



COVID-19 Preparedness & Response Plan

REVISED 05/24/2021

✔ General

The following COVID-19 preparedness & response plan has been established for STARS in accordance with MIOSHA Emergency Rules for Coronavirus disease 2019 (COVID-19). The purpose of this plan is to minimize or eliminate employee exposure to SARS-CoV-2.

The Emergency Rules have general safeguards applicable for all workplaces and specific safeguards for certain industries. The STARS Compliance Officer and Senior Director of Clinical Services have read these rules carefully, developed the safeguards appropriate to STARS, and has incorporated those safeguards into this plan.

STARS has designated one or more worksites supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The worksite supervisor for the Evergreen office is Heather Mills. (Alternates: Tanya Holben, Mary Ann Van Kuiken.) A worksite supervisor will remain on-site when employees are present.

The plan will be made readily available to our employees and their representatives via SharePoint.

✔ Engineering Controls

STARS has implemented feasible engineering controls to minimize or eliminate employee exposure to SARS-CoV-2. Engineering controls involve isolating employees from work-related hazards using ventilation and other engineered solutions. In workplaces where they are appropriate, these types of controls reduce exposure to hazards without relying on worker behavior and can be the most cost-effective solution to implement.

Todd DeBoer, PMO Manager / Facilities Manager, will be responsible for seeing that the correct engineering controls are chosen, installed, maintained for effectiveness, and serviced when necessary. The following engineering controls have been implemented:

1. Increased the percentage of outdoor air in the HVAC system.

2. Increased air filtration to as high as possible without significantly diminishing design airflow.
3. Inspected filter housing and racks to ensure appropriate filter fit and check for ways to minimize filter bypass.
4. Ensured exhaust fans in restroom facilities are functional and operating at full capacity when the building is occupied.
5. Installed ultraviolet germicidal irradiation (UVGI) system in the 2nd floor reading room area as a supplement to help inactivate the virus.
6. Installed a bipolar ionization system in the rest of the Evergreen building as a supplement to help inactivate the virus.

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. STARS will be responsible for seeing that the correct administrative controls are chosen, implemented and maintained for effectiveness. The following administrative controls have been established for STARS:

Job/Task	Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)
Employees not fully vaccinated	Maintain at least six feet from everyone on the worksite.
All employees & visitors	Promote remote work (telecommuting).
All employees	Provide non-medical grade face coverings.
Employees not fully vaccinated	Require employees, except fully vaccinated persons, to wear non-medical grade face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.
All employees	Post signs in the work area reminding employees that are not fully vaccinated to wear face coverings and maintain appropriate distancing.
All visitors	Require visitors to wear non-medical grade face coverings.
All visitors	Keep visitors informed about symptoms of COVID-19 and ask sick customers to stay at home until healthy again.
All visitors	Provide visitors with tissues and trash receptacles.
All employees & visitors	Encourage proper cough and sneeze etiquette by employees, including covering coughs and sneezes and

	coughing and sneezing in one's elbows rather than hands.
All employees	Ensure that sick leave policies are flexible and consistent with public health guidance, so employees do not go to work sick.
All employees	Do not require a healthcare provider's note for employees who are sick with acute respiratory illness to validate their illness.
All employees	Maintain flexible policies that permit employees to stay home to care for a sick family member.

✔ Hand Hygiene

Handwashing facilities are available in the workplace and regular handwashing is required. STARS also provides employees and visitors with antiseptic hand sanitizers or towelettes containing at least 60 percent alcohol. STARS will provide time for employees to wash hands frequently and to use hand sanitizer.

✔ Disinfection of Environmental Surfaces

Todd DeBoer, PMO Manager / Facilities Manager will be responsible for seeing that environmental surfaces in the workplace are cleaned and disinfected at least daily when no people with confirmed or suspected cases of COVID -19 have been in the space. If there has been a sick person or someone who tested positive for COVID-19 in the facility within the last 24 hours, the spaces that person occupied must be cleaned and disinfected. Products with EPA-approved emerging viral pathogens claims are expected to be effective against SARS-CoV-2 based on data for harder to kill viruses. The manufacturer's instructions for use of all cleaning and disinfection products will be strictly adhered to.

✔ Personal Protective Equipment (PPE)

NOTE: Non-medical grade face coverings are technically not considered PPE. When the engineering or administrative measures described above cannot be implemented or do not protect workers fully, STARS may require employees to use PPE to supplement other controls. STARS will determine what PPE is necessary, and PPE, will be provided to workers at no cost.

✔ Health Surveillance

STARS will conduct a daily entry self-screening protocol for all employees or contractors entering the workplace, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19. Erin TePastte, the Compliance Officer will be responsible for ensuring that all required health surveillance provisions are performed.

As workers enter the place of employment at the start of each work shift STARS will have employees self-screen for COVID-19 using the MI Symptoms tool.

Employees have been directed to promptly report any signs and symptoms of COVID-19 to Abby Hegstrand, Senior Director of Clinical Services before and during the work shift. STARS has provided employees with instructions for how to make such a report to the employer.

The specific instructions for employee reporting signs and symptoms of COVID-19 are as follows:

For On-Site or Occasional On-Site STARS Employees
1. Employees who have symptoms (i.e., fever, cough, or shortness of breath) should first notify their supervisor and go home immediately and/or stay home.
2. STARS employees who, <i>whether routinely or occasionally</i> , conduct STARS business at Evergreen, BARS, hospitals, or any other location outside of their home must <u>immediately notify</u> STARS if: <ol style="list-style-type: none"> 1. The employee has developed symptoms of a respiratory infection; or 2. The employee has been in contact with any person with symptomatic laboratory-confirmed COVID-19; or 3. The employee self discovers a potential exposure no matter where the exposure occurred. Notification from employees to STARS for these purposes shall be by emailing Abby Hegstrand, Senior Director of Clinical Services at ahegstrand@starsadmin.com .
3. Employees will receive a list of assessment questions from Abby regarding exposure and/or symptoms.
4. This data may be shared with the CEO, Human Resources, and the Legal Officer/Compliance Officer for the limited purpose of determination of risk and exposure levels based on current CDC guidelines, and employee management (i.e. whether and when the employee may work or return to work).
5. STARS Human Resources will inform the employee of whether the employee may work. A return to work plan will be determined as soon as practicable. Return to work may require a fitness-for-duty or return-to-work certification from a physician, or an employee self-certification of symptoms.

100% Work From Home STARS Employees

1. Employees with symptoms (i.e., fever, cough, or shortness of breath) should not leave home for STARS work-related purposes.
2. STARS employees who conducted STARS business at Evergreen, BARS, hospitals, or any other location outside of their home during the last fourteen (14) days must immediately notify STARS if the employee has developed **symptoms** of a respiratory infection or has laboratory-confirmed COVID-19. Notification from employees to STARS for these purposes shall be by emailing Abby Hegstrand, Senior Director of Clinical Services at ahegstrand@starsadmin.com.
3. Employees will receive a list of assessment questions from Abby Hegstrand.
4. This data may be shared with the CEO, Human Resources, and the Legal Officer/Compliance Officer for the limited purpose of determination of risk and exposure levels based on current CDC guidelines, and employee management (i.e. return to work and notification of potential exposure to co-workers).

STARS will physically isolate any employees with known or suspected COVID-19 from the remainder of the workforce, using measures such as, but are not limited to:

- Not allowing known or suspected cases to report to or remain at their work location.
- Sending known or suspected cases to a location (for example, home) where they are self-isolating during their illness.
- Assigning known or suspected cases to work alone at the location where they are self-isolating during their illness.

STARS will not discharge, discipline, or otherwise retaliate against employees who stay at home or who leave work when they are at particular risk of infecting others with COVID-19.

Should STARS learn of an employee, visitor, or customer with a known case of COVID-19, (name or job title) shall, within 24 hours, notify any co-workers, contractors, or suppliers who may have come into contact with the person with a known case of COVID-19.

STARS will allow employees with a confirmed or suspected case of COVID-19 to return to the workplace only after they are no longer infectious according to the latest guidelines from the CDC.

 **Training**

STARS will train workers on, at a minimum:

- Workplace infection-control practices.
- The proper use of personal protective equipment.
- Steps the employee must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
- How to report unsafe working conditions.

Erin TePastte, Compliance Officer, shall create a record of the training. Records should include the name of the employee(s) trained and the date of the training.

Recordkeeping

STARS will maintain records of the following requirements:

- Training. The employer shall maintain a record of all COVID-19 employee training.
- Screening protocols. The employer shall maintain a record of screening for each employee or visitor entering the workplace.
- Proof of vaccination. The employer will maintain proof of vaccination for all employees that email sufficient proof of vaccination to: vaccine@starsadmin.com.
- When an employee who works on-site at Evergreen is identified with a confirmed case of COVID-19, record any co-workers, contractors, or suppliers who may have come into contact with the person who was the confirmed case of COVID-19.

Erin TePastte, Compliance Officer, and Abby Hegstrand, Senior Director of Clinical Services will ensure that the records are kept.

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