

**Shelby Township COVID-19  
Preparedness and Response Plan**

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**June 10, 2020**

**Introduction**

The novel coronavirus (“COVID-19”) pandemic is a respiratory infection that has spread throughout the United States, including Michigan, bringing thousands of deaths, resulting in tens of thousands of confirmed cases, and deeply disrupting this state’s economy, homes, educational, civic, social, and religious institutions.<sup>1</sup> At this time, there is no known vaccine to treat COVID-19 and Executive Orders issued by the Governor require governmental agencies that remain open for in-person work to develop a COVID-19 preparedness and response plan consistent with recommendations in Guidance on Preparing Workplaces for COVID-19, developed by the Occupational Health and Safety Administration (“OSHA”).<sup>2</sup>

The Department of Labor (“DOL”) and OSHA have stated that it is important to plan now for potential COVID-19 outbreaks in order to reduce the impact of these outbreaks at the workplace. Pursuant to Executive Order 2020-97, the Shelby Township Board has adopted this Preparedness and Response Plan (“Plan”) to promote the health, safety and general welfare of its employees and public offices in order to reduce the impact of COVID-19 infections at the workplace.

This Plan designates **Cathy Anderson** as the Township’s Workplace Coordinator to oversee and implement the policies of this Plan. **Bill Glover** is designated as back-up Workplace Coordinator to oversee and implement the policy of this plan for outdoor cemetery workers and contractors. **John Hendrixon** is designated as back up Workplace Coordinator in the event that Cathy Anderson is absent, sick or otherwise unavailable to oversee and implement the policies of this Plan. **John Hendrixon** may appoint such others as Workplace Coordinator as needed.

**1. Symptoms of COVID-19:**

Employees of the Township should familiarize themselves with the symptoms for COVID-19 for self-monitoring purposes. Any employee experiencing COVID-19 symptoms should immediately inform the Workplace Coordinator and go home. The Centers for Disease Control and Prevention (“CDC”) describes symptoms for COVID-19 to include:

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<sup>1</sup> EO 2020-97.

<sup>2</sup> EO 2020-97. See paragraph 1(a).

- Cough
- Shortness of breath or difficult breathing
- Fever
- Chills
- Muscle Pain
- Sore Throat
- New loss of taste or smell
- Congestion or runny nose
- Headache
- nausea, vomiting, or diarrhea<sup>3</sup>

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<sup>3</sup> <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

## **2. Preventative Measures**

### **Working Remotely**

All employees must work remotely to the extent that they can.

### **Daily screening for workers**

Employees who are sick must stay home. Pursuant to Executive Order 2020-97, any employee or contractor entering the workplace is required to answer a questionnaire covering the symptoms and suspected or confirmed exposure to people with possible COVID-19 contact or infections.

The Workplace Coordinator shall ask or provide a questionnaire to every worker or contractor entering the Township work place the following questions:

1. Are you feeling sick?
2. Are you experiencing any COVID-19 symptoms?
3. In the past 72 hours did you have a fever?
4. Have you been exposed anyone who is a suspected case or confirmed case of COVID-19?

Any employee or contractor entering the Township workplace who answers “yes” to any of these questions shall be sent home and may not return to work until the provisions of Section 4, “Sick Employees Returning to Work” are satisfied.

### **Self-Monitoring**

Employees must monitor themselves and self-report if they are exposed to COVID-19 and/or are experiencing any symptoms. Employees experiencing COVID-19 symptoms shall leave work immediately. Employees shall immediately disclose to the Workplace Coordinator if s/he was exposed to COVID-19. Any employee who knowingly comes in contact with COVID-19 or is experiencing COVID-19 symptoms must inform his/her employer immediately.

### **Social Distancing**

Employees shall comply with social distancing standards defined by the Centers for Disease Control and Prevention (“CDC”). The CDC defines “social distancing” to mean keeping space between yourself and other people outside your home.<sup>4</sup> Employees are required to stay at least **six (6)** feet away from other people and shall not gather in groups where social distancing

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<sup>4</sup> <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html>

standards cannot be satisfied. Ground markings, signs, and barriers will be installed to direct and remind employees as appropriate.

### **Increased Facility Cleaning and Disinfection**

The spread of COVID-19 occurs most frequently between people who are in close proximity to each other (less than 6 feet).<sup>5</sup> The Township shall provide and ensure sufficient hand cleaners, disinfecting supplies and sanitizers. Employees are required to clean and disinfect their workspaces daily. Employees shall clean their work spaces with soap and water if disinfectant cleaners are not available.

In the event of a positive COVID-19 case extra measures shall be taken to clean and disinfect the premises before employees are allowed to return, including disinfection of every surface, especially public area and those surrounding the workspace of the infected employee.

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<sup>5</sup> [https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cleaning-disinfection.html?CDC\\_AA\\_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fprepare%2Fcleaning-disinfection.html](https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cleaning-disinfection.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fprepare%2Fcleaning-disinfection.html)

### **Proper Workplace Hygiene Etiquette**

Employees must wash hands regularly with soap and water for at least 20 seconds and use alcohol-based hand sanitizers when available. Employees should not use co-workers' telephones, workspaces or other personal items unless sanitized. Employees must disinfect their workspaces daily.

### **Classifying Department Risks**

The Township Board shall examine every department and employee's job description according to the worker exposure risk to COVID-19 pursuant to the Occupation Risk Pyramid developed by OSHA:



The Township will provide the appropriate Personal Protection Equipment to employees based on the individual occupational risk.

### **Personal Protection Equipment (“PPE”)**

Employees are encouraged to wear PPE to prevent exposure to contaminated surfaces. PPE includes gloves, protective eyewear, face shields, masks and respirators. PPE will be provided to workers who are at greater risk to exposure. Executive Order 2020-97 states that employees are required to wear masks where the work environment is such that they cannot consistently maintain six (6) feet of separation from other people.

### **Travel**

All employee travel shall be restricted unless that travel is essential to the conducting of Township business. The Township encourages all employees to use PPE while on public transportation while traveling to and from the Township office.

### **3. Suspected or Confirmed COVID-19 Cases.**

***“Suspected COVID-19 Case”*** means an employee who experiences COVID-19 symptoms or was exposed to COVID-19.

- An employee who experiences COVID-19 symptoms or has been exposed to an infected person shall immediately notify the Workplace Coordinator.
- The infected employee’s name shall remain confidential and the Workplace Coordinator shall inform all employees or workers who came in contact with the infected person that they might have been exposed to COVID-19.
- Employees who experience COVID-19 symptoms or become sick must go home immediately.
- The Workplace Coordinator shall ensure the infected employee’s workspace and any other area s/he came in contact with is thoroughly disinfected and cleaned.
- An employee who is a “Suspected of COVID-19 Case” may return to work once the provisions of Section 4 of this Plan are satisfied.

***“Confirmed COVID-19 Cases”*** means an employee who has tested positive for COVID-19.

- Any employee who tests positive for COVID-19 shall inform the Workplace Coordinator immediately and must go home immediately. They shall not return until they are no longer infectious according to CDC guidelines.
- An employee who is a “Confirmed COVID-19 Case” shall immediately disclose the names of other employees or workers s/he came in contact with during the past 14 days to the Workplace Coordinator.
- The infected employee’s name shall remain confidential and the Workplace Coordinator shall inform all employees or workers who came in contact with the infected person that they might have been exposed to COVID-19. The Workplace Coordinator shall notify the public health department of the infection within 24 hours.
- The Workplace Coordinator shall ensure the infected employee’s workspace and any other area s/he came in contact with is thoroughly disinfected and cleaned.

- An employee who is a “Confirmed COVID-19 Case” may return to work once the provisions of Section 4 of this Plan are satisfied.

#### **4. Sick Employees Returning to Work.**

This Plan adopts recommendations from the CDC regarding when an employee may return to work if s/he is a suspected or confirmed case of COVID-19. The CDC has developed two acceptable strategies to help determine when an employee with a suspected or confirmed case of COVID-19 may return to work:<sup>6</sup>

1. Symptom-based Strategy: Employee will be excluded from work until: at least three (3) days or seventy-two (72 hours) have passed since the employee has recovered, defined by resolution of fever without the use of fever reducing medications and improvement in respiratory symptoms such as cough or shortness of breath; and, at least 10 days have passed since symptoms first appeared.<sup>7</sup>

Test-Based Strategy: Employee will be excluded from work until: resolution of fever without the use of fever-reducing medications, and improvement in respiratory symptoms such as cough or shortness of breath; and a Negative result of an FDA Emergency Use Authorized COVID-19 molecular assay for detection of SARS-CoV-2 RNA from at least two consecutive respiratory specimens collected  $\geq 24$  hours apart.<sup>8</sup>

#### **5. Office Criteria.**

The Township office will assign entry and exit points for all employees and visitors and will use visual spacing markers to denote 6 feet of space for those waiting in line.

Face coverings shall be worn by everyone in public areas; so long as they can be medically tolerated.

- Social gatherings in public areas are prohibited.
- Signs regarding proper personal hygiene shall be posted.
- Employees shall be notified if the Township discovers any visitors have tested positive for COVID-19.
- No drinking fountain shall be used.
- External doors shall remain locked.

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<sup>6</sup> <https://www.cdc.gov/coronavirus/2019-ncov/hcp/return-to-work.html>

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*



- Drop box use for payment receiving is mandatory.
- Internal customer visits (including contractors) must participate in answering health questions and signing in through an employee designated entrance.
- If appointments are made or deemed necessary, confirm health status with customer/client ahead of time. Use of face masks and hand sanitizer is required when meeting with the public.

## **6. Outdoor Workers**

The following precautions shall apply to all employees working outside of the Township office:

- All gatherings where social distance measures of 6 feet cannot be observed are prohibited.
- In person interaction between employees and the public must be limited, and are not allowed when social distancing cannot be observed.
- Township provided PPE will be used by all employees, such as gloves, goggles, and face coverings appropriate for the activity being performed.
- Tools and equipment shall be thoroughly disinfected after each use and daily/routine cleaning of company vehicle is required
- NO on-site visits to customers without first determining health concerns within the customer's household. Ask health questions!!
- Each person is to travel to job sites/task individually in their own company vehicle.
- Maintain PPE in each company vehicle.
- Alternating of tasks on a daily routine. For example: opening mail or taking well reads.
- Daily checks of lift stations for clogging materials like "flushable wipes". We need to ensure that the pumps keep running.

## **7. Families First Coronavirus Response Act (“FFCRA”): Employee Paid Leave Rights.**

The FFCRA requires the Township to provide employees with paid sick leave or expanded family and medical leave for certain reasons related to COVID-19.<sup>9</sup> Employees are entitled to the following benefits provided by the FFCRA:

- *Two weeks (up to 80 hours) of **paid sick leave** at the employee’s regular rate of pay where the employee is unable to work because the employee is quarantined (pursuant to Federal, State, or local government order or advice of a health care provider), and/or experiencing COVID-19 symptoms and seeking a medical diagnosis; or*
- *Two weeks (up to 80 hours) of **paid sick leave** at two-thirds the employee’s regular rate of pay because the employee is unable to work because of a bona fide need to care for an individual subject to quarantine (pursuant to Federal, State, or local government order or advice of a health care provider), or to care for a child (under 18 years of age) whose school or child care provider is closed or unavailable for reasons related to COVID-19, and/or the employee is experiencing a substantially similar condition as specified by the Secretary of Health and Human Services, in consultation with the Secretaries of the Treasury and Labor; and*
- *Up to an additional 10 weeks of **paid expanded family and medical leave** at two-thirds the employee’s regular rate of pay where an employee, who has been employed for at least 30 calendar days, is unable to work due to a bona fide need for leave to care for a child whose school or child care provider is closed or unavailable for reasons related to COVID-19.”<sup>10</sup>*

An employee may choose to substitute any accrued vacation leave, personal leave or medical/sick leave for the first two weeks of partial paid leave.<sup>11</sup> Although notice of leave is not required, employees are encouraged to inform the Workplace Coordinator if leave is foreseeable.

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<sup>9</sup> <https://www.dol.gov/agencies/whd/pandemic/ffcra-employee-paid-leave>

<sup>10</sup> *Id.*

<sup>11</sup> *Id.* See also, FFCRA, Section 110. Public Health Emergency Leave, sub-section (b)(1)(B).

## A. Qualified Reasons for Leave.

The FFCRA provides the following qualifying reasons for leave:

1. Is subject to a Federal, State, or local quarantine or isolation order related to COVID-19;
2. Has been advised by a health care provider to self-quarantine related to COVID-19;
3. Is experiencing COVID-19 symptoms and is seeking a medical diagnosis;
4. Is caring for an individual subject to an order described in (1) or self-quarantine as described in (2);
5. Is caring for a child whose school or place of care is closed (or child care provider is unavailable) for reasons related to COVID-19; or
6. Is experiencing any other substantially-similar condition specified by the Secretary of Health and Human Services, in consultation with the Secretaries of Labor and Treasury.<sup>12</sup>

## B. Duration of Leave.

**For reasons (1)-(4) and (6):** A full-time employee is eligible for 80 hours of leave, and a part-time employee is eligible for the number of hours of leave that the employee works on average over a two-week period.<sup>13</sup>

**For reason (5):** A full-time employee is eligible for up to 12 weeks of leave (two weeks of paid sick leave followed by up to 10 weeks of paid expanded family & medical leave) at 40 hours a week, and a part-time employee is eligible for leave for the number of hours that the employee is normally scheduled to work over that period.<sup>14</sup>

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<sup>12</sup> <https://www.dol.gov/agencies/whd/pandemic/ffcra-employee-paid-leave#>; see also, FFCRA Section 5102(a)-(6).

<sup>13</sup> *Id.* See also, FFCRA Section 5102(b) Duration of Sick Paid Sick Time, sub-paragraphs (2)(A) and (B).

<sup>14</sup> *Id.*

### C. Calculation of Pay.

**For leave reasons (1), (2), or (3):** employees taking leave are entitled to pay at either their regular rate or the applicable minimum wage, whichever is higher, up to \$511 per day and \$5,110 in the aggregate (over a 2-week period).<sup>21</sup>

**For leave reasons (4) or (6):** employees taking leave are entitled to pay at 2/3 their regular rate or 2/3 the applicable minimum wage, whichever is higher, up to \$200 per day and \$2,000 in the aggregate (over a 2-week period).<sup>22</sup>

**For leave reason (5):** employees taking leave are entitled to pay at 2/3 their regular rate or 2/3 the applicable minimum wage, whichever is higher, up to \$200 per day and \$12,000 in the aggregate (over a 12-week period).<sup>23</sup>

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<sup>21</sup> *Id.*

<sup>22</sup> *Id.*

<sup>23</sup> *Id.*