**Community Action Agency South Central Michigan COVID-19 Preparedness and Response Plan -Final**

It is Community Action’s priority to keep our employees healthy and safe, especially in the midst of the COVID-19 pandemic. The agency is focused in protecting our employees by enacting all appropriate prevention efforts and abiding by governmental guidelines when possible as we strive to balance public health concerns with the needs of our program operations. This plan pulls from the Centers of Disease Control and Prevention (CDC) and Occupational Safety and Health Administration (OSHA) guidance, it highlights the responsibilities of managers and employees and the steps Community Action is taking to address COVID-19.

The agency will implement various protocols to ensure your safety, it’s up to you and your co-workers to execute on these protocols daily. By releasing this plan, Community Action hopes to clearly communicate our plans moving forward, highlight workplace protocols in place to protect your safety and establish a level of comfort for all of our employees.

Community Action will continue to monitor guidance from local, state, and federal health officials and implementing workplace and Plan modifications where appropriate.

We understand that every employee’s situation is different and encourage those with specific risks or concerns to reach out to their manager or Human Resources to discuss alternate arrangements, if necessary.

Employees with questions are encouraged to contact Director of Operations at (269) 441-1328 or Human Resources (269) 441-1356 and/or email at [\_riskmanagement@caascm.org](mailto:_riskmanagement@caascm.org).

**Return to Work Action Plan:**

Due to the evolving nature of the COVID-19 pandemic, creating an exact timeline for resuming “normal” operations is not feasible. Community Action will continue to monitor applicable federal, state and local guidance and determine next steps for opening up all program operations.

OSHA has identified risk levels involving employees’ risk of occupational exposure to SARS-CoV-2, the virus that causes COVID-19. The level of risk depends in part on the industry type, need for contact within 6 feet of people known to be, or suspected of being, infected with SARS-CoV-2, or requirement for repeated or extended contact with persons known to be, or suspected of being, infected with SARS-CoV-2. The level of risks are identified as very high to high, medium, or lower (caution) risk.

Community Action has identified our employees’ risk level to be at the medium exposure level which is defined as;

* Medium exposure risk jobs include those that require frequent and/or close contact with (i.e., within 6 feet of) people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients, In areas without ongoing community transmission, workers in this risk group from international locations with widespread COVID-19 transmission. In areas where there is ongoing community (e.g., schools, high-population-density work environments, some high-volume retail settings).

1. **Prevention Efforts and Workplace Controls** 
   1. **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:

* COVID-19 Site Coordinators or designate will be assigned to each of the agency’s locations.
* COVID-19 Site Coordinators or designates will be responsible for:
  + To count number of staff allotted at the location;
  + Ask each individual that enters the location the questions noted in this plan below,
  + Disinfect at the beginning and end of the day commons areas of the location assigned;
  + Provide the personnel protective equipment to those individuals entering and working in at the location as required;
  + Complete the location’s daily check list, which confirms number of employees/clients who entered facility, COVID-19 questions answers, reason if employee was sent home, each employee has the required PPE and confirmation of disinfecting the common areas and email to [\_riskmanagement@caascm.org](mailto:_riskmanagement@caascm.org) at the end of the work day the location’s completed daily checklist.
  + Take employee temperatures when they enter the facility. Temperatures will be taken via employee forehead and/or wrist. If an employee’s temperature result is greater than 100.4 degrees for both the forehead and wrist, the employee will be sent home, begin self-isolation and be instructed to contact their health care provider.
* The Agency will post signs at the entrances of each locations the COVID-19 questions we are asking, a sign stating if individuals are sick they are not allowed to enter the location, a sign stating what Personnel Protective Equipment is required to enter the location, and location’s entrance reporting process.
* Staff meetings will continue to be held virtually through teleconferencing until all social distancing requirements are lifted.
* Large gatherings are minimized whenever possible. As a general guide for the Agency, building occupancy will be at a maximum of 20 employees. Please refer to individual department/program guidelines.
* Employees are not required to wear masks or face shields when working in assigned work area alone, masks or face shields are required if any number of additional employees and/or clients enter into employee’s individual work area.
* Masks are required to be worn when entering the location and in the location’s common areas (i.e. hallways, break areas, copy rooms, etc…);
* Adult clients will be required to wear face masks when entering any of our facilities and agency vehicles.
* Employees and/or individuals entering the locations with medical reasons which prevent them from wearing a masks, face shields will be made available to them during the time they are in the location.
* Each location’s COVID-19 Site Coordinator will designate a point of entrance and exit for employees and clients at assigned location. (except if there is an emergency all exits will be allowed to be used)
* Agency will install Hand Sanitizer Dispensing Units at each location’s entrances/exits for employees, clients and visitors to use.
* Employees are required to wear masks when reporting to work and upon leaving work for the day;
* Employees’ work stations will be no fewer than six feet apart;
* Agency will utilize flexible work hours, wherever possible, to limit the number of employees simultaneously working on-site;
* Staggered and monitored work schedules will be implemented for employees returning to the work site. Rotating schedules will be used until all restrictions are lifted to minimize employee contact.
* Employees’ interactions with the general public are modified to allow for additional physical space between parties; sneeze guards will be installed where needed;
* Non-essential travel is postponed or cancelled.
* Agency will provide employees with, at a minimum, non-medical grade face coverings, and any additional personal protective equipment required as it relates to the employee’s position and job functions.
* No agency and/or employee potlucks.
* Vendor and Contractor guidelines are attached to this plan and will be distributed accordingly.
* Each of the Agency’s Program specific COVID19 guidelines are attached to this plan.

In addition, Community Action is instituting the following cleanliness measures:

* Performing routine environmental cleaning and disinfection, especially of common areas;
* Where available, providing hand sanitizer in high-traffic areas.
* Where appropriate, limit clients and the public’s access to work sites.
* Office Procedures:
  + Deliveries: each facility will set up contactless drop zones for all deliveries, including mail and packages. Manager will assign an employee(s) to assist in processing mail and packages at least three times per week, utilizing gloves. Employees ordering food delivery service will need to instruct drivers to utilize drop off zones for contactless delivery.
  + Visitors: Until further notice, all nonessential visitors are prohibited and any interviews should be conducted virtually (utilize Zoom). 2nd Interviews requiring Classroom Observations are suspended until further notice. All business visitor meetings will be required to be conducted virtually.

Employees are expected to minimize COVID-19 exposure by:

* Employees are responsible to clean own work area of highly touched surfaces (i.e. desk surfaces, office chair, door handles, light switches, telephones, keyboards, etc.), when reporting to work, mid-day, any time after meeting with a client, and at the end of the work shift with available cleaning supplies.
* Employees are to continue to practice good hand cleaning hygiene by washing their hands with soap and water prior to the start of their work shift and throughout their work day.
* Avoiding, when possible, the use of other employees’ phones, desks, offices, or other work tools and equipment;
* Utilizing hand sanitizer when soap and water are unavailable;
* Avoiding touching their faces with unwashed hands;
* Avoiding handshakes or other physical contact;
* Avoiding close contact with sick people;
* Practicing respiratory etiquette, including covering coughs and sneezes;
* Immediately reporting unsafe or unsanitary conditions on Community Action premises;
* Comply with Agency’s daily screening processes;
* Employees are responsible to clean their own cloth masks or face shields; (cloth face masks are machine washable and for face shields, employees will need to follow the recommended cleaning instructions that come with the face shield).
* Employees may open windows when possible to circulate air;
* When using agency vehicles, employees are to use disinfectant wipes (located in the vehicle) to wipe down all hard surfaces used in the vehicle (i.e. steering wheel, seats, door handles, electronic knobs and gear shifter).
* Seeking medical attention and/or following medical advice if experiencing COVID-19 symptoms; and
* If an employee is experiencing any of the COVID-19 symptoms, in addition to vomiting, cold and flu like symptoms employee is to stay home until symptoms subside.
* Comply with agency Attendance Policy’s call-in requirements (2 hours prior to start of scheduled work shift) and if absences result of medical treatment or illness may require a healthcare provider’s statement. Healthcare providers statement will be required if employee is recovering from a communicable disease.
* Staff will be sent home if sick.
* Complying with self-isolation or quarantine orders, as necessary and required.
  1. **Supplemental Measures Upon Notification of Employee’s COVID-19 Diagnosis and/or Symptoms**

Employees who test positive for COVID-19 diagnosis or believe they have been infected will be instructed to follow the advice of a qualified medical professional, deep-cleaning procedures will be implemented in the areas the employee worked and self-isolate. Additionally, employees who have been in close contact with an individual who has tested positive for COVID-19 will be instructed to self-quarantine.

When self-isolating employees should:

* Be immediately removed from the worksite;
* Will be allowed to work remotely from home if necessary;
* Stay away from other people in their home as much as possible, staying in a separate room and using a separate bathroom if available;
* Not allow visitors;
* Wear a face mask if they have to be around people;
* Avoid sharing household items, including drinking cups, eating utensils, towels and bedding;
* Clean high-touch surfaces daily;
* Continue monitoring their symptoms, calling their health care provider if their condition worsens.

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

* 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;
* The Agency will report to the Public Health Department and follow their protocol;
* Section off the work station for a period of 24 hours and then conducts deep cleaning of the diagnosed/symptomatic employee’s workstation, as well as those common areas potentially infected by the employee.

All employees who worked in sustained, close proximity to the diagnosed employee are also removed from the worksite and be allowed to work remotely from home 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 their health care provider releases him/her to return to work.

Community Action will complete an OSHA Form 300, as well as a Form 301, “if it is more likely than 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.

1. **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.

The agency will designate isolation room(s) at each location.

* 1. **Employees’ Self-Monitoring**

The following employees should **not** report to work and, upon notification to Community Action, will be removed from the work sit and will be required to work remotely from home:

* Employees who display COVID-19 symptoms that are atypical of their current health conditions, 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.

**Return-to-Work Requirements**

Employees who are symptomatic or who have tested positive should not return to work until the conditions outlined below are met:

**Employee was symptomatic but was not tested for COVID-19:**

The employee may return to work if:

* They have not had a fever for at least 72 hours and have not used fever-reducing medication during that time;
* Coughs and other symptoms have improved;
* Ten days have passed since they first experienced symptoms;
* If employee incurs three or more consecutive absences a return to work note from a health care provider will be required to return to work.

**Employee was tested for COVID-19:**

The employee may return to work if:

* No longer have a fever;
* Coughs and other symptoms have improved;
* They have received two negative COVID-19 tests in a row;
* Has a release to return to work by a Health Care Provider, in compliance with the Agency’s Attendance Policy;
  1. **Employee who refuse to return to work:**
* Manager/Supervisor will notify Human Resources of the Employee’s refusal to return to work.
* Human Resources will contact employee and go through the following process:
  + Obtain reason(s) why the employee is refusing to return to work;
  + Determine if the reason is protected under Executive Order 2020-36: COVID related protection:
    - Has COVID-19,
    - Has principal symptoms of COVID-19, or
    - Has been in close contact with someone who has been diagnosed with COVID-19
  + Ensure Agency is in compliance with ADA/FMLA/MPMLA/NLRA and OSHA prior to any adverse action is administered towards the employee.
  1. **Daily Screenings**

To prevent the spread of COVID-19 and reduce the potential risk of exposure, Community Action will screen employees on a daily basis.

Employees are asked the following questions when 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?
   1. 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?
   1. 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?
   1. 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 report to their supervisor and/or Human Resources.

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

Community Action will comply with Family First Coronavirus Act, Paid Sick Leave Policies, FMLA, and ADA. 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 Agency policy concurrently with or to supplement any approved leave.

Employees will provide employees the opportunity to work remotely from home (if practical), work staggered work schedules as outlined by their manager and Assistant Director.

Employee Mental Health Considerations: please refer to HelpNet, the agency’s Employee Assistance Program.

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