COVID-19 Preparedness and Response Plan

In accordance with MDHHS AND MIOSHA RULES, CADL aims to protect its workforce by enacting all appropriate prevention efforts and is monitoring guidance from local, state, and federal health officials and implementing workplace and Plan modifications where appropriate.

Prevention Efforts and Workplace Controls

Cleanliness and Social Distancing

Employees who are not fully vaccinated and report on-site will abide by social distancing and other safety measures required by all applicable Executive Orders, MDHHS Orders, local health department orders, and the MIOSHA rules including:

- Unvaccinated Employees are required to maintain at least six feet physical distance from patrons and other employees while at work or working off site even when on break, including when reporting to work, clocking in, leaving work, and clocking out as well as before and after working hours.
- Unvaccinated Employees’ workstations will be no fewer than six feet apart.

CADL will have available for non-vaccinated employees, at a minimum, non-medical grade face masks made of tightly woven cloth or other multi-layer absorbent material that covers an employee’s nose and mouth. Employees who are not fully vaccinated must wear such face masks at all times if it can be medically tolerated – unless the employee is alone in an enclosed office.

In addition, CADL is instituting the following cleanliness measures:

- Where possible, increasing ventilation rates and circulation throughout work sites;
- Performing routine environmental cleaning and disinfection, especially of common areas and;
- Providing cleaning supplies and hand sanitizer to employees and providing time for employees to wash hands frequently

All employees are expected to minimize COVID-19 exposure by:

- Cleaning workstations at the beginning and end of each shift;
- Frequently washing hands with soap and water for at least 20 seconds;
- 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 CADL premises to the Supervisor in Charge;
• Complying with CADL’s daily screening processes by completing the Health Questionnaire;
• Immediately notifying the Supervisor in Charge and either not appearing for work or immediately leaving CADL premises or the work location if experiencing COVID-19 symptoms; and
• Complying with self-isolation or quarantine orders consistent with CDC guidance.

CADL will provide the following training to employees and maintain a record of the training:

- Workplace infection-control practices including information on vaccinations available for COVID-19
- The proper use of personal protective equipment (PPE)
- Steps employees must take to notify CADL of any symptoms or a suspected or confirmed case of COVID-19
- How to report unsafe working conditions

CADL will identity the Supervisor in Charge for COVID-19 related matters at each location and notify employees of the Supervisor in Charge's contact information.

**Supplemental Measures Upon Notification of Employee’s COVID-19 Diagnosis and/or Symptoms**

An employee with a COVID-19 diagnosis or who is not vaccinated and displays symptoms consistent with COVID-19 must immediately notify the Supervisor in Charge and remove themselves from the worksite.

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

- Inform all employees with and near whom the diagnosed/symptomatic employee or patron worked or visited of a potential exposure within 24 hours of it being known to CADL;
- Keep confidential the identity of the diagnosed/symptomatic employee; and
- Conduct a deep cleaning of the diagnosed/symptomatic employee’s workstation, as well as those common areas potentially infected by the employee as detailed in this procedure.

**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.

**Employees’ Self-Monitoring**
The following employees should **not** report to work and, upon notification to CADL, will be removed from the regular work schedule:

- Employees who are not fully vaccinated and who display COVID-19 symptoms, which included at least one of the following (1) fever, (2) uncontrolled cough or (3) an atypical new onset of shortness of breath, or at least two of the following (1) loss of taste or smell, (2) muscle aches, (3) sore throat, (4) severe headache (5) diarrhea, (6) vomiting, (7) abdominal pain, not explained by a known physical condition whether or not accompanied by a formal COVID-19 diagnosis.
- Employees who are not fully vaccinated, or who have not had a diagnosis of COVID-19 within the last three months, and in the last 14 days, have had close contact with any person having a confirmed COVID-19 diagnosis; and
- Employees who are not fully vaccinated, or who have not had a diagnosis of COVID-19 within the last three months, and in the last 14 days, have had close contact with any person displaying COVID-19 symptoms.

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

**Daily Screenings**

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

Employees are asked the following questions before entering the worksite:

1. Are you currently suffering from at least one of the following (1) fever, (2) uncontrolled cough or (3) an atypical new onset of shortness of breath, or at least two of the following (1) loss of taste or smell, (2) muscle aches, (3) sore throat, (4) severe headache (5) diarrhea, (6) vomiting, (7) abdominal pain, not explained by a known physical condition whether or not accompanied by a formal COVID-19 diagnosis.
   
   a. If yes, and you are not fully vaccinated or have not had a diagnosis of COVID-19 within the last three months, access is denied, and employee is advised to self-isolate/self-quarantine at home per the recommended CDC guidelines.

2. Have you had close contact with, someone in the last 14 days diagnosed with or displaying the symptoms of COVID-19?

   a. If yes, and you are not fully vaccinated or have not had a diagnosis of COVID-19 within the last three months, access is denied, and employee is advised to self-isolate/self-quarantine at home, per the recommended CDC guidelines.

CADL will maintain an appropriate record of employee’s vaccination status. Employees who are fully vaccinated are exempt from social distancing and mask requirements and are not required
to isolate or quarantine following an exposure to someone with COVID-19. An employee is considered fully vaccinated against COVID-19/Coronavirus two weeks after their second dose in a two-dose series (such as Pfizer or Moderna vaccines) or two weeks after a single-dose vaccine (such as Johnson & Johnson).

Return-to-Work Requirements

Employees who have been in close contact with someone who has COVID-19 are not required to remain away from work if the employee (1) is fully vaccinated, or (2) has tested positive for COVID-19 within the past three months and recovered (so long as the employee does not develop new symptoms). All other employees who have been in close contact with someone who has been diagnosed with COVID-19 are required to stay away from work for the shorter of (1) 10 days from the date of the last contact with the person who has COVID-19 if no test is performed or (2) 7 days after receiving a negative test result so long as the COVID-19 test occurred at least five days after exposure to the infected individual.

Employees who were themselves diagnosed with COVID-19, consistent with the CDC guidance, must stay away from work so long as:

1). Symptom-based

- At least 24 hours have passed since last fever without the use of fever-reducing medications
- Symptoms are improving and;
- At least 10 days have passed since symptoms first appeared.

2). For persons who have NOT had COVID-19 symptoms but Tested Positive

- At least 10 days have passed since the date of their first positive COVID-19 diagnostic test assuming they have not subsequently developed symptoms since their positive test. If they develop symptoms, then the requirements for return following a symptomatic case must be used.

Workplace Flexibilities and Benefits

Employees are typically required to submit a release to return to work from a healthcare provider; given the current stressors on the healthcare system, CADL may accept written statements from employees confirming all the factors supporting their release.

In addition, employees may be eligible for paid and unpaid leaves of absence under FMLA or otherwise.

Employees may be permitted to utilize available paid time off provided under CADL policy concurrently with or to supplement any approved leave.
No employee will be discharged, disciplined or otherwise retaliated against solely because they have stayed home or left work if they are at particular risk of infecting others with COVID-19.

**Plan Updates and Expiration**

This Plan responds to the COVID-19 outbreak. As this pandemic progresses, CADL will continue to revise this policy consistent with mandates from the State and Local Health Department and MIOSHA.

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