

PREPAREDNESS AND RESPONSE PLAN

Constance Brown Hearing Centers (“Company”) takes the health and safety of our employees seriously. With the spread of COVID-19 and the need for certain employees to continue in-person work, either because they are critical infrastructure workers or they are needed to conduct minimum basic operations for the Company, the Company is committed to reducing the risk of exposure to COVID-19 at the Company’s workplace(s) and to providing a healthy and safe workplace for our employees.

This Plan is based on information and guidance from the CDC and OSHA at the time of its development, and is subject to change based on further information provided by the CDC, OSHA, the State of Michigan, and other public officials. The Company may also amend this Plan based on operational needs.

The Company has identified the following potential sources to spread COVID-19 in the workplace:

- The general public
- Patients
- Co-workers
- Vendors/visitors

Our employees fall into one or more the following categories *See Appendix A Staff Exposure Risk*:

- Lower exposure risk (the work performed does not require direct contact with people known or suspected to be infected with COVID-19 or frequent close contact with the public).
- Medium exposure risk (the work performed requires frequent and/or close contact with people who may be infected with COVID-19 but who are not known COVID-19 patients, or contact with the general public in areas where there is ongoing community transmission).

COVID-19 WORKPLACE COORDINATOR

The Company has designated the following individual as its COVID-19 Workplace Coordinator: Ginger Worth. The Coordinator is responsible for staying abreast of federal, state and local guidance and incorporating those recommendations into the Company’s workplace. The Coordinator is also responsible for reviewing human resources policies and practices to make sure that they are consistent with this Plan and existing federal, state and local requirements.

The Coordinator can be reached at the following:

Phone number: (269) 806-7098

Email address: gingerw@cbrown.org

RESPONSIBILITIES OF THE LEADERSHIP TEAM

The Leadership Team must be familiar with this Plan and be ready to answer questions from employees. The Leadership Team must set a good example by following this Plan at all times. This involves practicing good personal hygiene and jobsite safety practices to prevent the spread of the virus. The Leadership Team must encourage this same behavior from all employees.

RESPONSIBILITIES OF EMPLOYEES

The Company is asking every one of our employees to help with our prevention efforts while at work. In order to minimize the impact of COVID-19 at our worksite(s), everyone must play their part. As set forth below, the Company has instituted various housekeeping, social distancing, and other best practices at our workplace(s) to minimize exposure to COVID-19 and prevent its spread in the workplace. All employees must follow these best practices at all times for them to be effective. Beyond these best practices, the Company requires employees to report immediately to their onsite supervisor if they are experiencing signs or symptoms of COVID-19, as described below. The onsite supervisor will be the staff person responsible for health screenings at the door at each location. If a member of the leadership team is onsite, they will assume the responsibility of the supervisor. The onsite supervisor is also responsible for:

1. Ensuring that health screenings are performed daily by each staff member in that office
2. Report issues to the workplace coordinator including employees sent home for symptoms of COVID-19
3. Answer questions from county or state officials that may inquire about our preparedness plan.

If employees have a specific question about this Plan or COVID-19, they should ask their supervisor or the Leadership Team.

OSHA and the CDC have provided the following control and preventative guidance for all workers, regardless of exposure risk:

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes with something other than hands.
- Avoid close contact with people who are sick.
- While there is community spread of COVID-19, maintain appropriate social distance of at least six feet to the greatest extent possible.

In addition, employees must familiarize themselves with the symptoms and exposure risks of COVID-19. Symptoms of COVID-19 may appear 2-14 days after exposure to the virus (and are not explained by a known medical or physical condition).

(i) any one of the following

- Fever*
- Uncontrolled cough*
- Shortness of breath*

(ii) at least two of the following

- Loss of taste or smell
- Muscle aches
- Sore throat
- Severe headache
- Diarrhea
- Vomiting
- Abdominal pain

If employees develop a fever or display one of the principal symptoms* or has at least two other principal symptoms, they must not report to work, notify their supervisor immediately, remain at place of residence, and consult their healthcare provider. Likewise, if employees come into close contact with someone who tested positive for COVID-19 or with someone who displays one of the principal symptoms* or has at least two other principal symptoms,, they must not report to work, notify their supervisor immediately, remain at their place of residence, and consult their healthcare provider. The Company will also work to identify any employees who have close contact with individuals with COVID-19 symptoms.

“Close contact” is defined by the CDC as “someone who was within 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period starting from 2 days before illness onset (or, for asymptomatic patients, 2 days prior to test specimen collection) until the time the patient is isolated.”

WORKSITE PREVENTATIVE MEASURES

Minimizing exposure from co-workers. The Company will take the following steps to minimize exposure from co-workers to COVID-19:

- Educate employees on protective behaviors that reduce the spread of COVID-19 and provide employees with the necessary tools for these protective behaviors, including:
 - Posting CDC information, including recommendations on risk factors at home and in the community
 - Providing tissues and no-touch disposal receptacles to minimize exposure to infectious secretions
 - Inform employees of the importance of good hand hygiene. Regularly washing hands with soap and water for at least 20 seconds is one of the most effective ways for employees to minimize exposure to COVID-19. If soap and water are not

readily available, employees should use alcohol-based hand sanitizer that is at least 60% alcohol. If hands are visibly dirty, soap and water should be chosen over hand sanitizer.

- Encourage good hand hygiene by ensuring that adequate supplies of soap and hand sanitizer are maintained and placing hand sanitizers in multiple locations.
 - Discourage handshaking and instead encourage the use of other non contact methods of greeting
 - Avoid other employees' phones, desks, offices, other work tools and equipment, and other commonly touched surfaces when possible. If necessary, clean and disinfect them before and after use
 - Avoid sharing food utensils and food with other employees
 - Encourage and require social distancing to the greatest extent possible while in the workplace
 - Encourage employees to minimize ride-sharing. While in vehicles, employees must ensure adequate ventilation
 - Use masks, gloves and other PPE
 - See Appendix B for Medium and High Risk employees***
 - Develop protocol for social distancing practices.
 - Create safe zones for employees using physical barriers
 - Evaluate areas where employees work within 6 feet of each other and determine options to increase distance apart.
 - Limit in-person meetings
 - Restrict the number of workers present on-site to no more than necessary
 - Consider staggered shifts, break times, etc.
 - Consider new shifts
 - Promote remote work as much as possible
 - Deliver products through curb-side pick-up or delivery
- Restrict employees from the workplace if they display one or more of the symptoms of COVID-19
 - Implement health assessments and/or questionnaires prior to entry into the workplace
 - Immediately separate any employee with symptoms from other individuals and send employee home
 - Actively encourage sick employees to stay home if they have tested positive with COVID-19 or display the principal symptoms of COVID-19
 - Apply available paid time off options and flexible attendance requirements
 - Follow state and federal guidance for return to work
 - Implement protocol for return to work after testing positive for COVID-19 or displaying one or more of the symptoms of COVID-19. State of Michigan, recommends employees should not return to work until:
 - 24 hours have passed since the resolution of fever without the use of fever-reducing medications;
 - 10 days have passed since their symptoms first appeared or since they were swabbed for the test that yielded the positive result; and

- other symptoms have improved.
- Actively encourage employees to stay home if they have been in close contact with a an individual who tests positive for COVID-19 or with an individual who displays the principal symptoms of COVID-19
 - Apply available paid time off options and flexible attendance requirements
 - Implement protocol for return to work after an employee has been in close contact with an individual who tests positive for COVID-19 or with an individual who displays one or more of the principal symptoms of COVID-19. State of Michigan recommends employee should not return to work until either
 - 14 days have passed since the last close contact with the sick or symptomatic individual*; or
 - The individual displaying COVID-19 symptoms receives a negative COVID-19 test.

**The CDC continues to endorse a 14 day quarantine period, but has given an option to reduce quarantine to reduce the hardship of taking time off of work. Local, public health authorities, however, make the final decisions about how long quarantine should last, based on local conditions and needs. Options they will consider include stopping quarantine*

- *After day 10 without testing*
 - *After day 7 after receiving a negative test result (test must occur on day 5 or later)*
- Develop protocol to follow if an employee has a confirmed case of COVID-19. ***See Michigan.gov FAQ: I have an employee who was diagnosed with COVID-19. What do I do next?***
 - Inform staff they have been exposed (do not identify the person with COVID-19).
 - Communication plan with co-workers, including symptoms to watch for and steps to take
 - Work with local health department
 - Evaluate OSHA reporting/recordkeeping requirements
 - Implement protocol for return to work, including workplace contact tracing and CDC-recommended cleaning and disinfecting in all affected areas ***See Michigan.gov FAQ: Do I need to close my business if someone that works here is diagnosed with COVID-19?***
- Perform increased routine environmental cleaning and disinfection ***See Appendix C for recommended products provided by CBHC***
 - Instruct employees to sanitize the work areas upon arrival, throughout the workday, and immediately before departure
 - Routinely clean and disinfect all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, and doorknobs.
 - Provide disposable wipes so that commonly used surfaces (for example, doorknobs, keyboards, remote controls, desks, other work tools and equipment) can be wiped down by employees before each use.
 - Maintain Safety Data Sheets of all disinfectants used on site

- Eliminate/restrict work-related travel if possible and limit employees' exposure to employee who traveled until the Company can confirm traveling employee does not have COVID-19 symptoms
- Plan to monitor and respond to absenteeism
 - Implement plans to continue your essential business functions in case you experience higher than usual absenteeism
 - Cross-train employees to perform essential functions so the workplace can operate even if key employees are absent
- Remind employees about the State of Michigan's mental health free website and community resources as needed.
 - Specially-curated collection of science-backed, evidence-based guided meditations, along with at-home workouts that guide people through mindful exercises, sleep and kids content to help address rising stress and anxiety, www.headspace.com/MI
 - Call and talk with a Michigan Stay Well counselor available 24/7 if you are experiencing emotional distress related to COVID-19, 1-888-535-6136, press "8"
 - Warmline that connects Michiganders living with persistent mental health conditions to certified peer support specialists. The warmline operates 10 a.m. to 2 a.m., seven days a week at 888-PEER-753 (888-733-7753)
 - Michigan residents can have a confidential text conversation with a crisis counselor by texting the keyword RESTORE to 741741
 - Gryphon Place helping those in conflict, call 211 or visit <https://www.navigateresources.net/gryp/>

Minimizing exposure from patients

- Evaluate what business practices are needed to maintain critical operations (e.g., identify alternative suppliers, prioritize existing patients, or temporarily suspend some of your operations if needed).
- Develop protocol for social distancing practices
 - Mark 6-foot distance in areas where patients might gather/wait
 - Limit number of patients allowed into workplace
 - Minimize face to face contact (e.g., drop off system)
See Phase 2 for opening for further instructions for window appointments
- Post information on reducing the spread of COVID-19
- Evaluate options for assessing symptoms of COVID-19 and removing individuals from the workplace with symptoms
- Consider physical barriers between employees and patients/vendors.
- Make gloves and masks available to patients

Minimizing exposure from the visitors/vendors

- Talk with business partners about the Company's Plan
- If needed, identify alternate supply chains for critical goods and services. Some goods and services may be in higher demand or unavailable.
See Appendix D for list of vendors and supplies ordered from them
- If possible, limit the number of visitors to the worksite, including the trailer or office.
- Develop protocol for health screening/questionnaire for visitors/vendors

Minimizing exposure from the general public

- Be prepared to change business practices if needed to maintain critical operations (e.g., identify alternative suppliers, prioritize existing customers, or temporarily suspend some of your operations if needed).

Reference websites:

Michigan.gov FAQ: I have an employee who was diagnosed with COVID-19. What do I do next? <https://www.michigan.gov/coronavirus/0,9753,7-406-98810-524197--,00.html>

Michigan.gov FAQ: Do I need to close my business if someone that works here is diagnosed with COVID-19? <https://www.michigan.gov/coronavirus/0,9753,7-406-98810-524202--,00.html>

<https://www.michigan.gov/coronavirus/0,9753,7-406-98810-524164--,00.html>

https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fspecific-groups%2Fguidance-business-response.html

<https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html>

<https://www.osha.gov/Publications/OSHA3990.pdf>

<https://www.cdc.gov/coronavirus/2019-ncov/downloads/stop-the-spread-of-germs.pdf>

<https://www.whitehouse.gov/openingamerica/#phase-one>

Appendix A Staff Exposure Risk

Exposure Risk	Description	Role
Lower Exposure Risk	<ul style="list-style-type: none"> ● Tasks do not require contact with people known or suspected of being infected with SARS-CoV-2 ● Tasks do not have frequent close contact with the public ● Workers have minimal occupational contact with coworkers & the public 	<ul style="list-style-type: none"> ● Executive Director ● Clinical Director ● Accounting Manager ● Resource Development Director ● Office Manager ● Biller
Medium Exposure Risk	<ul style="list-style-type: none"> ● Tasks require frequent OR close contact with people who may be infected with SARS-CoV-2, but who are NOT a known/suspected COVID-19 patient ● In areas with ongoing community transmission, workers that have contact with the public (schools, high-population-density work environments, high-volume retail settings) ● In areas without ongoing community transmission, workers that have frequent contact with travelers from areas with ongoing community transmission 	<ul style="list-style-type: none"> ● Audiologists ● Audiology Assistant ● Lab Technician ● Health Screeners ● Cashiers
High Exposure Risk	<ul style="list-style-type: none"> ● Tasks with high potential for exposure to known or suspected sources of COVID-19 ● Worker could include: licensed health care professionals, medical first responders, nursing home employees, law enforcement, correctional officers, or mortuary workers 	n/a
Very High Exposure Risk	<ul style="list-style-type: none"> ● Tasks with high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures ● Workers could include: Healthcare workers (doctors, nurses, dentists, paramedics, EMTs) performing aerosol-generating procedures on known/suspected COVID-19 patients ● Healthcare or Laboratory workers collecting or handling specimens from known/suspected COVID-19 patients ● Morgue workers performing autopsies on bodies of people who are known/suspected of having COVID-19 at the time of their death 	n/a

Appendix B Use of PPE for Medium and High Risk Employees

- High risk employees must utilize N95 masks or equivalent to N95 masks approved by CDC and NIOSH when in the presence of patients.
 - The patient should also be wearing a mask or face covering.
 - If they do not come with a mask, one will be provided.
 - Employee and patient should continue social distancing during the appointment.
- High risk employees can wear the N95 mask for repeated close contact encounters with several patients without removing the mask.
 - Masks can be worn for a duration of 8-10 hours.
 - N95 masks should be removed and discarded if soiled, damaged, or hard to breathe through.
 - If the employee touches their mask immediately perform hand hygiene.
- N95 masks can be worn on a rotation. One mask can be worn up to 5 days with a 72 hour break in between each use.
 - N95 masks must be stored in a paper bag between each use.
 - The mask must be discarded after the 5th day of use or sooner if soiled, damaged, or hard to breathe.
- Employees should also utilize gloves when touching the patient and handling patient hearing aids.
 - Gloves can be used with hand sanitizer during the appointment with the same patient.
 - Gloves are to be discarded between each patient.
- Other PPE such as face shields and gowns in addition to N95 masks and gloves should be worn when removing cerumen and taking earmold impressions.

To put on N95 masks:

- First perform hand hygiene.
- Place the mask over the nose and mouth and pull straps over the head.
- One strap must be high on the head the other low behind the neck underneath hair.
- Make sure the straps are flat.
- Mold nosepiece tightly to face
- Exhale to check for leaks.
- Perform hand hygiene.

Taking mask off for reuse

- Perform hand hygiene.
- Take off straps from head; do not touch front of facemask.
- Place mask in paper bag to dry out
- To reuse: remove mask from paper bag by the straps
 - The mask should have kept its shape. Do not touch the front of the mask.
 - Perform hand hygiene after the mask is placed.

- Check for soil or damage at the end of the day. If the mask is soiled, throw away, if not it can be reused.

Cloth masks

- Cloth masks should be worn when leaving your safe zone.
- Cloth masks should be worn when talking to another employee at a 6 foot distance.
- Cloth masks should be worn when talking with a patient behind plexiglass.

To put on Cloth mask:

- Perform hand hygiene.
- Place the mask over your mouth and nose.
- Depending on the mask; place straps around your ears or tie straps over your head.
- Press the mask tightly around your nose.
- Perform hand hygiene.

Removing Cloth mask

- Perform hand hygiene.
- Do not touch the front of the mask; remove by straps.
- Place the mask in a paper bag to dry.
- Perform hand hygiene.

Removing and discarding gloves

- Grasp the outside of one glove at the wrist, do not touch your bare skin
- Peel the glove off away from your body pulling it inside out
- Hold the glove you just removed in your gloved hand
- Peel off your second glove by putting your fingers inside the glove at the wrist
- Turn the second glove inside out while pulling it away from your body, leaving the first glove inside the second.
- Dispose of the gloves safely, never reuse them
- Perform hand hygiene

Removing Gowns

- Assume gown sleeves and front are contaminated
- Unfasten gown ties, taking care that the sleeves don't contact your body when reaching for the ties
- Pull gown away from neck and shoulders, touching the inside of the gown only
- Turn the gown inside out
- Fold or roll into a bundle and discard or put in a bag for washing
- Perform hand hygiene
- Gowns can be worn all day, be careful not to touch the front or sleeves
- If you do touch the front of the gown or sleeves, use hand hygiene

Putting on face shields or goggles

- Place over face and eyes and adjust to fit

Removing face shields or goggles

- Assume the outside of the face shield or goggles are contaminated
- If you touch the outside of your face shield or goggles use hand hygiene
- Remove from the back by lifting up the headband or ear pieces
- Store in a receptacle for cleaning
- Perform hand hygiene

Cleaning face shields or goggles

- Wear gloves
- Wipe the inside of the face shield or goggles first with a wipe
- Next wipe the outside of the face shield or goggles
- Leave wet for recommended “kill time” of the product you are using
- Wipe the outside of the face shield or goggles with clean water or alcohol to remove residue
- Allow to air dry completely
- Remove your gloves and perform hand hygiene

Appendix C Recommended Products for Use

*Wear gloves when cleaning				
Product	Use	Kill time	Notes	Mix ratio
Bleach	4 teaspoons in 1 quart of water. Discard solution daily. Best to wash surface with water/detergent first.	10 minutes	Discolors plastics/fabric. Could be problem with chair arms (plastic) and around carpet surfaces, clothing splash. Could be corrosive to metal - not safe for sinks. Best to rinse after on countertops.	1/3 C per gallon of water
Hydrogen peroxide	Household (3%). Put in spray bottle.	30 seconds, 1 minute	Safe for metal, can bleach/discolor fabrics. Could be a problem with chair fabric, and around carpeted surfaces, clothing splash. Don't have to wipe off.	
Alcohol	70% alcohol. Put in spray bottle. Best to wash surface with water/detergent first.	1 minute, 5 minutes	Safe for all surfaces but could discolor plastics. Could be a problem with chair arms (plastic).	
Clorox wipes		4 minutes		
Lysol wipes		10 minutes		
Audiologists Choice Ultrasonic Disinfectant/cleaner concentrate		10 minutes	Used in ultrasonic cleaner in the lab (probe tips, earmolds, bionix tips), allow to agitate in the cleaner for a full 10 minutes before moving items to Wavicide	
Audio Wipes			Wipe surface and allow to air dry. Rinsing not necessary	
Micro Ban All Purpose Cleaner		5 minutes	Spray on, allow to sit for 5 minutes and then wipe away using paper towel	
Other Appropriate Products Not in Supply at CBHC				
Cavicide		2 minutes		
SaniCloth AF3 Alcohol Free Disinfectant disposable wipe		3 minutes	Use for hearing aids and any audiology equipment	
Oxivir Wipes	surface wipes	1 minute	Oxivir Disinfectant Cleaners can be safely used on most common healthcare surfaces. They are compatible with stainless steel, chrome,	

			vinyl, nylon fabrics, laminated surfaces, glass, rubber and hard and flexible plastics such as polypropylene, polyurethane, polyethylene, PVC acrylic, fiberglass and polycarbonate. Oxivir Disinfectant Cleaners are not recommended to be used on brass, marble, copper or extremely soft plastics.	
Clorox hydrogen peroxide germicidal cleaner (Clorox healthcare)		1 minute		
Lysol all purpose cleaner		2 minutes		
Lysol brand clean and fresh multi surface cleaner		3 minutes		
Clorox commercial solutions, Clorox Pro		1-10 minutes different products		

Best practice protocol: Pre cleaning, disinfecting (dwell time), wiping clean and rinsing with water

Areas/items that need to be cleaned/disinfected		Frequency
Patient waiting area	Door handles, chairs, counter, end tables	After each use
Front office	Doorknobs, light switches, chair arms, counters, desktop, pens, clipboards, keyboard, mouse, phone, headsets, copier keypad, credit card machine	Daily
Audiologist office	Doorknobs, light switches, chair arms, desktop, pens, keyboard, mouse, phone, laptop outer surface and keyboard, hearing aid programmers, stool, sink	Daily and after each use by/on patient
Testing booths/testing equipment	Door handles, light switches, chair arms, otoscope handle, headphones/inserts/bone conduction, response button, toys, computer/audiometer/tymp keyboards	After each use
Breakroom	Doorknobs, light switches, table top, counters, refrigerator handle, microwave handle, coffee pot handle/button, water dispenser knobs, sink handles	Daily

Conference room	Doorknobs, light switches, tabletop, counters, chair arms, refrigerator handle, microwave handle, sink handles	Between uses
Restrooms	Door handles, light switches, sink handles, soap dispenser, toilet handle	Daily
Lab	Doorknobs, light switches, chair arms, counters, cabinet and drawer handles, phone, copier keypad, sink handles, soap dispenser, hearing aid test box handles, keypads, couplers	Daily and between uses
Barriers	Both sides of glass or plastic sheet	At minimum, daily

Appendix D Vendors with Critical Goods

Vendor	Contact Info & Account #	Product
Oaktree Products, Inc. 610 Spirit Valley East Drive Chesterfield MO 63005	Phone: 800-347-1960 Fax: 866-333-6158 Customer ID: 17100	Gloves Audio Wipes (large and small) Audio cleaning solution Masks
Westone P. O. Box 15100 Colorado Springs CO 80935	Phone: 800-525-5071 FAX: 719-540-9183 Account # K00437	Wavecide