



<b>COVID-19 Preparedness Plan</b>	<b>Effective Date</b>	June 12, 2020
	<b>Version Number</b>	2
	<b>Revision Date</b>	December 10, 2020
	<b>Approval</b>	June 12, 2020

Revision History

Date	Revision Number	Change	Reference Section(s)
12/10/2020	2	Added "Background" section.	---
12/10/2020	2	Effective January 4, 2021, PAI will begin delivering service from 9:00AM-2:30PM.	I
12/10/2020	2	Added "Informed Choice" section.	II
12/10/2020	2	Respiratory etiquette and allowable face coverings for staff members.	IV
12/10/2020	2	Respiratory etiquette and use of face coverings for participants.	IV
12/10/2020	2	Staff members will wear a KN95 mask any time they are within six feet of a participant for any extended duration of time.	V
12/10/2020	2	Blueair Blue Pure 211+ air purifiers are in every program room.	VII
12/10/2020	2	Specified temperature threshold forehead thermometer.	IX
12/10/2020	2	Specified that if a participant lives with an individual who has a positive test for COVID-19, the participant may not return to PAI for 14-calendar days from the date of the positive test.	IX
12/10/2020	2	Added "Responding to Close Contacts and Confirmed Cases of COVID-19" section.	X
12/10/2020	2	Added "Voluntary Temporary Facility Closure" section.	XI
12/10/2020	2	Added information regarding Remote Services.	XV

By attending programming at PAI, staff members, the participant and their interdisciplinary team agrees to and will adhere to the plan outlined in this document.

Executive Order 20-40, issued by Governor Walz on April 23, 2020, requires all businesses in operation during the peacetime emergency to establish a "COVID-19 Preparedness Plan". It is important to note that on March 16<sup>th</sup>, PAI voluntarily paused providing services at PAI Parkway. On March 17<sup>th</sup>, PAI voluntarily paused providing services at PAI Commerce, PAI Linden, and PAI Oakdale. This document outlines PAI's plan to safely resume services, address any suspected or confirmed cases of COVID-19, and keep staff members and participants safe at our Administrative Office and all four locations.

Effective May 29, 2020, Department of Human Services Commissioner, Jodi Harpstead, temporarily modified the licensing requirements for providers of day services for adults with disabilities. The modification includes new licensing requirements that are effective through the end of the peacetime emergency. The following are new requirements day service providers must follow while operating under the peacetime emergency:

- The license holder may provide services in the facility to participants who live in their own home or live with family members in non-congregate licensed or unlicensed settings;
- The license holder must limit occupancy to no more than 50% of the licensed capacity or a maximum of 50 people at a time, including staff, whichever is smaller;
- The license holder must deliver services in shifts, with a maximum duration of three hours of time on site throughout the day for each person receiving services. The license holder must document the start and end time of each shift and the staff who worked those shifts, and must ensure the facility is cleaned and disinfected between shifts;
- The license holder must create and maintain consistent cohorts of the same staff and persons receiving services. Cohorts must consist of 10 or fewer people, including staff. Cohorts must be maintained throughout the program week whenever possible; and
- The license holder must limit non-essential volunteers and visitors.

The safety of PAI participants, employees, and the community is PAI's highest priority. PAI developed this COVID-19 Preparedness Plan which outlines precautions and related requirements and describes many of the steps PAI is taking to reduce the risk of infection. COVID-19 is contagious and believed to spread mainly from person-to-person contact, including through the air from people who may not seem sick or know they are infected, and in other ways that the Centers for Disease Control and Prevention is still learning.

The possibility of exposure or infection by COVID-19 is increased by several activities including the kind of activities at PAI. PAI has made many changes to decrease the risk of infection based on guidance from the Minnesota Department of Health, the Centers for Disease Control and Prevention and other sources, knowing that nothing can guarantee that program participants or employees will not become infected with COVID-19.

All staff members are responsible for implementing this plan. The goal is to mitigate the potential for transmission of COVID-19 in our workplace and that requires full cooperation among all staff members and management. This Preparedness Plan follows Centers for Disease Control and Prevention (CDC), Minnesota Department of Health (MDH) guidelines, and federal Occupational Safety and Health Act (OSHA) standards related to COVID-19.

This is a living document and will be updated whenever significant new information pertaining to this pandemic is released. This Preparedness Plan is a supplement to PAI's existing Safety Policy.

## **Background**

On May 29, 2020, DHS temporarily modified certain licensing requirements to allow day service facilities for adults with disabilities to reopen partially to people living in their own home or family home.

On July 13, 2020, licensed day service facilities reopened to people with living in any setting and receive day services, if the facility followed the new licensing requirements for day service providers.

On August 13, 2020, DHS added additional flexibilities for day service facilities regarding duration of services in the facility, capacity limits and access to community facilities.

Effective October 16, 2020, DHS added additional flexibilities for day service facilities to increase the maximum duration per person, per day to six-hours and to expand options for people to access indoor community facilities during the COVID-19 emergency.

## I. Return to Service

Participants who live in a congregate setting may attend day service facilities, provided the congregate setting has not had a COVID-19 exposure in the last 14-days.

The Commissioner has temporarily modified Minnesota Statutes, Section 245D.29, by adding the following health and safety requirements:

- The license holder must create and implement staggered activity schedules that minimize contact with others outside of assigned cohorts;
- The license holder must ensure that cohorts are meeting within the facility in designated areas that are protected from other cohorts using separate rooms or other physical barriers;
- The license holder must use visual aids (e.g., painter's tape, stickers) to illustrate traffic flow and appropriate spacing to support social distancing;
- The license holder must rearrange any seating spaces to maximize the space between persons receiving services with at least six-feet between seats; and
- The license holder must develop and implement arrival and departure protocols for persons receiving services that include social distancing strategies and other mitigation efforts, including staggering of arrival and departure times and minimizing congregating in groups at transition times.

PAI strongly encourages "at risk" persons to stay home except to engage in necessary activities for health and wellbeing. Consistent with guidance issued by the CDC, "at risk persons" are defined as:

- 65 years and older;
- Living in a nursing home or a long-term care facility; or
- Any age with underlying medical conditions.

Based on the requirements noted above, **effective June 22, 2020 through December 31, 2020**, PAI will deliver service in two shifts, with different groups of people served during each shift:

- A. 7:30AM to 10:30AM or 8:00AM to 11:00AM
- B. 12:00PM to 3:00PM or 12:30PM to 3:30PM

Staff members will disinfect the building between each shift based on the process outlined in section VII.

Participants will be invited to return to PAI programs in phases. PAI will communicate with each participant and their interdisciplinary team to discuss a potential return date and related considerations. PAI will consider extenuating circumstances on a case-by-case basis including PAI's ability to provide needed supports or accommodations.

PAI will monitor Governor Walz's orders in addition to guidance published by the Minnesota Department of Human Services. PAI will decide on a tentative return to service date based on this and other relevant information.

PAI management will discuss the return to service phases and the feasibility of advancing to the next phase. PAI staff members will reach out to participants and guardians to establish a return to service phase as soon as reasonably possible.

Once PAI has determined how many clients will return to programming during each phase, PAI supervisors will reach out to their staff members to discuss when they will return to work. PAI will maintain necessary staffing ratios to provide proper support and care to participants.

**Effective January 4, 2021**, PAI will begin delivering service from 9:00AM to 2:30PM.

Per [Minnesota Department of Human Services Bulletin #20-56-11](#), DHS is turning the dial on day services for adults with developmental disabilities. The amount of day services a person can receive per day in the community or in a facility cannot exceed six-hours. The six-hour maximum per shift does not include transportation time. All other requirements per [New Licensing Requirement for Providers of Day Services for Adults with Disabilities, DHS-7313-D](#) remain unchanged.

## II. Informed Choice

People with disabilities have the right to make an informed choice about whether they want to receive services in community settings, in day service facilities, or via remote service delivery. Lead agencies and providers should set up time to have conversations with the person and their support team to discuss the individual risks and benefits. Factors to discuss and/or consider include:

- Is the participant at a higher risk for infection because they are older than age 65 or have an underlying health condition, as defined in [Emergency Executive Order 20-55](#)?
- Is it possible for the person to receive services remotely?
- Can the person protect themselves and others by washing their hands often; avoiding touching their eyes, nose and mouth; covering their coughs and sneezes; and wearing a protective mask or cloth face covering?
- Can the person access transportation safely?
- Given all these factors, is the benefit of returning to day services outweighed by the health risk associated with returning to day services?
- Is the person's current Individual Abuse Prevention Plan (IAPP), Self-Management Assessment (SMA), and outcomes consistent with receiving services in the community?

## III. Handwashing and Personal Hygiene

Basic infection prevention measures are always in place at PAI's program locations. Staff members are instructed to wash their hands for at least 20 seconds with soap and water frequently throughout the day, and especially at the beginning and end of their shift, prior to and following eating, and after using the restroom. All visitors to the facility will be required to wash their hands immediately upon entering the facility. Additionally, hand sanitizer dispensers are available throughout the building and can be used for hand hygiene.

- a. Participants will be reminded and supervised when appropriate to wash their hands for at least 20 seconds with soap and water frequently throughout the day, and especially at the beginning and end of their day, prior to and after eating, and after using the restroom.
- b. Posters with instructions on how to appropriately wash hands are hung in highly visible public areas and restrooms.
- c. Staff members will ensure adequate inventory of disinfectant, hand sanitizer, soap, and tissues—and that necessary supplies are distributed to employee and participant areas.

## IV. Respiratory Etiquette

Staff members are instructed to cover their mouth and nose with their sleeve or a tissue when coughing or sneezing. They should dispose of tissues in the trash and wash or sanitize their hands immediately afterward. Respiratory etiquette will be demonstrated on posters and supported by making tissues and trash receptacles available to all staff members and visitors.

- a. All staff members are required to wear a surgical mask covering their nose and mouth while at all four program locations. KN95 masks are always available to staff if they prefer a KN95 mask over a surgical mask. Homemade or purchased cloth masks are not allowed when in the program locations.
- b. Due to the low number of staff at the Administrative Office, the following types of masks are allowed:
  - i. Homemade or purchased cloth mask;
  - ii. Surgical mask; and

- iii. KN95 mask without an exhaust valve.

PAI reserves the right to not permit the use of a mask, eye shield, and gloves if they are determined to be inappropriate or compromise the health and safety of others.

All participants are encouraged to wear a face covering while receiving services at PAI. However, the use of face coverings may be a barrier for people with disabilities. In certain circumstances, the use of face coverings may not be reasonable, and accommodations can be made. Mask mandate exemptions include:

- People who have medical or other health conditions, disabilities, or mental health, developmental, or behavioral needs that make it difficult to tolerate wearing a face covering.
- Any person who has trouble breathing, is unconscious, sleeping, incapacitated, or is otherwise unable to remove the face covering without assistance.

Face shields may be an alternative option for participants who cannot wear masks due to medical or other conditions.

Staff members and/or participants who are hard of hearing can:

- Remove their mask if they can maintain a safe social distance of six feet;
- Use a face shield instead of a face covering to allow for visibility of facial expressions and lip movements for speech perception; and
- Use speech-to-text apps or write notes on paper or mobile devices.

#### V. Personal Protective Equipment (PPE) for Personal Cares and Meal Time

Staff members will wear a KN95 mask any time they are within 6-feet of a participant for any extended duration of time. In addition, eye protection (e.g., face shield, goggles, or safety glasses with side shields) and gloves will be worn when feeding and passing medication. If secretions or bodily fluids are anticipated, or for any encounters that require extensive body contact (e.g., rolling, toileting), a gown will be worn as well.

A fact sheet will be posted regarding how to use PPE in all locations.

#### VI. Social Distancing

Staff members are prohibited from gathering in groups and confined areas, using other staff members or participant's PPE, phones, computer equipment, desks, cubicles, workstations, offices or other personal work tools or property unrelated to job duties.

- a. Participant workstations must be six-feet apart at all time (including meal time) and participants are not permitted to share workstations.
- b. To decrease the likelihood of cross-contamination, participants will be assigned to a specific area for the day and should remain in that area for the duration of the day.
- c. Employees must disinfect the workstation of any participant before it is used and at the end of the day.
- d. Handshakes, high-fives, and hugs are prohibited unless an absolutely required supportive measure in accordance with a participant's documented service plan.
- e. Participants are not allowed to move around the building. Staff members will limit their own movement to essential work duties.
- f. Meetings, including those among staff members in the same building, will be held by phone or videoconferencing.
- g. Until further notice, staff members and participants are not permitted to share food or bring in communal food items – such as pizza, doughnuts, snacks, and other individually packaged food items.
- h. Microwaves, refrigerators, and water fountains are temporarily closed. Until further notice, staff members and participants must bring in a cold lunch with an ice pack and their own water bottle.

- i. No more than ten people, including staff, can be in any one given area such as a program room.
- j. Signage will be posted throughout program locations to remind staff members and participants to maintain social distance requirements.
- k. Plexiglass will be installed where appropriate at reception desks, in classrooms, and at workstations.

If a participant is unable to adhere to these guidelines, they will need to be picked-up by a member of their interdisciplinary team.

#### VII. Cleaning, Disinfection and Ventilation Protocols

- a. Regular housekeeping practices are being implemented, including, but not limited to:
  - i. Routine cleaning and disinfecting of surfaces;
  - ii. Wiping down equipment, tools, and machinery;
  - iii. Sanitizing break rooms, lunchrooms, and meeting rooms;
  - iv. Two times per day, high-touch areas such as phones, keyboards, touch screens, controls, door handles and copy machines will be disinfected; and
  - v. Regularly emptying waste containers.
- b. PAI staff members will wipe down all surfaces including restrooms at the beginning and end of each program day.
- c. City Wide Janitorial is PAI's contracted cleaning vendor and is scheduled to clean and disinfect the building at the end of each business day.
- d. Hand sanitizer will be available at all entrance and exit points.
- e. Blueair Blue Pure 211+ air purifiers are in every program room.
- f. Ventilation will be checked at all locations and improved wherever possible to increase airflow. The following ventilation options are being considered by PAI's Facility Manager:
  - o Fans to circulate air within the buildings;
  - o Cleaning and filter bypass checks for existing HVAC systems; and
  - o New air filters in all buildings.

#### VIII. Transportation

PAI's transportation partner, Newtrax, has published their COVID-19 Preparedness Plan and it can be found via this [link](#) or via their home page at [www.newtrax.org](http://www.newtrax.org). Participants are encouraged to review the Newtrax plan prior to resuming transportation services.

Alternatively, guardians and residential providers may provide their own transportation to PAI. Drop-off and pick-up times will be staggered to allow time and space for participants to enter the building. Participants will remain in their transportation vehicle until they are signaled to approach the health check station to enter the building.

Prior to participants being transported to PAI, all private residences and licensed facilities are required to monitor symptoms outlined in MDH's [Health Screening Questionnaire](#). Participants are not permitted to report to PAI if they are displaying any symptoms.

#### IX. Screening policies for employees and participants exhibiting signs and symptoms of COVID-19

Staff members, guardians, residential providers, and participants are encouraged to self-monitor for signs and symptoms of COVID-19. PAI staff members will be trained on self-assessment specifics. The following policies and procedures are being implemented to assess the health status of staff members and participants prior to entering PAI locations and for staff members and participants to report when they are sick or experiencing symptoms.

Per MDH recommendations, PAI has established health screening and related protocols for staff members and participants.

Protocol	Participant	Staff	Additional Actions and Information
Wash hands with soap and water for at least 20 seconds upon entering the building.	•	•	
For those unable to wash their hands, hand sanitizer will be available.	•	•	
Drop off times will be staggered to avoid overcrowding at building entrances.	•		
Start times will be staggered to avoid overcrowding in breakrooms and common areas.		•	
During bus unloading and loading, wheelchairs will be disinfected as appropriate.		•	
Prior to entering the building or program areas, temperatures will be taken.	•	•	Anyone with a temperature over 99.5 will not be permitted into the building or program areas.
Prior to being transported to PAI, the <b>Health Screening Questionnaire</b> from the Minnesota Department of Health will be completed.	•		If a participant answers “Yes” to any health screening questions, they will not be permitted to attend PAI and are advised to stay home, stay away from other people, and contact their health care provider.
Prior to entering any program areas, PAI’s symptom screener document will be completed.		•	If a staff member answers “Yes” to any symptom screener questions, they will not be permitted to enter any program areas at PAI and are advised to go home, stay away from other people, and contact their health care provider.
Upon arrival at PAI, if a fever of 99.5 or higher is listed on the read-out screen of the forehead (non-contact) thermometer, a fever develops while at PAI, and/or symptoms of COVID-19 are displayed, the individual will isolate until they are able to drive home—or be picked-up by their legal representative or residential provider.	•	•	<p><b>The Conference Room at each location is a designated isolation room in addition to:</b></p> <ul style="list-style-type: none"> <li>• Commerce: Director’s Office</li> <li>• Linden: Music Room</li> <li>• Oakdale: Serenity Program Room</li> <li>• Parkway: Director’s Office</li> </ul> <p>A staff member will wait with a participant until they are picked-up. The staff member will wear a KN95 mask or respirator, eye protection, a gown, and gloves.</p>

			The isolation room will be thoroughly disinfected after each use.
Individuals displaying symptoms of COVID-19 or have a temperature above 99.5 need to be picked-up from PAI within one-hour.	•		
Individuals who suspect they have been exposed to COVID-19 must contact the Minnesota Department of Health COVID-19 Hotline at: 651-201-3920 for consultation.	•	•	Staff members should contact their supervisor immediately.  Participants and staff should not report to PAI until they have been cleared per MDH guidelines or if they have received a negative COVID-19 test.
PAI will provide notice for any confirmed cases of COVID-19.	•	•	PAI will contact the participant's interdisciplinary team via phone and e-mail—and will send a written notice via communication books and ground mail.
Parents, guardians, legal representatives, and residential providers will notify PAI of any confirmed cases of COVID-19.	•		
If an individual resides with a person with a confirmed case of COVID-19, the individual is not to report to PAI for 14-calendar days from the date of the confirmed positive test.	•	•	

X. Responding to a Close Contacts and Confirmed Cases of COVID-19

PAI can identify all staff and/or participants who are close contacts to a confirmed case of COVID-19 at the facility. All close contacts will be notified of the exposure and advised to stay home and away from others for 14-days after the last exposure. A person with COVID-19 is considered infectious 48-hours before they started to experience symptoms (or date of positive test if they were asymptomatic) until they are no longer in the facility or until they have been determined to be cleared of infection per CDC guidance.

If there is a confirmed case of COVID-19 at PAI, all participants and staff members of the cohort are considered a close contact and must not return to the program for 14-days.

- Participants who have a confirmed case of COVID-19 will follow the CDC's [Discontinuation of Isolation for Persons with COVID-19 Not in Healthcare Settings](#)
- Staff members who have a confirmed case of COVID-19 will follow the CDC's [Criteria for Return to Work for Healthcare Personnel with SARS-CoV-2 Infection](#).
- PAI will report all confirmed cases of COVID-19 by [Submitting Clinical Information on Long Term Care and Adult Day COVID-19](#).

PAI will notify staff members and participants via phone, email, and written notice if they have been exposed to COVID-19 and meet the definition of close contact. A close contact is otherwise defined as someone who was within 6-feet of the individual with COVID-19 for a cumulative total of 15-minutes or more over a 24-hour period.

- For staff members who have been exposed to COVID-19 or are considered a close contact, MDH recommends PAI follow the CDC's [Interim U.S. Guidance for Risk Assessment and Work Restrictions for Healthcare Personnel with Potential Exposure to COVID-19](#).
- For participants who have been exposed to COVID-19 or are considered a close contact, MDH recommends PAI follow the CDC's [Public Health Guidance for Community-Related Exposure](#).



- Staff members and/or participants who are close contacts to a positive case of COVID-19 will be directed to stay home for 14-days from the last date of exposure, regardless of whether the person seeks testing and receives negative test results.
- MDH recommends all persons who have high risk contact seek testing within five to seven days following the high risk exposure.
- The following fact sheet will be provided: [What to Do if You Have Had Close Contact with a Person With COVID-19](#).

#### XI. Voluntary Temporary Facility Closure

PAI will voluntarily temporarily close each facility until services can be delivered safely if one or more of the following considerations is met:

- COVID-19 exposure or infection in 50% or more of cohorts;
- Inability to maintain minimum staffing ratios; and
- Participants voluntarily stay home from programming due to a high-risk exposure and/or infection.

#### XII. Leave Policies

PAI has implemented interim leave policies designed to support staff members staying at home when they are sick, when household members are sick, or when required by a health care provider to isolate or quarantine themselves or a member of their household.

- a. Employees needing accommodations for underlying medical conditions or who have household members with underlying health conditions are directed to contact their supervisor and PAI's Human Resources Manager.
- b. Employees may use accrued PTO and medical pool hours for time missed due to illness.
- c. Employees may be eligible for 80 hours (pro-rated for part-time employees) of emergency sick leave paid by PAI as required by the Families First Coronavirus Response Act (FFCRA). Other eligibility criteria under the FFCRA include the following:
  1. Have been advised by a health care provider to self-quarantine because of concerns related to COVID-19;
  2. Are caring for another who is subject to quarantine or has been advised by a healthcare provider to self-quarantine because of concerns related to COVID-19; and
  3. Need to care for a child because school or childcare is closed or unavailable because of COVID-19.

Employees are instructed to contact PAI's Human Resources Manager to determine eligibility for emergency sick leave. Additionally, employees may be eligible for Emergency Family Medical Leave Act (EFMLA) once their emergency sick leave is exhausted, should they need more time away from work to care for a child due to school or daycare remaining closed due to COVID-19.

#### XIII. Visitors

Until further notice the below non-essential visitors and volunteers are not allowed in PAI's facilities:

- Music Therapy;
- Pet Therapy;
- External programming personnel;
- Non-essential visits from interdisciplinary team members; and
- Vendors (deliveries will be dropped outside of buildings).

#### XIV. Work from Home

Per Emergency Executive Order 20-63, staff who are not required onsite to deliver services must work remotely until further notice.

#### XV. Remote Services

PAI will provide services remotely via phone or other interactive technology media as an alternative to in-person day and employment services. Remote Services will be delivered by PAI staff members to participants in their own home virtually. For more information on Remote Services, please review [Minnesota Department of Human Services Bulletin #20-56-02](#).

#### XVI. Communications and Training

The Preparedness Plan is shared with all staff members and necessary training will be provided to new and existing staff members prior to performing job duties. The President, Vice President of Operations, and Program Directors will continue to monitor the training and effectiveness of PAI's Preparedness Plan and will make corrections as deemed necessary. This plan is posted on PAI's website and in employee breakrooms; offered to participants, legal representatives, case managers (if applicable); and is available to the Commissioner upon request. The Preparedness Plan has been certified by PAI leadership and the Board of Directors Operations Committee.

This plan is subject to change and PAI will continue to monitor recommendations from Governor Walz, the Minnesota Department of Human Services, the Minnesota Department of Health, and the Centers for Disease Control.

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