



## **RETURN TO WORK PLAN**

MMI takes the health and safety of our employees and the people we serve very seriously. With the spread of the coronavirus or “COVID-19,” a respiratory disease caused by the SARS-CoV-2 virus, we all must remain vigilant in mitigating the outbreak. In order to return to work safely, we have developed this plan to be implemented throughout MMI and at all of our community sites. We have also identified a team of employees to monitor available U.S. Center for Disease Control and Prevention (“CDC”) and Occupational Safety and Health Administration (“OSHA”) guidance on the virus.

This plan is based on currently available information from the CDC and OSHA, and is subject to change based on further information provided by these and other regulatory agencies. MMI may also amend this plan based on operational needs.

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### **I. Responsibilities of Managers and Directors**

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All managers and directors must be familiar with this Plan and be ready to answer questions from employees. Managers and directors must set a good example by following this Plan at all times. This involves practicing good personal hygiene and jobsite safety practices to prevent the spread of the virus. Managers and directors must encourage this same behavior from all employees. Managers and directors are responsible for assuring each individual they supervise has received a copy of this plan and the training about returning to work safely (see Attachment B).

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### **II. Responsibilities of Employees**

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All employees are expected to help with our prevention efforts while at work. In order to minimize the spread of COVID-19, we all play a part. As set forth below, MMI has instituted various housekeeping, social distancing, and other best practices. All employees must follow these. In addition, employees are expected to report to their managers or directors if they are experiencing signs or symptoms of COVID-19, as described below. If you have a specific

question about this plan or COVID-19, please ask your supervisor. If they cannot answer the question, please contact the CEO.

OSHA and the CDC have provided the following control and preventative guidance to all workers, regardless of exposure risk:

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes.
- Avoid close contact with people who are sick.

In addition, employees must familiarize themselves with the symptoms of COVID-19:

- Coughing;
- Fever;
- Shortness of breath, difficulty breathing; and
- Early symptoms such as chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, loss of taste or smell, and runny nose.

If you develop a fever and symptoms of respiratory illness, such as cough or shortness of breath, DO NOT GO TO WORK. Notify your supervisor and call your healthcare provider right away. Likewise, if you come into close contact with someone showing these symptoms, call your healthcare provider right away.

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### III. Risk

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Low exposure risk jobs are those that do not require contact with people known to be, or suspected of being, infected with COVID-19 nor frequent close contact with (i.e., within 6 feet of) the general public. Most employees, including managers, directors, specialists, and administrative staff fall into this group. Additional engineering controls are not recommended

for workers in the lower exposure risk group. Employers should ensure that engineering controls, if any, used to protect workers from other job hazards continue to function as intended. Please refer to MMI's Infection Control Procedure and MMI's Pandemic Flu Procedure for engineering controls already in place.

Medium exposure risk jobs include those that require frequent and/or close contact with (i.e., within 6 feet of) people who may be infected with COVID-19, but who are not known or suspected COVID-19 patients. This could include our direct support professionals and some placement or program specialists, depending on the assignment. Additional actions for these employees are as follows:

- Install physical barriers, such as clear plastic sneeze guards, where feasible.
- Assure face masks are available.

MMI does not provide services that put employees in the category of High or Very High Risk. These categories include healthcare providers who are working directly with confirmed cases or in testing sites where they have direct exposure.

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#### **IV. Job Site Protective Measures**

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MMI has instituted the following protective measures:

*A. General Safety Policies and Rules*

- All staff shall access the building through the front door only. Persons served may enter using the side door on the north side of the building between 9:00 and 9:30 am. They may exit between 3:00 and 3:30 pm through the side door as well. This door shall remain locked at all other times. All other doors to the building shall remain locked at all times. Before being granted access, all staff must complete the appropriate screening tool required by the local Community Mental Health agency or by MMI and sanitize their hands. If staff answer "yes" to any of the screening questions, they must immediately return to their vehicle and phone MMI for additional screening and instructions. When the rate of community spread is either high or moderately high, all staff will be required to wear masks in the building. A notice will be posted on the front door when this applies. Persons served should wear masks unless previously identified as being unable to do so.
- Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave and return home. If transportation is not immediately available, the individual will be isolated in a vacant room or restroom until transportation

arrives. The space will be thoroughly cleaned and disinfected after departure and MMI staff who were exposed to the individual will be quarantined as required.

- *Meetings will be held in person when social distancing requirements can be met.* If there are too many people to meet this requirement, meetings will be held by electronic conference (i.e., Zoom or Microsoft Teams) or telephone when possible. If meetings are conducted in-person, attendance will be collected verbally and the supervisor will sign-in each attendee. Attendance will not be tracked through passed-around sign-in sheets. During any in-person meetings, there will be no gathering in groups of more persons than permitted by Executive Order and participants must remain at least six (6) feet apart.
- Employees must avoid physical contact with others and direct other employees/persons served/visitors to increase personal space to at least six (6) feet, where possible.
- Schedules will be established to stagger breaks and lunches, if practicable, to reduce the size of any group at any one time to meet requirements of current Executive Orders.
- MMI understands that due to the nature of our community-based work, access to running water for hand washing may be limited. In these situations, MMI will provide, if available, alcohol-based hand sanitizers and/or wipes.
- Staff and persons served who are working in settings where tools are used (including mops, grabbers, vacuum cleaners and more) should limit the use of shared tools and equipment. If tools must be shared, MMI will provide appropriate cleaners or sanitizing wipes to clean tools before and after use. When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
- Employees are encouraged to minimize ride-sharing and to only transport persons served when no alternative is available. While in agency vehicles, staff should ensure adequate ventilation. Air flow settings should draw in outside air and not re-circulate interior air. Windows should be opened a small amount if weather permits.
- If practicable, employees should use/drive the same vehicle every shift.

*B. Providing Services in Community Settings*

- When providing services in community settings, staff should evaluate the specific hazards when determining best practices related to COVID-19. When mask usage is required in the MMI building, all staff will use masks in any indoor setting. Persons served should wear masks unless previously identified as being unable to do so.
- Each community employment site or community volunteer site shall have a site-specific protocol to assure the guidelines in MMI's plan are followed. When the employer's plan differs from MMI's plan, the more stringent of the two will be followed.
- When applicable to the location, staff must sanitize the space used in the location upon arrival, throughout the workday, and immediately before departure. MMI will provide appropriate cleaning products for this purpose.
- Employees should ask other people at the location to keep a personal distance of six (6) feet at a minimum. Staff and persons served should wash or sanitize hands immediately upon arrival and again before departure.

*C. Visitors to MMI Buildings*

- The number of visitors will be limited to only those necessary for the work being performed. This would include contractors for immediate maintenance needs, funding source representatives, interviewees, prospective persons served for tours, required inspections, pest control, and guardians of persons served for emergency needs only.
- All visitors will be screened in advance of admittance to the building. If the visitor answers "yes" to any of the screening questions, he/she will not be permitted to access the worksite.
- Deliveries will be permitted but should be properly coordinated with the Operations Manager to assure minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles if possible.

*D. Personal Protective Equipment and Work Practice Controls*

- In addition to regular PPE for workers engaged in various tasks MMI will also provide:

- Gloves: Gloves are to be worn when providing direct physical assistance (restrooms, meals, medication) to persons served. Staff should wash or sanitize hands immediately after removing gloves.
- Masks: Reusable or disposable masks are expected to be worn at all times when providing services when the rate of community spread is above the designated threshold identified by the CDC. MMI will provide masks, but employees may choose to use their own mask if a different style is preferred. Because N95 masks are not required or provided, employees choosing to wear them will be required to sign a statement indicating they are wearing the N95 masks voluntarily. A clean mask must be used when the assignment changes. Masks should be removed by the ties or elastic – do not touch the front of the mask. Masks should be immediately placed into a paper or plastic bag until they can be washed. Staff should wash or sanitize hands before putting on a mask and immediately after removing and storing a mask.
- Face Shields: When staff are within a physical proximity of three feet (for example, if assisting with eating or assisting in the restroom) for a prolonged period of time, a face shield must be worn in addition to a face mask.

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## **V. Cleaning and Disinfecting**

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MMI has instituted regular housekeeping practices, which includes cleaning and disinfecting frequently used tools and equipment, tabletops, door handles, restrooms, and other elements of the work environment, where possible. Please see Attachment E for specific cleaning protocols. Employees should regularly do the same in their assigned work areas.

- Work areas and break/lunchroom areas will be cleaned at least once per day. Individuals assigned to clean will be issued proper personal protective equipment (“PPE”), such as nitrile, latex, or vinyl gloves as recommended by the CDC.
- Any trash collected must be changed by someone wearing nitrile, latex, or vinyl gloves.
- Vehicles and equipment/tools should be cleaned by the designated staff before use and before change in operator or rider.
- If an employee has tested positive for COVID-19, OSHA has indicated that there is typically no need to perform special cleaning or decontamination of work environments, unless those environments are visibly contaminated with blood or other bodily fluids. Notwithstanding this, MMI will clean those areas of the

workplace that a confirmed-positive individual may have come into contact with before employees can access that workspace again.

- MMI will ensure that any disinfection shall be conducted using one of the following:
  - Common EPA-registered household disinfectant;
  - Alcohol solution with at least 60% alcohol; or
  - Diluted household bleach solutions may be used only if other options are not available and if appropriate for the surface.

Please refer to attachment F for a list of cleaners and their purpose.

- MMI will maintain Safety Data Sheets of all disinfectants used on site.

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## **VI. Exposure Situations**

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- **Employees or Persons Served Exhibiting COVID-19 Symptoms**

If an employee or person served exhibits COVID-19 symptoms, the individual must remain at home. Staff may either get a COVID test at a facility licensed to administer a test (not a home test) or until he or she is symptom free for 24 hours (1 full day) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). MMI will similarly require that if an individual reports to work or services with symptoms, they must return home and remain there until the criteria established above have been met. Individuals who do not drive must have emergency transportation available in case symptoms develop onsite. Emergency pickup must occur within 45 minutes of notification. MMI will not transport any person displaying symptoms.

- **Employee or Person Served Tests Positive for COVID-19**

An employee who tests positive for COVID-19 will be directed to self-quarantine away from work. The funding source will be notified as required by contract. MMI will notify any individual who may have had contact with the affected individual by phone and by letter (see Attachment C). Employees and persons served who test positive and are symptom free may return to work when at least five (5) days have passed since symptoms began or, if

asymptomatic, the date of his or her first positive test. Individuals who test positive and are directed to care for themselves at home may return to work when: (1) at least 72 hours (3 full days) have passed since recovery;<sup>1</sup> and (2) at least five (5) days have passed since symptoms first appeared. Employees that test positive and have been hospitalized may return to work when directed to do so by their medical care provider. The Director of Human Resources will notify the applicable health department immediately when applicable.

- **Employee or Person Served Has Close Contact with an Individual Who Tested Positive for COVID-19**

Anyone who has come into close contact with an individual with a confirmed-positive COVID-19 case AND who has not been fully vaccinated will be directed to self-quarantine for 10 days from the last date of close contact with the individual. Close contact is defined as within six (6) feet for a period of time that accumulates to more than 15 minutes throughout a 24-hour period.

If MMI learns that an employee or person served has tested positive, MMI will conduct an investigation into who may have had contact with the confirmed-positive employee in the prior 2 days and direct those individuals that have had close contact with the confirmed-positive case to self-quarantine for five (5) days from the last date of close contact with the carrier unless they have been fully vaccinated. If fully vaccinated, the individual may return to work, but must monitor for symptoms. If an individual learns that he or she has come into close contact with a confirmed-positive individual outside of the workplace, he/she must alert a manager or supervisor of the close contact and also self-quarantine for five (5) days from the last date of close contact with the carrier.

If applicable, the local CMH and public health department will be notified.

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## **VII. OSHA Recordkeeping**

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If a confirmed case of COVID-19 is reported, MMI will determine if it meets the criteria for recordability and reportability under OSHA's recordkeeping rule. OSHA requires employers to record work-related injuries and illnesses that meet certain severity criteria on the OSHA 300 Log, as well as complete the OSHA Form 301 (or equivalent) upon the occurrence of these injuries. For purposes of COVID-19, OSHA also requires employers to report to OSHA any work-related illness that (1) results in a fatality, or (2) results in the in-patient hospitalization

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<sup>1</sup> Recovery is defined as: (1) resolution of fever without the use of fever-reducing medications; and (2) improvement in respiratory symptoms (e.g., cough, shortness of breath).

of one or more employee. “In-patient” hospitalization is defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment.

OSHA has decided that COVID-19 should *not* be excluded from coverage of the rule – like the common cold or the seasonal flu – and, thus, OSHA is considering it an “illness.” However, OSHA has stated that only confirmed cases of COVID-19 should be considered an illness under the rule. Thus, if an employee simply comes to work with symptoms consistent with COVID-19 (but not a confirmed diagnosis), the recordability analysis would not necessarily be triggered at that time.

If an employee has a confirmed case of COVID-19, MMI will assess any workplace exposures to determine if the case is work-related. Work-relatedness is presumed for illnesses that result from events or exposures in the work environment, unless it meets certain exceptions. One of those exceptions is that the illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs *outside* of the work environment. Thus, if an employee develops COVID-19 *solely* from an exposure outside of the work environment, it would *not* be work-related, and thus not recordable.

MMI’s assessment will consider the work environment itself, the type of work performed, risk of person-to-person transmission given the work environment, and other factors such as community spread. Further, if an employee has a confirmed case of COVID-19 that is considered work-related, MMI will report the case to OSHA if it results in a fatality within 30 days or an in-patient hospitalization within 24-hours of the exposure incident occurring.

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## VIII. “Essential” Industry

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In general, services and supports to people with disabilities has been deemed essential and MMI is committed to continuing operations when needed. Essential employees are provided with a letter indicating this designation. See Attachment D for more information.

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## IX. Confidentiality/Privacy

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Except for circumstances in which MMI is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. When it is required, the number of persons who will be informed of an individual’s condition will be kept at the minimum needed not only to comply with legally-required reporting, but also to

assure proper care of the individual and to detect situations where the potential for transmission may increase. A sample notice is attached to this plan (Attachment C). MMI reserves the right to inform other employees or persons served that a co-worker (without disclosing the person's name) has been diagnosed with COVID-19 if the others might have been exposed to the disease so the individual may take measures to protect their own health.

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#### **X. Return to Work Committee**

MMI has established an employee team, representing all job categories and all locations, to review this plan on a regular basis and to recommend updates as needed. Modifications will be recommended based on practical matters, changing guidance and regulations, and concerns.

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#### **X. Worksite Supervisor**

All members of the MMI leadership team are considered to be worksite supervisors for the purpose of this plan. That means at least one member will be onsite at each building-based location when staff are present. When services are provided in community-based settings, or after-hours in an MMI building, the assigned Connections Coach or Job Coach will be the designated Worksite Supervisor. The worksite supervisor(s) are responsible for assuring all staff and persons served are in compliance with the requirements of this plan, including use of PPE and reporting requirements.

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#### **XI. Reporting, General Questions, and Concerns**

Given the fast-developing nature of the COVID-19 outbreak and the changing requirements based on Executive orders, MMI may modify this plan at any time. If you have any questions concerning this plan, please contact any member of the Return to Work committee or the CEO. Concerns, comments, and suggestions may be submitted verbally or in writing to a worksite supervisor or to any members of the Return to Work committee. The committee will review and make recommendations where needed. The CEO will review the recommendations and make a final determination.

If you see a clear violation of the plan, you should immediately notify any worksite supervisor or the CEO.

Disagreement with the plan does not constitute grounds to disregard any element of the plan. Employees or persons served who disagree with the plan are encouraged to follow the established problem-solving procedure.

MMI Covid Response Flowchart  
January 13, 2022

Tested positive/unable to/refused testing	Exposed but no symptoms and Protected (Including booster)	Exposed but no symptoms and unprotected (Including lack of booster)	Exposed and symptoms Protected or not	Symptoms but tested negative
<p>Quarantine for 5 days from day of exposure. Get tested on day 5 if possible.</p> <p style="text-align: center;"><b>AND</b></p> <p>Be fever free with improving symptoms before returning to work</p> <p style="text-align: center;"><b>AND</b></p> <p>Wear a well-fitting mask for 5 more days (surgical, KN95 or N95) <b>NO CLOTH MASKS</b></p>	<p>Wear a well-fitting mask for 10 days (surgical, KN95 or N95) <b>NO CLOTH MASKS</b></p> <p>Get tested on day 5 is possible</p>	<p>Quarantine for 5 days from day of exposure. Get tested on day 5 if possible</p> <p style="text-align: center;"><b>AND</b></p> <p>If still no symptoms on day 6 you can return to work</p> <p style="text-align: center;"><b>AND</b></p> <p>Wear a well-fitting mask for 5 more days (surgical, KN95 or N95) <b>NO CLOTH MASKS</b></p>	<p>Get tested if positive see tested positive.</p>	<p>If mild symptoms are improving</p> <p style="text-align: center;"><b>AND</b></p> <p>there is no known exposure return to work</p>
<p>If symptoms are not improving and/or fever is present continue to quarantine 10 days or until they resolve</p>	<p>If symptoms develop get tested. If positive see tested positive</p> <p>If negative stay home until symptoms resolve</p>	<p>If symptoms develop get tested. If positive see tested positive</p> <p>If negative stay home until symptoms resolve</p>	<p>If negative stay home until symptoms resolve</p>	

\*All masks worn after quarantine **MUST** be surgical, KN95 or N95. **NO CLOTH MASKS**

\*All tests must be PCR or Rapid Antigen test

\*The day of known exposure or the first day of symptoms if no known exposure is Day 0

\**protected* means individual...

- is fully vaccinated and have gotten booster, **OR**
- got a 2<sup>nd</sup> dose of Pfizer or Moderna vaccine within the last 6 months **OR**
- got an initial dose of Johnson & Johnson within the last 2 months