



Reopening Plan

Effective May 11, 2020

Table of Contents

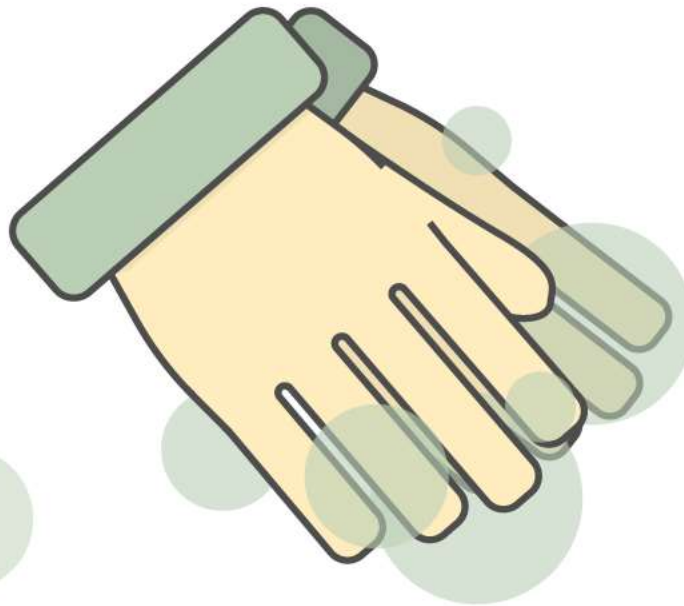
Introduction	3
Reopening Timeline	4
Day Service Closure.....	4
Phase One	4
Phase Two	4
Phase Three.....	5
Considerations	5
Protocols to Follow When Returning.....	6
Health Screening, Exposure and Confirmed Illness Protocol.....	6
Employee Screening Protocols.....	6
COVID-19 Exposure and Confirmed Illness Protocol	6
Reporting Transparency Protocol	7
Social Distancing Protocol.....	7
Health and Safety Protocols.....	8
General Individual Health and Hygiene	8
Mental Health Considerations	9
Cleaning and Disinfecting Protocol	9
Office Procedures.....	9
Conclusion.....	10

Introduction

At Hillcroft Services, it is our priority to keep our employees and their families healthy, especially in the midst of the COVID-19 pandemic. As such, we will abide by governmental guidelines when possible as we strive to balance public health concerns with the needs of those we serve. This Reopening Plan details how we intend to begin opening our business and still keep all of our clients and employees safe to every extent possible. This plan, which pulls from Centers for Disease Control and Prevention (CDC), Occupational Safety and Health Administration (OSHA), Bureau of Developmental Disability Services (BDDS), Indiana Association of Rehabilitation Facilities (INARF), Indiana State Department of Health (ISDH), and the Delaware County Health Department guidance, highlights the responsibilities of employees and those receiving services, and outlines the steps Hillcroft is taking to address COVID-19.

While we will implement various protocols to ensure your safety, it's up to you, your peers and co-workers to execute on these protocols daily. By releasing this Reopening Plan, Hillcroft hopes to clearly communicate our intentions for today and moving forward, highlight workplace and business protocols in place to protect your safety and establish a level of comfort for all of our clients and employees as we ask you to return to the facility.

We understand that everyone's situation is different and encourage those with specific risks or concerns to reach out to their interdisciplinary team, manager or HR to discuss alternate arrangements, should they be necessary.



Reopening Timeline

Due to the evolving nature of the COVID-19 pandemic, creating an exact timeline for resuming “normal” operations is not feasible. Hillcroft will continue to monitor applicable state and local guidance and determine next steps for reopening the facility should this timeline need altered.

At this time, we’ve created a tentative phased approach for asking our clients and employees to return to work and services. To remain consistent with state guidance, our phased approach to reopening our facility mirrors the guidelines included in Governor Holcomb’s Back on Track Indiana plan.

Day Service Closure

This is the current stage we are in according to Governor Holcomb’s Back-on-Track plan for Indiana, as state and local guidance prohibits gatherings of 25 or more people. Although Hillcroft is classified as an essential service, we feel that continuing day services in large groups only increases the risk of spreading the virus among staff and those we serve. At this time, day services will remain suspended and our offices will remain open to essential employees and maintenance vendors only. Employees who are able to work remotely are asked to continue doing so until notified otherwise.

Phase One (June 1 – June 12, 2020)

At this time, according to Governor Holcomb’s Back-on-Track plan for Indiana, gatherings of groups up to 100 will be allowed if practicing CDC social distancing guidelines. Under Phase One, the facility may begin to reopen however, it will still be recommended that all employees who are currently working remotely continue doing so unless otherwise instructed by their supervisor. Hillcroft will begin providing Day Services to identified residents in its own residential settings. These individuals will be determined based on desire and potential risk. Social distancing protocols will be in place and should be followed.

Phase Two (June 15 – July 2, 2020)

Under Phase Two, the facility may reopen to more employees and clients pending no new restrictions or executive orders by the Governor. Current government guidance states that in Phase Two, gatherings of up to 250 people are permitted. Similar to Phase One, it will still be recommended that all employees who are currently working remotely continue doing so unless otherwise instructed by their supervisor.

Should we reopen our facility in this capacity, social distancing protocols will be in place and facility equipment modifications may be made to ensure social distancing can be maintained throughout the day. The following protocols will be in place to ensure our headcount does not exceed 250 individuals and to promote social distancing efforts:

- **Staggered schedules**— Hillcroft Services will implement rotating schedules if necessary to accommodate individuals and staff that will be used until all restrictions are lifted to minimize personal contact.
- **Space modifications**— Hillcroft Services will modify the program space layout to create at least 6 feet of distance between individuals to reduce face-to-face interaction. Employee workstations are already spaced appropriately.
- **Discouraged in-person meetings**—until all social distancing requirements are lifted, Hillcroft discourages in-person meetings. We realize that in some cases this will not be possible but social

distancing guidelines must be utilized. Instead, we recommend conducting virtual meetings. Employees who are in the office should avoid gathering in groups.

In addition to the protocols mentioned above, Hillcroft Services may implement additional guidance during Phase Two that is designed to promote workplace safety.

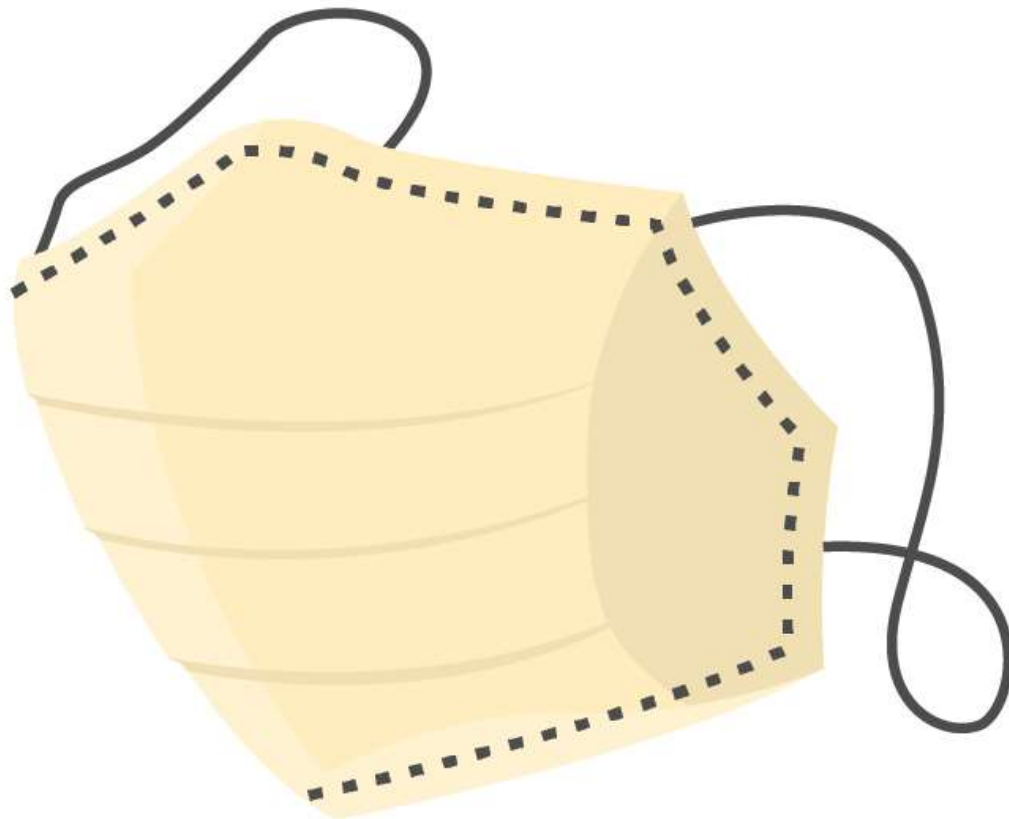
Phase Three (July 6, 2020)

Barring any restrictions by the Governor or local officials, under Phase Three, the facility will reopen to all employees and clients.

Considerations

It's important to note that these phases are tentative and are subject to change based on state and local guidance, and the pandemic itself. Should an employee or client test positive for COVID-19 after the facility reopens, our plan may change in an effort to protect everyone. In addition, if cases of COVID-19 spike again in our state or in our local area, we will consider whether to remain open or close.

We recognize that each individual will need to make a personal decision as to when he or she is comfortable returning to the facility based on individual circumstances. Please reach out to interdisciplinary team, supervisor, manager or HR to discuss your personal situation.



Protocols to Follow When Returning

Hillcroft has implemented various protocols designed to preserve the health and safety of our clients and employees as they return to the facility. This section further explains these protocols. For additional information after being trained, please reach out to your interdisciplinary team, manager or supervisor.

Health Screening, Exposure and Confirmed Illness Protocols

Keeping individuals safe is our priority. To accomplish this task, we have created various procedures for screening those who return to work or services, dealing with exposure to COVID-19, responding to a confirmed case of COVID-19 and reporting transparency.

Health Screening Protocols

The Equal Employment Opportunity Commission permits employers to measure employees' body temperatures before allowing them to enter the worksite. Any employee screening will be implemented on a nondiscriminatory basis, and all information gleaned should be treated as confidential medical information—specifically, the identity of workers exhibiting a fever or other COVID-19 symptoms (cough, shortness of breath, sore throat, runny nose, body aches, chills or fatigue) should only be shared with members of company management with a true need to know.

Employees may be asked to confirm the status of their health as part of working in the office. The company reserves the right to implement a screening protocol for symptoms, such as temperature checks or signed certifications, at any point. Results will be tracked separately from any personnel records and will be kept confidential. This protocol will commonly be implemented upon initial opening of the office and as a response to a confirmed diagnosis. Employees unwilling to complete a screening will be required to leave the premises.

Those served will be required to participate in the same screening protocols as employees.

COVID-19 Exposure and Confirmed Illness Protocol

Employees and clients who test positive for COVID-19 or believe they have been infected will be instructed to follow the advice of a qualified medical professional and self-quarantine. When self-quarantining, individuals should:

- Stay away from other people in their home as much as possible, staying in a separate room and using a separate bathroom if available.
- Not allow visitors.
- Wear a face mask if they have to be around people.
- Avoid sharing household items, including drinking cups, eating utensils, towels and bedding.
- Clean high-touch surfaces daily.
- Continue monitoring their symptoms, calling their health care provider if their condition worsens.

Notably, those who are symptomatic or who have tested positive should not return to the facility until the conditions outlined in the table below are met:

Release of Quarantine Considerations

Individual was symptomatic but was not tested for COVID-19.	Individual was tested for COVID-19.
<p>The individual may return if:</p> <ul style="list-style-type: none"> • They have not had a fever for at least 72 hours and have not used fever-reducing medication during that time. • Coughs and other symptoms have improved. • Seven days have passed since they first experienced symptoms. 	<p>The individual may return if:</p> <ul style="list-style-type: none"> • They no longer have a fever. • Coughs and other symptoms have improved. • They have received two negative COVID-19 tests in a row.

When an individual tests positive for COVID-19, deep-cleaning procedures will be triggered. Furthermore, those who have been in close contact with an individual who has tested positive for COVID-19 will be instructed to self-quarantine.

Reporting Transparency Protocol

Any individual who experiences COVID-19 symptoms or has tested positive for COVID-19 must notify a member of their interdisciplinary team or the Chief Operations Officer (Jessica Hammett) as soon as practicable. The individual will be asked to assist the health department with contact tracing. This information will be tracked separately from personnel records, and names will not be released. Depending on the circumstances, Hillcroft will notify impacted individuals if there is a confirmed case of COVID-19 in the facility. Hillcroft may elect to close the facility for a period up to 72 hours following a confirmed case to allow for natural deactivation of the virus.

Social Distancing Protocol

Individuals should follow social distancing best practices while at Hillcroft's facilities, including but not limited to workstations, lunch rooms, lounges, common areas, meeting rooms and office spaces. Specifically, individuals are asked to:

- Stay 6 feet away from others.
- Avoid tasks that require face-to-face interaction with others when possible.
- Avoid contact with others whenever possible (e.g., handshakes).
- Avoid touching surfaces that may have been touched by others when possible.
- Distance themselves from anyone who appears to be sick.
- Avoid gathering when entering and exiting the facility. Individuals should only enter and exit designated areas.
- Follow any posted signage regarding COVID-19 social distancing practices.

- Disinfect their workspace often which includes your work surface, keyboard, mouse, phone, etc.
- Avoid touching their face.
- Avoid nonessential gatherings.
- Stagger lunches to limit the number of individuals in the break room or cafeteria. Capacity limits and spacing identifiers will be posted to allow for proper social distancing.
- Meeting rooms will also have capacity limits but should be avoided by utilizing technology over face-to-face interaction when possible.
- Avoid using common areas.

Hillcroft may extend our social distancing guidelines after the facility completely reopens. Please adhere to any additional guidance as it is provided.

Health and Safety Protocols

The success of our Hillcroft Services Reopening Plan relies on how well everyone follows social distancing and health and safety protocols. As such, the following protocols have been implemented to ensure your health and safety. Please bring any concerns regarding the following protocols to your interdisciplinary team prior to returning and your DSP or Program Manager after returning. All staff would access their manager or supervisor immediately.

General Individual Health and Hygiene

Practicing good hygiene is essential to prevent the spread of COVID-19. Do your part by practicing good hygiene at work and at home:

- Regularly wash your hands for at least 20 seconds throughout the day with warm water and soap, specifically before eating.
- Use of alcohol-based hand sanitizer is recommended when hand washing is not an option.
- Cover coughs and sneezes with a tissue or on the inside of your elbow.
- Avoid touching your eyes, nose and mouth.

To help individuals remain healthy, Hillcroft has hand sanitizer and disinfecting wipes available throughout the facility. We have limited amounts of these supplies and will continue to restock as we are able. It is suggested that individuals wash their hands more frequently than normal. Additionally, custodial and maintenance staff have been instructed to disinfect key areas such as common area tables, countertops, copiers, microwaves, vending machines, coffee makers, toilets, faucets, automatic door openers and door handles on a daily basis. Use of all water fountains, refrigerated water dispensers and ice dispensers will be prohibited until further notice. Signage will be placed for reinforcement and removed when the restriction is lifted.

Most importantly, staff and clients are **required to wear face coverings** when in agency facilities. Masks will be required at all times unless sitting at your work area. If someone approaches your work area with questions, you must put on your mask for their protection. Employees and clients will be provided with a cloth mask that can be laundered. You may provide your own face coverings in accordance with

CDC guidelines if desired. It is required that individuals wear face coverings when entering and exiting the building and when using common areas such as bathrooms, kitchens and the lobby. Hillcroft will maintain a small inventory of disposable masks and gloves as a backup to individual-provided PPE. Inventory quantities will be regularly tracked and documented but cannot be guaranteed.

Finally, those who are feeling sick are asked to stay home. Those who have symptoms of acute respiratory illness, should immediately seek medical attention and follow the guidance of a health care provider.

Mental Health Considerations

Hillcroft understands that the COVID-19 pandemic has increased stress levels of people across the country. We want to prioritize mental health during these uncertain times. As such, we have made every effort to ensure that the facilities are safe for people to return to work or services and are ready to discuss personal situations. Employees with concerns regarding their mental health should request additional resources from HR.

Cleaning and Disinfecting Protocol

Employees should do their part to help keep their work areas and surrounding office areas as clean as possible by cleaning and disinfecting their workstations and surfaces they commonly use. Employees should also avoid using others' workstations, tools and equipment. Additionally, whenever an employee uses a common piece of equipment (e.g., printer or fax machine), it should be wiped down prior to and following use. Proper cleaning and disinfecting supplies will be provided by Hillcroft. Employees should wash their hands with warm water and soap for at least 20 seconds after cleaning or sanitizing a surface.

Hillcroft has requested that custodial staff facilitate cleaning of common areas and other frequently touched surfaces throughout the day. The frequency of this cleaning may change depending on the situation.

Office Procedures

In addition to the guidance outlined above, Hillcroft has implemented the following workplace procedures to be followed until social distancing guidelines are lifted:

- **Deliveries**—Deliveries, including mail and packages will be received at the entry 1 receptionist desk for processing and delivery to appropriate staff. Employees ordering food delivery service will need to instruct drivers to utilize the receptionist desk for contactless delivery.
- **Visitors**—until further notice, all visitors are prohibited. For business-critical visits (e.g., material deliveries), Hillcroft will take steps to safeguard employees and visitors by:
 - Requiring visitors to go directly to their assigned work area without unnecessarily interacting with employees.
 - Requiring visitors to wear a mask, practice social distancing and good hygiene while on-site.
- **Vending services**—it is recommended bringing your own beverage, preferably in a temperature-controlled container. It is recommended that all dishware be taken home nightly for cleaning in a dishwasher. The company will avoid catering events that allow for cross-contamination.

Hillcroft Services may add to this list of procedures as individuals return to the facility. Employees should monitor communications to ensure they're up to date on all health and safety protocols.

Conclusion

Hillcroft looks forward to the future of our people returning to our facility. The COVID-19 pandemic has created uncertain times and resulted in unprecedented changes. As communicated throughout this Hillcroft Services Reopening Plan, we are prioritizing the health of our clients and staff every step of the way as we consider reopening our doors for day services.

We will execute on our plan cautiously, following applicable state and local guidance as much as possible. We also understand that each individual's needs and situations will be different as our doors begin to reopen. Employees should discuss any concerns they have about returning to work as it relates to their personal health or situation with their interdisciplinary team, manager or supervisor.

Finally, we ask that everyone is patient and understanding of the fact that the COVID-19 pandemic may require our return plans to change. You will be given as much notice as possible in the event of an unforeseen setback or closure.

Employees should direct questions regarding the content of this action plan to their supervisor. Furthermore, while the strategies highlighted in this document can protect workers from COVID-19, it's important to follow CDC guidance at all times.