

115 Scranton Avenue Falmouth, MA 02540 Tel: (508) 548-1977 Fax: (508) 457-7573 TDD 1-866-545-1833, Ext. 185 www.falmouthhousing.org

# **INFECTIOUS DISEASES/ COVID-19 POLICY**

## **Purpose**

The Falmouth Housing Authority is an essential business because it provides shelter to vulnerable populations. As such, the housing authority recognizes that infectious disease outbreaks, such as COVID- 19, require that procedures be put into place to increase safety precautions by implementing strategies for staff and tenants to limit exposure to and the spread of disease(s).

## **Definition**

**Infectious Disease**: Per the Mayo Clinic, infectious diseases are disorders caused by organisms - such as bacteria, viruses, fungi or parasites. Many organisms live in and on [the body]. They are normally harmless or even helpful. But under certain conditions, some organisms may cause disease. Some infectious diseases can be passed from person to person ... Each infectious disease has its own specific sign and symptoms. General signs and symptoms common to a number of infectious diseases include fever, diarrhea, fatigue, muscle aches and coughing.

**COVID-19**: Per the Centers for Disease Control (CDC), Coronavirus disease 2019 (COVID-19) is a respiratory illness that can spread from person to person. Data suggests that symptoms may appear in as few as 2 days or as long as 14 days after exposure to the virus that causes COVID-19. Symptoms can include fever, cough, difficulty breathing, and shortness of breath.

The virus causing COVID-19 is called SARS-CoV-2. It is thought to spread mainly from personto- person via respiratory droplets among close contacts. Respiratory droplets are produced when an infected person coughs, sneezes, or talks and can land in the mouths or noses, or possibly be inhaled into the lungs, of people who are nearby.

Close contact may include:

- Being within approximately six feet of an individual with COVID-19 for a prolonged period of time a cumulative period of 15 minutes in a 24-hour period. The 15 minutes is not measured consecutively.
- Having direct contact with body fluids (such as blood, phlegm, and respiratory droplets) from an individual with COVID-19.

Recent studies indicate that people who are infected but do not have symptoms likely also play a role in the spread of COVID-19.

# Workers should quarantine if they have been exposed to COVID-19, which means:

- They were within <u>six feet of someone who has COVID-19</u> for a total of 15 minutes or more within a 24-hour period, starting from two days before illness onset (or, for asymptomatic patients, two days prior to test specimen collection) until the time the patient is isolated, or
- They provided care at home to someone who is sick with COVID-19, or
- They had direct physical contact with a person who has COVID-19 (for example hugged or kissed them), or
- They shared eating or drinking utensils with a person who has COVID-19, or
- Someone who has COVID-19 sneezed, coughed, or somehow got respiratory droplets on them.

An employee will not be required to self-quarantine if they have been exposed to COVID-19 and are fully vaccinated or have had COVID-19 within the last 3 months, unless the employee does not develop new symptoms or required by current state guidelines.

Local public health authorities determine and establish the quarantine options for their jurisdictions. <u>CDC guidance provides</u> that individuals who have been exposed should:

- Stay home for 10 days after last contact with a person who has COVID-19 (or may be shortened to 7 days if the employee receives a negative test result on day 5 or later),
- Watch for fever (100°F), cough, shortness of breath, or other symptoms of COVID-19, and
- To the extent possible, stay away from others, especially people who are at higher risk for getting very sick from COVID-19.

CDC also recognizes that local public health departments may consider other options for ending quarantine; for example, end quarantine after day 10 without testing, or after day seven after receiving a negative test result (test must occur on day five or later). Therefore, these individuals should:

- Continuously watch for symptoms after exposure;
- Immediately self-isolate and contact the local public health authority or their healthcare providers if symptoms appear; and
- Wear a face covering, stay at least six feet from others, wash hands, avoid crowds, and take other steps to prevent the spread of COVID-19.
- An employee will not be required to self-quarantine if they have been exposed to COVID-19 and are fully vaccinated within the last 3 months, unless required by current state guidelines. People who have tested positive for COVID-19 within the past 3 months

and recovered do not have to quarantine or get tested again as long as they do not develop new symptoms.

The Housing shall adhere to CDC guidance unless the Commonwealth of Massachusetts issues any law or order that runs contrary to CDC guidance, in which case, the Housing Authority shall adhere to Massachusetts laws and orders where they conflict.

## **Returning to Work after Illness or Exposure**

The Housing Authority follows CDC guidance for discontinuing self-isolation and returning to work after illness, or discontinuing self-quarantine and monitoring after exposure, as appropriate for the workplace.

It is a best practice to ensure workers who have been exposed to someone with COVID-19 routinely monitor themselves or receive monitoring, including for signs and/or symptoms of potential illness, at work, in accordance with CDC guidance.

If an employee wishes to return to the workplace before the end of a full quarantine, the Falmouth Housing Authority has the right to require a negative PCR test result prior to allowing an employee back into the physical workplace after being exposed to and being classified as a close contact or having COVID-19, in accordance with current CDC guidelines.

# **Positive Test Result**

If an employee tests positive for COVID-19, information on benefits and workplace exclusion of COVID-19 cases will be provided to them. We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with current OSHA and CDC guidelines.

An employee with COVID-19 symptoms must quarantine after a positive test result and cannot return to work until:

- 10 days since symptoms first appeared; and
- At least 24 hours with no fever without fever-reducing medication; and
- Other symptoms of COVID-19 are improving.

An employee who remained asymptomatic must quarantine after a positive test result and cannot return to work until 10 days have passed since the date of their first positive test result.

If an order to isolate or quarantine an employee is issued by a local or state health official, the employee will not return to work until the period of isolation or quarantine is completed or the order is lifted. If no period was specified, then the period will be 10 days from the time the order to isolate was effective or 10 days from the time the order to quarantine was effective.

## **Negative Test Result**

A negative result only means that the COVID-19 virus is not currently detectible or present in the employee's system, and the employee will need to continue to follow our safety measures to reduce transmission in the workplace. If an employee has had exposure to COVID-19 as a close contact, the employee may pursue the option of reducing the quarantine period to 7 days if the employee receives a negative COVID-19 test on day 5 or later of quarantine.

# **Vaccination**

Getting the COVID-19 vaccine gives you an added layer of protection against COVID-19 and could also protect your coworkers and family. Stopping a pandemic requires using all the tools we have available – wearing masks, staying at least 6 feet from people, avoiding crowds and poorly ventilated spaces, washing your hands frequently, and getting vaccinated.

We anticipate that our employees will be eligible for vaccination during Phase 3 of the Massachusetts Vaccination Plan. When the Company has information on appointment availability for that phase, the Company will provide notices on how to set up vaccination appointments at the local vaccination sites. Getting vaccinated adds one more layer of protection for you, your coworkers, your family, and loved ones. We are encouraging our employees to be vaccinated by allowing employees to schedule the vaccination appointments during working hours, and you will be paid for up to four (4) hours to attend vaccination appointments for each of separate scheduled vaccinations. In order to receive paid time off, you may be required to show proof of COVID-19 vaccination following these appointments to Human Resources.

# Current COVID-19 Exposure or Illness

Individuals with current COVID-19 infection will have vaccination should defer receiving the vaccination until recovery from acute illness and the criteria has been met to discontinue isolation. Individuals who have a current known COVID-19 exposure should defer vaccination until their quarantine period has ended to avoid exposing others during the vaccination visit. Employees should report COVID-19 symptoms, exposures and hazards to Human Resources within 24 hours of becoming aware of the potential symptoms, exposures or hazards. No employee will be subject to any form of reprisal in reporting symptoms, exposures or hazards.

# Confidentiality

The Company will maintain the confidentiality of all health-related information collected from the COVID-19 vaccinations, tests, and symptom monitoring in accordance with the HIPAA and ADA requirements on medical record confidentiality. All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 vaccinations or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

## Public Health Recommendations for Vaccinated Persons

Protection from the vaccine is not immediate; the vaccine is a 2-dose series in most cases, and it will take between one to two weeks following the second dosage to be considered fully vaccinated. Vaccinated employees will still be required to follow current guidance to protect themselves and others in the workplace including:

- Wearing a face mask;
- Staying at least six feet away from others;
- Avoiding crowds;
- Washing hands often;
- Following state and CDC travel guidance; and
- Following quarantine guidance after an exposure to someone with COVID-19. An employee will not be required to self-quarantine if they have had been exposed to COVID-19 and are fully vaccinated within the last 3 months, unless required by current state guidelines.

#### Safety of the Vaccine

It is the U.S. vaccine safety system's job to make sure that all vaccines are as safe as possible. Safety has been a top priority while federal partners have worked to make COVID-19 vaccines available for use in the United States. The new COVID-19 vaccines have been evaluated in tens of thousands of individuals, who volunteered to be vaccinated and to participate in clinical trials. The information from these clinical trials allowed the U.S. Food and Drug Administration (FDA) to determine the safety and effectiveness of the vaccines. These clinical trials were conducted according to rigorous standards set forth by the FDA, who have determined that the newly authorized COVID-19 vaccines meet its safety and effectiveness standards. Therefore, the FDA has made these vaccines available for use in the United States under what is known as an Emergency Use Authorization.

The CDC has developed a new tool, <u>v-safe</u>, to help us quickly find any safety issues with COVID-19 vaccines. V-safe is a smartphone-based, after-vaccination health checker for people who receive COVID-19 vaccines.

## Symptomatic After Vaccination

A small percentage of individuals may experience side effects after being vaccinated against COVID-19 during the three days following COVID-19 vaccine administration. Employees will be able to continue to work at the physical workplace post vaccination so long as during the three days after vaccination the employee does not experience the following symptoms:

- Fever over 101° Fahrenheit;
- Severe headache;
- Severe fatigue characterized by a sense of exhaustion;
- Severe muscle aches;
- Severe joint pain; or
- Any other symptom consistent with COVID-19.

If an employee does experience any of the above-mentioned symptoms, the employee will be required to quarantine from work for those three days and be advised to seek medical attention. If after three days have passed since vaccination and the employee is still experiencing COVID-19 symptoms, the employee will be required to continue quarantining pending COVID-19 test results, consistent with current CDC guidelines.

## Preventive Measures After Vaccination

While the vaccine works with your immune system so your body will be ready to fight the virus if you are exposed, you will also need to continue other preventive measures such as social distancing and wearing masks to reduce the chance of being exposed to the virus and spreading it to others.

# Need for Reasonable Accommodation

If any employee requires a reasonable accommodation from this testing requirement due to a disability or sincerely held religious belief, please contact Human Resources to start the interactive process.

Government means federal, state, or local Town governing bodies

# **Policy**

The Executive Director or their assigned designee will declare the Falmouth Housing Authority to be either fully closed or closed to the public should the government declare an outbreak with stay-at-home orders. Fully closed means that the building will not be open to staff or the public; non-essential staff will be offered the opportunity to use all accrued benefit hours (i.e., vacation, sick, personal, comp). Essential staff will work (remotely or in-house based on government order or best practice guidance) to perform the urgent and necessary functions to maintain the program integrity of the housing authority.

Closed to the public means that administrative office remains open for staff to work but the building will be closed to the general public. All regular functions of the housing authority will continue to be performed through measures ensuring no personal contact with the general public.

During all periods of closure, communication with the public will be conducted via telephone, mail, drop box, email, facsimile and vi1tual technology, if available. Communications with tenants of the housing authority will be conducted via the posting of flyers, direct mail, and telephone (person-to-person, automated) calls.

In all cases, the housing authority will remain closed for the briefest period of time possible in accordance with the government recommendations.

The Falmouth Housing Authority will not allow employees to come to work if they declare that they have been determined to have the virus as described by the outbreak notices issued by the government and/or have been exposed to someone that is showing any symptoms of the virus related to the outbreak.

Employees entitled to make use of Families First Coronavirus Response Act benefits shall provide proof of documentation in support of said leave through March 31, 2021. In addition, employees entitled to exercise their rights under FFCR sick leave must be cleared by a physician to return to work. If an employee is not eligible for FFCRA, has used all FFCRA leave entitlement, the employee will be required to use any vacation or sick leave for necessary absences prior to taking the leave unpaid. If an employee is able to work remotely, the employee will be asked to do so in lieu of taking leave.

The Falmouth Housing Authority will communicate with the local Board of Health and/or appropriate town and state official(s) to determine whether or not the site of the confirmed cases may be released. This will be done so that those residing at the site and staff will be aware of the affected location and notification, if deemed appropriate, to the tenants will be made. The Falmouth Housing Authority will not release the identity of an infected employee or resident in compliance with the medical confidentiality requirements of the Americans with Disabilities Act, unless a valid exception applies.

The Falmouth Housing Authority will modify its regular processes as follows, based on guidance provided by the government or, in the absence of such guidance decisions will be based upon best practices:

- 1. Work with essential staff to determine which processes, if any, may be done remotely (see remote work policy) and securely to ensure protection of data and systems.
  - a. Essential staff are:
    - i. Executive Director;
    - ii. Assistant Director;
    - iii. Fiscal Officer;
    - iv. Service Coordinator;
    - v. Maintenance Foreman; and
    - vi. Maintenance Mechanic Laborer/Technicians.
  - b. Non-essential staff are:
    - i. Receptionist(s);
    - ii. Executive, Maintenance and Programs Assistant(s);
    - iii. Tenant Selector;
    - iv. State Certification Clerk; and
    - v. Housing Specialist(s).
  - c. In the event of *full office closure (meaning, the office is closed both to the public and administrative staff to pelform work in-house)*, essential staff will be required to perform the below procedures to complete urgent and necessary work to ensure the program integrity of the housing authority as follows:
    - i. Phones Calls will be answered by an answering service; emergency calls will be routed from the answering service to the maintenance department.
    - ii. Mail will be sent and delivered through the use of a mail receptable located outside of the housing authority.

- iii. Applications will be accessible for submission on line and via mail delivery.
- iv. Procurement will be performed by the Fiscal Officer.
- v. Briefings, lease ups and recertifications will be conducted through drop box, mail, telephone and virtual contact options, if available.
- vi. Rents will be processed through drop box and mail delive1y; receipts will be mailed to tenants.
- vii. Payroll, accounts receivable and accounts payable will be processed as scheduled.
- viii. Assigned staff will conduct wellness checks, provide links to community resources, provide quarantine activities by mail, online, telephone for tenants.
- d. In the event of closure to the public only, management will determine nonessential task assignments and alternatives, if necessary, to the work schedule to ensure that mandated implementations from the government and best practices are observed. Every effort will be made to maintain standard work schedules and safe work environment(s).
- 2. If traveling together during work hours and/or for the purpose of work on behalf of the Falmouth Housing Authority, all staff must wear masks when traveling in a vehicle.
- 3. Maintenance Mechanic Laborer technicians and the Foreman are essential staff. Special procedures will be observed during all closures as follows:
  - a. Unit Inspections will cease, unless there is an emergency reason to enter the unit.
  - b. Sanitizing of all common areas daily, and more frequently if staff capacity allows.
  - c. Removal of common area furniture to prevent social gathering
  - d. Perform emergency work orders only\*, wear protective gear (i.e., masks\*\*, gloves, goggles) and pre-sanitize all areas that will be touched during the unit entry, unit exit and repair area.

\*If an existing routine work order is in the system and both the staff and tenant agree that the work should be performed during the emergency work order access, the routine work order may be completed. On all work orders, prior to unit entry, the tenant must be queried as to whether or not they have been knowingly exposed to the virus and all tenants must agree to quarantine themselves (i.e., restroom, bedroom) to ensure social separation during the repair(s). If maintenance is not able to perform the emergency work order, a vendor will be contacted to perform the work order. Maintenance will be encouraged to work on outdoor projects, maintenance administrative tasks as assigned, and unit turnovers.

\*\* Falmouth Housing Authority would prefer that staff use the masks that it has on hand and provides for use by its staff, as it believes those masks provide the level of protection it wants for the staff. If staff prefer to use their own mask, it must be of an approved design. Please consult with your supervisor about the type of mask you wish to use. NOTE: Masks that bear any type of message will not be permitted unless the message falls under the protections of the NLRA. Falmouth Housing Authority does not want to offend any of the people we serve, nor does it want to risk any type of disagreement or altercation occasioned by a message on a mask.

- 4. **Public meetings** will be conducted, based on guidance provided by the State of Massachusetts, via approved platforms (i.e., virtual or teleconferencing platforms); access to the meeting will be provided on the agenda. Agendas are posted at the Town of Falmouth and sent out electronically; and on our website.
- 5. **Hardship Exemption to Falmouth Housing Authority Tenants**: The housing authority must grant an exemption from payment of minimum rent if the family is unable to pay minimum rent because of financial hardship (24 CFR 5.630 and/or applicable state regulations). The housing authority will notify all families of their right to request a minimum rent hardship exemption and advise them that hardship exemptions are subject to applicable information hearing procedures. Families will be provided with information regarding how to request an exemption, the process for exemption evaluation, and their grievance rights should an exemption request be denied. Families cannot request a hardship exemption if the family's calculated tenant portion of payment is higher than the minimum rent.

Financial hardships may include any of the following situations:

- When the family has lost eligibility for or is waiting for an eligibility determination for federal, state or local assistance program,
- When the family would be evicted as a result of the imposition of the minimum rent requirement,
- When the income of the family has decreased because of changed circumstances, including loss of employment,
- When a death has occurred in the family
- When the family has an increase in expenses because of changed circumstances, for medical costs, childcare, transportation, education or similar items.
- 6. **As-needed remote work policy**: Telecommuting arrangements would be temporary in nature, made on a case-by-case basis and will focus first on the business needs of the housing authority, and the protection of client data and software/hardware systems.
  - *Time worked*: Telecommuting employees will be required to accurately record all hours worked using the housing authority's time-keeping documentation/system. Hours worked in excess of those scheduled per day and per work week require advance approval of the telecommuter's supervisor. Failure to comply with this requirement may result in the immediate termination of the telecommuting agreement.
  - *Safety*: Telecommuting employees are expected to maintain their home work space in a safe manner, free from safety hazards. The housing authority will provide to each telecommuting employee a safety checklist that must be completed before a telework schedule is assigned. Injuries sustained by the

employee in the home office location and in conjunction their regular work duties will be covered by FHA's worker's compensation policy. Telecommuting employees are responsible for notifying the housing authority of such injuries as soon as practicable. The telecommuting employee is liable for any injuries sustained by visitors/others in their home/work space.

- *Equipment*: On a case-by-case basis, the housing authority will determine, with information supplied by the telecommuting employee and the supervisor, the appropriate equipment needs (including hardware, software, modems, phone and data lines and other office equipment) for each telecommuting arrangement. Equipment supplied by the housing authority will be maintained by the housing authority. Equipment supplied by the telecommuting employee, if deemed appropriate by the housing authority, will be maintained by the telecommuting employee; the housing authority accepts no responsibility for damage or repairs to employee-owned equipment. The housing authority reserves the right to make determinations as to appropriate equipment, subject to change at any time. Equipment supplied by the housing authority is to be used for business purposes only. The telecommuting employee must sign an inventory of all housing authority property received and agree to take appropriate action to protect the items from damage or theft. Upon termination of employment, all housing authority property will be returned to the housing authority, unless other arrangements have been made.
- *Supplies*: The housing authority will supply the telecommuting employee with appropriate office supplies (pens, paper, etc.) as deemed necessary. The housing authority will also reimburse the telecommuting employee for business-related expenses, such as phone calls and shipping costs, that are reasonably incurred in carrying out the telecommuting employee's job.
- *Workspace*: The employee will establish an appropriate work environment, within their home for, work purposes. The housing authority will not be responsible for costs associated with the setup of the telecommuting employee's home office, such as remodeling, furniture or lighting, nor for repairs or modifications to the home office space.
- Security: Consistent with housing authority's expectation of information security for employees working in the office (i.e., data, interaction with clients), telecommuting employees will be expected to ensure the protection of housing authority information brought to and/or accessed from their home work spaces. Steps include the use of locked cabinet files and desks, regular password maintenance, and any other measures appropriate for the task assignment and the work environment.

*Oversight*: All telecommuting arrangements will include frequent interaction (i.e., meetings, phone, e-mail, and/or virtual technology) between the telecommuting employee and their supervisor. An appropriate level of communication between the telecommuting employee and supervisor will be agreed to as part of the telecommuting agreement.

## Suppressing the Spread of the Hazard Using Face Coverings

Falmouth Housing Authority provides all workers with face coverings. Face coverings should be made of at least two layers of a tightly woven breathable fabric, such as cotton, and should not have exhalation valves or vents. They should fit snugly over the nose, mouth, and chin with no large gaps on the outside of the face.

Falmouth Housing Authority requires any other individuals at the workplace (e.g., visitors, clients, non-employees) to wear a face covering unless they are under the age of two or are actively consuming food or beverages onsite.

Falmouth Housing Authority requires employees, when travelling together in a single vehicle, to wear a mask during the transport period.

Some employees may need a reasonable accommodation if they are unable to wear a face covering due to a disability.

Wearing a face covering does not eliminate the need for physical distancing of at least six feet apart.

# **Hygiene Practices to Lower Hazard Exposure**

In order to prevent the spread of COVID-19 in the workplace, it is vitally important to emphasize good hygiene practices, including practices for hand hygiene, respiratory etiquette, and cleaning and disinfection.

Falmouth Housing Authority provides the following:

- Provide soap, water, and paper towels for workers, clients, and visitors to wash their hands, and encourage frequent and proper (for at least 20 seconds) handwashing.
- Provide hand sanitizer with at least 60% alcohol and encourage workers to use it frequently when they cannot readily wash their hands.
- Identify high-traffic areas, as well as surfaces or items that are shared or frequently touched, that could become contaminated. Target them for enhanced <u>cleaning and</u> <u>disinfection</u> using EPA registered disinfectants and adherence to CDC guidance for controlling the spread of COVID-19.
- Provide tissues and no-touch trash cans.
- Place posters that encourage hand hygiene and physical distancing to help stop the spread of COVID-19 at the entrance to your workplace and in other workplace areas where they are likely to be seen. This should include signs for non-English speakers, as needed.

## **Implement Social Distancing to Reduce Hazard Exposure**

Not only is social distancing either required or highly recommended in most states, OSHA also recommends including practicing for maximizing social distancing to the extent feasible and maintaining distance between all people, including workers, clients and visitors. Six feet of distance is the general rule of thumb, though social distancing practices may change as community transmission prompt communities to move through the reopening process. Falmouth Housing Authority has limited the number of people in one place any given time by implementing flexible worksites, delivering services remotely, and implementing flexible meeting and travel options.

Falmouth Housing Authority has increased physical space:

- Between workers at the workplace to at least six feet.
- Between workers and clients by adjusting business practices to reduce close contact with clients.
- By altering workspaces to help workers and clients maintain physical distancing and physically separate workers by at least six feet from each other and from clients. This includes using signs, tape marks, or other visual cues, placed six feet apart.

If a high-risk for serious illness employee has requested an accommodation, Falmouth Housing Authority has considered offering duties that minimize contact with clients and other workers.

Falmouth Housing Authority complies with local reopening guidelines on closing or limiting access to common areas where workers are likely to congregate and interact.

In cases where workers are not able to remain at least six feet away from others, Falmouth Housing Authority has installed transparent or other shields to separate workers from one another. The barriers should block face-to-face pathways between individuals in order to prevent direct transmission of respiratory droplets. The posture (sitting or standing) of users should be considered when designing and installing barriers. Where feasible, social distancing must always be maintained.

# Eliminating Hazard by Identification and Isolation of Sick Employees

Employers must identify and isolate sick employees to reduce the spread of COVID-19 in the workplace. Falmouth Housing Authority requires self-monitoring or screening of symptoms, and isolating and excluding from the workplace any employees with signs or symptoms of COVID-19.

Employees must evaluate themselves for signs/symptoms of COVID-19 before coming to work, and to stay home if they are not well.

Falmouth Housing Authority has established a protocol for managing people who become ill in the workplace, including details about how and where a sick person will be isolated (in the event they are unable to leave immediately) while awaiting transportation from the workplace, to their home or to a healthcare facility, and cleaning and disinfecting spaces the ill person has occupied to prevent exposure to other workers, clients, or visitors. Employers may need to collaborate with health officials to facilitate contact tracing and notification related to COVID-19 cases or possible exposures.

# Workers who have or likely have COVID-19 should be isolated until they meet <u>CDC</u> <u>guidelines for exiting isolation</u>:

- If you think or know you had COVID-19 and had symptoms, you can return after:
  - At least 10 days since symptoms first appeared **and**
  - At least 24 hours 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).
- Some workers might need to stay home and isolate longer than 10 days, as recommended by their healthcare providers:
  - A healthcare provider may recommend that a worker who had severe illness from COVID-19 (admitted to a hospital and needed oxygen) stay in isolation for up to 20 days after symptoms first appeared.
  - Workers who had COVID-19 or tested positive for COVID-19 **and** have a weakened immune system should consult with their healthcare providers for more information. Their doctors may work with infectious disease experts at the local health department to determine when they can be around others.

# **Improving Ventilation to Reduce Hazard**

The CDC and OSHA both have weighed in on the importance of improving ventilation to prevent the spread of COVID-19 in buildings. Falmouth Housing Authority has implemented the following to address ventilation:

- Ensure ventilation systems operate properly and provide acceptable indoor air quality for the current occupancy level for each space.
- Increase ventilation rates when possible.
- When weather conditions allow, increase fresh outdoor air by opening windows and doors. Do not open windows and doors if doing so poses a safety or health risk (e.g., risk of falling, triggering asthma symptoms) to occupants in the building.
- Use fans to increase the effectiveness of open windows. To safely achieve this, fan placement is important. Avoid placing fans in a way that could potentially cause contaminated air to flow directly from one person over another. One helpful strategy is to use a window fan, placed safely and securely in a window, to exhaust room air to the outdoors. This will help draw fresh air into the room via other open windows and doors without generating strong room air currents.
- Reduce or eliminate recirculation, for example by opening minimum outdoor air dampers. In mild weather, this will not affect thermal comfort or humidity.
- Check filters to ensure they are within service life and appropriately installed.
- Keep systems running longer hours, 24/7 if possible, to enhance air exchanges in the building space.
- Ensure restroom exhaust fans are functional and operating at full capacity.

- Inspect and maintain local exhaust ventilation in areas such as kitchens and cooking areas.
- If ventilation cannot be increased, reduce occupancy level in the building. This increases the effective dilution ventilation per person.

# Wearing Personal Protective Equipment, When Necessary

Beyond the requirement for all workers to wear face coverings, certain tasks may require additional personal protective equipment. Falmouth Housing Authority has made a hazard assessment to determine what tasks require PPE. Falmouth Housing Authority does provide all PPE where necessary including respirators, face shields, protective gowns and gloves.

Falmouth Housing Authority provides PPE in accordance with relevant OSHA standards. There are times when PPE is not required under OSHA standards or other industry-specific guidance, but some workers may have a legal right to PPE as a "reasonable accommodation" under the Americans with Disabilities Act, or other workers may want to use it if they are still concerned about their personal safety, and Falmouth Housing Authority will endeavor to accommodate in those situations.

## **Cleaning and Disinfection to Reduce Hazards**

Falmouth Housing Authority follows current CDC guidelines for Cleaning and Disinfecting to develop, implement and maintain regular cleanings to reduce the risk of exposure to COVID-19. Falmouth Housing Authority requires employees to clean all frequently touched surfaces in the workplace routinely. If surfaces are dirty, they must be cleaned using detergent or soap and water. For disinfection, Falmouth Housing Authority uses EPA-registered disinfectant.

Falmouth Housing Authority is currently discouraging the sharing of tools between workers, but if necessary, the tools must be cleaned and disinfected between uses.

Falmouth Housing Authority performs additional cleaning and disinfection in accordance with CDC guidelines after known or suspected exposure to COVID-19 in the workplace.

## **Workplace Flexibilities**

Falmouth Housing Authority has evaluated existing policies and, if needed, consider new ones that facilitate appropriate use of telework, sick or other types of leave, and other options that help minimize workers' exposure risks.

## **Workplace** Training

Some localities are requiring employers to perform workplace training when reopening. OSHA recommends employers do so and include practices for ensuring employees receive training on the signs, symptoms and risk factors associated with COVID-19; where, how and to what sources employees may be exposed in the workplace; and how to prevent the spread of COVID-19 at work.

Falmouth Housing Authority performs the following training on COVID-19:

- Train workers in the appropriate language and literacy level about their risks of exposure to SARS-CoV-2, what the employer is doing to protect them, including site-specific measures, and how they can protect themselves.
- Train workers about wearing cloth face coverings in the workplace, including any employer policies related to their use and considerations for when cloth face coverings could cause or contribute to a workplace safety and health hazard.
- As required by OSHA standards for PPE, including respiratory protection, and consistent with OSHA and CDC guidance, train workers how to put on, use, and take off PPE; how to clean, maintain, store, and dispose of PPE; and what the limitations of the PPE are. (Note: As described above, cloth face coverings are not PPE, because they protect other people from the wearer's respiratory secretions, rather than protecting the wearer).

# **Record All Work-Related COVID-19 Infections and Deaths**

During this phase in the process, it is important to note that OSHA considers exposure to COVID-19 as a recordable illness. Employers must record cases of COVID-19, if the employer reasonably determines the case:

- Is confirmed as a COVID-19 illness;
- Is work-related; and
- Involves one or more of the general recording criteria, such as medical treatment beyond first aid or days away from work.

For example, if Employee A contracts COVID-19 and is the first in the workplace to do so, it is unlikely to have been work-related. However, if Employee B who works in the same office as Employee A also contracts COVID-19, then it is likely that Employee B's illness was related to work because of the exposure from Employee A. Refer to OSHA's guidance here: https://www.dol.gov/newsroom/releases/osha/osha20200410-2.

OSHA will continue to investigate complaints, referrals, and employer-reported fatalities and hospitalizations to identify potentially hazardous occupational exposures and to ensure that employers take prompt actions to mitigate hazards and protect employees. Complaints received during the initial months of the outbreak describe concerns related to lack of personal protective equipment (PPE), such as respirators, gloves, and gowns. OSHA has also received complaints expressing concern about a lack of training on appropriate standards and about possible COVID-19 illnesses in the workplace. OSHA's Interim Enforcement Guidance can be found here <a href="https://www.osha.gov/memos/2020-04-13/interim-enforcement-response-plan-coronavirus-disease-2019-covid-19">https://www.osha.gov/memos/2020-04-13/interim-enforcement-response-plan-coronavirus-disease-2019-covid-19</a>.

## **Retaliation Prohibited**

Falmouth Housing Authority prohibits retaliation against workers including practices for ensuring that no adverse or retaliatory action is taken against an employee who adheres to safety guidelines or raises workplace safety and health concerns.

Falmouth Housing Authority will communicate the following:

- Ensure workers understand their rights to a safe and healthful work environment, who to contact with questions or concerns about workplace safety and health, and prohibitions against retaliation for raising workplace safety and health concerns.
- Ensure workers understand their right to raise workplace safety and health concerns and seek an OSHA inspection under the Occupational Safety and Health Act.
- Ensure supervisors are familiar with workplace flexibilities and other Human Resources policies and procedures, as well as with workers' rights in general.

Revision Approved by Board of Commissioners on April 20, 2021