

## COVID-19 Safety Plan for Certified Day Program Reopening

<b>Agency Legal Name</b>	Pathfinder Village, Inc.	
<b>Agency Address</b>	3 Chenango Road, Edmeston, NY 13335	
<b>Day Program Type</b>	<b>Certified Site</b> <input checked="" type="checkbox"/> <b>Community, without Walls</b>	<input checked="" type="checkbox"/> <b>Day Habilitation</b> <input type="checkbox"/> <b>Prevocational</b> <input type="checkbox"/> <b>Day Treatment</b> <input type="checkbox"/> <b>Respite</b> <b>Sheltered Workshop</b>
<b>Operating Certificate Number</b>	04930940 (Broome)	
<b>Site Address</b> (certified sites only)	N/A	
<b>Certified Capacity</b> (certified sites only)	N/A	
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The program's Safety Plan must describe procedures to operate the certified day program site or deliver day program service in accordance with the guidance document, Interim Guidance Regarding the Reopening of Day Services Certified by the Office for People With Developmental Disabilities. This document provides the outline to utilize for development of the Safety Plan (or future revision).

Some requirements may not be applicable to community-based services.

Please submit the written safety plan for each program to OPWDD prior to the reopening at [quality@opwdd.ny.gov](mailto:quality@opwdd.ny.gov). In addition, for each safety plan, a completed Day Program Site Attestation must also be submitted. OPWDD will maintain copies of the plans for our records. OPWDD will not be providing approvals of agency plans.

Certified Sites must also maintain a copy of the program's Safety Plan on premises available to facility staff, OPWDD and local health authorities upon request. Community day program services (non-site based, without walls) must also make a copy of the Safety Plan available upon request.

## **SAFETY PLAN COMPONENTS**

**NOTE:** Guidance bullets below are not a substitute for provider review and adherence to content of *Interim Guidance Regarding the Reopening of Day Services Certified by the Office for People With Developmental Disabilities*

### **Signage – applies to certified sites and other locations controlled by the provider**

- Ensure program building entrances have signs that alert that non-essential visitors are not allowed.
- Ensure signs are posted throughout the program building to provide instruction on the critical COVID-19 transmission prevention and containment activities identified in the companion document *Interim Guidance Regarding the Reopening of Day Services Certified by the Office for People With Developmental Disabilities*.

Identify how you will ensure the above and any related strategies:

All entrances have signs posted prohibiting non-essential visitors. Additionally, the sign also has a contact name/number for an Adult Day Services Coordinator in which the person may call to direct their inquiry and/or state need. The Adult Day Services Coordinator will triage the call as needed. If the request/visit is deemed non-essential the visitor will be denied access and the Coordinator will address the request/need through alternative means. If the request/visit is deemed to be essential, the Adult Day Services Coordinator will conduct a Pre-Entry screening of the visitor. If visitor passes the Pre-Screening, the Adult Day Services Coordinator will then proceed with orienting the visitor through all other site-entry protocols and review expectations during their visit. Signage to provide instruction on COVID-19 transmission prevention and containment including proper handwashing techniques are posted throughout the site and near each handwashing station/restroom.

### **A. Entrance to Site Based Programs**

#### **Pre-Entry/Pre-Participation Screening:**

- Screen all individuals, staff, and essential visitors prior to entry into the day program site and/or participation in services/service delivery:
  - per infection control standards for protection of screener and screened person,
  - to include temperature check and required questions on exposure and COVID-19 Symptoms, per NYS DOH and OPWDD guidance documents.
- Maintain daily documentation of all screening of individuals, staff and visitors in compliance with OPWDD and NYS guidance and policy.

#### **Response to Signs and Symptoms and Departure:**

- Safe management of any individual, staff or visitor who fails initial/pre-program screening or is exhibiting signs or symptoms during service delivery, to include:
  - Facilitating departure as soon as possible, and
  - Safely manage separation from people not exhibiting symptoms, until they depart.
- Ensure instruction is provided to any individual or staff sent home due to symptoms to contact their health care provider and written information on healthcare and testing resources.
- Ensure the day program immediately notifies the local health department and OPWDD about the suspected case.

## **Participation and Return to Program/Service:**

- Ensure staff members know to report and how to report positive COVID-19 test results, exposure/possible exposure, and signs and symptoms to their supervisor.
- Ensure individuals do not participate in day services while they or a member of their household or certified residence is being quarantined or isolated.
- Maintain medical documentation allowing an individual or staff member who was COVID-19 positive to return to program site/services.
- Ensure any return of an individual or staff to programs/services occurs only in adherence to OPWDD and NYS DOH guidance regarding quarantine periods and fever free durations.

Identify how you will ensure the above and any related strategies:

**Pre-Entry/Pre-Participation Screenings:** As a Community Without Walls program, we do not have a healthcare professional available to conduct daily screenings, thus Adult Day Services Coordinators (supervisory-level program staff) and/or their Designated Reps will be responsible for the oversight, implementation and appropriate documentation of screenings. The Adult Day Services Coordinators and/or Designated Reps will arrive prior to start of shift for day service employees to allow for time to perform their own self-health screenings including temperature check in accordance to Pathfinder Village agency protocols, as established by Senior Leadership in consultation with the agency's Medical Director. All staff have been extensively trained on this process including what to do in pass/fail situations. Upon successful self-screening, the Adult Day Services Coordinator and/or Designated Rep will proceed to wash their hands and prepare to conduct day program Pre-Entry/Pre-Participation screenings of day service staff and individuals in accordance with the Interim Guidance Regarding the Reopening of Day Services Certified by the Office for People with Developmental Disabilities. The Coordinator and/or Designated Rep will don the appropriate PPE when performing these screenings which is to include at a minimum an approved face mask and gloves. Additional PPE (i.e. face shield, gown, N95 masks) are accessible to screeners if they desire to have additional personal protection for their own comfort-level. It should also be noted that temperature checks will be performed using contactless thermometers. Screeners will document the health screenings using the Adult Day Services Screening Tool (refer to screening form for details). The health screening assessment will ask about: (1) COVID-19 symptoms in the past 14 days; (2) positive COVID-19 test in the past 14 days; (3) close contact with a confirmed or suspected COVID-19 case in the past 14 days and/or (4) travel from within one of the designated states with significant community spread. Documentation will be kept in a secure locked area.

**Response to Signs and Symptoms and Departure:** Any staff or individual exhibiting signs or symptoms of COVID-19 upon arrival will not be allowed to work/participate in day services. Staff will be sent home and instructed to call their healthcare provider for further assessment and testing. They will be provided with written information on local healthcare and testing resources. ADS Coordinator will notify Human Resources who will assist in navigating/monitoring status of staff. The day program in collaboration with Human Resources will notify the local health department and OPWDD about any suspected cases. For individuals who fail screening, the ADS Coordinator will first ensure safe and immediate separation from other arriving staff/individuals. ADS Coordinator will then notify the individual's Emergency Contact to inform and instruct that the individual follow up with their healthcare provider for further assessment and testing. ADS Coordinator will arrange for departure and written information regarding local healthcare and testing resources will be sent home with the individual.

**Participation and Return to Program/Services:** All staff and participants will be provided with written information regarding our re-opening plan and expectations for following all safety procedures. Written information will include a list of COVID-19 symptoms to monitor for, Current COVID-19 screening questions, as well as contact information for an Adult Day Service Coordinator. Individuals and families

will be encouraged to reinforce safety concepts at home--especially to keep circles small, practice social distancing, wear a mask when out in the community and perform frequent hand washing. Similarly, Pathfinder Village Day Program will also work with other key stakeholders (i.e. group homes, family care homes) to ensure they understand our policies and to report if any members of the individual's household are being quarantined or isolated. Staff and individuals will not be allowed to return until they are medically cleared to return to work/programming and only in adherence to OPWDD and NYS DOH guidance regarding quarantine periods and fever free durations. In the event of a COVID-19 positive case, medical documentation showing proof of clearance to return will be kept on file in a confidential and secure area.

## **B. Social Distancing Requirements:**

**Ensure effective practices to facilitate social distancing when distancing is not possible, including the following:**

- Reduction of total number of individuals served at one time, in order to reduce congestion and facilitate easier social distancing;
- Plans to maintain no more than 50% occupancy in small/confined spaces within a program, such as a staff break room;
- Potential use of physical barriers within site-based spaces;
- Planned use, capacity and arrangement of furniture and/or work equipment in program rooms, workspaces and meal and seating areas to allow for social distancing of at least six feet apart in all directions (i.e. 36 square feet) and limit density. (Note an individual's needs may require individual to staff distance to be less than six feet);
- Use of signage and floor markers/distance markers denoting spaces of six feet throughout program area spaces, common spaces, waiting areas, entry, exits and other areas of travel;
- Facilitate one directional foot traffic where necessary in narrow spaces, using tape or signs with arrows;
- Install physical barriers, as appropriate, especially when physical distancing is not feasible between program/workspaces;
- Support and education of individuals to learn physical distancing/use of markers, patterns of movement, and other program strategies;
- Maintain a staffing plan to prevent employees who should need to "float" between different rooms or different groups of individuals, unless such rotation is necessary to safely support individuals due to unforeseen circumstances (e.g. staff absence).
- Provide adequate space and operational practices (e.g. staggered break times) for staff to adhere to social distancing while completing independent tasks (i.e. paperwork) and when taking breaks (i.e. eating or smoking).

Identify how you will ensure the above and any related strategies:

**Social Distancing Requirements:** In surveying our agency's physical footprint and restructuring our staffing patterns and in consideration of our unique program demographics, we have implemented a number of resourceful strategies to promote safe environments for those attending day program. It's important to note that more than 80% of individuals served in our day program reside in certified residences operated by Pathfinder Village. Since the on-set of the COVID-19 crisis, we redeployed our staff to work in these residences to provide day programming and support the health and safety of

individuals. These homes have not been allowed to co-mingle since March and we practiced a similar strategy in terms of staffing to the highest extent possible. This model has proven effective and has actually promoted some better outcomes with individuals. With this in mind, we have opted to continue to utilize this model as currently authorized by Appendix K. Therefore, each home will be its own self-contained "pod" with dedicated staff. We will have a total of 8 "pods" with group sizes ranging anywhere from 2 to 6 individuals per pod. Three of the pods will have 100% of program based in the home. Five of the pods will receive 4 days of in-home programming and one day off-site programming. Schedules are coordinated in a controlled manner so that Pod #1 goes off-campus on Monday, Pod #2 goes off campus on Tuesday, etc.

Pods that go off-campus will use a dedicated Pathfinder Village-owned property (uncertified) which will be used solely to support this day program need only. No other individuals/staff will have access. Therefore, only a single "pod" will utilize the physical space at any one time.

This would allow us to provide wrap-around activities to further compliment individuals in-home day program. Each pod will have its own dedicated staff and assigned vehicle to transport individuals. Using a 7-passenger vehicle the pod staff will transport individuals to this location in-line with social distancing/transportation guidelines. Thus, depending on pod group size and staff, there may be multiple "legs" required (however please note, the distance is less than 2-miles away). Additionally, each home will have their own dedicated vehicle for purposes of transporting individuals to this alternative site. Vehicles have a strict sanitizing schedule before, during and after use. After each "leg," vehicle and all surfaces will be wiped down. Vehicles also have a routine fogging schedule to commercially disinfect (refer to vehicle cleaning schedule for details).

Once transported, the pod staff will also remain at the location to continue to provide day programming at that location. While at the site, individuals will have the opportunity to practice their social distancing skills and mask use in a safe and controlled environment. There will be no other community outings authorized at this time. This will give the day program staff the opportunity to re-orient individuals to transitioning to a day program once again while assessing how the individuals perform in a day hab-like environment (without the risk of being exposed to others). Day program staff will simulate public environments to teach individuals how to appropriately social distance and navigate places like a grocery store, post office, bank etc. We will also familiarize residents with using modified work areas with physical barriers, etc. As we continue to navigate in this landscape and depending on local COVID infection rates, we can then look to phase in expanded opportunities such as introducing some co-mingling and/or going on community outings but at a pace that continues to support the optimal health and safety of these individuals. After use, day program staff will wipe down all surfaces, sanitize and disinfect space with foggers using a cleaning solution approved by CDC and NYS DOH as an effective cleaning agent against the COVID-19 virus.

The other physical building that will be used to support day programming will be solely designated for individuals who live in the community, other group homes or family care homes not operated by Pathfinder Village. As we feel this is more of a higher risk group, we have taken many precautions and safety measures as emphasized above. This site will be self-contained including a designated pool of staffing. Out of 14 community individuals served we have confirmed 6 individuals who will attend first. The physical layout of the building has seven rooms on the first floor and 4 rooms on the second floor which will allow ample space for individuals to appropriately social distance. Additionally, one larger room has been modified to allow small group activities to still take place for up to 4 individuals at once with clear see-through plastic barriers in between each individual workspace which all face each other (a concept that is being recommended for use in public schools). The site has all appropriate signage including visual prompts that have been modified for individuals who are unable to read. Individuals will be encouraged to wear masks at all times to allow them freedom of movement throughout the space and have a greater degree of independence. That said, we recognize how challenging this is and therefore have designated two "Mask Relaxation Stations" which is a private room where individuals may spend time away from others in isolation and remove their mask. As day program staff start to work with this demographic again,

we will assess each individual's performance and ability to demonstrate effective social distancing and utilize appropriate judgement as to when they should or shouldn't have to wear a mask. We have a plan in place to reduce shared materials by providing each individual with their own supplies, instructional materials and activity kits which will be stored in their own individually labeled Tupperware tote bins. Water cooler has been moved to an area away from common spaces and foot traffic. Furniture throughout the building has been moved and strategically placed to support natural social distancing. Furthermore, being a rural provider, we are fortunate to have large wide-open lawn space to support programming and activities outside, weather permitting. There is an attached deck in which we have rearranged deck furniture to support social distancing and we have also obtained a large portable pop up tent to provide additional picnic space on the lawn which would shade individuals from the sun.

Staff will wear their masks at all times and will have staggered lunch breaks. One room on the second floor will be utilized as a staff break room and will accommodate one staff at a time. Similarly, staff have a larger office upstairs in which their paperwork can be completed which can support a max capacity of 3 individuals.

### **C. Gatherings in Enclosed Spaces**

- Modifications to day program/service hours as needed, to allow blocks of service provision while maintaining reduced capacity and group size.
- Planned group size, which will be limited to no more than fifteen (15) individuals who receive services. The restriction on group size does not include employees/staff.
- Ensure the group ( $\leq 15$ ) of individuals receiving services and staff working with them are as static as possible.
- Ensure that different stable groups individuals and staff, have no or minimal contact with one another and do not utilize common spaces at the same time, to the greatest extent possible.
- Stagger staff and/or individual meal and break times to maintain social distancing.
- Adhere to social/physical distancing practices identified in the safety plan.
- Prohibit shared food and beverages and buffet style dining.
- Require that food brought from home must require limited preparation (i.e. heating in microwave) during day services and be packed appropriately.
- Ensure reusable food utensils and storage containers are washed in the dishwasher on the hottest wash and dry setting.

Identify how you will ensure the above and any related strategies:

Again, as our plan calls for the continued practice of providing in-home programming, this greatly eliminates many of the logistical considerations mentioned above. Individuals will be eating in their own residences (aka "pod"). At the on-set of the COVID-19 crisis, Pathfinder Village implemented a number of policies such as no sharing of food or beverages, no takeout or food to be allowed into the home from parents, etc.

As for individuals living in the community who will be accessing the program, we are enforcing the guidelines mentioned above. Requesting that individuals bring their own packed lunch. We are also encouraging use of paper products and plastic disposable silverware and individually labeled water bottles which individuals bring in from home.

## D. Day Program Schedules and Activities

- Modifications to day program/service hours as needed, to allow blocks of service provision while maintaining reduced capacity and group size.
- Focus on activities with little or no physical contact and which do not rely on shared equipment, to the extent possible.
- Schedule individual's activities to reduce density and allow for social distancing.

Identify how you will ensure the above and any related strategies:

Individuals attending day program who reside in PV operated residential homes will be receiving in-home programming in their own pod. All residential protocols for disinfecting, social distancing, etc. will be maintained as they have been since March 15th (see Residential protocols for more details). For individuals living in the community, we are starting with 5 individuals and 3 self-contained staff. As stated above, there is ample room for social distancing and a plan for reducing shared equipment/supplies.

## E. Personal Protective Equipment:

- Ensure all staff wear an appropriate cloth or disposable face mask/covering that covers both the mouth and nose, at all times while providing services, consistent with all current Executive Orders and OPWDD guidelines (unless medically contraindicated / not tolerated).
- Ensure all essential visitors wear a face mask or covering, providing a facemask onsite at no cost, if visitors do not have their own which meets requirements.
- Support individuals receiving services to wear face coverings, as tolerated, whenever social distancing cannot be achieved.
- Maintain an adequate supply of required PPE on site (and available to staff for when needed for community-based services) to minimally include masks and gloves, and with gowns and face shields as needed.
- Train all staff on proper use of PPE including when necessary to use, donning, doffing, disposing and/or reusing and sanitizing when appropriate.
- Retain documentation of trainings in the employees' personnel files and per agency procedures.

Identify how you will ensure the above and any related strategies:

All staff will wear approved masks at all times while providing services. As our staff have been re-deployed to work in our residential homes since March, we know they have all been trained on PPE, COVID-19, safety protocols, etc. and are all compliant with these standards. Each home/day program site has a supply of PPE available to them such as gloves, disposable masks, N95 masks, gowns, face shield, etc. if/when needed. Additionally, gloves and masks are stocked in various sizes to ensure staff comfort and proper fit. Vehicles also have both a cleaning kit as well as extra PPE on hand as a precaution. All staff have been trained on proper use of PPE and a record of training(s) are on file.

## F. Hygiene and Cleaning

### Personal Hygiene to Reduce Transmission:

- Ensure strict adherence to hygiene requirements to reduce transmission as advised by NYS DOH and the CDC.
- Provide and maintain hand hygiene stations at each location to include:
  - Handwashing: soap, running warm water, and disposable paper towels.
  - Hand sanitizing: alcohol-based hand sanitizer containing at least 60% alcohol for areas where handwashing facilities may not be available or practical, and where the need for frequent hand sanitizing is expected.
- Train staff to wash their hands frequently with soap and water for at least 20 seconds using techniques per NYS DOH and CDC guidance, including the conditions that require handwashing.
- Support individuals to wash their hands frequently/when needed, with soap and water, for at least 20 seconds using appropriate techniques as tolerated.
- Encourage and facilitate use of hand sanitizers by staff and individuals upon arrival to and departure from program and through the day, providing supervision/support of use by individuals as needed.
- Address any individualized needs affecting the unsupervised availability of hand sanitizer.

**Cleaning and Disinfection of Environment, Equipment and Supplies:**

- Strictly adhere to sanitation requirements as advised by NYS DOH guidance documents.
- Implement the following minimum standards regarding cleaning and sanitizing:
  - Frequent cleaning and rigorous disinfection of high-risk areas/high touch surfaces;
  - Use of only EPA registered products for disinfecting non-porous surfaces;
  - Adhere to proper dwell times for all cleaners, sanitizers and disinfectants per manufacturer recommendations as indicated on the product label; and
  - Ensure adequate ventilation to prevent inhaling toxic fumes.
  - Maintain site cleaning logs indicating the date, time, and scope of cleaning.
  - Keep cleaning products, sanitizers and disinfectants secure and out of reach of individuals who may misuse;
  - Safely and immediately discard used gloves, paper towels or other disposable items after sanitizing or disinfecting, tied in a trash bag and removed from the environment.
  - Clean and disinfect all areas and equipment used by a person exhibiting symptoms upon their departure from the area and prior to use of the area or equipment by other individuals or staff.
  - PPE use and hand hygiene when cleaning and disinfecting causes safety hazards.
  - Provide ventilation with outside air safely and when possible.
- Limit use of shared objects/equipment. Ensure shared items are cleaned and/or sanitized after each use. Require hand hygiene before/after contact and glove use when feasible.
- Prohibit use of items/objects that cannot be cleaned and sanitized (i.e. soft object, cloth placemats, etc.) unless clinically required.
- Prohibit bringing personal items from home, except when clinically necessary, then have a plan for regular cleaning and disinfection including immediately prior to departure.

Identify how you will ensure the above and any related strategies:



We have established strict protocols around Hygiene and Cleaning. We have installed numerous contactless hand sanitizer dispensers throughout each site--especially in higher traffic areas (i.e. hallways, entrances, exits, and commonly used rooms). Additionally, we have placed pump bottles throughout sites and in each room for easy use. All bathrooms have soap/paper towel dispensers on walls. Signage with visual prompts demonstrating appropriate hand washing techniques are posted in each bathroom and handwashing station. Staff will ensure all individuals will frequently wash their hands on arrival, before eating, after eating, utilizing a restroom, before leaving and any other time their hands may become soiled. For individuals who requires physical assist and/or verbal prompting, staff will accompany individual to handwashing station and ensure task is completed as needed. In addition to frequent handwashing, staff will direct individuals to use hand sanitizer.

Individuals and staff will be prohibited from bringing in personal objects from home--especially if they are of a material that cannot be properly sanitized (i.e. cloth stuffed animal). Only sensory objects that are needed by the individual will be allowed if clinically justified/needed and if so, will be labeled for individual use only. Program has purchased additional equipment/supplies so that each individual can have their own set of materials which will be labeled and stored in their own bin for personal use. Additionally, at the end of each day, program staff will wipe down materials and disinfect bins after individual leaves to prep for the next day.

As far as environmental cleaning, all program staff have been trained on cleaning and use of approved disinfection products. Frequently touched surfaces/workspaces will be wiped down after each use. Doorknobs, handles, light switches will be cleaned throughout the day on a schedule. At the close of program, all spaces/bathrooms will be cleaned, floor mopped, and space will be fogged using an approved disinfectant as directed by NYS DOH for use in killing COVID-19 virus. Staff have been trained on fogging procedure and use of PPE.

Cleaning logs and schedule has been created and will be frequently used by staff to document their activities. The Adult Day Services Coordinator will check these logs often to ensure effective cleaning and frequency is being done. Additionally, our compliance dept. and Senior Leadership will also be reviewing this process to ensure compliance.

## **G. Transportation**

Ensure that the following measures are implemented for the transport of individuals to/from day services to reduce COVID-19 transmission risk, when providing or contracting for transportation:

- Ensure only individuals and staff from the same facility will be transported together; preventing individuals or staff from other residences to be intermingled whenever possible;
- Reduce capacity on buses, vans, and other vehicles to 50% of total capacity;
- As possible, stagger arrival and departure times to reduce entry and exit density.
- To the extent possible, restrict close contact of individuals and staff by not sitting near each other or the driver.
- If there are multiple doors in a bus or van, utilize one-way entering and exiting. Provide instruction for individuals to exit the vehicle one at a time and wait for driver or staff instruction before doing so.
- Ensure staff and the driver always wear face coverings in the vehicle. Ensure staff who cannot medically tolerate the use of a face covering are not assigned to transport individuals.

- To the extent they can medically tolerate one, support individuals to wear masks in vehicles.
- After each trip is completed, clean and disinfect the interior of the vehicle before additional individuals are transported; and
- Where appropriate and safe, roll windows down to permit air flow.

Identify how you will ensure the above and any related strategies:

As far as transportation, all vehicles will have a vehicle cleaning kit which includes PPE, hand sanitizer, cleaning wipes, tissues, garbage bags. Driver will be responsible to follow vehicle protocols during transportation which will include, ensuring appropriate vehicle capacity, social distancing, mask use, use of hand sanitizer upon entering vehicle, ventilating air circulation while driving to the extent able, and thoroughly cleaning vehicle after each use. Our agency has purchased a number of foggers which will be used to disinfect both vehicles and sites as per our cleaning schedule (refer to schedule for details).

Again, given our program design and small number of community participants (5), our transportation plan would be as follows:

- Individuals receiving in-home programming will have access to a dedicated vehicle assigned for their exclusive use.
- Community Member Plan: (Dedicated Physical site with self-contained staff for a total of 5 individuals)
- 3 Community Routes using 7 passenger vehicles: In addition to driver, Route #1 has one individual; Route #2 has two individuals; Route #3 has 2 individuals.

Individuals are coming from various geographic areas and would arrive to program at staggered times.

## H. Tracing and Tracking

- Notify the local health department and OPWDD immediately upon being informed of any positive COVID-19 test result by an individual or staff at their site.
- If a staff or visitor test positive, procedures for day service cooperation with the local health department to trace all contacts in the workplace and notify the health department of all staff, individuals and visitors who entered the facility dating back to 48 hours before the positive person began experiencing COVID-19 symptoms or tested positive, maintaining confidentiality as required by federal and state law and regulations.

Identify how you will ensure the above and any related strategies:

In the event of a positive COVID-19 case, Health Department would be notified per procedure. Day Program has created tracking/tracing logs to monitor all movement of individuals and staff. We would cooperate with local health department officials and OPWDD to ensure tracing activities occur and that all individuals and staff impacted are appropriately informed and advised as needed.

## ADDITIONAL SAFETY PLAN MEASURES:

Please use this space to provide additional details about your program's Safety Plan, if appropriate.

Our initial re-opening plan is very small, tightly contained and conservative in its approach keeping individual and staff safety as our number one focus. We anticipate executing a roll-out of several phases over a long duration. This will allow us to introduce small elemental changes, allow us to evaluate and monitor impact of those changes before introducing the next phase. Given our unique demographic, agency resources and small size, we feel this is the best plan for our day program at this time.

To summarize overall model:

For individuals who attend PV day program but also reside in a PV-controlled certified residential home, we have elected to continue to provide in-home day service programming as currently authorized by Appendix K. We have dedicated a physical building off campus as a safe space where each home/"pod" will have their own scheduled time for use once a week for up to 4 hours. There will be no co-mingling with people outside of their home. Additionally, no community trips are being allowed at this time.

For individuals who attend PV day program but reside in the community, we have dedicated their own physical building and isolated staff. There are currently 5 individuals who will be utilizing this space with 3 staff members. We will execute all the health/safety precautions as described above. The building is a two-story, 13 room space which is more than ample space to safely provide day services as advised in our interim guidance.

For more planning details, we have developed a Day Program COVID Operational Manual which has a variety of policies, procedures, cleaning logs template, tracking forms, screening tools, etc. which can be shared in the event of an audit.