

**U.S. Department of Labor** Occupational Safety and Health Administration  
380 Westminister St.  
Room 543  
Providence, RI 02903



05/24/2021

North Providence Urgent Care, Inc., North Providence Primary Care Associates, Inc., Center of New England Urgent Care, Inc. and Center of New England Primary Care, Inc.  
and its successors  
1830 Mineral Spring Avenue #1  
North Providence, RI 02904

Dear Employer:

Enclosed you will find citations for violations of the Occupational Safety and Health Act of 1970 (the Act) which may have accompanying proposed penalties. Also enclosed is a booklet entitled, "Employer Rights and Responsibilities Following an OSHA Inspection", (OSHA 3000-04R) revised 2018, which explains your rights and responsibilities under the Act. If you have any questions about the enclosed citations and penalties, I would welcome further discussions in person or by telephone. Please contact me at (401) 528-4669.

You will note on page 6 of the booklet that, for violations which you do not contest, you must (1) notify this office promptly by letter that you have taken appropriate corrective action within the time set forth on the citation; and (2) pay any penalties assessed. Please inform me of the abatement steps you have taken and of their dates together with adequate supporting documentation; e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results. This information will allow us to close the case.

As indicated on page 3 of the booklet, you may request an informal conference with me during the 15-working-day notice of contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of the citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete the attached notice at the bottom of this letter and post it next to the Citations as soon as the time, date and the place of the informal conference have been determined. Be sure to bring to the conference with you any and all supporting documentation of existing conditions as well as of any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at [www.osha.gov](http://www.osha.gov). If you have any dispute with the accuracy of the information displayed, please contact this office.

Sincerely,



**Robert J. Sestito, CSP**  
Area Director

Enclosures

**U.S. Department of Labor**  
Occupational Safety and Health Administration  
380 Westminister St.  
Room 543  
Providence, RI 02903



## Citation and Notification of Penalty

**To:**  
North Providence Urgent Care, Inc., North Providence  
Primary Care Associates, Inc., Center of New England  
Urgent Care, Inc. and Center of New England Primary  
Care, Inc.  
and its successors  
1830 Mineral Spring Avenue #1  
North Providence, RI 02904

**Inspection Number:** 1511619  
**Inspection Date(s):** 01/26/2021-05/18/2021  
**Issuance Date:** 05/24/2021

**Inspection Site:**  
1830 Mineral Spring Avenue #1  
North Providence, RI 02904

*The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.*

This Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty **you either call to schedule an informal conference (see paragraph below) or** you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. Please refer to the enclosed booklet (OSHA 3000) which outlines your rights and responsibilities and which should be read in conjunction with this form. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.

**Posting** - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

**Informal Conference** - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period by calling

(401) 528-4669. During such an informal conference, you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post the Notice to Employees next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

**Right to Contest** – You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. **Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.**

**Penalty Payment** – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance. You can also make your payment electronically at [www.pay.gov](http://www.pay.gov). At the top of the [pay.gov](http://www.pay.gov) homepage, type "OSHA" in the Search field and select Search. From **OSHA Penalty Payment Form** search result, select Continue. The direct link is:

<https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>

You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will process the payments as if these restrictions or conditions do not exist.

**Notification of Corrective Action** – For each violation which you do not contest, you must provide **abatement certification** to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that **abatement documentation** is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, training records, etc., verifying that abatement has occurred is required to be provided to the Area Director.

**Employer Discrimination Unlawful** – The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

**Employer Rights and Responsibilities** – The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

**Notice to Employees** – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

**Inspection Activity Data** – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at [www.osha.gov](http://www.osha.gov). If you have any dispute with the accuracy of the information displayed, please contact this office.



## NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 05/24/2021. The conference will be held by telephone or at the OSHA office located at 380 Westminster St. Room 543, Providence, RI 02903 on \_\_\_\_\_ at

\_\_\_\_\_. Employees and/or representatives of employees have a right to attend an informal conference.

**CERTIFICATION OF CORRECTIVE ACTION WORKSHEET**

**Inspection Number: 1511619**

Company Name: North Providence Urgent Care, Inc., North Providence Primary Care Associates, Inc., Center of New England Urgent Care, Inc. and Center of New England Primary Care, Inc.

Inspection Site: 1830 Mineral Spring Avenue #1, North Providence, RI 02904

Issuance Date: 05/24/2021

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 380 Westminister St. Room 543, Providence, RI 02903.**

Citation Number \_\_\_\_\_ and Item Number \_\_\_\_\_ was corrected on \_\_\_\_\_  
By (Method of Abatement): \_\_\_\_\_

Citation Number \_\_\_\_\_ and Item Number \_\_\_\_\_ was corrected on \_\_\_\_\_  
By (Method of Abatement): \_\_\_\_\_

Citation Number \_\_\_\_\_ and Item Number \_\_\_\_\_ was corrected on \_\_\_\_\_  
By (Method of Abatement): \_\_\_\_\_

Citation Number \_\_\_\_\_ and Item Number \_\_\_\_\_ was corrected on \_\_\_\_\_  
By (Method of Abatement): \_\_\_\_\_

Citation Number \_\_\_\_\_ and Item Number \_\_\_\_\_ was corrected on \_\_\_\_\_  
By (Method of Abatement): \_\_\_\_\_

Citation Number \_\_\_\_\_ and Item Number \_\_\_\_\_ was corrected on \_\_\_\_\_  
By (Method of Abatement): \_\_\_\_\_

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Typed or Printed Name

\_\_\_\_\_  
Title

**NOTE: 29 USC 666(g)** whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

**POSTING:** A copy of completed Corrective Action Worksheet should be posted for employee review



### Citation and Notification of Penalty

**Company Name:** North Providence Urgent Care, Inc., North Providence Primary Care Associates, Inc., Center of New England Urgent Care, Inc. and Center of New England Primary Care, Inc.  
**Inspection Site:** 1830 Mineral Spring Avenue #1, North Providence, RI 02904

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#### Citation 1 Item 1    Type of Violation: **Willful - Serious**

OSH ACT of 1970 Section (5)(a)(1): The employer did not furnish employment and a place of employment which were free from recognized hazards that were causing or likely to cause death or serious physical harm to employees in that employees were not protected from the hazard of contracting the virus, SARS-CoV-2 (severe acute respiratory syndrome coronavirus 2), the cause of the COVID-19 disease, which can cause death:

a) North Providence Urgent Care, Inc. and North Providence Primary Care Associates, Inc. located at 1830 Mineral Spring Avenue, North Providence, RI and Center of New England Urgent Care, Inc. and Center of New England Primary Care, Inc. located at 775 Centre of New England Boulevard, West Greenwich, RI:

On or about November 25, 2020, a doctor displayed symptoms consistent with COVID-19 and continued to interact with employees in the North Providence and West Greenwich practices. This doctor tested positive for COVID-19 on December 4, 2020 and continued working throughout the four practices.

Employees working in the North Providence Urgent Care facility worked in close proximity to each other in areas including, but not limited to, the reception area. The employer did not implement engineering controls, such as portable high-efficiency particulate air (HEPA) fan/filtration systems or barriers between adjacent desks. Administrative controls such as, but not limited to, cleaning, disinfecting, and symptom screening of employees were also neglected.

The doctor did not initiate contact tracing or quarantine after close contact with a patient who was exposed to COVID-19. Subsequent exposure and after receiving a positive COVID-19 test result, the doctor did not quarantine from the workplace(s). The doctor's continued work throughout the practices facilitated the spread of COVID-19 within the four practices during the week of November 29, 2020 through December 5, 2020, where six employees tested positive for COVID-19.

Feasible and useful methods to correct the hazard include, but are not limited to:

- 1) Conduct a thorough hazard assessment of all four locations and the various job duties to identify potential workplace hazards that could increase risks for COVID-19 transmission. <sup>1</sup>
- 2) Implement engineering controls such as barriers, partitions, and distance. Move furniture or desks so that they are further apart, and install physical barriers or partitions between workstations. <sup>2</sup>

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.





### **Citation and Notification of Penalty**

**Company Name:** North Providence Urgent Care, Inc., North Providence Primary Care Associates, Inc., Center of New England Urgent Care, Inc. and Center of New England Primary Care, Inc.  
**Inspection Site:** 1830 Mineral Spring Avenue #1, North Providence, RI 02904

3) Implement engineering controls such as mechanical ventilation to improve ventilation in spaces as needed and HEPA filtration to reduce levels of airborne virus. For spaces that have HVAC and mechanical ventilation systems, ensure that they operate properly and provide acceptable indoor air quality for the current occupancy level and the purpose of the space (for example patient exam room or office). Ensure that bathroom ventilation and fans are operational. Where mechanical ventilation is not available, use natural ventilation (i.e., opening windows if possible and safe to do so) and fans to improve ventilation. Check current OSHA and CDC guidance for additional ventilation options.

4) Ensure that screening is done for everyone (patients, Health Care Providers, employees and management employees) entering the offices, and is done consistently and with appropriate documentation.

5) Consider acquiring and administering COVID-19 vaccines to employees. Encourage all employees to get vaccinated and provide accommodations to allow employees to take time off to get vaccinated as well as recover from any potential side effects.

6) Enforce the use of well-fitting face coverings (masks) over the nose and mouth at all times in healthcare facilities, including in breakrooms or other spaces where employees might encounter co-workers.

7) When a Health Care Provider is sick with symptoms of COVID-19 or has been advised to self-quarantine, HCP should follow CDC Guidelines including but not limited to: returning home and notifying appropriate management, occupational health services, and health care providers.

8) Use contact tracing to ensure that employees who work in close contact to co-workers who have tested positive for COVID-19, and/or are awaiting test results, are informed, tested, and quarantined per CDC Guidance for Contact Tracing for COVID-19.<sup>3</sup>

9) Follow CDC guidelines for cleaning and disinfecting the work area when an employee is sick or has a COVID-19 diagnosis. Close off work areas used by the person who is sick and increase air circulation in the area. Wait 24 hours before allowing employees to enter the area to begin cleaning or disinfecting the workspace where feasible, such as in office areas, patient treatment rooms, and the reception area.

<sup>1</sup> Centers for Disease Control and Prevention (CDC), Resuming Business TOOLKIT Coronavirus Disease 2019 (COVID-19), Interim Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 (COVID-19), May 2020, at: <https://www.cdc.gov/coronavirus/2019-ncov/downloads/community/Resuming-Business-Toolkit.pdf>

<sup>2</sup> Centers for Disease Control and Prevention (CDC), Control Coronavirus Disease 2019 (COVID-19), Workplace Decision Tool, at: <https://web.archive.org/web/20200615143612/https://www.cdc.gov/>

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

**U.S. Department of Labor**  
Occupational Safety and Health Administration

**Inspection Number:** 1511619  
**Inspection Date(s):** 01/26/2021 - 05/18/2021  
**Issuance Date:** 05/24/2021



**Citation and Notification of Penalty**

**Company Name:** North Providence Urgent Care, Inc., North Providence Primary Care Associates, Inc.,  
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<sup>3</sup> Centers for Disease Control and Prevention (CDC), Case Investigation and Contact Tracing in Non-healthcare Workplaces: Information for Employers, at: <https://www.cdc.gov/coronavirus/2019-ncov/community/contact-tracing-nonhealthcare-workplaces.html>

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

July 09, 2021  
\$136,532.00

A handwritten signature in blue ink that reads "Robert J. Sestito".

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**Robert J. Sestito, CSP**  
Area Director

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

**U.S. Department of Labor**  
Occupational Safety and Health Administration  
380 Westminister St.  
Room 543  
Providence, RI 02903



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**INVOICE /  
DEBT COLLECTION NOTICE**

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**Company Name: North Providence Urgent Care, Inc., North Providence Primary Care Associates, Inc.,  
Center of New England Urgent Care, Inc. and Center of New England Primary Care, Inc.**  
**Inspection Site: 1830 Mineral Spring Avenue #1, North Providence, RI 02904**  
**Issuance Date: 05/24/2021**

**Summary of Penalties for Inspection Number: 1511619**

Citation 1 Item 1, Willful - Serious	\$136,532.00
<b>TOTAL PROPOSED PENALTIES:</b>	<b>\$136,532.00</b>

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To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically at [www.pay.gov](http://www.pay.gov). At the top of the pay.gov homepage, type "OSHA" in the Search field and select Search. From the **OSHA Penalty Payment Form** search result, select Continue. The direct link is: <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will cash the check or money order as if these restrictions or conditions do not exist.

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to two times.

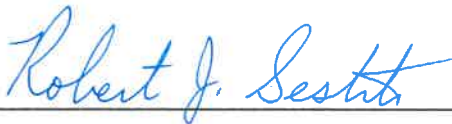
Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of

Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.

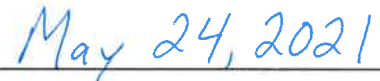
**Interest:** Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

**Delinquent Charges:** A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

**Administrative Costs:** Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.



**Robert J. Sestito, CSP**  
Area Director



Date