



NEW ENGLAND  
TREATMENT ACCESS, LLC.

# Incident Report

Date: 05/06/20

## Please Check All That Apply:

- Internal Incident
- CCC Reportable
- Brookline Reportable

*(If Yes, the Brookline Chief of Police **must** be C/Ced)*



**Description of Incident** *(add additional documentation and sketches for all Serious and Severe incidents)*

On 4/17/20, the [REDACTED] called out sick to their Brookline management team, indicating symptoms of cough and fever. While they emailed on 4/18/20 reporting some improvement of symptoms, they continued to stay home as instructed with any signs of illness. The associate first sought medical attention on 4/19/20 and was able to obtain a Coronavirus test on 4/22/20. They remained at home while awaiting results, which came back positive and was reported to NETA on Sunday, 4/26/20.

Brookline management proceeded to conduct contact tracing on [REDACTED] to determine the potential risks to other associates and the public. [REDACTED] was last in the dispensary on Thursday, 4/16/20, with their previous shift occurring on Sunday, 4/12/20. Shifts and station assignments were tracked for a period of seven days before the onset of symptoms. Once time periods and locations were narrowed down, camera footage was reviewed to evaluate compliance with PPE (masks, gloves), social distancing, and cleaning protocols to determine if there were any persons that would meet the CDC criteria of close contact. It was determined that there was no additional risk of exposure to other associates from this individual owing to NETA policy (see updated COVID Procedures & Response attached) and adherence to CDC guidelines.

Through the COVID-19 response plan, the Brookline management staff was notified via email of talking points to disseminate to staff verbally via routinely scheduled pre-shift check-in meetings.

While NETA continues to enhance its COVID-19 response, a review of the protocol determined that no immediate changes were required as a result of the positive case. NETA continues to engage a third party to clean and sanitize the retail facilities overnight daily. Mobile hand washing sinks are set up outside the facility for the use of patients. Face masks for front line associates are required, and NETA offers masks to patients that arrive without a face covering. Associates are required to use gloves when handling cash or personal patient items. Stanchions in front of the counters encourage patients to maintain their distance and Brookline features a glass barrier at the checkout counter separating Guides from patients for added safety. Staff are instructed to sanitize high-touch surfaces frequently. The associate took responsible action both by staying home when they fell ill, but also by reporting the situation to management and working with HR as instructed to keep the workforce safe.

**What could happen, if not corrected?**

**Potential loss (If not corrected, can similar circumstances as this incident turn into a serious or severe incident?)** During the COVID-19 pandemic, vigilance is necessary to limit the spread within the workplace.

**Corrective Action (How will NETA attempt to prevent the same incident from reoccurring?)**

Constant audit and review of the COVID-19 response plan are necessary to ensure the safety of associates and the public, however, all cases will not be preventable.

**Likelihood of Recurrence (If not corrected, what is the likelihood that another incident, same or even more severe, will happen?)**

During the pandemic, all cases will not be preventable. Through vigilance - NETA hopes to mitigate the risks.

Bottom of Form

**Prepared By:**

<b>Initially Prepared by:</b> [REDACTED]	<b>Date:</b> 5/6/2020
<b>Role:</b> [REDACTED]	<b>Signature</b> [REDACTED]

**Reviewed By:**

<b>Reviewed by:</b> [REDACTED]	<b>Date:</b> 5/6/2020
<b>Role:</b> [REDACTED]	<b>Signature</b> [REDACTED]



## COVID-19 Procedures and Response

Implemented 3/10/2020

updated 5/5/2020

Recent changes highlighted in yellow

### Corporate Overview

- The Parallel COVID-19 Task Force was formed 2/28/20 to begin monitoring the evolving Coronavirus situation and is comprised of leadership from Compliance (Corporate and Regional), Operations, Legal, Procurement, Human Resources, Medical Director and Communications.
  - The Task Force meets daily to track changes and set policy throughout the organization
    - Tracks, reviews and assesses guidance and communications from the CDC, NIH, OSHA, DPH, CCC and other regulatory bodies
    - Arranges live weekly virtual Q&A sessions for all employees with Parallel Medical Director and VP of Compliance beginning 3/25/20
    - Builds and distributes corporate communications
    - Builds and distributes scenario response plans for Cultivation/Production and Retail teams for COVID-19 exposure and positive case events

### All Facilities:

- Handwashing and hand sanitizing are critical to reducing the spread of disease, along with avoiding touching one's face. Follow the World Health Organization guidelines for handwashing and hand sanitization. With soap and water, hand washing should take between 20-40 seconds. Wash hands at the following times:
  - When beginning work
  - When coming back from break
  - Before eating / after eating
  - After smoking or vaping
  - After using the restroom
  - When changing tasks
  - After touching your hair, clothing, face or mouth
  - After sneezing or blowing your nose
  - Whenever they're dirty
- Alcohol-based hand sanitizer of at least 60% alcohol content is to be used as a tool between hand washing. According to the CDC, folks sometimes don't use enough and are prone to missing their *thumbs, fingertips, and between their fingers* - be thorough!
- Sanitize high-touch surfaces at least twice daily during operations, with an optimal interval of every four hours or more frequently as needed.
  - Sanitizing Procedure:
    - Utilize single-use sanitizing wipes instead of a cleaning solution and cloth wherever possible
    - When utilizing reusable cleaning cloths, change out with a clean cloth very frequently (between tasks, between rooms, when soiled, etc.)



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- When using single-use wipes, allow wipe solution to dry on its own according to label instructions - do not wipe dry
- High-touch surfaces are identified as:
  - Door Knobs/door handles
  - Faucet knobs and handles (break room/bathrooms/handwashing sinks)
  - Microwave buttons
  - Vending machine buttons
  - Water fountain/water bubbler buttons
  - Coffee machine buttons
  - Refrigerator door handles
  - Time Clocks
  - Break room tables
  - Common area tables
  - Shared locker room surfaces
  - Handrails
  - ADA lift rails
- On the sales floor
  - Sales counters
  - Stanchion stands
  - Consult areas
- Individual users (Management, Inventory, Security & Guides) should be mindful to sanitize their personal high-touch surfaces:
  - Keyboards
  - Phones
  - Desk surfaces
  - ID card readers
  - Debit pads
- Overnight third party cleaning and sanitization service of common areas in all three locations implemented by 3/25/20 in addition to routine daily Environmental Services cleaning
- Human Resources released a series of adjustments to sick time and leave policies in response to the crisis to allow flexibility for workers and to ensure sick employees would be able to stay home.
  - Associates feeling unwell or exhibiting any symptoms are instructed to stay home and communicate with their HR Business Partner for next steps
  - Associates at a higher risk due their medical circumstances in relation to the pandemic are advised to work with their healthcare professionals and HR Business partner to work on a plan to support the individual in their work environment
  - Penalties for attendance or missed work are suspended during this time
  - Staff is given an additional 40 hours of sick leave per incident in addition to the existing 40 hours in place for a total of 80 hours
    - Full-time associates unable to return to work after two weeks due to illness are eligible to apply for short-term disability benefits
  - Doctor notes are required following a 3 day absence due to illness



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- OSHA guidance recommends relaxing this requirement, however the company deems it necessary to protect the workforce from potential exposure
- Telemedicine appointments through Cigna are available to provide clearance, or through a virtual visit with our Medical Director for those that are uninsured or unable to reach their medical provider
- Associates are eligible to take a 30 day unpaid leave of absence for any reason after exhausting vacation time
- Associates covered by NETA insurance pay nothing out-of-pocket for positive coronavirus related testing and telemedicine services are available at a cost savings for covered associates
- An Employee Assistance Program is available for all Associates to assist in helping with issues related to mental health, financial stress, and a number of other issues employees may face
- As of 4/6/20, surgical masks are required for use by all front line associates during their shifts and for any other associate unable to maintain a consistent 6' ft social distance while they work. NETA encourages the use of masks for all associates at all times while at work. We are continually working to ensure the consistent availability of masks for the entirety of our workforce.
  - On 4/3/20, the CDC recommended the use of masks for all persons in public. In line with this guidance, messaging was pushed to all associates to encourage their use on 4/4/20.
  - On 5/5/20, Governor Charlie Baker issued an order for all persons in MA over the age of 2 years to wear a face covering in public.
  - NETA is monitoring the guidance regarding PPE.
- Associates have been asked to check their temperature at home prior to coming to work since 4/13/20
  - Onsite temperature screening of all associates entering NETA facilities prior to the start of their shift beginning 5/5/20

## Dispensaries

- Full-service operations ceased as of 3/14/20, moving to Reserve-Ahead service for both Medical and Adult-Use operations
- Paper menus were eliminated 3/14/20
- Adult Use operations were suspended in Brookline as of 3/16/20, and in Northampton as of 3/24/20 in response to the CCC Cease and Desist order issued 3/23/20
- Curbside delivery service began as an option to patients at the Northampton location on 4/18/20
- Home Delivery was approved by the Cannabis Control Commission and the Town of Brookline on 4/28/20 with operations beginning 5/1/20
- Social distancing is guided for patients by signage, taped markers at 6' intervals on the floor, and by stanchions
- While 6' of distance is not consistently operationally possible between Guide and patient, stanchions are placed in front of the counters to remind patients to keep their distance while interacting with Guides to provide the most amount of distance possible
- Glass partitions were installed in the primary Reserve Ahead check-out zone in Brookline on 4/17/20 to serve as a barrier between customers and associates, with installation planned for the remaining customer service counters in Brookline and Northampton in the coming weeks
- Associates are instructed to maintain 6' of distance between themselves during operations to the best of their abilities, with the recognition that this is not possible at all times.



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- Per the “Revised Guidance Regarding the Order by the Governor Prohibiting Assemblages of More Than 10 People and On-Premises Consumption of Food and Beverages” issued 3/23/20, essential service operations are not subject to the provisions of the order prohibiting the assembly of more than 10 people in a space at one time and at a distance of 6’. The guidance urges social distance at all times when possible, which is a goal NETA takes seriously at all locations
- Registers are staffed so that every other register is occupied - ensuring that 6’ of space is between each Guide
- Management is tasked with ensuring social distance is maintained between staff
- Associates are given ample time to step off register to wash and sanitize hands as frequently as necessary, as well as to clean and sanitize their station
  - Minimally, stations are sanitized when Guides arrive on register and leave the register
  - Typically, Guides sanitize debit pads and counters after each patient encounter
- Mobile hand washing stations have been set up outside each dispensary for the use of patients prior to entering the facility
- IDs and patient cards are not handled by staff. Security staff, while wearing gloves, ask the patient to hold up their government issued ID and patient card to visually inspect them for validity and then scan the government ID to verify age and validity.
  - At the counter, the Guide visually inspects the patient card and ID without handling to verify patient information
- Gloves are worn by staff when handling product for packaging orders and when handling cash.
  - When handling cash, staff is to don fresh gloves and complete the transaction. When the patient leaves, the Guide doffs gloves properly and sanitizes or washes their hands
  - Patients are encouraged to use debit cards when possible to limit cash handling
- Patients exhibiting signs or symptoms of COVID-19 are discouraged from visiting the dispensaries through messaging on our website.
- As of 4/17/20, face masks are offered to patients not already wearing a face covering in both the Northampton and Brookline dispensary locations
- Tissues, sanitizer and trash cans are made readily available to both patients and staff
- The HVAC systems have been retrofitted in both retail locations to accommodate MERV 13 air filters to capture fine particulates and bacteria. The air is fully exchanged in each facility 2 to 5 times an hour
- Air purifiers are in place in shared employee-only spaces
- Synexis Sentry bacteria reduction systems were installed in both Brookline and Northampton on 4/17/20 to further purify the air in the facility

## Transportation

- Each transportation van is outfitted with PPE
  - Disposable gloves, sanitizing wipes, and masks are provided for Transport driver use
- Transportation staff follows a stringent set of cleaning and sanitizing procedures both daily and between stops.
- Daily cleaning procedures include cleaning and disinfecting the cab and cargo areas with disinfectant, as well as the transport phones, transport form binders, keyrings, and Slick Locks.



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- Drivers disinfect door handles inside and out, steering wheel, shifter knob, radio, dashboard, and all touch surfaces inside the cab at least daily and typically between stops.
- Drivers utilize gloves when transporting cargo, and are instructed to wash and sanitize their hands when leaving each facility.

## Franklin Cultivation / Processing

- The number of staff allowed to be stationed in a confined zone at one time was limited to 25 as of 3/17/20
  - Minimum to operate and maximum allowable staff per confined zone as determined by spatial limitations and shared HVAC were identified
    - As an essential service operation, limits on the number of people that may assemble do not apply, but NETA feels it necessary to reduce the number of staff in a confined space to reduce the risk of possible transmission and better enable social distancing
  - NETA has seen an approximately 50% reduction in staff reporting to work on any given day since the beginning of the crisis, leading to a natural reduction in the volume of staff in each room without requiring schedule changes
  - Department leaders were instructed to coordinate break times, when possible, to limit the number of people congregating in common areas at one time
- Social distancing guidance was issued to management 3/16/20 for all areas of the facility and communicated to all facility staff 3/17/20
  - Staff was informed to take care to space appropriately when clocking in and out
  - To the degree possible, work stations are set up to be 6' apart from each other
    - In MIP Lab and Harvest/Trim, gloves and masks are part of routine PPE
  - Chairs were removed from the break room so that only 25 remained to further enforce social distancing and the temporary occupancy limit
  - Signage has been placed throughout the facility to remind staff of social distancing
  - Compliance/Environmental Health & Safety staff tour the facility a few times a week to check in with department leaders and staff to ensure social distancing
  - Security staff has added social distancing checks as part of their tours of the facility during their shifts
- Shifts will be staggered as of 4/5/20 in each department to mitigate the flow of staff coming into the building at one time and traffic in each locker room and common areas
- Air filtration in Franklin is robust due to the nature of cannabis cultivation and processing, with a minimum of MERV 13 filters throughout, with HEPA filtration in several areas.