

[MEDIUM RISK EMPLOYER’S] COVID-19 Preparedness and Response Plan

In accordance with Executive Order 2020-59, Northern Michigan University (Temaki/Smoothie King) institutes this COVID-19 Preparedness and Response Plan (“Plan”).

Company aims to protect its workforce by enacting all appropriate prevention efforts. Company is continually monitoring guidance from local, state, and federal health officials and implementing workplace and Plan modifications where appropriate.

Employees with questions are encouraged to contact Human Resources via phone at 906-227-2470 and/or email at: hr@nmu.edu

1. Prevention Efforts and Workplace Controls

a. Cleanliness and Social Distancing

Employees who are able to perform their essential duties remotely may be permitted to work from home in accordance with approved telework arrangements.

Only critical infrastructure workers performing necessary work are directed to report on-site. For such workers, Company abides by the recommended social distancing and other safety measures and establishes the following:

- Large gatherings are minimized whenever possible; staff meetings are postponed, cancelled or held remotely;
- Employees are encouraged to maintain physical distancing (6 feet) even when on break (), as well as before and after working hours;
- Employees are required to maintain physical distance when reporting to work, clocking in, leaving work, and clocking out;
- Employees’ workstations are no fewer than six feet apart and are marked with tape on the floor for visual reminders. Six feet is maintained as much as possible, acknowledging there are times when employees will be within six feet when going from one workstation to fulfill a customer’s need/order/request.
- Company may utilize flexible work hours, wherever possible, to limit the number of employees simultaneously working on-site;
- Employees’ interactions with the general public are modified to allow for additional physical space between parties; this is accomplished using Plexiglas at the drive thru window to prevent risk of air droplets coming in contact with the employee, credit card reader is placed on an extended pole to avoid customer interaction, orders are brought out to cart in a designated area outside, placed and the customer drives up and picks up his order, thus avoiding any physical interaction with the customer and maintaining six feet distance. Also, all employees when dealing with customers wearing masks and disposable gloves (which they change after each customer).
- Non-essential travel is postponed or cancelled.
- Company provides employees with, at a minimum, non-medical grade face coverings along with a coffee filter they can add to their mask. Training on how to wear and wash masks will be provided to ensure employees are properly wearing and washing their masks after

each shift. In addition, we have disposable masks available if a mask is forgotten at home or should become contaminated at work to use for the remainder of their shift.

- Vendors are expected to follow handwashing and/or hand sanitizer protocol, wearing disposable gloves when in facility, six feet distancing, face covering, not coming into facility if sick and following their employee's protocol for COVID-19 related guidelines.

In addition, Temaki/Smoothie King is instituting the following cleanliness measures:

- Where possible, increasing ventilation rates and circulation throughout work sites;
- Performing and assigning an employee to do routine environmental cleaning and disinfection, especially of common areas per Temaki/Smoothie King cleaning checklist and proper disinfecting and wash/rinse/sanitize guidelines.
- Hand sanitizer in high-traffic areas are provided in multiple areas at Temaki/Smoothie King to include but not limited to: drive thru window area, employee entrance, break area, time clock, and work stations.

Employees are expected to minimize COVID-19 exposure by:

- Cleaning work stations at the beginning and end of each shift per guidelines highlighting: **“how to disinfect, wash, rinse and sanitize”, “How to Disinfect”, and “How to wash, rinse, and sanitize food contact surfaces” and also documenting this in “Temaki/Smoothie King disinfecting log”**
- Avoiding, when possible, the use of other employees' phones, desks, offices, or other work tools and equipment;
- Frequently washing hands with soap and water for at least 20 seconds per CDC handwashing guidelines.
- Utilizing hand sanitizer when soap and water are unavailable;
- Avoiding touching their faces with unwashed hands **per CDC guidelines highlighting how to avoid exposure.**
- Avoiding handshakes or other physical contact;
- Avoiding close contact with sick people **per CDC signs/symptoms of COVID-19 per that are posted throughout Temaki/Smoothie King.**
- Practicing respiratory etiquette, including covering coughs and sneezes **per CDC proper sneezing/coughing technique that are posted throughout Temaki/Smoothie King.**
- Immediately reporting unsafe or unsanitary conditions on Company premises to NMU HR (227-2470);
- Complying with Temaki/Smoothie King daily screening processes. Employees will be educated and provided reminder card on signs/symptoms and guidelines that stipulate when to call in and not report to work. Note, signing the screening tool is to verify your meeting all the guidelines to safety report to work, we don't want you coming to work to verify you can't report to work.
- Seeking medical attention and/or following medical advice if experiencing COVID-19 symptoms; and
- Complying with self-isolation or quarantine orders.

b. Supplemental Measures Upon Notification of Employee's COVID-19 Diagnosis and/or Symptoms

An employee with a COVID-19 diagnosis or who displays symptoms consistent with COVID-19 must be immediately removed from the worksite.

In response to a confirmed diagnosis or display of COVID-19 symptoms, Company:

- Informs all employees with and near whom the diagnosed/symptomatic employee worked of a potential exposure;
- Keeps confidential the identity of the diagnosed/symptomatic employee; and
- Conducts deep cleaning of the diagnosed/symptomatic employee's workstation, as well as those common areas potentially infected by the employee. Temaki/Smoothie King would be closed immediately and deep cleaning (consistent with the CDC guidelines).

All employees who worked in sustained, close proximity to the diagnosed/symptomatic employee are also removed from the worksite for at least 14 days; however, should these exposed employees later develop COVID-19 symptoms and/or receive a confirmed diagnosis, they may not report on-site until all return-to-work requirements are met, defined below.

Company completes an OSHA Form 300, as well as a Form 301, "if it is more likely than not that a factor or exposure in the workplace caused or contributed to the illness." If an employee infects a coworker, the coworker has suffered a work-related illness if one of the recording criteria (e.g., medical treatment or days away from work) is met.

c. Worker Exposure Classification

Employees' "worker exposure" is classified as medium risk by the Occupational Safety and Health Administration's guidance because they frequently and/or closely interact with the general public.

Given this classification, Company provides the following controls in addition to the above-summarized prevention efforts: installing physical barriers where feasible (utilizing only the drive thru window with Plexiglas covering the window opening with only small gap at the bottom to allow for credit card reader to be extended to the customer. Orders are brought out to a designated cart placed outside where the food item(s) are placed and the customer can then drive up to pick up their order, all employees wear face masks disposable gloves and change gloves, wash hands properly and/or hand sanitizer after each customer, thus limiting exposure to the general public, and minimizing face-to-face contact.

2. Identification and Isolation of Sick and/or Exposed Employees

Risk and exposure determinations are made without regard to employees' protected characteristics, as defined by local, state, and federal law.

Any health-related information and documentation gathered from employees is maintained confidentially and in compliance with state and federal law. Specifically, medical documentation is stored separate from employees' personnel documentation.

a. Employees' Self-Monitoring

The following employees should **not** report to work and, upon notification to Company, will be removed from the regular work schedule:

- Employees who display COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting, whether or not accompanied by a formal COVID-19 diagnosis;
- Employees who, in the last 14 days, have had close contact with and/or live with any person having a confirmed COVID-19 diagnosis; and
- Employees who, in the last 14 days, have had close contact with and/or live with any person displaying COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting.

Such employees may only resume in-person work upon meeting all return-to-work requirements, defined below.

b. Daily Screenings

To prevent the spread of COVID-19 and reduce the potential risk of exposure, Temaki/Smoothie King screens employees on a daily basis.

Employees are asked the following questions before entering the worksite:

1. Are you currently suffering from any of the following symptoms – fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting?
 - a. If a touchless thermometer is available, temperature checks are performed.
 - b. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until employee is permitted to return to work as defined below.
2. Have you lived with, or had close contact with, someone in the last 14 days diagnosed with or displaying the symptoms of COVID-19?
 - a. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until at least 14 days after the close contact.
3. Have you travelled via airplane internationally or domestically in the last 14 days?
 - a. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until at least 14 days after the international or domestic travel.

Employees who develop symptoms during their shift must immediately tell their supervisor and go home.

c. Return-to-Work Requirements

Employees who were themselves diagnosed with COVID-19 may only return to work upon confirmation of the cessation of symptoms and contagiousness, proof of which may be acquired via the test-based strategy or the non-test-based strategy.

The test-based strategy is preferred but relies upon the availability of testing supplies and laboratory capacity. Under this strategy, employees may discontinue isolation and return to work upon achieving the following conditions:

- Resolution of fever without the use of fever-reducing medications;
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); **and**
- Negative results of an FDA Emergency Use Authorized molecular assay for COVID-19 from two consecutive nasopharyngeal swab specimens collected at least 24 hours apart.

Under the non-test-based strategy, employees may discontinue isolation and return to work upon achieving the following conditions:

- At least 3 days (72 hours) have passed since recovery defined as resolution of fever without the use of fever-reducing medications;
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); **and**
- At least 7 days have passed since symptoms first appeared.
- Must get Doctors Note stating they are cleared to return to work.

Employees who came into close contact with, or live with, an individual with a confirmed diagnosis or symptoms may return to work after either 14 days have passed since the last close contact with the diagnosed/symptomatic individual, or the diagnosed/symptomatic individual receives a negative COVID-19 test.

Employees are required to submit a release to return to work from a healthcare provider.

3. Workplace Flexibilities and Potential Benefits for Employees Affected by COVID-19

Northern Michigan University is temporarily suspending the assessment of all attendance points for eligible absences.

In addition, employees may be eligible for paid and unpaid leaves of absence.

Employees may be permitted to utilize available paid-time off provided under Company policy concurrently with or to supplement any approved leave.

a. FFCRA

Employees may qualify for two different types of paid leave under the Families First Coronavirus Response Act (“FFCRA”).

Under the Emergency Paid Sick Leave Act (“EPSLA”), employees may seek up to two weeks (i.e., 10 business days) of paid leave for the following reasons:

1. Subject to a Federal, State, or local quarantine or isolation order related to COVID-19;
2. Advised to self-quarantine due to concerns related to COVID-19;
3. Experiencing symptoms of COVID-19 and seeking a medical diagnosis;
4. Caring for an individual subject to a quarantine or isolation order or advised to self-quarantine due to concerns related to COVID-19;
5. Caring for a son or daughter whose school or childcare provider is closed or unavailable due to COVID-19 precautions; and
6. Experiencing any other substantially similar condition specified by the Secretary of Health and Human Services, in consultation with the Secretary of the Treasury and the Secretary of Labor. (Please note, the Secretary of Health and Human Services has not defined conditions which trigger this subpart under the EPSLA.)

For full-time employees, two weeks of leave equates to 80 hours; for part-time employees, two weeks of leave equates to a number of hours equivalent to the number of hours usually worked in a two-week period.

Paid leave for reasons 1, 2, and 3, above, is paid at the employee's regular rate of pay, capped at \$511/day. Paid leave for reasons 4, 5, and 6, above, is paid at a rate equivalent to two-thirds of an employee's regular rate of pay or minimum wage, whichever is greater, capped at \$200/day.

Under the Emergency Family and Medical Leave Expansion Act, employees may seek up to twelve weeks of leave to care for a son or daughter whose school or childcare provider is closed or unavailable due to COVID-19 precautions. The first two weeks of leave, which run concurrently with the EPSLA leave, may be unpaid; the remaining ten weeks of leave are paid at a rate equivalent to two-thirds of an employee's regular rate of pay or minimum wage, whichever is greater, capped at \$200/day.

Employees are to contact Human Resources Benefits Assistant to discuss potential eligibility under the Act

Executive Order 2020-36

Employees who require leave beyond the EPSLA because of their own COVID-19 diagnosis/symptoms, or because they have had close contact or live with an individual with a COVID-19 diagnosis/symptoms, may be eligible for unpaid leave under Executive Order 2020-36 until permitted thereunder to return to work.

b. Unemployment Compensation Benefits

Under Executive Order 2020-57, and the federal CARES Act, unemployment compensation benefits are expanded in terms of eligibility, amount, and duration.

Employees who are unable to report to work for reasons related to COVID-19 are referred to Human Resources for information on unemployment compensation benefits. Such reasons include the following:

- Being under self-isolation or self-quarantine in response to elevated risk from COVID-19 due to being immunocompromised;

- Displaying at least one of the principal symptoms of COVID-19 (i.e., fever, atypical cough, atypical shortness of breath);
- Having close contact in the last 14 days with a confirmed COVID-19 diagnosis;
- Needing to care for someone with a confirmed COVID-19 diagnosis; and
- Fulfilling a family care responsibility as a result of a government directive (e.g., caring for a child whose school or childcare provider is closed or otherwise unavailable due to COVID-19).

c. FMLA and ADA

Employees may be entitled to unpaid leave under the Family and Medical Leave Act (“FMLA”) if their absence is related to their own serious health condition or that of a family member. COVID-19 may constitute a serious health condition where “complications arise.”

Employees are to contact Human Resources Benefits Assistant at 227-2470 to potential eligibility under the Act

Company is also mindful of its obligations under the Americans with Disabilities Act (“ADA”). Specifically, if an employee requests an accommodation because of a condition that may be complicated by COVID-19 (e.g., cystic fibrosis, emphysema, COPD), then Company engages in the interactive process to provide a reasonable accommodation. This may mean allowing the employee to work remotely (if reasonable) or work an alternative schedule.

Northern has a medical accommodations process for employees with medical conditions that affect their working situation. If you have a medical condition, even if you are already working remotely, work with Human Resources to complete the medical accommodation process. The Human Resources Office can be reached at hr@nmu.edu, 906-227-2330.

4. Plan Updates and Expiration

This Plan responds to the COVID-19 outbreak. As this pandemic progresses, Company will update this Plan and its corresponding processes.

This Plan will expire upon conclusion of its need, as determined by Company and in accordance with guidance from local, state, and federal health officials.