

Golden Rule ABA, LLC's COVID-19 Plan

1. Purpose and Scope

Golden Rule ABA, LLC is committed to providing a safe and healthy workplace for all our employees. Golden Rule ABA, LLC 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

Golden Rule ABA, LLC'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 Golden Rule ABA LLC's full support in implementing and monitoring this COVID-19 plan, and has authority to ensure compliance with all aspects of this plan.

Golden Rule ABA, LLC and the COVID-19 Safety Coordinator, Michelle Graham, 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.

3. Worker Protections

Patient Screening and Management

Clients are instructed to self-monitor and report any COVID-19 symptoms or a fever to Golden Rule ABA, LLC as soon as possible and cancel session until such time as a negative test can be provided or 10 days have passed without additional symptoms.

Personal Protective Equipment (PPE)

Golden Rule ABA, LLC will provide, and ensure that employees wear, facemasks or a higher level of respiratory protection. Facemasks must be worn by employees over the nose and mouth when indoors and when occupying a vehicle with another person for work purposes. Policies and procedures for facemasks will be implemented, along with the other provisions required by OSHA's COVID-19 ETS, as part of a multi-layered infection control approach.

Facemasks provided by Golden Rule ABA, LLC will be FDA-cleared, authorized by an FDA Emergency Use Authorization, or otherwise offered or distributed as described in an FDA enforcement policy. Golden Rule ABA, LLC will provide employees with a sufficient number of facemasks, which must be changed at least once a day, whenever they are soiled or damaged, and more frequently as necessary (e.g., patient care reasons).

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. The following are additional exceptions to Golden Rule ABA, LLC's requirements for facemasks:

1. When an employee is alone in a room.
2. While an employee is eating and drinking at the workplace, provided each employee is at least 6 feet away from

- any other person, or separated from other people by a physical barrier.
3. When employees are wearing respirators in accordance with 29 CFR 1910.134 or paragraph (f) of OSHA's COVID-19 ETS.
 4. When it is important to see a person's mouth (e.g., communicating with an individual who is deaf or hard of hearing) and the conditions do not permit a facemask that is constructed of clear plastic (or includes a clear plastic window). When this is the case, Golden Rule ABA, LLC will ensure that each employee wears an alternative, such as a face shield, if the conditions permit.
 5. When employees cannot wear facemasks due to a medical necessity, medical condition, or disability as defined in the Americans with Disabilities Act (42 USC 12101 et seq.), or due to religious belief. Exceptions will be provided for a narrow subset of persons with a disability who cannot wear a facemask or cannot safely wear a facemask, because of the disability, as defined with the Americans with Disability Act (42 USC 12101 et seq.), including a person who cannot independently remove the facemask. The remaining portion of the subset who cannot wear a facemask may be exempted on a case-by-case basis as required by the Americans with Disability Act and other applicable laws. When an exception applies, Golden Rule ABA, LLC will ensure that any such employee wears a face shield, if their condition or disability permits it. Golden Rule ABA, LLC will provide accommodations for religious beliefs consistent with Title VII of the Civil Rights Act.
 6. When Golden Rule ABA, LLC has demonstrated that the use of a facemask presents a hazard to an employee of serious injury or death (e.g., arc flash, heat stress, interfering with the safe operation of equipment). [Identify job tasks, if any, in which the use of a facemask presents a hazard of serious injury or death.] When this is the case, Golden Rule ABA, LLC will ensure that each employee wears an alternative, such as a face shield, if the conditions permit. Any employee not wearing a facemask must remain at least 6 feet away from all other people unless the employer can demonstrate it is not feasible. The employee must resume wearing a facemask when not engaged in the activity where the facemask presents a hazard.

If a face shield is required to comply with OSHA's COVID-19 ETS or Golden Rule ABA, LLC otherwise requires use of a face shield, Golden Rule ABA, LLC will ensure that face shields are cleaned at least daily and are not damaged.

Golden Rule ABA, LLC 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.

In addition to providing, and ensuring employees wear, facemasks, Golden Rule ABA, LLC will provide protective gloves, masks, and if needed, face shields) to each employee in accordance with Standard and Transmission-Based Precautions in healthcare settings in accordance with CDC's "[Guidelines for Isolation Precautions](#)," and ensure that the protective clothing and equipment is used in accordance with OSHA's PPE standards (29 CFR 1910 subpart I).

Health Screening and Medical Management

Health Screening

Golden Rule ABA, LLC will ask each employee to self-monitor for fever and other illness symptoms before each work day and each shift. If symptoms exist employee will notify employer as soon as possible. Employee may be required to have a COVID-19 test.

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

Golden Rule ABA, LLC 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 Golden Rule ABA, LLC 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, Golden Rule ABA, LLC 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.

Medical Removal from the Workplace

Golden Rule ABA, LLC has also implemented a policy for removing employees from the workplace in certain circumstances. Golden Rule ABA, LLC 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.

For employees removed because they are COVID-19 positive, Golden Rule ABA, LLC 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, Golden Rule ABA, LLC will keep them removed for work until the physician says they can return to work or 10 days have elapsed and the employee is free of symptoms.

If Golden Rule ABA, LLC 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, Golden Rule ABA, LLC 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.

Golden Rule ABA, LLC will keep the employee removed from the workplace for 10 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.

Any time an employee must be removed from the workplace, Golden Rule ABA, LLC 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, Golden Rule ABA, LLC will continue to pay that employee the same regular pay and benefits the employee would have received had the employee not been absent.

Golden Rule ABA, LLC 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

Golden Rule ABA, LLC 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, Golden Rule ABA, LLC will follow the guidance of the employee's 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.

Vaccination

Golden Rule ABA, LLC 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. Golden Rule ABA, LLC will also give each exemption request due consideration.

Training

Golden Rule ABA, LLC 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.

Golden Rule ABA, LLC's COVID-19 training program will be accessible in the following ways:
Describe how training will be conducted *in-situ* by supervisors.

Golden Rule ABA, LLC 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;
- Golden Rule ABA, LLC'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;
- Golden Rule ABA, LLC'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;
- Golden Rule ABA, LLC'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 Golden Rule ABA'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.

Golden Rule ABA, LLC 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.

Golden Rule ABA, LLC 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

Golden Rule ABA, LLC 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.

Golden Rule ABA, LLC 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

Golden Rule ABA, LLC 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.

4. Monitoring Effectiveness

Golden Rule ABA, LLC 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.

Golden Rule ABA, LLC will update this COVID-19 plan as needed to address changes in workplace-specific COVID-19 hazards and exposures.

5. **Coordination with Other Employers**

Golden Rule ABA, LLC will communicate this COVID-19 plan with all other employers that share the same worksite, and will coordinate with each employer to ensure that all workers are protected.

Golden Rule ABA, LLC will adjust this COVID-19 plan to address any particular hazards presented by employees of other employers at the worksite.

If a COVID-19 exposure is detected at worksite and it is known that another company's employees are present when the exposure was validated to have occurred, the other employer will be notified.

[Employer name] has identified below all other employers to coordinate with to ensure employees are protected.

| Other Worksite Employers | |
|---|-----------------------------|
| Employer Name / Employer Representative: | Contact Information: |
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6. **Entering Residences**

Golden Rule ABA, LLC will identify potential hazards and implement measures to protect employees who, in the course of their employment, enter into private residences and other physical locations controlled by a person not covered by the Occupational Safety & Health Act of 1970 (OSH Act). Golden Rule ABA, LLC requires that the company's COVID-19 protocols be communicated to homeowners and sole proprietors prior to conducting work activities at private residences or other physical locations not covered by the OSH Act.

All employees, regardless of vaccine status, are required to:

- Wash their hands or use hand sanitizer upon entering a client's home.
- Are required to wear surgical/comfort masks to protect clients when in indoor settings.
- Are required to wash their hands and change their face masks between clients.

7. **Signature and Plan Availability**

Golden Rule ABA, LLC has prepared and issued this COVID-19 plan on Oct. 31, 2021

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| Employer Name: | Golden Rule ABA, LLC |
| Address: | 99-1410 Halawa Heights Rd., Aiea, HI 96701 806 N West St., Chewelah, WA 99109 |
| Business Owner: | Christina Kaneakua and Michelle Graham |

This COVID-19 plan is available:

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| <input type="checkbox"/> On our website: www.goldenruleaba.com | <input type="checkbox"/> Posted to website 12/13/2021 | <input type="checkbox"/> Available by request. Contact Michelle Graham |
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