



Tyrone Township COVID-19 Preparedness and Response Plan

Date Implemented: May 28, 2020

COVID-19 Preparedness and Response Plan

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.¹ 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”).²

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 2020-77, the Tyrone Township Board (“Township”) 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.

Executive Order 2020-77 prohibits all in-person government activities except for critical infrastructure workers and workers that are necessary to conduct the minimum basic operations whose in-person presence is strictly necessary as defined by the EO 2020-77.³

This Plan designates Mike Cunningham Township Supervisor as the Township’s **Workplace Coordinator** to oversee and implement the policies of this Plan. Jennifer Eden is designated as back-up workplace coordinator in the event that Mike Cunningham is absent, sick or otherwise unavailable to oversee and implement the policies of this Plan.

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:

- Cough
- Shortness of breath or difficult breathing
- Fever
- Chills
- Muscle Pain
- Sore Throat
- New loss of taste or smell
- nausea, vomiting, or diarrhea⁴

¹ EO 2020-77

² EO 2020-77. See paragraph 11(a).

³ See attachment A, Sections 8 and 9 of EO 2020-77: definitions of critical infrastructure workers.

⁴ <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

Essential Workers

Executive Order 2020-77 requires the Township to restrict the number of workers present on the premises to no more than those strictly necessary to perform in-person work.

The order states that “[no] person or entity shall operate a business or conduct operations that require workers to leave their homes or places of residence except to the extent that those workers are necessary to sustain or protect life, to conduct minimum basic operations, or to perform a resumed activity within the meaning of this order.”⁵ The order distinguishes between two types of essential worker: “critical infrastructure workers” and workers “necessary to conduct minimum basic operations.”

Critical Infrastructure Workers

The Township consists of 9 employees and 3 elected officials who are classified as critical infrastructure workers. The order lists these workers as those in conformance with definitions provided by the Director of the U.S. Cybersecurity and Infrastructure Security Agency.⁶ These workers include public safety, first responders and other community-based government operations and essential functions.⁷

Workers Necessary to Conduct Minimum Basic Operations

The Township consists of 9 employees who are classified as workers necessary “to conduct the minimum basic operations, and whose in-person presence is strictly necessary to allow the business or operation to maintain the value of inventory and equipment, care for animals, ensure security, process transactions (including payroll and employee benefits), or facilitate the ability of other workers to work remotely.”⁸

The Township has identified and informed its critical infrastructure workers or other workers in writing who are necessary to conduct the minimum basic operations of the Township. Only these workers/employees are permitted to work on Township premises or complete their job duties away from their homes. All other employees will work remotely.

2. Preventative Measures

Working Remotely

All employees are encouraged to work remotely to the extent that they can. Non-essential employees are required to work remotely and are not permitted at the Township Offices.

Daily screening for workers

Employees who are sick are required to stay home. The Workplace Coordinator is responsible for measuring an employee’s temperature and observing any COVID-19 symptoms before the employee’s shift begins. Employees who do not have a temperature over 100.4 degrees shall

⁵ Executive Order 2020-77; section 4.

⁶ <https://www.cisa.gov/sites/default/files/publications/CISA-Guidance-on-Essential-Critical-Infrastructure-Workers-1-20-508c.pdf>

⁷ Executive Order 2020-77; section 8.

⁸ Executive Order 2020-77; paragraph 4(b).

monitor themselves for any COVID-19 symptoms.⁹ Pursuant to Executive Order 2020-77, anyone 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 every worker entering Township Offices 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 to anyone who is a suspected case or confirmed case of COVID-19?

Any employee or worker entering a Township Office who answers “yes” 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 he/she 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.¹⁰ Employees are required to stay at least six (6) feet away from other people and shall not gather in groups where social distancing standards cannot be satisfied.

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).¹¹ 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 workspaces with soap and water if disinfectant cleaners are not available.

⁹ “CDC considers a person to have a fever when he or she has a measured temperature of 100.4° F (38° C) or greater, or feels warm to the touch, or gives a history of feeling feverish.” See, <https://www.cdc.gov/quarantine/air/reporting-deaths-illness/definitions-symptoms-reportable-illnesses.html>.

¹⁰ <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html>

¹¹ 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 should wash hands regularly with soap and water for at least 20 seconds and use alcohol-base hand sanitizers when available. Employees should not use co-workers' telephones, workspaces or other personal items. Employees should 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 2020-77 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.

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.
- 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 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 of case COVID-19 may return to work¹²:

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.¹³

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 ≥ 24 hours apart.¹⁴

¹² <https://www.cdc.gov/coronavirus/2019-ncov/hcp/return-to-work.html>

¹³ *Id*

¹⁴ *Id*

5. 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-19.¹⁵ 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.”¹⁶

An employee may choose to substitute any accrued Leave Bank or Paid Time Off for the first two weeks of partial paid leave.¹⁷ Although notice of leave is not required, employees are encouraged to inform the Workplace Coordinator if leave is foreseeable.

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);

¹⁵ <https://www.dol.gov/agencies/whd/pandemic/ffcra-employee-paid-leave>

¹⁶ *Id*

¹⁷ *Id.* See also, FFCRA, Section 110. Public Health Emergency Leave, sub-section (b)(1)(B)

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.¹⁸

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.¹⁹

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.²⁰

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).²¹

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).²²

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).²³

¹⁸ <https://www.dol.gov/agencies/whd/pandemic/ffcra-employee-paid-leave#>; see also, FFCRA Section 5102(a)-(6)

¹⁹ *Id.* See also, FFCRA Section 5102(b) Duration of Sick Paid Sick Time, sub-paragraphs (2)(A) and (B)

²⁰ *Id.*

²¹ *Id.*

²² *Id.*

²³ *Id.*