



2019 NOVEL CORONAVIRUS (COVID-19/2019-nCoV) POLICY: OPWDD Program Facility Reopening Safety Plan

Effective: July 22, 2020

Revised July 29, 2020 to reflect change to temperature requirement for screening

PURPOSE

To establish a safety plan for the transition of Gateway Counseling Center’s Group Day Habilitation (GDH) and Supplemental Group Day Habilitation (SGDH) programs from telehealth services back to on site/in person services. This plan outlines measures that will be implemented in order to prevent the spread of the COVID-19 in compliance with guidance set forth by the New York State Office For People With Developmental Disabilities (OPWDD), New York State Department of Health (DOH), the Centers for Disease Control and Preventions (CDC), Environmental Protection Agency (EPA), the U.S. Department of Health and Human Services (HHS), and the National Institutes of Health (NIH) while meeting the minimum standards of the Americans with Disabilities Act (ADA).

This plan applies to all Gateway facilities providing direct care services to OPWDD individuals.

PLEASE NOTE

We view our safety plan as a dynamic document that will be updated regularly with the advent of new guidance from NYS DOH, NYS OPWDD and the CDC. It is not a static plan and will be reviewed and adjusted as necessary to ensure adherence to guidance from regulatory authorities and to provide the best possible environment and services to our individuals and our staff. Please visit our

[Coronavirus Updates Page
\(bit.ly/gcccovid19\)](https://bit.ly/gcccovid19)

for the most up to date version of information found in this document. This will include a gallery of images showcasing our new safety and screening equipment plus new signage posted at all of our facilities to adhere to all social distancing and sanitary guidelines.

ENTRANCE INTO PROGRAM FACILITIES

Entrance into program facilities will be restricted to essential staff responsible for the direct provision of services and essential visitors. OPWDD defines essential visitors as “anyone necessary to the care and treatment within the facility or anyone necessary to the functioning of the site.”
(Frequently Asked Questions: Interim Guidance Regarding Reopening of Day Services)

Essential visitors at Gateway’s program facilities include:

- Contracted cleaning company workers that will clean/disinfect facilities during the program day and/or at the end of the program day.
- Director of Physical Plant Operations.
- C-Level Officers and/or administrative staff visiting the program facilities to ensure all safety protocols are being followed and operations are running in compliance with all applicable regulations.

Gateway will continue to work with CCOs to ensure the continuation of teleservices provided by GCC DSPs for as long as OPWDD permits.

SCREENING

Temperature Check:

Staff and Essential Visitors:

- Gateway asks that all Gateway staff check their own temperature prior to entering any of Gateway's facilities.
 - **If your measured temperature is 100 °F or higher, do not enter the building. Call your supervisor to report your recorded temperature and return home.**
- Upon arrival at any of Gateway's program facilities, all Gateway staff and essential visitors will have their temperature measured with a non-contact thermometer in the designated screening area at the facility entrances. Please see an [example photo](#) on our web site (bit.ly/gccovid19) of non-contact temperature screening kiosks at the entrance to all our facilities.
 - If the measured temperature is 100.4 °F or higher, the person will be denied entry into the facility.
 - Staff that are sent home will be reported to Human Resources, the Medical Department, and Incident Management.

Individuals:

- Individuals transported to program by Gateway staff will have their temperature measured with a non-contact thermometer prior to entering the vehicle. If the measured temperature is 100.4 °F or higher, the staff will inform their parent/advocate/residence staff that the individual must stay home.
- All individuals' temperature will be measured upon arrival at Gateway's program facilities. If the measured temperature is 100.4 °F or higher:
 - The individual will be escorted to the designated quarantine room.
 - A supervisor will recheck the individual's temperature. If the temperature is confirmed to be 100.4 °F or higher, that individual will not participate in program activities and will return home.
 - Individuals sent home will be reported to the Medical Department, Incident Management, and C-level Officers.

Health Screening Questionnaire:

- Prior to entering the facility, all Gateway staff and essential visitors will be screened by a designated staff. In addition to the temperature check, staff and essential visitors will be asked questions about:
 1. COVID-19 symptoms in the past 14 days.
 2. Positive COVID-19 test in the past 14 days.
 3. Close contact with confirmed or suspected COVID-19 case in the past 14 days.
 4. Travel outside of New York State within the past 14 days.
- Screening of individuals will be based on the level of functioning of individual, level of communication, and information provided by their circle of support. Staff will maintain regular contact with residences/families/advocates regarding individuals' well-being, contact with confirmed/suspected COVID-19 cases, and travel outside of New York State.
- Questionnaire responses will be reviewed and documented daily by a designated staff member.
- Staff should take the following actions related to COVID-19 symptoms, contact, and travel to restricted areas.
 - If a person has COVID-19 symptoms **AND EITHER** tests positive for COVID-19 **OR** did not receive a test, the individual may only return after completing at least **14 days** of self-quarantine.
 - If a person does **NOT** have COVID-19 symptoms **BUT** tests positive for COVID-19, the individual may only return after completing at least **14 days** of self-quarantine.
 - If a person has had close contact with a person with COVID-19 for a prolonged period of time **AND** is symptomatic, the individual should follow the above protocol for a positive case (i.e. **14 days** of self-quarantine).
 - If a person has had close contact with a person with COVID-19 for a prolonged period of time **AND** is **NOT** symptomatic, the individual must complete a **14-day** self-quarantine.
 - If a person has traveled to any states or other locations on the NYS Travel Advisory list, the individual must complete a **14-day** self-quarantine from the date of their return to NY.
- An individual exhibiting signs or symptoms of COVID-19 upon arrival to a program facility will not be allowed to enter the program building. They will be required to return home until they are fever free for 72 hours without the use of fever-reducing medications (i.e. Advil, Tylenol).
- In the event an individual, staff or anyone they reside with are placed on quarantine or isolation, the responsible party (i.e. self, guardian, residence manager etc.) must notify the

day program immediately and the individual must suspend attending day program until they are medically cleared to return to work/program.

- Each program location will maintain a log of every person, including workers, individuals and visitors, who may have close contact with others in the GDH/SGDH program, such that all contacts may be identified, traced and notified in the event a worker or individual is diagnosed with COVID-19.
- Staff are required to report if any of their answers to any of the questionnaire questions change- i.e. if they begin to experience symptoms while at work **or** if they are notified/discover that they have been in contact with a person who is positive for COVID-19 within the past 14 days.
- **Staff who are sick must stay home.**
- **If either a staff or individual begin to experience COVID-19 symptoms while at the program facility, the staff or individual must be taken to the designated quarantine room immediately and sent home as soon as possible.**

New York State Travel Advisory:

- On June 25, 2020, NYS Governor Andrew Cuomo issued Executive Order 205, requiring the NYS Commissioner of Health to issue a travel advisory requiring all travelers coming from states with significant rates of transmission of COVID-19 to quarantine for a 14-day period. A current list of restricted states is posted on the GCC website and at the entrance of each facility.
- All GCC staff are required to report any travel outside of New York State in writing to their supervisor and the Human Resources Department.
- Any staff member that travels to any of the states listed on the NYS Travel Advisory restriction list must self-quarantine at home for 14 days from the date of their return to New York State.
- Individuals, their residences, and/or families will be required to inform GCC of any travel outside of New York State prior to the individual going to the program facility.
- Any individual that travels to any of the states listed on the NYS Travel Advisory restriction list must self-quarantine at home for 14 days from the date of their return to New York State. Individuals may receive telehealth services while self-quarantining for as long as federal and state regulatory agencies permit.

Designated Screeners:

- Supervisors/Program Directors will designate staff to be screeners.
- Staff designated as screeners will be trained by GCC's medical staff.
- Screeners will be provided with protective face shields that must be worn while screening staff, individuals, and essential visitors entering the facility.

PHYSICAL DISTANCING

Inside the Facility:

- Program facility and group room capacity will be limited to the number of individuals and required staff which ensures at least six feet of physical distance is maintained among individuals and staff, unless safety of the core activity requires a shorter distance or an individual's treatment plan requires that closer contact be maintained with a staff member.
- No group room should have more than 15 individuals assigned to it.
- All staff, individuals, and essential visitors must do their best to maintain a distance of at least 6 feet between themselves and other people at all times while in Gateway's facilities.
- All staff must wear an acceptable face covering (covering the nose and mouth) at all times at work, consistent with all current Executive Orders and OPWDD guidelines, unless medically contradicted.
- Individuals receiving services must wear face coverings, if they can medically tolerate one, whenever social distancing cannot be achieved.
- Group rooms will include the same grouping of individuals with the same staff each day to the extent possible.
- Individuals who reside together and are transported to program together will be assigned to the same groups to the extent possible in order to reduce intermingling.
- To the extent possible, a staffing plan will be maintained that does not require that staff float between group rooms or groups of individuals.
- Activities that require little to no physical contact and that do not rely on shared equipment will be prioritized to the extent possible.
- Additional efforts to reduce interpersonal contact and congregation in the facility, include but are not limited to the following:
 - Individual schedules may be adjusted/staggered- alternating between onsite/face-to-face services and telehealth services for as long as OPWDD allows in order to reduce group sizes.
 - Staff work schedules will be adjusted/staggered when possible.
 - Staff will be encouraged to punch in and out using their computer or smartphone instead of the kiosk.
 - Distance markers will be used to denote 6 feet in commonly used areas (i.e. reception/screening areas).
 - One-way arrows will be used to reduce bidirectional foot traffic where necessary.
 - Staff meetings will be held via teleconference as much as possible.

- Staff are to maintain supplies independent of their coworkers (i.e. do not share pens, pencils, staplers etc.).
- Physical barriers will be put in place where possible in areas where physical distancing is not feasible. Please see [example photo 1](#) and [example photo 2](#) on our web site (bit.ly/gcccovid19) of physical barriers.
- Individuals will be served meals in their classrooms.

Expectations for Staff Outside of the Office:

- All Gateway staff are expected to adhere to social distancing guidelines outside of the office, which means avoiding crowded areas and gatherings to the best of staff ability.
- If you do attend a crowded gathering within two (2) weeks of the day you are scheduled to work, you must inform your supervisor and the Human Resources Department in writing and you may be required to self-quarantine for at least two (2) weeks.
- Staff will be expected to keep a record of places they go and people that are around them who they know in order to provide such information to contact tracers should staff contract COVID-19. Staff will not be required to submit contact and movement information to GCC, but must maintain and up-to-date log in case they need to provide it to contact tracers.

PROTECTIVE EQUIPMENT

Face Coverings:

- All staff, individuals, and essential visitors are required to wear face coverings upon entering any GCC facility.
- Acceptable face coverings include but are not limited to cloth (i.e. homemade sewn, quick cut, bandana), surgical masks, and face shields.
- Gateway will provide disposable face masks to any staff member, individual, or essential visitor who does not have one or who needs a replacement mask during the day.
- Disposable face masks must not be reused.
- Reusable cloth masks must be washed between shifts.
- Sharing masks or face coverings is prohibited.

Additional PPE:

- Gateway will have the following PPE available for staff:
 - Protective face shields- Staff assigned face shields are responsible for their daily sanitizing.
 - Gloves
 - Gowns

HYGIENE, CLEANING, AND DISINFECTING

Practice Everyday Preventive Actions:

- Avoid touching your eyes, nose, or mouth.
- Proper hand hygiene is an important infection control measure. Wash your hands regularly with soap and water for at least 20 seconds or use an alcohol-based hand sanitizer containing at least 60% alcohol.
- **All staff and individuals are required to perform hand hygiene immediately upon entering the program facility and throughout the day.**
- Tissues, masks, and hand sanitizer will be made readily available.
- Key times to clean hands include:
 - Before, during, and after preparing food
 - Before eating food
 - Before and after using the toilet
 - After blowing your nose, coughing, or sneezing
- Additional times on the job to clean hands include:
 - Before and after work shifts
 - Before and after work breaks
 - After putting on, touching, or removing cloth face coverings
 - Before and after touching any shared equipment or highly touched surfaces
- Use tissues when you cough, sneeze, or touch your face. Throw used tissues in the trash.
- If no tissues are available, cough or sneeze into your elbow.

Cleaning and Sanitizing:

- Gateway will maintain an adequate supply of cleaning and EPA approved disinfecting agents at each program facility.
- Gateway Program Supervisors/Maintenance staff will ensure that facilities are cleaned and disinfected at least at the end of each workday using products identified by the Environmental Protection Agency (EPA) as being effective against COVID-19.
- GCC Program Supervisors/Maintenance staff will ensure that restrooms and high touch points in common areas are sanitized several times throughout the program day in addition to the facility cleaning at the end of the day. High touch points include, but are not limited to:
 - Door handles

- Handrails
- Kitchen/bathroom faucets
- Vending machines
- Copying machines
- All cleaning and sanitation of the facilities and high touch points will be documented.
- There will be hand sanitizer available throughout the building for both staff and individuals. Individuals will be supervised using hand sanitizer as necessary.
- Sanitizing wipes and/or Lysol will be made readily available to staff to wipe down workstations and frequently touched surfaces.
- Shared workstations must be disinfected by staff after each use and documented.

Disinfection of Contaminated Areas:

- In the event that a staff member tests positive for COVID-19, their office and/or group room will be closed off and GCC Program Supervisors/Maintenance staff will ensure that the area and other commonly touched areas throughout the facility are disinfected.
- In the event that a client tests positive for COVID-19, GCC Program Supervisors/Maintenance staff will ensure that their group room and other commonly touched areas throughout the facility are disinfected.
- If feasible, Maintenance staff should wait 24 hours to disinfect contaminated areas.

TRANSPORTATION

Social Distancing Measures Inside Vehicles:

- All Gateway vehicles will be retrofitted with a temporary clear plastic barrier between the front and back of the vehicle.
- Capacity on buses, vans, and other vehicles transporting individuals from multiple residences should be reduced to 50% of total capacity to maximize social distancing and reduce COVID-19 transmission risks.
- Individuals and staff who reside/work together in the same home may be transported together to day program(s) in the same vehicle without a vehicle capacity reduction.
- Staff must wear a face covering at all times while in the vehicle.
- To the extent they can medically tolerate one, individuals must wear face coverings at all times in the vehicle. Social distancing must be maintained for individuals who cannot tolerate wearing a mask and, when possible, such individuals should be transported alone or with members of the same household.

Cleaning and Sanitizing Vehicles:

- All Gateway vehicles must be equipped with cleaning/disinfectants and must be cleaned thoroughly after the vehicles are returned to their base.
- Frequently touched surfaces in the vehicle should be disinfected between transporting passengers. Transporter should wait until all surfaces have dried prior to picking up the next passenger.

COMMUNICATION

Signage:

- There will be signs posted throughout the Gateway facilities to remind everyone to wear face coverings and to adhere to social distancing rules. Please see [example photo gallery](#) on our web site (bit.ly/gccovid19)
- There will be signs posted throughout the Gateway facilities to remind everyone to adhere to proper hygiene, social distancing rules, appropriate use of PPE, and cleaning and disinfecting protocols.

Staff Training:

- All staff will be trained on proper PPE usage and disposal as per CDC and OSHA guidelines and any other protocols implemented as part of the reopening plan.

Individual Training:

- Staff will support and educate individuals to learn physical distancing, the use of markers, foot traffic patterns throughout the building, and other program strategies.
- Staff will support and educate individuals to learn proper handwashing and hygiene techniques.

Communicating Updates:

- This plan will be updated in accordance with federal, state, and local regulatory agencies.
- Updates will be communicated to staff via Paycom, email, Microsoft Teams, and/or PowerDMS.
- Updates to the plan will also be posted on the GCC website.

Reporting Positive Cases and Contact Tracing:

Staff:

- Staff must inform their program director, c-level officers, Incident Management, and medical staff immediately if they test positive for COVID-19 and provide a list of anyone they have had close contact with during the two (2) weeks prior to the onset of symptoms/positive test result.
- Incident Management staff will notify the local health department and DOH immediately upon being informed of any positive COVID-19 test results.
- A designated GCC staff will notify potential contacts (i.e. employees, visitors) who had close contact with the COVID-19 positive person.

Individuals:

- Staff must inform their program director, c-level officers, Incident Management, and medical staff immediately if they are notified that an individual has tested positive for COVID-19.
- The program director/supervisor will provide a list of all individuals and staff that the individual had contact with during the two (2) weeks prior to the onset of symptoms/positive test result.
- Incident Management staff will notify the Justice Center, Incident Management Unit, and the local health department and DOH immediately upon being informed of any positive COVID-19 test results.

This policy been reviewed and endorsed by the Chief Compliance Officer, Chief Executive Officer, Deputy Chief Executive Officer, Chief Operating Officer, and the Chief Financial Officer.