

COVID-19 PREPAREDNESS AND RESPONSE PLAN

Executive Approval Pending

11.10.20



INTRODUCTION

Dwelling Place of Grand Rapids takes the health and safety of our employees seriously. In the midst of the COVID-19 pandemic, an essential need exists for certain employees to continue working on site. These are employees defined as critical infrastructure workers or employees needed to maintain minimum basic operations. Dwelling Place is committed to reducing the risk of exposure to COVID-19 in the workplace and to providing healthy and safe workplaces for our employees and those who we serve.

This Plan is based on guidance received from the CDC, OSHA and the State of Michigan available at the time of its development. The Plan is subject to change, subject to further information and guidance provided through the CDC, OSHA, the State of Michigan and other health- and work-related governmental actions and advisories. This Plan may also be amended based on operational needs.

Dwelling Place has identified the following potential sources to spread COVID-19 in the workplace:

- The general public
- Customers/clients/residents
- Co-workers/Board Members
- Vendors/visitors

Our employees fall into one or more of the following categories:

- 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 (Staff exposed to known or suspected COVID-19 infected residents, commercial tenants, visitors, and others in properties owned or managed by Dwelling Place, or residents suspected of having COVID-19 at the time of their death).

Employees considered to be at higher risk because they possess one or more physical characteristics identified by the CDC as placing them at higher risk (i.e. age, high blood pressure, diabetes) may request special accommodations to lower their risk for exposure.

COVID-19 WORKPLACE COORDINATOR

Dwelling Place has designated the following individuals as COVID-19 Workplace Coordinators: Dennis Sturtevant, Justin Rhodes, and Kim Cross. The Coordinators are responsible for taking reasonable steps to remain informed of federal, state, and local guidance related to COVID-19 workplace health and safety protocol for potential incorporation into this workplace plan. The Coordinators are also responsible for reviewing human resources policies and practices for consistency and alignment with federal, state, and local requirements.

COORDINATOR CONTACT INFORMATION

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RESPONSIBILITIES OF SUPERVISORS AND MANAGERS

All managers and supervisors must be familiar with this Plan to answer questions from employees. Managers and supervisors are responsible to ensure employee adherence to this plan. Managers and supervisors should practice good personal hygiene and jobsite safety practices to prevent the spread of the virus and encourage this same behavior from all employees.

WORK-SITE SUPERVISORS

One or more employees will be designated to be worksite supervisors to implement, monitor, and report on the COVID-19 control strategies. The supervisor must remain on-site at all times when employees are present on-site.

RESPONSIBILITIES OF EMPLOYEES

Dwelling Place is asking each employee to assist with prevention efforts while at work. In order to minimize the impact of COVID-19 at all worksites, everyone must follow the protocol outlined in this plan. As set forth below, Dwelling Place has instituted various housekeeping, social distancing, and other best practices at our workplace(s) to minimize exposure to COVID-19 and prevent its spread in the workplace. Dwelling Place will require employees to report immediately to their supervisor and the Human Resources Manager 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 or contact the Human Resources Manager.

The State of Michigan, 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 rub with at least 60% alcohol.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes.
- Avoid close contact with people who are sick.
- 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:

- Fever
- An uncontrolled cough
- New onset of shortness of breath
- Or at least 2 of the following symptoms not explained by a known medical or physical condition: loss of taste or smell, muscle aches, sore throat, severe headaches, diarrhea, vomiting, or abdominal pain

If employees develop symptoms as indicated above, they must not report to work. They should notify their supervisor and the Human Resources Manager immediately, and consult their healthcare provider. Likewise, if employees come into close contact with someone showing these symptoms, they should refrain from interacting and must notify their supervisor and Human Resources Manager immediately and consult their healthcare provider. Dwelling Place will also attempt to identify any other employees who may have had close contact with individuals with COVID-19 symptoms.

“Close contact” is not brief or incidental contact with a person with COVID-19 symptoms. Instead, the CDC defines “close contact” as someone who is within 6 feet of an infected person for a cumulative of 15 minutes or more over a 24-hour period, starting from 2 days before illness onset (or, for asymptomatic patients, 2 days prior to test specimen collection) until the time the patient is isolated. :

WORKSITE PREVENTATIVE MEASURES

MINIMIZING EXPOSURE FROM CO-WORKERS

Dwelling Place will take the following steps to minimize exposure from co-workers to COVID-19:

- Educate employees on protective behaviors that reduce the spread of COVID-19 and provide employees with the necessary tools for these protective behaviors, including:
 - Providing and keeping records that all employees have completed training which covers workplace infection-control practices, the proper use of personal protective equipment, steps the employee must take to notify their Dwelling Place supervisor and/or Human Resources of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19, and how to report unsafe working conditions.
 - Conducting and keeping records of a daily entry self-screening protocol for all employees and contractors who enter the workplace. (A questionnaire covers symptoms, suspected or confirmed exposure to people with possible COVID-19), together with each person reporting their own personal temperature screening.)
 - Posting CDC information, including recommendations on risk factors at home and in the community (post at the administrative and residential offices, public restrooms, elevators, lobbies, etc.)
 - Providing tissues and no-touch disposal receptacles to minimize exposure to infectious secretions.
 - Inform employees and post signs about the the importance of personal 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 upon entry and in multiple locations within the worksite.
 - Discourage handshaking and instead encourage the use of other noncontact methods of greeting.
 - Encourage employees to exercise respiratory etiquette, including covering coughs and sneezes.
 - Avoid other employees’ phones, desks, offices, other work tools and equipment, and other commonly touched surfaces when possible. If necessary, clean and disinfect them before and after use.
 - Avoid sharing food utensils and food with other employees. Wash and store all personally used utensils and food containers.

- Encourage and require social distancing (at least 6 feet from one another through the use of ground markings, signs, and physical barriers) to the greatest extent and appropriateness possible while in the workplace. (Each site shall have and implement a customized office and site specific plan of physical adaptations)
- Encourage employees to minimize ride sharing whether in vehicles or on elevators to ensure adequate ventilation. Instead of elevator, use stairs. When using public transportation, use personal protective equipment and hand sanitizer.
- For employees deemed to be medium or high risk, non-medical grade masks, gloves and other Personal Protection Equipment will be provided and should be used at all times when employees cannot consistently maintain 6 feet of separation from other individuals. Face covering shall be required in shared spaces, including during in-person meetings and in breakrooms, hallways, restrooms, or other common or public areas.
- Protocol for employee social distancing practices
 - Where employees normally work within 6 feet of each other, work options will be provided to maintain appropriate separation.
 - Social gatherings and meetings that do not allow for social distancing or that create unnecessary movement through the office shall be prohibited. In-person meetings shall be limited to those who are essential to the meeting and when social distancing guidelines can be maintained and generally only when the meeting could not otherwise be conducted by phone, video-conferencing, or some other format.
 - Remote work shall be permitted to the fullest extent possible. The number of workers present on site will be restricted to those necessary to maintain organizational operations while remaining compliant with CDC and local Health Department guidelines for work settings. Dwelling Place will use rotating on-site and remote work schedules whenever feasible to remain compliant with social distancing recommendations. Employee schedules for on-site work, remote work, or reduced hours will be communicated to employees in advance and with consultation from supervisors.
 - Product/supply deliveries will be coordinated through single drop off points whenever feasible.
 - Mail and other paperwork received will be date stamped and set aside for 2 days before distribution, unless the information is deemed urgent, in which case, the materials will be handled with gloves.
- Employees may be assessed for risk and will be restricted from the workplace if they display symptoms of COVID-19
 - The Human Resources Manager will implement questionnaires to be completed prior to entry into the workplace based upon State of Michigan guidance
 - Employees with any one of these symptoms (fever, an uncontrolled cough, new onset of shortness of breath, or at least two of the following not explained by a known medical or physical condition: loss of taste or smell, muscle aches, sore throat, severe headache, diarrhea, vomiting, or abdominal pain) will be separated from other individuals and sent home immediately and without discharge, discipline, or other retaliation for leaving work when they are at particular risk of infecting others with COVID-19.
 - Workspaces of any employees sent home will be disinfected.
 - Employees with a known or suspected case of COVID will not be allowed to return to work until the individual is determined to be no longer infectious (according to

the latest guidelines) and are released from any local public health department quarantine or isolation order. Dwelling Place reserves the right to require verification from the employee's healthcare provider, indicating that the employee that they may return.

- Employees will be required to stay home if they are sick or if someone in their home is sick and/or if they have been in close contact with a confirmed or suspected case of COVID-19.
 - Employees who have symptoms of acute respiratory illness are required to stay home and not return to work until they are free of fever (100.4° F (37.8° C) or greater, using an oral thermometer), signs of a fever, and any other symptoms for at least 48 hours without the use of fever-reducing or other symptom-altering medicines.
 - Available paid time off options may be utilized by employees.
 - State and federal guidance for return to work will be followed.
 - Communication and approval from the Human Resources Manager will be necessary prior to return to work after symptoms of COVID-19.
- Protocol to follow if an employee or other work-related party has a confirmed case of COVID-19:
 - While maintaining confidentiality as required by the Americans with Disabilities Act (ADA), co-workers at the worksite, contractors, or suppliers who may have come into contact with the person will receive written notification within 24 hours of a positive test confirmation of COVID-19 that they may have been exposed to a colleague. (Alternatively employee's will be notified if the employer learns that an individual including a customer/resident, supplier, or visitor with a confirmed case of COVID-19 has visited the office).
 - The local health department will be contacted to address workplace exposures.
 - Health reporting/recordkeeping requirements mandated by OSHA, the CDC, the local Health Department or other governmental entities will be followed.
 - Workplace contact tracing and CDC-recommended cleaning and disinfecting in all affected areas will be completed. Such may require a temporary closure of all of part of the worksite to allow for deep cleaning.
 - The employee must remain at home in compliance with federal, state and local requirements for quarantine and without discharge, discipline, or other retaliation when they are at particular risk of infecting others with COVID-19. Employees are allowed to use earned sick, vacation, or personal time for paid time off. In compliance with the recently enacted federal law called the Families First Coronavirus Response Act (FFCRA) employees who qualify may be eligible to receive up to an additional 80 hours of emergency paid sick time. Eligibility for this additional COVID-19-related support is determined in consultation with the Human Resource Manager. If an employee does not have sufficient earned sick, vacation, or personal days accrued to maintain the minimum days required for quarantine, Dwelling Place may allow negative accruals on an interim basis.
 - Communications and approval from the Human Resources Manager will be necessary prior to return to work after potential exposure to COVID-19. The Human Resources Manager will follow local Health Department guidance and/or the Center for Disease Control and Prevention guidelines.
- Routine environmental cleaning and disinfection will be increased.

- Employees are to sanitize their work areas upon arrival, throughout the workday, and immediately before departure.
- Employees are to routinely clean and disinfect all frequently touched surfaces in the workplace, such as workstations, keyboards, copy and postage machines, camera systems, white boards and markers, telephones, intercoms, handrails, and doorknobs.
- Disposable wipes are provided, as available, so that commonly used surfaces such as doorknobs, keyboards, remote controls, desks, other work tools and equipment can be wiped down by employees before and after each use.
- Safety Data Sheets of all disinfectants used on site shall be maintained.
- Work-related travel is restricted to essential business only. Employees are encouraged to follow guidelines for travel as recommended by the CDC.
- HVAC systems in worksite locations will be evaluated to determine their potential to adjust for:
 - Installation of high-efficiency air-filters
 - Increasing ventilation rates
 - Increasing the percentage of outdoor air that circulates into the system
- Workspaces and other protections for employees who are at a higher risk for serious illness due to COVID-19 will be reviewed for reasonable accommodations.
- Absenteeism will be monitored to determine if essential functions can be maintained. Cross training for employees and other options may be considered in the event that excessive absenteeism jeopardizes essential functions.
- Employees will be reminded and encouraged to access the EAC Employee Assistance Program (EAP) resources and/or other community mental health resources as needed.
- Companies that provide contracted services or supplies will be provided with written notification reminding them to communicate with their employees about the importance of staying home if they are sick and following OSHA, CDC, State of Michigan, and local Health Department guidelines.

MINIMIZING EXPOSURE FROM CUSTOMERS/CLIENTS/RESIDENTS

- Essential business practices needed to maintain critical operations will be evaluated periodically to determine emerging needs to consider alternative suppliers, prioritizing customer needs, and/or to consider temporary suspension of some operations.
- Protocols for social distancing practices will be developed including but not limited to the following:
 - Dwelling Place will post and update social distancing and universal precautions information provided from the CDC, OSHA, the State of Michigan, and/or the local Health Department.
 - Dwelling Place may restrict visitors who are not residents/customers with limited exceptions.
 - Physical barriers between employees and customers will be maintained wherever feasible including but not limited to minimizing face-to-face contact by remaining in enclosed offices and restricting business mostly to telephone or video communications.
- Dwelling Place will post and update information on reducing the spread of COVID-19.

- Dwelling Place will make Personal Protective Equipment such as gloves and masks available for employees who may perform medium or high-risk exposure duties.
- Fair Housing: Persons with COVID-19 may be regarded as having a disability, similar to persons with other communicable diseases or those with a documented mental or physical impairment that qualifies as a disability under the Fair Housing Act. Decisions related to the distribution and use of personal protective equipment (PPE) should be made consistent with provisions within the Act. Maintaining fairness and consistency with all residents in the implementation of this plan will limit the risks of discriminatory claims.

MINIMIZING EXPOSURE FROM VISITORS/VENDORS

- Dwelling Place will communicate with business partners about elements of Dwelling Place's COVID-19 Preparedness and Response Plan.
- Dwelling Place will provide all vendors with written notice that their workers must also follow social distancing and CDC guidelines whenever present on Dwelling Place property. Vendor employees who are sick or exhibit COVID-19 symptoms are not allowed on Dwelling Place properties.
- If needed, Dwelling Place will identify alternate supply chains for critical goods and services. Some goods and services may be in higher demand or unavailable.
- Dwelling Place will restrict visitors to the administrative and worksite offices, unless required for execution of essential work.
- Dwelling Place will develop protocol for health screening visitors/vendors, if deemed necessary.

MINIMIZING EXPOSURE FROM THE GENERAL PUBLIC

- Dwelling Place will change business practices if necessary to maintain critical operations including, but not limited to, identifying alternative suppliers, prioritizing existing customers, or suspending some operations that are not considered an essential part of maintaining operations.