



Piedmont Home Care COVID-19 Plan

1. Purpose and Scope

Piedmont Home Care is committed to providing a safe and healthy workplace for all our employees. Piedmont Home Care 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).

2. Roles and Responsibilities

Piedmont Home Care'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 Piedmont Home Care's full support in implementing and monitoring this COVID-19 plan and has authority to ensure compliance with all aspects of this plan.

Piedmont Home Care 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.

All employees will be encouraged to submit suggestions or concerns regarding COVID-19 in the workplace. All suggestions or concerns, whether written or verbally submitted, will be documented on the COVID-19 Recommendation Log. Each line item will be reviewed by all Piedmont Home Care Safety Coordinators for validity and feasibility of implementation. Should a recommendation be fit for implementation, the lead Safety Coordinator will assign the development and implementation of the new policy and update this plan.

COVID-19 Safety Coordinator(s)		
Name	Title/Facility Location	Contact Information (office location, phone, email address)
Anna Regan, RN	RN Coordinator	anna@piedmonthomecare.com
Michael Coil	Vice President, Client Services	michael@piedmonthomecare.com

3. Hazard Assessment and Worker Protections

Piedmont Home Care will conduct a workplace-specific hazard assessment of its workplace 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).



Piedmont Home Care and the COVID-19 Safety Coordinator(s) will work 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 the Piedmont Home Care workplace and 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.

Piedmont Home Care 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:

Client Screening and Management

In settings where direct patient care is provided, Piedmont Home Care will:

- Screen and triage all clients, and their care providers when entering the setting for symptoms of COVID-19
 - Screening will be completed via Clear Care Mobile App for each care provider daily
 - Exposure warnings are sent to the Clear Care system in the event a care provider identifies a COVID-19

Standard and Transmission-Based Precautions

Piedmont Home Care will continue to leverage our existing policies and procedures around Standard and Transmission-Based Precautions in accordance with CDC's "[Guidelines for Isolation Precautions](#)." All Piedmont Home Care staff are trained on these precautions at time of hire and reviewed annually.

Personal Protective Equipment (PPE)

Piedmont Home Care 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.

Piedmont Home Care will provide employees with enough facemasks, which must be changed at least once a day, whenever they are soiled or damaged, and more frequently as necessary (e.g., client care reasons). Piedmont Home Care 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.

Facemasks will be available 24 hours a day, 7 days a week at the Piedmont Home Care office.

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 Piedmont Home Care'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, Piedmont Home Care 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, Piedmont Home Care will ensure that any such employee wears a face shield, if their condition or disability permits it. Piedmont Home Care will provide accommodations for religious beliefs consistent with Title VII of the Civil Rights Act.

If a face shield is required to comply with OSHA's COVID-19 ETS or Piedmont Home Care otherwise requires use of a face shield, Piedmont Home Care will ensure that face shields are readily available.

Piedmont Home Care 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, Piedmont Home Care 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.

All PPE will be available 24 hours a day, 7 days a week at the Piedmont Home Care office.

For employees with exposure to people with suspected or confirmed COVID-19, Piedmont Home Care will provide PPE, including masks, gloves, an isolation gown or protective clothing, and eye protection.

Physical Distancing

Piedmont Home Care 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, Piedmont Home Care 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.



Cleaning and Disinfection

Piedmont Home Care 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.

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

Piedmont Home Care 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:

Piedmont Home Care 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, Piedmont Home Care 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).

Piedmont Home Care will provide alcohol-based hand rub that is at least 60% alcohol or provide readily accessible hand washing facilities. In addition, signs will be posted encouraging frequent handwashing and use of hand sanitizers.

All cleaning, disinfection and hand hygiene products will be available 24 hours a day, 7 days a week at the Piedmont Home Care office.

Health Screening and Medical Management

Health Screening

Piedmont Home Care will screen each employee before each workday and each shift.

Screening will be completed via Clear Care Mobile App for each care provider daily. Exposure warnings are sent to the Clear Care system in the event a care provider identifies a COVID-19

Employee Notification to Employer of COVID-19 Illness or Symptoms

Piedmont Home Care will require employees to promptly notify office staff 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 ($\geq 100.4^\circ\text{F}$) and new unexplained cough associated with shortness of breath.



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

Piedmont Home Care 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 Piedmont Home Care 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, Piedmont Home Care will, within 24 hours:

- Notify each employee who 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.

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.

Medical Removal from the Workplace

Piedmont Home Care has also implemented a policy for removing employees from the workplace in certain circumstances. Piedmont Home Care 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.

Piedmont Home Care may choose to remove or test employees with additional symptoms from the CDC list or refer the employees to a healthcare provider.

For employees removed because they are COVID-19 positive, Piedmont Home Care 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, Piedmont Home Care will keep them removed until they meet the return-to-work criteria discussed below or keep them removed and provide a COVID-19 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, Piedmont Home Care will continue to keep the employee removed from the workplace but is not obligated to provide the medical removal protection benefits discussed below.

If Piedmont Home Care 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, Piedmont Home Care 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.

Piedmont Home Care will keep the employee removed from the workplace for 5 days or will keep the employee removed and provide a COVID-19 test 3 days after the exposure at no cost to the employee. If the employee tests negative, they may return to work. 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, Piedmont Home Care will keep the employee excluded for 5 days but is not obligated to provide the medical removal protection benefits discussed below.

Any time an employee must be removed from the workplace, Piedmont Home Care 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, Piedmont Home Care will continue to pay that employee the same regular pay and benefits the employee would have received had the employee not been absent.

Piedmont Home Care 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

Piedmont Home Care 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).
- Agree to adhere to the PPE and masking policies outlined in in this plan

If an employee has severe COVID-19 or an immune disease, Piedmont Home Care 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 5 days have passed since a positive COVID-19 test with strict masking. 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

Piedmont Home Care will continue to pay employees who have been removed from the workplace under the medical



removal provisions of OSHA's COVID-19 ETS. Note the following requirements under OSHA's COVID-19 ETS:

- 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).

Vaccination

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

Piedmont Home Care 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. Piedmont Home Care and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees to assess COVID-19 hazards and implement an employee training program. [

Piedmont Home Care 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;
- Piedmont Home Care's policies and procedures on client 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);
- Piedmont Home Care'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 procedures for cleaning and disinfection;



Piedmont Home Care 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.

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

Anti-Retaliation

Piedmont Home Care 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.

Piedmont Home Care 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

Piedmont Home Care 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

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

Piedmont Home Care 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, 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.

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

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



Reporting

Piedmont Home Care will report to OSHA:

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

4. Monitoring Effectiveness

Piedmont Home Care and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees to monitor the effectiveness of this COVID-19 plan so as to ensure ongoing progress and efficacy.

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

5. Coordination with Other Employers

Piedmont Home Care 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.

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

6. Entering Residences

Piedmont Home Care 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).



7. Signature and Plan Availability

Piedmont Home Care has prepared and issued this COVID-19 plan on January 1, 2022.

Employer Name:	Piedmont Home Care, Inc.
Address:	2160-B Country Club Road, Winston-Salem, NC 27104
Business Owner:	Robert F. Coil, President

This COVID-19 plan is available:

<input type="checkbox"/> Via hard copy at Piedmont Home Care office	<input type="checkbox"/> Available by request
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