

## Jewish Foundation for Group Homes (JFGH) Business Resumption Plan

This COVID-19 Business Resumption Plan (BRP) outlines conditions for JFGH’s resumption of full program and business operations, and the organization’s restoration of its complete menu of supports. The BRP is developed based on current guidelines and information from 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.

**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 BRP 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.*

### Conditions for Restoration of Business Operations

- JFGH’s *Infectious Disease* Policy and Procedures remains in place and governs these and related protocols.
- People supported by JFGH and all of its employees shall be verifiably vaccinated and boosted against COVID-19, per CDC guidelines.
- Personal protective equipment (PPE) supplies will be stocked in suitable amounts at each site at which JFGH conducts its business and program operations.
- JFGH preserves the right to implement a COVID-19 testing protocol for its employees and people to whom it delivers support.
- Community vaccination, testing positivity, and community transmission rates will be used to determine continued easing of restrictions, which shall occur at the sole discretion of JFGH.
- Alterations of any such pandemic-related staffing patterns will occur when JFGH determines conditions warrant. Factors that will inform any alteration of pandemic operations will include but not be limited to:
  - Availability of fully vaccinated and boosted employees.
  - The number and support needs of people supported.
  - Access to day/employment supports by people JFGH supports.
  - Health risks, including any people supported who are immunocompromised.
- Continued implementation and use of health screening questionnaires and attestations.
- Consent to and cooperation with symptom screening protocols, including temperature-taking.
- Groups of 10 or more are to be avoided until such time as community full vaccination **and** booster rates exceed 70%.
  - JFGH will also closely monitor the CDC’s Community Transmission rates and may, in its full discretion, further limit group activities should transmission risks be rated as *substantial* or *high* (as rated here: <https://covid.cdc.gov/covid-data-tracker/#county-view>).

- All visitors, staff and/or people supported by JFGH may be required to complete an appropriate health assessment before being granted entry to any JFGH location. JFGH reserves the right to deny access to any of its operating sites.
- Masking may be required in any/all work environments. JFGH will continue to provide 3ply surgical and KN95 masks; however, an employee may wear a cloth mask of their own choosing so long as it meets minimum CDC standards.
  - Current CDC masking guidelines for fully vaccinated people, in the following circumstances:
    - If the area/region (for JFGH, Montgomery County, MD, and Fairfax and Loudoun Counties, VA) is rated as a *substantial* or *high* transmission area.
    - If the person is immunocompromised or at increased risk for severe disease from COVID-19, or if the person has someone in their household who is immunocompromised, at increased risk of severe disease or is not fully vaccinated.
  - JFGH may modify masking requirements for employees and/or people supported without notice.

#### All JFGH Employees

- As a condition of employment and consistent with the *Infectious Disease* Policy and Procedures, all JFGH employees must receive certain vaccinations, including but not limited to an annual influenza vaccination and COVID-19 vaccination and booster, or possess an approved exception. The Human Resources department shall coordinate with employees to meet and document compliance with this requirement.
- In limited circumstances, employees may request exemption, the process for which will be governed by the Infectious Disease policy and procedures.
- Employees shall provide, when requested, evidence of vaccination and booster, per CDC guidelines, which must indicate the COVID-19 vaccine and booster was, in fact, received.
- Pre-Shift Screening/Testing/Attestation
  - JFGH employees may be required to be tested for COVID-19 prior to any shift or direct support. Any positive test result may:
    - Result in a requirement for a follow-up test.
    - Result in the employee quarantining for a period to be determined by JFGH and/or the employee's healthcare provider.
    - The need for a negative test(s) result in order to return to work.
    - A series of questions/probes about symptoms and activities must be answered by all employees on signing into any shift(s). Standards/requirements around confidentiality and HIPAA apply.
  - Employees are required to self-report any COVID-19 or flu-like symptoms, and in any such circumstance should NOT report to work. This requirement applies to employees without regard to vaccination status.
  - Employees and/or people receiving supports (in MOST, for example) who are sick should stay home and not report to work or the program site.
- Employees, irrespective of their vaccination status, may be sent home by their supervisor should there be any reason to believe the employee is ill or has been exposed to someone who has tested positive or was potentially exposed to COVID-19.

- May not report back to work unless they have been tested negative for COVID-19 (there may be circumstances in which two negative test results is required for return to work, which shall be defined by JFGH in its sole discretion and communicated to the employee) using an appropriate diagnostic testing protocol and potentially quarantining for an appropriate period after exposure.
- HR may be consulted when determining any course of action; and, a member of the HR team will follow-up with staff who are not working due to illness.
- In limited circumstances, which shall be determined by JFGH Leadership, an employee who is unable to work secondary to the application of agency policy, and/or these or related protocols may be paid all or part of their expected wages, or may be required to use their accrued Paid Time Off, or may request Emergency PTO in accordance with JFGH policy and procedures, or may be unpaid during their time away from work.
- Employees traveling outside the United States for any reason may be required to undergo testing and/or self-quarantine prior to returning to work at the sole discretion of JFGH, which shall, in any event, be based on CDC Risk Assessment levels (available at <https://www.cdc.gov/coronavirus/2019-ncov/travelers/map-and-travel-notice.html>), current guidelines and/or best practices. In any such circumstance, the employees shall be cleared by the Human Resources Department prior to return to work. Employee may work if remote work is available.
  - Employees traveling within the United States may require a similar set of testing and/or self-quarantine restrictions that must be met prior to the employees' return to work. Determinations will be based, in part, on CDC Community Transmission levels for the employees' travel destination(s) and stay(s).

#### **Continuity of Community Life Programs: In-Home Supports (CL/IHS)**

- Any illness or symptoms of COVID-19 shall be reported to CL/IHS support employee immediately.
  - Employee may ask person supported if they:
    - Have been in the presence of or part of a group gathering of 10 or more people.
    - Whether or not they are experiencing symptoms of COVID-19 infection.
    - If the Individual supported has a family member (or someone they have been in close contact with) who may have been exposed to COVID-19 or has tested positive for COVID-19.
  - If individual supported has any symptoms, IHS employee will advise the Individual supported and, if appropriate, her/his family as to next steps. In addition, the CL/HIS employee shall notify the appropriate Program Manager.
- 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 will be offered to all people receiving CL/IHS supports.
- CL/IHS supports provided in community gathering places (e.g., libraries, community centers) may be limited by JFGH based on community vaccination rates. JFGH has established a 70% full vaccination and booster threshold at which point further restrictions may be eased and/or eliminated.

<b>Continuity of Community Life Programs: Group Homes (CL/GH)</b>
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- Any illness or symptoms of COVID-19 shall be reported to CL/GH support employee immediately.
  - Employee may ask person supported if they:
    - Have been in the presence of or part of a group gathering of 10 or more people.
    - Whether or not they are experiencing symptoms of COVID-19 infection.
  - A JFGH nurse and appropriate Program Manager are to be notified immediately. The nurse shall direct next medical/clinical steps.
  - JFGH reserves the right to relocate the person receiving support to a different home or other JFGH-owned or leased property should it be determined that doing so is in the best health interests of other people living in the GH.
- To reduce risk of exposure of people JFGH supports in CL/GH and the staff who support them, JFGH will follow CL/GH business practices as described below and which may change at any point in time:
  - Unvaccinated vendors or contractors should be scheduled at times when Individuals and staff can leave the home or maintain a safe distance from any workers unless urgent and approved by the Program Director.
  - To the fullest extent possible, physical distancing is to be practiced.
  - Supports provided in indoor community gathering places (e.g., libraries, community centers, etc.) may be limited by JFGH based on community vaccination rates and/or community transmission ratings (per CDC guidelines). JFGH has established a 70% full vaccination and booster threshold at which point further restrictions may be eased and/or eliminated.
  - The CDC Community Transmission level may also be used to modify supports provided in community indoors or outdoors.
- **Outdoor Visits:**
  - Visits must be scheduled not less than four (4) hours in advance with the Individual supported and Program Manager or Lead DSP.
  - In case of inclement weather, visits may be rescheduled.
  - Unvaccinated outdoor guest(s) shall:
    - wear a mask at all times throughout the visit
    - maintain physical distancing of 6-9 feet at all times
    - visit only on the property of but not inside the home
    - not conduct visits in vehicles or in any other enclosed space, in any circumstance.
    - not use house facilities and may not enter the home under any circumstances.
  - For fully vaccinated and boosted (evidence of which shall be required) visitor(s):
    - guests may accompany people supported in GHs on walks in/around the GH neighborhood.
    - Outdoor visits and other, related activities may include up to but not to exceed 10 people, all of whom must be fully vaccinated.
  - JFGH may, in its sole discretion, limit the number of visitors at any one time. In addition, a JFGH employee may be present during any visit.
  - If the guest(s) represents a threat to the potential health, safety, welfare, etc. the guest may be asked to cancel/end the visit prior to the initial scheduled time.

- **In House Visits:**
  - Visit(s) are permitted by fully vaccinated people only and must be scheduled and approved by the Individual supported and Program Manager not less than one full day/24 hours' notice.
    - Anyone whose vaccination is six (6) or more months old, evidence of a booster shall be required.
  - Visit(s) will be accommodated based on the Individual supported wishes as well as the schedules/activities of those they live with.
  - Visitor(s) may be required to answer a health screening questionnaire and submit it to the Program Manager or Community Support Lead (CSL) prior to the visit.
  - Visitor(s) temperatures will be taken prior to entry.
    - Any reading of 100.4 and above will result in a second reading being taken.
    - If the second reading is 100.4 or above, the visit will not proceed.
  - Visitor(s) will be required to sanitize their hands prior to entry. Any refusal to sanitize hands will result in cancellation of the visit.
  - Consistent with current CDC Guidelines, masks will be required of indoor visitors irrespective of vaccination or booster status.
  - No more than three (3) visitors during any visit.
  - Visit(s) may be limited to one hour or less.
  - Visitors acknowledge they are visiting the home of people who live in the house, and visitors are to respect the rights of all who live in the home.
- **Periodic and Extended Out of Home Visits:**
  - Individuals may visit friends who are fully vaccinated and families whose members are fully vaccinated outside JFGH. Prior to departing for any such visit, JFGH shall:
    - Confirm arrangements regarding departure and return date, which shall be made in advance, with the Individual, family/friend with whom the visit is to occur and Program Manager and/or CSL. Details to be reviewed include but are not limited to:
      - ✓ The length of the visit
      - ✓ Where and with whom the visit is likely to be and include
      - ✓ Intended return of the Individual to their home.
    - Anyone whose vaccination is six (6) or more months old, evidence of a booster shall be required.
  - It is the responsibility of the friend and/or family member with whom the visit is being arranged to follow any/all then-current guidelines (e.g., governmental/jurisdictional, CDC and others), including the use of masks, appropriate hand hygiene and physical distancing.
  - Any exposure during any out of home visit to a person who is known positive for COVID-19; or, a positive COVID-19 test result and/or the display of any symptoms of COVID-19, shall be disclosed to JFGH immediately.
  - Prior to the Individual's return to their home, the Individual and/or her/his friend or family member may be required to answer a health assessment, a series of questions about symptoms and activities, which shall be determined in the sole discretion of JFGH.

- Individuals supported by JFGH who are fully vaccinated and boosted may visit, as they choose, with family and friends who are not vaccinated; however, in any such instance, on return to their home:
  - the Individual may be required to produce a negative COVID-19 test that is not more than 24 hours old;
    - ✓ In limited circumstances, two negative test results within 48 hours or some other timeframe that shall be determined by JFGH may required for return to their home.
  - the Individual may be required to continuously wear a mask for a period of up to five (5) days while in the presence of other people with whom they live and staff; and/or,
  - the Individual may be required to quarantine to be established by JFGH, in its sole discretion, for a period of not less than five (5) days.

These requirements may be applied by JFGH in any order and without notice.
- In all cases, if at any point in time, Individual develops any symptoms of COVID-19 or at the discretion of JFGH due to concerns of potential infection (even if tested prior to returning home), JFGH may require:
  - Individual will quarantine in their room
  - Medical attention will be sought, and COVID-19 testing will be obtained
  - Individual may be relocated to another location for isolation per physician's recommendations, while awaiting test result(s), or at the discretion of JFGH.

#### **Continuity of Community Life Programs: MOST**

- In-person attendance at MOST is limited to only people who are fully vaccinated and boosted. For anyone not fully vaccinated, there will be virtual supports available.
- Individual must demonstrate ability and willingness to follow all safety guidelines and these protocols.
- Numbers of Individuals participating in in-person supports in the same location at the same time may be limited by JFGH.
- MOST may be organized around certain times of the day, and/or activities as part of formal supports, and/or cohorts of participants, any/all of which shall be based on CDC and related guidelines and jurisdictional requirements which may from time to time apply to MOST.
- MOST in-person supports may be suspended at any time based on, but not limited to, jurisdictional requirements, a positive test result for COVID-19 among people supported in MOST and/or the staff, or the mandated closure of any site at which MOST supports are being delivered.
- Individuals may be required to undergo a health assessment prior to entry to any MOST location, including but not limited to:
  - Temperatures will be taken prior to entry. Any reading of 100.4 and above will result in a second reading being taken. If the second reading is 100.4 or above, the person may not enter the MOST location.
  - Anyone entering the MOST location will be required to sanitize their hands prior to entry. Any refusal to sanitize hands will result in entry being denied.

- Masks may be required for any part of or the whole of the day.
- Physical distancing of 6-9 feet shall be maintained, to the extent practicable, through the day.
- If Individuals supported in MOST are sick or feeling unwell, they should stay home and not attend MOST.
  - If the Individual supported has a family member (or someone they have been in close contact with) who may have been exposed to COVID-19 or has tested positive for COVID-19, then the Individual shall disclose any such exposure, and the Individual will not be permitted to participate and may be required to quarantine for a period to be determined by JFGH.
  - If any Individual is sick, has been exposed to a person that is positive to COVID-19, has symptoms related to COVID-19, has traveled outside the United States, or has traveled to a substantial or high Community Transmission region within the United States that may require self-quarantine, they will not be permitted to participate with in-person programming.
- If an Individual receiving supports in MOST should display symptoms of or report any exposure to a person who is known to have COVID-19; or, if the Individual tests positive for COVID-19, it is to be reported to MOST leadership immediately. In any such circumstance:
  - Emergency contacts will be notified to pick up Individual supported should there be any reason to believe the Individual has been exposed to COVID-19 or is or has become ill.
  - Will be recommended for testing in the event there is a known or potential exposure.
  - May not receive in-person supports from staff until JFGH deems it safe but is eligible to participate in virtual supports as they may choose.
- MOST supports shall be developed to avoid groups of five (5) or more people who are either unvaccinated or whose vaccination status is unknown, or groups of up to 10 people who are all fully vaccinated.
- Community gatherings should be avoided until community vaccination rates, notwithstanding the above, until community vaccination and booster rates exceed 70%.

<b>Confidentiality</b>
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- All information that includes personally identifying details pertaining to COVID-19 infection status, testing or any other related information among individuals supported by JFGH and our DSPs is confidential and protected as private by the Health Insurance Portability and Accountability Act (HIPAA). No information is to be shared by any JFGH employee, 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, social media or on any other communication platform.
- 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.