

## I. Identify and designate appropriate personnel for Coronavirus Response Committee:

- a. Include key decision-makers with authority to address safety, operations, human resources and IT issues and identify individuals responsible for monitoring new information and informing the Committee about potential need to revise Plan based on the development of such new information;
- b. Identify local and state health department points of contact;
- c. Identify local and state emergency preparedness groups and organizations, including bioterrorism/communicable disease coordinators;
- d. Identify area clinics and hospitals and their points of contact closest to workforce concentration(s); and
- e. Identify list of mental health and faith-based resources that will be available to provide counseling to personnel, if needed.

## II. Identify Goals & Expectations of the Coronavirus Response Plan:

- a. Define avenues of employee communication;
- b. Define appropriate employee training, including use of protective equipment, hygiene practices or remote access policies;
- c. Define criteria of progression for escalating phases of Coronavirus Response Plan; and
- d. Define roles of key decision-makers in Coronavirus Response Plan.

## III. Coronavirus Response Plan Phases and Framework:

### a. Phase 1 – Mitigation & Assessment (no imminent threat)

- i. Creating a Culture of Infection Control: Hygiene Control of Workforce (recommended or mandatory)
  1. Implement Respiratory Hygiene/Cough Etiquette throughout facility
  2. Consider whether to provide and/or allow employees to wear respiratory masks/possible accommodation issues under ADA.
    - a. Surgical Face Mask v. N95 or similar respirators (fit testing)
    - b. Application of Appendix D to Sec. 1910.134 (Mandatory) Information for Employees Using Respirators When Not Required Under the Standard
  3. Consider providing other equipment for employees to self-monitor for symptoms, (e.g., thermometer temperature guns)
  4. Hand washing protocols
  5. Intensified janitorial cleaning of worksite and common areas
  6. Estimate costs and begin logistics planning for extended use of hygiene materials (e.g. masks, gloves, sanitizer, etc).

### ii. Communication Channels

1. Identify person(s) responsible for receiving informational updates
2. Identify person(s) responsible for communicating to Coronavirus Response Team and/or workforce regarding informational updates distributed by company or state and local officials
3. Identify person(s) responsible for communicating with state and local officials
4. Identify methods of communicating with workforce, family members, visitors and other persons entering facilities (e.g. sales and delivery personnel) about status of operations or quarantine event at facility
5. Identify union representative point of contact and potential collective bargaining issues, if applicable
6. Identify key vendor point of contacts to ensure open line of communication

### iii. Implement Mandatory Informational Reporting

1. Mandatory reporting for any employees, family members or persons living in close quarters of any recent travel to countries listed on Travel Advisory List (CDC or equivalent), cruises, or other potential hot spots
2. Encourage reporting of observable symptoms
3. Protocol for identification of observable symptoms and separation of employees to designated area
4. Surveillance and monitoring of employees with observable symptoms
5. Ensure proper personal protective equipment is available and employees are trained on such use, if applicable

### iv. Encourage/mandate employees to stay home if not feeling well or been in contact with at-risk travel location or infected person

1. Define types of sickness covered under policy, including respiratory illness, fever or other Covid-19 symptoms
2. Evaluate and consider payment for sick leave and self-quarantines

### v. Implementation of limits on business travel to affected areas

### b. Phase 2 – Remedial Measures (Community Outbreak)

- i. Evaluate and consider additional changes to sick leave policy and other applicable paid leave policies
  1. Mandatory exclusion from worksite of persons with observable symptoms
    - a. Who determines observable symptoms?  
Who is policing?
  2. Create protocol for handling of personnel who demonstrate symptoms while at work
  3. Identify procedure for personnel returning to work after sickness or diagnosis with Covid-19
  4. Review policy for personnel who need to care for family member who becomes ill and application of FMLA rights

5. Consider waiving health care certification requirements under sick leave policy and/or other abuse provisions in paid leave policies to allow liberal use, (e.g., waiving notice requirements or prohibitions against using leave on or before a holiday)
  6. Identify disabled or at-risk employees and potential accommodations available
- ii. Flexible Scheduling
    1. Consider emergency PTO Policy allowing employees to accrue a negative balance or get advance on PTO time
    2. Implement expanded work from home arrangements
    3. Consider modification of employee shifts to minimize overlap and avoid peak commute times on public transportation
    4. Consider strategies to address childcare issues based on local school district response plans
  - iii. Contingency Staffing Plan
    1. Identify minimum staffing needs and prioritize critical vs. non-essential services
    2. Designate person(s) responsible for daily staffing assessment, including mandatory communication of this assessment with Coronavirus Response Committee responsible for Plan
    3. Identify contingency plans for payroll and other critical services if key personnel or vendors are unavailable
  - iv. Supply Chain Shortages
    1. Identify areas of weakness in supply chain
    2. Procure alternative channels for resources necessary to sustain operations
    3. Identify potential impacts of supply chain issues on staffing levels and consider advance notice to employees regarding layoffs or reduction in hours – consider notice requirements under federal/state law and applicable union contracts
    4. Review applicable vendor contracts to determine potential sources of contractual liability including force majeure clauses
- c. *Phase 3 – Emergency Measures (Quarantine/Temporary Shutdowns)*
    - i. Create plan for orderly shutdown of affected areas/portions of business operations and potential safety issues
    - ii. Identify when additional environmental cleaning is necessary and appropriate; identify vendors
    - iii. Identify backup work locations for critical personnel
    - iv. Implement Emergency Payroll Policies
      1. Ensure continuity and compliance with state wage payment laws
      2. Consider temporary reductions in pay for areas affected by shutdowns or quarantines
      3. Consider rolling furloughs in areas with diminished demand for services
      4. Announcements to Impacted Employees/Facilities
      5. Emergency communication methods
      6. Compliance with state/federal laws and union contracts
    - v. Return to Work
      1. Define avenues of notification of re-opening
      2. Identify criteria for return to work in affected areas, including mandatory temperature checks, physical examinations, or documentation
      3. Establish employee assistance programs/counseling services for employees and their families affected
    - vi. Security of Property and Assets During Shutdowns
      1. IT access during shutdowns and security of networks
      2. Security of company assets
      3. Safety concerns regarding physical work sites that require monitoring, such as plants, chemical storage, etc. and necessary critical personnel

# Sample FAQ for Employees

Employers should consider a practical communication to employees summarizing the company's response plan and its impact on employees. Each employer will have different answers to these questions based on its unique considerations and needs, but the following are some suggested answers to common questions. These answers may change based on company policy, or state or local laws. Each company should review these answers to ensure they comport with the practical and legal requirements, which may be rapidly changing.

## 1. How will my company be impacted by the coronavirus and what is the plan?

The current situation is an evolving health emergency which can change quickly from day to day. It is difficult to predict the nature of the impact on the Company, or where and when such an impact will occur. The Company has developed contingency plans and will be communicating applicable changes in employment policies and safety procedures to employees on an ongoing basis. Please read and follow these instructions and if you have questions please contact your immediate manager or Human Resources.

## 2. Are there any special precautions I should be taking at work in terms of hygiene?

Wash hands frequently with soap and water for at least 20 seconds. If soap and water are not available, use an alcohol-based hand sanitizer. Avoid, if possible, touching door handles and other points of frequent contact and avoid touching your eyes, nose, and mouth with unwashed hands. Cough into your sleeve or sneeze with a tissue, then throw the tissue in the trash.

## 3. Is the company implementing any restrictions on business travel?

The CDC has issued a travel advisory for certain countries and the Company has updated its travel restriction to prohibit ALL non-essential international business travel. If you feel you must travel on company business to another country, please contact your Human Resources department so we can determine the best course of action.

## 4. What if myself or a member of my household has recently traveled to an impacted country or state?

Any employee who has traveled or plans to travel to any country on the CDC travel advisory list or an international cruise (or who has an immediate family member who has traveled to such locations) should contact Human Resources for further instruction. Employees may be asked to work from home or remain away from the workplace for up to fourteen (14) days after return from any such locations.

## 5. Can I wear a mask or other protective equipment at work?

The Company is committed to protecting the safety of all employees and will follow all applicable instructions from public health officials regarding protective measures. The current guidance from health officials is that masks are not necessary or effective in reducing the risk of exposure for most people, and that limited supplies should be reserved for healthcare workers. If you have an underlying medical condition or other risk factor that you believe requires special consideration, please contact the Human Resources department.

## 6. If I feel sick at work, what should I do?

Early symptoms of COVID-19 can look like a cold or the flu and can vary in intensity. If you are experiencing any of the following symptoms – fever, cough, shortness of breath – please notify a member of management and leave the workplace immediately. If you need urgent medical attention, please notify management so that the company can seek medical help.

Call your healthcare provider in advance of showing up to the doctor's office or urgent care center so that they can take proper precautions or direct you to the appropriate location for care. Do not return to the workplace until you are symptom free and cleared by your healthcare provider.

## 7. If I am unable to work because of sickness, how will I be paid?

Employees diagnosed with Covid-19 or required by a health official or physician to self-quarantine because of exposure to Covid-19 may be eligible for special emergency leave under company policy for up to two weeks. The Company continues to review its employment policies in this area and will announce any additional measures in the event they are deemed necessary to maintain a safe workplace or ensure employees are not unfairly impacted by this health emergency.

## 8. If I encounter someone in the workplace who is sick, what should I do?

If you believe that a coworker, contractor, vendor, customer or other person in the workplace is demonstrating symptoms of a respiratory illness, please notify your immediate supervisor or Human Resources professional as soon as possible. Please do not confront any individual about his/her medical condition, and any discrimination or harassment based on national origin, age, disability or any other protected category is a serious matter and may result in disciplinary action.

## 9. What if my schools are closed and I cannot find childcare arrangements – can I bring my children to work?

It is expected that many school districts may temporarily close schools for short or even lengthy periods of time. The Company is committed to working with employees on available options in such instances, including flexible work schedules, but does not have any current plans to allow employees to bring children to work. We encourage employees to identify alternative childcare arrangements and make plans now for such contingencies before they occur.

## 10. What is the Company's policy on working from home?

The Company is reviewing its work from home policy in real time and will be announcing options to employees based on local developments and recommendations from health officials. Employees able to work from home should make preparations to do so on an extended basis if made necessary by local conditions. Any employee who desires to work from home because of a safety concern or other risk factor that places the employee at a unique risk of illness, should contact the Human Resources department.

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