

COVID-19 Plan Template

- OSHA’s COVID-19 Healthcare Emergency Temporary Standard (ETS), paragraph (c), requires employers to develop and implement a COVID-19 plan for each workplace to protect workers from COVID-19. If an employer has more than 10 employees, the plan must be written. Employers may use this template to develop a COVID-19 plan for their workplace.
- If employers choose to use this template, there are 2 STEPS to complete:
 - STEP 1: Determine if OSHA’s COVID-19 Healthcare ETS applies to your workplace or portions of your workplace.
 - STEP 2: Customize this COVID-19 plan template for your workplace.

STEP 1: Determine if the ETS applies to your workplace or portions of your workplace.

You may use the [“Is your workplace covered by the COVID-19 Healthcare ETS?”](#) flow chart to determine whether and how OSHA’s COVID-19 Healthcare ETS applies to your workplace. Note that this determination must be made for each workplace where your employees work.

STEP 2: Customize this COVID-19 plan template for your workplace.

Customize areas marked with blue text and modify (change, add, or remove sections of) this document until the plan accurately represents your policies. The plan must match the policies, procedures, and controls that will be implemented in the workplace, and must accurately describe what employees are expected to do. Consult with non-managerial employees and their representatives, if any, before finalizing this plan.

Therapy Today’s COVID-19 Plan

1. Purpose and Scope

[Employer name] is committed to providing a safe and healthy workplace for all our employees. Therapy Today has developed the following COVID-19 plan, which includes policies and procedures to minimize the risk of transmission of COVID-19, in accordance with OSHA’s COVID-19 Emergency Temporary Standard (ETS).

2. Roles and Responsibilities

Therapy Today’s goal is to prevent the transmission of COVID-19 in the workplace(s). Managers as well as non-managerial employees and their representatives are all responsible for supporting, complying with, and providing recommendations to further improve this COVID-19 plan.

The COVID-19 Safety Coordinator(s), listed below, implements and monitors this COVID-19 plan. The COVID-19 Safety Coordinator(s) has Therapy Today’s full support in implementing and monitoring this COVID-19 plan, and has authority to ensure compliance with all aspects of this plan.

Therapy Today and the COVID-19 Safety Coordinator(s) will work cooperatively with non-managerial employees and their representatives to conduct a workplace-specific hazard assessment and in the development, implementation, and updating of this COVID-19 plan.

Employee suggestions will be solicited by email and each concern will be addressed by the coordinator and integrated into the plan.

COVID-19 Safety Coordinator(s)		
Name Leslie Auld	Director	Auld.leslie@gmail.com

3. Hazard Assessment and Worker Protections

Therapy Today will conduct a workplace-specific hazard assessment of its workplace to determine potential workplace hazards related to COVID-19. A hazard assessment will be conducted initially and whenever changes at the workplace create a new potential risk of employee exposure to COVID-19 (e.g., new work activities at the workplace).

Fully vaccinated employees are exempt from the personal protective equipment (PPE), physical distancing, and physical barrier requirements of the ETS because there is no reasonable expectation that any person with suspected or confirmed COVID-19 will be present.

Patient Screening and Management

In settings where direct patient care is provided, Therapy Today will:

- Limit and monitor points of entry to the setting;
- Screen and triage all clients, patients, residents, delivery people, visitors, and other non-employees entering the setting for symptoms of COVID-19;
- [Encourage the use of telehealth services where available and appropriate in order to limit the number of people entering the workplace.]

Therapy Today limits the points of entry and the numbers by offering and encouraging telehealth services.

Face masks are made available in the common areas for any unvaccinated persons.

Paragraph (a)(4) of the ETS exempts fully vaccinated employees from the PPE requirements of the ETS when in well-defined areas where there is no reasonable expectation that any person with suspected or confirmed COVID-19 will be present.

Therapy Today will not prevent any employee from voluntarily wearing their own facemask and/or face shield in situations when they are not required unless doing so would create a hazard of serious injury or death, such as interfering with the safe operation of equipment.

Therapy Today and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees or representatives to assess and address COVID-19 hazards, including when there is employee exposure to people with suspected or confirmed COVID-19. [OSHA's [COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis](#) may be used.]

Physical Distancing

Therapy Today will ensure that each employee is separated from all other people in the workplace by at least 6 feet when indoors, unless it can be demonstrated that such physical distance is not feasible for a specific activity. Where maintaining 6 feet of physical distance is not feasible, Therapy Today will ensure employees are as far apart from other people as possible. Physical distancing will be implemented, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach.

[Employer name] and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to assess physical distancing in the workplace. [\[OSHA's COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis\]](#) may be used to identify, develop, and implement physical distancing measures for employee protection, and identify fixed work locations where physical distancing cannot be maintained between employees and co-workers, customers, visitors, and other non-employees, as well as controls and practices that can be implemented to protect employees in these fixed work locations.]

Employees are sufficiently distanced in separate rooms or with 6 feet distance from one another.

Employees are respectful of one another and do not congregate in common areas.

Telehealth and remote check in have been implemented to reduce traffic and promote/ensure distancing.

Physical Barriers

Therapy Today has installed physical barriers at patient check in as part of a multi-layered infection control approach.

Where feasible, **Therapy Today** will ensure that:

- Physical barriers are solid and made from impermeable materials;
 - Physical barriers are easily cleanable or disposable;
 - Physical barriers are sized (i.e., height and width) and located to block face-to-face pathways between individuals based on where each person would normally stand or sit;
 - Physical barriers are secured so that they do not fall or shift, causing injury or creating a trip or fall hazard;
 - Physical barriers do not block workspace air flow or interfere with the heating, ventilation, and air conditioning (HVAC) system operation;
 - Physical barriers are transparent in cases where employees and others have to see each other for safety; and
 - Physical barriers do not interfere with effective communication between individuals.
-
- Physical barriers are installed
 - Where:
 - Public facing fixed workstations (e.g., entryway/lobby, check-in desks, triage, hospital pharmacy windows, bill payment);
 - Security screening and checkpoints.
 - How:
 - Mounted securely to hard surfaces above the floor (e.g., benches, desks, countertops, production lines, vehicle interior surfaces); or

Cleaning and Disinfection

Therapy Today will implement policies and procedures for cleaning, disinfection, and hand hygiene, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach. **Therapy Today** and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to implement cleaning, disinfection, and hand hygiene in the workplace. [\[OSHA's COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis\]](#) may be used to assess COVID-19-related hazards and develop and implement policies and procedures for cleaning and disinfection.]

In patient care areas, resident rooms, and for medical devices and equipment:

Therapy Today will follow standard practices for cleaning and disinfection of surfaces and equipment in accordance with CDC's "[COVID-19 Infection Prevention and Control Recommendations](#)" and CDC's "[Guidelines](#)

[for Environmental Infection Control.](#)”

In all other areas:

[Therapy Today](#) requires the cleaning of high-touch surfaces at least once a day.

When a person who is COVID-19 positive has been in the workplace within the last 24 hours, [Therapy Today](#) requires cleaning and disinfection, in accordance with CDC’s “[Cleaning and Disinfecting Guidance](#),” of any areas, materials, and equipment that have likely been contaminated by that person (e.g., rooms they occupied, items they touched).

[Therapy Today](#) will provide alcohol-based hand rub that is at least 60% alcohol or provide readily accessible hand washing facilities.

Health Screening and Medical Management

Health Screening

[Therapy Today](#) will screen each employee before each work day and each shift.

[Employees will self-monitor for symptoms prior to coming in to work.](#)

Employee Notification to Employer of COVID-19 Illness or Symptoms

[Therapy Today](#) will require employees to promptly notify [[their supervisor or COVID-19 Safety Coordinator](#)] when they have tested positive for COVID-19 or been diagnosed with COVID-19 by a licensed healthcare provider, have been told by a licensed healthcare provider that they are suspected to have COVID-19, are experiencing recent loss of taste and/or smell with no other explanation, or are experiencing both fever ($\geq 100.4^{\circ}$ F) and new unexplained cough associated with shortness of breath.

[Employees will call or email the coordinator when they are experiencing symptoms.](#)

[Employees can use PTO or short or long term disability benefits to cover their necessary time off due to illness.](#)

Employer Notification to Employees of COVID-19 Exposure in the Workplace

[Therapy Today](#) will notify employees if they have been exposed to a person with COVID-19 at their workplace, as described below. The notification provisions below are not triggered by the presence of a patient with confirmed COVID-19 in a workplace where services are normally provided to suspected or confirmed COVID-19 patients (e.g., emergency rooms, urgent care facilities, COVID-19 testing sites, COVID-19 wards in hospitals). When [Therapy Today](#) is notified that a person who has been in the workplace (including employees, clients, patients, residents, vendors, contractors, customers, delivery people and other visitors, or other non-employees) is COVID-19 positive, [Therapy Today](#) will, within 24 hours:

- Notify each employee who was not wearing a respirator and any other required PPE and has been in close contact with the person with COVID-19 in the workplace. The notification must state the fact that the employee was in close contact with someone with COVID-19 along with the date(s) the contact occurred.
- Notify all other employees who were not wearing a respirator and any other required PPE and worked in a well-defined portion of a workplace (e.g., a particular floor) in which the person with COVID-19 was present during the potential transmission period. The notification must specify the date(s) the person with COVID-19 was in the workplace during the potential transmission period.
- Notify other employers whose employees were not wearing a respirator and any other required PPE and have been in close contact with the person with COVID-19, or worked in a well-defined portion of a workplace (e.g., a particular floor) in which that person was present, during the potential transmission period. The notification

must specify the date(s) the person with COVID-19 was in the workplace during the potential transmission period and the location(s) where the person with COVID-19 was in the workplace.

Notifications will not include the name, contact information, or occupation of the COVID-19 positive person.

Note: Close contact means being within 6 feet of the person for a cumulative total of 15 minutes or more over a 24-hour period during the person's potential transmission period. The potential transmission period runs from 2 days before the person felt sick (or, if not showing symptoms, 2 days before testing) until the time the person is isolated.

Therapy Today will notify employees of an exposure by email, text and telephone call.

Medical Removal from the Workplace

Therapy Today has also implemented a policy for removing employees from the workplace in certain circumstances.

Therapy Today will immediately remove an employee from the workplace when:

- The employee is COVID-19 positive (i.e., confirmed positive test for, or has been diagnosed by a licensed healthcare provider with, COVID-19);
- The employee has been told by a licensed healthcare provider that they are suspected to have COVID-19;
- The employee is experiencing recent loss of taste and/or smell with no other explanation; or
- The employee is experiencing both a fever of at least 100.4°F and new unexplained cough associated with shortness of breath.

[[Note: This list represents the minimum medical removal requirements for compliance with OSHA's COVID-19 ETS. The full list of COVID-19 symptoms provided by the CDC includes additional symptoms not listed above. Employers may choose to remove or test employees with additional symptoms from the CDC list, or refer the employees to a healthcare provider.]]

For employees removed because they are COVID-19 positive, Therapy Today will keep them removed until they meet the return-to-work criteria discussed below. For employees removed because they have been told by a licensed healthcare provider that they are suspected to have COVID-19, or are experiencing symptoms as discussed above, [Employer name] will keep them removed [until they meet the return-to-work criteria discussed below or keep them removed and provide a COVID-19 polymerase chain reaction (PCR) test at no cost to the employee. If the employee tests negative, they can return to work immediately. If the employee tests positive or refuses a test, they must remain excluded from the workplace until the return-to-work criteria below are met. If the employee refuses to take the test, [Employer name] will continue to keep the employee removed from the workplace, but is not obligated to provide the medical removal protection benefits discussed below (Note: absent undue hardship, employers must make reasonable accommodations for employees who cannot take the test for religious or disability-related medical reasons, consistent with applicable non-discrimination laws).]

If Therapy Today notifies an employee that they were in close contact with a person in the workplace (including employees, clients, patients, residents, vendors, contractors, customers, delivery people and other visitors, or other non-employees) who is COVID-19 positive when that employee was not wearing a respirator and any other required PPE, Therapy Today will immediately remove the employee from the workplace unless:

1. The employee does not experience recent loss of taste and/or smell with no other explanation, or fever of at least 100.4°F and new unexplained cough associated with shortness of breath; AND
2. The employee has either been fully vaccinated against COVID-19 (i.e., 2 weeks or more following the final dose) or had COVID-19 and recovered within the past 3 months.

Therapy Today will keep the employee removed from the workplace [for 14 days or will keep the employee removed and provide a COVID-19 test at least 5 days after the exposure at no cost to the employee. If the employee tests negative, they may return to work 7 days following exposure. If the employee tests positive, the employee must remain

excluded from the workplace until the return-to-work criteria below are met. If the employee refuses a test, [Employer name] will keep the employee excluded for 14 days, but is not obligated to provide the medical removal protection benefits discussed below (Note: absent undue hardship, employers must make reasonable accommodations for employees who cannot take the test for religious or disability-related medical reasons, consistent with applicable non-discrimination laws).]

Any time an employee must be removed from the workplace, [Therapy Today](#) may require the employee to work remotely or in isolation if suitable work is available. When allowing an employee to work remotely or in isolation, [Therapy Today](#) will continue to pay that employee the same regular pay and benefits the employee would have received had the employee not been absent.

[Therapy Today](#) will not subject its employees to any adverse action or deprivation of rights or benefits because of their removal from the workplace due to COVID-19.

Return to Work Criteria

[Therapy Today](#) will only allow employees who have been removed from the workplace to return to work in accordance with guidance from a licensed healthcare provider or in accordance with the CDC's "[Isolation Guidance](#)" and "[Return to Work Healthcare Guidance](#)." Pursuant to CDC guidance, symptomatic employees may return to work after all the following are true:

- At least 10 days have passed since symptoms first appeared, and
- At least 24 hours have passed with no fever without fever-reducing medication, and
- Other symptoms of COVID-19 are improving (loss of taste and smell may persist for weeks or months and need not delay the end of isolation).

If an employee has severe COVID-19 or an immune disease, [Therapy Today](#) will follow the guidance of a licensed healthcare provider regarding return to work.

Pursuant to CDC guidance, asymptomatic employees may return to work after at least 10 days have passed since a positive COVID-19 test. If an employer receives guidance from a healthcare provider that the employee may not return to work, they must follow that guidance.

Medical Removal Protection Benefits

[Therapy Today](#) will continue to pay employees who have been removed from the workplace under the medical removal provisions of OSHA's COVID-19 ETS. When an employee has been removed from the workplace and is not working remotely or in isolation, [Therapy Today](#) will [\[describe Employer policy for pay and benefits to employees removed from the workplace and not working remotely\]](#). Note the following requirements under OSHA's COVID-19 ETS:

- Employers must continue to provide the benefits to which the employee is normally entitled and pay the employee the same regular pay the employee would have received had the employee not been absent from work, up to \$1,400 per week per employee. For employers with fewer than 500 employees, the employer must pay the employee up to the \$1,400 per week cap but, beginning in the third week of an employee's removal, the amount is reduced to only two-thirds of the same regular pay the employee would have received had the employee not been absent from work, up to \$200 per day (\$1000 per week in most cases).
- The ETS also provides that the employer's payment obligation is reduced by the amount of compensation the employee receives from any other source, such as a publicly or employer-funded compensation program (e.g., paid sick leave, administrative leave), for earnings lost during the period of removal or any additional source of income the employee receives that is made possible by virtue of the employee's removal.]

Vaccination

Therapy Today encourages employees to receive the COVID-19 vaccination as a part of a multi-layered infection control approach. **Therapy Today** will support COVID-19 vaccination for each employee by providing reasonable time and paid leave to each employee for vaccination and any side effects experienced following vaccination.

Training

Therapy Today will implement policies and procedures for employee training, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach. **Therapy Today** and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to assess COVID-19 hazards and implement an employee training program at each facility. [[OSHA's COVID-19 Healthcare Worksite Checklist & Employee Job Hazard Analysis](#) may be useful to employers.]

Therapy Today's COVID-19 training program will be accessible in the following ways:

[Describe how training will be conducted (e.g., online education, department meetings and tool talks, discussion with supervisors, other specific methods).]

Therapy Today will ensure that each employee receives training, in a language and at a literacy level the employee understands, on the following topics:

- COVID-19, including:
 - How COVID-19 is transmitted (including pre-symptomatic and asymptomatic transmission);
 - The importance of hand hygiene to reduce the risk of spreading COVID-19 infections;
 - Ways to reduce the risk of spreading COVID-19 through proper covering of the nose and mouth;
 - The signs and symptoms of COVID-19;
 - Risk factors for severe illness; and
 - When to seek medical attention;
- **Therapy Today's** policies and procedures on patient screening and management;
- Tasks and situations in the workplace that could result in COVID-19 infection;
- Workplace-specific policies and procedures to prevent the spread of COVID-19 that are applicable to the employee's duties (e.g., policies on Standard and Transmission-Based Precautions, physical distancing, physical barriers, ventilation, aerosol-generating procedures);
- Employer-specific multi-employer workplace agreements related to infection control policies and procedures, the use of common areas, and the use of shared equipment that affect employees at the workplace;
- **Therapy Today's** policies and procedures for PPE worn to comply with OSHA's COVID-19 ETS, including:
 - When PPE is required for protection against COVID-19;
 - Limitations of PPE for protection against COVID-19;
 - How to properly put on, wear, and take off PPE;
 - How to properly care for, store, clean, maintain, and dispose of PPE; and
 - Any modifications to donning, doffing, cleaning, storage, maintenance, and disposal procedures needed to address COVID-19 when PPE is worn to address workplace hazards other than COVID-19;
- Workplace-specific policies and procedures for cleaning and disinfection;
- **Therapy Today's** policies and procedures on health screening and medical management;
- Available sick leave policies, any COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws, and other supportive policies and practices (e.g., telework, flexible hours);
- The identity of **Therapy Today's** Safety Coordinator(s) specified in this COVID-19 plan;
- OSHA's COVID-19 ETS; and
- How the employee can obtain copies of OSHA's COVID-19 ETS and any employer-specific policies and procedures developed under OSHA's COVID-19 ETS, including this written COVID-19 plan.

Therapy Today will ensure that the training is overseen or conducted by a person knowledgeable in the covered subject matter as it relates to the employee's job duties, and that the training provides an opportunity for interactive questions and answers with a person knowledgeable in the covered subject matter as it relates to the employee's job duties.

Therapy Today will provide additional training whenever changes occur that affect the employee's risk of contracting COVID-19 at work (e.g., new job tasks), policies or procedures are changed, or there is an indication that the employee has not retained the necessary understanding or skill.

Anti-Retaliation

Therapy Today will inform each employee that employees have a right to the protections required by OSHA's COVID-19 ETS, and that employers are prohibited from discharging or in any manner discriminating against any employee for exercising their right to protections required by OSHA's COVID-19 ETS, or for engaging in actions that are required by OSHA's COVID-19 ETS.

Therapy Today will not discharge or in any manner discriminate against any employee for exercising their right to the protections required by OSHA's COVID-19 ETS, or for engaging in actions that are required by OSHA's COVID-19 ETS.

Requirements implemented at no cost to employees

Therapy Today will comply with the provisions of OSHA's COVID-19 ETS at no cost to its employees, with the exception of any employee self-monitoring conducted under the Health Screening and Medical Management section of this Plan.

Recordkeeping

Therapy Today will retain all versions of this COVID-19 plan implemented to comply with OSHA's COVID-19 ETS while the ETS remains in effect.

Therapy Today will establish and maintain a COVID-19 log to record each instance in which an employee is COVID-19 positive, regardless of whether the instance is connected to exposure to COVID-19 at work. The COVID-19 log will contain, for each instance, the employee's name, one form of contact information, occupation, location where the employee worked, the date of the employee's last day at the workplace, the date of the positive test for, or diagnosis of, COVID-19, and the date the employee first had one or more COVID-19 symptoms, if any were experienced.

Therapy Today will record the information on the COVID-19 log within 24 hours of learning that the employee is COVID-19 positive. **Therapy Today** will maintain the COVID-19 log as a confidential medical record and will not disclose it except as required by OSHA's COVID-19 ETS or other federal law. [\[For more information, see OSHA's example COVID-19 log.\]](#)

Therapy Today will maintain and preserve the COVID-19 log while OSHA's COVID-19 ETS remains in effect.

By the end of the next business day after a request, **Therapy Today** will provide, for examination and copying:

- All versions of the written COVID-19 plan to all of the following: any employees, their personal representatives, and their authorized representatives.
- The individual COVID-19 log entry for a particular employee to that employee and to anyone having written authorized consent of that employee;
- A version of the COVID-19 log that removes the names of employees, contact information, and occupation, and

only includes, for each employee in the COVID-19 log, the location where the employee worked, the last day that the employee was at the workplace before removal, the date of that employee’s positive test for, or diagnosis of, COVID-19, and the date the employee first had one or more COVID-19 symptoms, if any were experienced, to all of the following: any employees, their potential representatives, and their authorized representatives.

Reporting

Therapy Today will report to OSHA:

- Each work-related COVID-19 fatality within 8 hours of [Employer name] learning about the fatality;
- Each work-related COVID-19 in-patient hospitalization within 24 hours of [Employer name] learning about the in-patient hospitalization.

4. Monitoring Effectiveness

Therapy Today and the COVID-19 Safety Coordinator(s) will work collaboratively with non-managerial employees and their representatives to monitor the effectiveness of this COVID-19 plan so as to ensure ongoing progress and efficacy.

Therapy Today will update this COVID-19 plan as needed to address changes in workplace-specific COVID-19 hazards and exposures.

5. Signature and Plan Availability

Therapy Today has prepared and issued this COVID-19 plan on 8/3/2021.

Employer Name:	Therapy Today
Address:	4572 S. Hagadorn Suite 1C
Business Owner:	Leslie Auld

This COVID-19 plan is available:

<input type="checkbox"/> Via hard copy at 4572 S. Hagadorn, Suite 1C, East Lansing, MI 48823	<input type="checkbox"/> Posted to	<input type="checkbox"/> Available by request. <input type="checkbox"/> Leslie.Auld@therapytodaycc.com
--	------------------------------------	---

This model plan is intended to provide information about OSHA’s COVID-19 Emergency Temporary Standard. The Occupational Safety and Health Act requires employers to comply with safety and health standards promulgated by OSHA or by a state with an OSHA-approved state plan. However, this model plan is not itself a standard or regulation, and it creates no new legal obligations.