

## DSSW/Lifespan COVID-19 Plan

### 1. Purpose and Scope

DSSW/Lifespan is committed to providing a safe and healthy workplace for all our employees. DSSW/Lifespan 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).

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

### 2. Roles and Responsibilities

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

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

DSSW/Lifespan 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.

DSSW/Lifespan encourages its employees to make suggestions through direct communication with supervisors or through our suggestion box. All suggestions will be reviewed to determine if it is something that DSSW/Lifespan can implement. If DSSW/Lifespan makes changes the plan will be updated to include this information. DSSW/Lifespan will continue to monitor recommendations from the CDC and OSHA and update plan as necessary.

COVID-19 Safety Coordinator(s)		
Name	Title/Facility Location	Contact Information (office location, phone, email address)
Teri Silver	RN San Antonio	Tsilver@lifespantx.com
Keri Treadway	RN San Antonio	ktreadway@lifespantx.com

### 3. Hazard Assessment and Worker Protections

DSSW/Lifespan 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).

DSSW/Lifespan office employees complete a daily screening for COVID-19 when working in the office environment. Employees working from home are exempt from the daily screening unless they come into the office for any reason. All visitors to DSSW/Lifespan are screened prior to entry and all offices are locked to prevent access from unscreened visitors. DSSW/Lifespan has determined vaccination status of office employees by having each employee fill out a

standard vaccination questionnaire which is kept in their employee record. Those that are not vaccinated or do not have immunity from having COVID are required to wear a mask while in the office. Disinfection stations are set up throughout the offices with signs posted to clean work stations daily.

DSSW/Lifespan 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.

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

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

DSSW/Lifespan 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;
- DSSW/Lifespan does not do direct client/patient care in its offices
- [Encourage the use of telehealth/telephonic services where available and appropriate in order to limit the number of people entering the workplace.](#)

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

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

DSSW/Lifespan 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)***

DSSW/Lifespan will provide, and ensure that employees wear, facemasks or a higher level of respiratory protection. Facemasks must be worn by employees over the nose and mouth when indoors (if not vaccinated or have immunity) and when occupying a vehicle with another person for work purposes. Policies and procedures for facemasks will be implemented, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach.

Facemasks provided by DSSW/Lifespan will be FDA-cleared, authorized by an FDA Emergency Use Authorization, or otherwise offered or distributed as described in an FDA enforcement policy. DSSW/Lifespan 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). DSSW/Lifespan may also provide a respirator to employees when only a facemask is required (i.e., when a respirator is not otherwise required by OSHA's COVID-19 ETS) and, when doing so, will comply with OSHA's COVID-19 ETS mini respiratory protection program (29 CFR 1910.504). DSSW/Lifespan will also permit employees to wear their own respirator instead of a facemask and, in such cases, will comply with OSHA's COVID-19 ETS mini respiratory protection program (29 CFR 1910.504). Additional information about when respirator use is required can be found below.

All field employees can come into the office at anytime to pick up additional PPE and if they are not able to come to the office then PPE will be mailed or taken to them. All client homes have a PPE kit delivered at time of admission and are

notified to let office know if more PPE is needed.

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 DSSW/Lifespan's requirements for facemasks:

1. When an employee is alone in a room.
2. While an employee is eating and drinking at the workplace, provided each employee is at least 6 feet away from any other person, or separated from other people by a physical barrier.
3. When employees are wearing respirators in accordance with 29 CFR 1910.134 or paragraph (f) of OSHA's COVID-19 ETS.
4. When it is important to see a person's mouth (e.g., communicating with an individual who is deaf or hard of hearing) and the conditions do not permit a facemask that is constructed of clear plastic (or includes a clear plastic window). When this is the case, DSSW/Lifespan will ensure that each employee wears an alternative, such as a face shield, if the conditions permit.
5. When employees cannot wear facemasks due to a medical necessity, medical condition, or disability as defined in the Americans with Disabilities Act (42 USC 12101 et seq.), or due to religious belief. Exceptions will be provided for a narrow subset of persons with a disability who cannot wear a facemask or cannot safely wear a facemask, because of the disability, as defined with the Americans with Disability Act (42 USC 12101 et seq.), including a person who cannot independently remove the facemask. The remaining portion of the subset who cannot wear a facemask may be exempted on a case-by-case basis as required by the Americans with Disability Act and other applicable laws. When an exception applies, DSSW/Lifespan will ensure that any such employee wears a face shield, if their condition or disability permits it. DSSW/Lifespan will provide accommodations for religious beliefs consistent with Title VII of the Civil Rights Act.
6. When DSSW/Lifespan 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, DSSW/Lifespan 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 DSSW/Lifespan otherwise requires use of a face shield, DSSW/Lifespan will ensure that face shields are cleaned at least daily and are not damaged.

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

In addition to providing, and ensuring employees wear, facemasks, DSSW/Lifespan 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).

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

For aerosol-generating procedures (AGPs) on a person with suspected or confirmed COVID-19, DSSW/Lifespan will

provide a respirator to each employee and ensure it is used in accordance with the OSHA Respiratory Protection standard (29 CFR 1910.134). DSSW/Lifespan 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).

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

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

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

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

DSSW/Lifespan 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***

DSSW/Lifespan 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, DSSW/Lifespan 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.

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

DSSW/Lifespan have posted signs to give reminders on physical distancing and have to the best of our ability spaced out employees by 6 feet. Meetings are being done over ring central or in areas large enough to maintain physical distancing. Client visits are being completed via telephone whenever possible and if employees need to go to a home of client a pre-screening is done on the client and any other person living in the home. Employees are allowed to take their lunch at their workstation instead of going to break rooms to prevent gatherings whenever possible.

### ***Physical Barriers***

DSSW/Lifespan 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.

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

Where feasible, DSSW/Lifespan will ensure that:

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

### *Cleaning and Disinfection*

DSSW/Lifespan 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. DSSW/Lifespan 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.

DSSW/Lifespan requires the cleaning of high-touch surfaces and equipment at least once a day, following manufacturers’ instructions for the application of cleaners.

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

DSSW/Lifespan will provide alcohol-based hand rub that is at least 60% alcohol or provide readily accessible hand washing facilities.

DSSW/Lifespan has set up sanitation stations in every office and posted signs reminding employees to clean their work stations daily. Signs are also posted to encourage frequent hand washing and the use of hand sanitizers.

### *Health Screening and Medical Management*

#### Health Screening

DSSW/Lifespan will screen each employee before each work day and each shift.

Employees working in the office will complete a daily screening to check for symptoms, if symptom is positive for possibly being COVID-19 related an alert is sent to the supervisor. Field employees fill out a screening prior to seeing each client/patient and also screen the client/patient and anyone else living in the home.

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

DSSW/Lifespan will require employees to promptly notify their supervisor when they have tested positive for COVID-19 or been diagnosed with COVID-19 by a licensed healthcare provider, have been told by a licensed healthcare provider that they are suspected to have COVID-19, are experiencing recent loss of taste and/or smell with no other explanation, or are experiencing both fever ( $\geq 100.4^{\circ}$  F) and new unexplained cough associated with shortness of breath.

All employees have DSSW/Lifespan on-call numbers if they need to call during non-business hours. Employees are encouraged to stay home if they are suspected to have COVID-19 or if any symptoms are present.

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

DSSW/Lifespan will notify employees if they have been exposed to a person with COVID-19 at their workplace, as described below. The notification provisions below are not triggered by the presence of a patient with confirmed COVID-19 in a workplace where services are normally provided to suspected or confirmed COVID-19 patients (e.g., emergency rooms, urgent care facilities, COVID-19 testing sites, COVID-19 wards in hospitals). When DSSW/Lifespan 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, DSSW/Lifespan will, within 24 hours:

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

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

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

DSSW/Lifespan will notify employees of exposure via email, phone or in-person.

### Medical Removal from the Workplace

DSSW/Lifespan has also implemented a policy for removing employees from the workplace in certain circumstances.

DSSW/Lifespan will immediately remove an employee from the workplace when:

- The employee is COVID-19 positive (i.e., confirmed positive test for, or has been diagnosed by a licensed healthcare provider with, COVID-19);
- The employee has been told by a licensed healthcare provider that they are suspected to have COVID-19;
- The employee is experiencing recent loss of taste and/or smell with no other explanation; or
- The employee is experiencing both a fever of at least 100.4°F and new unexplained cough associated with shortness of breath.

For employees removed because they are COVID-19 positive, DSSW/Lifespan will keep them removed until they meet the return-to-work criteria discussed below. For employees removed because they have been told by a licensed healthcare provider that they are suspected to have COVID-19, or are experiencing symptoms as discussed above, DSSW/Lifespan will keep them removed **until they meet the return-to-work criteria discussed below or keep them removed and provide a COVID-19 polymerase chain reaction (PCR) test at no cost to the employee. If the employee tests**

negative, they can return to work immediately. If the employee tests positive or refuses a test, they must remain excluded from the workplace until the return-to-work criteria below are met. If the employee refuses to take the test, DSSW/Lifespan will continue to keep the employee removed from the workplace, but is not obligated to provide the medical removal protection benefits discussed below (Note: absent undue hardship, employers must make reasonable accommodations for employees who cannot take the test for religious or disability-related medical reasons, consistent with applicable non-discrimination laws).

If DSSW/Lifespan 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, DSSW/Lifespan will immediately remove the employee from the workplace unless:

1. The employee does not experience recent loss of taste and/or smell with no other explanation, or fever of at least 100.4°F and new unexplained cough associated with shortness of breath; AND
2. The employee has either been fully vaccinated against COVID-19 (i.e., 2 weeks or more following the final dose) or had COVID-19 and recovered within the past 3 months.

DSSW/Lifespan will keep the employee removed from the workplace for 14 days or will keep the employee removed and provide a COVID-19 test at least 5 days after the exposure at no cost to the employee. If the employee tests negative, they may return to work 7 days following exposure. If the employee tests positive, the employee must remain excluded from the workplace until the return-to-work criteria below are met. If the employee refuses a test, DSSW/Lifespan will keep the employee excluded for 14 days, but is not obligated to provide the medical removal protection benefits discussed below (Note: absent undue hardship, employers must make reasonable accommodations for employees who cannot take the test for religious or disability-related medical reasons, consistent with applicable non-discrimination laws).

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

DSSW/Lifespan 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

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

- At least 10 days have passed since symptoms first appeared, and
- At least 24 hours have passed with no fever without fever-reducing medication, and
- Other symptoms of COVID-19 are improving (loss of taste and smell may persist for weeks or months and need not delay the end of isolation).

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

Pursuant to CDC guidance, asymptomatic employees may return to work after at least 10 days have passed since a positive COVID-19 test. If an employer receives guidance from a healthcare provider that the employee may not return to work, they must follow that guidance.

## Medical Removal Protection Benefits

DSSW/Lifespan 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, DSSW/Lifespan will allow the employee to use accrued time off and if the employee runs out of or does not have accrued time off will pay the employee at their normal rate of pay following the direction below.

Employers must continue to provide the benefits to which the employee is normally entitled and pay the employee the same regular pay the employee would have received had the employee not been absent from work, up to \$1,400 per week per employee. For employers with fewer than 500 employees, the employer must pay the employee up to the \$1,400 per week cap but, beginning in the third week of an employee's removal, the amount is reduced to only two-thirds of the same regular pay the employee would have received had the employee not been absent from work, up to \$200 per day (\$1000 per week in most cases).

- The ETS also provides that the employer's payment obligation is reduced by the amount of compensation the employee receives from any other source, such as a publicly or employer-funded compensation program (e.g., paid sick leave, administrative leave), for earnings lost during the period of removal or any additional source of income the employee receives that is made possible by virtue of the employee's removal.]

## **Vaccination**

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

DSSW/Lifespan gives employees 4 hours of paid time to receive the COVID-19 vaccinations and allows the employee to use accrued time off for any side effects following vaccination. If the employee does not have accrued time the time will be paid by DSSW/Lifespan as specified above.

## **Training**

DSSW/Lifespan 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. DSSW/Lifespan 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.

DSSW/Lifespan's COVID-19 training program will be accessible in the following ways:  
On line training, direct conversation/meetings with supervisors, posted fact sheets

DSSW/Lifespan 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;
- [DSSW/Lifespan](#)'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;
- [DSSW/Lifespan](#)'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;
- [DSSW/Lifespan](#)'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 [DSSW/Lifespan](#)'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.

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

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

### ***Anti-Retaliation***

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

[DSSW/Lifespan](#) 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***

[DSSW/Lifespan](#) 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**

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

DSSW/Lifespan 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.

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

DSSW/Lifespan 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, DSSW/Lifespan 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;

## **Reporting**

DSSW/Lifespan will report to OSHA:

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

## **4. Monitoring Effectiveness**

DSSW/Lifespan 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.

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

## **5. Entering Residences**

DSSW/Lifespan 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). DSSW/Lifespan requires that DSSW/Lifespan 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.

All employees entering client's homes do pre-screening on the client and anyone else who lives in the home. If there are any indicators of COVID-19 symptoms our staff do not enter the home and report this to their supervisor.

## **6. Signature and Plan Availability**

DSSW/Lifespan has prepared and issued this COVID-19 plan on 7/2/2021

Employer Name:	DSSW/Lifespan
Address:	6243 IH-10W Suite 375 San, Antonio, TX 78201
Business Owner:	Lawrence Baker

This COVID-19 plan is available:

Via hard copy at each office location	Posted to QAPI shared drive	Available by request.
---------------------------------------	-----------------------------	-----------------------

This model plan is intended to provide information about OSHA's COVID-19 Emergency Temporary Standard. The Occupational Safety and Health Act requires employers to comply with safety and health standards promulgated by OSHA or by a state with an OSHA-approved state plan. However, this model plan is not itself a standard or regulation, and it creates no new legal obligations.