



POST-PANDEMIC RE-OPENING PLAN

Optima Family Services, Inc. ("Optima") recognizes that in operating their business, there are risks of exposure to COVID-19 for employees, clients, and their families as it is highly contagious and has a mortality rate greater than the flu. In addition:

- COVID-19 can spread easily and exponentially
- While persons of all ages are at risk for catching COVID-19, individuals with compromised immune systems and the elderly may be at particular risk

In operating, **Optima** acknowledges the risks of COVID-19 exposure to its employees, clients, and their families and is committed to providing a safe and healthy business environment. To ensure that, the following Business Operation Plan (Plan) in response to the COVID-19 pandemic has been developed. All employees, including managers and staff, are responsible for implementing and complying with all aspects of this Plan to mitigate the potential for transmission of COVID-19 in our workplaces, and requires full cooperation among staff and management. Only through this cooperative effort can the safety and health of all staff and persons in our workplace be maintained and established. **Optima** managers and supervisors have full support and authority to enforce the provisions of this policy with families and staff.

Our staff are our most important assets, and we want to ensure that they and our clients and their families remain healthy and safe. We are serious about safety and health and keeping our staff working at **Optima**. Our Plan follows Centers for Disease Control and Prevention (CDC), California Department of Public Health (CDPH), as well as the federal OSHA standards related to COVID-19, and addresses the following:

1. Infection prevention measures;
2. Prompt identification and isolation of sick persons;
3. Engineering and administrative controls for social distancing, including reduced occupancy requirements;
4. Sanitation policies and procedures, including cleaning, disinfecting and decontamination;
5. Communications and training for managers and staff necessary to implement the plan; and
6. Procedures to ensure effective ongoing implementation of the plan.



1. INFECTION PREVENTION MEASURES

Personal Protective Equipment (PPE):

- Cloth masks will be distributed, allowing the staff member to wash it and reuse it daily
- Re-usable face shields will be distributed. Staff will have the option to either wear the mask, the shield or both.
- Gloves will be provided upon request as these are often counterproductive to proper sanitization. Staff will instead focus on frequent sanitizing and handwashing.
- Disinfectant and sanitation materials provided to staff will include:
 - Alcohol-based (70%+) hand sanitizer
 - Commercial strength sanitizing solution and microfiber washable cloth for disinfecting surfaces and materials

Sanitation and Respiratory etiquette:

- Directions will be provided to staff and visitors on proper handwashing procedures
- Directions will be provided to staff and visitors where they will be instructed to cover their mouth and nose with their sleeve or a tissue when coughing or sneezing and to avoid touching their face, in particular their mouth, nose and eyes, with their hands.
- All office areas will be frequently sanitized and touchless sanitizers in place throughout the offices.

External Risk Mitigation:

- Deliveries will be made in a contactless fashion and dropped at the front door. Delivery person will unload boxes. Once delivery person is at a safe distance a designated staff member will collect all shipment while wearing a mask (and gloves if needed). Staff member must dispose of gloves properly and immediately wash their hands.
- Client families will not be allowed to visit the office until further notice.
- Employees should visit the office only when necessary to pick up PPE or essential items. Staff will be asked to sanitize before entering and wear masks on entry.

2. IDENTIFICATION AND ISOLATION

Screening Process:

- Staff have been informed of, and encouraged to, self-monitor for signs and symptoms of COVID-19. Any staff member with a fever will not be allowed in the field to provide sessions. Same applies for in-office staff that present a fever.
- Employees who have symptoms should notify their supervisor and stay home.



- In-office staff will have their temperature read before entering the office at the start of their shift. Touchless thermometers will be used by HR staff.
- Screening and evaluating staff who exhibit signs of illness will occur daily. If a staff is identified as ill, they will be asked to either work from home or take a sick day.
- Families will be asked the following screening questions during scheduling calls:
 - Have you, or anyone in your household, been in exposed to someone who tested positive for COVID-19?
 - If so, when was the last time of contact? If less than 2 weeks, the “Quarantine Process” outlines below must be followed.
 - Are you showing or have you had any of the following symptoms in the past two weeks: fever, cough, shortness of breath? If so, sessions will be placed on a 14-day hold.
 - In accordance with the Department of Developmental Services (DDS) Optima must notify the corresponding Regional Center if a client or anyone who resides in the client home has tested positive for COVID-19

Sick Leave Policy:

- Policy has been implemented to protect the privacy of staff’ health status and health information (see “Attachment A” for the statement)
- If there is a positive contact with COVID 19, all employees will be notified, but the source will not be identified. Employees will be offered testing through workers comp policy on an as-needed basis.

Quarantine Process:

- Those employees that report mild symptoms will be asked to remain at home until symptoms subsided for at least 72 hours.
- Those employees that present with COVID-19 symptoms to remain home for 14 days in self-quarantine.
- Employees that test positive for COVID-19 must be symptom free for 14 days before returning to work.
 - Sick employees should follow CDC-recommended steps. Employees should not return to work until the criteria to discontinue home isolation are met, in consultation with healthcare providers.
- Employees who are well but who have a sick family member at home with COVID-19 should notify their supervisor and follow CDC recommended precautions.
- Client families that report COVID-19 symptoms will not receive in-home services for 14 days while in self-quarantine.
 - Regional Center Service Coordinators and insurance carrier representatives will be informed of the services being placed on a temporary “hold.”



- Client families that test positive for COVID-19 must be symptom free for 14 days before resuming sessions.
 - Individual Service Coordinators and insurance carrier representatives will be informed of the services being placed on a temporary “hold.”
- Telehealth will be offered only as Regional Center and health insurance providers allow. Optima has no independent control over this option, but will make it available whenever possible.

3. PROTOCOLS FOR SOCIAL DISTANCING

Social distancing is being implemented in the workplace through the following engineering and administrative controls.

Employees:

- In-office staff will be seated with at least 6 feet of distance from one another. Communal areas will be assigned time frames for proper distancing guidelines. There will be no office-wide meetings until 2021.
- Field staff should observe proper social distancing in the home.
- We recognize that social distancing is impossible from children to provide a proper service, we ask social distancing from other adults in the home.
- There will be no in-person staff meetings for the duration of 2020. Zoom virtual trainings will be held in their place.

Clients:

- Social Skills group will no longer be held every Friday in the Rancho Cucamonga office. Social Skills group has been cancelled until further notice to abide by social distancing guidelines and minimize risk of exposure.
- No social events will take place for the remainder of 2020. Social events for family engagement may resume in 2021 if allowed by proper authorities.
- If there is an option for outdoor sessions, these will only be allowed if proper social distancing is observed (i.e. at the park or library).

4. SANITATION POLICIES AND PROCEDURES

Employee Hygiene:

- Handwashing guidance and instruction to be followed **strictly** as outlined in the IIPP (see “attachment B”) and advised by the CDC.



- Field staff to ask families to allow them to wash their hands prior to starting session and the conclusion of session
- Any family member that will participate in the session will also be asked to wash their hands before the session can begin.
- Field staff to sanitize in the home throughout the session as needed and upon leaving the home
- Handwashing requirement after handling external elements (e.g. mail and packages, currency, etc.) for all in-office staff.
- Requirement to use hand sanitizer between handwashing frequently in the office.

Facility Housekeeping:

- General Workplace Environment will be cleaned and sanitized every week, on Fridays
- Frequent cleaning and disinfecting will be conducted in high-touch areas, such as phones, keyboards, touch screens, controls, door handles, elevator panels, railings, copy machines, etc. at the start and end of the day. HR will handle this process.
- In-office employees will not be allowed to share workspaces and should not use another person's desk, keyboard, mouse, phone, or other equipment.
- No more than 2 employees will be permitted in the lunch-break area at a time so that social distancing of 6 feet is possible. Meal breaks will be staggered to accommodate this. Employees will continue to have the option to eat off-site or in their own offices.

Materials in the Field

- Field employees will be taking only minimal items into the clients' homes.
- Whenever possible, and as advised by Regional Center, field staff should use materials available at the client homes.
- If certain toys are needed, the field employee should take only toys that are plastic, can be easily disinfected, and non-porous.
- If necessary, field staff should prepare small individual bags of items per client. The bag is to be a clear gallon sized bag that can be disinfected. These items can only be used with ONE family per day and must be disinfected at the conclusion of the workday.
- Field staff must not take their big duffle bags of toys into client homes. Only materials that fit in a gallon-sized bags will be allowed per client, per home.



5. COMMUNICATIONS AND TRAINING

Plan Development:

- Plan was developed with input from the following staff: Vice president and General Counsel based on guidelines and procedures from the CDC, DPH and OSHA.
- This Plan will be shared with employees, client families, Regional Centers, and insurance carriers.
- Weekly department check-ins and transparent communication will continue following the re-open. Field staff will continue to meet with their field supervisors on a weekly basis.
- Wonder Wednesday via Zoom will continue for the remainder of 2020 in lieu of staff meetings.
- Company wide alerts and updates will be provided to staff via email and Zoom trainings set up as needed to address policy changes and updates.

Initial Business Operation Plan Implementation:

- This Business Operation Plan was communicated to all staff on **6/5/20** in the following way: via email to all staff.
- Field Supervisors to meet with their respective teams to answer questions on the Re-Opening Plan.
- Zoom meeting to be held as needed for clarity and questions with VP and General Counsel.

6. ONGOING IMPLEMENTATION

- Managers and supervisors are to monitor how effective the Plan has been implemented by both in-office and field staff. Compliance will be assessed on a weekly basis during department check-ins.
- In response to feedback, Optima will make changes as necessary and properly communicate this to staff and families.
- Management and staff are to work through this new program together and update the training as necessary. Trainings may include the following:
 - Zoom virtual meetings
 - In office training with proper PPE and social distancing



Attachment A

SICK LEAVE PRIVACY POLICY AND STATEMENT

The Occupational Safety and Health Administration (OSHA) enforces the OSH Act, which requires employers to take reasonable precautions to ensure employee safety and prohibits employers from placing their employees in situations likely to cause serious physical harm or death.

The uncertainty associated with the coronavirus (COVID-19) has created a situation where Optima may inquire of employee's health and take extra precautions to prevent the spread of COVID 19.

Generally, the Americans with Disabilities Act (ADA) and California's Fair Employment Housing Act (FEHA) prohibit employers from requiring employees to undergo medical examinations unless the examinations are "job-related and consistent with business necessity." However, the California Department of Fair Employment & Housing recently issued guidance stating: "Generally, measuring an employee's body temperature is a medical examination that may only be performed under limited circumstances. However, based on current CDC and local public health information and guidance, **employers may measure employees' body temperature for the limited purpose of evaluating the risk that employee's presence poses to others in the workplace as a result of the COVID-19 pandemic.**"

If Optima learns that an employee has tested positive for COVID-19, then that information is protected under HIPAA. Optima may make disability-related inquiries and require medical examinations only if inquiries and examinations are "job related and consistent with business necessity." Otherwise the employee will simply be allowed to work remotely from home in cases where this is feasible. Otherwise, employee can take sick leave.

Moreover, under the confidentiality provisions of HIPAA and related laws, only those who 'need to know' may know about the diagnosis and Optima will not disclose employee names. Optima will conduct a discreet, but thorough investigation of other persons that may have been exposed to a positive COVID-19 person and inform them of the potential exposure.

Optima will work with local public health officials to get guidance on how to get exposed employees tested. HIPAA generally permits a health plan to disclose protected health information (PHI) to a public health authority to prevent or control the spread of an infectious disease.

Public health officials may decide to contact anyone who has been exposed to a co-worker with the virus.



Attachment B

RELEVANT PORTIONS OF THE IIPP

Universal Precautions - Components

The principles of infection control remain constant, whether COVID-19 or other infectious agents are the cause for concern. The components of Universal Precautions include:

1. Personal protective equipment, e.g., wearing masks, gowns, eye protection and other protective gear;
2. Hand washing,
3. Decontamination, e.g., appropriate cleaning methods to decontaminate surfaces, objects, etc. and;
4. Waste disposal, e.g., liquid, or non-liquid form, double bagging, and labeling.

Treat all human blood and potentially infectious body fluids as contagious

Treat all human blood and potentially infectious body fluids as if they are known to contain blood borne pathogens. Those potentially infectious body fluids are:

- a. blood
- b. vaginal secretions
- c. semen
- d. any bodily fluid that you can't identify
- e. fluid that has visible blood present

Precautions should be taken when handling stool, urine, nasal secretions and vomitus. Staff is not to handle the above-mentioned secretions and bodily fluids unless it is an emergency and parent/caregiver cannot handle the situation themselves. If staff does handle these secretions and/or bodily fluids, they are to follow universal safety components labeled at the beginning of this section.

Hand Washing

The second component of Universal Precautions is Hand washing. Hand washing is one of the most important defenses against the spread of infectious disease. Children's hands and adult's hands should always be washed with soap and running water following contact with blood or



other potentially infectious body secretions, as described above, even if gloves have been used for the task. Do remember that hand washing is the most effective way to reduce the spread of disease.

Use soap. Liquid is best and warm running water.

Rub hands together vigorously for at least 30 seconds.

Remember all surfaces including thumbs, wrists, back of hands, between fingers and around and under nails.

Rinse hands well, letting water drain from wrists to fingers - don't turn off faucet.

Dry hands with paper towel, then use same towel to turn off faucet.

Discard towel.

Products such as moistened towelettes and antiseptic hand cleaners do not replace the need for hand washing as soon as possible following exposure. Antiseptic hand cleaners are effective alternatives if running water is not available.

Always wash hands

Remember: The times to always wash hands are:

When you arrive at the client home

Before and after giving medications

Before beginning care/first aid

Before and after using the bathroom

In-between delivery of care/first aid

Before handling clean equipment and after handling dirty equipment

Before and after eating

Before handling food

Before leaving the client home

Use hand sanitizer generously throughout your working day.



Avoid exposure to bodily fluids of clients that have medical equipment. If you feel uncomfortable handling a client, please ask parent or nurse for assistance. Ask caregiver to clean/wipe any secretions.

Personal Hygiene

Personal hygiene as well as eating or drinking should not take place where there is a possibility of exposure. There should be no eating, drinking, smoking, applying make-up, handling contact lenses, etc., in areas in which first aid is provided.