



## Jewish Foundation for Group Homes

# Return to Safe Work and Risk Mitigation Plan (SWARM)

Table of Contents	
<a href="#">2</a>	<a href="#">Introduction</a>
<a href="#">2</a>	<a href="#">Definitions</a>
<a href="#">3</a>	<a href="#">Criteria for Re-Opening</a>
<a href="#">3</a>	<a href="#">Pre-Open</a>
<a href="#">4</a>	<a href="#">All Staff General</a>
<a href="#">4</a>	<a href="#">Rockville Office, MOST Locations General</a>
<a href="#">5</a>	<a href="#">In-Home Supports General</a>
<a href="#">5</a>	<a href="#">Group Home General</a>
<a href="#">7</a>	<a href="#">APPROXIMATE Timeline for JFGH Business Operations</a>
<a href="#">12</a>	<a href="#">Engineering Controls &amp; Physical Plant</a>
<a href="#">12</a>	<a href="#">Returning Employees to Work</a>
<a href="#">13</a>	<a href="#">Employee COVID-19 Pre-Shift Screening/Testing</a>
<a href="#">13</a>	<a href="#">Infection Prevention</a>
<a href="#">14</a>	<a href="#">Training</a>
<a href="#">14</a>	<a href="#">Confidentiality</a>
<a href="#">15</a>	<a href="#">IT Continuity and Technology</a>
<a href="#">15</a>	<a href="#">Plan Implementation/Communication</a>
<a href="#">15</a>	<a href="#">Strategic Reserves-Supplies approved for use by CDC/WHO/OSHA/DDA/DBHDS</a>
<a href="#">16</a>	<a href="#">Resources</a>

## Introduction

This Return to Safe Work and Risk Mitigation (SWARM) Plan outlines conditions for JFGH to re-engage our community and, in some cases, open programs and services that have been closed during the novel coronavirus COVID-19 pandemic and outlines processes that will be adopted as part of the organization’s restoration of its complete menu of supports. The SWARM is developed based on current guidelines and information from, but not only the following sources: The Centers for Disease Control and Prevention (CDC), the Centers for Medicare and Medicaid Services (CMS), the Maryland Department of Health/Developmental Disabilities Administration (DDA), the Virginia Department of Behavioral Health and Developmental Services (DBHDS), and Montgomery County, Maryland, as well as a range of sources of legal, medical and industry best and emerging practice resources. Footnotes are used to guide the reader to specific sources of information.

**NOTE:** *JFGH may, at any time without notice and in its sole discretion, further restrict and/or reverse any easing of restrictions across all or at any of its sites in response to events and/or circumstances within or outside of agency operations. Nothing herein is considered necessarily sequential, nor does this SWARM Plan, in whole or part, obligate JFGH to any cause or course of action. Decisions will be made, in any such circumstance, based on available agency and/or community data, input or direction from authorities whose jurisdiction reasonably includes JFGH and/or the services and supports it provides, and on the best judgement of JFGH Leadership.*

## Definitions

Congregate Setting	An environment where a number of people reside, meet or gather in close proximity for either a limited or extended period of time.
Contact Intensity	A function of contact type (ranging from close to distant) and duration (ranging from brief to prolonged). “Low” contact intensity is brief and fairly distant (beyond 6 feet), like walking past someone on the street. “High” contact intensity is prolonged, close contact, like sharing a bedroom.
Essential Employee (EE)	An employee that is employed by the Jewish Foundation for Group Homes, which is an essential business as defined by [Governor Hogan’s Executive Order number NO. 20-03-31-02 & Governor Ralph Northam’s Executive Order number NO. 53]. As such, the employee is deemed essential and required to report to work even when there is a state restriction.
Number of Contacts	The number of people in the setting at the same time. A higher number of contacts are presumed to be riskier.

### Criteria for Re-Opening

- Immediate access/rapid results (within hours) CDC recommended, FDA approved testing that aligns with *Maryland Strong: Roadmap to Recovery*<sup>1</sup>, High Risk stage for re-opening.
  - Unlimited access to diagnostic polymerase chain reaction (PCR) tests obtained by nasopharyngeal testing protocols or other FDA-approved diagnostic testing with rapid results (one hour or less).
  - If/when FDA approved vaccine for COVID-19/novel coronavirus becomes available, it shall be mandatory that JFGH personnel be vaccinated (this shall be treated the same way, as a matter of policy, as influenza vaccines).
- The number of daily COVID-19 positive cases and death rates flattens, per State of Maryland, Commonwealth of Virginia, and/or local county criteria, and is at a level that significantly reduces the risk to individuals supported and employees.
- Governor announcement that Maryland has reached the *High-Risk* stage of recovery, which includes lessened restrictions on visits to nursing homes and hospitals as outlined in the *Maryland Strong: Roadmap to Recovery* plan. It is possible that Commonwealth of Virginia re-opening protocols are different from those of Maryland. In all instances, JFGH will comply with and follow the more stringent of the two states' protocols.
- Availability of appropriate staffing of all community life programs that meets or exceeds regulatory mandates and preserves safe and healthy service delivery.

### Pre-Open

- Surveys of people receiving JFGH supports, families, DSPs and remaining staff to identify concerns and ideas.
- Create and stock strategic PPE reserve, to be used in case of emergency need and/or wave 2 of COVID-19.
- Assess people receiving JFGH supports for determination of health risk and vulnerability, as well as specialized support plans to minimize risk.
- Conduct a technology audit suitable to equipping JFGH with adequate soft- and hardware to support virtual services and support technologies.
- All JFGH staff may be tested for COVID-19, using nasopharyngeal or other FDA-approved testing, prior to return to work. Human resources (HR) will work with the appropriate department leader to determine timing and coordinate support of employees.
- Development department assessment of potential strategic collaborations/partnerships to access private foundation support, intellectual property and other resources.
- Property Operations department to:
  - Coordinate assessment of HVAC and related ventilation systems and other physical plant needs.
  - Assess office and program environments for needs of partitions, shields or other barriers; re-purposing of conference rooms, kitchen areas, lobbies and any other areas of the office and MOST buildings that have historically or could be used for congregating.
    - JFGH may limit occupancy of break rooms and/or conference rooms.
    - Any food for breakfast, lunch and/or snacks should be brought by employees in sealed containers.
  - Perform ergonomic and environmental evaluations to be performed prior to re-opening to determine set-ups to assure appropriate distances between workspaces.

<sup>1</sup> Avail at [https://governor.maryland.gov/wp-content/uploads/2020/04/MD\\_Strong.pdf](https://governor.maryland.gov/wp-content/uploads/2020/04/MD_Strong.pdf). Retrieved 5/10/2020

- Signage regarding physical distancing, handwashing protocols and masking requirements will be prominently displayed in all JFGH sites/locations, including in common areas, rest rooms and offices.

### All Staff General

- If/when a vaccination for COVID-19/novel coronavirus becomes available, it shall be mandatory that JFGH personnel be vaccinated.<sup>2</sup>
- The Families First Coronavirus response Act (FFCRA) sick and related leave protocols will remain in place post-re-open.
- Should JFGH determine, in its sole discretion, to return a staff person to work after that employee has either tested positive for COVID-19 and who cannot be re-tested, or has reported or demonstrated COVID-19 symptoms, the employee shall:
  - Have been fever-free, without fever-reducing medication (e.g., aspirin, Tylenol), for at least three (3) days; and,
  - Have been without or seen marked improvement in any respiratory symptoms (e.g., coughing, shortness of breath or difficulty breathing); and,
  - Ten (10) full days have elapsed since the employee's first onset of symptoms.
- A series of questions/probes about symptoms and activities must be answered by DSPs and/or any other JFGH staff member providing direct supports on signing into any shift(s).
- If any JFGH staff member is sick, they should stay home and not report to work.
- Any JFGH staff who, on their personal time, travels outside of the District of Columbia/Maryland/Northern Virginia (DMV) area to other areas of the US and/or internationally, must quarantine at home for a period of 14 days per the executive order and must be cleared prior to return to work.
- Personal Protective Equipment (PPE) will be maintained at all JFGH office and service locations, which will be made available to staff.
- Incoming mail, including any packages, at any JFGH location shall be wiped down/cleaned using Lysol/Clorox wipes or similar, or cleaned with appropriate disinfectant and disposable rags.
- Miscellaneous:
  - JFGH shall communicate these and related protocols with any/all third-party vendors with which it contracts or partners in any way. Office and program site delivery specifications will be shared with vendors, volunteers and contractors, and shall apply to them without exception at any time they are on JFGH premises.
  - All information that includes personally identifying details pertaining to COVID-19 infections among people supported by JFGH and our DSPs is confidential and protected as private by the Health Insurance Portability and Accountability Act (HIPAA), without exception.

### Rockville Office, MOST Locations General

- All visitors shall complete an appropriate health assessment form and assessment before being granted entry to the Rockville Office lobby or Virginia-based MOST sites. JFGH reserves the right to deny access to any of its operating sites.

<sup>2</sup> Exemptions may be granted in the sole discretion of JFGH. Please see procedures for requesting an exemption in JFGH *Infectious Disease* policy and procedures.

- For deliveries of supplies, mail, parcels or packages and any other delivery, contactless delivery shall be used whenever possible.

### In-Home Supports General

- CL/IHS supports shall be provided, to the greatest extent possible, to minimize the number of DSPs supporting individual people receiving supports.
  - The regular and ongoing use of virtual supports (i.e., not in-person, but rather on a tele-platform) may be permissible and shall be offered to all people receiving CL/IHS supports.
- CL/IHS supports shall not be provided in community gathering places (e.g., libraries, community centers) in which physical distancing cannot be observed until such time as restrictions on social/public gatherings are eased.
- For people receiving CL/IHS supports who live with others, the following guidelines apply and are to be encouraged by CL/IHS staff:
  - Shared spaces (kitchen, bathrooms, living and other common areas) are to be cleaned/disinfected per Centers for Disease Control and Prevention (CDC) guidelines using Environmental Protection Agency (EPA)-approved cleaners. CDC Guidelines: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cleaning-disinfection.html>. EPA-approved disinfectants: <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>.
  - Physical distancing guidelines—including, for example, one person in a shared space at a time; no shared meals or mealtime.
  - Any illness or symptoms of COVID-19 shall be reported to CL/IHS support staff immediately.
- JFGH staff, including CL/IHS leadership, shall be aware of and monitor for in-person contacts among people receiving CL/IHS supports with family members, healthcare and related health professionals (e.g., behavioral health providers, allied health providers), and friends and extended networks of support in order to, as may become necessary, conduct contact tracing.

### Group Home General

- Group homes (GH)-based supports are considered high contact intensity, low number of contacts. Because GHs are a congregate setting, they are considered high-risk for outbreak(s).
  - GH testing protocols shall include pre-shift testing—staff may not report for work in any GH unless they have been tested for COVID-19 using an appropriate nasopharyngeal testing protocol.
  - At the start of any shift, DSPs shall answer a series of questions/probes about symptoms and activities that must be entered in the MITC time-keeping system in order to start working.<sup>3</sup>
  - Body temperature will be measured and recorded. A temperature of 100.4 and above will result in a second measurement being taken. Should the DSP measure a temperature of 100.4 or above a second time, they will be sent home and not be permitted to begin their shift/stint.
- To the fullest extent possible, physical distancing is to be practiced. Recognizing that many people receiving GH supports need staff assistance that makes physical distancing impossible, the following protocols are in effect during re-opening:
  - Goggles or safety glasses shall be worn by DSPs whenever working with anyone who has tested positive for COVID-19 and shall be changed or cleaned properly before working with another person.

<sup>3</sup> See symptoms list at <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

- Gowns or coveralls shall be worn by DSPs whenever working with anyone who has tested positive for COVID-19. Gowns/coveralls shall be changed after use, using appropriate doffing (removal) guidelines, with each person who has tested positive for COVID-19.
- Gloves shall be worn by DSPs whenever working with anyone who has tested positive for COVID-19. Gloves shall be changed after use, using appropriate doffing guidelines, with each person who has tested positive for COVID-19.
- Face shields shall be worn by DSPs whenever working with anyone who has tested positive for COVID-19. Face shields shall be changed after use, using appropriate doffing guidelines, with each person who has tested positive for COVID-19. Face shields shall be cleaned properly before they are re-used.
- N95/KN95 masks shall be worn by DSPs whenever working with anyone who has tested positive for COVID-19. Masks shall be changed after use, using appropriate doffing guidelines, with each person who has tested positive for COVID-19.
- Any gowns, coveralls, gloves and masks of any kind used while supporting a person who has tested positive for COVID-19 shall be considered hazardous medical waste, which shall be disposed of in appropriate receptacles and collected by a third-party, contracted vendor for this purpose.
- Proper hand hygiene, using soap and water, for 20 seconds or more, shall be performed before any contact with anyone receiving supports. Hand sanitizer shall be available at each JFGH program and office site; however, hand sanitizer is not considered a substitute for proper handwashing.
- No DSP or any member of JFGH staff shall enter a GH who is not explicitly assigned to work at/for that specific GH.
- GHs shall be thoroughly cleaned, using CDC cleaning and disinfecting guidelines and EPA-approved disinfectants daily.<sup>4</sup>
- Should anyone receiving GH supports display symptoms of COVID-19, they are to be isolated immediately from anyone else living in the GH. In any case in which the person showing symptoms shares a room with another person living in the home, that other person is to be relocated to an alternative location immediately.
  - A JFGH nurse and the Program Manager is to be notified immediately. The nurse shall direct next medical/clinical steps.
- There will be no group activities (e.g., dining, trips in a single vehicle) that cannot be done using physical distancing until there is a COVID-19 vaccination and all people living in the GH have been vaccinated.
  - Meals may be staggered and/or enjoyed in separate areas of the GH.
- Household supplies, foodstuffs, medications and related medical equipment, durable and disposable supplies and any other needs of the GH will be delivered to each home until, at the earliest, Maryland Governor Hogan announces implementation of High-Risk stage of the State re-opening.
  - Deliveries shall be made to the front porches or doors only (i.e., there shall be no entry permitted to the GH by anyone other than DSPs assigned to shifts/stints at the GH), which shall be communicated to DSPs working in the home.
- Clothing, towels, bed linens and any other items that are laundered are to be washed on the hottest setting available on the washing machine.
- Bedrooms shared by two (2) people receiving supports are to be configured to assure beds are at least six feet (6') apart. Beds shall be arranged to assure that individuals are laying toe-to-toe

<sup>4</sup> <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cleaning-disinfection.html>. EPA-approved disinfectants: <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>.

whenever possible; however, in no instance shall beds be used in any way that has people laying head-to-head.

### APPROXIMATE Timeline for JFGH Business Operations

#### Phase 1

Timing of phases is dependent upon most stringent reduction of “stay at home” and community opening guidelines as outlined in *Maryland Strong: Roadmap to Recovery* as implemented in Montgomery County.

#### Rockville Office, Maryland and Virginia MOST

Staggered openings

Teams by function assigned to each stage of re-opening

##### *Rockville Office/MOST*

- Normal office-based operations re-commence when Montgomery County lifts Stay at Home order and announces Stage 1 (“Low Risk”) of MD Gov. Hogan’s *Maryland Strong: Roadmap to Recovery*.
- Regular business hours. Leadership may ‘stagger’ office-based employees so as to promote disaggregation.
- No visitors. Deliveries/vendors allowed for drop deliveries.
- Maintain MOST programming to 1 hour minimum per weekday of 100% virtual supports for individuals.
- Scheduling: Telework during virtual programming times only for assigned DSPs.
- No visitors. Deliveries/vendors allowed for drop deliveries.
- Meetings: Virtual/telecommunications. No off-site, in-person JFGH related meetings should occur until Phase 3 of this SWARM plan or as otherwise announced.
- Common areas: Reconfigured to promote physical distancing and/or limited as to number of occupants at a time.
- Masking mandatory.
- Common areas: Reconfigured to promote physical distancing and/or limited as to number of occupants at a time.

*Virginia MOST* (Will open only after the Commonwealth of Virginia’s Forward Virginia: A Blueprint for Easing Public Health Restrictions<sup>5</sup> allow.)

- Maintain MOST programming to 1 hour minimum per weekday of 100% virtual supports for individuals.
- Scheduling: Telework during virtual programming times only for assigned DSPs.
- No visitors. Deliveries/vendors allowed for drop deliveries.
- Meetings: Virtual/telecommunications. No off-site, in-person JFGH related meetings should occur until Phase 3 of this SWARM plan or as otherwise announced.
- Exceptions: Administrative employees may have permission from the CEO or designee to work from the administrative offices.
- Virtual supports.
- Masking mandatory.

<sup>5</sup> Avail at <https://www.virginia.gov/coronavirus/forwardvirginia/>. Retrieved 5/20/2020

- Common areas: Reconfigured to promote physical distancing and/or limited as to number of occupants at a time.

**Community Living Services (CLS)—In-Home Supports (IHS).** Maintain CLS-IHS at reduced staffing support hours, face to face time, and assignment of multiple staff to multiple locations.

- Supports Scheduling: In-person and virtually as assigned based on needs of Individuals supported and state safety guidelines.
- Staff Scheduling: Work from home/telework.
- Meetings: Virtual/telecommunications. No off-site, in-person JFGH related meetings should occur until Phase 3 of this SWARM plan or as otherwise announced.
- Exceptions: Administrative employees may have permission from the CEO or designee to work from the administrative offices.

**NOTE**

For any/all people receiving IHS supports who are employed, return to work shall be guided by individuals' respective employers. However, JFGH shall offer support to each person in order for them to:

- ✓ Assess for conditions at the workplace.
- ✓ Determine need for masks, gloves and related PPE that the person may need to feel safe.
- ✓ Assess for transit options to go to/from work, including a determination of the risks of public transportation options.

**Community Living Services (CLS)—Group Homes (GH).** Maintain CLS-GH on the 24/7 “stay at home” live-in model.

- Scheduling: Work at assigned sites on the 14 day/14-16 hour live-in shifts model. DSPs and LDSPs assigned to shifts must stay for a minimum of 14 days without leaving the premises.
- Unassigned staff Scheduling: Work from home/telework/community errands.
- Meetings: Virtual/telecommunications. No off-site, in-person JFGH related meetings should occur until Phase 3 of this SWARM plan or as otherwise announced.
- Exceptions: Administrative employees may have permission from the CEO or designee to be in the administrative offices.
- No home visits.
- Restricted family visits.

**NOTE**

For any/all people receiving GH supports who are employed, return to work shall be guided by individuals' respective employers. However, JFGH shall offer support to each person in order for them to:

- ✓ Assess for conditions at the workplace.
- ✓ Determine need for masks, gloves and related PPE that the person may need to feel safe.
- ✓ Assess for transit options to go to/from work, including a determination of the risks of public transportation options.

## Phase 2

Begin Phase 2 not sooner than three (3) weeks after phase 1 and downward trending from Maryland “Low Risk” recovery stage onset in Montgomery County.

### *Rockville Office (Maryland MOST)*

- Regular business/MOST hours.
- Maintain MOST programming to 2 hours minimum per weekday of 100% virtual supports for individuals.
- Virtual supports.
- No visitors.
- Meetings: Virtual/telecommunications. No off-site, in-person JFGH related meetings should occur until Phase 3 of this SWARM plan or as otherwise announced.
- No visitors. Deliveries/vendors allowed for drop deliveries.
- Common areas: Reconfigured to promote physical distancing and/or limited as to number of occupants at a time.
- Masking mandatory.

### *Fairfax & Loudoun MOST*

- No more than 50% on-site occupancy/participation of people supported (Offices will open at this level only after the Commonwealth of Virginia’s Forward Virginia: A Blueprint for Easing Public Health Restrictions<sup>6</sup> allow.)
- Regular business/MOST hours.
- Maintain MOST programming to 2 hours minimum per weekday of 100% virtual supports for individuals.
- In-person supports of no more than three (3) total people and for no longer than an hour per day per group permitted with use of appropriate PPE, to minimally include 3ply or better masking for ALL and following strict physical distancing guidelines.
  - Groups of three (3) can be staggered through the day. Groups cannot overlap.
- Meetings: Virtual/telecommunications. No off-site, in-person JFGH related meetings should occur until Phase 3 of this SWARM plan or as otherwise announced.
- No visitors. Deliveries/vendors allowed for drop deliveries.
- Common areas: Reconfigured to promote physical distancing and/or limited as to number of occupants at a time.
- Masking mandatory.

**Community Living Services (CLS)—In-Home Supports (IHS).** Maintain reductions in staffing support hours, face to face time, and assignment of multiple staff to multiple locations.

- Scheduling: As assigned based on needs of Individual supported and state safety guidelines.

**Community Living Services (CLS)—Group Homes (GH).** Maintain CLS—GH on the 24/7 “stay at home” live-in model.

- Scheduling: Work at assigned sites on 7-14 day/12-16 hour live-in shifts. DSPs and LDSPs assigned to shifts must stay for at a minimum of 7 days without leaving the premises.
- Home visits permitted; however, return to the GH cannot occur prior to 14 days from the day the person left; and,

<sup>6</sup> Avail at <https://www.virginia.gov/coronavirus/forwardvirginia/>. Retrieved 5/20/2020

<ul style="list-style-type: none"> <li>○ A health status assessment will be completed prior to entry to the home, to include but not necessarily limited to a temperature reading.</li> <li>○ JFGH reserves the right, for any reason, to require testing to determine suitability of the person’s return to the home.</li> <li>● Restricted family visits.</li> </ul>
<p><b>Phase 3</b> Begin Phase 3 not sooner than four (4) weeks <u>after</u> phase 2 and downward trending from Maryland “Medium Risk” recovery stage onset in Montgomery County.</p>
<p><b>Rockville Office.</b> Maintain administrative personnel at not more than 75% occupancy</p> <ul style="list-style-type: none"> <li>● Scheduling: Alternate the use of telework and in-office work. Whenever possible, supervisors should develop schedules that alternate by week.</li> <li>● Meetings: Virtual/telecommunications.</li> <li>● Masking mandatory.</li> <li>● Visitors: No more than two (2) visitors at any point in time; no more than four (4) visitors total on any business day. Deliveries/vendors allowed for drop deliveries.</li> </ul> <p><i>Rockville Office/Maryland MOST</i></p> <ul style="list-style-type: none"> <li>● In-person supports of no more than three (3) total people and for no longer than one (1) hour per day per group permitted with use of appropriate PPE, to minimally include 3ply or better masking for ALL and following strict physical distancing guidelines.</li> <li>● Maintain MOST programming to three (3) hours minimum per weekday (minimum hours based on licensing/waiver requirements) of 100% virtual programming for Individuals supported.</li> <li>● Groups of three (3) can be staggered through the day. Groups cannot overlap.</li> <li>● Meetings: Virtual/Telecommunications</li> <li>● Virtual supports.</li> <li>● No visitors.</li> <li>● Common areas: Reconfigured to promote physical distancing and/or limited as to number of occupants at a time.</li> <li>● Masking mandatory.</li> </ul> <p><i>Fairfax &amp; Loudoun MOST</i></p> <ul style="list-style-type: none"> <li>● No more than 75% on-site occupancy/participation of people supported.</li> <li>● Maintain MOST programming to three (3) hours minimum per weekday (minimum hours based on licensing/waiver requirements) of 100% virtual programming for Individuals supported.</li> <li>● In-person supports of no more than five (5) total people and for no longer than two (2) hours per day per group permitted with use of appropriate PPE, to minimally include cloth or better masking for ALL (mandatory).             <ul style="list-style-type: none"> <li>○ Groups of five (5) can be staggered through the day. Groups cannot overlap.</li> </ul> </li> <li>● Meetings: Virtual/telecommunications.</li> <li>● No visitors.</li> <li>● Common areas: Reconfigured to promote physical distancing and/or limited as to number of occupants at a time.</li> </ul> <p><b>Community Living Services (CLS)—In-Home Supports (IHS).</b> Maintain reductions in staffing support hours, face to face time, and assignment of multiple staff to multiple locations.</p>

- Scheduling: Virtual and In-person as assigned based on needs of Individual supported and state and/or county safety guidelines.
- Meetings: Virtual/telecommunications.

**Community Living Services (CLS)—Group Homes (GH).** Maintain Community Life Group Homes on the 24/7 “Stay at home” live in model or extended shift model.

- Scheduling: Work at assigned sites on 7-14 day/12-16 hour live-in shifts or other modified extended shift but non-live in model. Gradual move from live-in based on ability to staff and individuals returning to work as essential employees or day programming.
- Meetings: Virtual/telecommunications.
- Home visits permitted; however, return to the GH cannot occur prior to 14 days from the day the person left; and,
  - A health status assessment will be completed prior to entry to the home, to include but not necessarily limited to a temperature reading.
  - JFGH reserves the right, for any reason, to require testing to determine suitability of the person’s return to the home.
- Restricted family visits.

**Phase 4**

Begin Phase 4 not sooner than four (4) weeks after phase 3 and downward trending from Maryland “High Risk” recovery stage onset in Montgomery County.

**Rockville Office.** 100% occupancy

- Scheduling: Alternate the use of telework and in-office work. Whenever possible, supervisors should develop schedules that alternate by week.
- Meetings: Virtual/telecommunications.
- Masking mandatory.
- Visitors: No more than two (2) visitors at any point in time; no more than four (4) visitors total on any business day. Deliveries/vendors allowed for drop deliveries.

*Rockville Office (Maryland MOST)*

- Regular MOST hours. Maintain MOST programming to four (4) hours minimum per weekday of a combination of virtual and community-based supports for individuals.
- In-person supports of no more than seven (7) total people in the Rockville site and for no longer than one (1) hour per day per group permitted with use of appropriate PPE, to minimally include 3ply or better masking for ALL and following strict physical distancing guidelines.
  - Groups of seven (7) can be staggered through the day. Groups cannot overlap.
- Meetings: Virtual/telecommunications.
- No visitors.
- Common areas: Reconfigured to promote physical distancing and/or limited as to number of occupants at a time.
- Masking mandatory.

*Fairfax and Loudoun MOST*

- Maintain MOST programming to 4 hours minimum per weekday (minimum hours based on licensing/waiver requirements) of a combination of virtual and community-based programming for Individuals supported
- Up to 100% occupancy.
- Scheduling: In-office with options to alternate the use of virtual and in-office work
- Meetings: Virtual/telecommunications and In-person.
- Masking mandatory.

**Community Living Services (CLS)—In-Home Supports (IHS).** Maintain reductions in staffing support hours, face to face time, and assignment of multiple staff to multiple locations.

- Scheduling: Telework, in person and virtual based on needs of Individual supported.
- Meetings: Virtual/telecommunications and In-person.
- Masking mandatory.

**Community Living Services (CLS)—Group Homes (GH).** Staffing is a combination of shortened live-in stints and state approved staffing to individual ratios, per choice of persons supported and needs of home in accordance to risk assessments.

- Scheduling: Work at assigned sites on 7-14 day/12-16-hour live-in shifts or another modified extended shift but non-live in model. Gradual move from live-in based on ability to staff and Individuals returning to work as essential employees or day programming.
- Meetings: Virtual/telecommunications.
- Home visits permitted.
  - A health status assessment will be completed prior to entry to the home, to include but not necessarily limited to a temperature reading.
  - JFGH reserves the right, for any reason, to require testing to determine suitability of the person's return to the home.
- Restricted family visits.

**Engineering Controls & Physical Plant**

- Ergonomic and environmental evaluations of all four (4) JFGH administrative buildings to be performed prior to re-opening

**Returning Employees to Work**

- Create, collect and review employee survey regarding people returning to work.
- Plan for employees who fall within the CDC Extended Flexibilities Categories
- Employee Refusal to Work Contingency planning
- Flexible sick and leave without pay (LWOP) policies.
- Train/educate employees on return to work protocols.
- Communicate timeline on how and when
  - Phase-structured timeline based on essential business tasks
  - Potential changes in assignment location and time
  - Alternating attendance
- Employee mental health considerations:
  - Employee assistance program (EAP)

- Community Connections
- Resources for self-care practices:
  - Meditation
  - Nutrition
  - Exercise

### Employee COVID-19 Pre-Shift Screening/Testing

The following structure is intended to minimize operational disruption while preserving and protecting against subsequent exposure risks.

- Essential employees may be required to have COVID-19 testing<sup>7</sup> with negative results prior to shift.
  - This shall be provided by JFGH at its cost, unless otherwise covered by a government program available to either the agency or individual employee(s) thereof.
  - Staff are to self-quarantine while awaiting results
  - If negative, EE may work as expected.
  - If positive:
    - EE is placed in quarantine (14 days from the specimen collection), during which time the EE shall be paid their base hourly wage at the FTE level for their position. Emergency Paid Sick Leave (EPSL) and JFGH Sick, Personal, Vacation and /or unpaid leave may be available as well.
    - Negative test result required prior to return to work
    - Testing results shall be kept strictly confidential; and, documentation shall be kept in the employees' medical records.
  - Should JFGH determine, in its sole discretion, to return a staff person to work after that employee has either tested positive for COVID-19 and who cannot be re-tested, or has reported or demonstrated COVID-19 symptoms, the employee shall:
    - Have been fever-free, without fever-reducing medication, for at least three (3) days; and,
    - Cessation of any respiratory symptoms (e.g., coughing, shortness of breath) for at least three (3) days; and,
    - Ten (10) full days have elapsed since the employee's first onset of symptoms.
- A series of questions about symptoms and activities that must be answered by DSPs on signing into a shift will apply to all JFGH employees, including salaried/exempt personnel.
  - Employee is required to report temperature before shift.
- FFCRA sick and related leave protocols will remain in place post-re-open.
  - If an EE calls in sick, they may be required to be medically cleared by a healthcare professional before returning to work.
- Traveling outside of the DMV shall be disclosed, and JFGH may, in its sole discretion, direct the employee to non-direct support or alternative work functions.

### Infection Prevention

- Signage regarding physical distancing, handwashing protocols, respiratory etiquette and masking requirements will be prominently displayed in all JFGH sites/locations rest rooms and offices.

<sup>7</sup> Exemptions may be granted in the sole discretion of JFGH. Please see procedures for requesting an exemption in JFGH *Infectious Disease* policy and procedures.

- Masking is required in all work environments at all times when in the presence of any others. JFGH will provide 3ply surgical masks; however, an employee may wear a cloth mask of their own choosing so long as it meets minimum CDC standards.
- Personal Protective Equipment (PPE) will be maintained at all JFGH office and licensed service locations, which will be made available to staff.
- Physical distancing will be required in all circumstances, unless the supports needed by anyone to whom JFGH provides service must be provided in closer proximity than Physical distancing allows.
- Handwashing
  - Basic infection prevention measures are being implemented at our workplaces at all times. All employees are instructed to wash their hands for at least 20 seconds with soap and water or use hand sanitizer, per directions on the label, with at least 60% alcohol if soap and water are not available. Handwashing must occur whenever hands are dirty or potentially contaminated.
  - All visitors to the workplace will be required to wash or sanitize their hands prior to or immediately upon entering the JFGH premises. Hand-sanitizer dispensers (that use sanitizers of greater than 60% alcohol) are at entrances and locations in the workplace so they can be used for hand hygiene in place of soap and water, as long as hands are not visibly soiled.
- Respiratory etiquette:
  - Employees, Individuals supported, and visitors should be instructed to:
    - Cover their mouth and nose with their sleeve or a tissue when coughing or sneezing.
    - Avoid touching face, in particular mouth, nose and eyes, with hands.
    - Dispose of tissues in trash receptacles.
    - Wash or sanitize hands immediately after any of the above.
- Health checks:
  - Daily temperature check and other screening protocols
  - Periodic COVID-19 testing, if available, for all employees who have direct contact with Individuals supported or are actively in the community
- Cleaning and Disinfecting
  - Routine cleaning and disinfection of frequently touched objects and surfaces such as workstations, keyboards, telephones, handrails, tables, light switches and doorknobs.
  - Avoid using other employees' phones, desks, offices, or other work tools and equipment, when possible. Clean and disinfect them before and after use.
  - Routine cleaning of homes and office spaces.
- Alternate locations for cohorting, quarantine or isolation
  - Increase capacity in home that is under isolation for a person in another site that is also isolating.
  - Vacant JFGH properties
  - Hotels
  - Other Recovery Centers

### Training

- JFGH training protocols have been modified to include virtual and on-line platforms only, which shall not change until BOTH Maryland's Governor Hogan announces the State's implementation of the High Risk stage of recovery AND the Maryland Developmental Disabilities Administration withdraws its Medicaid waiver Appendix K or it expires, whichever is the latter.

### Confidentiality

- All personal health information pertaining to COVID-19 infections among people supported by JFGH and our DSPs is confidential and protected as private by the Health Insurance Portability and Accountability Act (HIPAA), without exception. No personally identifying private information is to be shared by any JFGH staff, volunteer or anyone associated with the organization in any way and in any circumstance. This prohibition is absolute and covers any means of communication, including written, spoken or signed, by e-mail, physical media or on any other communication platform

### IT Continuity and Technology

- Assessment of IT capacity to continue optimal telework conditions even after re-opening/restoration efforts.
  - Bandwidth
  - Laptops and tablets
  - Remote Desktop
  - Vulnerabilities of WFH/Remote connectivity and security concerns with respect to confidential information, including software and equipment that employee will use to perform work-related tasks.
  - Saving documents
  - Security of ZOOM, Teams, and other meeting apps

### Plan Implementation/Communication

- Leadership and employees are responsible for implementing and complying with all aspects of this Return to Safe Work and Risk Mitigation Plan and any other JFGH COVID-19 Preparedness Plans.
  - Any/all communication about JFGH and our experience of the COVID-19 pandemic is to be coordinated and authorized by the CEO and/or his designee (may include the Communications Manager, Chief Development Officer and/or Board President). No other external communication is authorized.
- Additional communication and training will be ongoing and provided to JFGH personnel.

### Strategic Reserves-Supplies approved for use by CDC/WHO/OSHA/DDA/DBHDS

- JFGH will maintain a supply of any or all of the followings items based on availability, obtainability and financial resources
  - PPE: Disposable surgical gowns, disposable Tyvek suits, disposable surgical/3ply face masks, disposable N95 and/or KN 95 masks, disposable gloves, cloth washable face covering, etc.
  - Cleaning products: Disinfectant cleaning wipes, bleach, disinfectant sprays, antiviral and/or antimicrobial hand soaps, hand sanitizers with at least 60% alcohol content and/or any other antiviral/antimicrobial disinfectant.
  - Paper products
  - Thermometers – No touch forehead for general use or ear/oral thermometers with covers for single person use only.
  - Adult briefs/incontinence products and wipes – obtaining these items are the responsibility of Individual who requires such. The individual, JFGH staff and/or family member will be

responsible for requesting and purchasing through insurance, pharmacy or retail/wholesale sources (Individual is responsible for the cost associated with these products).

### Resources

**Centers for Disease Control (CDC):** Coronavirus (COVID-19) – [www.cdc.gov/coronavirus/2019-nCoV](http://www.cdc.gov/coronavirus/2019-nCoV)

Centers for Medicare and Medicaid Services: <https://www.cms.gov/medicareprovider-enrollment-and-certificationsurveycertificationgeninfopolicy-and-memos-states-and/guidance-infection-control-and-prevention-coronavirus-disease-2019-covid-19-intermediate-care>

Maryland Developmental Disabilities Admin.: [https://dda.health.maryland.gov/Pages/DDA\\_COVID-19\\_Information.aspx](https://dda.health.maryland.gov/Pages/DDA_COVID-19_Information.aspx)

Maryland Strong: Roadmap to Recovery: [https://governor.maryland.gov/wp-content/uploads/2020/04/MD\\_Strong.pdf](https://governor.maryland.gov/wp-content/uploads/2020/04/MD_Strong.pdf)

New York City Health Guidelines for Congregate Settings:  
<https://www1.nyc.gov/assets/doh/downloads/pdf/imm/guidance-for-congregate-settings-covid19.pdf>

**Office of Safety and Health Administration (OSHA):** [www.osha.gov](http://www.osha.gov)

Virginia Department of Behavioral Health and Developmental Services:  
<http://www.dbhds.virginia.gov/covid19/providerfaq>