

BRIGHTSPRING HEALTH SERVICES / PHARMERICA
COVID-19 EMPLOYEE PRIVACY FAQ

The ongoing COVID-19 situation presents unique challenges for our leaders in the field, including novel questions and concerns related to employee screening and privacy. This FAQ is intended to answer some of the most frequently asked questions about those issues. Please review this FAQ carefully. If you have specific questions that are not addressed here, please contact the Legal Department.

Thank you for your efforts to protect our consumers, patients, and employees during this evolving situation.

1. What is our policy/practice for screening employees for COVID-19?

Visitor screening or restriction is in place at all locations. To ensure the health and safety of our consumers, patients, and employees, the organization now requires that all employees take their own temperature and answer a few short illness screening questions prior to every shift. Employees can self-screen by completing and signing the Employee Screening Tool or by using the web- or app-based Screening Tool. Please refer to the screening documents and flowcharts available on REACH for further information.

2. What steps are we taking to protect the privacy of employees who are screened?

All Employee Screening Tools are kept confidential in accordance with applicable laws and regulations. Paper documents are maintained by each operation in a secure location (such as locked in the medication cabinet or with medical records). When an employee uses the web- or app-based Screening Tool, the information is immediately transmitted and electronically stored under the employee's EmployeeID number.

3. What should we do if an employee objects to or refuses screening on privacy grounds?

If an employee objects to or refuses screening on privacy grounds, please remind him or her of the steps the Company is taking to protect employee privacy and that the screening is critical to protect the health and safety of our consumers, patients, and other employees. If the employee continues to refuse screening, the employee should be sent home until he or she agrees to comply with any applicable screening requirements.

4. If we learn that an employee has tested positive for COVID-19, or that he/she has been in close proximity to someone who has tested positive, may we share that information with others?

Yes, leaders may share with fellow employees that an employee who works closely with them may have been exposed, and may share this information with other employees (including corporate leadership) as appropriate. However, the identity of the individual who has tested positive **should not** be shared with other employees or co-workers. Employees exposed to a co-worker with confirmed COVID-19 should refer to CDC guidance for how to conduct a risk assessment (<https://www.cdc.gov/coronavirus/2019-ncov/php/risk-assessment.html>).

5. Are there any privacy issues associated with sending a sick employee home? Are we somehow disclosing Personally Identifiable Information about a medical condition (since other employees may notice) if we single out someone to send home?

Merely sending an employee home does not trigger any privacy issues. However, other employees should be instructed to maintain the confidentiality of health information regarding any such employee.

6. Who should I contact if I have additional questions that are not addressed here?

Please contact the BrightSpring/PharMerica Legal Department directly:

- Allison Brown, Associate General Counsel
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