

Mary Free Bed Rehabilitation Hospital COVID-19 Plan

1. Purpose and Scope

Mary Free Bed Rehabilitation Hospital is committed to providing a safe and healthy workplace for all our employees. Mary Free Bed 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).

Mary Free Bed has multiple workplaces that are substantially similar, and therefore has developed a single COVID-19 plan for the substantially similar workplaces, with site-specific considerations included in the table below.

Facility Type	Worksite-Specific COVID-19 Considerations
Hospital/SAR	Currently covered by OSHA-ETS. The SAR (Sub-Acute Rehab) may have additional requirements due to the high-risk population they serve. SAR leadership may adopt or add to these standards as needed.
Ambulatory Care	Not currently impacted by OSHA ETS
Administrative Support	Not currently impacted by OSHA ETS if at a separate address from a hospital location.

2. Roles and Responsibilities

Mary Free Bed'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 Mary Free Bed's full support in implementing and monitoring this COVID-19 plan, and has authority to ensure compliance with all aspects of this plan.

Mary Free Bed and the COVID-19 Safety Coordinator(s) will work cooperatively with the Unit-Based Council and other non-managerial committees to review the response plan and

COVID-19 Safety Coordinator(s)		
Title	Name	Contact Information (office location, phone, email address)
Security and Emergency Manager	Brad Estep	Bradley.estep@maryfreebed.com 513-833-6951
Security Control Desk Officer	(24-hour support)	Security.staff@maryfreebed.com 616-840-8015

3. Hazard Assessment and Worker Protections

Mary Free Bed 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).

Mary Free Bed 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:

- Private offices, conference rooms, and common areas in non-clinical suites at 350 Lafayette Ave SW (POB/MIHC)
- All Ambulatory Care Settings

Mary Free Bed has developed the procedures to determine employees' vaccination status:

- For new employees, vaccination status will be confirmed as part of the on-boarding physical.
- Current employees are encouraged to notify Infection Prevention in order to have their vaccination status confirmed.

Mary Free Bed 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.

Mary Free Bed will address the hazards identified by the assessment and include policies/procedures to minimize the risk of transmission of COVID-19 for each employee. To help employers determine appropriate precautions, OSHA has divided job tasks into four risk-exposure levels: very high, high, medium, and lower risk. OSHA expects that most American workers will likely fall in the lower-exposure risk (caution) or medium-exposure risk levels.

Mary Free Bed Rehabilitation Hospital will evaluate employee risk level and implement appropriate protections. OSHA's classification system is as follows:

A. Very High Exposure Risk:

1. Very high exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures. Workers in this category include:
2. Health care workers (e.g., doctors, nurses, dentists, paramedics, emergency medical technicians) performing aerosol-generating procedures (e.g., intubation, cough induction procedures, bronchoscopies, some dental procedures and exams, or invasive specimen collection) on known or suspected COVID-19 patients.
3. Health care or laboratory personnel collecting or handling specimens from known or suspected COVID-19 patients (e.g., manipulating cultures from known or suspected COVID-19 patients).
4. Morgue workers performing autopsies, which generally involve aerosol-generating procedures, on the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death.

B. High Exposure Risk:

1. High exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19. Workers in this category include:
2. Health care delivery and support staff (e.g., doctors, nurses, and other hospital staff who must enter patients' rooms) exposed to known or suspected COVID-19 patients. (Note: when such workers perform aerosol-generating procedures, their exposure risk level becomes very high.)
3. Medical transport workers (e.g., ambulance vehicle operators) moving known or suspected COVID-19 patients in enclosed vehicles.
4. Mortuary workers involved in preparing (e.g., for burial or cremation) the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death.

C. Medium Exposure Risk:

1. Medium exposure risk jobs include those that require frequent and/or close contact with (i.e., within six feet) people who may be infected with COVID-19, but who are not known or suspected

COVID-19 patients. In areas without ongoing community transmission, workers in this risk group may have frequent contact with travelers who may return from international locations with widespread COVID-19 transmission. In areas where there is ongoing community transmission, workers in this category may have contact with the general public (e.g., schools, high-population density work environments, some high-volume retail settings).

D. Lower Exposure Risk (Caution):

1. Lower exposure risk (caution) jobs are those that do not require contact with people known to be, or suspected of being, infected with COVID-19 nor frequent close contact with (i.e., within 6 feet of) the general public. Workers in this category have minimal occupational contact with the public and other coworkers.

Patient Screening and Management

In settings where direct patient care is provided, Mary Free Bed will:

- Limit and monitor points of entry to the setting;
- Screen and triage all clients, patients, residents, delivery people, visitors, and other non-employees entering the setting for symptoms of COVID-19.
 - Screening will be conducted at the entrance by staff using the screening tool attached (Appendix A).
 - When possible, screening will include a temperature check.
- Implement other applicable patient management strategies in accordance with the CDC's "COVID-19 Infection Prevention and Control Recommendations"; and

Standard and Transmission-Based Precautions

Mary Free Bed will develop and implement policies and procedures to adhere to Standard and Transmission-Based Precautions in accordance with CDC's "Guidelines for Isolation Precautions." These standards can be found in policy tech under policy:

[IC.012-Isolation or Transmission Based Precautions](#)

Mary Free Bed 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)

Mary Free Bed 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 Mary Free Bed will be FDA-cleared, authorized by an FDA Emergency Use Authorization, or otherwise offered or distributed as described in an FDA enforcement policy. Mary Free Bed 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). Mary Free Bed 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). Mary Free Bed 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.

Facemasks will be made available at all public entrances where masking is required and instruction on the appropriate donning of facemasks will be provided by the screener.

The following are additional exceptions to Mary Free Bed'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.
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, Mary Free Bed 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, Mary Free Bed will ensure that any such employee wears a face shield, if their condition or disability permits it. Mary Free Bed will provide accommodations for religious beliefs consistent with Title VII of the Civil Rights Act.
6. When Mary Free Bed 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, Mary Free Bed 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 Mary Free Bed otherwise requires use of a face shield, Mary Free Bed will ensure that face shields are cleaned at least daily and are not damaged.

Mary Free Bed 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, Mary Free Bed 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).

For questions regarding PPE, please contact Infection Prevention or reference policy:

[IC.010 Standard Precautions](#)

For employees with exposure to people with suspected or confirmed COVID-19, Mary Free Bed will provide respirators and other PPE, including gloves, an isolation gown or protective clothing, and eye protection. Mary Free Bed 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).

For aerosol-generating procedures (AGPs) on a person with suspected or confirmed COVID-19, Mary Free Bed will provide a respirator to each employee and ensure it is used in accordance with the OSHA Respiratory Protection standard (29 CFR 1910.134). Mary Free Bed 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).

Mary Free Bed 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, Mary Free Bed will:

- Provide a respirator and other 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.

Mary Free Bed 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

Mary Free Bed 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, Mary Free Bed 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.

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

To adhere to physical distancing requirements, Mary Free Bed has made the following changes to normal operations:

- Removed seating in common areas to allow for 6 feet between groups.
- Signage for visitors directing them to maintain 6-feet between groups when waiting in registration lines where applicable.
- Updated and posted capacity limits for conference rooms, gathering areas, and private offices to reflect social distancing requirements based on square footage.
- Created policies that allow for more staff members to telecommute based on organization needs.

Physical Barriers

Mary Free Bed 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.

Mary Free Bed and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to identify where physical barriers are needed.

Where feasible, Mary Free Bed 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.

In response to previous mandates, Mary Free Bed has added clear plexiglass barriers to the following locations:

- Public facing fixed workstations at the main hospital (e.g., West Desk, Main Lobby Registrations, Outpatient Reception Desks)
- COVID Screening checkpoints at all locations.
- Reception Desks at Off-site locations

Cleaning and Disinfection

Mary Free Bed 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. Mary Free Bed 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. [\[OSHA's COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis may be used to assess COVID-19-related hazards and develop and implement policies and procedures for cleaning and disinfection.\]](#)

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

Mary Free Bed 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:

Mary Free Bed 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, Mary Free Bed 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).

The Environmental Services (EVS) team at Mary Free Bed is responsible for cleaning and disinfection at the hospital. The schedule and related procedures are developed by the EVS Manager and Director of Facilities to comply with regulatory requirements. These teams will follow current standards for terminal cleaning in the event a COVID positive patient is identified and have also adopted the following additional measures:

- The use of Surface Armor product on all touchpoints and common areas (antimicrobial treatment)
- The use of Xenex Robot for UV sterilization of rooms after discharge of COVID + patient.
- Additional details and guidance can be found in [PSE.021 Infection Control- Environmental Services](#)

Mary Free Bed 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.]

All staff are expected to adhere to the Wash-in/Wash-out standards for hand hygiene and follow related procedures included in the IC.010 Standard Precautions policy.

Ventilation

Mary Free Bed will implement policies and procedures for each 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;
- 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.

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. Mary Free Bed 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.

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> Doug Carney, Director of Facilities	<u>Location:</u> Main Campus- Grand Rapids

Health Screening and Medical Management

Health Screening

Employee Screening Before Entering the Workplace

All employees are required to complete a self-screening prior to beginning their workday. Relevant screening questions will be provided to staff via the template in Appendix B. Employees are prohibited from entering the workplace without successfully completing a self-screening assessment. Screening compliance will be tracked by Employee Attestation points located at Entrances to the campus. All employees are required to swipe their badge on an attestation point prior to beginning their shift.

If an employee fails the screening process, he or she will be prevented from entering the premises until allowed to return to work under the relevant executive orders or public health orders, which requirements are explained in detail in the Return to Work Plan, attached as Appendix C. A health care provider's note is not required to validate an illness or to return to work (although the employee must still meet the relevant criteria to return to work).

Employee Notification to Employer of COVID-19 Illness or Symptoms

MaryFree Bed will require employees to promptly notify their supervisor and the Infection Prevention Manager 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.

Procedures for Reporting Illness

- If an employee believes that they qualify as a Suspected Case (as described above), they must stay home and:
 - Immediately notify their supervisor and Infection Control Manager
 - If exhibiting one or more symptoms, seek testing for COVID-19 at MFB or your preferred site, employee will not be able to work while waiting for test results; and
 - If not exhibiting symptoms, monitor yourself for 14 days using the temperature log. If symptoms begin contact Infection Control Manager.
 - Seek immediate medical care or advice as needed.
 -

COVID-19 testing:

- A nasopharyngeal (NP) specimen collected by a health care provider; or
- An oropharyngeal (OP) specimen collected by a health care provider; or
- A nasal mid-turbinate swab collected by a health care provider or by a supervised onsite self-collection (using a flocced tapered swab); or
- An anterior nares (nasal swab) specimen collected by a health care provider or by onsite or home self-collection (using a flocced or spun polyester swab); or
- Nasopharyngeal wash/aspirate or nasal wash/aspirate (NW) specimen collected by a health care provider.
 - If an employee qualifies as a Positive Case, MaryFree Bed Rehabilitation Hospital will immediately notify the local public health department and:
 - Notify all employees within 24 hours, who may have been exposed (being within approximately six feet for a prolonged period without PPE) with the employee in the past two days (while not disclosing the identity of the employee to ensure the individual's privacy), and
 - Ensure that the entire workplace, or affected parts thereof (depending on employee's presence in the workplace), is thoroughly cleaned, disinfected and isolated, and
 - If necessary, close the work area or workplace, until all necessary cleaning and disinfecting is completed, and
 - Communicate with employees about the presence of a confirmed case, the cleaning/disinfecting plans and when the workplace will reopen.

- Confirmed Cases
 - An employee will be considered a Confirmed Case of COVID-19 if the employee has been performing in- person operations in the past three days and that person tested positive for COVID-19. To return, the employee must meet these conditions:
 - If an employee believes that he or she qualifies as a Confirmed Case (as described above), they must:
 - Immediately notify supervisor and/or Human Resources contact of his or her diagnosis; and
 - Remain out of the workplace until they are cleared to return to work. Must be:
 - At least three days (72 hours) have passed *since recovery* defined as resolution of fever without the use of fever-reducing medications **and**
 - Improvement in respiratory symptoms (e.g., cough, shortness of breath) **and**,
 - At least 10 days have passed *since symptoms first appeared*.

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

Mary Free Bed 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 (e.g., emergency rooms, urgent care facilities, COVID-19 testing sites, COVID-19 wards in hospitals). When Mary Free Bed 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, Mary Free Bed 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.

Notifications will be coordinated by the Infection Prevention Manager and the employee's direct supervisor.

Medical Removal from the Workplace

Mary Free Bed has also implemented a policy for removing employees from the workplace in certain circumstances. Mary Free Bed 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.

For employees removed because they are COVID-19 positive, [MaryFree Bed](#) 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, Mary Free Bed will keep them removed until they meet the return-to-work criteria discussed below or keep them removed and provide a COVID-19 polymerase chain reaction (PCR) test at no cost to the employee. If the employee tests negative, they can return to work immediately. If the employee tests positive or refuses a test, they must remain excluded from the workplace until the return-to-work criteria below are met. If the employee refuses to take the test, Mary Free Bed will continue to keep the employee removed from the workplace, but is not obligated to provide the medical removal protection benefits discussed below.

If Mary Free Bed 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, Mary Free Bed 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; 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.

Mary Free Bed will keep the employee removed from the workplace for 14 days or will keep the employee removed and provide a COVID-19 test at least 5 days after the exposure at no cost to the employee. If the employee tests negative, they may return to work 7 days following exposure. If the employee tests positive, the employee must remain excluded from the workplace until the return-to-work criteria below are met. If the employee refuses a test, Mary Free Bed will keep the employee excluded for 14 days, but is not obligated to provide the medical removal protection benefits discussed below.

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

Mary Free Bed 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

Mary Free Bed 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](#)." Pursuant to CDC guidance, symptomatic employees may return to work after all the following are true:

- At least 10 days have passed since symptoms first appeared, and
- At least 24 hours have passed with no fever without fever-reducing medication, and
- Other symptoms of COVID-19 are improving (loss of taste and smell may persist for weeks or months and need not delay the end of isolation).

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

Pursuant to CDC guidance, asymptomatic employees may return to work after at least 10 days have passed since a positive COVID-19 test. If an employer receives guidance from a healthcare provider that the employee may not return to work, they must follow that guidance.

Medical Removal Protection Benefits

MaryFree Bed 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, MaryFree Bed will follow the appropriate policies below utilizing EII, MPLMA, or normal sick time procedures, and intends to be compliant under the OSHA COVID-19 Emergency Temporary Standard

- [HR.002 Attendance](#)
- [HR.021 Employee Health Program](#)
- [HR.029 Extended Illness Insurance \(EII\)](#)
- [HR.030 FMLA](#)
- [HR.049 Paid Time Off \(PTO\)](#)

Vaccination

MaryFree Bed encourages employees to receive the COVID-19 vaccination as a part of a multi-layered infection control approach. MaryFree Bed 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. MaryFree Bed will follow the appropriate policies below utilizing PTO, EII, MPMLA, or normal sick time procedures, and intends to be compliant under the OSHA COVID-19 Emergency Temporary Standard.

Training

MaryFree Bed 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. MaryFree Bed 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.

MaryFree Bed's COVID-19 training program will be accessible in the following ways:

- New Employee Orientation
- Online Learning modules on the MaryFree Bed Education Academy
- Department specific training in huddles and staff meetings
- ICC Communications

MaryFree Bed 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;
- Mary Free Bed'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;
- Mary Free Bed'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;
- Mary Free Bed'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 Mary Free Bed'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.

Mary Free Bed 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.

Mary Free Bed 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

Mary Free Bed 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.

Mary Free Bed 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

Mary Free Bed 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

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

Mary Free Bed 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.

Mary Free Bed will record the information on the COVID-19 log within 24 hours of learning that the employee is COVID-19 positive. Mary Free Bed 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.

Mary Free Bed 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, Mary Free Bed 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

Mary Free Bed will report to OSHA:

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

4. Monitoring Effectiveness

Mary Free Bed 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 so as to ensure ongoing progress and efficacy.

Mary Free Bed will update this COVID-19 plan as needed to address changes in workplace-specific COVID-19 hazards and exposures.

5. Coordination with Other Employers

Mary Free Bed 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.

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

Other Worksite Employers	
Employer Name / Employer Representative:	Contact Information:
Mercy Health Saint Mary's	616-685-6500
Orthopedic Association of Michigan (OAM)	616-459-1309
HDVCH Feeding Clinic	616-840-8050

6. **Entering Residences**

Mary Free Bed 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). Mary Free Bed requires that COVID-19 protocols be communicated to homeowners and sole proprietors prior to conducting work activities at private residences or other physical locations not covered by the OSH Act.

7. **Signature and Plan Availability**

Mary Free Bed has prepared and issued this COVID-19 plan on 7/21/2021.

Employer Name:	Mary Free Bed Rehabilitation Hospital
Address:	350 Lafayette Ave SE, Grand Rapids, MI 49503

This COVID-19 plan is available:

<input type="checkbox"/> Via hard copy in the MFB Main Campus Security Office	<input type="checkbox"/> Posted to Mary Free Bed Sharepoint	<input type="checkbox"/> Available by request to Brad Estep. Bradley.estep@maryfreebed.com .
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Health Evaluation Questionnaire Updated: 01.22.21

Question	Patients/Visitors	Staff
1. Have you had close contact with someone who is suspected of or has tested positive for COVID-19 in the past 14 days WITHOUT wearing PPE?	Yes- You will not be able to come to come into the facility, please reach out to scheduling to reschedule your appointment. No- Go to Question 4	Yes- You may work but need to monitor temperature for the next 14 days. Give temperature log and go to Question 2. No- Go to Questions 2
2. Have you had a vaccination for COVID-19 in the last three days?		Yes- Go to Question 3 No- Go to Question 4
3. Do you feel well enough to work and do not have a fever greater than 100 degrees Fahrenheit?		Yes- You may work. No- You will not be able to work today. Please contact your manager, following your departments normal call-in procedures
4. Do you have ANY of the following symptoms that have started or gotten worse in the past 48 hours: <ol style="list-style-type: none"> Fever >100 Cough or shortness of breath Loss of taste or smell Vomiting 	Yes- You will not be able to come to come into the facility, please reach out to scheduling to reschedule your appointment. No- Go to Question 5	Yes- You will not be able to work today. Please contact your manager, following your departments normal call-in procedures No- Go to question 5
5. Do you have two or more of the following symptoms that are NEW or have worsened in the past 48 hours? <ol style="list-style-type: none"> Chills, muscle pain, headache, sore throat, diarrhea, congestion/runny nose, fatigue or nausea 	Yes- You will not be able to come to come into the facility, please reach out to scheduling to reschedule your appointment. No- You may enter the facility.	Yes- You will not be able to work today. Please contact your manager, following your departments normal call-in procedures No- You may enter the facility.

Appendix B

(Insert Hazard Assessment)