Day Habilitation Program Safety Plan

PURPOSE:

St. Dominic’s Family Services has developed a safety plan for the reopening of the St. Dominic’s Day Program. This plan addresses the requirements contained in the OPWDD Guidance dated 7/10/2020 and 7/16/2020.

The purpose of this Safety Plan is to inform all Day Habilitation Staff on the safe re-opening of the Day Habilitation Program in Rockland and Goshen and maintains compliance with the regulations and ensures the safety of the people we support.

SCOPE:

This plan will cover the staff and individuals of the St. Dominic’s Day Habilitation Programs located in Rockland and Goshen.

St. Dominic’s Family Services is committed to resuming full access to services for individuals, as well as to maintaining health and safety standards, social distancing directives, and precautions to help protect against the spread of COVID-19. The Day Habilitation Staff will be responsible for implementation and monitoring of these guidelines and are required to adhere to all applicable local, state and federal requirements, remain well-informed with any relevant updates and to incorporate those updates as needed into operating practices and the site-specific Safety Plan. The following is the required elements of the St. Dominic’s Family Services Day Habilitation Program Safety Plan.

SAFETY PLAN:

All staff at St. Dominic’s Day Habilitation Program will maintain and have available at each location the Site Safety Plan.

A. Entrance to Site Based/Participation in Community Based Programs

   o All staff and individuals, as well as any essential visitors, will be screened prior to entry into any of the St. Dominic’s Day Program locations and monitored for signs and symptoms of COVID-19 thereafter.

   o The Registered Nurse or Day Program Coordinator/Supervisor will conduct daily health screenings for individuals attending the Day Program. The Registered Nurse or Day Program Supervisor will log the result of “yes” or “no” on the individuals’ Health Screening Form.
Each employee will have their temperature taken by the Registered Nurse or Day Program Supervisor. The employee will be required to answer the COVID-19 screening questions daily. The Registered Nurse or Day Habilitation Supervisor will note the responses on the Health Screening Form.

The Registered Nurse or Day Habilitation Coordinator/Supervisor will require individuals and staff to immediately report, COVID-19 related symptoms throughout the day.

Any individual or staff reporting or exhibiting signs/symptoms of COVID-19 upon arrival will not be allowed to enter the program building.

Staff will be required to consult with the Day Program Coordinator/Supervisor and the Senior Executive Vice President of Human Resources and Workforce Development to return home until they are fever free for 72 hours without the use of fever-reducing medications (i.e., Tylenol, Advil).

If symptoms begin while at the Day Program, the individual or staff will be sent home as soon as possible. The program will keep sick individuals and staff separate from well individuals and staff. Any individual or staff sent home will be instructed to contact their healthcare provider for assessment and testing. The Day Habilitation Supervisor/Senior Vice President of Developmental Disability Services will immediately notify the local health department (Rockland County or Orange County Departments of Health) and OPWDD about the suspected case. The Day Habilitation Program will provide the individual or staff with written information on healthcare and testing resources.

Individuals sent home from program will consult with their healthcare practitioner prior to returning to the program.

Staff sent home will comply with the St. Dominic’s Return to Work Protocol.

- Individuals may not return to or attend Day Program while a member of their household or certified residence are being quarantined or isolated.

- If an individual or staff member is identified with COVID-19, the Day Habilitation Program will follow instructions from the Rockland County, Orange County, or State Department of Health Staff to determine when the individual/staff can return to the program and what additional steps are needed.

All staff and individuals will perform hand hygiene immediately upon entering the program and throughout the day.

The Day Habilitation Coordinator (Rockland)/Supervisor (Goshen) is assigned to be the site safety monitor whose responsibility includes oversight of compliance with all aspects of the Day Program Safety Plan. In their absence a next line supervisor will be assigned.

St. Dominic’s Day Habilitation Program(s) will maintain a log of every person, including staff and essential visitors, who may have close contact with other individuals at the facility; excluding deliveries that are performed with appropriate PPE or through contactless means. Log should contain contact information, such that all contacts may be identified, traced, and notified in the event someone is diagnosed with COVID-19. St. Dominic’s Day Habilitation Programs will cooperate with local health department contact tracing efforts.
o Staff is required to take the following actions related to COVID-19 symptoms and contact:

- If a staff has COVID-19 symptoms **AND EITHER** tests positive for COVID-19 **OR** did not receive a test, the staff may only return to work after completing a 14-day self-quarantine and contacting the St. Dominic’s Family Services Human Resource Department. If a staff is critical to the operation or safety of a facility, the Senior Executive Vice President of Human Resources and Workforce Development will consult the local health department (Rockland County or Orange County), CDC and DOH guidelines regarding the minimum number of days to quarantine before a staff is safely able to return to work with precautions to mitigate the risk of COVID-19 transmission.

o If a staff **DOES NOT** have COVID-19 symptoms **BUT** tests **Positive** for COVID-19, the staff can only return to work after completing a 14-day self-quarantine. If a staff is critical to the operation or safety of a facility, the Senior Executive Vice President of Human Resources and Workforce Development will consult the local health department (Rockland County or Orange County) the CDC and DOH standards on the minimum number of days to quarantine before a staff is safely able to return to work with additional precautions to mitigate the risk of COVID-19 transmission.

o If a staff has had close contact with a person with COVID-19 for a prolonged period AND **symptomatic**, the staff should notify the Day Habilitation Supervisor/Senior Vice President of Developmental Disability Services, or the Senior Executive Vice President of Human Resources and Workforce Development and follow the above protocol for a positive case.

o If a staff has had close contact with a person with COVID-19 for a prolonged period of time **AND** is **NOT** symptomatic, and the inability to temporarily furlough that employee would cause a hardship to St. Dominic’s Family Services or the Day Habilitation Program, the staff should notify the St. Dominic’s Day Habilitation Program Supervisor and adhere to the following practices prior to and during their work shift, which should be documented by St. Dominic’s Day Program:

  i. **Regular monitoring:** As long as the staff does not have a temperature or symptoms, they will be required to self-monitor consistent with St. Dominic’s Family Services health monitoring policies.

  ii. **Wear a mask:** The staff should wear a surgical face mask at all times while in the Day Program.

  iii. **Social distance:** Staff should continue social distancing practices, including maintaining, at least, six feet distance from others.

  iv. **Disinfect and clean facility spaces:** Continue to clean and disinfect all areas such as offices, bathrooms, classrooms, common areas, and shared electronic equipment routinely.

o Entrance into the Day Program locations will be restricted to essential staff responsible for the direct provision of service not amenable to delivery via telehealth alternatives or those persons required to ensure continued health and safety operations (e.g. PPE supply delivery or work control etc.). Signage is posted alerting nonessential visitors are not allowed.

o In the event an individual, staff or anyone they reside with are placed on quarantine or isolation, the responsible party (i.e. self, guardian, residence manager etc.) must notify the St. Dominic’s Day Habilitation Coordinator/Supervisor or the Senior Vice President of Developmental Disability
Services immediately and must suspend attending St. Dominic’s Day Program until they are medically cleared to return to work/program.

B. Social Distancing Requirements

All staff will be required to ensure that, for any programming occurring indoors, capacity is limited to the number of participants and required staff which ensures the following:

- To the best extent possible, at least six feet of physical distance is maintained among individuals and staff, unless safety of the core activity requires a shorter distance or an individual’s treatment plan requires that closer contact be maintained with a staff member. In such instances staff and the individual are required to wear face appropriate coverings.
- All staff are required to wear an appropriate face mask at all times while at work, unless medically contraindicated.
  - Acceptable face coverings for COVID-19 include but are not limited to cloth-based face coverings and disposable masks that cover both the mouth and nose.
  - Cloth, disposable, or other homemade face coverings are not acceptable face coverings for workplace activities that typically require a higher degree of protection for personal protective equipment due to the nature of the work. For those activities, N95 respirators or other personal protective equipment (PPE) used under existing industry standards should continue to be used, as is defined in accordance with OSHA guidelines.
  - Activities that typically require a higher degree of protection are, exercising on the treadmill, singing, physical interventions, and feeding.
- Individuals receiving services are required to wear face coverings, if they can medically tolerate wearing a mask, whenever social distancing cannot be achieved.

The Day Habilitation Coordinator/Supervisor will ensure the following:

- That groupings of staff/individuals receiving services are as static as possible by having the same group of individuals work with the same staff whenever and wherever possible.
- Group size will be limited to no more than six (6) individuals receiving services per day. The restriction on group size does not include employees/staff.
- That different stable groups of up to six (6) individuals have no or minimal contact with one another nor utilize common spaces at the same time, to the greatest extent possible. Maintain a staffing plan that does not require employees to “float” between different rooms or groups of individuals, unless such rotation is critical to safely staff individuals due to unforeseen circumstances (e.g. staff absence). There is a modified use and a restricted number of program rooms and seating areas to allow for social distancing of at least six feet apart in all directions (i.e. 36 square feet). When distancing is not feasible between workspaces, the program will require the use of face coverings or enact physical barriers, such as plastic shielding walls where they would not affect air flow, heating, cooling, or ventilation. Physical barriers are in place in accordance with OSHA guidelines. Shared workspaces and equipment are cleaned and disinfected.
between use. Prohibit the use of tightly confined spaces (e.g. supply closets, equipment storage areas, kitchens, vehicles, or restrooms) by more than one person at a time, unless both individuals and staff sharing such space are wearing acceptable face coverings.

- Even with face coverings in use, occupancy will not exceed 50% of the maximum capacity of the space or vehicle, unless it is designed for use by a single occupant.
- The Day Habilitation Program will increase ventilation with outdoor air to the extent possible (e.g. open program room and vehicle doors and windows), unless such air circulation poses a safety or health risk (e.g., allowing pollens in or exacerbating asthma symptoms) to individuals using the facility.
- The Day Program Coordinator/Supervisor will prohibit congregation in lobbies, hallways, and waiting areas.
- The Day Habilitation Programs are set up to reduce bi-directional foot traffic using arrows affixed to the walls that show the flow of traffic. Social distancing may not always be possible when caring for individuals with higher medical, behavioral, or adaptive support needs. Their specific treatment plans may necessitate physical contact to ensure health and safety during activities of daily living (e.g. toileting, eating etc.), behavior intervention techniques (e.g. physical restraint) or medical treatments (e.g. administration of daily medication or first aid etc.). All appropriate personal protective equipment and hygiene will be utilized. Staff who are unable to medically tolerate wearing a mask will be referred to Human Resources for Administrative Follow Up.

C. Gatherings in Enclosed Spaces

- The Senior Vice President of Developmental Disabilities Services prohibits gatherings of more than 15 people (excluding staff) in a shared space, at any given time at the Day Habilitation Program(s). Rooms have been reconfigured and repurposed to limit density and expand usable space.
- Program Areas will include the same grouping of individuals with the same staff each day to the extent possible and will avoid crossing programs with other rooms.
- To the best extent possible program areas will space out seating (6 feet apart) and use floor markers to designate six-foot distances. Additional seating above designated room capacity will be removed.
- The Day Habilitation Coordinator/Supervisor will provide adequate space for required staff to adhere to social distancing while completing independent tasks (i.e. paperwork) and when taking breaks (e.g. eating).
- The Day Habilitation Coordinator/Supervisor will ensure that individuals do not share food and beverages. In addition, the Day Habilitation Coordinator/Supervisor will communicate that food brought from home should require limited preparation at the day program site (i.e. heating in microwave) and be packed appropriately. All reusable food utensils and storage containers will be washed in the dishwasher on the hottest wash and dry setting.
- The use of large cafeteria and buffet-style dining has been discontinued.
- Mealtime activities will be staggered to allow for social distancing and disinfection in-between use. Lunch will occur within the pre-assigned groups of six (6) or less in each program area.
Day Program Schedules and Activities

- The Day Habilitation Program schedule and activities have been modified to allow service provision while reducing the size of groups (4-6 individuals) to facilitate the ability to practice 6ft social distancing and to mitigate the spread of infection.

- The Day Habilitation Program provides for adequate space and operational practices.

D. Personal Protective Equipment

The Day Habilitation Program(s) have an adequate supply of required PPE at all program locations. All staff and essential visitors are required to wear a face covering or mask and will be provided one for use onsite according to the St. Dominic’s Family Services PPE policy.

- The Day Habilitation Program will comply with OSHA standards applicable to each specific work environment.

- Staff can choose to provide their own face covering, however, are not required to. Acceptable face coverings may include, surgical masks, N95 respirators, face shields and/or cloth masks (e.g. homemade sewn, quick cut, bandana). Any personally supplied face coverings will adhere to standards for professional/workplace attire. Cloth, disposable or homemade masks are not appropriate for workplace activities that require a higher degree of protection for personal protective equipment due to the nature of the work.

- Activities that typically require a higher degree of protection are exercising on the treadmill, singing, physical interventions, and feeding.

- All face coverings must be cleaned or replaced after use and may not be shared.

- All Day Habilitation Program staff will be trained on the proper use of PPE including when to use and donning, doffing, disposing, and/or reusing and sanitizing when appropriate. Documentation of such trainings will be retained in the employee’s training records and in the nursing office.

E. Hygiene and Cleaning

All staff, management and essential visitors are required to pay strict adherence to hygiene and sanitation requirements to reduce transmission as advised by DOH “Guidance for Cleaning and Disinfection of Public and Private Facilities for COVID-19,” and the “STOP THE SPREAD” poster, as applicable. This signage will be posted at the day program.

To the extent it is applicable, the Day Habilitation Coordinator and staff are required to implement the following minimum standards:

- Maintain an adequate stock of cleaning and EPA approved disinfecting agents.

- Conduct daily cleaning and rigorous disinfection of high-risk areas (i.e. bathrooms, nursing stations) and high touch surfaces.

- The Day Habilitation Coordinator/Supervisor will consult with the Vice President of Facilities Management to ensure proper dwell times for all cleaners, sanitizers and disinfectants per manufacturer recommendations as indicated on the product label and ensure adequate
ventilation to prevent inhaling toxic fumes. The Day Habilitation Programs will use only EPA registered products for disinfecting non-porous surfaces.

- The Day Habilitation Coordinator/Supervisor will maintain site cleaning logs indicating the date, time, and scope of cleaning.
- The Day Habilitation Coordinator/Supervisor will ensure that cleaning products, sanitizers and disinfectants are kept secure and out of reach of individuals who may misuse (i.e. consume, dump out etc.). Products will be locked in a separate supply closet or cabinet, with only staff having key access.
- After sanitizing or disinfecting any gloves, paper towels or other disposable items used will be immediately discarded. These will be tied in a trash bag and removed from the environment to prevent individuals from accessing potentially contaminated or hazardous materials.
- The Day Habilitation Coordinator/Supervisor will ensure that cleaning products, sanitizers and disinfectants are kept secure and out of reach of individuals who may misuse (i.e. consume, dump out etc.). Products will be locked in a separate supply closet or cabinet, with only staff having key access.
- The Day Habilitation Coordinator/Supervisor will limit use of shared objects/equipment and ensure they are cleaned and sanitized after each use. Items that cannot be cleaned and sanitized will not be used (i.e. soft toys, cloth placemats, etc.) Individuals will not be permitted to bring such personal items from home.
- The Day Habilitation Coordinator/Supervisor will implement measures to limit the sharing of objects, such as electronic equipment, arts and craft materials, touchscreens, as well as the touching of shared surfaces to the extent possible.
- All employees will be required to wear gloves (trade-appropriate or medical) when in contact with shared objects or frequently touched surfaces; or, require workers and individuals to practice hand hygiene before and after contact.
- If cleaning or disinfection products or the act of cleaning and disinfecting causes safety hazards, staff will be reminded to use PPE as needed followed by hand hygiene. Staff will use cleaning/disinfecting wipes for electronics and will not use sprays. The Day Habilitation Coordinator will limit the number of people using the equipment when proper cleaning/disinfecting of such items are not possible.
- Day Habilitation Coordinator/Supervisor will provide and maintain hand hygiene stations throughout each location where possible to include:
  - Handwashing: soap, running warm water, and disposable paper towels.
  - Hand sanitizing: Alcohol-based hand sanitizer containing at least 60% alcohol for areas where handwashing facilities may not be available or practical. Hand sanitizer will be available to be utilized frequently throughout the day.
  - All staff and individuals will be reminded to wash their hands frequently with soap and water, for at least 20 seconds upon arriving the site before handling food, before and after eating and drinking, using the bathroom, after touching shared objects or surfaces, after touching their eyes, nose or mouth, or after cleaning, sanitizing or disinfecting surfaces or when hands are visibly dirty. Use of alcohol-based hand sanitizers with at least 60% alcohol will be provided. Use of hand sanitizer by individuals will be supervised by staff as needed.
The Senior Vice President of Developmental Disabilities Services will ensure that CDC guidelines on “Cleaning and Disinfecting Your Facility” is followed if someone is suspected or confirmed to have COVID-19 infection:

- The Day Habilitation Coordinator/Supervisor will close off areas used by a person who is sick. The Day Habilitation Program will not close operations if able to close off the affected areas.
- The Day Habilitation Coordinator/Supervisor will open outside doors and windows to increase air circulation in the area.
- The Day Habilitation Coordinator/Supervisor will wait 24 hours before you clean or disinfect. If 24 hours is not feasible, wait as long as possible.
- The Day Habilitation Coordinator/Supervisor will clean and disinfect all areas used by the person who is sick such as offices, classrooms, bathrooms, common areas, and shared equipment.
- Once the area has been appropriately disinfected, it will be opened for use. Staff and individuals without close contact with the person who is sick will be able to return to the area after disinfection.

All staff at the Day Habilitation Program(s) will follow NYS DOH and OPWDD guidance related to reporting and contact tracing in the case of a positive or presumed positive COVID-19 individual or staff.

F. Transportation

The Senior Vice President of Developmental Disability Services will ensure that the following measures are in place in order to transport individuals to/from day programming:

- Only individuals and staff traveling to and from the same St. Dominic’s Day Program location will be transported together.
- Individuals or staff from other St. Dominic’s Day Program Locations would not be intermingled for purposes of transportation at this time.
- To the extent possible Individuals will be cohorted for purposes for day programming also, to further reduce intermingling.
- Individuals and staff who reside/work together in the same home may be transported together to day program(s) in the same vehicle without a vehicle capacity reduction.
- Capacity on buses, vans, and other vehicles transporting individuals from multiple residences will be reduced to 50% of total capacity to maximize social distancing and reduce COVID-19 transmission risks.
- The Day Habilitation Program(s) will be utilizing staggered arrival and departure times to reduce density during these times.
- To the extent possible, individuals and staff from different households will be required to restrict close contact by not sitting near each other or the driver. The use of directional tape and signage will be utilized to assist in accomplishing this. Individuals will be directed to not exit the vehicle at once, instead individuals will be directed to follow the driver or staff instruction on exiting one person at a time.
To the extent they can medically tolerate one, individuals, staff, and the driver will wear face coverings at all times in the vehicle. Social distancing will be maintained for individuals who cannot tolerate wearing a mask and, when possible, such individuals will be transported alone or with members of the same household. Staff who cannot medically tolerate the use of a face covering will be referred to Human Resources for administrative follow up.

After each trip is completed, the interior of the vehicle will be thoroughly cleaned by staff before additional individuals are transported.

Where appropriate and safe, windows will be rolled down to permit air flow.

G. Tracing and Tracking

The Senior Vice President of Developmental Disability Services or designee will notify the local health department and OPWDD immediately upon being informed of any positive COVID-19 test result by an individual or staff at the site.

In the case of a staff or visitor testing positive, the Senior Vice President of Developmental Disability Services will cooperate with the local health department to trace all contacts in the workplace and notify the health department of all staff, individuals and visitors who entered the facility dating back to 48 hours before the staff began experiencing COVID-19 symptoms or tested positive, whichever is earlier, but maintain confidentiality as required by federal and state law and regulations.

Staff who are alerted that they have come into close or proximate contact with a person with COVID-19, and have been alerted via tracing, tracking or other mechanism, are required to self-report to the Day Habilitation Coordinator/Supervisor or Senior Executive Vice President of Human Resources and Workforce Development at the time of alert and shall follow all required protocols as if they had been exposed at work.
Appendix

St. Dominic’s Family Services COVID-19 Entrance to Site-Based/Participation in Community Based Program Protocol

St. Dominic’s Family Services COVID-19 Screening Procedure

St. Dominic’s Family Services COVID-19 Day Program Health Screening Form

St. Dominic’s Family Services COVID-19 Health Screening Consent and Release Form

St. Dominic’s Family Services Cleaning Checklist