



Fort Hudson Nursing Center

COVID-19 Plan

1. Purpose and Scope

Fort Hudson Nursing Center (Fort Hudson) is committed to providing a safe and healthy workplace for all our employees. Fort Hudson has developed the following COVID-19 plan, which includes policies and procedures to minimize the risk of transmission of COVID-19, in accordance with OSHA's COVID-19 Emergency Temporary Standard (ETS).

2. Roles and Responsibilities

Fort Hudson's goal is to prevent the transmission of COVID-19 in the workplace(s). Managers as well as non-managerial employees and their representatives are all responsible for supporting, complying with, and providing recommendations to further improve this COVID-19 plan.

The COVID-19 Safety Coordinator(s), listed below, implements and monitors this COVID-19 plan. The COVID-19 Safety Coordinator(s) has Fort Hudson's full support in implementing and monitoring this COVID-19 plan and has authority to ensure compliance with all aspects of this plan.

Fort Hudson and the COVID-19 Safety Coordinator(s) will work cooperatively with non-managerial employees and their representatives to conduct a workplace-specific hazard assessment and in the development, implementation, and updating of this COVID-19 plan.

Existing committee structure (Safety Committee and Safe Patient Handling Team) will have an expanded charge to include this ETS, as may be amended, and will be responsible for completing the Risk Assessment.

COVID-19 Safety Coordinator(s)		
Name	Title/Facility Location	Contact Information (office location, phone, email address)
Josh French	Director Plant Operations	jfrench@forthudson.com
Barb Celeste	Employee Health/Infection Control	bceleste@forthudson.com

3. Hazard Assessment and Worker Protections

Fort Hudson will conduct a workplace-specific hazard assessment of its workplace(s) to determine potential workplace hazards related to COVID-19. A hazard assessment will be conducted initially and whenever changes at the workplace create a new potential risk of employee exposure to COVID-19 (e.g., new work activities at the workplace).

Fort Hudson 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 ETS because there is no reasonable expectation that any person with suspected or confirmed COVID-19 will be present: Home Care and Certified Home Health Care Program office space (B wing basement), Business Office, therapy

documentation room, support department work areas, private offices, remote offices (no healthcare delivered).

Fort Hudson has developed the following policies and procedures to determine employees' vaccination status: Human Resources/Employee Health maintains a complete list of all employees and vaccination status.

Fort Hudson and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to conduct the workplace-specific hazard assessment. All completed hazard assessment forms and results will be attached to this plan and will be accessible to all employees and their representatives at each facility.

Fort Hudson will address the hazards identified by the assessment and include policies and procedures to minimize the risk of transmission of COVID-19 for each employee. These policies and procedures are as follows:

- COVID Safety Plan
- Use of PPE
- Employee Return to Work
- Transmission Based Precautions
- Other policies identified in the Emergency Management Plan

Patient Screening and Management

In settings where direct patient care is provided, Fort Hudson will:

- Limit and monitor points of entry to the setting – Front Reception, with exception for Day Care Registrants at S wing entrance;
- Screen and triage all clients, patients, residents, delivery people, visitors, and other non-employees entering the setting for symptoms of COVID-19;
- Implement other applicable patient management strategies in accordance with the CDC's "[COVID-19 Infection Prevention and Control Recommendations](#)"; and
- Encourage the use of telehealth services where available and appropriate in order to limit the number of people entering the workplace; where appropriate.

Fort Hudson has in place controlled visitation in accordance with NYS requirements, which include distancing. Entrances are secured to assure one point of entry for screening purposes. NOTE: Employees enter at designated locations and proceed directly to the screening area, avoiding all resident care areas until screen is completed.

Standard and Transmission-Based Precautions

Fort Hudson will develop and implement policies and procedures to adhere to Standard and Transmission-Based Precautions in accordance with CDC's "[Guidelines for Isolation Precautions](#)."

Fort Hudson and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to develop and implement these policies and procedures.

Personal Protective Equipment (PPE)

Fort Hudson will provide, and ensure that employees wear, facemasks or a higher level of respiratory protection. Facemasks must be worn by employees over the nose and mouth when indoors and when occupying a vehicle with another person for work purposes. Policies and procedures for facemasks will be implemented, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach.

Facemasks provided by Fort Hudson will be FDA-cleared, authorized by an FDA Emergency Use Authorization, or otherwise offered or distributed as described in an FDA enforcement policy. Fort Hudson will provide employees with a

sufficient number of facemasks, which must be changed at least once a day, whenever they are soiled or damaged, and more frequently as necessary (e.g., patient care reasons). Fort Hudson may also provide a respirator to employees when only a facemask is required (i.e., when a respirator is not otherwise required by OSHA's COVID-19 ETS) and, when doing so, will comply with OSHA's COVID-19 ETS mini respiratory protection program (29 CFR 1910.504). Fort Hudson will also permit employees to wear their own respirator instead of a facemask and, in such cases, will comply with OSHA's COVID-19 ETS mini respiratory protection program (29 CFR 1910.504). Additional information about when respirator use is required can be found below.

Refer to [Respiratory Protection Program](#) for additional details on use of N95 masks.

Paragraph (a)(4) of the ETS exempts fully vaccinated employees from the PPE requirements of the ETS when in well-defined areas where there is no reasonable expectation that any person with suspected or confirmed COVID-19 will be present. The following are additional exceptions to Fort Hudson's requirements for facemasks:

1. When an employee is alone in a room.
2. While an employee is eating and drinking at the workplace, provided each employee is at least 6 feet away from any other person, or separated from other people by a physical barrier (or in accordance with NYS regulation or executive order).
3. When employees are wearing respirators in accordance with 29 CFR 1910.134 or paragraph (f) of OSHA's COVID-19 ETS.
4. 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, Fort Hudson will ensure that each employee wears an alternative, such as a face shield, if the conditions permit.
5. When employees cannot wear facemasks due to a medical necessity, medical condition, or disability as defined in the Americans with Disabilities Act (42 USC 12101 et seq.), or due to religious belief. 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 with the Americans with Disability Act (42 USC 12101 et seq.), including a person who cannot independently remove the facemask. The remaining portion of the subset who cannot wear a facemask may be exempted on a case-by-case basis as required by the Americans with Disability Act and other applicable laws. When an exception applies, Fort Hudson will ensure that any such employee wears a face shield, if their condition or disability permits it. Fort Hudson will provide accommodations for religious beliefs consistent with Title VII of the Civil Rights Act.
6. When Fort Hudson has demonstrated that the use of a facemask presents a hazard to an employee of serious injury or death (e.g., arc flash, heat stress, interfering with the safe operation of equipment). When this is the case, Fort Hudson will ensure that each employee wears an alternative, such as a face shield, if the conditions permit. Any employee not wearing a facemask must remain at least 6 feet away from all other people unless the employer can demonstrate it is not feasible. The employee must resume wearing a facemask when not engaged in the activity where the facemask presents a hazard.

If a face shield is required to comply with OSHA's COVID-19 ETS or Fort Hudson otherwise requires use of a face shield, Fort Hudson will ensure that face shields are cleaned at least daily and are not damaged.

Fort Hudson will not prevent any employee from voluntarily wearing their own facemask and/or face shield in situations when they are not required unless doing so would create a hazard of serious injury or death, such as interfering with the safe operation of equipment.

In addition to providing, and ensuring employees wear, facemasks, Fort Hudson will provide protective clothing and equipment (e.g., respirators, gloves, gowns, goggles, face shields) to each employee in accordance with Standard and Transmission-Based Precautions in healthcare settings in accordance with CDC's "[Guidelines for Isolation Precautions](#)," and ensure that the protective clothing and equipment is used in accordance with OSHA's PPE standards (29 CFR 1910 subpart I).

See [Personal Protective Equipment](#) policy.

For employees with exposure to people with suspected or confirmed COVID-19, Fort Hudson will provide respirators and other PPE, including gloves, an isolation gown or protective clothing, and eye protection. Fort Hudson will ensure respirators are used in accordance with the OSHA Respiratory Protection standard (29 CFR 1910.134), and other PPE is used in accordance with OSHA's PPE standards (29 CFR 1910 subpart I).

See [Personal Protective Equipment](#) policy.

See [Respiratory Protection Program](#) policy.

For aerosol-generating procedures (AGPs) on a person with suspected or confirmed COVID-19, Fort Hudson will provide a respirator to each employee and ensure it is used in accordance with the OSHA Respiratory Protection standard (29 CFR 1910.134). Fort Hudson will also provide gloves, an isolation gown or protective clothing, and eye protection to each employee, and ensure use in accordance with OSHA's PPE standards (29 CFR 1910 subpart I).

See [Personal Protective Equipment](#) policy.

Fort Hudson and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees or representatives to assess and address COVID-19 hazards, including when there is employee exposure to people with suspected or confirmed COVID-19. [OSHA's [COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis](#) may be used.]

Aerosol-generating procedures (AGPs) on a person with suspected or confirmed COVID-19.

When an AGP is performed on a person with suspected or confirmed COVID-19, Fort Hudson will:

- Provide a respirator and other appropriate PPE, as discussed in the previous section;
- Limit the number of employees present during the procedure to only those essential for patient care and procedure support;
- Ensure that the procedure is performed in an existing airborne infection isolation room (AIIR), if available; and
- Clean and disinfect the surfaces and equipment in the room or area where the procedure was performed, after the procedure is completed.

Fort Hudson and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to assess and address COVID-19 hazards while performing AGPs.

Physical Distancing

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

Fort Hudson and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to assess physical distancing in the workplace.

General signage for visitors and employees is posted prominently throughout the facility.

Employees are discouraged from congregating in common space and must be masked at all times (except when eating)

while in the facility.

Floor markers are in place in common areas (or signage) to advise visitors and staff of social distancing requirements.

As determined necessary, staff able to work remotely may be assigned to hybrid or rotating schedules to reduce density in some work areas.

Physical Barriers

Fort Hudson will install physical barriers at each fixed work location outside of direct patient care areas where each employee is not separated from all other people by at least 6 feet of distance and spacing cannot be increased, unless it can be demonstrated that it is not feasible to install such physical barriers. Physical barriers will be implemented, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach. The duration of potential contact, nature of contact, and the use of PPE will be taken into consideration with determining use and location of barriers.

Fort Hudson and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to identify where physical barriers are needed. Physical barriers are not required in direct patient care areas or resident rooms.

Where feasible, Fort Hudson will ensure that:

- Physical barriers are solid and made from impermeable materials;
- Physical barriers are easily cleanable or disposable;
- Physical barriers are sized (i.e., height and width) and located to block face-to-face pathways between individuals based on where each person would normally stand or sit;
- Physical barriers are secured so that they do not fall or shift, causing injury or creating a trip or fall hazard;
- Physical barriers do not block workspace air flow or interfere with the heating, ventilation, and air conditioning (HVAC) system operation;
- Physical barriers are transparent in cases where employees and others have to see each other for safety; and
- Physical barriers do not interfere with effective communication between individuals.

Physical Barriers

- Where:
 - There are no identified locations where fixed physical barriers have been determined to be appropriate or functionally feasible in areas which employees are reasonably expected to come in contact with suspect or confirmed COVID 19.
- How:
 - Not applicable

Cleaning and Disinfection

Fort Hudson will implement policies and procedures for cleaning, disinfection, and hand hygiene, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach. Fort Hudson and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to implement cleaning, disinfection, and hand hygiene in the workplace.

In patient care areas, resident rooms, and for medical devices and equipment:

Fort Hudson will follow standard practices for cleaning and disinfection of surfaces and equipment in accordance with CDC's "[COVID-19 Infection Prevention and Control Recommendations](#)" and CDC's "[Guidelines for Environmental Infection Control](#)."

In all other areas:

Fort Hudson requires the cleaning of high-touch surfaces and equipment at least once a day, following manufacturers' instructions for the application of cleaners.

When a person who is COVID-19 positive has been in the workplace within the last 24 hours, Fort Hudson requires cleaning and disinfection, in accordance with CDC's "[Cleaning and Disinfecting Guidance](#)," of any areas, materials, and equipment that have likely been contaminated by that person (e.g., rooms they occupied, items they touched).

[Refer to departmental specific policies on cleaning and disinfecting procedures.](#)

Fort Hudson will provide alcohol-based hand rub that is at least 60% alcohol or provide readily accessible hand washing facilities. In addition, signs will be posted encouraging frequent handwashing and use of hand sanitizers.

Hand sanitizing stations are located through the facility and at identified locations near entrances/exits.

Ventilation

Fort Hudson will implement policies and procedures for the facility's heating, ventilation, and air conditioning (HVAC) system and ensure that:

- The HVAC system(s) is used in accordance with the manufacturer's instructions and the design specifications of the HVAC system(s);
- The amount of outside air circulated through the HVAC system(s) and the number of air changes per hour are maximized to the extent appropriate;
- All air filters are rated Minimum Efficiency Reporting Value (MERV) 13 or higher, if compatible with the HVAC system(s); if not compatible, the filter with the highest compatible filtering efficiency is used (NOTE: system is not capable of MERV 13; will filter at highest capacity of the system);
- All air filters are maintained and replaced as necessary to ensure the proper function and performance of the HVAC system;
- All intake ports that provide outside air to the HVAC system(s) are cleaned, maintained, and cleared of any debris that may affect the function and performance of the HVAC system(s); and
- Existing airborne infection isolation rooms (AIIRs), if any, are maintained and operated in accordance with their design and construction criteria (facility has no AIIRs).

Ventilation policies and procedures will be implemented, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach. Fort Hudson will identify the building manager, HVAC professional, or maintenance staff member who can certify that the HVAC system(s) are operating in accordance with the ventilation provisions of OSHA's COVID-19 ETS and list the individual(s) below.

- Opening windows and doors during work hours when outdoor climate allows, and when doing so would not present other health or safety hazards. This is generally not feasible due to disruption in air balancing in both heat and cooling seasons.

The following individual(s) is responsible for maintaining the HVAC system(s) and can certify that it is operating in accordance with the ventilation provisions of OSHA's COVID-19 ETS.	
<u>Name/Contact Information:</u> Josh French or Maintenance On-Call personnel	<u>Location:</u> Refer to emergency call list
<u>Name/Contact Information:</u> Siemens	<u>Location:</u> External Contractor

Health Screening and Medical Management

Health Screening

Fort Hudson will screen each employee before each workday and each shift.

Employees will use the Accushield self-check in protocols or the receptionist for screening.

Employee Notification to Employer of COVID-19 Illness or Symptoms

Fort Hudson will require employees to promptly notify their supervisor or Employee Health when they have tested positive for COVID-19 or been diagnosed with COVID-19 by a licensed healthcare provider, have been told by a licensed healthcare provider that they are suspected to have COVID-19, are experiencing recent loss of taste and/or smell with no other explanation, or are experiencing both fever ($\geq 100.4^{\circ}$ F) and new unexplained cough associated with shortness of breath.

Employees will adhere to established policies for sick call.

Employer Notification to Employees of COVID-19 Exposure in the Workplace

Fort Hudson will notify employees if they have been exposed to a person with COVID-19 at their workplace, as described below. The notification provisions below are not triggered by the presence of a patient with confirmed COVID-19 in a workplace where services are normally provided to suspected or confirmed COVID-19 patients. When Fort Hudson is notified that a person who has been in the workplace (including employees, clients, patients, residents, vendors, contractors, customers, delivery people and other visitors, or other non-employees) is COVID-19 positive, Fort Hudson will, within 24 hours:

- Notify each employee who was not wearing a respirator and any other required PPE and has been in close contact with the person with COVID-19 in the workplace. The notification must state the fact that the employee was in close contact with someone with COVID-19 along with the date(s) the contact occurred.
- Notify all other employees who were not wearing a respirator and any other required PPE and worked in a well-defined portion of a workplace (e.g., a particular floor) in which the person with COVID-19 was present during the potential transmission period. The notification must specify the date(s) the person with COVID-19 was in the workplace during the potential transmission period.
- Notify other employers whose employees were not wearing a respirator and any other required PPE and have been in close contact with the person with COVID-19 or worked in a well-defined portion of a workplace (e.g., a particular floor) in which that person was present, during the potential transmission period. The notification must specify the date(s) the person with COVID-19 was in the workplace during the potential transmission period and the location(s) where the person with COVID-19 was in the workplace.

Notifications will not include the name, contact information, or occupation of the COVID-19 positive person.

Note: Close contact means being within 6 feet of the person for a cumulative total of 15 minutes or more over a 24-hour period during the person's potential transmission period. The potential transmission period runs from 2 days before the person felt sick (or, if not showing symptoms, 2 days before testing) until the time the person is isolated.

Notification will include direct information, written notice, web site and/or social media platforms.

Medical Removal from the Workplace

Fort Hudson has also implemented a policy for removing employees from the workplace in certain circumstances. Fort Hudson will immediately remove an employee from the workplace when:

- The employee is COVID-19 positive (i.e., confirmed positive test for, or has been diagnosed by a licensed healthcare provider with, COVID-19);
- The employee has been told by a licensed healthcare provider that they are suspected to have COVID-19;
- The employee is experiencing recent loss of taste and/or smell with no other explanation; or
- The employee is experiencing both a fever of at least 100.4°F and new unexplained cough associated with shortness of breath; or other symptoms identified as associated with COVID 19.

For employees removed because they are COVID-19 positive, Fort Hudson will keep them removed until they meet the return-to-work criteria discussed below. For employees removed because they have been told by a licensed healthcare provider that they are suspected to have COVID-19, or are experiencing symptoms as discussed above, Fort Hudson will keep them removed until they meet the return-to-work criteria discussed below.

If Fort Hudson notifies an employee that they were in close contact with a person in the workplace (including employees, clients, patients, residents, vendors, contractors, customers, delivery people and other visitors, or other non-employees) who is COVID-19 positive when that employee was not wearing a respirator and any other required PPE, Fort Hudson will immediately remove the employee from the workplace unless:

1. The employee does not experience recent loss of taste and/or smell with no other explanation, or fever of at least 100.4°F and new unexplained cough associated with shortness of breath (or other COVID related symptoms); AND
2. The employee has either been fully vaccinated against COVID-19 (i.e., 2 weeks or more following the final dose) or had COVID-19 and recovered within the past 3 months.

See [Return to Work Policy](#) for details.

Any time an employee must be removed from the workplace, Fort Hudson may require the employee to work remotely or in isolation if suitable work is available. When allowing an employee to work remotely or in insolation, Fort Hudson will continue to pay that employee the same regular pay and benefits the employee would have received had the employee not been absent.

Fort Hudson will not subject its employees to any adverse action or deprivation of rights or benefits because of their removal from the workplace due to COVID-19.

Return to Work Criteria

Fort Hudson will only allow employees who have been removed from the workplace to return to work in accordance with guidance from a licensed healthcare provider or in accordance with the CDC's "[Isolation Guidance](#)" and "[Return to Work Healthcare Guidance](#)."

If an employee has severe COVID-19 or an immune disease, Fort Hudson will follow the guidance of a licensed healthcare provider regarding return to work.

See [Return to Work](#) policies for additional detail, as guidelines change.

Medical Removal Protection Benefits

Fort Hudson will continue to pay employees who have been removed from the workplace under the medical removal provisions of OSHA's COVID-19 ETS. When an employee has been removed from the workplace and is not working remotely or in isolation, Fort Hudson will provide required benefits consistent with current regulation, subject to change.

- Employers must continue to provide the benefits to which the employee is normally entitled and pay the employee the same regular pay the employee would have received had the employee not been absent from work, up to \$1,400 per week per employee. For employers with fewer than 500 employees, the employer must pay the employee up to the \$1,400 per week cap but, beginning in the third week of an employee's removal, the amount is reduced to only two-thirds of the same regular pay the employee would have received had the employee not been absent from work, up to \$200 per day (\$1000 per week in most cases).
- The ETS also provides that the employer's payment obligation is reduced by the amount of compensation the employee receives from any other source, such as a publicly or employer-funded compensation program (e.g., paid sick leave, administrative leave), for earnings lost during the period of removal or any additional source of income the employee receives that is made possible by virtue of the employee's removal.]

Vaccination

Fort Hudson encourages employees to receive the COVID-19 vaccination as a part of a multi-layered infection control approach. Fort Hudson will support COVID-19 vaccination for each employee by providing reasonable time and paid leave to each employee for vaccination and any side effects experienced following vaccination.

See [Vaccination – COVID 19](#) for additional information.

Training

Fort Hudson will implement policies and procedures for employee training, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach. Fort Hudson and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to assess COVID-19 hazards and implement an employee training program at each facility.

Fort Hudson's COVID-19 training program will be accessible in the following ways:

- Relias Training Platform
- Staff Development Personnel

Fort Hudson will ensure that each employee receives training, in a language and at a literacy level the employee understands, on the following topics:

- COVID-19, including:
 - How COVID-19 is transmitted (including pre-symptomatic and asymptomatic transmission);
 - The importance of hand hygiene to reduce the risk of spreading COVID-19 infections;
 - Ways to reduce the risk of spreading COVID-19 through proper covering of the nose and mouth;
 - The signs and symptoms of COVID-19;
 - Risk factors for severe illness; and
 - When to seek medical attention;

- Fort Hudson’s policies and procedures on patient screening and management;
- Tasks and situations in the workplace that could result in COVID-19 infection;
- Workplace-specific policies and procedures to prevent the spread of COVID-19 that are applicable to the employee’s duties (e.g., policies on Standard and Transmission-Based Precautions, physical distancing, physical barriers, ventilation, aerosol-generating procedures);
- Employer-specific multi-employer workplace agreements related to infection control policies and procedures, the use of common areas, and the use of shared equipment that affect employees at the workplace;
- Fort Hudson’s policies and procedures for PPE worn to comply with OSHA’s COVID-19 ETS, including:
 - When PPE is required for protection against COVID-19;
 - Limitations of PPE for protection against COVID-19;
 - How to properly put on, wear, and take off PPE;
 - How to properly care for, store, clean, maintain, and dispose of PPE; and
 - Any modifications to donning, doffing, cleaning, storage, maintenance, and disposal procedures needed to address COVID-19 when PPE is worn to address workplace hazards other than COVID-19;
- Workplace-specific policies and procedures for cleaning and disinfection;
- Fort Hudson’s policies and procedures on health screening and medical management;
- Available sick leave policies, any COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws, and other supportive policies and practices (e.g., telework, flexible hours);
- The identity of Fort Hudson’s Safety Coordinator(s) specified in this COVID-19 plan;
- OSHA’s COVID-19 ETS; and
- How the employee can obtain copies of OSHA’s COVID-19 ETS and any employer-specific policies and procedures developed under OSHA’s COVID-19 ETS, including this written COVID-19 plan.

Fort Hudson will ensure that the training is overseen or conducted by a person knowledgeable in the covered subject matter as it relates to the employee’s job duties, and that the training provides an opportunity for interactive questions and answers with a person knowledgeable in the covered subject matter as it relates to the employee’s job duties.

Fort Hudson will provide additional training whenever changes occur that affect the employee’s risk of contracting COVID-19 at work (e.g., new job tasks), policies or procedures are changed, or there is an indication that the employee has not retained the necessary understanding or skill.

Anti-Retaliation

Fort Hudson will inform each employee that employees have a right to the protections required by OSHA’s COVID-19 ETS, and that employers are prohibited from discharging or in any manner discriminating against any employee for exercising their right to protections required by OSHA’s COVID-19 ETS, or for engaging in actions that are required by OSHA’s COVID-19 ETS.

Fort Hudson will not discharge or in any manner discriminate against any employee for exercising their right to the protections required by OSHA’s COVID-19 ETS, or for engaging in actions that are required by OSHA’s COVID-19 ETS.

Requirements implemented at no cost to employees

Fort Hudson will comply with the provisions of OSHA’s COVID-19 ETS at no cost to its employees, with the exception of any employee self-monitoring conducted under the Health Screening and Medical Management section of this Plan.

Recordkeeping

Fort Hudson will retain all versions of this COVID-19 plan implemented to comply with OSHA's COVID-19 ETS while the ETS remains in effect.

Fort Hudson will establish and maintain a COVID-19 log to record each instance in which an employee is COVID-19 positive, regardless of whether the instance is connected to exposure to COVID-19 at work. The COVID-19 log will contain, for each instance, the employee's name, one form of contact information, occupation, location where the employee worked, the date of the employee's last day at the workplace, the date of the positive test for, or diagnosis of, COVID-19, and the date the employee first had one or more COVID-19 symptoms, if any were experienced.

Fort Hudson will record the information on the COVID-19 log within 24 hours of learning that the employee is COVID-19 positive. Fort Hudson will maintain the COVID-19 log as a confidential medical record and will not disclose it except as required by OSHA's COVID-19 ETS or other federal law.

Fort Hudson will maintain and preserve the COVID-19 log while OSHA's COVID-19 ETS remains in effect.

By the end of the next business day after a request, Fort Hudson will provide, for examination and copying:

- All versions of the written COVID-19 plan to all of the following: any employees, their personal representatives, and their authorized representatives.
- The individual COVID-19 log entry for a particular employee to that employee and to anyone having written authorized consent of that employee;
- A version of the COVID-19 log that removes the names of employees, contact information, and occupation, and only includes, for each employee in the COVID-19 log, the location where the employee worked, the last day that the employee was at the workplace before removal, the date of that employee's positive test for, or diagnosis of, COVID-19, and the date the employee first had one or more COVID-19 symptoms, if any were experienced, to all of the following: any employees, their potential representatives, and their authorized representatives.

Reporting

Fort Hudson will report to OSHA:

- Each work-related COVID-19 fatality within 8 hours of Fort Hudson learning about the fatality;
- Each work-related COVID-19 in-patient hospitalization within 24 hours of Fort Hudson learning about the in-patient hospitalization.

4. Monitoring Effectiveness

Fort Hudson and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to monitor the effectiveness of this COVID-19 plan to ensure ongoing progress and efficacy.

Fort Hudson will update this COVID-19 plan as needed to address changes in workplace-specific COVID-19 hazards and exposures.

5. Coordination with Other Employers

Fort Hudson 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.

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

Plan will be made available in a public location (e.g. website).

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

Other Worksite Employers	
Employer Name / Employer Representative:	Contact Information:
Hudson Headwaters Health Network	Tucker Slingerland MD tslingerland@hhhn.org
Sodexo Senior Services	Mccullough, Rebecca <Rebecca.Mccullough@sodexo.com>
Select Rehabilitation	John Murray jmurray@selectrehab.com

6. Entering Residences

Fort Hudson will identify potential hazards and implement measures to protect employees who, in the course of their employment, enter into private residences and other physical locations controlled by a person not covered by the Occupational Safety & Health Act of 1970 (OSH Act). Fort Hudson requires that employee adhere to COVID-19 protocols while conducting work activities at private residences or other physical locations not covered by the OSH Act.

Employees will be provided appropriate PPE for use in the locations not covered by the OSH Act, including private residences. In the event the employee feels the protections in the home setting are inadequate, they may withdraw from that case upon request to their supervisor. Every effort will be made to address any identified issue which is felt to be inadequate.

7. Signature and Plan Availability

Fort Hudson has prepared and issued this COVID-19 plan on June 30, 2021.

Employer Name:	Fort Hudson Nursing Center
Address:	319 Broadway, Fort Edward, NY 12828
Business Owner:	N/A

This COVID-19 plan is available:

<input type="checkbox"/> Via hard copy at Fort Hudson Nursing Center	<input type="checkbox"/> Posted to www.forthudson.com	<input type="checkbox"/> Available by request. Contact the Administrator at 518-747-2811
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This model plan is intended to provide information about OSHA's COVID-19 Emergency Temporary Standard. The Occupational Safety and Health Act requires employers to comply with safety and health standards promulgated by OSHA or by a state with an OSHA-approved state plan. However, this model plan is not itself a standard or regulation, and it creates no new legal obligations.