



REACH HIGH

SAFETY PLAN

Response to COVID-19

Intent: We value the health and safety of all those under our care. Therefore, we will follow the mandates and recommendations put forth by our governing entities to protect to the best of our ability our people and our clients. We will not be negligent or non-compliant.

In response to the spread of “COVID-19”, a respiratory disease caused by the novel coronavirus, RHC has developed this COVID-19 Safety Plan as part of our efforts to reduce the potential for exposure to and spread of the coronavirus. This Plan is based on information available from the U.S. Centers for Disease Control and Prevention (“CDC”), the Occupational Safety and Health Administration (“OSHA”), and the State of Indiana and is subject to change based on further guidance from these and other public health agencies. RHC will monitor coronavirus-related guidance and will communicate any changes to this Plan.

Please familiarize yourself with this plan. We are counting on all employees to do their parts to promote a healthy, safe working environment. This will be considered a fluid plan. As new information is shared by the CDC, Health Department, and government, there may be a need to review and revise this plan. RHC will communicate updates as they come. If you have any questions about the Plan, please contact your supervisor.

I. Employee, Visitor, and Client Health Screening Process

RHC has instituted the following health screening process for all employees reporting for work on-site at our facilities:

Temperature Limit

Any person(s) with a temperature of 100.4 degrees or higher will not be allowed into the building interior. If an employee or client has a temperature exceeding the 100.4 degrees limit we will complete the following:

1. Inform the supervisor responsible for the employee or the client’s assigned teaching team.
2. The individual will be asked to leave until they have been fever-free for at least 24 hours without medication.

Any person(s) with a temperature 99 degrees or higher will have their temperature checked on at least an hourly basis until their temperature is below 99 degrees.

School pick-up screening protocol

1. The client will be required to stay at school and follow the school’s procedure for a person(s) with a fever grade temperature (100.4 or higher).

2. The client will need to be fever-free for at least 24 hours without medication prior to the resumption of Reach High pick-ups from school.

Employee Temperature Screening Process

Upon reporting for work, each employee should expect to take their own temperature and inform the clinical operations manager. If the clinical operations manager is not sitting at the front desk, take a photo of the reading and send it by google chat to the clinical operations manager.

Client Temperature Screening Process

Parents are to park in the parking lot and will be greeted by staff who will do a temperature check while the client is in the car or standing beside the vehicle. Parents will not be permitted to leave until it is confirmed that their child is fever-free.

Visitor Temperature Screening Process

Visitors are defined as any person that is not a client receiving therapy, an employee, or contractor of RHC. Reach High visitors will follow the employee temperature screening process. Visitors should be handled by the clinical operations manager.

Symptom Self-Assessment

Any person(s) exhibiting two or more of the following symptoms associated with COVID-19 will not be allowed into the building interior.

Symptom List

- New or worsening dry cough,
- Shortness of breath/difficulty breathing.
- Fever >100.4F/Chills (may include repeated shaking due to chills)
- New loss of taste or smell
- Headaches or muscle pain
- Sore throat

If a person is exhibiting two or more of any of the symptoms mentioned above they must complete the following:

1. Inform the supervisor responsible for the employee or the client's assigned teaching team.

2. The individual will be required to meet the return to work/therapy requirements for COVID-19 symptoms found on page 8.

School Transportation Protocol (If exhibiting 2 or more symptoms)

If a person is exhibiting two or more of any of the symptoms mentioned above at the time of their scheduled pick up from school they must complete the following:

1. Inform the supervisor responsible for the employee or the client's assigned teaching team.
2. The client will be required to stay at school and follow the school's procedure for a person(s) exhibiting COVID-19 symptoms.
3. The client will need to meet the return to work/therapy requirements for COVID-10 symptoms found on page 8 prior to the resumption of Reach High pick-ups from school.

Bi-Weekly COVID-19 Testing and Diagnosis

RHC will implement monthly COVID-19 testing intervals to continuously identify employees that may be positive for COVID-19 while asymptomatic. The purpose of testing is to reduce the unknown spread of COVID-19 within the facility, by first observing return to work protocols for positive asymptomatic cases. Staff mitigation protocols will still apply.

Testing will be performed if:

1. An employee has a positive case.
2. A client has a confirmed positive case in their household.

Testing will be suspended if:

1. We have two successful cycles where all RHC employees return with a negative test result.

Testing Procedure:

1. Reach High will conduct bi-weekly testing with ARIA diagnostics on-site for all RHC employees. If an employee misses a testing day due to extenuating circumstances, other arrangements may be made for the employee to be tested.
2. If an employee refuses to test they will be removed from the schedule and it may result in disciplinary action up to and including termination.

Positive Test Result

1. Any individual that receives a positive test result will be removed from work immediately and unable to return to work until they meet the criteria on pages 9-10.
2. Any clients that the individual worked with will be removed from the clinic until they meet the criteria on pages 9-10.

II. Cleaning and Disinfecting Protocols for the Workplace

Building Interior Entry Protocol

1. Sanitize your hands
2. Complete the temperature and health screening process.
3. Disinfect all personal items using disinfectant sprays and disinfectant wipes provided in the front lobby.
4. Wash your hands upon entry into the building interior.

Operational Protocols (During therapy session hours)

All shared spaces and items must be disinfected using spray and/or disinfectant wipes provided at each workstation and group area in the facility. The primary surfaces and items that require disinfection are as follows:

- Tables and frequently used surfaces
- Chairs and other seating areas
- Common/Shared Items (i.e. computers including keyboards and mice, group materials, and toys.)

The frequency of disinfection should be as frequent as possible without causing disruption to treatment that exceeds 3 minutes. If any cleaning or disinfection would exceed 3 minutes, ask for assistance using Google chats, assigned walkies, or any other reasonable form of communication.

Common tasks that require disinfection upon completion:

- A work session in a therapy room
- A group session in the classroom
- Lunch and Snack
- Computer time (keyboard, mouse, desk)
- All water toys must be dumped of water at the end of each day

Daily facility cleaning (after hours)

Reach High's cleaning service completes a deep cleaning of the facility including the usage of medical grade disinfectants and cleaning solutions daily after all clients have left for the day.

Vehicle & Transportation Protocols

All Reach High Vehicles must be disinfected immediately after each use and cleaned at the end of each shift. Disinfect commonly touched surfaces in the vehicle between transporting passengers.

- When cleaning and disinfecting, individuals should wear disposable gloves compatible with the products being used as well as facial coverings.
- Doors and windows should remain open when disinfecting the vehicle.
- When possible, give the vehicle a minimum of 15 minutes to ventilate after cleaning.
- When ventilation is not possible due to another scheduled transport, all windows must remain down and the air conditioner on high for at least 15 minutes to allow for ventilation.
- At the end of each shift, clean with detergent or soap and water if the surfaces are visibly dirty. Be sure to remove all trash.
- Areas that may require cleaning and/or disinfecting: hard non-porous surfaces within the interior of the vehicle such as hard seats, arm rests, door handles, seat belt buckles, light and air controls, doors and windows, and grab handles. Soft or porous surfaces such as fabric seats. Electronic surfaces, such as tablets or touch screens used in the vehicle.

Gloves and any other disposable PPE used for cleaning and disinfecting the vehicle should be removed and disposed of after cleaning; wash hands immediately after removal of gloves and PPE with soap and water for at least 20 seconds, or use an alcohol-based hand sanitizer with at least 60% alcohol if soap and water are not available.

III. Enhanced Personal Hygiene Measures

All person(s) are required to increase the frequency of hand sanitizing and washing while in the building interior. Reach High requires hand washing surrounding the following activities:

- Start and end of each therapy session with a client. (including mid-day changes)
- All activities related to bathroom use (personal, diaper changes, potty training)
- All activities related to food use (preparation, consumption, clean-up)

All person(s) are required to sanitize their hands surrounding the following activities:

- Prior to entering the publicly used spaces:
 - Motor Room

- Classroom
- Computer Room
- Transitions to and from any group activities

IV. Face Covering



All adult person(s) must wear a non-filtering mask or face covering over their nose and mouth when in the building interior or a Reach High vehicle. Cloth, fabric, or other soft or permeable materials that covers the nose and mouth and surrounding areas of the lower face are permissible.

A person is allowed to remove their face covering under the following circumstances:

- In a private office (alone) with the door shut.
- In the bathroom (alone) with the door shut.
- Outside of the facility
- In the kitchen, while eating/drinking

Client Desensitization Programs:

Clients will have programs added to their sessions that will focus on increasing their tolerance and understanding of facial coverings. This may include the following:

- Identifying a facial covering
- Identifying the use of a facial covering
- Increasing the duration of wearing a facial covering
- Learning proper care of a facial covering
- Increasing social awareness of wearing facial coverings

All clients that meet the exceptions listed below will be exempt from the facial covering desensitization programs. Guardians also have the right to request these programs to be removed

from the client's sessions at any time by stating there is a medical reasoning for being exempt from the mandate.

Exceptions to the use of masks or face coverings are as follows:

- Children who are two years of age or younger.
- Individuals who are unable to wear a face-covering for a documented physical, medical, or health-related reason. (including the hearing or speaking impaired).
- Individuals who are traveling in personal vehicles.
- Individuals for whom wearing a face covering would present a risk to their safety while at work, as determined by local, state, or federal workplace safety regulations.
- Individuals who are engaged in a form of indoor exercise that is incompatible with wearing a face covering, including swimming.
- Individuals who are engaged in outdoor physical exercise, including running, jogging, walking, bicycling, or swimming, if in groups of less than 25.
- Bonafide emergency situations in which a person lacks the time or the means to put on a face-covering before entering an indoor or outdoor public space. Individuals who are outdoors and are maintaining at least 6 feet of distance from others who are not part of their household.

Applying Face Coverings (General Instructions)

1. Put it over your nose and mouth and secure it under your chin
2. Secure the face covering to your face using ties/ear loops (try to fit it snugly against the sides of your face)
3. Ensure you can breathe easily

Removing Face Coverings (General Instructions)

1. Untie the strings behind your head or stretch the ear loops (handling only by the ear loops or ties)
2. Fold outside corners together
3. Place covering in the washing machine if reusable or trash if disposable
4. Wash hands immediately after removing.

*** While handling face-covering do not touch your face, nose, or mouth. It is recommended to wash your hands prior to handling your face covering whenever possible.

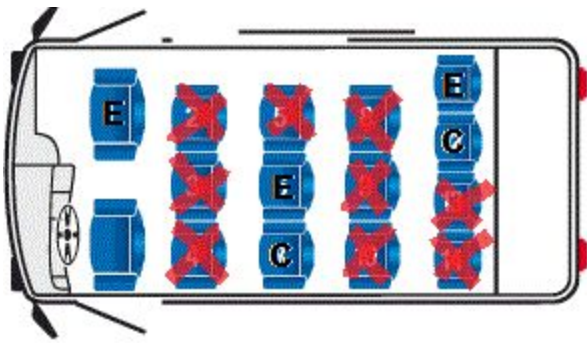
IV. Social Distancing

RHC requires all person(s) to maintain a 6-foot distance from other employees and clients (not including your assigned client), when possible. To better facilitate social distancing in the facility, play areas, eating areas, and workstations have been spread throughout the facility.

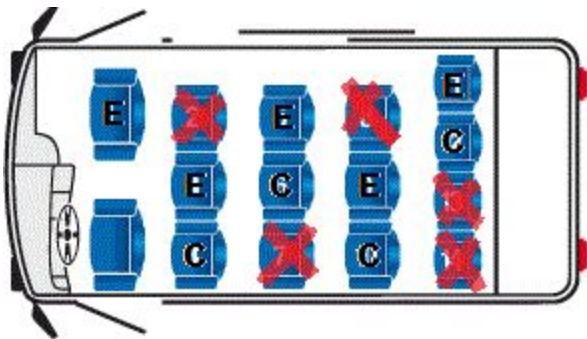
Social Distancing (Transportation)

Due to social distancing requirements, ideal van transportation is limited to two client/staff pairs and one driver. The maximum vehicle load will be four client/staff pairs and one driver. Below is the seating arrangements:

To achieve 6-foot distancing, each client/staff pair will keep a row of seats between themselves and other passengers and the driver.



To achieve 3-foot distancing, each client/staff pair will sit in an alternating pattern, with the first pair using the seats most left, the next pair using the seats most right. The alternating pattern will be utilized due to the fact that while employees will wear masks during transport, some clients may not because of their progress in mask desensitization programs.



VI. Handling COVID-19 Exposure and Symptoms

Any person(s) suspected of having COVID-19 whether symptomatic or asymptomatic must generally do the following:

1. Inform the supervisor responsible for the employee or the client's assigned teaching team.
2. Immediately leave the facility (if not possible, quarantine in Office 2 wearing a mask, until you are able to leave)
3. Complete the COVID-19 Reporting & EPSL Eligibility Form
4. Remain in home isolation (unless you have a severe case that requires hospitalization).

Company Response within Facility

1. Remove the suspected person(s) from the facility as soon as possible.
2. Close off any areas the person(s) was at for a prolonged period of time (> 15 minutes) until it can be cleaned and disinfected. (If possible, wait 24 hours before cleaning and disinfecting to minimize potential exposure to the individual(s) cleaning the area.)
3. Communicate with all RHC employees and clients maintaining confidentiality for the person(s) removed. (Required by the Americans with Disabilities Act (ADA))
4. Provide COVID-19 resources to the suspected/confirmed person(s).
5. **If Employee:** The employee must complete the EPSL Eligibility Form, to confirm eligibility for Emergency Paid Sick Leave (EPSL) under the Families First Care Act.

Additional Company Response to Positive COVID-19 Cases (Symptomatic and Asymptomatic)

1. Assess the clinic's ability to continue operations based on Health Department guidance. Reach High will not close the facility voluntarily unless it is recommended by the Health Department because we are providing services that are a medical necessity and considered Healthcare Providers.

Returning to Work/Therapy after suspected or confirmed exposure

Confirmed Contact with a Positive COVID-19 Case

Generally, close contact with a positive COVID-19 case means you have spent 15 minutes or more within 6 feet of a person(s) starting from 2 days before illness onset (or, for asymptomatic clients, 2 days prior to a positive test (not antibody) for COVID-19. If you do not meet the basic criteria, the following may be considered close contact:

- You provided care at home to someone who is sick with COVID-19
- You had direct physical contact with the person (touched, hugged, or kissed them)
- You shared eating or drinking utensils
- They sneezed, coughed, or somehow got respiratory droplets on you

Where possible, Reach High recommends (one of the following must be true):

- At least 14 days have passed since the first contact with the confirmed COVID-19 case.

- A negative result from the RT-PCR test for SARS-CoV-2 RNA.

Exhibiting unconfirmed COVID-19 symptoms or Positive Test for COVID-19 with Symptoms

Any person(s) exhibiting COVID-19 symptoms will not be able to return to work/therapy unless all of the following is true:

- At least 10 days have passed since symptoms first appeared
- At least 24 hours have passed since last fever without fever-reducing medication
- Symptoms have improved

Positive Test for COVID-19 without Symptoms (asymptomatic)

Any person(s) that receives a positive test result for COVID-19 using an RT-PCR test for SARS-CoV-2 RNA that is not exhibiting symptoms may be allowed to work due to our classification as a Healthcare Provider. Where possible, Reach High recommends:

- At least 10 days have passed since the date of their first positive test. (Based on the date of the test, not the date the results were received.)

*Due to the attempt to mitigate staff shortages, Reach High may allow clinical employees to return to work prior to fully meeting the return to work requirements.

*Neither a negative test for COVID-19 nor a letter from the Department of Health should be required to return to work.

VII. Handling staffing and Staff Shortages

Critical Infrastructure workers (RBT/PM-BCBA/APM)

Generally, Reach High prefers to and will attempt to uphold the full requirement for returning to work for all specified cases of COVID-19 exposure. However, Reach High is classified as a Healthcare Provider which means we have different expectations requiring us to maintain operational capacity in the event of suspected and confirmed exposure to COVID-19. Clinical staff at Reach High may continue to work as long as they remain asymptomatic. The following additional requirements apply to employees that are asymptomatic but are considered confirmed contact for COVID-19:

- If the employee can fulfill their duties remotely, they will be sent home to continue work from home, until they meet the return to work criteria for asymptomatic employees on page 9-10.

- Face Covering Adjustment: Positive employees must keep face covering on at all times including designated removal areas at the facility. To allow breaks from the face covering, the employee may remove their mask if and only if:
 - They are at least 6 feet away from any person(s)
 - They are outside of the facility
- Temperature Adjustment: Positive Employees must have their temperature checked at least two times during the workday: Start of shift; During shift change.
- Pre-Screening Adjustment: The employee should continue to self-monitor for symptoms during their workday. At the onset of any symptoms, the employee must follow the procedures for symptoms on page 3.
- Social Distance: The employee should maintain 6 feet and practice social distancing as work duties permit in the workplace. (This would include keeping the employee with the same client)
- Cleaning and disinfection adjustment: Clean and disinfect all areas such as offices, bathrooms, common areas, shared electronic equipment after use. (It is highly recommended that the positive contact employee wears gloves as much as possible to reduce direct contact with shared items and areas.)

Mitigating staff shortages

When staffing shortages are anticipated, the clinical team in collaboration with the administrative team should use contingency capacity strategies to plan and prepare for mitigating this problem.

At baseline, we must:

- Understand our staffing needs and the minimum number of staff needed to provide a safe work environment and safe client care.
- Be in regular communication with families about the potential for staff shortages due to COVID-19 (illness, exposure, care of those sick, etc...)
- Cancel all non-essential tasks. Shift all certified staff to work in the areas to support client sessions. RHC will to the best of our ability ensure these certified individuals have received appropriate orientation and training to work with new clients by making accessible the client's profile information, program management, and/or overlap with a trained team member when possible.
- As appropriate, request that critical infrastructure employees postpone elective time off from work. However, there should be a consideration for the mental health benefits of time off and that the burden of the disease and care-taking responsibilities may differ substantially among certain racial and ethnic groups.
- Implement critical infrastructure workers ONLY if necessary

Contingency Capacity Strategies

1. Re-allocate clinical roles with pre-set time off the floor. Team leaders, APMs, BCBAAs.
2. Cancel client sessions where allowable.

Crisis Capacity Strategies

1. If client sessions cannot be canceled and clinical roles have all been fully allocated to the floor, allow asymptomatic confirmed contacts to return to work - starting with the person(s) who have had the most time between contact.
2. Remain operational at a lower capacity with fewer clients, and employees, until additional employees that meet the return to work criteria can work to restore staffing.

**Reach High will not allow any employees to work that are showing COVID-19 symptoms or received a positive COVID-19 test result.

Important Links

1. Follow guidelines for “discontinue home isolation for persons with confirmed or suspected COVID-19” <https://www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html>
2. EPSL Eligibility Form: <https://forms.gle/q5mS7bx8yDgT7nMz8>
3. General COVID-19 Guidelines for Businesses:
<https://www.cdc.gov/coronavirus/2019-ncov/community/general-business-faq.html#Suspected-or-Confirmed-Cases-of-COVID-19-in-the-Workplace>
4. Guidelines for the continuation of work as a Critical Infrastructure Worker:
<https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html>