



## **DISABILITY NETWORK SOUTHWEST MICHIGAN**

### **COVID-19 PREPAREDNESS AND RESPONSE PLAN**

Updated November 11, 2020

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## **DISABILITY NETWORK SOUTHWEST MICHIGAN**

### **COVID-19 PREPAREDNESS AND RESPONSE PLAN**

Disability Network Southwest Michigan takes the health and safety of our employees seriously. We are committed to reducing the risk of exposure to COVID-19 and to providing a healthy and safe workplace for our employees.

This Plan is based on information and guidance from the CDC and OSHA at the time of its development, and is subject to change based on further information provided by the CDC, OSHA, and other public officials. Disability Network may also amend this Plan based on operational needs. This plan will be made available to employees via agency email and will be made available to customers (on our website, via social media, upon request, etc). This plan pertains to all Disability Network staff and worksites, where applicable.

Disability Network has identified the following potential sources to spread COVID-19 in the workplace:

- Co-workers
- Customers/Community Partners
- Vendors, visitors and the general public

Employees fall into the Lower or Medium exposure risk as described by the categories below:

- Lower exposure risk (the work performed does not require direct contact with people known or suspected to be infected with COVID-19 or frequent close contact with the public).
- Medium exposure risk (the work performed requires frequent and/or close contact with people who may be infected with COVID-19 but who are not known COVID-19 patients, or contact with the general public in areas where there is ongoing community transmission).
- High exposure risk (healthcare delivery and support staff exposed to known or suspected COVID-19 patients; medical transport workers moving known or suspected COVID-19 patients in enclosed vehicles; mortuary workers involved in preparing the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death).

### **COVID-19 WORKPLACE COORDINATOR**

The Company has designated the following individual as its COVID-19 Workplace Coordinator: Kristen Potts, Resource Development Director. According to Gov. Whitmer's Executive Order 2020-92, the Workplace Coordinator must be present at the

workplace whenever more than one employee is present. In her absence, the Coordinator may designate another Coordinator to temporarily administer the Plan.

The Coordinator can be reached at the following:

Phone numbers: Office: 269-345-1516 x 119

Email address: [pottsk@dnswm.org](mailto:pottsk@dnswm.org)

## **RESPONSIBILITIES OF SUPERVISORS AND MANAGERS**

All managers and supervisors must be familiar with this Plan and be ready to answer questions from employees. Managers and supervisors must set a good example by following this Plan at all times. This involves practicing good personal hygiene and on the job safety practices to prevent the spread of the virus. Managers and supervisors must encourage this same behavior from all employees.

## **RESPONSIBILITIES OF EMPLOYEES**

Disability Network is asking every one of our employees to help with our prevention efforts while at work. In order to minimize the impact of COVID-19 at our worksite, everyone must play their part. It's all about personal protection. Please keep yourself safe. As set forth below, Disability Network has instituted various housekeeping, social distancing, and other best practices at our workplace to minimize exposure to COVID-19 and prevent its spread. All employees must follow these best practices at all times for them to be effective. Beyond these best practices, Disability Network requires employees to report immediately to their supervisor if they are experiencing signs or symptoms of COVID-19, as described below. If employees have a specific question about this Plan or COVID-19, they should ask their supervisor for information. If employees would like to report a hazardous work environment, they should contact the President & CEO at 269-345-1516, ext. 105 or [cooperj@dnswm.org](mailto:cooperj@dnswm.org).

OSHA and the CDC have provided the following control and preventative guidance for all workers, regardless of exposure risk:

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand sanitizer with at least 60% alcohol.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering your mouth and nose with a tissue for coughs and sneezes. Do not use your hand to cover your cough. You can also cough into your elbow.
- Avoid close contact with people who are sick.
- If an employee is sick, they are not permitted to work in any of Disability Network's three buildings or in the community representing Disability Network (per MIOSHA order dated 10.14.20, updated 10.29.20)

- While there is community spread of COVID-19, maintain appropriate social distance of six feet to the greatest extent possible.

In addition, employees must familiarize themselves with the symptoms and exposure risks of COVID-19. The primary symptoms of COVID-19 include the following and can appear 2-14 days after exposure and range from mild to severe illness:

- Cough
- Shortness of breath or difficulty breathing
- Fever
- Chills
- Repeated shaking with chills
- Muscle pain
- Headache
- Sore throat
- New loss of taste or smell
- Vomiting
- Diarrhea
- Other respiratory problems

If an employee develops a fever over 100.4 degrees Fahrenheit and symptoms of respiratory illness, such as an atypical cough or shortness of breath, they must not report to work (either onsite or in the general public) and should notify their supervisor immediately and consult their healthcare provider. Other concerning symptoms such as cough, shortness of breath or difficulty breathing, chills, body aches or muscle pain, sore throat, headache, diarrhea, nausea/vomiting and new loss of smell or taste should encourage employees to refrain from working onsite, with customers, or the general public. Because it may be likely that multiple people may become ill at the same time, staff are required to provide as much advance notice as possible to their supervisor to cover required responsibilities.

Employees will be required to conduct a self-screening daily to enter the workplace or begin work in the general public on behalf of the agency. The self-screening, at a minimum, includes a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19. Employees are required to complete the Microsoft DNSWM COVID-19 Workplace Health Screening form.

If an employee develops the symptoms described above while at work, the employee will immediately initiate separation from other employees, customers, and the general public and notify their supervisor. Employees with these symptoms will be requested to leave work. If the employee is unable to immediately leave the workplace, they will isolate in an appropriate area. In the Kalamazoo office, Conference Room A will serve as an isolation area (per MIOSHA order dated 10.14.20, updated 10.29.20)

If employees come into close contact (either at work or outside of work) with someone showing these symptoms, they must notify their supervisor immediately and consult their healthcare provider.

Close contact for this policy will be defined as being within approximately six feet of a COVID-19 infected person or a person with any COVID-19 symptom(s) for least 15 minutes starting from 2 days before the illness onset (or, for asymptomatic patients, 2 days prior to specimen collection) until the time the person isolated (per MIOSHA order dated 10.14.20, updated in plan 10.29.20)

Employees with a known or confirmed case of COVID-19 will be allowed to return to the workplace only after they are no longer infectious according to the latest guidelines from the CDC and they are released from any quarantine or isolation order by the local public health department (per MIOSHA order dated 10.14.20, updated in plan 10.29.20).

### **Remote Work from Home**

As of March 23, 2020, Governor Whitmer's Stay at Home and Safer at Home Executive Orders directs everyone to remain at home or in their place of residence to the maximum extent feasible. Thus, to comply with these orders, our office will be completely closed effective Tuesday, March 24, at 12:01 am and until the Governor releases any and all orders pertaining to restrictions in the workplace.

Employees will be allowed to Remote Work from home during this time. All Disability Network policies and procedures as indicated in the Employee Handbook and HIPAA Policy and Procedures continue to be in effect, including, but not limited to:

- In an effort to support our employees during this health crisis, Disability Network recognizes that a flexible work schedule is key to managing a positive work/life balance. Staff are encouraged to manage their own work from home schedule to meet the needs of the agency, customers and their personal needs. If a staff person desires to take PTO, they must communicate with their supervisor immediately.
- If an employee does not work a full day (based upon their normal work schedule), they must document the hours not worked in NetCIL under office closure.
- Correct use and sign out of equipment, including laptops. Any remote devices such as laptops, smart phones or notepads that are integrated with the computer system will be secured with passwords, appropriate fingerprint access, or encryption.

- The provision of a cell phone/internet stipend for use of personal equipment depending on length of time of remote work.
- Protecting Disability Network's and customer information by following all Disability Network's policies and procedures, including HIPAA policies and procedures.

### **Workers Required to Conduct Minimum Basic Operations**

The Executive Order does allow workers required to conduct minimum basic operations to report to work to maintain critical operations only. The worker required to conduct minimum basic operations will retrieve and process our mail and handle anything that must absolutely be done within the office. **No one else is to come to the office without express approval from the Worker required to conduct minimum basic operations. There will be only one person within the building at a time, working at their own workstation.** All other staff are to work from home by using Remote PC.

### **Emergency Paid Sick Leave and the Emergency Paid Medical Leave Act**

The HR 6201 - the *Families First Coronavirus Response Act* - was signed into law March 18, becomes effective Wednesday, April 1, 2020 and extends through December 31, 2020. **If you cannot work (or telework) due to any aspects of the law, either now, or in the future, please let your supervisor know immediately upon the situation so that a Request for PTO form can be completed.**

# EMPLOYEE RIGHTS

## PAID SICK LEAVE AND EXPANDED FAMILY AND MEDICAL LEAVE UNDER THE FAMILIES FIRST CORONAVIRUS RESPONSE ACT

The Families First Coronavirus Response Act (FFCRA or Act) requires certain employers to provide their employees with paid sick leave and expanded family and medical leave for specified reasons related to COVID-19. These provisions will apply from April 1, 2020 through December 31, 2020.

### ► PAID LEAVE ENTITLEMENTS

Generally, employers covered under the Act must provide employees:

Up to two weeks (80 hours, or a part-time employee's two-week equivalent) of paid sick leave based on the higher of their regular rate of pay, or the applicable state or Federal minimum wage, paid at:

- 100% for qualifying reasons #1-3 below, up to \$511 daily and \$5,110 total;
- $\frac{2}{3}$  for qualifying reasons #4 and 6 below, up to \$200 daily and \$2,000 total; and
- Up to 12 weeks of paid sick leave and expanded family and medical leave paid at  $\frac{2}{3}$  for qualifying reason #5 below for up to \$200 daily and \$12,000 total.

A part-time employee is eligible for leave for the number of hours that the employee is normally scheduled to work over that period.

### ► ELIGIBLE EMPLOYEES

In general, employees of private sector employers with fewer than 500 employees, and certain public sector employers, are eligible for up to two weeks of fully or partially paid sick leave for COVID-19 related reasons (see below). *Employees who have been employed for at least 30 days prior to their leave request may be eligible for up to an additional 10 weeks of partially paid expanded family and medical leave for reason #5 below.*

### ► QUALIFYING REASONS FOR LEAVE RELATED TO COVID-19

An employee is entitled to take leave related to COVID-19 if the employee is unable to work, including unable to telework, because the employee:

- |   |   |
|---|---|
| <ol style="list-style-type: none"><li>1. is subject to a Federal, State, or local quarantine or isolation order related to COVID-19;</li><li>2. has been advised by a health care provider to self-quarantine related to COVID-19;</li><li>3. is experiencing COVID-19 symptoms and is seeking a medical diagnosis;</li><li>4. is caring for an individual subject to an order described in (1) or self-quarantine as described in (2);</li></ol> | <ol style="list-style-type: none"><li>5. is caring for his or her child whose school or place of care is closed (or child care provider is unavailable) due to COVID-19 related reasons; or</li><li>6. is experiencing any other substantially-similar condition specified by the U.S. Department of Health and Human Services.</li></ol> |
|---|---|

### ► ENFORCEMENT

The U.S. Department of Labor's Wage and Hour Division (WHD) has the authority to investigate and enforce compliance with the FFCRA. Employers may not discharge, discipline, or otherwise discriminate against any employee who lawfully takes paid sick leave or expanded family and medical leave under the FFCRA, files a complaint, or institutes a proceeding under or related to this Act. Employers in violation of the provisions of the FFCRA will be subject to penalties and enforcement by WHD.



WAGE AND HOUR DIVISION  
UNITED STATES DEPARTMENT OF LABOR

For additional information  
or to file a complaint:  
**1-866-487-9243**  
TTY: 1-877-889-5627  
[dol.gov/agencies/whd](https://dol.gov/agencies/whd)



WH1422 REV 03/20

## WORKSITE PREVENTATIVE MEASURES

**Minimizing exposure from co-workers.** Disability Network will take the following steps to minimize exposure from co-workers to COVID-19, these steps will be implemented during each phase of Disability Network's reopening plan:

- Educate employees on protective behaviors that reduce the spread of COVID-19 and provide employees with the necessary tools for these protective behaviors, including:
  - Posting CDC or other state or local information, including recommendations on risk factors.
  - Providing tissues and no-touch garbage cans to minimize exposure to infectious secretions.
  - Inform employees of the importance of good hand hygiene. Regularly washing hands with soap and water for at least 20 seconds is one of the most effective ways for employees to minimize exposure to COVID-19. If soap and water are not readily available, employees should use alcohol-based hand sanitizer that is at least 60% alcohol. If hands are visibly dirty, soap and water should be chosen over hand sanitizer.
  - Encourage good hand hygiene by ensuring that adequate supplies of soap and hand sanitizer are maintained and placing hand sanitizers in multiple locations.
  - Not allow handshaking and instead encourage the use of other non-contact methods of greeting.
  - Restrict access to other employees' phones, desks, offices, other work tools (staplers, pens, staple pullers, scissors, etc.) and equipment. When employees come into contact with commonly touched items or equipment, they should wash or sanitize their hands BEFORE and AFTER use. Also restrict access by visitors and customers to employee workstations.
  - Kitchen use: Kitchens in each office can be used, as long as proper cleaning can occur. In the Kalamazoo office, the kitchen will be cleaned each day after the office has been in use. During the day, please sanitize your hands and/or clean equipment as you use it. The fridge, microwave, toaster and Keurig machine will be in use; the coffee station will continue to be closed. Water coolers will be moved to a central location and can be used. Additional common areas that will be closed include: Conference Room A, the computer lab, Conference Room B.
  - Require social distancing (6 ft) to the greatest extent possible while in the workplace. Employees should not meet in each other's offices but should use technology to interact when needed. Additionally, there will be no more than one employee in the copy/mail room, reception area, or waiting room at any one time.
  - Provide masks to all employees. Masks do not need to be worn within an employee's individual office or work station as long as there is 6 feet of social

distancing. Employees should wear their mask if they leave their individual office or work station to visit common areas.

- Ride-sharing, with more than one staff member in a vehicle, will not be allowed. Employees can utilize public transit or private transportation for work travel and are to wear a mask, if able, for this travel.
  - Transporting customers or volunteers will not be allowed.
  - All nonessential travel on behalf of the agency is not allowed.
  - Allowing remote work from home.
- Develop protocol for social distancing practices.
  - Restrict employees from the workplace if they display symptoms of COVID-19.
  - Actively encourage sick employees or employees who have been in close contact with a confirmed or suspected case of COVID-19 to stay home.
  - If an employee has a confirmed case of COVID-19 (Coronavirus), the CEO or designee will implement the following protocol;\*
  - Within 24 hours, notify the local public health department and coworkers, suppliers, and contractors who may have come in contact with the employee (maintain confidentiality of the employee's identity whenever possible);
  - Maintain a record of all confirmed employee cases and the resulting notification to public health and to those potentially exposed to the employee;
  - Close worksite immediately and follow CDC recommended cleaning and disinfecting in all affected areas.
  - In the case that an employee has a confirmed case of COVID-19, the CDC's cleaning and disinfecting guidelines will be followed:
    - Less than 7 days since the employee has been in the building –
      - Wait 24 hours before cleaning and disinfecting to minimize potential for other employees being exposed to respiratory droplets. If waiting 24 hours is not feasible, wait as long as possible.
      - During this waiting period, open outside doors and windows to increase air circulation in these areas.
    - If it has been 7 days or more since the sick employee used the facility, additional cleaning and disinfection is not necessary. Continue routinely cleaning and disinfecting all high-touch surfaces in the facility.
  - Perform increased routine environmental cleaning and disinfection.

### **Minimizing exposure from customers and community partners.**

Disability Network will post appropriate local, state, or CDC available posters and information in customer accessed areas. Disability Network will implement the following steps, organized in "phases", to minimize exposure from customers and community partners to COVID-19:

#### Phase 1

- Staff will work remotely from home. The office is closed to all staff unless express approval has been given by the Workplace Coordinator.

- Face-to-face meetings with customers in their homes, the community, Disability Network offices or in vehicles is not permitted.
- Staff will not be permitted to attend face-to-face meetings with community partners.
- All meetings with staff, customers, vendors, partners and Community Education activities will be provided using Zoom or other online platforms.

### Phase 2

- Staff will work remotely from home whenever possible. Staff will have limited access to the office to complete tasks or gather supplies. An electronic sign up will be provided to staff in order to schedule time in the office. Staff who are not scheduled will not be allowed in the building.
- Face-to-face meetings with customers in their homes, the community, Disability Network offices or in vehicles is not permitted.
- Staff will not be permitted to attend face-to-face meetings with community partners.
- All meetings with staff, customers, vendors, partners and Community Education activities will be provided using Zoom or other online platforms.

### Phase 3

- **Staff will work remotely from home whenever possible.** Staff will have limited access to the office to complete tasks or gather supplies. An electronic sign up will be provided to staff to schedule time in the office. Staff who are not scheduled will not be allowed in the building. **On Mondays & Wednesdays from 9 am -12 pm, administrative staff will be allowed to access the office. On Tuesdays & Thursdays from 10 am- 2 pm, staff can access the office to meet with customers. All visits to any Disability Network office should be documented on the appropriate calendar no later than 5:00 pm the day before the access will occur.** In the instance that a customer and their support system will be present during face-to-face meetings, all participants must adhere to the following guidelines. No more than 4 total people can participate in any meeting.
- Face-to-face interactions with customers will be allowed:
  - Meetings must be scheduled in advance. Walk-ins will not be allowed.
  - The customer will be asked to assess their health and any known exposure to a person with COVID-19 in advance of the meeting. If the customer is feeling sick, has a temperature or a cough/shortness of breath, that is not the direct result of a pre-existing condition, the meeting will be rescheduled. If the customer reports that in the past two weeks they have been in contact with a person with COVID-19, who has not yet recovered from COVID-19, the meeting will be rescheduled.
  - The customer and staff must both wear a mask while meeting, if no pre-existing conditions contraindicate the use of a mask. The agency will provide a mask to a customer if the customer doesn't have one.
  - There must be 6 foot of space, or more if possible, between the customer and the staff person. If available, the staff and the customer should sit on opposite sides of a barrier, for instance, a Plexiglas divider.

- If Staff meet with a customer or a community partner in a setting that is not one of the 3 Disability Network offices, the meeting must occur outdoors.
- If items or papers are passed back and forth between the customer and the staff, the customer will be asked to wash or sanitize their hands before and after. Staff will follow this same protocol.
- Pens, equipment and other items touched by customers will be disposed of or sanitized before another customer uses them.
- Customers who access services in the Kalamazoo Disability Network office will meet with staff in the Community Building. Customers will have no access to the kitchen area of the community building, including coffee.
- A customer who has a scheduled meeting will be able to access a customer-designated restroom, and will be requested to wash or sanitize their hands before and after using the restroom, and wear a mask if able. Staff will follow the same hand cleaning practices and wearing of a mask when using the staff-designated restroom.
- The two-story Disability Network office building in Kalamazoo will not be open to customers as all customer meetings will occur in the Community Building. Customers will not have access to the computer lab.
- Customers who arrive early for their appointment must wait in their vehicle or remain 6 feet away from other people on the premises.
- Increase cleaning completed by 2 Moms and A Mop personnel of Community Building to ensure the common and high traffic areas are cleaned each day.
- In the event that a customer has a confirmed case of COVID-19 that we know about, the CDC's cleaning and disinfecting guidelines will be followed:
  - Less than 7 days since the customer has been in the building –
    - Wait 24 hours before cleaning and disinfecting to minimize potential for other employees being exposed to respiratory droplets. If waiting 24 hours is not feasible, wait as long as possible.
    - During this waiting period, open outside doors and windows to increase air circulation in these areas.
  - If it has been 7 days or more since the sick customer used the facility, additional cleaning and disinfection is not necessary. Continue routinely cleaning and disinfecting all high-touch surfaces in the facility.
- Community Education activities will be provided using Zoom or other online platforms or settings that allow for appropriate social distancing, which will need to be approved by the Advocacy & Community Education Program Manager.

#### Phase 4

- Staff will have full access to their office.
- Staff will be allowed to welcome walk-in visitors, customers and meet with customers in the community.

- Staff will be allowed to attend community meetings with approval.
- Community Education activities will be held in person or via Zoom or other online platforms as needed.

**Minimizing exposure from vendors/visitors and general public.** Disability Network will take the following steps to minimize exposure from vendors/visitors and general public:

- All deliveries will be made through the rear entrance (Kalamazoo office).
- There will be no public meetings of any size until further notice.
- The office will be closed to non-essential visitors until further notice.
- Disability Network will post appropriate local, state, or CDC available posters and information in areas accessed by visitors or the general public.

### **Battle Creek Site –**

Staff who work out of the Battle Creek office will follow the above guidelines when applicable. Specific guidelines meant for the Battle Creek site are as follows:

- Staff will work remotely from home whenever possible.
- Once staff can have face-to-face interactions with customers, these meetings should be held in the Battle Creek office limited to the staff office space or in a community setting that is following social distancing guidelines. Staff must utilize an appropriate barrier between the customer and themselves (a portable Plexiglas barrier will be provided to staff).
- There will be no more than staff member in the Battle Creek office at any time.
- Scheduling should be done through the Conference Calhoun calendar.
- Staff who are not scheduled should not be in the building

### **St. Joseph Site –**

Staff who work out of the St. Joseph office will follow the above guidelines when applicable. Specific guidelines meant for the St. Joseph site are as follows:

- Staff will work remotely from home whenever possible.
- Once staff can have face-to-face interactions with customers, these meetings should be held in a scheduled meeting room at the AAA location or in a community setting that is following social distancing guidelines. Staff must utilize an appropriate barrier between the customer and themselves (a portable Plexiglas barrier will be provided to staff).
- There will be no more than one staff in the St. Joseph office at any one time.
- Scheduling should be done through the Conference Room A calendar
- Staff who are not scheduled should not be in the building.
- AAA rules will be followed by staff that equal or exceed requirements in place by Disability Network for worksite preventative measures.



## Disability Network Southwest Michigan

### Employee Health Assessment

Employee Name: \_\_\_\_\_

Date of self-assessment: \_\_\_\_\_

Time beginning work, if symptom free: \_\_\_\_\_

In the past 24 hours, have you experienced (check all that apply):

- Fever (100.4 or higher)
- New or worsening cough
- Shortness of breath
- Other \_\_\_\_\_

Current Temperature in degrees Fahrenheit (if using a personal thermometer, please see instructions about taking temperature orally or under the arm as a degree may need to be added to the reading): \_\_\_\_\_

Have you been exposed to anyone with suspected or confirmed case of COVID-19 in the past 14 days?

- Yes
- No

Please turn this health assessment in to the Resource Development & Operations Director's mailbox.

Link to Microsoft form: [Employee Health Assessment - Microsoft Office Form](#)

(Updated 10.29.20)



## Disability Network Southwest Michigan

### Customer/Visitor Health Assessment

Customer/Visitor Name: \_\_\_\_\_

Date of self-assessment: \_\_\_\_\_

In the past 24 hours, have you experienced (check all that apply):

- Fever (100.4 or higher)
- New or worsening cough
- Shortness of breath
- Other \_\_\_\_\_