

Human Resources	COVID-19 Mandatory Stakeholder Testing		
	Policy Number	9.07a	Effective Date

Policy Statement:

The Company is required to follow, and otherwise intends to follow, all CDC, CMS, and other federal and state regulations and recommendations requiring state approved and/or Food and Drug Administration (FDA) validated COVID-19 testing, and routine re-testing, of all facility Stakeholders.

Procedure:

1. The Company’s top priority is to provide facility Stakeholders and residents with a safe and healthy work and care environment. Regular COVID-19 testing is highly recommended and required to meet this goal, as a matter of public health and safety.
2. The Company also must remain in compliance with all Federal and State regulations, at all times.
3. COVID-19 testing (and routine re-testing) in all long-term care facilities is now mandatory in many states, and highly recommended by the CDC, CMS, and the White House.
4. For these reasons, COVID-19 testing is now a condition of each facility Stakeholder’s employment (and continued employment) at the Company, regardless of job title or classification. This Policy is intended for COVID-19 *viral* testing only; it does not apply to COVID-19 *antibody* testing.

Process:

1. All facilities will conduct point prevalence or base-line COVID-19 testing for all residents and facility Stakeholders.
2. Except as otherwise stated below, all Stakeholder testing will be conducted by the Company and/or as directed by the CDC, CMS, or Department of Health in accordance with all applicable regulations, recommendations, and Company policies.
3. Agency and other contracted staff will be tested by their employer, and that employer will maintain test results.
 - a. Agency and contract staff must provide the facility a copy of individual reliable test results (e.g., from a certified lab) upon request, and during the facility screening process, before any temporary staff will be given facility access or perform work.

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- b. Only those temporary staff with a reliable and appropriate negative test result (either no evidence of active infection and/or evidence of a previous infection or immunity) will be permitted facility access.
 - c. Temporary staff underlying tests and results must be from a reliable source (e.g., a certified lab) and no later than 14 days old, or the timeframe otherwise required by applicable state and/or federal regulations.
- 4. Stakeholders must sign the Company approved Consent Form before any testing.
- 5. All new Company hires must sign the Consent Form during completion of new-hire paperwork, and then be tested during the pre-start credentialing process.
- 6. All PRN Stakeholders, or Stakeholders on a “leave” from work for at least five consecutive days or more, whether for vacation or another form of leave, must be tested for COVID-19 and have a reliable and appropriate negative test result (either no evidence of active infection and/or evidence of a previous infection or immunity) before or upon returning to work, or as otherwise required within the timeframes established by the state. If, while on leave, a Stakeholder travels out of the state or country, regardless of reason, Stakeholder must inform Company of same and circumstances depending, may be required to quarantine for up to fourteen (14) days, in addition to an appropriate negative test result.
- 7. A Stakeholder may refuse to be tested. ***A refusal that does not otherwise qualify below will be deemed a voluntary resignation, effective immediately.***
 - a. Stakeholders with a request for a medical or religious accommodation will be considered on a case by case basis.
 - b. The Company will accept verified documentation of a Stakeholder’s recent COVID-19 test result from a certified lab only, if such testing and results are no older than 14 days from the date of facility wide testing or timeframe as otherwise required by applicable state and/or federal regulations.