



COVID-19 Preparedness Plan

Revised 10/1/20

Purpose

Epic Enterprise is committed to providing a safe and healthy place for the individuals we serve, our employees and visitors. To ensure that, we have developed the following Preparedness Plan in response to the COVID-19 pandemic. Managers and employees are all responsible for implementation of this plan. Our goal is to mitigate the potential for transmission of COVID-19 in our licensed site which will require full cooperation from all employees. Only through this cooperative effort can we establish and maintain the safety and health within our workplace and communities.

This plan will be a living document, to be updated as often as relevant information regarding the pandemic is released. This plan will adhere to Minnesota Department of Health (MDH) and Centers for Disease Control and Prevention (CDC) guidelines on COVID-19. The COVID-19 Preparedness plan will be posted onsite, readily accessible to employees and persons served and a copy will be made available to each person receiving services, their legal representative, if any, residential providers, if any, and their case manager.

The DHS Commissioner has temporarily modified Minnesota Statutes, section 245D.04, subdivision 2 pertaining to a person's service-related rights by adding a new clause: A person's service-related rights include the right to make an informed choice about whether to receive services in the community or to "stay-at-home" and not receive day services in the licensed facility or in the community during the peacetime emergency to minimize their exposure to COVID-19. This right exists even if the person does not meet the definition of an "at-risk person" under Emergency Executive Order 20-55, paragraph 2. Accordingly, Epic has updated its Rights of Persons Served Policy and will document the communication of this update along with each person's choice to stay at home or receive day services during the peacetime emergency.(This plan serves as notification that Epic considers this right a temporary addition to our Service Recipient Rights policy.)

While Epic will be contacting persons served individually to discuss the option to return to in-person services, we understand that some may choose to not return at this point or may initiate a voluntary discharge at any point in the future. Epic is committed to designing an environment that mitigates risk to the highest degree in which we are able. Epic is also committed to honor the individual choices made by the people in our programs.

COVID-19 Protocols – Overview

Affected and **symptomatic** people are required to stay home. They are not permitted to access the Epic building, vehicle, provide or receive direct services.

An "**affected person**" is defined as a person with:

- A confirmed case of COVID-19 without symptoms
- A household member, intimate partner, or person within close contact with a confirmed case of COVID-19. Close contact is defined as being within 6 feet of a person for a prolonged period of time 15 minutes or more.

Affected people -guidance on returning to the Epic building, vehicle, provide or receive direct services

- A confirmed case of COVID-19 without symptoms will be contacted by a public health worker who will give more information. Unless directed otherwise, they may return after 10 days have passed since being tested without any symptoms developing during that time period
- After close contact to a person with a confirmed case, public health may recommend getting tested. You may return after a 14-day self-quarantine at home, while monitoring for COVID-19 symptoms.

A "**symptomatic person**" is defined as a person showing any signs and symptoms related to COVID-19.

- A new fever (100.4°F or higher) or feeling feverish (chills, sweating)
- A new cough that you cannot attribute to another health condition
- New shortness of breath that you cannot contribute to another health condition
- A new sore throat that you cannot attribute to another health condition
- New muscle pain that you cannot attribute to another health condition, or that may have been caused by a specific activity (such as physical exercise)
- New loss of smell or taste that you cannot attribute to another health condition
- Other less common symptoms include gastrointestinal symptoms like nausea, vomiting, or diarrhea

These symptoms may appear 2-14 days after you are exposed to the virus that causes COVID-19. Not everyone with COVID-19 has all of these symptoms, and some people may not have any symptoms. Talk to your health care provider if you have questions or concerns about symptoms.

Current MDH guidance recommends getting tested for COVID-19 when these symptoms are present. In addition, contact your healthcare provider. After getting tested, stay home and away from others, following the advice of your healthcare provider.

Symptomatic people are able to return to the Epic building, vehicle, provide or receive direct services when:

- Positive test result with symptoms – stay home until all three things are true:
 - You feel better. Your cough, shortness of breath, or other symptoms are better, and,
 - It has been 10 days since you first felt sick; and,
 - You have had no fever for the last 24 hours, without using medicine that lowers fever.
- Positive test without symptoms – stay home and away from others for at least 10 days from the testing date whether or not you have symptoms of COVID-19. You will be contacted by a public health worker who will give you more information.
- Negative test result but have symptoms – talk to your doctor or other health care provider.
 - If they say you have a different disease, follow their advice for how long to stay home.
 - If there is not another diagnosis, you should still stay home until your symptoms are better and you do not have a fever.
- If you have symptoms but do not get tested, you should stay home until all three things are true:
 - Your symptoms are better.
 - It has been 10 days since you first felt sick; and,
 - You have had no fever for the last 24 hours, without using medicine that lowers fever.

Screening for signs and symptoms of COVID-19 - employees:

Employees have been informed of and encouraged to self-monitor for signs and symptoms of COVID-19. At the start of their shift each day, staff will be required to complete a Daily Access Questionnaire, take and record their temperature.

- Daily Access Questionnaire will include questions related to above COVID-19 symptoms and ask if person is living with or had close contact with anyone with who has been diagnosed or has experienced symptoms of COVID-19.
- A station with a no-touch thermometer has been set up at Epic for employees to complete these steps.
- Employees who are working directly with service recipients but are not entering the building should complete the questionnaire at home, take their temperature and email/text it to their supervisor.
- Employees who answer “yes” to any of the screening questions or has a measured temperature above 100°F should notify their supervisor and leave the building.
- All employees are to inform their supervisor of a return from international travel. A return to work will be based on current CDC guidelines.

Epic encourages employees to stay at home when they are sick, when household members are sick or when required by a health care provider to isolate or quarantine themselves or a member of their household. Epic employees may be eligible for Paid Time Off and other benefits.

Screening for signs and symptoms of COVID-19 – persons served:

Persons served, guardians and residential providers have been informed of and encouraged to monitor for signs and symptoms of COVID-19. Each person entering an Epic vehicle or community site shall have had their temperature taken and completed the Daily Access Questionnaire prior to gaining access to the Epic vehicle or community site each day.

- Daily Access Questionnaire will include questions related to above COVID-19 symptoms and will ask if person is living with or had close contact with anyone with who has been diagnosed or has experienced symptoms of COVID-19.
- If picked up by an Epic staff, the staff should record the temperature on a written log or in Cashe as an indication that the questions were answered in the negative and the temperature was taken. The following are possible procedures:
 - Epic staff may use a no-touch thermometer to take the persons temperature and ask the person the questions
 - Or
 - Epic staff may ask the residential provider or family to take the persons temperature and tell the staff the temperature and answer the questions
- If staff meet the persons served at a community location, the Program Director will determine the appropriate procedures related to these safety measures.
- Persons served who answer “yes” to any of the screening questions or has a measured temperature above 100°F should stay home. Staff should notify a Program Coordinator/Program Director.

Staff and people receiving services must comply with any community business’ safety plan.

Individual Consideration for Resuming services

Persons served will be evaluated individually, and if determined to be safe, may be allowed to resume services with the approval of the Program Coordinator/Program Director.

Community work:

The Minnesota Department of Human Services has identified that people with disabilities have the right to make an informed choice about whether they want to return to work. Lead agencies and providers should have conversations with the person and their support team to discuss the individual risks and benefits of returning to work. People who are considered high risk, per EO 20-55(PDF), are strongly encouraged to stay home or work from home if feasible, but they have the right to make an informed choice about returning to work. The following criteria will be used to individually evaluate people who are employed at community sites (either employed directly by the business or employed by Epic and on a crew):

1. Business wants employee to return
2. Business has provided Epic with a COVID-19 Preparedness Plan or other relevant information provided to employees. Program Coordinator/Program Director has reviewed and approved safety protocols for people served by Epic.
3. Employee (employed by Epic or directly by business) wants to work
4. Guardian, if applicable, wants individual to return to work

5. Factors have been considered and/or discussed with the person and their support team to discuss the individual risks and benefits of returning to work. Factors discussed and/or considered include:
 - a. Is the person at a higher risk for infection because they are older than age 65 or have an underlying health condition?
 - b. Is it possible for the person to receive employment supports remotely?
 - c. Has the team reviewed the employer's COVID-19 preparedness plan? Does the person feel confident the employer will implement that plan effectively?
 - d. Can the person protect themselves and others by washing their hands often; avoiding touching their eyes, nose and mouth, cover their coughs and sneezes; and wearing a protect mask or cloth face covering?
 - e. Can the person access transportation safely?
 - f. Is this a good time for the person to consider different employment options?
 - g. Given all these factors, is the benefit of returning to work outweighed by the health risk associated with returning to work?
6. Case Manager has had opportunity to document a summary of the above questions and the person's resulting decision.
7. Case Manager is willing to make changes to rates, if necessary.
8. Client Employee is able and willing to be trained to follow new safety standards
 - a. Social distancing, PPE, temps, et
 - b. Epic and business protocols
9. Adequate supports are available through Epic or other source
 - a. Adequate staff supports – including qualified job coach
 - b. Transportation to and from job
10. Residence is willing and able to provide necessary related supports

Other community locations and services within the Epic building:

A person's service-related rights include the right to make an informed choice about whether to receive services in the community or to "stay-at-home" and not receive day services in the licensed facility or in the community. The following criteria will be used to individually evaluate providing services in other community locations or the Epic building:

1. Person served is interested in services.
2. Guardian, if applicable, wants individual to resume services
3. Factors have been considered and/or discussed with the person and their support team to discuss the individual risks and benefits of resuming services. Factors discussed and/or considered include:
 - a. Is the person at a higher risk for infection because they are older than age 65 or have an underlying health condition?
 - b. Is it possible for the person to receive services remotely?
 - c. Has the team reviewed Epic's COVID-19 preparedness plan? Does the person feel confident that Epic will implement that plan effectively?
 - d. Can the person protect themselves and others by washing their hands often; avoiding touching their eyes, nose and mouth, cover their coughs and sneezes; and wearing a protect mask or cloth face covering?
 - e. Can the person access transportation safely?

- f. Given all these factors, is the benefit of returning to day services outweighed by the health risk associated with returning to day services?
 - g. Is the current Individual Abuse Prevention Plan (IAPP), self-management plan and outcomes consistent with receiving services in the (building and) community?
4. Case Manager has had opportunity to document a summary of the above questions and the person's resulting decision.
 5. Case Manager is willing to make changes to rates, if necessary.
 6. Client is able and willing to be trained to follow new safety standards
 - a. Social distancing, PPE, temps, etc.
 - b. Epic protocols
 7. Adequate supports are available through Epic
 - a. Adequate staff supports
 - b. Transportation
 8. Residence is willing and able to provide necessary related supports

Notification of Exposure to COVID-19

Staff who exhibit symptoms of COVID-19 while at work will immediately report to their supervisor and leave as soon as possible. If providing direct supports to clients requiring supervision, a plan will be developed quickly to provide needed supports while allowing staff person to leave as soon as possible.

Epic staff will monitor persons served for signs of illness. If a person becomes ill during the day and requires supervision, supervision must be provided until a caretaker arrives to bring the person home. The staff should contact a Program Coordinator/Program Director. When in community locations and the staff is supporting other people, the staff and Epic Program Coordinator/Program Director will develop a plan for the person to remain isolated as much as possible and for transportation to be arranged to bring them home.

Employees or persons receiving services who test positive for COVID-19 or have come in close contact with someone testing positive for COVID-19 must notify a Program Coordinator/Program Director immediately. The Executive Leadership Team will be responsible to gain an understanding of potential locations and individuals the affected person had been in contact. Epic will share with employees and others, information regarding any possible exposure to persons with COVID-19, while still adhering to Data Privacy Guidelines. Epic will notify legal representatives, case managers, and residential providers when a person served has been potentially exposed. **The MN Department of Health (MDH) (1-800-657-3504) will be contacted for further guidance.**

Transportation Services

Epic will make all reasonable efforts to design transportation services to maximize distance between persons served.

- Drivers will wear masks while driving and assisting people on/off the vehicles. Masks may be temporarily removed while driving if visibility is impacted due to fogged eyeglasses.

- A face shield is recommended for staff to use for eye protection.
- Riders will wear face masks while using Epic transportation. Any deviation from this protocol needs prior approval from a Program Director.
- In order to address social distancing in a vehicle, no more than two passengers may ride in a car, no more than three passengers may ride in a mini-van, no more than six passengers may ride in a large van and no more than seven passengers may ride in a bus. Riders should be spaced out as much as possible.
- As much as possible, vehicles should be used for the same people from day to day.
- For ambulatory passengers (if needed), drivers may exit the vehicle, standing outside the door of the vehicle and from a socially distanced position be prepared to assist a person who may lose their balance entering or exiting the vehicle. Staff should encourage as much independence as possible with vehicle entry/exit including fastening seatbelts.
- Drivers who help passengers get in or out of a vehicle, fasten seat safety belts, secure wheelchairs in the vehicle, or handle passengers' belongings should use hand sanitizer after each interaction.
- When possible, the driver will improve ventilation by opening windows or setting the air ventilation/conditioning on non-recirculation mode.
- Vehicles will be sanitized by the driver after each route. Surfaces to be cleaned and disinfected include: door handles, arm rests, seats, seatbelt buckles, all types of control knobs and handles, windows as needed, etc.
- Job coaches will pick up people receiving services at their homes and go directly to and from their job site. There will be no transportation hub at the Epic building.
- Individuals who are transported by public transportation or taxi will abide by their protocol. Riders on public transportation are encouraged to:
 - Wear a cloth face covering
 - Refrain from touching your face with unwashed hands
 - Look for social distancing instructions on the vehicle and consider skipping a row of seats between other riders, if possible
 - Consider packing hand sanitizer with at least 60% alcohol, sanitizing wipes, facial tissue, and an extra cloth face covering to ensure adequate supplies are available during travel
 - Avoid touching frequently touched surfaces such as touchscreens, ticket machines, handrails, buttons, and benches as much as possible
 - Use hand sanitizer or wash hands with soap and water for at least 20 seconds if hands are visibly soiled, when arriving at destination

Protecting Yourself and Others

Following are recommendations on distancing and hygiene from the Minnesota Department of Health:

Social Distancing

- Stay home as much as possible
- Stay at least 6 feet from other people if you are in public places
- Telework if you can
- Avoid close contact with people who are sick

- If you are 65 or older or have certain underlying medical conditions, stay home and avoid situations where you could be exposed, including travel

Hands and face hygiene

- Wash your hands often, with soap and water. Wash for at least 20 seconds.
- Always wash your hands after being in a public place, prior to and after using the toilet or after blowing your nose, coughing or sneezing.
- When soap and water are not available, use hand sanitizer.
- In the Epic building, handwashing facilities are readily available. Hand sanitizer is stocked by the entrance. Handwashing and "cover your cough" signs are posted.
- Cover your mouth and nose when you cough or sneeze. Cough or sneeze into your elbow or a tissue. Throw used tissues in the trash.
- Avoid touching your eyes, nose, and mouth with unwashed hands.
- Staff will provide supports to people receiving services to follow hand and face hygiene as much as possible.

Masks

As of July 25, 2020, per Governor's Executive Order, people in Minnesota are required to wear a face covering in all indoor businesses and public indoor spaces, unless you are alone. The following mask types will be allowed at Epic:

- Cloth or medical masks
- Epic supplied face covering
- Employee supplied face covering approved by Epic
- Epic will provide one cloth mask to individuals receiving services, if requested. Individuals receiving services may supply their own mask.

Mask usage:

- Drivers and riders will wear face masks while using Epic transportation or riding in an employee's vehicle.
- When providing support to people in community locations, staff and individuals served must wear masks.
 - When working outside for long periods of time, a procedure will be developed to determine if and when masks may be removed.
- Staff are provided training on the use of masks and face coverings.
- When working with people receiving direct services in the Epic building, employees are required to wear a mask or face covering at all times unless it impedes clear communication.
- If an employee is working alone in their office, room etc. a face covering is not required. However, if an employee is moving around the building with other employees on-site a face covering should be worn, or when working in an area with other employees.
- It's the responsibility of employees and individuals served (with their home supports) to wear clean masks each day.
- Any change in these mask protocols must be approved by a Program Director (including consideration of the following information from MDH).

Best Practices for Masks: Considerations for People with Disabilities and Special Health Needs (Minnesota Department of Health):

- Background: The use of masks may be a barrier for some people with disabilities, particularly for people who are deaf or hard of hearing, because masks eliminate lip

reading as an effective form of communication... We also know that some people with other challenges, such as sensory issues, might find it difficult to wear a facemask.

- In certain circumstances, the use of masks may not be reasonable and accommodations can be made. Accommodations include safe alternatives such as social distancing. Acknowledgement, flexibility, and support for people with disabilities and special health needs is critical during the COVID-19 pandemic.
- Minnesota's mask mandate exemptions include:
 - People who have medical or other health conditions, disabilities, or mental health, developmental, or behavioral needs that make it difficult to tolerate wearing a face covering.
 - Any person who has trouble breathing, is unconscious, sleeping, incapacitated, or is otherwise unable to remove the face covering without assistance.
- General Recommendations: For those who are unable to wear a mask, maintain a safe social distance of 6 feet whenever possible. Face shields may be an alternative for people who cannot wear masks due to medical or other conditions.
- For deaf or hard of hearing people:
 - People can remove their mask when asked to do so by someone who is deaf or hard of hearing, if they are able to maintain a safe social distance of 6 feet.
 - Using a face shield (clear plastic shield that covers the forehead, extends below the chin, and wraps around the sides of the face) instead of a facemask, protects the wearer and allows visibility of facial expressions and lip movements for speech perception.
 - Using speech-to-text apps, or writing notes on paper or mobile devices, may be effective.
 - Clear masks are an option.
- Some individuals receiving services may require further training and ongoing supports by Epic staff to accept wearing of masks. People receiving supports from Epic who are unable to wear masks need prior approval from a Program Director.

Remote Services

Services will be delivered by remote technology whenever appropriate according to Minnesota Department of Human Service guidance. The delivery of remote support must be real-time, two-way communication with the person (i.e. phone calls or use of other technology media currently available to the person.) Remote services may be provided to people who live in a single-family home or apartment and to people who live in provider-controlled residential settings (e.g. corporate adult foster care, family foster care, customized living). Those living in an ICF-DD are not eligible for these services. The provision of services through remote support must be performed within the scope of the covered services; the needs identified in the person's support plan; the amount of service authorized. Waivered remote services available include:

- Day Training and Habilitation
- Employment Development
- Employment Exploration
- Employment Supports

More specific information about remote support service functions can be found at:
<https://mn.gov/dhs/partners-and-providers/news-initiatives-reports-workgroups/long-term-services-and-supports/news/remote-functions.jsp>

Services funded through Vocational Rehabilitation Services and State Services for the Blind may also be delivered by remote technology whenever appropriate.

The Epic Program Coordinator/Program Director is responsible to assure the following documentation is in each person's record:

- Why the change in delivery of in-person services to remote support is needed related to COVID-19
- The person's choice to receive services remotely
- The person's chosen delivery method (e.g. telephone) to receive remote services
- How the chosen remote support method(s) of delivery will meet the person's health and safety needs and planned goals.

Specific Procedures for Use of Epic Building

Effective July 13, 2020, services may be provided in the Epic building to people who live in any setting (family home, their own home, group home, foster home or ICF-DD) and receive day training and habilitation (DT&H) or prevocational services. Effective August 12, 2020, community activities and events offered through DT&H or prevocational services may be provided in outdoor settings or indoor community facilities/buildings. If services are provided exclusively in the community (without any time in the Epic building), services may be delivered with a maximum duration of six hours per day. The procedures identified in this Preparedness Plan should be followed including creating and maintaining consistent cohorts of the same staff and people receiving services (10 or fewer) during the entire time day services are provided.

Building space

- To help ensure social distancing strategies can be implemented, Epic will serve no more than 50% of our licensed capacity at any one time.
- Program spaces are marked with maximum occupancy.
- Seating space will be arranged to maximize the space between person receiving services with at least 6 feet between seats. Whenever possible, seating should be turned in the same direction (rather than facing each other) to reduce transmission caused from virus-containing droplet created when people talk, cough, or sneeze.
- During mealtimes, staff who work directly with individuals should eat at different times and in a separate area at least 6 feet away from others.
- Visual aids (signs, painters tape, etc) will be posted throughout the Epic building as reminders about guidelines, expectations and responsibilities. External signs will also be posted on doors alerting visitors to restrictions on entry.
- People receiving services will be limited to a maximum of 4 hours of service in the building. (Transportation time may be in addition to the 4 hours.)
- An individual's DT&H services delivered in the community and in the building cannot exceed 6 hours per day. (Transportation time may be in addition to the 6 hours.)
- Services may be delivered in shifts. If so, the facility will be cleaned and disinfected between shifts. Epic will document the start and end time of each shift and the staff who worked those shifts.

- As much as possible, a 6-foot minimum distance will be maintained between all individuals while onsite.
- Epic has developed and will implement arrival and departure protocols that include social distancing strategies and other mitigation efforts, including staggering of arrival and departure times and minimizing congregating in groups at transition times.
- Epic will attempt to minimize the use of shared program supplies and establish cleaning protocols for these supplies.
- Until further notice, the Epic building will not be a transportation hub.
- The water fountain will not be available for use.
- Epic will maintain consistent cohorts of the same staff and persons receiving services to minimize cross-contamination between areas, individuals will be assigned to a specific area for the day and should remain in that area, with the exception of using the restroom. Individuals will be discouraged from walking throughout the building, including those who work in offices. Cohorts will consist of 10 or fewer people, including staff. Cohorts must be maintained throughout the program day, including meal times, and will also be maintained during the programming week whenever possible. If necessary, partitions or barriers will be set up to create physical barriers between cohorts.
- If a person becomes ill during the day and requires supervision, supervision must be provided in an isolated area away from others until a caretaker arrives to bring the person home. The Epic building has a designated quarantine area, away from other people, for an individual to use until they are able to leave the building. A Program Coordinator/Program Director should be notified immediately.

Building Care

When providing in-person programming, the building is cleaned daily by a professional cleaning service. Staff will be disinfecting high-touch areas throughout the service day and at the end of any mid-day shift, including tables and other surfaces, door handles, light switches, handles of restroom sinks/stall doors/toilets, phones, etc. Types of disinfectant products used will comply with guidelines from the Centers for Disease Control (CDC). Staff complete a checklist, identifying surfaces/equipment to be sanitized, the frequency at which sanitation occurs and the cleaning agent to be used.

If a staff or person served is diagnosed with COVID-19, we will follow the CDC guidelines below:

- Close off areas used by the person who is sick.
- Open outside doors and windows and use ventilating fans to increase air circulation in the area.
- Wait 24 hours or as long as practical before cleaning and disinfection.
- Clean and disinfect all areas used by the person who is sick, such as offices, bathrooms, common areas, shared electronic equipment like phones, touch screens, keyboards, remote controls, and other equipment, focusing especially on frequently touched surfaces.
- If more than 7 days since the person who is sick was inside a service location, additional cleaning and disinfecting is not necessary.
- Continue routine cleaning and disinfecting.

Heating, Ventilation and Air Condition Systems (HVAC)

Epic's HVAC system fans will run during occupied times (beginning 2-hours prior to occupancy) to promote air circulation throughout the building. Air is filtered by HVAC system air filters. The filters are replaced at least every 3 months or more frequently, if necessary. The percentage of outside air brought into our building through HVAC systems will be increased to promote fresh air circulation while continuing to keep dust particles and allergens to a minimum.

Employees workspace

- Remote work, flexible schedules and staggered shifts will be implemented to reduce the number of employees at Epic at one time.
- Staff who are not required onsite to deliver services are encouraged to work remotely.
- Employees are provided face masks (including a washable cloth face covering), a face shield and gloves. If needed, other protective supplies will be provided.
- Employees should refrain from using other people's phones, computer equipment, desks, workstations or personal work tools and equipment. When possible, employees may be assigned tablets for their individual use. A few computers and tablets will be designated as shared equipment with directions for safe handling.
- Vehicle keys should be sanitized prior to and after each use.
- Visitors are allowed for "essential business only".
 - Staff will oversee protocols for safe deliveries.
 - Visitors are required to wear a mask.

Communication and Training:

An initial COVID-19 Preparedness Plan was communicated to all Epic employees through e-mail on May 18th, 2020. In addition, mandatory zoom meetings were held on May 20th and 21st to discuss questions, concerns and comments. This modified Preparedness Plan will be provided in-person, via email, posted in our building and on the Epic website for employees, people receiving services, guardians, residential providers and case managers. This plan has been incorporated into our new staff orientation checklist. Additional employee communication and training will be ongoing through remote meetings, in-person meeting, phone calls etc. as needed and as guidelines continue to be revised. When appropriate, staff will explain in plain language the parts of this plan that are relevant to people receiving services. Supervisors will monitor how effective the plan has been implemented, by observation, discussion and communicating with employees and other stakeholders. The plan will be revised and updated accordingly to maximize its effectiveness.