

EHS-PR-013

COVID-19 Preparedness and Response Plan



Document Control	
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Date:	6/2/20
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Revision:	B
Revision Date:	10/22/2020

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Purpose

In compliance with Michigan Executive Order 2020-161, and MIOSHA Emergency Rules: Coronavirus Disease 2019, Proos (“Company”) has implemented the following procedures (“Plan”) to manage the risk of spreading infectious disease.

Scope

This procedure will cover Prevention Efforts and Workplace Controls, Identification and Isolation of Sick and/or Exposed Employees, Workplace Flexibilities and Potential Benefits for Employees Affected by COVID-19, and Plan Updates and Expiration.

Responsible Parties

- Human Resources Manager – Responsible for maintaining and updating this procedure.
- Human Resources – Responsible for maintaining recordkeeping of all documents related to COVID-19.
- Proos COVID-19 Safety Coordinators – Responsible for adhering to the responsibilities of the COVID-19 Safety Coordinator.
- All Proos Employees – Responsible for following the procedures.
- All Visitors – Responsible for following the procedures.

Definitions

- N/A

Procedure

Prevention Efforts and Workplace Controls

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.

NOTE: Due to the nature of the business, all Proos employees must be present whenever possible to perform their essential job functions effectively.

For all workers, Company abides by the recommended social distancing and other safety measures and establishes the following:

- Large gatherings are minimized whenever possible;

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- Employees are encouraged to maintain physical distance 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' work stations are no fewer than six feet apart;
- 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; and
- Non-essential travel is postponed or cancelled.

Company provides employees with, at a minimum, non-medical grade face coverings. In addition, Company 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
- Where available, providing hand sanitizer in high-traffic areas.

Employees are expected to minimize COVID-19 exposure by:

- Cleaning work stations at the beginning and end of each shift;
- Adhering to distancing rules by following the floor markings in high-traffic areas;
- 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;
- 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 Company premises;
- Complying with Company's daily screening processes;
- Seeking medical attention and/or following medical advice if experiencing COVID-19 symptoms; and
- Complying with self-isolation or quarantine orders.

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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 by an employee, visitor, or customer, Company:

- Within 24 hours, informs all employees, contractors, and suppliers, 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 and disinfecting 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/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.

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Worker Exposure Classification

Employees' "worker exposure" is classified as shown in the table below. For departments in the "Medium" risk category, masks will be required at all times.

Job Exposure Categorization	
Department	Risk
Assembly	Medium
Electrical	Low
Engineering	Low
Human Resources	Low
Laser	Low
Laser Unload	Medium
Logistics	Low
Paint Line	Medium
Press Brake	Low
Sales	Low
Secondary Ops	Low
Weld	Low

Reporting Unsafe Working Conditions

An employee or employee representative may file a complaint regarding workplace safety and health hazards. Complaints can be filed electronically on the MIOSHA website. You can also call MIOSHA toll-free at 800-TO-MIOSH (800-866-4674) to have a complaint form mailed to you.

Masks

Pursuant to Michigan Executive Order 2020-147, Proos requires all customer and other visitors to wear a face covering that fully covers the nose and mouth. Signs have been posted at all customer and visitor entrances to communicate this requirement.

Pursuant to MIOSHA Emergency Rules: Coronavirus Disease 2019, masks are required in all meeting rooms, shared bathrooms, and in work areas where employees cannot maintain 6' of distance.

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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 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.

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Daily Screenings

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

All on-site staff must undergo mandatory temperature screenings 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?
 - a. 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. Do you have a fever (greater than 100.4°) or symptoms of lower respiratory illness such as cough, shortness of breath, difficulty breathing, or sore throat?
 - a. 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.
3. 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.
4. Have you travelled outside the United States or been in close contact with anyone who has traveled outside of the US within the last 10 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 travel or potential exposure.

Employees who develop symptoms during their shift must immediately report to their supervisor and/or Human Resources.

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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 10 days have passed since symptoms first appeared.

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

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Workplace Flexibilities and Potential Benefits for Employees Affected

Company 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.

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.

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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.

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.

Unemployment Compensation Benefits

Under Executive Order 2020-76, 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).

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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.”

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.

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.

Recordkeeping

Proos will maintain a record of the following for a minimum of 1 year:

- COVID-19 employee training records.
- Screening records for all employees and visitors.
- Records of required notifications stemming from a positive diagnosis.

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COVID-19 Safety Coordinators

The table below shows the safety coordinators for each facility and shift.

COVID-19 Safety Coordinators		
Facility	Shift	Coordinator(s)
2555 Oak Industrial	1st	Jason Vanderklok Carleigh Davis Jeff Schram
	3rd	Logan Allen Joel Zwylghuizen
510 Ball	1st	Kristafer Fox

The responsibilities of the safety coordinators include, but are not limited to:

- Ensuring all visitors and employees complete the health screening before entering the facility.
- Ensuring employees follow social distancing and masking requirements.
- Verifying responsible parties follow disinfecting protocols.
- Enforcing operator compliance with other control strategies outlined in this document.
- Reporting any issues with compliance to Operations Manager and/or Human Resources Manager.

Forms

- N/A

Reference Documents

- Michigan Executive Order 2020-36
- Michigan Executive Order 2020-76
- Michigan Executive Order 2020-147
- Michigan Executive Order 2020-153
- Michigan Executive Order 2020-175

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- MIOSHA Emergency Rules Coronavirus Disease 2019 (10/14/20)