Makom Business Resumption Plan

This COVID-19 Business Resumption Plan (BRP) outlines conditions for Makom’s resumption of full program and business operations, and the organization’s restoration of its complete menu of supports. The BRP is developed based on current guidelines and information from the following sources: The Centers for Disease Control and Prevention (CDC), the Centers for Medicare and Medicaid Services (CMS), the Maryland Department of Health/Developmental Disabilities Administration (DDA), the Virginia Department of Behavioral Health and Developmental Services (DBHDS), and Montgomery County, Maryland, as well as a range of sources of legal, medical and industry best and emerging practice resources.

NOTE: Makom may, at any time without notice and in its sole discretion, further restrict and/or reverse any easing of restrictions across all or at any of its sites in response to events and/or circumstances within or outside of agency operations. Nothing herein is considered necessarily sequential, nor does this BRP Plan, in whole or part, obligate Makom to any cause or course of action. Decisions will be made, in any such circumstance, based on available agency and/or community data, input or direction from authorities whose jurisdiction reasonably includes Makom and/or the services and supports it provides, and on the best judgement of Makom Leadership.

Conditions for Restoration of Business Operations

- People supported by Makom and all of its employees shall be verifiably vaccinated and boosted, at least once, against COVID-19, per CDC guidelines.
- Personal protective equipment (PPE) supplies, including at-home testing kits, will be stocked in suitable amounts at each site at which Makom conducts its business and program operations.
- Makom reserves the right to implement a COVID-19 testing protocol for its employees and people to whom it delivers support.
- Community vaccination, testing positivity, and community transmission rates will be used to determine continued easing of restrictions, which shall occur at the sole discretion of Makom.
- Alterations of any such pandemic-related staffing patterns will occur when Makom determines conditions warrant. Factors that will inform any alteration of pandemic operations will include but not be limited to:
  - Availability of fully vaccinated and boosted employees.
  - The number and support needs of people supported.
  - Access to day/employment supports by people Makom supports.
  - Health risks, including any people supported who are immunocompromised.
- Continued implementation and use of health screening questionnaires and attestations.
- Consent to and cooperation with symptom screening protocols.
- Group gatherings of individuals supported and employees may be determined based on CDC’s Community Levels and may, in its full discretion, limit group activities should transmission risks be rated or expected to be rated as medium to high (as rated here: https://www.cdc.gov/coronavirus/2019-ncov/science/community-levels.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fmore%2Faboutcovidcountychekc%2Findex.html).

Updated: May 2022
• All visitors, employees and/or people supported by Makom are required to be verifiably vaccinated and boosted (at least once, per CDC guidelines) before being granted entry to any Makom location. Makom reserves the right to deny access to any of its operating sites.

  • Consistent with current CDC masking guidelines:
    o Masking is required for employees and is strongly encouraged among people Makom supports in any indoor setting in which the vaccination status of others in the setting is unknown (e.g., grocery stores, movie theatres).
    o Acceptable masks include cloth, surgical/3-ply and/or N/KN95s.
    o Anyone choosing to mask do so in any/all work environments. Makom will continue to provide 3ply surgical and N/KN95; however, an employee may wear a cloth mask of their own choosing so long as it meets minimum CDC standards.
    o Masking is highly encouraged for anyone who is immunocompromised or at increased risk for severe disease from COVID-19, or if the person has someone in their household who is immunocompromised, at increased risk of severe disease or is not fully vaccinated.
    o Makom may modify masking requirements for employees and/or people supported without notice.

### All Makom Employees

• As a condition of employment and consistent with the Infectious Disease Policy and Procedures, all Makom employees must receive certain vaccinations, including but not limited to an annual influenza vaccination and COVID-19 vaccination and booster, or possess an approved exception. The Human Resources department shall coordinate with employees to meet and document compliance with this requirement.

• Employees shall provide, when requested, evidence of vaccination and booster, per CDC guidelines, which must indicate the COVID-19 vaccine and booster was, in fact, received.

• Pre-Shift Attestation
  o Employees may be required to attest to their health status and the presence/absence of any COVID-19 symptoms.
  o Employees are required to self-report any COVID-19 or flu-like symptoms, and in any such circumstance should NOT report to work. This requirement applies to employees without regard to vaccination status.
  o Employees and/or people receiving supports (in MOST, for example) who are sick should stay home and not report to work or the program site.

• Employees, irrespective of their vaccination status, may be sent home by their supervisor should there be any reason to believe the employee is ill or has been exposed to someone who has tested positive or was potentially exposed to COVID-19.
  o May not report back to work unless they have been third-party tested negative for COVID-19 (there may be circumstances in which two negative third-party test results is required for return to work, which shall be defined by Makom in its sole discretion and communicated to the employee) using an appropriate diagnostic testing protocol.
  o In limited circumstances, which shall be determined by Makom Leadership, an employee who is unable to work secondary to the application of agency policy, and/or these or related protocols may be paid all or part of their expected wages or may be required to use their
accrued PTO or may request Emergency PTO in accordance with Makom policy and procedures, or may be unpaid during their time away from work.

- Employees traveling outside the United States for any reason may be required to undergo testing and/or self-quarantine prior to returning to work at the sole discretion of Makom, which shall, in any event, be based on CDC Risk Assessment levels (available at https://www.cdc.gov/COVID-19/travel/recommendations-by-destination.html), current guidelines and/or best practices. In any such circumstance, the employees shall be cleared by the Human Resources Department prior to return to work. Employee may work if remote work is available.
  - Employees traveling within the United States may require a similar set of testing and/or self-quarantine restrictions that must be met prior to the employees’ return to work. Determinations will be based, in part, on CDC Community Levels for the employees’ travel destination(s) and stay(s).

### Continuity of Community Life Programs: In-Home Supports (CL/IHS)

- Any illness or symptoms of COVID-19 shall be reported to CL/IHS support employee immediately.
  - Employee may ask person supported if they:
    - Have been in the presence of unvaccinated/unboosted people.
    - Whether or not they are experiencing symptoms of COVID-19 infection.
    - If the Individual supported has a family member (or someone they have been in close contact with) who may have been exposed to COVID-19 or has tested positive for COVID-19.
  - If individual supported has any symptoms, IHS employee will advise the Individual supported and, if appropriate, her/his family as to next steps. In addition, the CL/IHS employee shall notify the appropriate Program Manager.

- CL/IHS supports shall be provided, to the greatest extent possible, to minimize the number of DSPs supporting individual people receiving supports. The regular and ongoing use of virtual supports (i.e., not in-person, but rather on a tele-platform) may be permissible and will be offered to all people receiving CL/IHS supports.

- CL/IHS supports provided in community gathering places (e.g., libraries, community centers) may be limited by Makom based on CDC Community Level and hospitalization rates.

### Continuity of Community Life Programs: Group Homes (CL/GH)

- Any illness or symptoms of COVID-19 shall be reported to CL/GH support employee immediately.
  - A Makom nurse and appropriate Program Manager are to be notified immediately. The nurse shall direct next medical/clinical steps.
  - Makom reserves the right to relocate the person receiving support to a different home or other Makom-owned or leased property should it be determined that doing so is in the best health interests of other people living in the GH.

- To reduce risk of exposure of people Makom supports in CL/GH and the staff who support them, Makom will follow CL/GH business practices as described below and which may change at any point in time:

Updated: May 2022
• Unvaccinated vendors or contractors should be scheduled at times when Individuals and staff can leave the home or maintain a safe distance from any workers unless urgent and approved by the Program Director.
• To the fullest extent possible, physical distancing is to be practiced.
• Supports provided in indoor and outdoor community gathering places (e.g., libraries, community centers, etc.) may be limited by Makom based on community transmission and hospitalization rates.

• **In Home Visits:**
  • Visit(s) are permitted by fully vaccinated and boosted (if eligible) people only.
  • Visitor(s) may be required to answer a health screening questionnaire and submit it to the Program Manager or Community Support Lead (CSL) prior to the visit.
  • Visitor(s) may be required to wear a suitable mask, wash/sanitize their hands, and/or practice physical distancing at Makom’s discretion. Refusal to comply with any such requirement will result in the visit being postponed or cancelled.
  • No more than three (3) visitors during any visit.

• **Periodic and Extended Out of Home Visits:**
  • Any exposure during any out of home visit to a person who is known positive for COVID-19; or, a positive COVID-19 test result and/or the display of any symptoms of COVID-19, shall be disclosed to Makom immediately.
    ▪ the Individual may be required to produce a negative COVID-19 test that is not more than 24 hours old;
      ✓ In limited circumstances, two negative test results within 48 hours or some other timeframe that shall be determined by Makom may be required for return to their home.
    ▪ the Individual may be required to continuously wear a mask for a period of up to five (5) days while in the presence of other people with whom they live and staff; and/or,
    ▪ the Individual may be required to quarantine to be established by Makom, in its sole discretion, for a period of not less than five (5) days. These requirements may be applied by Makom in any order and without notice.
  • In all cases, if at any point in time, Individual develops any symptoms of COVID-19 or at the discretion of Makom due to concerns of potential infection (even if tested prior to returning home), Makom may require:
    ▪ Individual will quarantine in their room
    ▪ Medical attention will be sought, and COVID-19 testing will be obtained
    ▪ Individual may be relocated to another location for isolation per physician’s recommendations, while awaiting test result(s), or at the discretion of Makom.

### Continuity of Community Life Programs: MOST

• In-person attendance at MOST is limited to only people who are fully vaccinated and boosted (if eligible). For anyone not fully vaccinated, there will be virtual supports available.

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• Individual must demonstrate ability and willingness to follow all safety guidelines and these protocols.
• MOST may be organized around certain times of the day, and/or activities as part of formal supports, and/or cohorts of participants, any/all of which shall be based on Makom and CDC and related guidelines and jurisdictional requirements which may from time to time apply to MOST.
• MOST in-person supports may be suspended at any time based on, but not limited to, jurisdictional requirements, a positive test result for COVID-19 among people supported in MOST and/or the staff, or the mandated closure of any site at which MOST supports are being delivered.
• If Individuals supported in MOST are sick or feeling unwell, they should stay home and not attend MOST.
  o If the Individual supported has a family member (or someone they have been in close contact with) who may have been exposed to COVID-19 or has tested positive for COVID-19, then the Individual shall disclose any such exposure, and the Individual will not be permitted to participate and may be required to quarantine for a period to be determined by Makom.
  o If any Individual is sick, has been exposed to a person that is positive to COVID-19, has symptoms related to COVID-19, has traveled outside the United States, or has traveled to a high Community Level region within the United States that may require self-quarantine, they will not be permitted to participate with in-person supports.
• If an Individual receiving supports in MOST should display symptoms of or report any exposure to a person who is known to have COVID-19; or, if the Individual tests positive for COVID-19, it is to be reported to MOST leadership immediately. In any such circumstance:
  o Emergency contacts will be notified to pick up Individual supported should there be any reason to believe the Individual has been exposed to COVID-19 or is or has become ill.
  o Will be recommended for testing in the event there is a known or potential exposure.
  o May not receive in-person supports from staff until Makom deems it safe but is eligible to participate in virtual supports as they may choose.

Confidentiality

• All information that includes personally identifying details pertaining to COVID-19 infection status, testing or any other related information among individuals supported by Makom and our DSPs is confidential and protected as private by the Health Insurance Portability and Accountability Act (HIPAA). No information is to be shared by any Makom employee, volunteer or anyone associated with the organization in any way and in any circumstance. This prohibition is absolute and covers any means of communication, including written, spoken, or signed, by e-mail, social media or on any other communication platform.
• Any/all communication about Makom and our experience of the COVID-19 pandemic is to be coordinated and authorized by the CEO and/or his designee (may include the Communications Manager, Chief Development Officer and/or Board President). No other external communication is authorized.