COVID-19 Safety Plan
for Certified Day Program Reopening

<table>
<thead>
<tr>
<th>Agency Legal Name</th>
<th>Job Path</th>
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</thead>
<tbody>
<tr>
<td>Agency Address</td>
<td>256 W. 38th Street, 2nd Floor, New York, NY 10018</td>
</tr>
<tr>
<td>Day Program Type</td>
<td>X Certified Site, X Day Habilitation, □ Prevocational, □ Day Treatment, □ Respite, □ Sheltered Workshop</td>
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<tr>
<td>Operating Certificate Number</td>
<td>7165407</td>
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<tr>
<td>Site Address (certified sites only)</td>
<td>256 W. 38th Street, 2nd Floor, New York, NY 10018</td>
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<tr>
<td>Certified Capacity (certified sites only)</td>
<td>45</td>
</tr>
<tr>
<td>Primary Contact Name</td>
<td>Carly Teichman</td>
</tr>
<tr>
<td>Primary Contact Email and phone</td>
<td><a href="mailto:Cteichman@jobpathnyc.org">Cteichman@jobpathnyc.org</a>, 212-944-0564 x 237</td>
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</tbody>
</table>

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. 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:

The above is not relevant to Job Path at this time because we will not be providing services at the Job Path site. We will be providing face-to-face support to people individually or in small groups of two to three. All face-to-face services will be provided in the community or in people’s homes. We will continue to use a virtual platform for group services. All services, whether in the community or in a home, will follow OPWDD and CDC safety guidelines. Please see attached policy and procedures.

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 how 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 the program site/services.

- Ensure any return of an individual or staff to programs/services occurs only in adherence to OPWDD and NYSDOH guidance regarding quarantine periods and fever free durations.

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

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

Prior to each scheduled face-to-face shift the following will occur:

- Prior to a DSP arriving at an individual’s home, a supervisor (one of Job Path’s coordinators or program managers) will contact the service recipient to conduct a COVID-19 Screening, which is available on a Google form.

- Prior to a DSP beginning service each day, the DSP will complete a self-screening of Covid symptoms using a COVID-19 Screening form, and a supervisor (one of Job Path’s coordinators or program managers) will review the screening.

- The COVID-19 Screening goes through COVID-19 symptoms, temperature check, possible exposure, and travel.

- If “no” was answered for all the questions, service can be provided.

- If “yes” was answered to any of the questions, service cannot be provided until further investigated.

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

Before being assigned to provide in-person services, Job Path will ensure that DSPs have been trained to recognize signs and symptoms of COVID-19. If staff, an individual or family member is experiencing COVID-19 symptoms or develops COVID-19 symptoms, service will be suspended immediately and the individual will be returned home. The coordinator (supervisor) will contact the individual and/or family to let them know that they should remain home until further guidance is obtained from their healthcare provider. The supervisor will also provide them with instructions advising them to contact a healthcare provider and to obtain testing. Individuals/families have been provided with information about testing by Job Path, but the coordinator will provide the information again if necessary. The coordinator will document these conversations in the case file and send a copy to the senior program director. In addition, if a DSP starts to experience COVID-19 symptoms, they will immediately suspend service, return the individual home and contact their supervisors. The DSP will go home and inform their healthcare provider. All individuals, families and staff have been notified of the testing centers in the five boroughs. If they do not have a health care provider, Job Path will provide them access to the agency’s nurses. The senior director of the program will be notified about any of the above scenarios.
Participation and Return to Program/Service:

Staff is aware that they must report any COVID-19 positive cases or suspected cases to their supervisor and the Chief Compliance Officer. Suspected or confirmed COVID-19 cases will be reported to DOH and OPWDD by the Chief Compliance Officer. Staff and individuals must contact their healthcare professional regarding treatment and testing. Job Path will provide information and resources regarding testing and healthcare options if needed.

All suspected or confirmed COVID-19 cases will be documented and tracked by the program directors, Chief Compliance Officer and Human Resources. Staff and individuals may not resume services until the treatment and testing protocol as set by DOH and their healthcare professional has been followed and it has been assured that it is safe for them to resume services. This assurance may include confirmation of completed quarantine or medical documentation from a healthcare professional. The senior program director will communicate with the Day Habilitation supervisory team at the beginning of each week to ensure individuals and staff are not returning to support until assurance of quarantine or medical documentation is provided.
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).

As indicated above, Job Path will not be utilizing a site. Services will be provided in the community or in a person’s home. Staff has been trained on social distancing guidelines and will ensure that social distancing is maintained with people encountered in the community. Staff has been trained on how to educate individuals on maintaining social distance with staff and in the community. If support is provided in the home, staff will maintain social distance from the individual and family to the extent possible.

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 (≤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 meals 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:

As indicated above, Job Path will not utilize a site at this time. All group opportunities will continue virtually. Occasionally two to three individuals may be served at the same time in community settings. These groups will follow social distancing practices in the community, and staff will guide and reinforce these social distancing practices. Services will be provided outdoors whenever possible.

<table>
<thead>
<tr>
<th>D. Day Program Schedules and Activities</th>
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<tbody>
<tr>
<td>Modifications to day program/service hours as needed, to allow blocks of service provision while maintaining reduced capacity and group size.</td>
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<tr>
<td>Focus on activities with little or no physical contact and which do not rely on shared equipment, to the extent possible.</td>
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<tr>
<td>Schedule individual’s activities to reduce density and allow for social distancing.</td>
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Identify how you will ensure the above and any related strategies:

When Job Path provides community-based service, they will focus on activities and goals from the Staff Action Plan. At all times, staff and individuals will wear masks, carry hand sanitizer, and maintain social distancing whenever possible. Community outings to stores, outdoor restaurants, salons, etc., will be extremely limited in frequency and duration, and we will abide by the capacity limitations of such locations. Staff will utilize open outdoor space wherever possible. If tablets/cell phones need to be shared, staff, wherever possible, will sanitize devices before and after use. If the weather doesn’t permit outdoor service, service will move to a virtual setting, or, with permission from the family and pre-Covid screening conducted, service can be provided in the home with all COVID precautions in place, i.e. social distancing and mask wearing. All Job Path staff will ensure that individuals are washing and/or sanitizing hands throughout the day, implementing social distancing whenever possible, and wearing face coverings whenever social distancing cannot be maintained. Staff have been trained to follow these same protocols.
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 are required to wear face masks at all times during a support shift. All staff have received hand sanitizer and a supply of disposable surgical masks that covers the mouth and nose. Job Path will replenish these supplies as need requires. Coordinators/Sr. Director will ensure that individuals and families have the proper PPE to receive service, providing supplies if necessary. Job Path has an adequate supply of masks and sanitizer for this purpose. Staff will assist individuals receiving services to wear face coverings whenever social distancing cannot be achieved.

Staff have been trained to properly wear masks, which includes donning, doffing, and disposing, and will ensure that individuals/families understand these procedures. Training is completed prior to staff providing in-person support. Staff training is documented and retained in employee personnel files.

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:

As indicated above, Job Path will not utilize a site at this time. Job Path staff are trained to wash their hands regularly and to disinfect phones and other surfaces that they touch. They will assist individuals to do the same. Job Path will ensure that staff and individuals have an adequate supply of hand sanitizer and will provide hand sanitizer at no cost to staff and individuals. Currently, most of Job Path’s supports are virtual and many of the above items do not pertain to us.

**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:

Job Path does not provide transportation and relies on public transportation. However, during this time, public transportation will not be used unless absolutely necessary. Support will be provided in and around a person’s community unless this is not feasible. If public transportation must be used, staff will ensure that the subway/bus isn’t crowded and that there is enough space to adhere to social distancing. Staff have been trained to use hand sanitizer before and after they utilize the train/bus and to wear masks while using public transportation. They will ensure that individuals follow this protocol and will assist individuals with mask wearing and hand sanitizing if needed.

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:

Job Path’s Chief Compliance Officer will notify the Local Health Department and OPWDD immediately upon being informed of any positive COVID-19 test result received by an individual or staff member. Additionally, if a staff member tests positive, Job Path has in place procedures for 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.
ADDITIONAL SAFETY PLAN MEASURES:
Please use this space to provide additional details about your program’s Safety Plan, if appropriate.