

# Laura Baker Services Association COVID-19 Preparedness Plan

Laura Baker Services Association (LBSA) has adopted this COVID-19 Preparedness Plan to provide a safe and healthy workplace and to minimize the risk of transmission of COVID-19 for our staff, clients, and the community we serve. Providers licensed or certified by the Department of Human Services to deliver residential services are required to follow guidance from the Minnesota Department of Health (MDH) and the Centers for Disease Control and Prevention (CDC) to mitigate the spread of COVID-19. This plan is intended to policy is intended to comply with all applicable federal, state, and local laws and regulatory guidance, including the OSHA COVID-19 Healthcare ETS as applicable to the Intermediate Care Facility, also known as Oak Street Services (OSS).

LBSA's Preparedness Plan addresses the following locations: program offices at 211 Oak Street (referred to in this plan as LBSA Center), as well as the intermediate care facility (ICF) residences located on its Oak Street campus (currently 3) and the 7 adult foster care residences served through the Community Services Program. The ICF residences and Community Services residences are substantially similar and therefore LBSA has developed a single plan, with site-specific considerations included below.

Facility Location	Worksite-Specific COVID-19 Considerations
ICF Residences	Resident clients are less likely to tolerate masks and less likely to be able to consistently follow social distancing guidelines
Community Services Residences	Resident clients are more likely to tolerate masks and more likely to be able to consistently follow social distancing guidelines
Laura Baker Center (program offices)	Administrative offices where direct care services are not being provided

## Roles and Responsibilities

LBSA's goal is to prevent the transmission of COVID-19 in the workplaces. Managers as well as non-managerial staff are all responsible for supporting, complying with, and providing recommendations to further improve this COVID-19 plan.

The COVID-19 Safety Coordinator has LBSA's full support in implementing and monitoring this COVID-19 plan, and has authority to ensure compliance with all aspects of this plan. The COVID-19 Work Group also meets regularly to review changing conditions and recommend action.

COVID-19 Safety Coordinator		
Penny Hillemann	Assistant Program Director	<a href="mailto:penny.hillemann@laurabaker.org">penny.hillemann@laurabaker.org</a>

Staff input and concerns are solicited in various ways including OSS and CS management team and household team meetings. Staff with questions, suggestions, or concerns about LBSA's COVID-19 plan

are welcome to contact the Safety Coordinator or to also email the COVID-19 Work Group at [covidinfo@laurabaker.org](mailto:covidinfo@laurabaker.org).

## Vaccination Policy

LBSA has developed the following policies and procedures to determine employees' vaccination status and ensure the safest environment for our clients and employees:

**Mandatory COVID-10 Vaccination Policy**, adopted November 2021, as amended – found in the LBSA Policy Manual. This policy requires all LBSA employees to demonstrate by January 4, 2022, that they are fully vaccinated or obtain a religious or medical exemption as an accommodation. Employees hired after that date are required to take immediate action to come into compliance with the policy.

The policy provides for medical or religious exemptions upon adequate documentation. Staff so exempted, and new hires not yet fully vaccinated, will be tested weekly.

Staff are strongly encouraged to receive booster doses for which they become eligible.

## Reporting to and Working with MDH

LBSA will follow MDH requirements for reporting COVID-19 cases in our facilities.

LBSA will work with MDH and comply with their directives when given, including conducting necessary assessments of exposure risk, hygiene, and source controls.

## Infection Prevention and Control

LBSA follows general Infection Prevention and Control protocols, as outlined in its Health Manuals for both Community Services and Oak Street Services.

LBSA will follow the CDC's guidance for healthcare workers during the COVID-19 pandemic:

- Interim Infection Prevention and Control Recommendations for Healthcare Personnel During the Coronavirus Disease 2019 (COVID-19) Pandemic  
<https://www.cdc.gov/coronavirus/2019-ncov/hcp/infection-control-recommendations.html> (9/10/2021 or as updated)

LBSA will implement policies and procedures for cleaning, disinfection, and hand hygiene, along with the other provisions required by OSHA's COVID-19 ETS (OSS), as part of a multi-layered infection control approach.

Signs are posted about hand hygiene and cough etiquette in all residences and in Laura Baker Center). Staff and clients have been encouraged to undertake consistent handwashing routines, after having been in a public place, prior to and after eating, after using the toilet, or after blowing your nose,

coughing, or sneezing. Staff and clients have been directed to avoid touching eyes, nose, and mouth with unwashed hands.

Tissues for proper cough/sneeze etiquette and trash receptacles are available throughout LBSA Center and the residences.

LBSA Center can limit the hours of the LBSA Center if necessary to reduce exposure. ABHR is present at a hand hygiene station in the entrance lobby. We expect that all visitors to LBSA Center will wear a mask for the duration of their visits. Our receptionist has masks available should a visitor not have their own.

Paper towels and trash receptacles have been placed in locations so a paper towel can be readily disposed of if/when operating the door.

## **Masks / Source Control and Personal Protective Equipment**

LBSA requires all staff providing direct support to don a surgical mask at the beginning of each shift and wear this mask, covering nose and mouth, for the duration of the shift, and specifically when in the presence of clients or co-workers, including occupying a vehicle with another person for work purposes.

The following are exceptions to LBSA's requirements for face masks:

1. When an employee is alone in a room or their workspace.
2. When fully vaccinated employees share a well-defined workspace where there is no reasonable expectation that a person with suspected or confirmed COVID-19 will be present.
3. While an employee is eating and drinking at the workplace, if each employee is at least 6 feet away from any other person, or separated from other people by a physical barrier.
4. When employees are wearing respirators.
5. When it is important to see a person's mouth (e.g., communicating with an individual who is deaf or hard of hearing) and the conditions do not permit a facemask that is constructed of clear plastic (or includes a clear plastic window). When this is the case, LBSA will ensure that each employee wears an alternative, such as a face shield, if the conditions permit.
6. Exceptions will be provided for a narrow subset of persons with a disability who cannot wear a facemask or cannot safely wear a facemask, because of the disability, as defined by the Americans with Disability Act (42 USC 12101 et seq.). When an exception applies, LBSA will ensure that any such employee wears a face shield, if their condition or disability permits it.
7. LBSA will provide accommodations for religious beliefs consistent with Title VII of the Civil Rights Act.

### **When Working With Clients**

Eye protection must be worn when working with clients (OSS) as long as the community COVID-19 transmission level is substantial or high, which is the case at the time of this update. Current transmission levels by county can be viewed at <https://covid.cdc.gov/covid-data-tracker/#county-view>.

When working with a client with a confirmed or suspected case of COVID-19, staff are required to wear full personal protective equipment (PPE).

- COVID-19 Personal Protective Equipment and Source Control Grids  
<https://www.health.state.mn.us/diseases/coronavirus/hcp/ppegrid.pdf>

PPE has been provided for each direct support staff to wear 1 mask/shift for the duration of the shift, and each staff has been provided eye protection that can be re-used. Instruction in the care, cleaning and storage of the mask and eye protection has been provided to each staff. Staff are trained on the proper doffing and disposal of source control and PPE.

Additional PPE in the event of positive cases, such as respirators, gowns, and gloves, is also located on each household and in the Health office within LBSA Center.

### **Staff Not Working With Clients**

Staff working in non-direct support roles (i.e. administrative team, administrative support, dietary, health team when not providing direct care) must wear at least a well-fitting cloth mask when working in LBSA Center and Millis Hall kitchen unless alone in a room or in well-defined areas where all staff present are fully vaccinated and there is no reasonable expectation that a person with suspected or confirmed COVID-19 will be present.

LBSA has identified the following well-defined areas of the workplace where fully vaccinated employees are exempt from the personal protective equipment (PPE), physical distancing, and physical barrier requirements of the OSHA ETS because there is no reasonable expectation that any person with suspected or confirmed COVID-19 will be present:

- Offices in OSS residences shared by the Household Director and QDDP.

### **Cleaning and Disinfecting**

LBSA follows MDH and CDC guidance for frequent cleaning and disinfecting of our program space, especially shared spaces. Specifically, we have implemented the following in our residential households:

- Established a sanitation schedule and checklist, identifying surfaces/equipment to be sanitized, the agent to be used, and the frequency at which sanitation occurs.
- Ensure high-touch surfaces such as doorknobs, light switches, stair rails, counters, tables and chairs, phones, keyboards, program equipment, games, remotes and other shared items are regularly cleaned and disinfected.
- Minimize the use of shared supplies (e.g. arts and crafts, office supplies) that cannot be sanitized and consider using designated bins for clean and used items.
- Use EPA-registered disinfectants recommended by the CDC: <https://www.epa.gov/coronavirus>. Laura Baker uses a one-step germicidal disinfectant cleaner. This has been provided to all

residences on the Oak Street campus, along with helpful tips for cleaning. For the most part, CS residences purchase their own supplies for cleaning and disinfecting.

- Oak Street residences are cleaned by housekeeping staff at least once daily. All common areas are wiped with disinfectant, and client rooms (if accessible) are also wiped down. If not accessible, staff or client with staff assistance take responsibility for cleaning in client rooms.
- All client clothing, bed linens and towels are washed individually so that a client's possessions are not co-mingled with that of another. When washing towels, bedding, and other items, staff and clients are directed to use the warmest appropriate water setting and dry items completely.
- In Community Services residences where more than one client uses the restroom, sinks could be an infection source, so clients are asked to avoid placing toothbrushes directly on counter surfaces. Totes or other appropriate containers are used for personal items so they do not touch the bathroom countertop. Oak Street clients have their own bathroom, so cross-contamination is not expected to be an issue.

With regard to LBSA Center and the commercial kitchen on the Oak Street campus, common and high touch areas are cleaned daily, and 8 disinfectant stations have been set up throughout LBSA Center. The disinfectant stations have one step germicidal disinfectant cleaner, paper towels and helpful tips for cleaning.

## Transportation

LBSA direct support staff working with any client are required to wear a surgical facemask for the duration of their shift; this requirement extends to any vehicle, whether private or LBSA-owned, when transporting a client.

LBSA limits the number of people in the vehicle (2 people/car and 3 people/van, including clients and staff) and asks that clients spread out to maintain social distancing as much as possible. To the extent feasible, there should be only one client/row.

When using air conditioning in the vehicle, staff are asked not to use recirculating air.

If clients are being transported to a day services program or work, staff should remind clients to wear a facemask or face covering, wash their hands, and follow social distancing guidelines while they are away.

If clients are being transported by day services staff or using public transportation, LBSA staff should confirm that drivers are wearing a mask. If this is not the case, staff should contact a supervisor so that this can be properly addressed with the agency providing transportation.

## Policies for Staff and Clients With Exposure to or Symptoms of COVID-19

Screening, testing, quarantine after an exposure, and isolation after a positive test will be conducted in accordance with CDC and MDH guidelines applicable to long-term care and congregate living settings, as applicable to OSS and CS residences respectively, including:

- Interim Infection Prevention and Control Recommendations to Prevent SARS-CoV-2 Spread in Nursing Homes  
<https://www.cdc.gov/coronavirus/2019-ncov/hcp/long-term-care.html>
- Recommended Protective Actions in Residential and Non-residential Settings Licensed by DHS  
<https://www.health.state.mn.us/diseases/coronavirus/enhancedrecs.pdf>

If a client's day program or employer requires a higher standard for quarantine following exposure or isolation following a positive test, LBSA will follow their requirements for that client.

LBSA monitors staff and clients for signs of illness. The list of potential symptoms is posted in each residence and is drawn from the CDC as updated:

- <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

The list of symptoms currently includes:

- Fever or Chills
- Cough
- Shortness of breath or difficulty breathing
- Sore throat
- Fatigue
- Muscle or body aches
- Headache
- New loss of smell or taste
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea

### **Staff**

In LBSA residences, staff must complete a daily assessment of symptoms at the commencement of their shift, including taking their temperature. This information is maintained in a log that is kept on the residence.

At LBSA Center, staff working in the center self-monitor daily. Self-screening will be performed by new hires entering the building and by any person expecting to be in the building for more than 10 minutes, including vendors, licensors, and other individuals attending meetings.

If staff exhibit one or more symptoms, they must immediately contact a supervisor and will be asked to leave work if ill. Staff will be asked to be tested for COVID-19 if warranted. Rapid antigen testing kits are available in the houses or from the Health office. Depending on the outcome of testing, staff may be required to be out of work per the guidelines established by CDC and MDH for either quarantine or isolation:

- Interim Infection Prevention and Control Recommendations for Healthcare Personnel During the Coronavirus Disease 2019 (COVID-19) Pandemic  
<https://www.cdc.gov/coronavirus/2019-ncov/hcp/infection-control-recommendations.html>

Staff providing direct care to a client who has tested positive should complete an assessment at the end of each shift to identify any breaches of PPE or other circumstances increasing the risk level of their contact with the client.

### **Clients**

Staff must assess clients for COVID-19 symptoms at least once per day and track these in a daily log.

If a client tests positive for COVID-19, shows symptoms, or has had exposure to someone who has tested positive, staff should move them away from other people, preferably to their own room. Contact with the client should be minimized as much as feasible.

- Place a mask over the person's mouth and nose if they tolerate it.
- Clients should quarantine or isolate in their own rooms to the extent they can tolerate and comply with this requirement.
- Staff should already be wearing a surgical mask (OSS and CS), gloves, and eye protection (OSS), but if having prolonged close contact with a client who has a confirmed or suspected COVID infection should wear full PPE. Initial supplies are available on each house.
- Contact the supervisor and nurse for further evaluation and directions. This may include contacting the client's healthcare provider for additional guidance regarding treatment.
- If someone presents with severe acute respiratory illness, they will require hospitalization. 911 may need to be called for symptoms like shortness of breath, difficulty breathing, and/or a bluish hue to the lips, in addition to the ones mentioned earlier. Notify the dispatch personnel if the individual has already tested positive for COVID-19, or let them know the person is being evaluated for COVID-19. If possible, put a facemask on the client before emergency medical services arrive.

### **Social Distancing**

Physical distancing will be implemented, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach.

LBSA is not a facility where staff provide care to non-residents or routinely conduct business on-site with members of the public. Therefore the main interactions are between staff members, contracted staff, vendors, visitors, and resident clients.

A small number of clients who are not OSS or CS residents attend music therapy sessions in Elwell House. These clients do not typically come into contact with residents of the houses or staff other than the Music Therapist and the LBSA Center Receptionist.

LBSA will ensure that each employee is separated from all other people in the workplace by at least 6 feet when indoors, unless such physical distance is not feasible for a specific activity. Where maintaining 6 feet of physical distance is not feasible, LBSA will ensure employees are as far apart from other people as possible.

At LBSA Center, the following protocols have been implemented to promote social distancing:

- Some staff are working remotely from home part-time or full-time in accordance with the Remote Work Policy.
- Common areas such as conference rooms, assembly rooms, lobby, and copier rooms have been assessed for maximum capacity and signs have been posted to limit numbers of people in these rooms at a given time.
- Tables and chairs have been rearranged to maximize space between people.
- Meetings are being held remotely when possible. When not possible, numbers will be limited to no more than 10 individuals in a meeting room accommodating the planned number of individuals. Individuals will wear masks during the meeting. They will disinfect the room and shared equipment upon completion of use.
- A clear barrier has been erected between the receptionist and lobby entrance where visitors wait.
- Signs are posted asking visitors to LBSA to maintain social distancing of at least 6 feet.
- Masks are to be utilized when staff are not alone in the personal workplace, including in hallways, copy and mail rooms, conference rooms, library, kitchen, and bathrooms.
- Deliveries are left in the front foyer.

## **Food Preparation and Meals**

Food preparation and meals have been adjusted in the households to promote social distancing. In the Oak Street residences, food is prepared in the Millis Hall kitchen and delivered by a staff of the dietary department to staff in the household. Household staff plate client meals individually so that multiple people are not using the same serving utensils.

Meals times are staggered such that there are no more than 2 clients at the table per setting. Clients wishing to eat meals in another area of the home, such as the living room or their room, may do so.

Staff assisting clients with eating, thus necessitating prolonged close contact, will wear necessary source control/PPE during mealtime, including a surgical mask and face shield.

Food, including condiments, and beverage may not be shared between clients.

In the CS residences, staff prepare meals and plate client meals individually. Clients may share a table at mealtimes but as much space as possible should be maintained between them.

Staff will eat at separate times from the clients.

## Ventilation

LBSA staff have evaluated its air conditioning and circulation systems and have worked to maximize the amount of fresh air being brought in, while limiting air recirculation. Furnace and AC systems in LBSA Center and in some of the houses are supplemented with air exchange. Using contracted maintenance services, LBSA ensures ventilation systems are properly used and maintained.

## Visitors

LBSA will follow current CDC and MDH guidance on visitation in the residences. Visitation is currently allowed for all residents without restrictions in accordance with MDH and CMS guidance.

- <https://www.cms.gov/files/document/qso-20-39-nh-revised.pdf>

All visitors are screened prior to entrance and are encouraged to wear a mask and to conduct hand hygiene when entering a residence. Alcohol based hand rub (ABHR) is situated close to the entry of each house for purposes of staff, clients and visitors conducting hand hygiene when entering the households.

## Notification and Risk Assessment

LBSA will report positive cases and any other test results required by MDH and will follow their directives. This includes conducting necessary contact tracing and exposure assessments for co-workers and clients with whom the staff or client has come into contact.

Individuals who have been exposed through close contact or working in the same well-defined portion of a workplace during the infectious period of a COVID-19 positive person will be informed of their exposure.

If a client is exposed or tests positive for COVID-19, proper notification will also be provided by Program Directors, Household Directors, or their designees to affected staff, clients, client representatives, day services or employers, and case managers. Supervisors should ensure that emergency contact information for staff and clients is kept up to date.

## Coordination with Other Employers

LBSA will communicate this COVID-19 plan with all other employers that share the same worksite and will coordinate with each employer to ensure that all workers are protected.

LBSA will adjust this COVID-19 plan to address any particular hazards presented by employees of other employers at the worksite.

LBSA has identified below all other employers to coordinate with to ensure employees are protected.

<b>Other Worksite Employers</b>		
<b>Employer Name / Representative</b>	<b>Role</b>	<b>Contact Information</b>
G&H Properties / Jay Grossman	Janitorial and maintenance	(612) 735-3799 <a href="mailto:fixit@laurabaker.org">fixit@laurabaker.org</a>

## Communication and Training About the Plan

LBSA has made this plan available to all staff on the LINK, and in each household. A copy of the plan is also posted on the LBSA Center kitchen bulletin board.

LBSA will post the plan to the Family Portal on its website and will make it available in hard copy format to any client, client representative or case manager who requests it.

LBSA will provide training on the plan to all staff, will ensure staff are capable of implementing it, and will update staff on any changes to the plan.

Staff with concerns about the COVID-19 Preparedness Plan or questions about their rights should contact MNOSHA Compliance at [osha.compliance@state.mn.us](mailto:osha.compliance@state.mn.us), 651-284-5050 or 877-470-6742.