

Valley Medical Group COVID-19 Plan

1. Purpose and Scope

Valley Medical Group (VMG) is committed to providing a safe and healthy workplace for all our employees. VMG 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).

VMG 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 Location	Worksite-Specific COVID-19 Considerations
Ambulatory Surgical Center Amherst Medical Center 31 Hall Drive Amherst MA	Aerolizing procedures

2. Roles and Responsibilities

VMG'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 Coordinators, listed below, implement and monitor this COVID-19 plan. The COVID-19 Safety Coordinators have full support of the VMG Senior Leadership in implementing and monitoring this COVID-19 plan, and has authority to ensure compliance with all aspects of this plan.

The COVID-19 Safety Coordinators 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.

VMG encourages all employees to provide information, feedback and suggestions, as well as ask questions and report concerns regarding this COVID-19 Plan. Employees may contact their manager or supervisor, the COVID-19 Safety Coordinators, or utilize the covidquestions@vmgma.com email to submit a question, concern or suggestion. The COVID-19 Safety Coordinators will review, recommend and implement changes as appropriate to the COVID-19 plan utilizing all data sources available including feedback and information from employees. Updates to the COVID-19 Safety plan will be sent out to all employees via Email, and also posted on the company Intranet page.

COVID-19 Safety Coordinator(s)		
Name	Title/Facility Location	Contact Information (phone, email address)
Amy Rice BSN, MSHA, RN	Quality Director/Greenfield Health Center	413-772-3303 amyrice@vmgma.com
Gina Campbell MSN, RN	Vice President of Clinical Operations/Greenfield Health Center	413-772-3388 gcampbell@vmgma.com

3. Hazard Assessment and Worker Protections

VMG 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).

VMG has identified the following well-defined areas of the workplace where **fully vaccinated employees** may be exempted 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. VMG reserves the right to allow and restrict such exemptions based on the local/state/national positivity rates. The designated areas that may be exempted are:

- Administrative offices
- Conference rooms
- Employee Lunchrooms located outside of clinical areas

VMG has adopted a policy that all employees will be vaccinated for COVID-19 by October 1st, 2021, with exemptions granted for religious and medical reasons. See Covid 19 Immunization policy.

VMG and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to conduct the workplace-specific hazard assessment. VMG will use OSHA's COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis to assess hazards related to COVID-19 at each facility and develop and implement policies and procedures for worker protection. 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.

VMG 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:

Patient Screening and Management

All VMG sites provide direct patient care, necessitating the need to:

- Limit and monitor points of entry to the buildings;
- Screen and triage all patients, delivery people, visitors, and other non-employees entering the buildings for symptoms of COVID-19;
- Implement other applicable patient management strategies in accordance with the Massachusetts COVID 19 Regulations and Guidance and CDC's "COVID-19 Infection Prevention and Control Recommendations"; and
- Continue to offer Telehealth options for patient care when appropriate

See Access control policy and procedure for the plans for specific information detailing VMG procedures for limiting and monitoring points of entry to the buildings, screening and triaging for symptoms of COVID-19, and restricting facility access to reduce crowding.

Standard and Transmission-Based Precautions

VMG will develop and implement policies and procedures to adhere to Standard and Transmission-Based Precautions in accordance with CDC's "Guidelines for Isolation Precautions."

VMG 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.

VMG has existing policies and procedures in place to maintain infection control. In addition, several policies were developed specific to deterring the exposure and transmission of COVID 19. See the following policies and procedures:

- Infection control
- Handwashing
- Access Control
- Environmental Cleaning
- Exam Room Cleaning
- Respiratory Area Cleaning Procedure
- Fit Testing
- Elastomeric Mask and Filter Care and Cleaning
- Personal Protective Equipment by Work Area
- Personal Protective Equipment ASPC
- Mandatory Safety Standards for Work places
- Criteria for Decision to Recommend Isolation/Quarantine for COVID-19 Exposure or Symptoms and Return to Work/School for Staff, Patients, Students
- Covid 19 Immunization Policy

Personal Protective Equipment (PPE)

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

Please see the Personal Protective Equipment by work area policy and procedure.

The following are additional exceptions to VMG'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, VMG 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, VMG will ensure that any such employee wears a face shield, if their condition or disability permits it. VMG will provide accommodations for religious beliefs consistent with Title VII of the Civil Rights Act.

6. When VMG 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). Currently no job tasks, have been identified that the use of a facemask presents a hazard of serious injury or death. When/if this is the case, VMG 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 VMG otherwise requires use of a face shield, VMG will ensure that face shields are cleaned at least daily and are not damaged.

VMG will not prevent any employee from voluntarily wearing their own facemask and/or face shield in situations when they are not required.

In addition to providing, and ensuring employees wear, facemasks, VMG 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 employees with exposure to people with suspected or confirmed COVID-19, VMG will provide respirators and other PPE, including gloves, an isolation gown or protective clothing, and eye protection. VMG 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, VMG will provide a respirator to each employee and ensure it is used in accordance with the OSHA Respiratory Protection standard (29 CFR 1910.134). VMG 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).

Please see the Personal Protective Equipment by work area policy and procedure.

VMG 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.

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, VMG 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.

VMG 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

VMG 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, VMG 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.

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

The following strategies have been implemented to assist with physical distancing protocols:

- Staff who are able working from home
- On site staff utilizing vacant office space of those working from home
- Floor markings designating 6 ft distance in areas that develop queues or lines
- Appropriately spaced chairs in waiting rooms
- Maximum occupancy levels posted
- Meetings conducted via online platforms such as Zoom, Go to Meeting
- Maximum occupancy for in person meetings will be determined and revised based on positivity rates and COVID cases at the local, county, state and national level.
- Offering Telehealth visits
- Staggering shifts or staffing between on site and work from home.
- Providing care outside when feasible
- Determining a flowpath for patients to follow during high volume services such as immunization clinics to maintain physical distancing

Physical Barriers

VMG has installed 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.

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

Where feasible, VMG will ensure that:

- Physical barriers are solid and made from impermeable materials;
- Physical barriers are easily cleanable;
- 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 have been installed in the following locations and are mounted securely to hard surfaces such as the countertops, desks or walls:

- Public facing fixed workstations such as Reception windows and counters and Healthcare Greeter desks
- Office space with multiple employees in workstations or desks that are not separated by at least 6 ft of space.
- Clinical work stations that have multiple staff sitting in close proximity that are not 6 feet apart.

Cleaning and Disinfection

VMG has implemented 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. VMG 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, and for medical devices and equipment:

VMG 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:

VMG 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, VMG 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).

VMG will provide alcohol-based hand rub that is at least 60% alcohol or provide readily accessible hand washing facilities. In addition, all persons entering the building will be instructed to utilize hand sanitizer. Hand sanitizer dispensers will be prominently located throughout the buildings.

Please see Environmental Cleaning, Exam Room Cleaning, Respiratory Area Cleaning Procedure, Mandatory Safety Standards for the Workplace, and Hand Hygiene policy and procedures.

Ventilation

VMG has implemented 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 were implemented, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach. VMG 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.

Other measures that VMG has implemented to assist with maximizing air ventilation include:

- Running the HVAC system for at least 2 hours before and after the building is occupied;
- Using portable high-efficiency particulate air (HEPA) fan/filtration systems;
- Using timers to sufficiently air out rooms between patients to ensure that the air has turned over sufficiently prior to using room again.

The following individual 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.

Name/Contact Information:

Jim Wood, Facilities Manager 413-775-4616

Location:

All Locations

Health Screening and Medical Management

Health Screening

VMG will require each employee to perform self screening each work day and each shift. Staff and providers will be required to attest each day that they have prescreened and appropriate to be on site. Surgical Masks will be available at the prescreening/timeclock stations with the expectation that each staff will take a new mask each day. Copies of any prescreening attestation logs used by some staff/departments will be retained for one month by the Health Center Manager.

Employee Notification to Employer of COVID-19 Illness or Symptoms

VMG will require employees to promptly notify their supervisor or COVID-19 Safety Coordinator 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 report symptoms to their manager. Employees will be dismissed from work if they are sick. The manager reports absence or illness to HR; time and attendance is tracked and Guidelines for Decision to Recommend Isolation/Quarantine for COVID-19 Exposure or Symptoms and Return to Work are followed until employee is cleared to return to work

VMG follows federal and state mandated laws that require Massachusetts employers to provide emergency paid sick leave to their employees. The new paid leave time as a result of Covid-19 is provided in addition to VMG's PTO policy

(for vacation, sick or personal time). In addition, VMG implements Paid Family Medical Leave (PFML) for serious medical conditions that are certified by a medical provider should an employee be required to take a leave of absence due to a serious health condition, or to care for a family member with a serious health condition.

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

VMG 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 VMG 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, VMG 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.

VMG has a designated manager who will track all suspected/confirmed COVID cases. This manager will provide notification to the employees via an email. This email will also be sent to the direct supervisor/manager of affected employees, the COVID 19 Safety Coordinators, and Human Resources Manager.

Medical Removal from the Workplace

VMG has also implemented a policy for removing employees from the workplace in certain circumstances. VMG 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, VMG 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, VMG will keep

them removed until they meet the return-to-work criteria discussed below or provide a negative COVID-19 polymerase chain reaction (PCR) test. 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, VMG will continue to keep the employee removed from the workplace, but is not obligated to provide the medical removal protection benefits discussed below (Note: absent undue hardship, employers must make reasonable accommodations for employees who cannot take the test for religious or disability-related medical reasons, consistent with applicable non-discrimination laws).

If VMG 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, VMG 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.

VMG 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, VMG will keep the employee excluded for 14 days, but is not obligated to provide the medical removal protection benefits discussed below (Note: absent undue hardship, employers must make reasonable accommodations for employees who cannot take the test for religious or disability-related medical reasons, consistent with applicable non-discrimination laws).

Any time an employee must be removed from the workplace, VMG 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, VMG will continue to pay that employee the same regular pay and benefits the employee would have received had the employee not been absent.

VMG 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

VMG 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, VMG 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.

See policy Criteria for Decision to Recommend Isolation/Quarantine for COVID-19 Exposure or Symptoms and Return to Work/School for Staff, Patients, Students.

Medical Removal Protection Benefits

VMG 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, VMG will continue to provide benefits to which the employee is normally entitled to. VMG follows the federal or state mandated emergency sick leave laws, or may follow normal worker's comp related criteria should the exposure or reaction from a vaccine be a result of a work related incident.

Vaccination

VMG requires employees to receive the COVID-19 vaccination as a part of a multi-layered infection control approach. VMG will support COVID-19 vaccination for each employee. Employees are encouraged to schedule their vaccinations at a time that is least disruptive to their designated work schedules, such as early or later in the day. Employees are compensated for their time away from work to schedule a vaccine appointment. Employees receive Mass Covid sick leave for time missed from work due to a post vaccine reaction, which does not interfere with their own accrued sick time. Please reference the Covid 19 Vaccination policy for specific information related to vaccination requirements and exemptions.

Training

VMG 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. VMG 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

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

- new hire general orientation
- Self study/online education
- department meetings
- discussion with supervisors

VMG 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;
- VMG'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;
- VMG'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;
- VMG'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 VMG'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.

VMG 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.

VMG 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

VMG 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.

VMG 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

VMG 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

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

VMG 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.

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

VMG 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, VMG 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

VMG will report to OSHA:

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

4. Monitoring Effectiveness

VMG 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.

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

5. Coordination with Other Employers

VMG 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.

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

VMG will provide each of the Employer Representatives listed below with a copy of the VMG COVID-19 Healthcare ETS plan. VMG Covid-19 Safety Coordinators will be responsible to maintain current copies of other employers COVID-19 Healthcare ETS plans. VMG COVID-19 Safety Coordinators will be responsible to provide copies of the VMG COVID-19 Healthcare ETS plan to other employer's representatives, when there are changes, revisions or updates.

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

Other Worksite Employers	
Employer Name / Employer Representative:	Contact Information:
Baycare Health Partners / Karen Stefanik	413-794-9191 kstefanik@baycarehealth.org
CDPHPO-/Erin Fleming	413-582-5253 Efleming9@cooleydickinson.org
Hampshire Gastroenterologists/Amanda Hurlburt	413-586-8910 AHurlburt@hampshiregi.com
Pioneer Valley Anesthesia /Dr. Jacob Schauer	860-944-0155 jschauer@cooleydickinson.org
CDMG Orthopedics and Sports Medicine/ Kierstyn Sullivan	413- 341-2201 ksullivan@COOLEYDICKINSON.ORG
Central Mass Imaging(CMI)/Dr. Rodrick Williams	978-707-9729 rodrickw1@comcast.net
Pioneer Valley Hospice and Palliative Care/ Terry Gaberson	413-774-2400 tgaberson@bhs1.org
Pioneer Hearing Services/Barbara Morris	413-773-5119 pioneerhearingservices@msn.com
New England Wound Care/Shelly Terault	413-475-3233
Walgreen's Pharmacy/ Aaron Blanchette Greenfield	413-774-5468 aaron.blanchette@walgreens.com
Walgreen's Pharmacy /Matt Mauer Florence	413-586-1190
Louise and Clark Medical Supply/ Zach Matthews	413-682-4716 zmatthews@Lcmedsupply.com
Amherst Pediatrics/Wendy Kosloski	413-253-3773 wkosloski@amherstpediatrics.net
1 st Advantage Dental/ Brittany Tibbitts	518-605-5401 Btibbon@amdpi.com

6. Entering Residences

VMG does not provide in home services and therefor is not applicable to our practice.

7. Signature and Plan Availability

VMG has prepared and issued this COVID-19 plan on 8/31/2021.

Signature _____

Title _____

8/31/2021

Employer Name:	Valley Medical Group PC
Address:	329 Conway Street, Greenfield MA 01301
President:	Paul Carlan MD

This COVID-19 plan is available:

<input type="checkbox"/> Via hard copy at Health Center Manager office each Health Center	<input type="checkbox"/> Posted to VMG intranet page	<input type="checkbox"/> Available by request. Submit requests to: Covidquestions@vmgma.com or contact COVID-19 Safety Coordinators.
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