  Valley Senior Living on Cherry for Tufte Manor– 3300 Cherry Street, Grand Forks ND 58201 |
| **Signature:** | image001Garth Rydland, President/CEO, Valley Senior Living |

This and any prior version of the COVID-19 plan is available:

| * Via hard copy request of any COVID-19 Safety Coordinator stated in Section 2 of this plan. | * Coronavirus (COVID-19) Update Staff webpage at <https://valleyseniorliving.org/coronavirus-update-employees/> |
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