Radiologic Associates of Fredericksburg (RAF) and Medical Imaging Management (MIM)

INFECTIOUS DISEASE (COVID-19) PREPAREDNESS AND RESPONSE PLAN

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Radiologic Associates of Fredericksburg, Ltd. and Related Entities

Policies and Procedures for Infectious Disease (COVID-19) Preparedness and Response Plan

Created: August 2020

Approved: CEO

Purpose

Radiologic Associates of Fredericksburg (RAF) and its related entities, hereafter known as the "Practice", has adopted this Infectious Disease (COVID-19) Preparedness and Response Plan which describes the implementation of mandatory health and safety requirements established by the Virginia Department of Labor and Industry Emergency Temporary Standards (ETS), Governor Northam's COVID-19 Executive Order and subsequent Addendum as well as guidelines from the Centers for Disease Control (CDC).

Responsibilities

The Practice has assigned the following individual(s) to serve in the role of health officer. The health officer has the authority to stop or alter activities to ensure that all work practices conform to the mandatory safety and health requirements applicable to COVID-19 as well as any other infectious disease hazards.

Health Officer(s)			
Name	Title	Department	Phone #
Chris Snyder	COO	RAF	540-361-1000
Lori Szweda	Executive Director Technical and Clinical	RAF	540-361-1000
	Services		
Jennifer Dawson	NP-C VIVA Director	VIVA	540-654-9118
Tammy Gressly	Director of Administrative Operations	RAF	540-361-1000

For the purpose of ensuring compliance with the most recent safety and health requirements, the Director of Administrative Operations and VIVA Director are responsible for administering this plan, monitoring agencies for new requirements, updating this plan, communicating any changes to employees, and monitoring the overall effectiveness of the plan. These persons are also responsible for providing employees with a copy of this plan upon request.

Determination of Exposure Risk by Job Duty

We have determined the COVID-19 exposure risk level of all facility functions to ensure that we apply appropriate hazard controls – including training, equipment, and personal protective

equipment (PPE) – to protect employees' safety and health. This assessment is based on OSHA Publication 3990. Classes of employees have been assigned to risk categories as follows:

Exposure Risk Level means an assessment of the possibility that an employee could be exposed to the hazards associated with SARS-CoV-2 virus and the COVID-19 disease. Hazards and job tasks have been divided into four risk exposure levels: "Very High", "High", "Medium", and "Lower".

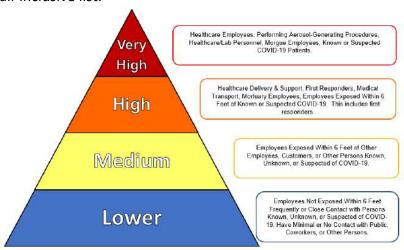
"Very High" exposure risk hazards or job tasks are those in places of employment with high potential for employee exposure to known or suspected sources of the SARSCoV-2 virus and the COVID-19 disease including, but not limited to, during specific medical, postmortem, or laboratory procedures (refer to page 8 of the 16 VAC 25-220, Emergency Temporary Standard/Emergency Regulation for a more detailed description).

"High" exposure risk hazards or job tasks are those in places of employment with high potential for employee exposure within six feet with known or suspected sources of SARS-CoV-2 that are not otherwise classified as "very high" exposure risk (refer to page 8 of the 16 VAC 25-220, Emergency Temporary Standard/Emergency Regulation for a more detailed description).

"Medium" exposure risk hazards or job tasks that are not labeled as "very high" or "high" (refer to pages 9-10 of the 16 VAC 25-220, Emergency Temporary Standard/Emergency Regulation for a more detailed description).

"Lower" exposure risk hazards or job tasks are those not otherwise classified as "very high", "high", or "medium" exposure risk that do not require contact within six feet of persons known to be, or suspected of being, or who may be infected with SARS-CoV-2; nor contact within six feet with other employees, other persons, or the general public except as otherwise provided in this definition (refer to page 10 of the 16 VAC 25-220, Emergency Temporary Standard/Emergency Regulation for a more detailed description).

The following graph relates to job tasks that pose a risk level to employees. The job tasks that are listed are not an all-inclusive list.



Reference COVID19 Hazard Assessments (Attachment A) and RAF Policies and Procedures for Potential COVID-19 Exposure to Employee in Workplace (Attachment B) for facility specific risk assessment certificates to include exposure risk level of each employee or class of employee based on their type of work and duties. As described in these materials (including Attachments A and B), the Practice has assessed the workplace to determine if COVID-19 disease hazards or job tasks are present or are likely to be present that necessitate the use of PPE. The Practice has identified the types of PPE that will protect the affected employee from the COVID-19 hazards identified in the assessment and communicated those selection decisions to each affected employee. The Practice has also ensured that the selected PPE properly fits each affected employee.

Resources used to determine risk levels: "Exposure risk level" of the Emergency Temporary Standard for COVID-19 by the Virginia Department of Labor and Industry. Also, consult pages 18 - 21 of the OSHA document "Guidance on Preparing Workplaces for COVID-19" which is available at http://www.osha.gov/Publications/OSHA3990.pdf

Contingency Plan in the Event of an Infectious Disease Outbreak

In the event of an outbreak or infectious disease pandemic, the Practice has set up contingency plans for addressing the workplace needs as well as employee safety and health during the outbreak.

The Practice's Emergency Preparedness and Disaster Recovery Manual will be followed in the event of a pandemic outbreak.

Contingency plans include but are not limited to the following:

- 1. Alternating onsite and remote teams to address employee and patient social distancing
- 2. Telehealth appointments when feasible
- 3. Increased environmental cleaning
- 4. Telework implemented as appropriate
- 5. Plexiglas shielding
- 6. No visitor policy
- 7. Patient screening
- 8. Employee self-monitoring and screening
- 9. Facility wide mask policy
- 10. Altering facility hours to include closing or decreasing open hours at facilities
- 11. Increased space between appointments as needed for cleaning
- 12. Utilize staffing from facilities that were closed/not open to provide additional support
- 13. Cross training employees from other facilities
- 14. Moving workspaces to increase distance between employees
- 15. Video conferencing instead of in person meetings
- 16. Purchasing additional PPE

- 17. Continued evaluation of best place of service for procedures based on risk of disease transmission
- 18. Signage at entrance and throughout facilities
- 19. Hand sanitizer (alcohol-based containing at least 60% ethanol or 70% isopropanol) and disinfecting sprays and wipes for employees and patients to use
- 20. Occupancy limitation in common areas (break rooms, conference rooms, waiting rooms etc. to maintain appropriate social distancing).
- 21. Increased frequency of common area wipe down.

Basic Infectious Disease Prevention and Control Measures

To control the spread of infectious diseases such as COVID-19, basic prevention and control measures have been implemented to ensure that all employees and patients are protected against the hazards of infectious disease.

The Practice ensures that general housekeeping is performed daily. Additional housekeeping measures are also taken, as necessary, to ensure the safety and health of employees and to decrease the spread of an infectious disease such as:

- 1. All restrooms, common areas that remain in use, doorknobs/handles, tools, equipment, and other frequently touched surfaces are disinfected before, in the middle of, and at the end of each shift.
- 2. All contact surfaces used by more than one person are disinfected at the end of each person's use.
- 3. All disinfectants are EPA-approved or otherwise comply with CDC disinfection guidance.
- Adequate disinfection products are on hand, safety data sheets (SDSs) are maintained, and employees using the products are aware of any personal protective equipment required for use.
- 5. Additional precautions and actions taken by the Practice when feasible are:
 - a. Gatherings are minimized; staff meetings are postponed, cancelled or held remotely:
 - b. Employees are encouraged to maintain physical distance even when on break;
 - c. Employees are to maintain physical distance when reporting to work, clocking in, leaving work, and clocking out;
 - d. Employer may utilize flexible work hours, wherever possible, to limit the number of employees simultaneously working on-site; and
 - e. Employee interactions with the general public are modified to allow for additional physical space between parties.
- 6. The Practice has ensured the appropriate air-handling systems are installed and maintained in accordance with the manufacturer's instructions and comply with minimum American National Standards Institute (ANSI)/American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Standards 62.1 and 62.2 (ASHRAE 2019a, 2019b), which include requirements for outdoor air ventilation in most residential

- and nonresidential spaces, and ANSI/ASHRAE/ASHE Standard 170 (ASHRAE 2017a), which covers both outdoor and total air ventilation in healthcare facilities.
- 7. The Practice follows existing guidelines and facility standards of practice for identifying and isolating infected persons and for protecting employees.
- 8. To the extent feasible, the Practice ensures that psychological and behavioral support is available to address employee stress at no cost to the employee.
 - a. MIM/RAF has an Employee Assistance Program to assist our employees with a variety of needs, such as, work-life balance, travel assistance/ID Theft, and grief counseling. For more information or to receive assistance by call 800-964-3577 24/7.



Employee Assistance Program

A MIM Benefit through The Hartford Insurance

thehartford.com/employeebenefits www.guidanceresources.com

Organization Web ID: HLF902 Company Name: ABILI

Emotional or Work-Life ♦ Financial ♦ Legal ♦ Health NOTE: It's a violation to share this information with individuals who are not eligible.



800.964.3577

24/7 access

Thehartford.com/employeebenefits www.guidanceresources.com Organization Web ID: HI 5902

Organization Web ID: HLF902 Company Name: ABILI

Emotional or Work-Life ♦ Financial ♦ Legal ♦ Health NOTE: It's a violation to share this information with individuals who are not eligible.

Identification and Isolation of Sick and/or Exposed Employees

800.964.3577

24/7 access

Risk and exposure determinations are made without regard to employees protected characteristics as defined by local, state, and federal law.

The Practice will comply with all applicable statutes and regulations that protect the privacy of persons who have a communicable disease. Any health-related information and documentation gathered from employees is maintained confidentially and disclosed only on a strictly need-to-know basis in compliance with state and federal law. Specifically, medical documentation is stored separate from employee's personnel documentation. Employees may access their own COVID-19 related exposure and medical records upon request to Human Resources.

When investigating any possible workplace exposure, the Practice will investigate without disclosing the name of the individual or revealing any personally identifiable information about such person unless otherwise required by law. When notifying employees, other employers, and/or any building/facility owner of any possible exposure, the Practice will keep confidential the identity of the employee known to be infected with COVID-19 in accordance with the requirements of the Americans with Disabilities Act and other applicable federal and state laws and regulations.

Employee Self-Monitoring

The following employees should **not** report to work and, upon notification to the Director of Administrative Operations or HR Manager, will be removed from the regular work schedule:

- 1. Employees who have tested positive for COVID-19.
- 2. Employees who display COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting, whether or not accompanied by a formal COVID-19 diagnosis (where no alternative diagnosis has been made).

Employees who have been exposed outside of work within the past 14 days to a person known or suspected to be infected with COVID-19 should contact the Director of Administrative Operations or HR Manager prior to reporting to their next scheduled workday.

Employees should self-monitor their symptoms by self-taking their temperature and checking for fever each morning before work. The Practice considers a person to have a fever when he or she has a measured temperature of 100.0° F or greater, feels warm to the touch, or indicates a history of feeling feverish. The Practice recommends that employees follow CDC guidance on What to Do if You Are Sick and guidance on If You Are Sick or Caring For Someone. Employees who are experiencing symptoms consistent with COVID-19 (and where no alternative diagnosis has been made) should notify the Director of Administrative Operations or HR.

Additionally, employees should be aware of Close Contact with a person known or suspected to be infected with COVID-19. Employees who, outside of work, have been in Close Contact within the past 14 days to a person known or suspected to be infected with COVID-19 should contact the Director of Administrative Operations or HR Manager for guidance **prior** to reporting for work. The Practice will evaluate potential exposure and any work restrictions on a case-by-case basis and follow applicable guidance, including the Virginia Department of Health's <u>Guidance for Assessing and Managing Exposed</u>, Asymptomatic Healthcare Personnel as well as the CDC's <u>Strategies to Mitigate HCP Staffing Shortages</u>.

Note that "Close Contact" includes (i) for at least 15 minutes being within 6 feet of someone who is known/suspected to be infected with COVID-19, (ii) providing care to someone who is sick and known/suspected to be infected with COVID-19, (iii) direct physical contact with a person known/suspected to be infected with COVID-19 (touching, hugging, kissing, etc.), (iv) sharing eating or drinking utensils with someone who is known/suspected to be infected with COVID-19, or (v) where a person known/suspected to be infected with COVID-19 has sneezed, coughed, or somehow gotten respiratory droplets on you.

Mandatory Daily Screenings

To prevent the spread of COVID-19 and to reduce the potential risk of exposure, the Practice has implemented employee daily screening as follows:

- 1. When an employee reports for work, the Practice will screen employees prior to starting work utilizing the below questions. The Practice will also screen any visitors prior to entering the workplace using these same questions.
 - a. Since your last day of work, or since your last visit to this facility, have you had any of the following symptoms:
 - i. A new fever (100.0° F or higher) or a sense of having a fever without taking fever reducing medications?
 - ii. A new cough that you cannot attribute to another health condition?
 - iii. New shortness of breath that you cannot attribute to another health condition?
 - iv. New chills that you cannot attribute to another health condition?
 - v. A new sore throat that you cannot attribute to another health condition?
 - vi. New muscle aches (myalgia) that you cannot attribute to another health condition, or that may have been caused by a specific activity (such as physical exercise)?
 - vii. New loss of sense of smell or taste?
 - viii. New gastrointestinal problems, including nausea, diarrhea, and vomiting that you cannot attribute to another health condition?
 - b. Have you had a positive test for the virus that causes COVID-19 disease within the past 10 days?
 - c. In the past 14 days, outside of work, have you had Close Contact with someone suspected or confirmed to be infected with COVID-19?
 - i. Note that "Close Contact" includes (i) for at least 15 minutes being within 6 feet of someone who is known/suspected to be infected with COVID-19, (ii) providing care to someone who is sick and known/suspected to be infected with COVID-19, (iii) direct physical contact with a person known/suspected to be infected with COVID-19 (touching, hugging, kissing, etc.), (iv) sharing eating or drinking utensils with someone who is known/suspected to be infected with COVID-19, or (v) where a person known/suspected to be infected with COVID-19 has sneezed, coughed, or somehow gotten respiratory droplets on you.
- 2. If an employee or visitor answers "yes" to any of these screening questions, the Practice will take the following precautions:
 - a. Immediately isolate the person away others in a designated area and ask that person to wear a face covering (if not already wearing one). Note that the Practice will provide a face covering to anyone suspected to be infected with COVID-19 until they are able to leave the facility.
 - b. Immediately contact the Director of Administrative Operations or HR Manager.

- c. Determine if the person needs immediate medical care or can safely be sent home:
 - i. Many cases of COVID-19 are mild and do not require medical care. In these situations, the ill person should leave the facility and self-isolate at home.
 - ii. If the person is not severely ill, but medical care seems indicated, the employee should call his or her healthcare provider before visiting the provider's office (if the person does not have a healthcare provider, the person should first call an urgent care center or hospital emergency room) and then self-isolate at home.
- d. If the person is experiencing a medical emergency or emergency warning signs of COVID-19 including, but not limited to, trouble breathing, persistent pain or pressure in the chest, new confusion, or bluish lips, the Practice will call 911 and notify the operator that the person might have COVID-19.
- 3. The Practice will <u>not</u> permit employees or other persons known or suspected to be infected with COVID-19 (or who answers "yes" to any of the COVID-19 safety questions) to report to or remain at the facility, interact with other employees, or to engage in work at any location until cleared to return to work. Additionally, the Practice reserves the right to exclude a person with a communicable disease from workplace facilities, programs and functions if the Practice finds that, based on a medical determination, such restriction is necessary for the welfare of the person who has the communicable disease and/or the welfare of others within the workplace.
- 4. In facilities where thermometers are available, employees are to check their temperature upon entering the facility. If the employee's temperature is 100.0° F or over, they are to leave the facility immediately and notify their manager/supervisor and Human Resources.
- 5. Employees who develop symptoms during their shift must immediately report to the Director of Administrative Operations or HR Manager.

Reference RAF Policies and Procedures for Symptomatic COVID-19 Employee (Attachment C) and RAF Policies and Procedures for Employee Positive for COVID-19 (Attachment D).

Return-to-Work Requirements

Employees who were themselves diagnosed with COVID-19 or experiencing COVID-19 symptoms may only return to work upon confirmation of the cessation of symptoms and contagiousness. The Practice follows state and federal guidance as well as guidance from the employee's healthcare provider for return to work determination.

Reference RAF Policies and Procedures for COVID-19 Positive Employee Return to Work (Attachment E).

Emergency paid sick leave is available to employees as per the Families First Coronavirus Response Act (FFCRA). In addition, if FFCRA emergency paid sick leave is exhausted, employees may use their company accrued PTO for missed days. The Families First Coronavirus Response Act Policies and Posters are posted facility break rooms and have been sent out electronically to

staff as well. If employees have questions regarding use of emergency paid sick time, employees should contact the Director of Administrative Operations of the HR Manager.

Reference RAF Policies and Procedures for FFCRA Emergency Paid Sick Leave (Attachment F).

Procedures for Minimizing Exposure from Outside of Workplace

Business practices are evaluated to ensure the safety and health of all individuals. This is done on a phased approach. Beginning with appointment only onsite meetings, virtual meetings, and finally transitioning to onsite meetings with appropriate precautions when that time comes.

Reference RAF Policies and Procedures for Potential COVID-19 Exposure to Employee Outside of Work (Attachment G).

To minimize exposure from visitors, vendors, and the general public:

- 1. Social distancing practices are to be observed.
- 2. 6-foot distances are marked in areas where individuals might gather/wait.
- 3. Visitors and third-party vendors in the workplace are limited.
- 4. In person meetings are limited and replaced by conference calls.
- 5. Face to face contact is minimized where feasible.
- 6. Computer workstations positioned at least 6 feet apart, where feasible.
- 7. Business partners that work within the Practice have been provided this Plan.
- 8. Masks are available to patients/visitors/vendors as well as appropriate disinfectants so individuals can clean work areas before and after use.
- 9. Information is posted throughout each facility to educate individuals on ways to reduce the spread of COVID-19.
- 10. Any individual entering one of the facilities may have their temperature checked and/or a questionnaire completed prior to entry.

Training

All employees at the Practice will be trained on the hazards and characteristics of SARS-CoV-2 virus and COVID-19 disease. This training ensures that all employees recognize the hazards of SARS-CoV-2 and COVID-19 as well as the procedures to minimize the hazards related to the infectious diseases and help prevent the spread of the infectious disease.

The training material will cover the following:

- 1. Requirements of the COVID-19 Emergency Regulation.
- 2. The Practice's Infectious Disease COVID-19 Preparedness and Response Plan.
- 3. Characteristics and methods of spread of SARS-CoV-2 virus.
- 4. Symptoms of COVID-19 disease as well as the asymptomatic reactions of some persons to the SARSCoV-2 virus.

- 5. Safe and healthy work practices, including but not limited to, physical distancing, disinfection procedures, disinfecting frequency, and noncontact methods of greeting.
- 6. PPE
 - a. When PPE is required
 - b. What PPE is required
 - c. How to properly don, doff, adjust, and wear PPE
 - d. Limitations of PPE
 - e. Proper care, maintenance, useful life, and disposal of PPE
 - f. All employees in the workplace will be trained on this subject and procedures. All training will be certified and recorded according to the Emergency Regulations for COVID-19 by the Virginia Department of Labor and Industry.
- 7. Training Records are certified by the following requirements:
 - a. Employee name
 - b. Employee's signature (physical or electronic)
 - c. Date
 - d. Healthcare Compliance Pros (HCP) certificate (available in soft/hard copy, as requested)

Healthcare Compliance Pros (HCP) is the vendor used for employee compliance training. Completed Training certificates are available in soft copy to each employee after logging in and hard copy upon request.

Retention of training records must be retained in employee files. These records are located in the employee's online training module through HCP. All training records are maintained within the HCP platform.

Industry Specific Guidelines

The Practice follows industry specific guidelines specific to healthcare facilities and office regulations where applicable:

Outpatient Healthcare Facility Regulations

The Practice's outpatient facilities follow the guidelines in accordance with the CDC and Executive Order recommendations to include but not limited to the following, applicable to all clinical facilities:

- 1. Follow all infectious disease prevention and control recommendations as required for the outpatient healthcare setting.
- 2. Set up waiting rooms to allow patients to be at least 6 feet apart.
- 3. Reduce crowding in waiting rooms by asking patients to remain outside (e.g., stay in their vehicles or in a designated outdoor waiting area), if feasible, until they are called into the facility for their appointment.
- 4. Install barriers where appropriate.
- 5. Utilize telehealth where feasible.

- 6. Require the use of PPE.
- 7. Screen patients before entering the facility.
- 8. Limit all nonessential visitors.
- 9. Disinfect high touch areas multiple times throughout the day.
- 10. Place visual alerts, such as signs and posters in appropriate languages, at entrances and in strategic places providing instructions on hand hygiene, respiratory hygiene (including the use of cloth face coverings), and cough etiquette.

Office Regulations

The Practice's office settings follow the guidelines in accordance with the CDC and Executive Order recommendations to include but not limited to the following, applicable to all locations:

- 1. Require face coverings in shared spaces, including during in-person meetings and in the hallways.
- 2. Increase distancing between employees by spreading out workspaces, staggering workspace usage, restricting non-essential common space (e.g., break rooms, conference rooms, locker rooms).
- 3. Prohibit social gatherings and meetings that do not allow for social distancing or that create unnecessary movement through the office.
- 4. Provide disinfecting supplies and require employees to wipe down any shared workstations or phones.
- 5. Post signs about the importance of personal hygiene.
- 6. Disinfect high-touch surfaces in offices (e.g., whiteboard markers, restrooms, handles) and minimize shared items when possible (e.g., pens, remotes, and whiteboards).
- 7. Institute cleaning and communications protocols when employees are sent home with symptoms.
- 8. Notify potentially exposed employees if the employer learns that an individual with a confirmed case of COVID-19 has visited the office.
- 9. Limit all nonessential visitors.

COVID-19 Anti-discrimination Policy

The anti-discrimination provisions in 16VAC25-220-90 state that discrimination against an employee for exercising rights under this standard is prohibited.

The Practice adopted the following provisions as stated in the Emergency Temporary Standard:

1. No person shall discharge or in any way discriminate against an employee because the employee has exercised rights under the safety and health provisions of this standard, Title 40.1 of the Code of Virginia, and implementing regulations under 16VAC25-60-110 for themselves or others.

- 2. No person shall discharge or in any way discriminate against an employee who voluntarily provides and wears the employee's own personal protective equipment, including but not limited to a respirator, face shield, or gloves, or face covering if such equipment is not provided by the employer, provided that the PPE does not create a greater hazard to the employee or create a serious hazard for other employees.
- 3. No person shall discharge or in any way discriminate against an employee who raises a reasonable concern about infection control related to the SARS-CoV-2 virus and COVID-19 disease to the employer, the employer's agent, other employees, a government agency, or to the public such as through print, online, social, or any other media.
- 4. Nothing in this standard shall limit an employee from refusing to do work or enter a location that the employee feels is unsafe. 16VAC25-60-110 contains the requirements concerning discharge or discipline of an employee who has refused to complete an assigned task because of a reasonable fear of injury or death.

Attachment A – COVID-19 Hazard Assessments

COVID-19 HAZARD ASSESSMENT

Evaluator: Kathryn Meyers

Department/Division: MINS/NSICW

NS/NSION

Date: August 11, 2020

Job Task/Employee/Job Category: MINS/NSICW Clerical	INS/NSICW Clerkal		
Check the appropriate box for each hazard:	Description of hazard(s):	Engineering/Administrative Controls	344
Very High	Ohe that roam of the that	1	
1 4		1. Start are required to self-monitor for symptoms	1. Masks
	minimal occupational contact	and take their temperature prior to the start of	
Medium X	inside six feet with other	their shift.	z. Gloves (ii desired)
	employees, other persons, or the	2. Screening of all patients (visitors including	
	general public who may be	1emperature checks	
	infected with SARS-CoV-2, but	3. Masks are required of all staff visitors and	
	who are not known or suspected	patients when in common greas.	
	ed with the SARS-	4. Social distancing is implemented in waiting areas	
	CoV-2 virus.		
		5. Install physical barriers where possible.	
		controls,	
Job Yask/Employee/Job Category: MINS/NSICW Chrical	VS/NSICW Clinical		
Check the appropriate bax for each hazard:	Description of hazard(s):	Engineering/Administrative Controls	PPE
Very High	Jobs that require more than	Staff are real to the state of	
High	minimal occupational contact	and take their temperature prior to the start of	1. Masks
Medium X			2. Gloves
Lower	demployees, other persons, or the 12	2. Screening of all patients/visitors including	desired/needed)
High	≒	3. Masks are required of all staff violence	4. Face shields (if
Medium	spected		desired/needed)
Lower	to be infected with the SARS-	4. Social distancing is implemented in waiting areas	1
	<u>, , , , , , , , , , , , , , , , , , , </u>	 Install physical barriers where possible. Utilizing hand sanifizer and environmental 	
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The state of the s			
Check the appropriate box for each hazard:	Description of hazard(s): Engineering/A	Engineering/Administrative Controls	PPE
Very High			
High			
Medium			
Lower			
Job Task/Employee/Job Calegory			
Check the appropriate box for each hazard:	Description of hazard(s): Engineering/A	Engineering/Administrative Controls PPE	'n
Very High			
High			
Medium			
Lower			-
Job Task/Employes/Job Calegory			
Check the appropriate box for each hazard:	Description of hazard(s): Engineering/Ac	Engineering/Administrative Controls PPE	
Very High			
High			
Medium			
Lower			
licerify figal the above hiszoid by	ossessiment was partetined to the best of my knowledge an	ed to the best of my knowledge and ability, based on the hazards present on this date	£gale
>			

www.doli.virginia.gov

COVID-19 HAZARD ASSESSMENT

Evaluator: Tammy Gressly Department/Division: Radiologic Associates of Fredericksburg

Date:

August 13, 2020

PPE PPE Prior to the commencement of each shift employees are required to self-monitor |Masks Masks Prior to the commencement of each shift employees are required to self-monitor Masks are to be worn by all employees and visitors when in common spaces and Masks are to be worn by all employees and visitors when in common spaces and Increased signage has been added throughout the facility. Hand sanifizer and acemasks are available to staff as are sanitizing wipes for frequent disinfecting. acemasks are available to staff as are sanitizing wipes for frequent disinfecting. ncreased signage has been added throughout the facility. Hand sanitizer and Enhanced environmental controls. Housekeeping cleans the facility nightly. Enhanced environmental controls. Housekeeping cleans the facility nightly Engineering/Administrative Controls Engineering/Administrative Controls increase physical distance between staff when possible. increase physical distance between staff when possible. for symptoms (includes taking temperature). for symptoms (includes taking temperature), some staff working remotely where feasible. unable to socially distance. unable to socially distance. general public who may be infected with general public who may be infected with occupational contact inside six feet with occupational contact inside six feet with suspected to be infected with the SARSsuspected to be infected with the SARS-SARS-CoV-2, but who are not known or SARS-CoV-2, but who are not known or other employees, other persons, or the other employees, other persons, or the Jobs that require more than minimal Jobs that require more than minimal Description of hazard(s): Description of hazard(s): Job Task/Employee/Job Category RAF Administrative Office - Suire 204 Job Task/Employee/Job Category RAF Administrative Office - Suite 200 Check the appropriate box for each Check the appropriate box for each hazard: × Very High Very High Medium Medium Lower Lower High High

I certify that the above hazard assessment was performed to the best of my knowledge and ability, based on the hazards present on this date.

(signature)

7/27/20

COVID-19 HAZARD ASSESSMENT

Evaluator: Tammy Gressly Department/Division: Radiologic Associates of Fredericksburg

Date: August 14, 2020

	PPE	dasks	PPE	Onsite VIVA: Masks Gloves Gloves Gowns Face Shields Onsite MWH/SH: MWHC provides: Masks, including N95 Gloves Gowns Face Shields
	Engineering/Administrative Controls	Prior to the commencement of each shift employees are required to self-monitor for Masks symptoms (includes taking temperature when reasonably feasible). Masks are to be worn by all employees and visitors when in common spaces and unable to socially distance. Increase physical distance between staff when possible. Some radiologists have remote home read stations. Increased signage has been added throughout the facility. Hand sanitizer and facemasks are available to staff as are sanitizing wipes for frequent disinfecting. Enhanced environmental controls. Housekeeping cleans the facility nightly.	Engineering/Administrative Controls	Onsite at VIVA: Medium Risk Prior to the commencement of each shift employees are required to self-monitor for symptoms (includes taking temperature when reasonably feasible). Masks are to be worn by all employees and visitors when in common spaces and unable to socially distance. Increase physical distance between staff when possible. Increased signage has been added throughout the facility. Hand sanitizer and facemasks are available to staff as are sanitizing wipes for frequent disinfecting. Enhanced environmental controls. Housekeeping cleans the facility nightly Onsite at MWH/SH: High Risk Determined by MWHC.
RAF Diagnostic Radiologists	Description of hazard(s):	Jobs that require more than minimal occupational contact inside six feet with other employees, other persons, or the general public who may be infected with SARS-CoV-2, but who are not known or suspected to be infected with the SARS-CoV-2 virus.	Description of hazard(s):	Onsite at VIVA: Medium Risk Jobs that require more than minimal occupational contact inside six feet with other employees, other persons, or the general public who may be infected with SARS-CoV-2, but who are not known or suspected to be infected with the SARS-CoV-2 virus. Onsite at MWH/SH: High Risk Job tasks are those in places of employment with high potential for employee exposure to known or suspected sources of COVID-19 during specific medical, postmortem or laboratory procedures.
Job Task/Employee/Job Category RAF Diagnostic Radiologists	Check the appropriate box for each hazard:	b Categor	Check the appropriate box for	Very High X (MWH/SH) High Medium X (VIVA) Lower

I certify that the above hazard assessment was performed to the best of my knowledge and ability, based on the hazards present on this date.

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(signature)

COVID-19 HAZARD ASSESSMENT

Evaluator: Lindsey Murphy-O'BrienDepartment/Division: VIVA-Richmond/Dominion Imaging

Date: August 11, 2020

Job Task/Employee/Job Category VIVA Richmond Clerical	IVA Richmond Clerical		
Check the appropriate box for each hazard:	Description of hazard(s):	Engineering/Administrative Controls	PPE
Very High	Jobs that require more than	Prior to the commencement of each shift	Mocks
High	minimal occupational contact	employees are required to self-monitor for	
Medium X	inside six feet with other	symptoms (includes taking temperature).	Gloves
Lower	ons, or o may be V-2, but	employees, other persons, or the general public who may be visitors when in common spaces and unable to infected with SARS-CoV-2, but socially distance.	
	who are not known or suspected to be infected with the SARS-CoV-2 virus.	Increase physical distance between staff when possible.	
		Install physical barriers where possible.	
		Implement telehealth visits and virtual meetings.	
		Screening of all patients and visitors.	
		Enhanced environmental controls.	
Job Task/Employee/Job Category VIVA Richmond Clinical	/A Richmond Clinical		
Check the appropriate box for each hazard:	Description of hazard(s):	Engineering/Administrative Controls	PPE
Very High	Jobs that require more than	Prior to the commencement of each shift	Masks
High	ct	employees are required to self-monitor for	
Medium X		symptoms (includes taking temperature).	Gloves
Lower	employees, other persons, or the general public who may be	employees, other persons, or the general public who may be with a worn by all employees and	Gowns Face Shields
	infected with SARS-CoV-2, but who are not known or	infected with SARS-CoV-2, but socially distance.	

		possible.	
		Install physical barriers where possible.	
		Implement telehealth visits and virtual meetings.	
		Screening of all patients and visitors.	
		Enhanced environmental controls.	
Job Task/Employee/Job Category VIVA- Richmond Mid-Levels	/A- Richmond Mid-Levels		
Check the appropriate box for each hazard:	Description of hazard(s):	Engineering/Administrative Controls	PPE
Very High	Jobs that require more than	Prior to the commencement of each shift	MASeks
High	č	.	00000
Medium X			Gloves
Lower	employees, other persons, or the general public who may be infected with SARS-CoV-2, but who are not known or	employees, other persons, or the general public who may be visitors when in common spaces and unable to Face Shields socially distance.	Gowns Face Shields
	led with	Increase physical distance between staff when possible.	
		Install physical barriers where possible.	
		Implement telehealth visits and virtual meetings.	
		Screening of all patients and visitors.	
		Enhanced environmental controls.	

	PPE	Masks		Gloves	Gowns	Face Shields					
	Engineering/Administrative Controls				employees, other persons, or Masks are to be worn by all employees and the general public who may he	infected with SARS-Cov-2, but socially distance.	Increase physical distance between staff when possible.	Install physical barriers where possible.	Implement telehealth visits and virtual meetings.	Screening of all patients and visitors.	Enhanced environmental controls.
minion Imaging Clinical	Description of hazard(s):	Jobs that require more than	minimal occupational contact	inside six feet with other	employees, other persons, or the general public who may be	infected with SARS-CoV-2, but who are not known or	suspected to be infected with the SARS-CoV-2 virus.				
Job Task/Employee/Job Category Dominion Imaging Clinical	Check the appropriate box for each hazard:	Very High	High	Medium X	Lower						

certify that the above hazard assessment was performed to the best of my knowledge and ability, based on the hazards present on this date. __ (signature)

Evaluator: Jennifer Dawson Department/Division: RAF employees working in MWHC Facility

Date: August 11, 2020

Very High XJob tasks are those in places of employment with highDetermined by MWHC.Provided by MWHC:HighPotential for employeeMasks, including N95Lowersuspected sources of COVID-19GlovesHighduring specific medical, postmortem or laboratoryGownsLowerPAPR		Description of hazard(s):	Engineering/Administrative Controls	PPE
High employment with high potential for employee exposure to known or suspected sources of COVID-19 during specific medical, postmortem or laboratory Lower postmortem or laboratory Lower postmortem or laboratory Lower procedures.		1 + control of the co	**************************************	
Medium potential for employee exposure to known or suspected sources of COVID-19 during specific medical, postmortem or laboratory Lower procedures. Masks, including N95 Gloves Gowns Face Shields PAPR		o lasks are mose in places of	Determined by MWHC.	Provided by MWHC:
Lower suspected sources of COVID-19 High during specific medical, Medium postmortem or laboratory Lower procedures.	um	ntential for employee		Masks, including N95
High during specific medical, Medium postmortem or laboratory Lower procedures.				Gloves
Medium postmortem or laboratory Face Shields Lower PAPR		ring specific medical.		
Lower Face Shields PAPR		stmortem or laboratory		SOWERS
PAPR		ocedures.		Face Shields
				PAPR
			- Application -	

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COVID-19 HAZARD ASSESSMENT

Evaluator: Jennifer Dawson Department/Division: VIVA

Date: August 11, 2020

Job Task/Employee/Job Category	VIVA Clerical		
Check the appropriate box for each hazard:	.h Description of hazord(s):	Engineering/Administrative Controls	344
Very High	Jobs that require more than	1. Prior to the commencement of each	Macke
High	minimal occupational contact	shift employees are required to self-	
Medium X	inside six feet with other	monitor for symptoms (includes taking	Gloves
Lower	employees, other persons, or	temperature).	
	the general public who may be	2. Masks are to be worn by all employees	Manual National Natio
	infected with SARS-CoV-2, but	and visitors when in common spaces	
	who are not known or	and unable to socially distance.	
	suspected to be infected with	3. Increase physical distance between staff	8
	the SARS-CoV-2 virus.	when possible.	
		4. Install physical barriers where possible.	
		5. Implement telehealth visits and virtual	
		meetings.	
		6. Screening of all patients and visitors.	
		7. Enhanced environmental controls.	***************************************
Job Task/Employee/Job Category	VIVA Clinical		A THE PARTY AND A THE PARTY AN
Check the appropriate box for each hazard:	Description of hazard(s):	Engineering/Administrative Controls	366
Very High	Jobs that require more than	1. Prior to the commencement of each	Mark
High	minimal occupational contact	shift employees are required to self-	
Medium X	inside six feet with other	monitor for symptoms (includes taking	Gloves
Ower	employees, other persons, or	temperature).	30WOF
	the general public who may be	2. Masks are to be worn by all employees	
	infected with SARS-CoV-2, but	and visitors when in common spaces	Face Shields
	who are not known or	and unable to socially distance.	
	suspected to be infected with	3. Increase physical distance between staff	
	the SARS-CoV-2 virus.	when possible.	
		4. Install physical barriers where possible.	
www.doli.virginia.gov			7/27/20

		5. Implement telehealth visits and virtual	
		meetings. 6. Screening of all patients and visitors. 7. Enhanced environmental controls.	
Job Task/Employee/Job Cafegory	VIVA Midleveis		
Check the appropriate box for each hazard:	·	Engineering/Administrative Controls	PPE
Very High	Jobs that require more than	1. Prior to the commencement of each	Macke
High	minimal occupational contact	shift employees are required to self-	
Medium X	inside six feet with other	monitor for symptoms (includes taking	Gloves
Lower	employees, other persons, or		Gowns
	the general public who may be	2. Masks are to be worn by all employees	1
	infected with SARS-COV-2, but who are not known or	and visitors when in common spaces	race snielas
	suspected to be infected with	3. Increase physical distance between staff	
	the SARS-CoV-2 virus.	-	
	And the second control of the second control		
		5. Implement telehealth visits and virtual	
	Ad-Ad-44	meetings.	
		6. Screening of all patients and visitors.	
		/. Enfanced environmental controls.	
Job Task/Employee/Job Category	WI Clinicals		
Check the appropriate box for each hazard:	Description of hazard(s):	Engineering/Administrative Controls	3dd
Very High	Jobs that require more than	1. Prior to the commencement of each	AAAcke
High	minimal occupational contact	shift employees are required to self-	SACONA.
Medium X	inside six feet with other	monitor for symptoms (includes taking	Gloves
Lower	employees, other persons, or		Gowns
	infected with CARC-COV-2 but	2. Masks are to be worn by all employees	Fore Chields
	who are not known or	and unable to socially distance	
	suspected to be infected with	3. Increase physical distance between staff when possible.	
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	the SARS-CoV-2 virus.	 Install physical barriers where possible. Implement telehealth visits and virtual 	3
		 Screening of all patients and visitors. Enhanced environmental controls 	
Job Task/Employee/Job Calegory	VIVA Cosmetics		
Check the appropriate box for each hazard:		Engineering/Administrative Controls	3dd
Very High	Jobs that require more than	1. Prior to the commencement of each	MACE LE
High	minimal occupational contact	shift employees are required to self-	
Medium X	inside six feet with other	monitor for symptoms (includes taking	Gloves
Lower	employees, other persons, or the general public who may be infected with SARS-CoV-2, but who are not known or suspected to be infected with the SARS-CoV-2 virus.	temperature). 2. Masks are to be worn by all employees and visitors when in common spaces and unable to socially distance. 3. Increase physical distance between staff when possible. 4. Install physical barriers where possible. 5. Implement telehealth visits and virtual meetings. 6. Screening of all patients and visitors. 7. Enhanced environmental controls.	Gowns Face Shields
I certify that the above hazard	d assessment was performed to the be	certify that the above hazard assessment was performed to the best of my knowledge and ability, based on the hazards present on this date.	ds present on this date.
つ		or and the control of	

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Evaluator: Jennifer Dawson Department/Division: MIM employees working in MWHC Facility

August 11, 2020

Date:

Job Task/Employee/Job Category MIM Midlevels	Midlevels		19. 10. 11. 11. 11. 11. 11. 11. 11. 11. 11
Check the appropriate box for each hazard:	Description of hazard(s):	Engineering/Administrative Controls	PPE
Very High X	Job tasks are those in	Determined by WWILL	
High	places of employment		Provided by MWHC:
Medium	with high potential for		Masks, including N95
Lower	employee exposure to known or granected		Gloves
High	sources of COVID-19		
Medium	during specific medical.		SIMO
Lower	postmortem or		Face Shields
	laboratory procedures.		PAPR

I certify that the above hazard assessment was performed to the best of my knowledge and ability, based on the hazards present on this date. (signature)

7/27/20

Attachment B - RAF Policies and Procedures for Potential COVID-19 Exposure to Employee in Workplace

Radiologic Associates of Fredericksburg (RAF), Ltd. and Related Entities

Policies and Procedures for Potential COVID-19 Exposure to Employee in Workplace

Created: August 2020

Approved: CEO

Policy

Radiologic Associates of Fredericksburg (RAF) and its related entities, hereafter referred to as the "Practice", has established this policy and procedure to promptly and accurately receive, respond, track, and notify exposed employees and patients when there is a patient or visitor in the facility who subsequently tests positive for COVID-19.

Procedure:

Patient COVID-19 Positive:

- 1. After receiving notification that a patient has tested positive for COVID-19, Operations Manager/Director of the facility will notify the Director of Administrative Operations and the HR Manager of the positive result and the following information:
 - a. Date the patient was last seen in the facility;
 - b. List of all employees/physicians that had potential contact with patient;
 - c. Date the patient subsequently tested positive for COVID-19.
- 2. The Director of Administrative Operations or HR Manager will notify all employees/physicians who were potentially exposed to the patient within 24 hours of discovery of their possible exposure via email which will include the following information:
 - a. Date of the potential exposure to the positive COVID-19 patient;
 - b. A 14-day self-monitoring tracking form to complete and return at the end of the 14-days.
 - c. The Practice will **not** disclose and will keep strictly confidential the identity of the individual known to be infected with COVID-19 in accordance with applicable laws and regulations.
- 3. The clinical facility Director/Operations Manager will notify the Virginia Department of Health (VDH) in the county/city where the positive COVID-19 patient resides within 24 hours of the discovery of the positive case. Of note, the testing facility where the patient received the positive test results is also required to report the results to the VDH.

- 4. The Director of Administrative Operations or HR Manager will notify the executive team (CEO, COO and Executive Director Technical and Clinical Services) with the incident details to include the following:
 - a. Date the patient was last treated in the facility;
 - b. Date we received notification of the positive results;
 - c. Number of employees/physicians possibly exposed.
 - d. Except where permitted or required by applicable law, the Practice will **not** disclose and will keep strictly confidential the identity of the individual known to be infected with COVID-19 in accordance with applicable laws and regulations.
- 5. If any employee or physician becomes symptomatic and/or tests positive for COVID-19, the Director of Administrative Operations or HR Manager will follow the "Policies and Procedures for Employee Symptomatic for COVID-19" or "Policies and Procedures for Employee Positive for COVID-19".

Third-Party COVID-19 Positive:

- 1. If any Practice location receives notification that a third-party (contractor, vendor, custodian, or other individual not an employee or patient) has tested positive for COVID-19 after being in one of the Practice locations, the Director of Administrative Operations and HR Manager are to be notified immediately with the following information:
 - a. Third-party information;
 - b. Date the third-party was in the facility;
 - c. List of all employees/physicians that had potential contact with third-party;
 - d. Date the third-party subsequently tested positive for COVID-19.
- 2. The Director of Administrative Operations or HR Manager will notify all employees/physicians who were potentially exposed to the third-party within 24 hours of discovery of their possible exposure via email which will include the following information:
 - a. Date of the potential exposure to a third-party who subsequently tested positive for COVID-19;
 - b. A 14-day self-monitoring tracking form to complete and return at the end of the 14- days.
 - c. The Practice will **not** disclose and will keep strictly confidential the identity of the individual known to be infected with COVID-19 in accordance with applicable laws and regulations.
- 3. The HR Manager or Director of Administrative Operations will notify the executive team (CEO, COO and Executive Director Technical and Clinical Services) with the incident details to include the following:
 - a. Date the third-party was in the facility;
 - b. Date we received notification of the positive results;
 - c. Except where permitted or required by applicable law, the Practice will **not** disclose and will keep strictly confidential the identity of the individual known to be infected with COVID-19 in accordance with applicable laws and regulations.

4. If any employee or physician becomes symptomatic and/or tests positive for COVID-19, the Director of Administrative Operations or HR Manager will follow the "Policies and Procedures for Employee Symptomatic for COVID-19" or "Policies and Procedures for Employee Positive for COVID-19".

Expiration: This policy will expire on 12/31/2020 or upon expiration of the Governor's State of Emergency for COVID-19.

Attachment C - RAF Policies and Procedures for Symptomatic COVID-19 Employee

Radiologic Associates of Fredericksburg (RAF), Ltd. and Related Entities

Policies and Procedures for Symptomatic COVID-19 Employee

Created: July 2020

Approved: CEO

Policy:

Radiologic Associates of Fredericksburg (RAF) and its related entities, hereafter referred to as the "Practice", has developed this policy and procedure for employees to report when they are experiencing symptoms consistent with COVID-19, and no alternative diagnosis has been made (e.g., tested positive for influenza). Such employees shall be designated as "suspected to be infected with SARS-CoV-2 virus". The Practice will promptly and accurately identify, respond, track, and notify exposed individuals once notified that the employee is experiencing COVID-19 symptoms within the facility or who was in the facility 48 hour prior to exhibiting symptoms.

Procedure:

- 1. Employees are to immediately notify the Director of Administrative Operations or HR Manager should they begin experiencing any COVID-19 symptoms.
 - a. The Director of Administrative Operations or HR Manager will immediately isolate the employee away others in a designated area and ask the employee to wear a face covering (if not already wearing one).
- 2. The Director of Administrative Operations or HR Manager so an assessment can be performed and to determine if the person needs immediate medical care or can safely be sent home.
- 3. The Director of Administrative Operations or HR Manager will perform a risk assessment to determine the following:
 - a. If the employee had any known exposure to someone with COVID-19 and if so where that exposure occurred;
 - b. Has the employee been tested for COVID-19;
 - c. Location of the employee's COVID-19 testing facility if tested;
 - d. Date results of COVID-19 test are expected;
 - e. Date the employee last worked in the facility;
 - f. Date symptoms first appeared;
 - g. Who the employee had contact with in the workplace 48 hours prior to being symptomatic (if possible, names of employees, patients, and physicians). Specifics of these contacts should include if both parties were masked during the contact, duration of the contact, and distance during the contact.

- h. The Director of Administrative Operations or HR Manager will **not** disclose and will keep strictly confidential the identity of the individual known to be infected with COVID-19 in accordance with applicable laws and regulations.
- 4. The Director of Administrative Operations or HR Manager will notify the executive team (CEO, COO and Executive Director Technical and Clinical Services) with the incident details to include the following:
 - a. Risk level to employees, physicians, and patients based on risk assessment of the situation:
 - b. Details of the incident and risk assessment to be included are:
 - a. Facility location;
 - b. Date that employee last worked in the facility;
 - c. When the employee became symptomatic;
 - d. Status of PPE of the employee;
 - e. Status of contact with others (employees, physicians, patients, etc.)
 - f. Status of PPE of those who the employee had contact with;
 - g. If available, the specifics of the exposure to others and if it occurred within 48 hours of the employee becoming symptomatic; and
 - h. Quarantine status pending test results of the employee.
 - c. Except where permitted or required by applicable law, the Practice will not disclose and will keep strictly confidential the identity of the individual known to be infected with COVID-19 in accordance with applicable laws and regulations.
- 5. If the employee tests positive for COVID-19, the Director of Administrative Operations or the HR Manager will follow the "Policies and Procedures for Employee Positive for COVID-19".

Expiration: This policy will expire on 12/31/2020 or upon expiration of the Governor's State of Emergency for COVID-19.

Attachment D - RAF Policies and Procedures for Employee Positive for COVID-19

Radiologic Associates of Fredericksburg (RAF), Ltd. and Related Entities

Policies and Procedures for Employee Positive for COVID-19

Created: July 2020

Approved: CEO

Policy

Radiologic Associates of Fredericksburg (RAF) and its related entities, hereafter referred to as the "Practice", has established this policy and procedure to promptly and accurately identify, respond, track, and notify exposed employees and patients when there is a positive test result of COVID-19 of an employee within the facility.

Procedure:

- 1. An Employee with a positive COVID-19 test result will notify the Director of Administrative Operations or HR Manager.
- 2. The Director of Administrative Operations or HR Manager will perform a risk assessment to determine the following:
 - a. If the employee had any known exposure to someone with COVID-19 and if so where that exposure occurred;
 - b. Date the employee tested positive for COVID-19;
 - c. Location of the employee's COVID-19 testing facility;
 - d. Date the employee last worked in the facility;
 - e. Date symptoms first appeared;
 - f. Who the employee had contact with in the workplace 48 hours prior to being symptomatic (if possible, names of employees, patients, and physicians). Specifics of these contacts should include if both parties were masked during the contact, duration of the contact, and distance during the contact.
- 3. Within 24 hours of receiving the notification of a positive test result, the Director of Administrative Operations or HR Manager will notify the following:
 - a. The Virginia Department of Health (VDH) in the county/city where the employee resides. Of note, the testing facility where the employee received the positive test results is also required to report the results to the VDH.
 - b. Any employee or physician identified to have had contact with the positive employee during the longer of 14 days prior to the date of the positive test or 48 hours prior to the positive employee being symptomatic will be informed via email they may have had contact with someone who has tested positive for COVID-19. Email communication will include:

- i. Date of the potential exposure.
- ii. A 14-day self-monitoring tracking form for the exposed employee to complete and return at the end of the 14-day period.
- iii. The Practice will **not** disclose and will keep strictly confidential the identity of the individual known to be infected with COVID-19 in accordance with applicable laws and regulations.
- c. Workers' Compensation carrier to determine if this is a covered incident.
 - i. If determined not to be work-related, no further action is needed.
 - ii. If determined to be work-related, the incident must be documented on the OSHA 500 log. The HR Manager will work with the Compliance Coordinator to ensure this is documented accordingly.
- d. The executive team (CEO, COO and Executive Director Technical and Clinical Services) with the incident details to include the following:
 - i. Risk level to employees, physicians, and patients based on risk assessment;
 - ii. Details of the incident and risk assessment which include:
 - 1. Facility location;
 - 2. Date that employee last worked in the facility;
 - 3. When the employee became symptomatic;
 - 4. Status of PPE of the employee;
 - 5. Status of contact with others (employees, physicians, patients, etc.)
 - 6. Status of PPE of those who had contact;
 - 7. If available, the specifics of the exposure to others and if it occurred within 48 hours of the employee becoming symptomatic; and
 - 8. Quarantine status of the positive employee; and
 - 9. Status of exposed employees (if they are quarantined, teleworking, or under FFCRA emergency sick leave).
 - iii. Except where permitted or required by applicable law, the Practice will not disclose and will keep strictly confidential the identity of the individual known to be infected with COVID-19 in accordance with applicable laws and regulations
- e. Environmental Services to request additional cleaning if deemed necessary by the risk assessment and guidance of the VDH and CDC. Where feasible, the Practice will restrict access to the areas in the place of employment where the infected individual accessed or worked. Where feasible, a period of 24 hours will be observed prior to cleaning and disinfecting such areas.
- f. The building landlord. The Practice will **not** disclose and will keep strictly confidential the identity of the individual known to be infected with COVID-19 in accordance with applicable laws and regulations
- g. Any vendors, contractors, or other employers whose employees were present at the work site during the same time period. The Practice will **not** disclose and will keep strictly confidential the identity of the individual known to be infected with COVID-19 in accordance with applicable laws and regulations

- h. The Virginia Department of Labor and Industry within 24 hours of the discovery in the event three (3) or more employees present at the place of employment within a 14-day period test positive for SARS-COV-2 virus during that 14-day time period.
- 4. If exposure to patients occurred, the facility leadership will coordinate scripted notification to the affected patients. This is determined by the risk assessment and guidance from the VDH and CDC. At the VIVA facility, Clientele can be utilized to send out a recorded message to all patients who were affected. The Practice will **not** disclose and will keep strictly confidential the identity of the individual known to be infected with COVID-19 in accordance with applicable laws and regulations.

Expiration: This policy will expire on 12/31/2020 or upon expiration of the Governor's State of Emergency for COVID-19.

Attachment E - RAF Policies and Procedures for COVID-19 Positive Employee Return to Work

Radiologic Associates of Fredericksburg (RAF), Ltd. and Related Entities

Policies and Procedures for COVID-19 Positive Employee Return to Work

Created: August 2020

Approved: CEO

Policy

Radiologic Associates of Fredericksburg (RAF) and its related entities, hereafter referred to as the "Practice", will establish a return to work procedure for symptomatic and asymptomatic employees who are known or suspected to be infected with the COVID-19 virus using the appropriate symptom- or time-based strategy as noted below.

Procedure:

Symptomatic Employees with known or suspected COVID-19

- 1. For symptomatic employees known or suspected to be infected with the COVID-19 virus, an employee's return to work will be determined by the symptom-based strategy.
- 2. When using the symptom-based strategy, employees will be excluded from returning to work until 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.
- 3. A release/return to work note from an appropriate healthcare professional concerning when an employee has satisfied the symptoms-based strategy will also be accepted as compliance with this requirement.
- 4. Serologic testing, also known as antibody testing, shall not be used to make decisions about returning employees to work who were previously classified as known or suspected to be infected.

Asymptomatic Employees with known or suspected COVID-19

- 1. For asymptomatic employees known or suspected to be infected with the COVID-19 virus, an employee's return to work will be determined by the time-based strategy.
- 2. When using the time-based strategy, employees will be excluded from returning to work
- 3. until at least 10 days have passed since the date of their first positive COVID-19 diagnostic test assuming they have not subsequently developed symptoms since their positive test. If they develop symptoms, the symptom-based strategy as noted above will be used.

- 4. A release/return to work note from an appropriate healthcare professional concerning when an employee has satisfied the time-based strategy will also be accepted as compliance with this requirement.
- 5. Serologic testing, also known as antibody testing, shall not be used to make decisions about returning employees to work who were previously classified as known or suspected to be infected.

Optional testing of employees with known or suspected COVID-19

- For symptomatic and asymptomatic employees known or suspected to be infected with the COVID-19 virus, the Practice may also elect to allow an employee to return to work by the testing-based strategy.
- 2. The test-based strategy excludes an employee from returning to work until (i) resolution of any fever without the use of fever-reducing medications, (ii) improvement in any respiratory symptoms (e.g., cough, shortness of breath), and (iii) negative results of an FDA Emergency Use Authorized COVID-19 molecular assay for detection of SARSCoV-2 RNA from at least two consecutive respiratory specimens collected 24 hours or more apart (total of two negative specimens). The Practice does not require the employee to pay for the cost of COVID-19 testing for return to work determinations.

Work Restriction and Testing for Asymptomatic Employees Following Exposure to Patients, Visitors, or Others in the Workplace

- 1. Where an employee may be exposed in the course of providing health care services in the workplace, the Practice will conduct a risk assessment to determine any work restrictions or other necessary actions.
- 2. These decisions will be made consistent with the VDH's <u>Guidance for Assessing and Managing Expose</u>, <u>Asymptomatic Health Care Personnel</u> as well as the CDC's <u>Interim U.S. Guidance for Risk Assessment and Work Restrictions for Healthcare Personnel with Potential Exposure to COVID-19</u> (last updated on May 29, 2020), CDC's <u>Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19</u>, and other guidance as it is updated and available.

Expiration: This policy will expire on 12/31/2020 or upon expiration of the Governor's State of Emergency for COVID-19.

Attachment F - FFCRA Emergency Paid Sick Leave Policy

Radiologic Associates of Fredericksburg, Ltd. and Related Entities

Policies and Procedures for FFCRA Emergency Paid Sick Leave

Created: July 20, 2020

Approved: CEO

Purpose:

Radiologic Associates of Fredericksburg (RAF) and its related entities, hereafter referred to as the "Practice", have established this policy and procedure in accordance with state and federal mandates in relation to COVID-19 and emergency paid sick leave for all eligible employees as defined in the Family First Coronavirus Response Act (FFCRA).

Policy:

It is the Practice's policy to offer eligible employees emergency paid sick leave in accordance with the FFCRA.

Scope:

<u>Eligible Employees</u>: All active employees are eligible to receive this entitlement. For the avoidance of doubt, furloughed employees are not active employees for the purposes of this policy.

<u>Reason for Leave</u>: You may be eligible take emergency paid sick leave if you are unable to work (or work from home) because:

- 1. You are subject to a federal, state, or local quarantine or isolation order related to COVID-19:
- 2. You have been advised by a health care provider to self-quarantine because you of concerns related to have COVID-19, may have COVID-19, or are particularly vulnerable to COVID-19;
- 3. You are experiencing symptoms of COVID-19 and are seeking a medical diagnosis;
- 4. You are caring for an individual who either is subject to a quarantine or isolation order related to COVID-19 or have been advised by a health care provider to self-quarantine due to concerns related to COVID-19;
- 5. You are caring for your child whose school or place of care is closed, or whose childcare provider is unavailable, due to COVID-19 related reasons; or

6. You are experiencing substantially similar conditions as specified by the Secretary of Health and Human Services.

For purposes of #4, an employee may take paid sick leave under the FFCRA to care for an immediate family member or someone who regularly resides in their home. The employee may also take paid sick leave under the FFCRA to care for someone where their relationship creates an expectation that they care for the person in a quarantine or self-quarantine situation, and that individual depends on them for care during the quarantine or self-quarantine. An employee may not take paid sick leave under the FFCRA to care for someone with whom they have no relationship.

For purposes of this policy, "child" includes an employee's biological, adopted, or foster child, stepchild, legal ward, or child for whom the employee is standing in loco parentis (i.e., day-to-day responsibilities to care for or financially support a child). Additionally, "child" also includes an adult son or daughter (i.e., one who is 18 years of age or older), who (1) has a mental or physical disability, and (2) is incapable of self-care because of that disability.

Duration

Employees are entitled to:

- Full-time employees are eligible for 80 hours of leave.
- Part-time employees are eligible for the number of hours they work, on average, over a two-week period. For purposes of this policy, a part-time employee is an employee who is normally scheduled to work fewer than forty (40) hours each workweek or—if the employee lacks a normal weekly schedule—who is scheduled to work, on average, fewer than forty (40) hours each workweek.

Procedure:

Compensation

- Leave will be paid at an employee's regular rate of pay, subject to a limit of \$511 per day and \$5,110 in total, when leave is taken for reasons 1, 2, or 3, as stated above.
- Leave will be paid at 2/3 of an employee's regular rate of pay, subject to a limit of \$200 per day and \$2,000 in total, when leave is taken for reasons 4, 5, or 6, as stated above.

Leave Rules

 You may elect to use emergency paid sick leave before using any other accrued paid leave.

- Leave provided by the Practice before April 1, 2020 will not count against your Families First Coronavirus Response Act (FFCRA) leave.
- Emergency paid sick leave cannot be carried over after December 31, 2020.

Requesting Leave

If you need to take emergency paid sick leave, provide notice as soon as possible. Normal call-in procedures apply to all absences from work. If an employee is incapacitated, the employee's representative should give notice as soon as possible.

Documentation

If requesting emergency paid sick leave, please complete and return the FFCRA Emergency Sick Leave Election Form. The FFCRA Emergency Sick Leave Election Form can be obtained from the Director of Administrative Operations or the HR Manager for employee requests and from the Manager of Provider Support Services for physician requests.

Retaliation

The Practice will not discriminate or retaliate against anyone for exercising or attempting to exercise their right to take leave under the FFCRA or who requests or takes leave in accordance with this policy.

Expiration: This policy will expire on 12/31/2020 or upon expiration of the Governor's State of Emergency for COVID-19.

Attachment G - RAF Policies and Procedures for Potential COVID-19 Exposure to Employee Outside of Work

Radiologic Associates of Fredericksburg (RAF), Ltd. and Related Entities

Policies and Procedures for Potential COVID-19 Exposure to Employee Outside of Work

Created: August 2020

Approved: CEO

Policy

Radiologic Associates of Fredericksburg (RAF) and its related entities, hereafter referred to as the "Practice", has established this policy and procedure to promptly and accurately identify, track, and respond to an employee who is exposed to someone who has tested positive for COVID-19 and resides in the employees' home.

Procedure:

- 1. After receiving notification from an employee about Close Contact from a person known or suspected to be infected with COVID-19, the Director of Administrative Operations or HR Manager who will perform a risk assessment to determine the following:
 - a. Date the household member tested positive for COVID-19;
 - b. If the employee has developed any COVID-19 symptoms;
 - c. If the employee has been directed to or has received a COVID-19 test.
- 2. Note that "Close Contact" includes (i) for at least 15 minutes being within 6 feet of someone who is known/suspected to be infected with COVID-19, (ii) providing care to someone who is sick and known/suspected to be infected with COVID-19, (iii) direct physical contact with a person known/suspected to be infected with COVID-19 (touching, hugging, kissing, etc.), (iv) sharing eating or drinking utensils with someone who is known/suspected to be infected with COVID-19, or (v) where a person known/suspected to be infected with COVID-19 has sneezed, coughed, or somehow gotten respiratory droplets on you.
- 3. The employee will be instructed to follow the recommendations of the Virginia Health Department (VDH) regarding the number of days required to self-quarantine. This currently is 14 days past the date the Close Contact.
- 4. The Director of Administrative Operations or HR Manager will notify the executive team (CEO, COO and Executive Director Technical and Clinical Services) with the incident details to include the following:
 - a. Date of the Close Contact;
 - b. Date the employee was tested for COVID-19, if applicable;
 - c. Results of COVID-19 tests when received.

- d. Except where permitted or required by applicable law, the Practice will **not** disclose and will keep strictly confidential the identity of the individual known to be infected with COVID-19 in accordance with applicable laws and regulations.
- 5. If an employee who is under self-quarantine become symptomatic or tests positive for COVID-19, the Director of Administrative Operations or HR Manager will perform a risk assessment to determine if there has been any exposure within the workplace. If positive exposure to staff is determined, the Director of Administrative Operations or HR Manager will then follow the "Policies and Procedures for Employee Positive for COVID-19" or "Policies and Procedures for Employee Symptomatic for COVID-19".

Expiration: This policy will expire on 12/31/2020 or upon expiration of the Governor's State of Emergency for COVID-19.