

CHARLES T. SITRIN HEALTH CARE CENTER, INC.'S COVID-19 PLAN
In Accordance with OSHA's COVID-19 Emergency Temporary Standard (ETS)
Original - Effective 7/6/2021

1. Purpose and Scope:

The Charles T. Sitrin Health Care Center, Inc., (hereinafter referred to as "Sitrin") is committed to providing a safe and healthy workplace for all our employees. Sitrin 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).

Sitrin has multiple workplaces that are not substantially similar, and therefore has created a separate COVID-19 plan for each workplace.

Facility Location	Worksite-Specific COVID-19 Considerations
Charles T. Sitrin Health Care Center, Inc. 2050 Tilden Avenue New Hartford, NY 13413 (main building plus nine {9} long term care houses located on Sitrin Lane)	Worksite-Specific Considerations will coincide with any COVID-19 nursing home regulations.

2. Rules and Responsibilities:

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

Sitrin 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.

Employee suggestions will be solicited and concerns will be addressed and suggestions will be integrated into developing, implementing, monitoring, and updating the plan as needed.

COVID-19 Safety Coordinator(s)		
Name	Title/Facility Location	Contact Information (office location, phone, email address)
Brenda Cobane, LNHA	Vice President of Long Term Care Services	Sitrin Health Care Center, Inc. 2050 Tilden Avenue New Hartford, NY 13413 Phone: 315-737-2224 Email: bcobane@sitrin.com

3. Hazard Assessment and Worker Protections:

Sitrin 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).

Sitrin has implemented a policy and procedure to determine employees' vaccination status during the new employee onboarding process. Any new staff member joining Sitrin will be asked during the onboarding process as to whether they have been vaccinated against COVID-19. In the event they have been, the Human Resource Representative will obtain a copy of their vaccination card for their personnel file. If the employee has not been vaccinated, they will either complete a declination form during the onboarding process which outlines the reasons as to why the facility is recommending they get vaccinated as well as any potential side effects from the vaccine. In addition, when signing the form, the employee also is educated that they can change their mind at any time and can receive the vaccine by completing a consent form. If the employee indicates that they would like to receive the vaccine during the onboarding process, they will be given a consent form to complete which will then be forwarded to the Vice President of Long Term Care Services so that the employee can be scheduled in the weekly vaccination clinic.

Sitrin and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to conduct the workplace-specific hazard assessment. OSHA's COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis will be used to assess hazards related to COVID-19 at Sitrin to develop and implement policies and procedures for worker protection. All completed hazard assessment forms and results will be attached to this plan and will be accessible to all employees and their representatives at Sitrin.

Sitrin 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:

In settings where direct patient care is provided, Sitrin 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;
- Perform health checks on all residents once daily and as needed. Any symptoms or concerns such as fever (measured with a thermometer), cough, difficulty breathing, or loss of taste or smell are reported immediately to the Charge Nurse, Unit Manager, and/or Supervisor. Any resident with fever or signs or symptoms of COVID-like illness should be immediately isolated to their room and the physician should be notified immediately for further direction. Sitrin has the ability to rapid test both residents and staff;
- If the building is closed for visitation due to a positive COVID-19 case, compassionate care visits and end-of-life visits are still permitted. Compassionate care visits must be approved by the interdisciplinary team and must meet the established criteria. The physician determines when a resident becomes end-of-life and is able to receive visitors;
- Limit floating of staff between houses and units to the extent possible;

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Patient Screening and Management (continued):

- Implement other applicable patient management strategies in accordance with the CDC's "COVID-19 Infection Prevention and Control Recommendations";
- Encourage the use of telehealth services where available and appropriate in order to limit the number of people entering the workplace.

Standard and Transmission-Based Precautions:

Sitrin has developed and implemented policies and procedures to adhere to Standard and Transmission-Based Precautions in accordance with CDC's "Guidelines for Isolation Precautions."

Sitrin 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. OSHA's COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis will be used to assess COVID-19 hazards and develop and implement Standard and Transmission-Based infection control precautions.

Personal Protective Equipment (PPE):

Sitrin will provide and ensure that employees wear facemasks or a higher level of respiratory protection. Facemasks must be worn by employees over the nose and mouth when indoors and when occupying a vehicle with another person for work purposes. Policies and procedures for facemasks will be implemented, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach.

Sitrin maintains adequate supplies of PPE on-site to facilitate resident, staff, and visitor use. PPE is monitored by the Purchasing Manager and the Vice President of Long Term Care Services on a daily basis; orders are placed for additional inventory based on par levels and burn rates. The facility maintains a 60-day inventory supply on hand of all PPE. Usage is monitored even more closely when there is a COVID-19 "outbreak" in the facility to assure that inventory does not drop below the 60-day supply. The facility maintains purchasing relationships with both local and national PPE vendors/distributors with the intent of securing supplies during emergent situations.

Facemasks provided by Sitrin will be FDA-cleared, authorized by an FDA Emergency Use Authorization, or otherwise offered or distributed as described in an FDA enforcement policy. Sitrin 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). Sitrin 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). Sitrin 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 staff will have access to facemasks and respirators (when appropriate) while on duty. PPE is maintained on-site and available by all care staff 24 hours a day, 7 days a week. Each department/unit/house is responsible to have a supply of masks and respirators available for all staff working in that department/unit/house. Masks are also available at the front desk area in the main building as well as in the community center where staff screen at the start of their shift. Facemasks will also be provided for all visitors, vendors, and family members upon arrival to the facility.

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Personal Protective Equipment (PPE) (continued):

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 Sitrin'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, Sitrin 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, Sitrin will ensure that any such employee wears a face shield, if their condition or disability permits it. Sitrin will provide accommodations for religious beliefs consistent with Title VII of the Civil Rights Act.
6. When Sitrin 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, Sitrin 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 Sitrin otherwise requires use of a face shield, Sitrin will ensure that face shields are cleaned at least daily and are not damaged.

Sitrin 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, Sitrin 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).

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Personal Protective Equipment (PPE) (continued):

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

Sitrin follows current New York State Department of Health and CDC guidance for individuals with suspected or confirmed COVID-19. Employees are directed to follow established transmission-based precaution standards established by Sitrin at all times when in contact with potentially infectious individuals. In addition, PPE is provided to all employees based on these established infection control programs.

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

Sitrin 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. OSHA's [COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis](#) may be used.

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, Sitrin 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.

Sitrin 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. OSHA's [COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis](#) may be useful.

Physical Distancing:

Sitrin 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, Sitrin 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.

Physical Distancing (continued):

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

Signs have been posted throughout the main building and the long-term care houses indicating that 6 feet of social distance should be maintained whenever possible especially in areas that can be considered a bottleneck area, i.e. at the employee and visitor kiosk screening areas, when staff are clocking in or out for their shift, at building entrances, etc. In addition, floor markings are in place to guide employees and visitors to maintain that 6 feet of social distancing. In addition, floor markings are in place as well in the resident dining rooms to assure that each chair is where it should be to maintain social distancing during mealtimes.

When physical distancing is required, Sitrin management staff will ensure physical workplaces provide enough distance between employees whenever possible. Shared office spaces are arranged to assure physical distancing between employees. When physical distancing is not possible, physical barriers have been used.

In addition, OSHA's COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis may be used to identify, develop, and implement physical distancing measures for employee protection, and identify fixed work locations where physical distancing cannot be maintained between employees and co-workers, customers, visitors, and other non-employees, as well as controls and practices that can be implemented to protect employees in these fixed work locations.

Signage has been posted outside of the elevators indicating that only two people should be in the elevator at one time in order to maintain social distancing. Conference room tables and chairs have been arranged in meeting rooms to provide for social distancing. In the event this has not been possible to maintain, meeting size will be limited as much as possible and staff will be required to wear facemasks while in the group setting.

Physical Barriers:

Sitrin 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.

Sitrin and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to identify where physical barriers are needed. OSHA's COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis may be used to identify where to install physical barriers for employee protection from COVID-19. Physical barriers are not required in direct patient care areas or resident rooms.

Where feasible, Sitrin will ensure that:

- Physical barriers are solid and made from impermeable materials;
- Physical barriers are easily cleanable or disposable;

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Physical Barriers (continued):

- 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:

Sitrin 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. Sitrin 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. OSHA's COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis may be used to assess COVID-19-related hazards and develop and implement policies and procedures for cleaning and disinfection.

In patient care areas, resident rooms, and for medical devices and equipment:

Sitrin 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:

Sitrin requires the cleaning of high-touch surfaces and equipment at least once a day, following manufacturers' instructions for the application of cleaners. These high-touch areas can include (but certainly is not all inclusive): computer keyboards and screens, doorknobs, light switches, hallway handrails, phones, nightstands, bathroom fixtures, desktops, countertops, medication carts, blood pressure cuffs, stethoscopes, office machinery, etc.

When a person who is COVID-19 positive has been in the workplace within the last 24 hours, Sitrin 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). In addition, Sitrin has two (2) Sani-Spray sanitizing machines that utilizes shockwave to treat the contaminated area(s).

Cleaning logs will be completed by the housekeeping staff. The Director of Housekeeping will review the logs to assure ongoing compliance. Logs will be located in the Director of Housekeeping's office. The "housekeeping checklist" identifies specific high-traffic areas and surfaces to be cleaned on an ongoing basis to reduce the risk of COVID-19. Cleaning will also be the responsibility of all staff to facilitate visitation for the day to assure appropriate cleaning/sanitation of visitation areas inside the building.

Cleaning and Disinfection (continued):

Sitrin has multiple locations for hand hygiene to be completed. Visitors are asked to utilize the 60% alcohol-based hand rub during the screening process. This sanitizer is located at the front entrance. Signage is posted throughout the campus encouraging staff, visitors, vendors, and residents to do frequent handwashing as a way to prevent the spread of COVID-19. This hand rub is also located throughout common areas in the main building as well as on the units and in the long-term care houses, as well as at employee time clocks. Automatic dispensers in addition to single pump bottles are located at various locations throughout the building and houses to make it convenient for usage.

The Housekeeping staff, nursing staff, and administrative screeners are responsible to maintain the supply of this hand sanitizer in common areas in the building, on the units, and in the houses. In addition, bathroom facilities are located near the screening entrance to the main building as well as on the units and in the houses where sinks, soap, and paper towels are available for proper hand hygiene.

Vehicles:

Residents and all staff are required to wear masks, to the extent they can medically tolerate one, when being transported by facility vehicles between locations. Staff who cannot medically tolerate the use of a face covering should not be assigned to transport individuals. After each trip is completed, the interior of the transport vehicle should be thoroughly sanitized and disinfected before additional individuals are transported. Where appropriate and safe, windows should be rolled down to permit air flow.

Ventilation:

Sitrin will implement policies and procedures for each facility's heating, ventilation, and air conditioning (HVAC) system and ensure that:

- The HVAC system(s) is used in accordance with the manufacturer's instructions and the design specifications of the HVAC system(s);
- The amount of outside air circulated through the HVAC system(s) and the number of air changes per hour are maximized to the extent appropriate;
- All air filters are rated Minimum Efficiency Reporting Value (MERV) 13 or higher, if compatible with the HVAC system(s); if not compatible, the filter with the highest compatible filtering efficiency is used;
- All air filters are maintained and replaced as necessary to ensure the proper function and performance of the HVAC system;
- All intake ports that provide outside air to the HVAC system(s) are cleaned, maintained, and cleared of any debris that may affect the function and performance of the HVAC system(s); and
- Existing airborne infection isolation rooms (AIIRs), if any, are maintained and operated in accordance with their design and construction criteria.

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Ventilation:

Sitrin’s Director of Facilities works with outside contracted vendors in maintaining the optimal operation of all HVAC systems. 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. Sitrin will identify the building manager, HVAC professional, or maintenance staff member who can certify that the HVAC system(s) are operating in accordance with the ventilation provisions of OSHA’s COVID-19 ETS and list the individual(s) below.

Additional measures to improve building ventilation in accordance with “CDC’s Ventilation Guidance”. For example:

- Opening windows and doors during work hours when outdoor climate allows, and when doing so would not present other health or safety hazards;
- Placing fans in windows, but not where potentially contaminated air flows directly from one person to another;
- Running the HVAC system for at least 2 hours before and after the building is occupied;
- Using portable high-efficiency particulate air (HEPA) fan/filtration systems; or
- Other measures identified by the employer.

OSHA’s COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis may be used to assess the HVAC system and develop and implement ventilation measures for the workplace.

<p>The following individual(s) is responsible for maintaining the HVAC system(s) and can certify that it is operating in accordance with the ventilation provisions of OSHA’s COVID-19 ETS. (e.g., Maintenance staff, HVAC service contractor(s))</p>	
<p><u>Name/Contact Information:</u> John Edwards, Director of Facilities 2050 Tilden Avenue, New Hartford, NY 13413</p>	<p><u>Location:</u> Sitrin</p>
<p><u>Name/Contact Information:</u> H. J. Brandeles Corporation 8101 Halsey Road, Whitesboro, NY 13492</p>	<p><u>Location:</u> Whitesboro, NY</p>

Health Screening and Medical Management:

Sitrin will screen each employee before each work day and each shift. These screenings include:

- Performing health checks on all employees, visitors, and vendors entering the building/houses. Employees are required to have their temperature taken via kiosk devices and to answer a series of questions before entering the building or the houses. All visitors and vendors entering the building will have a health check completed at the main, front entrance prior to entering the building or a house/unit. These health checks are comprised of their temperature being taken as well as completing a screening form which asks a series of questions about their health and any exposure that they may have had. Visitors complete their forms prior to entering the building and are asked to maintain social distancing outside prior to being called in to the building to have their temperature taken. Sitrin also has the right to ask

Health Screening and Medical Management (continued):

visitors and vendors about their vaccination status and can ask to view the vaccine card. Visitation is by reservation only and limited to the resident's room or else outside. In order to maintain infection control practices while visitors are in the building, only a certain number of visits can occur at a time which is controlled through a visitation schedule. Visitors and vendors must wear facemasks when entering the building;

- Sitrin will perform COVID-19 testing on employees according to CDC and DOH guidelines. Any employee testing that is done will be at no cost to the employee.

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

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

Any employee who reports to work and is not feeling well must inform their supervisor, the Infection Control Nurse, or the COVID-19 Safety Coordinator so that they can be immediately evaluated and possibly COVID-19 rapid tested. The employee will then be sent home and given instructions by the Infection Control Nurse in regard to when they are able to return based on test results, exposure, etc.

Sitrin has implemented policies and procedures based on guidelines and recommendations from both the CDC and NYS Department of Health to promote employees staying at home when they are sick, when household members are sick, or when required by a healthcare provider to isolate or quarantine themselves or a member of their household. Please refer to those policies.

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

Sitrin 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 Sitrin 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, Sitrin 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.

Health Screening and Medical Management (continued):

- 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.

Employees who have been exposed to COVID-19 in the workplace will be notified by the Infection Control Nurse or designee either in person or by telephone.

Medical Removal from the Workplace:

Sitrin has also implemented a policy for removing employees from the workplace in certain circumstances. Sitrin 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, Sitrin 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, Sitrin 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, Sitrin 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).

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Health Screening and Medical Management:

Medical Removal from the Workplace (continued):

If Sitrin 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, Sitrin 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.

Sitrin 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, Sitrin 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, Sitrin 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, Sitrin will continue to pay that employee the same regular pay and benefits the employee would have received had the employee not been absent.

Sitrin 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:

Sitrin 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, Sitrin will follow the guidance of a licensed healthcare provider regarding return to work.

Health Screening and Medical Management:

Return to Work Criteria (continued):

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:

Sitrin will continue to pay employees who have been removed from the workplace under the medical removal provisions of OSHA's COVID-19 ETS.

Staff will be paid in accordance with the New York State Department of Labor Guidance on use of COVID-19 Sick Leave issued on January 20, 2021, which states the following:

1. An employee who returns to work following a period of mandatory quarantine or isolation does not need to be tested before returning to work, except for nursing home staff. However, an employee who subsequently received a positive diagnostic test result for COVID-19 must not report to work. The employee shall be deemed to be subject to a mandatory order of isolation from the Department of Health and shall be entitled to sick leave as required by New York's COVID-19 Sick Leave Law, whether or not the employee already has received sick leave as required by the law for the first period of quarantine or isolation. However, the employee must submit documentation from a licensed medical provider or testing facility attesting that the employee has tested positive for COVID-19. The employee does not need to submit documentation of a positive result if the employee's employer gave the employee the test for COVID-19 that showed the positive result.
2. An employee who is subject to an order of quarantine or isolation but continues to test positive for COVID-19 after the end of such quarantine or isolation period must not report to work. Please note that an employee is not recommended to be tested to discontinue isolation or quarantine. The employee shall be deemed to be subject to a second mandatory order of isolation from the Department of Health and shall be entitled to sick leave as required by New York's COVID-19 Sick Leave Law for the second period of isolation. However, the employee must submit documentation from a licensed medical provider or testing facility attesting that the employee has received a positive diagnostic test for COVID-19 after completing the initial period of isolation. The employee does not need to submit documentation of a positive result if the employee's employer gave the employee the test for COVID-19 that showed the positive result.
3. If an employer mandates that an employee who is not otherwise subject to a mandatory or precautionary order of quarantine or isolation to remain out of work due to exposure or potential exposure to COVID-19, regardless of whether such exposure or potential exposure was in the workplace, the employer shall continue to pay the employee at the employee's regular rate of pay until such time as the employer permits the employee to return to work or the employee becomes subject to a mandatory or precautionary order of quarantine or isolation, at which time the employee shall receive sick leave as required by New York's COVID-19 Sick Leave Law, in accordance with this guidance, for the period of time the employee is subject to such mandatory or precautionary order of quarantine or isolation.

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Health Screening and Medical Management:

Medical Removal Protection Benefits (continued):

4. In no event shall an employee qualify for sick leave under New York's COVID-19 Sick Leave Law for more than three orders of quarantine or isolation. The second and third orders must be based on a positive COVID-19 test in accordance with paragraphs 1 and 2.

Vaccination:

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

Sitrin will abide by New York State Labor Law 196-C, Leave Time for COVID-19 Vaccination:

1. Every employee shall be provided a paid leave of absence from his or her employer for a sufficient period of time, not to exceed four hours per vaccine injection to be vaccinated for COVID-19.
2. The entire period of the leave granted pursuant to this section shall be provided at the employee's regular rate of pay and shall not be charged against any other leave such employee is otherwise entitled to, including sick leave.

Sitrin will follow the New York State Department of Labor Guidance on Use of Paid Sick Leave for COVID-19 Vaccine Recovery time. This guidance states that employers are obligated to honor the employee's desire to use accrued sick leave for the recovery of any side effects of the COVID-19 vaccination.

In addition, Sitrin will provide weekly COVID-19 Vaccination Clinics for any employee who would like to receive the vaccine. A consent form will be reviewed with new employees by Sitrin's Human Resource Department during the onboarding process. If the employee elects to receive the vaccine, the consent form will be completed by the new employee and the form will then be forwarded to the Vice President of Long Term Care Services who will schedule this employee to receive the vaccine at the next weekly clinic. The second dose of the vaccine will then be scheduled three weeks after the first dose is administered.

The weekly vaccine clinics are open to all employees, meaning that any employee who has previously declined the vaccination and then decides to receive it, can complete a consent form and forward that to the Vice President of Long Term Care Services or designee. Once the completed consent is received, the Vice President of Long Term Care Services will make every attempt to schedule the employee within 14 days to receive their first dose of vaccine during the facility's weekly clinic hours. The second dose of the vaccine will then be scheduled three weeks after the first dose is administered.

Sitrin offers the Pfizer vaccine to employees. The vaccine is obtained through Sitrin's long-term care pharmacy (Health Direct) and is administered by Sitrin's Education and Training Department (RN nurses) or designee.

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Training:

Sitrin 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. Sitrin 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. OSHA's COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis may be useful.

Sitrin's COVID-19 training program will be accessible in the following ways: via the Sitrin Intranet, mandatory inservices for all staff, departmental meetings, staff meetings, and email correspondence.

Sitrin 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;
- Sitrin'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;
- Sitrin'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;
- Sitrin'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 Sitrin'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.

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Training (continued):

Sitrin 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.

Sitrin 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:

Sitrin 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.

Sitrin 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:

Sitrin 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:

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

Sitrin 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.

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

Sitrin will maintain and preserve the COVID-19 log while OSHA's COVID-19 ETS remains in effect.

Recordkeeping (continued):

By the end of the next business day after a request, Sitrin will provide, for examination and copying:

- All versions of the written COVID-19 plan to all of the following: any employees, their personal representatives, and their authorized representatives.
- The individual COVID-19 log entry for a particular employee to that employee and to anyone having written authorized consent of that employee;
- A version of the COVID-19 log that removes the names of employees, contact information, and occupation, and only includes, for each employee in the COVID-19 log, the location where the employee worked, the last day that the employee was at the workplace before removal, the date of that employee's positive test for, or diagnosis of, COVID-19, and the date the employee first had one or more COVID-19 symptoms, if any were experienced, to all of the following: any employees, their potential representatives, and their authorized representatives.

Reporting:

Sitrin will report to OSHA:

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

4. Monitoring Effectiveness:

Sitrin 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.

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

5. Coordination with Other Employers:

Sitrin 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.

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

Sitrin has identified below all other employers (agency staff) to coordinate with to ensure employees are protected:

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5. Coordination with Other Employers (continued):

Other Worksite Employers	
Employer Name / Employer Representative:	Contact Information:
Med-Cor Elizabeth Gard Katie Orzechowski	716-853-2100 liz@med-cor.com katie@med-cor.com
Cross County Medical Staffing Network (MSN) Denise Ackley	518-452-0205 DAckley@crosscountry.com
KOND Medical Nerina Moultriez	njmoultriez@kondmedical.org
Express Employment Professionals Lori Calabrese	315-790-5723 Lori.Calabrese@ExpressPros.org
CPS Recruitment Sue Cognetti	315-883-5496 scognetti@cpsrecruiter.com

6. Entering Residences:

Sitrin does not have employees who enter in to private residences or other physical locations.

7. Signature and Plan Availability:

Sitrin has prepared and issued this COVID-19 plan on July 6, 2021.

Employer Name:	Charles T. Sitrin Health Care Center, Inc.
Address:	2050 Tilden Avenue, New Hartford, NY 13413
Signature:	

This COVID-19 plan is available:

Via hard copy at the front desk located in the main building.	Posted to the Sitrin website	Available by request. Contact: Vice President of Long Term Care Services 2050 Tilden Avenue, New Hartford, NY 13413 Phone: (315) 797-3114 Note that this COVID-19 plan must be provided for examination and copying by employees and their representatives by the end of the next business day after a request.
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