



COVID-19 Preparedness and Response Plan

Policy Statement

In light of the present COVID-19 pandemic, LifeWays Community Mental Health (“Agency”) has instituted the following COVID-19 Preparedness and Response Plan to ensure the health, safety and wellbeing of its employees, consumers and contract providers. As state and federal COVID-19 restrictions are relaxed, employees will be called back to return to regular onsite work. The following policies and procedures have been prepared in anticipation of this return to work and will be adopted and instituted effective immediately.

In light of the rapid state and federal developments concerning COVID-19, the Agency will continue to update employees as new information becomes available and may modify this policy at any time. Transitioning from Tier to Tier may become a fluid process based on the COVID-19 prevalence in the community, based on local health data.

Scope: This COVID-19 Preparedness and Response Plan applies to all employees and contract providers working in any LifeWays building and all consumers served.

Reopening Schedule

The Agency will follow a four-tiered phase for returning to full operations; however, this is an ever-changing situation. We will be following advice from the Centers for Disease Control and Prevention (CDC), county health officials, and the Michigan Department of Health and Human Services (MDHHS). Alterations may need to be made to this plan due to recommendations or orders based on local and state conditions.

Tier 4

A. Tier 4: Evidence of Widespread County Transmission and Stay Home, Stay Safe Order in Place = Essential Services only on site; all other services occurring from home via telehealth.

1. Governor Gretchen Whitmer’s Executive Order to “Stay Home, Stay Safe” is active. LifeWays will provide essential services only, due to confirmed widespread community transmission of COVID-19, or staff/consumer exposure. LifeWays’ CEO and executive team will make the determination as to employee work requirements.
2. Limited screening protocols and strict social distancing requirements are in place, telehealth codes remain active, and group meetings are to be held via a video meeting product, such as Zoom or Microsoft Teams (“video”).

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3. LifeWays will continue to provide all essential services at both locations. Essential services at this level will include CLS supports, needed for health and safety, emergency services, psychiatric evaluations for new patients, injectable medications that are deemed necessary by the prescribing psychiatrist, medication reviews and crisis services for individuals that do not have technology capabilities. All other services, such as Access Services, Psychiatric Services, Crisis Services, Outpatient Therapy, Case Management/Supports Coordination, Children's Home-based, Private Duty Nursing, Personal Care, and ABA will continue to occur remotely via telephone or telehealth contact.
4. All consumers and staff working at both locations will follow COVID-19 screening protocols and have available personal protective equipment (PPE).
5. Emergency Services pre-admission screenings will be done via video or other telehealth technologies.
6. Employees who are not performing critical or priority functions will work from home performing telephone contacts and other job duties as assigned by their supervisor.

B. Goal: Maintain current level of services by alternative mode.

Tier 3

- A. **Tier 3: Sustained decrease in the number of positive cases in the county for 9 of the last 10 days or any lifting of the Stay Home, Stay Safe Executive Order = Adding minimal staff on-site as well program on-site activities, including face-to-face contacts only for those deemed appropriate.** (Executive Orders supersede any local trends or prevalence of positive cases.)
 1. Screening protocols continue, social distancing requirements continue (assumes adequate PPE supplies to cover expansion of face-to-face services), telehealth codes remain active, group meetings continue to be held via video.
 2. Begin adding in some face-to-face services for those individuals who are requesting this as well as those who are experiencing psychiatric decompensation or requesting a service. A review will occur to determine appropriate PPE necessity for face-to-face versus Telehealth for service provision. This includes emergency services, Crisis Services, Access Services, Outpatient Therapy, Children's Home-based, Peer Services, CSM/SC, Private Duty Nursing, Personal Care, ABA, and ACT services. These face-to-face services will occur with the approval of the treatment team.
 3. Administrative department staff maintain remote or begin partial remote as space and PPE allow.

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4. All staff will be required to wear a mask when in the office and at all home visits. Masks will also be available to provide to consumers. No staff will go into a face-to-face contact without first completing a health screening.
5. Screenings will occur curbside and once cleared the individual will be escorted to the lobby or other waiting area.
6. All staff will be required to participate in identified training regarding PPE and COVID-19 issues, with documented completion prior to returning back on site.

B. Goal: Resume clinical services that are needed but cannot be adequately completed remotely. Potentially resume some priority administrative tasks or projects that cannot be adequately completed remotely.

1. Focus on particular services that have not been conducive to telehealth but are needed as determined by the treatment team.
2. Consider more “partial” remote rather than full remote. For example, see consumers in a community-based location or large conference space where social distancing can be maintained, but do paperwork, staff meetings, etc. at home or stagger office times.
3. Continue social distancing practices.
4. Continue employee/consumer screening.
5. Continue personal hygiene practices.

Tier 2

A. Tier 2: No new cases in the county for the last 19 of 20 days and/or the ability to test and/or trace in place for all county residents = Increase in amount of staff on-site and increase in the amount of face-to-face activity with use of PPE and Precautions.

1. Evidence that COVID-19 positive cases have maintained a decrease trend in both new cases and deaths, and the Governor’s Executive Order to “Stay Home, Stay Safe” continues to expand the business that can operate face-to-face.
2. Screening protocols continue, social distancing requirements continue, (assumes adequate PPE supplies to cover expansion of face-to-face services), telehealth codes start becoming limited, group meetings continue to be held via video.
3. Each department will have a rotating schedule to allow for staff to be on-site at LifeWays buildings. For areas that have more than one desk in a large area and are not able to have six feet distance between them when all are in-house, no more than half of the staff will be permitted to be in each of these areas at a time to ensure following the social distance guidelines of six feet apart are followed.

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4. Any staff member who has declared to fall under the “High Risk” category (via HR survey) shall coordinate their work situation with their supervisor and HR.
5. Injections will continue with needed face-to-face activities with use of PPE.
6. Emergency Services will continue providing face-to-face pre-screens for inpatient placement with use of PPE, dependent on hospital policies for outside staff to present in person
7. Psychiatric evaluations for new patients will continue with use of PPE.
8. Home-based, Outpatient Therapy, Case Management/Supports Coordination, Peer Services, ACT, ABA, Psychiatric Services, Crisis Services and Access Services will begin adding face-to-face visits with those deemed most in need as determined by staff, supervisor and department directors.
9. All face-to-face activity will occur after screening and with use of PPE as well as ability to abide by social distancing rules.

B. Goal: Resume face-to-face clinical services on-site or in the community that have telehealth codes expiring and/or as required by MDHHS.

1. Focus on resuming face-to-face services for those telehealth codes that are expiring while maintaining telehealth wherever possible.
2. Continue partial remote as needed due to adequate space and PPE allow and implement desk distancing.
3. Administrative departments/operations staff can begin transition as space and PPE supplies allow.
4. Continue employee and consumer screening.
5. Continue social distancing practices.
6. Continue personal hygiene practices.

Tier 1

A. Tier 1: No active spread for 30 days or a vaccine has been made available for 30 days = Preventive Activities/Operating Normally with precautions

1. Givens: Resume all operations with employee and contract provider training/education, prevention, screening, ongoing use of social distancing and PPE as recommended by CDC, local health departments, and MDHHS.
2. All staff will receive ongoing updates and education on the following:
 - a. Symptoms to be aware of as well as preventive measures individuals should take to help keep safe from the virus in the form of fact sheets from CDC.
 - b. A request for consumers to be mindful of potential symptoms that may signal COVID-19 infection such as fever, cough, runny nose or shortness of breath and remain home if these symptoms are present.
 - c. A request for consumers to avoid presenting to LifeWays if they or a household member has had a fever within the past 72 hours.

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3. It is expected that staff will call ahead before presenting for any scheduled home visits and ask if anyone has had a fever or is ill within the home. If illness is reported, staff has been instructed to reschedule the home-visit until all members of the home have been fever-free for 72 hours (in accordance with CDC Guidelines).
4. Staff may utilize telehealth for those services codes approved by the state to provide care.

B. Goal: Resume full operations with ongoing screening, prevention, and social distancing.

1. Last wave of return to full operations.
2. If telehealth codes still apply consider what partial remote options continuing.
3. Continue large group meetings via video.
4. Focus on education, prevention efforts.
5. Implement personal hygiene practices.
6. Implement employee and consumer screening practices.
7. Implement social distancing practices when possible.

Employee and Visitor Screenings

Prior to entering any LifeWays property:

Visitors – All visitors will be subject to screening procedures per CDC recommendations and in accordance with applicable local, state and federal requirements. If a visitor answers affirmatively to any of the screening questions, they will not be permitted to enter the facility.

Consumers – If a consumer answers affirmatively to any of the screening questions and is in need of services (examples include an injection or crisis intervention), then they will be escorted directly to a Clean Room. The clean room will be a designated space for consumers in need of services but exhibiting symptoms or are confirmed positive. Only the required staff needed to perform the service will enter the room. PPE will include a fitted N95 mask, face shield, gloves and gown. Immediately upon the consumer exiting, the Clean Room will be wiped down.

Employees – Employees will be pre-screening at home and are required to sign self-attestation form (LifeWays COVID-19 Workplace Health Screening Form) upon entering the building indicating they are symptom free. If an employee answers affirmatively to any of the screening questions, the employee is not permitted on the worksite and must:

- Self-isolate at home for 14 days.

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- Contact their medical provider within 24 hours if they have symptoms or have had close contact with an individual for evaluation. If given a probable diagnosis or test positive, call their local health department to ensure the health department is aware.
 - o Jackson County Health Department: (517) 788-4420, Opt. 9
 - o Branch-Hillsdale-St. Joseph Community Health Agency: 517-437-7395
- Notify their Supervisor and the Human Resources Department.

Should an employee either be identified with a confirmed case of COVID-19, or as a potential positive case, Human Resources will within 24 hours notify both:

1. The local public health department; and
2. Any coworkers, contractors, or suppliers who may have come into contact with the person with a confirmed case.

Return to Work

Return to work will be based on CDC Guidelines. Those strategies include either symptom-based strategy or test-based strategy :

- Symptom-based Strategy: At least 3 days (72 hours) have passed since recovery defined as resolution of fever without the use of fever-reducing medications and improvement in respiratory symptoms (e.g., cough, shortness of breath); and, at least 10 days have passed since symptoms first appeared.
- Test-based Strategy: Symptom-based Strategy **and** tests negative twice, a minimum of 24 hours apart, for COVID-19.

Asymptomatic (no symptoms, but test positive): tests negative twice, a minimum of 24 hours apart, for COVID-19.

Personal Protective Equipment Plan

Level A | Administrative – low level Risk, no direct consumer contact | Cloth Mask or Scarf

Level B | Administrative – minimal level Risk, brief consumer contact (front desk staff) | Cloth Mask or Scarf

Level C | Clinical – seeing screened consumers in office and at their homes but can maintain 6 feet | N95 mask and gloves

Level D | Clinical – close contact (i.e., injections) | N95 mask, gloves, gown

Level E | Clinical – known positive or symptomatic and consumer must be seen (telehealth is not an option) | Fitted N95 mask, face shield, gloves, gown

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If cloth masks are unavailable, a 7-day supply of surgical masks with brown paper bags will be provided with the expectation that the used mask be placed in a brown paper bag and rotated every 7 days.

N95 masks can be used for an entire day and placed in a brown paper bag at end of the day. Rotate every 3 days.

Level E – N95 masks must not be touched or laid on a surface after a known contact with someone who is positive. It must immediately be placed in a brown paper bag for 3 days.

COVID-19 Testing

The Agency may require COVID-19 testing of employees. Testing is performed by Henry Ford Allegiance Occupational Health (100 E Michigan Ave, Ste 101, phone 517-205-7766). A phone call by the employee prior to testing is requested so that HFAH can monitor traffic flow.

Social Distancing in the Workplace

The Agency will work to ensure that social distancing practices, to the extent feasible, are maintained in the workplace. These practices will include:

- Rearranging in-office furniture to ensure social distancing.
- Rotating employees' onsite schedules, i.e., one set of staff onsite one week, one set the next week with a weekend break of office use.
- Assigning dedicated entry point(s) for all employees to reduce congestion at the main entrance.
- Providing visual indicators of appropriate spacing for employees outside the building in case of congestion and visual cues to guide movement and activity in the building (i.e., restricting elevator capacity with markings, locking conference rooms).
- Permitting telework when possible, as determined in the sole discretion of the Agency.
- Holding meetings virtually.
- Limiting in-person events and large gatherings (to the extent feasible, hosting the events virtually or rescheduling).
- Increasing physical space between employees and visitors in the workplace.
- Limiting the number of visitors by conducting business virtually.
- Limiting waiting-area occupancy to the number of individuals who can be present while staying six feet away from one another and ask patients, if possible, to wait in cars for their appointment to be called.

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- Marking waiting rooms to enable six feet of social distancing (e.g., by placing X's on the ground and/or removing seats in the waiting room).
- Enabling contactless sign-in (e.g., sign in on phone app) as soon as practicable.
- Staggering break and lunch times.
- Discouraging social practices that violate social distancing rules, such as handshakes.

In addition, during the workday, employees are encouraged to:

- Avoid meeting people face-to-face. Employees are encouraged to use the telephone, online conferencing, e-mail or instant messaging to conduct business as much as possible, even when participants are in the same building.
- If a face-to-face meeting is unavoidable, minimize the meeting time, choose a large meeting room and sit at least six feet from each other if possible; avoid person-to-person contact such as shaking hands.
- Avoid any unnecessary travel and cancel or postpone nonessential meetings, gatherings, workshops and training sessions.
- Do not congregate in work rooms, pantries, copier rooms or other areas where people socialize.
- Bring lunch and eat at your desk or away from others (avoid lunchrooms and crowded restaurants).
- Encourage members and others to request information via phone and e-mail in order to minimize person-to-person contact. Have information ready for fast pick-up or delivery.

Outside Activities

Employees are reminded to comply with all state and federal mandates regarding stay home restrictions, gatherings, places of public accommodation, PPE, etc.

LifeWays Safety Precautions

We are augmenting our Agency sanitation procedures in order to provide more frequent and thorough cleaning and sanitation of the building and workplaces. The Agency will ensure a clean workplace, including the regular cleaning of objects and areas that are frequently used, such as bathrooms, break rooms, conference rooms, door handles and railings. The executive team will monitor and coordinate events around an infectious disease outbreak, as well as to create work rules that may be implemented to promote safety through infection control. In addition, the Agency will designate one or more worksite supervisors to implement, monitor, and report on the COVID-19 control strategies and to initiate the response plan for dealing with a confirmed infection in the workplace.

Additional measures will include, but are not limited to, the following practices:

- Maintaining flexibility with employees' breaks to allow for frequent handwashing.
- Implementing additional sanitation measures for the facility, especially in common areas and for frequently touched surfaces or shared equipment.
- Covered trash cans will be replaced, where possible, with touchless (foot lever) trash cans.
- Requiring employees to disinfect common surfaces following use as appropriate (for example, microwaves).
- Providing hand sanitizer, disinfecting wipes, and proper disposal in all common areas and at workstations where employees cannot leave to wash their hands between interactions with the public.
- Requiring employees to use masks or approved facial coverings and gloves (and providing them if able).
- Ensuring that employees are trained on proper use of PPE.
- Coordinating with facility maintenance to increase air exchanges in facilities and installing high-efficiency air filters.
- Add a temporary plexiglass screen in front lobby for the customer services staff working directly with clients.
- Add special hours for highly vulnerable patients, including the elderly and those with chronic conditions.
- Require patients to wear a face covering when in the facility, except as necessary for identification or to facilitate an examination or procedure.

Employee Safety Precautions

Per guidance from the Center for Disease Control and Prevention (CDC) and the Occupational Safety and Health Administration (OSHA), all employees must comply with the following safety standards.

1. Wash Hands Regularly

The CDC has advised that keeping hands clean is one of the most important steps to avoid the spread of germs. All employees must adhere to the following policy for mandatory handwashing with soap and hot water for **at least 20 seconds**.

- Before entering the office for the first time in the morning and after being outside of the office and returning to the office at any point in the day.
- After using the bathroom.
- Before, during and after food preparation.
- Before eating food.
- After blowing their nose, coughing or sneezing.
- After caring for someone who is sick or after changing a child's diaper.
- After handling pets or other animals or their food and waste.

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- After touching garbage.

Employees should use an alcohol-based hand sanitizer if soap and hot water are not available. The CDC has advised that alcohol-based hand sanitizers should contain 60 percent to 95 percent alcohol, but washing with soap and hot water is preferable, particularly if hands are visibly dirty.

For more information, see <https://www.cdc.gov/handwashing/index.html>.

2. Practice Sneezing and Coughing Etiquette

To help prevent the spread of germs, all employees must adhere to the following mandatory policy for managing sneezes and coughs.

- Never cough or sneeze into your hands.
- Covering your mouth and nose with a tissue or your own upper sleeve when you cough or sneeze.
- Putting used tissue in a wastebasket.
- Washing hands after coughing or sneezing.

3. Clean Your Workstation Regularly

At the end of the workday and between office visitors/clients, each employee must clean all frequently touched surfaces in their workspace, such as keyboards, keyboard palm pads, mice, mice palm pads, remote controls, desks, countertops, file cabinet pulls, chair arm rests, and doorknobs. Create a checklist to follow each time you clean an area. Front desk staff clean between guests.

The CDC recommends using the cleaning agents that are usually used to clean work surfaces, doorknobs and countertops and to follow the directions on the label (such as disinfecting sprays and wipes). The Facilities Department will provide approved cleaning agents.

4. Required PPE

Per recent state and federal requirements, an employer may require employees to wear personal protective equipment (PPE) (for example, masks and gloves) in order to prevent the spread of COVID-19 in the workplace.

Employees who require a reasonable accommodation to the PPE requirements under the Americans with Disabilities Act (ADA) (e.g., non-latex gloves, modified face masks for interpreters or others who communicate with an employee who uses lip reading,), or a religious accommodation under Title VII (such as modified equipment due to religious garb), should contact the Human Resources department with their requested accommodation.

Consumer Interactions

Employees are required to familiarize themselves with the Interim CDC Guidance on Handling Non-COVID-19 Public Health Activities that Require Face-to-Face Interaction with Clients in the Clinic and Field in the Current COVID-19 Pandemic: <https://www.cdc.gov/coronavirus/2019-ncov/hcp/non-covid-19-client-interaction.html>

Telework Arrangements

Telework requests will be handled on a case-by-case basis. While not all positions will be eligible, all requests for temporary telecommuting should be submitted to Human Resources for consideration.

Employee Training

Prior to returning to work, all staff are required to complete COVID – related Relias trainings. Supervisors should ensure their staff have completed these trainings prior to scheduling them to work onsite:

1. Hand Hygiene: The Basics
2. Infection Control: Airborne Precautions
3. Personal Protective Equipment
4. Transmission – Based Precautions

Staying Home When Ill

Many times, with the best of intentions, employees report to work even though they feel ill. LifeWays provides paid time off (PTO) and other benefits to compensate employees who are unable to work due to illness. Please see Human Resources for more information regarding the COVID-19 PTO Policy and other available PTO.

During an infectious disease outbreak, it is critical that employees do not report to work while they are ill and/or experiencing the following symptoms: fever, cough, sore throat, runny or stuffy nose, body aches, headache, chills and fatigue. Currently, the Centers for Disease Control and Prevention recommends that people with an infectious illness such as the flu remain at home until at least three days after they are free of fever (100 degrees F or 37.8 degrees C) or signs of a fever without the use of fever-reducing medications. Employees who report to work ill will be sent home in accordance with these health guidelines.



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Concurrent Use of PTO and Coordination of Benefits

Employees taking leave during related to COVID-19 may utilize accrued and unearned PTO or any applicable short-term disability benefits available. Please see Human Resources for more information regarding available PTO and other benefits.

Requests for Medical Information and/or Documentation

If you are out sick or show symptoms of being ill, it may become necessary to request information from you and/or your health care provider. In general, we would request medical information to confirm your need to be absent, to show whether and how an absence relates to the infection, and to know that it is appropriate for you to return to work. As always, we expect and appreciate your cooperation if and when medical information is sought.

Confidentiality of Medical Information

LifeWays' policy is to treat any medical information as a confidential medical record. In furtherance of this policy, any disclosure of medical information is in limited circumstances with supervisors, managers, first aid and safety personnel, and government officials as required by law.

Policy Non-Compliance

In the event that an employee of the Agency does not comply with the above stated policies and procedures, the Agency will, at its sole and absolute discretion, require that employee to vacate the physical premises for a period of time as determined solely by the Agency. In addition, non-compliance may result in discipline, up to and including termination of employment.

Declared All-Clear

The Agency may, at its sole and absolute discretion, using the best information available to it at the time based on state and federal guidance, declare an all-clear and suspend these COVID-19 related policies. At such a time, mandatory compliance with these policies and procedures will cease until and unless the Agency determines it necessary to reinstate them.

THE AGENCY MAY UNILATERALLY MODIFY, CANCEL OR PROVIDE EXCEPTIONS TO THIS POLICY, IN ITS SOLE AND ABSOLUTE DISCRETION, AT ANY TIME.

Appendix A

Additional Resources

- Additional information regarding the recent COVID-19 outbreak, its effect on the health care industry, and other safety precautions can be found below.
- Return to Work for Healthcare Personnel with Confirmed or Suspected COVID-19: <https://www.cdc.gov/coronavirus/2019-ncov/hcp/return-to-work.html>
- Interim CDC Guidance on Handling Non-COVID-19 Public Health Activities that Require Face-to-Face Interaction with Clients in the Clinic and Field in the Current COVID-19 Pandemic: <https://www.cdc.gov/coronavirus/2019-ncov/hcp/non-covid-19-client-interaction.html>
- CDC Training for Healthcare Professionals: <https://www.cdc.gov/coronavirus/2019-ncov/hcp/training.html>
- [BHDHA Repository for all COVID-19 related guidance and policy communications](#)
- [Supporting the Emotional Health of Behavioral Health Workers](#)
- [Jackson County Chamber COVID-19 Information Center](#)
- [Community Mental Health Association COVID-19 Resource Center](#)
- [Executive Order 2020-77 – Stay Home, Stay Safe](#)
- [CDC Implementation of Mitigation Strategies for Communities with Local COVID-19 Transmissions \(3/13/20\)](#)
- [Governor Whitmer Orders Temporary Prohibition on Large Assemblages and Events](#)
- [Michigan Coronavirus Resources for Employers & Workers](#)
- [CDC COVID-19 Information](#)
- [Michigan COVID-19 Information](#)
- [SAMHSA Taking Care of Your Behavioral Health \[Poster\]](#)
- [Talking with Children: Tips for Caregivers, Parents, and Teachers During Infectious Disease Outbreaks \[Poster\]](#)
- [Coping With Stress During Infectious Disease Outbreaks \[Poster\]](#)
- [Coping with a Disaster or Traumatic Event \[Poster\]](#)
- [Wash Your Hands \[Poster\]](#)
- [What to do if you are sick with coronavirus disease 2019 \(COVID-19\) \[Poster\]](#)
- [Share Facts About COVID-19 \[Poster\]](#)[Stop the Spread of Germs \[Poster\]](#)