



INTEGRATED HEALTH PARTNERS COVID-19 PREPAREDNESS AND RESPONSE PLAN

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COVID-19 PREPAREDNESS AND RESPONSE PLAN

Integrated Health Partners (IHP) takes the health and safety of our employees seriously. This preparedness and response plan was developed to document the process and efforts put in place to ensure IHP offers a safe and healthy work environment for all staff and visitors who enter IHP's facility. Over time, this plan may need to be adjusted as new information becomes available.

We are all living through the spread of COVID-19 and the need for meeting business needs for essential functions at IHP as well as supporting our members' practices. This plan will help ensure IHP is prepared for working face to face in a safe manner. IHP is committed to reducing the risk of exposure to COVID-19 and are prepared to provide a healthy and safe workplace for our employees, customers and guests.

Our plan is based on information and guidance from the Centers for Disease Control (CDC) and the Occupational Health and Safety Administration (OSHA) at the time of its development. Because the COVID-19 situation is frequently changing, the need for modifications may occur based on further guidance provided by the CDC, OSHA, and other public officials at the state or local levels. IHP is focused on four lines of defense:

1. Creating a workspace that provides a sense of security to all employees with appropriate protections and processes in place for a safe work environment;
2. Limiting the number of people together at the same time in the same place;
3. Requiring appropriate personal protective equipment (PPE) including face coverings while in public or common areas within IHP when required; and
4. Sanitizing all areas routinely.

IHP has developed this plan with the following primary objectives:

1. Ensuring the safety and wellbeing of IHP staff;
2. Ensuring viability and sustainability of IHP operations and supporting member practices; and
3. Ensuring compliance to regulatory requirements and in meeting the expectations of current state and federal requirements.

Note: *IHP may amend this plan based on changing requirements and the needs of our business.*

The spread of COVID-19 in the workplace can come from several sources:

- Co-workers
- Customers
- Guests - visitors/vendors/family members
- The general public

Our employees fall into one or more of the following categories as defined by OSHA:

- Lower exposure risk: the work performed does not require direct contact with people known or suspected to be infected with COVID-19 or frequent close contact with the public.
- Medium exposure risk: the work performed requires frequent and/or close contact with people who may be infected with COVID-19, but who are not known COVID-19 patients, or contact with the general public in areas where there is ongoing community transmission.

COVID-19 WORKPLACE COORDINATORS (TASK FORCE)

IHP has designated the following staff as its COVID-19 Workplace Coordinators (or other designee as needed):

Susan Cook, Executive Director Email: cooks@integratedhealthpartners.net Phone: 269-425-7110	April Kuehn, Associate Executive Director Email: kuehna@integratedhealthpartners.net Phone: 269-425-7131
Nichole Clayton, Director of Operations, Corporate Compliance Officer Email: claytonn@integratedhealthpartners.net Phone: 269-425-7140	Jessica Parks, Business Operations Manager Email: parksj@integratedhealthpartners.net Phone: 269-425-7112
Samantha Davis, Business Operations & HR Coordinator Email: daviss@integratedhealthpartners.net Phone: 269-425-7128	

The Coordinators' responsibilities include:

- Staying up to date on federal, state and local guidance;
- Incorporating those recommendations into our workplace;
- Training our workforce on control practices, proper use of personal protective equipment, the steps employees must take to notify our business of any COVID-19 symptoms or suspected cases of COVID-19;
- Reviewing HR policies and practices to ensure they are consistent with this Plan and existing local, state and federal requirements;
- Posting and/or communicating required notices, policy updates, and COVID-19 response plan for access by employees, visitors, and IHP members; and
- Maintaining appropriate records for complying with regulatory requirements.

RESPONSIBILITIES OF INTEGRATED HEALTH PARTNERS LEADERSHIP

All IHP leadership must be familiar with this plan and be ready to answer questions from employees. Additionally, IHP expects that all leadership will set a good example by following this plan. This includes practicing good personal hygiene and worksite safety practices to prevent the spread of the virus. IHP's leadership team must encourage this same behavior from all employees.

IHP will require and keep a record of all self-screening protocols for applicable employees or contractors entering the worksite, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed cases of COVID-19. IHP utilized a daily pre-screening tool prior to having all employees fully vaccinated. Daily screening via Survey Monkey or by paper is no longer required for all vaccinated staff members, however, employees are expected to continue to self-monitor for covid-like symptoms. Visitors to IHP will continue to be asked to complete the covid screening and to wear a mask when inside IHP facilities until seated in a conference room where plexiglass barriers are available and socially distanced.

IHP will:

- Provide adequate workspace to keep everyone on the worksite premises at least 6 feet from one another to the maximum extent possible, including using ground markings, signs, and physical barriers, as appropriate.
- Provide appropriate PPE (as needed) including face coverings to all employees, to include non-medical grade cloth face coverings that are washable and reusable, as well as surgical masks for when IHP employees may need to go into a member practice for business purposes.
- Require face coverings to be worn when employees cannot consistently maintain 6 feet of separation from other individuals in the workplace or when walking through common areas.
- Provide a face mask for visitors coming into IHP for face-to-face meetings or education events.
- Increase facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (e.g., desks, phones, tables, door handles, light switches, water cooler, kitchen areas).
- Implement daily protocol for disinfecting requirements using a departmental checklist.
 - Assignments per department for wiping down designated common areas every morning
 - Wipe down every surface after meetings in conference rooms
 - Wipe down personal office space at least daily, including phone, computer keyboard, mouse, and flat surfaces
 - Wash hands with soap and water for 20 seconds frequently
 - Use hand sanitizer if unable to wash hands
- Adopt protocols to clean and disinfect the facility in the event of a positive COVID-19 case in the workplace.
- Make cleaning supplies available to employees upon entry and at the worksite and provide time for employees to clean their workstation, wash hands frequently or to use hand sanitizer.
- Determine and categorize risk exposure for employees based on job responsibilities.
- When an employee is identified with a confirmed case of COVID-19, within 24 hours, attempt to notify both:
 - The local public health department, and
 - Any co-workers, customers, contractors, or suppliers who may have come into contact with the person with a confirmed case of COVID-19.
- Require a daily self-screening protocol for contractors entering the workplace, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19.
- Provide COVID-19 training to employees on the following:
 - Workplace infection-control practices,
 - Appropriate social distancing requirements (visual and verbal instruction)
 - Proper use of PPE (Visual and verbal demonstration of wearing face mask and proper care/disinfecting for re-use), and
 - How to report unsafe work conditions.
 - Visual and verbal demonstration of proper use and disposal of gloves (as needed)

RESPONSIBILITIES OF EMPLOYEES

We are asking each of our employees to help with our prevention efforts while at work. IHP understands that in order to minimize the impact of COVID-19 in our office, everyone needs to play his or her part. We have instituted several best practices to minimize exposure to COVID-19 and prevent its spread in

the workplace. This includes specific cleaning efforts and social distancing, as well as adherence to the requirements or current CDC guidance for PPE in the workplace. While at work, all employees must follow these best practices for them to be effective. Beyond these best practices, we require employees to report to their managers immediately if they are experiencing signs or symptoms of COVID-19, as described below. If employees have specific questions about this plan or COVID-19, they should ask their manager.

- Prior to reporting to work onsite at IHP or any member practice, employees are required to self-monitor for any covid-like symptoms. If symptoms are present or the employee has a fever of 100.4 degrees or higher, do not report to work.
- Employees should never report to work with a fever.
- Notify your manager immediately if you are experiencing symptoms that are unusual to your normal state of health. Some examples of follow-up questions may include:
 - Have you done anything recently that might be causing any of these symptoms?
 - Are the symptoms at a state that you would consider contacting your PCP for further guidance and/or to seek testing for COVID-19?
 - Depending on the severity and type of symptoms experienced, an interactive verbal conversation with your manager may determine if the use of PBT is appropriate.
- Wear a face mask within IHP or member practices, while in common areas, meeting rooms when not socially distanced from others, bathrooms, or other areas commonly occupied by other staff or visitors, or where 6 feet distance cannot be maintained.
- IHP employees must wash their cloth face masks on a regular basis to ensure effectiveness and avoid contamination from using multiple days continuously.

OSHA AND THE CDC PREVENTION GUIDELINES

OSHA and the CDC have provided the following preventive guidance for all workers and employers, 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 anyone who is sick.
- Maintain appropriate social distance of 6 feet to the greatest extent possible.
- Employer ensures appropriate cleaning and sanitizing products are readily available for all employees and visitors:
 - Soap for washing hands
 - Single-use towels and tissues
 - Alcohol-based hand sanitizer
 - No-touch wastebaskets and disposable liners
- Employer maintains inventory of PPE on hand and source timely to ensure adequate supply
 - Require strict adherence to documenting inventory
 - Continue to identify sources for affordable and effective PPE
- Employees must familiarize themselves with the symptoms and exposure risks of COVID-19. The primary symptoms of COVID-19 include the following:
 - Fever of 100.4 degrees or higher or chills
 - New loss of taste or smell
 - Dry and/or persistent cough

- Shortness of breath or difficulty breathing
- New onset of headache
- New onset of tiredness or extreme fatigue
- Congestion or runny nose
- Muscle/body aches
- Abdominal pain
- Sore throat
- Diarrhea
- Nausea or Vomiting

If you develop a fever and symptoms of respiratory illness, do not report to work. You must notify your manager immediately through verbal conversation and consult your primary care provider. Similarly, if you come into close contact with someone showing these symptoms, you must notify your supervisor immediately, and we recommend you consult your primary care provider. We have the responsibility to work to identify and notify all employees who have had close contact with individuals with COVID-19 or covid-like symptoms.

“Close contact” is not brief or incidental contact with a person with COVID-19 symptoms. The CDC defines “close contact” as: being within 6 feet of a laboratory-confirmed COVID-19 patient for a cumulative 15 minutes in a 24-hour period starting from 2 days before illness onset (or for asymptomatic patients testing positive, 2 days prior to positive specimen collection).

HEALTH AND SAFETY PREVENTATIVE MEASURES FOR INTEGRATED HEALTH PARTNERS

IHP has put several best practices and measures in place to ensure the health and safety of identified groups of individuals. With each group of individuals, our plan is focused on four lines of defense – creating a safe work environment, limiting the number of people together at a time, requiring appropriate personal protective equipment, and sanitizing all areas.

Minimizing exposure from co-workers

IHP takes the following steps to minimize exposure from co-workers to COVID-19 by educating employees on protective behaviors that reduce the spread of COVID-19 and provide employees with the necessary tools for these protective behaviors.

- Maintaining social distancing guidelines of 6 feet from others to the greatest extent possible
- Observing and adhering to visual guidelines (i.e. tape on floors) for maintaining a safe distance from others
- Using physical barriers between open office spaces to provide additional protection
- Following a hybrid work schedule and staggering work schedules as business needs allow
- Requiring the use of PPE (face coverings) when in public or common areas within IHP or member practices
- Requiring frequent handwashing throughout the day
- Providing tissues, hand sanitizer, and no-touch trash bins to minimize exposure to infectious secretions

General Education

- Educating employees on physical boundaries and expectations for maintaining social distancing requirements
- Posting CDC information, including recommendations on risk factors
- Posting visual reminders in conspicuous areas regarding proper hand washing and respiratory etiquette, including posters in all shared restrooms
- Informing employees of the importance of good hand hygiene
 - Regularly washing hands with soap and water for at least 20 seconds is one of the most effective ways for employees to minimize exposure to COVID-19
 - If soap and water are not readily available, employees should use alcohol-based hand sanitizer that is at least 60% alcohol
 - If hands are visibly dirty, soap and water should be chosen over hand sanitizer
- Encourage good hand hygiene by ensuring that adequate supplies of soap and hand sanitizer are maintained and placing hand sanitizers in multiple locations
- Discourage handshaking and encourage the use of other non-contact methods of greeting
- When possible, avoid the use of other employees' phones, desks, offices, other work tools and equipment, and other commonly touched surfaces
 - If the above cannot be avoided, clean and disinfect them before and after use
- Provide education on proper use and disposal of PPE and disinfecting of cloth based/reusable PPE
- Ensure IHP does not discharge, discipline, or otherwise retaliate against any employee unable to work due to COVID-19 related reason

Social Distancing

- Limit in-person meetings, utilizing virtual meeting options when possible
- When meeting face-to-face
 - Conference Room A – no more than two people with one at each end of the table
 - Conference Room B – no more than two people
 - Board Room – no more than six people at the designated locations
 - Event Room – no more than 10 people
- Provide hybrid work schedule when possible
- Encourage and require social distancing to the greatest extent possible while in the workplace
- Encourage employees to minimize ridesharing unless all riders are fully vaccinated.
 - If this cannot be avoided, while in vehicles, riders must ensure adequate ventilation (i.e. windows down).
 - Masking is required if anyone is unvaccinated in the car, and recommended for all riders when in areas of high transmission
- Do not share food/serving utensils and food with other employees or guests
- Encourage alternative meeting locations, such as outside, or walking meetings when appropriate

Exposure to confirmed COVID case

- Report immediately all COVID exposure to your manager. Additional information may need to be gathered by HR to ensure appropriate documentation for response plan activation.
- Once exposed, you will be expected to quarantine at home for 10 days from exposure.
 - Monitor symptoms for 10 days, with day zero being the date you were exposed.
 - If exposure occurs in your home with another household member, you should obtain a rapid test with a negative result on day 10 to return to in-office work.

- If exposure occurs outside of the home, no need to retest on day 10 to return to in-office work as long as symptoms have not developed. Testing, however, is recommended just to be certain.
- Remote work is available for those working at home when asymptomatic.
- Testing too early may result in a false negative test. Consider retesting if symptoms develop or worsen after a negative test.
- Wear a mask indoors in public for 10 days following exposure or until a negative test is obtained.

When employee tests positive for COVID-19

- Employees with a positive COVID-19 test or is “suspected but unconfirmed” should contact the Business Operations & HR Coordinator for next steps.
- If a positive COVID test is confirmed, isolation begins with day zero as the date symptoms first appeared or when a positive covid result was received if asymptomatic.
- Isolation lasts for 10 days after symptom onset and after resolution of fever for at least 24 hours and improvement of other symptoms. Employees can return to in-office work on day 11 if symptoms are resolving.
- If the source of infection is known, identify if it was at the workplace or outside.
- If the infection was contracted inside the workplace, notify workers’ compensation carrier;
 - If employee is symptomatic, contact an HR representative for leave options;
 - Coordinate with IHP’s worker’s compensation carrier for placing the employee on workers’ compensation leave (with pay) if deemed work related and employee is unable to work due to symptoms; and
 - Record the infection in the employer’s OSHA 300 log.
- If employee is not symptomatic, he/she will be allowed to continue working remotely from home as coordinated with his/her manager through the isolation period.
- Ask employee if he or she grants IHP permission to disclose the fact that the employee has been confirmed positive for COVID-19 or is suspected, but unconfirmed.
 - If yes:
 - Notify employee’s manager that employee is confirmed positive for COVID-19 or is suspected, but unconfirmed and is placed on leave.
 - For everyone else, respond to inquiries by disclosing employee is on a leave of absence.
 - If no:
 - Notify employee’s manager only that employee is on a leave of absence for non-disciplinary purposes.
 - Regardless of yes or no:
 - Disclose identity of employee through any required notification to OSHA or the health department.
- Notify employee’s co-workers who may have come into close contact with the employee at work within two days prior to the onset of symptoms or positive COVID test, who may have been exposed to COVID-19 and may wish to see a health care provider.
 - It is important to conduct contact tracing thoroughly through the most recent 48 hours prior to onset of symptoms and report this information to the health department, based on when the employee became symptomatic.
 - If the employee conducted business offsite at any other office locations within the 48 hours immediately preceding the onset of symptoms, contact the office manager to inform of possible exposure to their staff.

- **DO NOT** identify the infected employee by name and to the greatest extent possible, avoid making any direct or indirect references that would lead co-workers to identify the employee.
- Notify known customers, vendors, or third parties with whom the employee may have come into contact, while at work within 48 hours prior to the onset of symptoms, that they may have been exposed to COVID-19 and may wish to see a health care provider. **DO NOT** identify the infected employee by name.
- To the extent reasonably possible, avoid making any direct or indirect references that would lead the person to guess the identity of the employee.
- Arrange for an enhanced cleaning of the employee's workspace, immediate surrounding area, and areas likely visited (break room, restroom, etc.).
- Respond to inquiries by CDC or public health authorities as received.
- Notify liability insurance carrier if any suspected negligence has occurred placing the organization at risk.

Restrict employees from the workplace if they display symptoms of COVID-19

- Any employee with COVID-19 symptoms (which is abnormal to your usual state of health) will be immediately separated from other individuals and sent home.
- Employees with active COVID-19 like symptoms are encouraged to contact their primary care provider.
- Guidance from the employee's health care provider or the local health department on their return-to-work date may be required.

Actively encourage sick employees to stay home

- If an employee is not able to report to work in person due to experiencing a fever or has symptoms related to COVID-10, please contact your manager immediately via a verbal conversation and also contact the Business Operations and HR Coordinator to understand the use of PBT or other leave options that may be available.
- Employees who are not able to work due to illness will not be permitted to work from home. The use of PBT will be required.
- IHP will follow federal, state and local guidance for return to work.
- Guidance from the employee's health care provider will also be considered.

Ensure the safety of IHP employees working onsite at member practices

- Empower employees to speak up if working on-site at a member practice and safety measures and protocols are not in place or consistent with COVID-19 safety guidelines (i.e. proper use of PPE, hand washing, social distancing, and monitoring patients and team members for COVID-19 related symptoms)
- The IHP employee is empowered to do the following:
 - Inform the practice of the appropriate safety protocol(s) and ask that the safety measure(s) be implemented immediately,
 - Leave the practice and return to IHP if corrections are not made immediately,
 - Report to IHP leadership observations made in the practice and any communication that followed the observation(s), and
 - An IHP leadership team member will reach out to the member practice as needed.
- Provide employee with disinfectant wipes and appropriate PPE for use in member practices in which the employee may be working for a prolonged period.

- If employee is exposed to someone at a member practice exhibiting COVID-19 like symptoms or a confirmed positive COVID-19 patient, employee will need to leave the office immediately and go home, and follow quarantine guidelines. Employee must contact their manager to determine appropriate next steps.

Possible scenarios employees may experience that will trigger action

- Employee does not feel well and calls in sick. Use of PBT is required.
- Employee does not feel well and has potential COVID-19 like symptoms which are abnormal to your usual state of health, contact your manager.
- Employee takes their own temperature at home and has a temperature of 100.4 or greater – stay home. Use of PBT is required.
- If an employee is caring for someone at home, based on quarantine rules, any decision to work from home is between you and your manager. (Each scenario may look different depending on the situation.)
- If an employee falls ill at work the following will occur:
 - Employee will be sent home, PBT may be applied, as applicable,
 - The employee must be fever free without medication for 24 hours and remain home for the duration required under current CDC guidance in effect at the time the employee falls ill,
 - Workspace of employee and surrounding areas will be disinfected vigorously,
 - Refer to Primary Care Physician for next steps,
 - Screen for other symptoms
 - Encourage employee to ask for order for testing (no member copay)
 - Consider if other employees need to be sent home, depending on the potential exposure.

If an employee has a confirmed case of COVID-19, Integrated Health Partners ensures the following

- We will communicate with co-workers.
- We will work with our local health department to provide them with the name of any identified employees that may have been exposed.
- We will report cases to OSHA via their reporting/recordkeeping requirements.
- IHP will follow CDC and state guideline protocols for return to work, including workplace contact tracing and CDC-recommended cleaning and disinfecting in all affected areas.
- Guidance from the employee's health care provider will also be considered.
- We will perform increased environmental cleaning and disinfection.

Minimizing exposure from those outside of our workforce including customers, visitors and vendors

- IHP business practices are continuously evaluated to ensure the safety and health of all individuals.
- When possible, IHP will limit the number of visitors in the facility.
- Any individual entering IHP for a meeting or visit, other than dropping off mail or supplies, will have their temperature checked and will need to complete a self-screening questionnaire upon entry.

- Individual symptoms will be observed and individuals displaying symptoms of COVID-19 will be asked to leave the workplace.
- Masks will be made available to visitors upon entry.
- Social distancing practices to be observed:
 - 6-foot distances are marked in areas where customers might gather/wait
 - In person meetings are to be made by appointment only
 - Limit the number of customers allowed into the workplace
 - Minimize face to face contact
- Information is posted throughout the worksite educating individuals on ways to reduce the spread of COVID-19.
- Physical barriers between IHP employees and customers have been considered in high volume areas (i.e. shielding at the front desk, barrier walls between open office spaces).

Other considerations/actions taken

- Employees should sanitize their work areas upon arrival, throughout the workday, and immediately before leaving for the day.
- We will all routinely clean and disinfect all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, elevator buttons and doorknobs.
- IHP provides disposable wipes so that commonly used surfaces (for example, doorknobs, keyboards, copiers, desks, other work tools and equipment) can be wiped down by employees before/after each use.
- Employees at a higher risk for serious illness due to COVID-19 will be encouraged to work remotely. If working remotely is not possible, additional precautions will be put in place to ensure their safety, including working in separate workspaces.
- IHP maintains a work environment where individual employees may have the ability to work remotely and at different times, in coordination with their manager and established remote work guidelines.
- Plans are developed to ensure essential business functions can occur timely and effectively.
- IHP took swift action to implement safe working protocols prior to making the decision to work remotely on March 18, 2020, ahead of any Executive Order requiring IHP to do so. Continuous monitoring for new guidance, active MDHHS orders, or other workplace requirements is conducted and shared with staff timely.
- During the COVID-19 pandemic, IHP has been transparent with staff and member practices about IHP's response to the current situation and ongoing efforts to maintain business operations. IHP will continue to communicate challenges, actions, and decisions to adjust business needs, as the public health emergency evolves.
- IHP has continually reviewed the current situation regarding the pandemic in Calhoun County and has conducted a thorough review to identify and mitigate risk for IHP employees and visitors.
- IHP had all carpets in IHP occupied space thoroughly cleaned and disinfected after employees started working remotely and maintains a cleaning protocol for staff and the external cleaning vendor.
- Physical barriers between open office seating have been installed, and some office reconfiguration has occurred to ensure adequate spacing between workstations.
- Staff seating arrangements have been adjusted in some offices to remove unnecessary exposure to multiple staff occupying an enclosed office setting with limited distance.

- Employees have been given a thermometer for self-testing if one was not available.
- IHP has procured touchless forehead thermometers that can be used in the event someone experiences symptoms (i.e. fever) during the workday.
- Posters have been posted in conspicuous areas reminding of COVID-19 symptoms, hand washing requirements, and coughing etiquette.
- Cashless and/or paperless transactions have been implemented where possible to pay invoices online and avoid handling of documents in person that can be performed electronically.
- The building landlord conducted an air quality test prior to IHP returning to work full time, to include presence of mold or other contaminants.
- Employees with children at home that are unable to care for themselves and are not able to have care provided by a third party as a result of COVID-19 limitations will be given consideration for remote work options.
- Employees considered at high risk due to underlying health factors or other conditions are encouraged to work with their manager regarding a remote work schedule that still allows for the essential functions of their job to be completed timely and effectively.
- IHP has provided resources and tip sheets for dealing with the impact of COVID-19 both on a personal as well as a professional level. We will continue to provide resources as we acquire them and encourage the use of IHP'S free EAP service through HelpNet as needed.

This Plan is based on information and guidance from the CDC, OSHA, MDHHS, and other regulatory bodies at the state and local levels at the time of its development. The safety of IHP employees and visitors remains the top priority at IHP. We recognize that all individuals are responsible for preventing the spread of COVID-19 and reducing the potential risk of exposure to our workforce and visitors. As the COVID-19 outbreak continues to evolve and spread, IHP is monitoring the situation closely and will update guidance based on the most current recommendations from the MDHHS, CDC, World Health Organization (WHO), OSHA and any other regulatory entities, as applicable.