

COVID-19 Preparedness and Response Plan

[Name of Company]



Prepared by

Date

Table of Contents

Who We Are _____ **4**

Introduction _____ **4**

[Company Name] _____

Preparedness and Response Plan _____ **5**

 1. Responsibilities of Managers and Supervisor _____ **5**

 2. Responsibilities of Employees _____ **6**

 3. Facility Protective Measures _____ **7**

 4. Facility Cleaning and Disinfecting _____ **13**

 5. Facility Ventilation _____ **15**

 6. Facility Exposure Situations _____ **16**

 7. OSHA Recordkeeping _____ **19**

 8. Confidentiality and Privacy _____ **20**

 9. General Questions _____ **20**

Attachment A—SARS-CoV-2 (COVID-19) Company Policy _____ **21**

 1. Purpose _____ **21**

 2. Scope _____ **21**

 3. Policy Elements _____ **21**

Attachment B— [Company Name] _____

SARS-CoV-2 (COVID-19) Sanitation Operating Procedure (SOP) _____ **24**

 1. Purpose _____ **25**

 2. Definitions _____ **25**

 3. Responsible Employees _____ **25**

 4. Employee Training _____ **26**

 5. Hand Hygiene and Other Preventive Measures _____ **26**

 6. Sanitation Procedures for Routine Operations _____ **27**

 7. Sanitation Procedures When an Employee Is Infected _____ **28**

 8. Employee Acknowledgement _____ **29**

Attachment C—COVID-19 Safe Operations Checklist _____ **30**

 1. Government Orders _____ **30**

 2. Health and Safety Risk Assessment _____ **30**

 3. Physical Distancing Actions _____ **30**

 4. Sanitation and Hygiene Measures _____ **32**

 5. Personnel Issues _____ **33**

Attachment D—Visitor Questionnaire and Privacy Notice _____ **36**

Table of Contents (con't)

Attachment E—COVID-19 Toolbox Talk: What is COVID-19? _____ **37**

 1. How is COVID-19 Spread? _____ 37

 2. COVID-19 Prevention and Work Practice Controls _____ 38

Attachment F—Question Template for COVID-19 Positive Employee _____ **39**

 1. Introductory Procedures _____ 39

 2. Sample Script _____ 39

 3. Questions to Determine the Onset of the Infectious Period _____ 39

 4. Questions to Determine Contact with Others During Work Hours _____ 40

 5. Questions to Determine Personal Issues _____ 40

 6. Questions to Determine Work Issues _____ 41

Attachment G—Sample Communication to Employee with Close Contact to Co-worker with a Positive COVID-19 Diagnosis _____ **42**

Attachment H—Sample Notification to Customers or Third Parties _____ **43**

 1. Exposure Risk Assessment _____ 43

 2. Steps We Have Taken _____ 44

Attachment I—Sample Notification to Workforce _____ **45**

 1. Facility Sanitation _____ 45

 2. Continued Attention to Hygiene _____ 45

 3. Potential Exposure _____ 45

Resources _____ **46**

United States Department of Labor Mandated Posters _____ **46**

Worksave BC (Canada) posters _____ **46**

Sample Policy: Emergency Paid Sick Leave Under the Families First Coronavirus Response Act _____ **47**

 1. Eligibility _____ 47

 2. Amount of Paid Sick Leave _____ 48

 3. Increments and Intermittent Use of Leave _____ 48

 4. Rate of Pay _____ 48

 5. Interaction with Other Paid Leave _____ 48

 6. Procedure for Requesting Emergency Paid Sick Leave _____ 49

 7. Carryover _____ 49

 8. Job Protections _____ 49

Sample Policy: FMLA Leave Expansion and Emergency Paid Sick Leave Policy Under the Families First Coronavirus Response Act _____ **50**

 1. Purpose _____ 50

 2. Expanded FMLA Leave _____ 50

WHO WE ARE

About PRINTING United Alliance

PRINTING United Alliance is the new entity borne of the merger between Specialty Graphic Imaging Association (SGIA) and Printing Industries of America (PIA). In a milestone in the printing industry, on May 1, 2020, SGIA and PIA officially combined to create the largest, most comprehensive member-based printing and graphic arts association in the United States.

Members now have unparalleled access to preeminent education, training, workshops, events, research, government and legislative representation, safety and environmental sustainability guidance, as well as resources from the leading media company in the industry – NAPCO Media.

PRINTING United Alliance produces the PRINTING United Expo and Conference, the three most important days in printing. This year, PRINTING United takes place in Atlanta on October 21-23, 2020. This expansive display of printing technologies and supplies, education, programming, and services are showcased to the industry at large, and represents all market segments together under one roof. For more information, visit PRINTINGUnited.com.

Introduction — How to Use this Document

With the coronavirus (COVID-19) outbreak officially declared a pandemic by the World Health Organization (WHO), and the subsequent actions taken by state and municipal governments requiring businesses to implement formal prevention and response plans, this template can be used to develop a site-specific plan. This template is based on guidance from the Centers for Disease Control and Prevention, Equal Employment Opportunity Commission, and the Occupational Safety and Health Administration that has been issued as of May 28, 2020.

The state government and local municipal emergency action orders can have different requirements and this template can be customized to reflect those mandated preventative measures against COVID-19. It is imperative that you know and understand the specific requirements being mandated by your controlling government authority.

Disclaimer

The information published in this COVID-19 Preparedness and Response Plan is only informational and is not to be construed as professional advice, which is only available after individual consultation with a professional. This information is derived from trusted sources and is believed to be the most accurate information at the time of publication. The recommendations in this publication are opinions and best practices that are drawn from public health officials, medical institutions, government and quasi-governmental agencies, and experts in these issues. Due to the constant development of knowledge and information related to the COVID-19 virus, the information in this publication may become inaccurate or obsolete.

[COMPANY NAME]

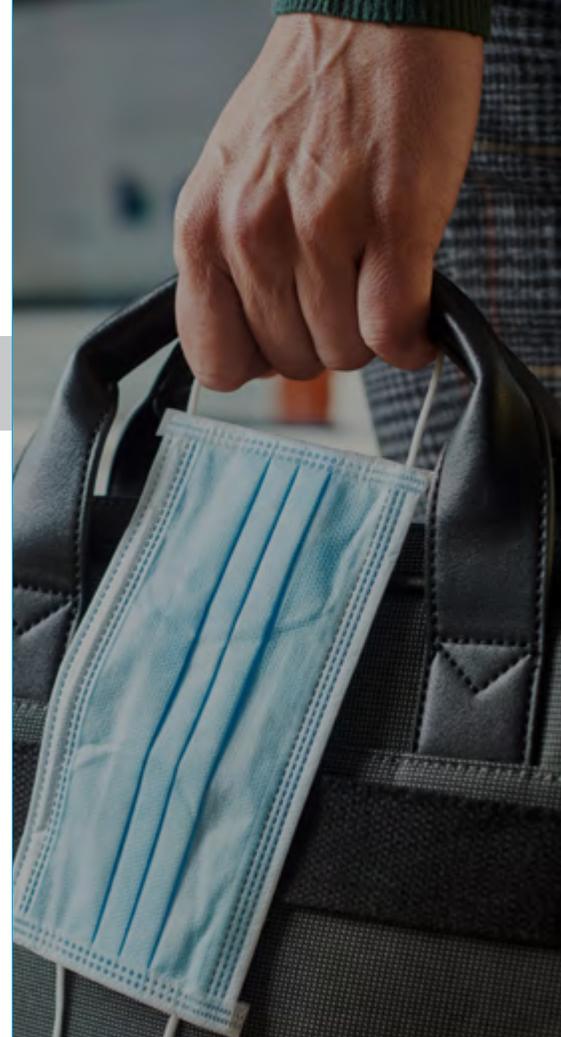
Preparedness and Response Plan

[COMPANY NAME] _____ (hereinafter “Company”) takes the health and safety of our employees very seriously. With the spread of the coronavirus or “COVID-19,” a respiratory disease caused by the SARS-CoV-2 virus, the Company must remain vigilant in mitigating the outbreak. The Company is a proud part of the printing industry, which was deemed “essential” during this Declared National Emergency. To be safe and maintain operations, we have developed this COVID-19 Preparedness and Response Plan to be implemented, to the extent feasible and appropriate, throughout the Company and at all our locations. The Company has also identified a team of employees to monitor the related guidance that the U.S. Centers for Disease Control and Prevention (CDC) and Occupational Safety and Health Administration (OSHA) continue to make available.

This Plan is based on information available from the [CDC](#), [OSHA](#), and [Equal Employment Opportunity Commission \(EEOC\)](#) at the time of its development and is subject to change based on further information provided by the CDC, OSHA, and other public officials. The Company may also amend this Plan based on operational needs.

1. Responsibilities of Managers and Supervisors

All managers and supervisors must be familiar with this Response Plan and be ready to answer questions from employees. Managers and supervisors must always set a good example by following the Response Plan. This involves practicing good personal hygiene and maintaining safety practices to prevent the spread of the virus. Managers and supervisors must encourage this same behavior from all employees.



All managers and supervisors must be familiar with this Response Plan and be ready to answer questions from employees.

2. Responsibilities of Employees

The Company is asking all employees to help with our prevention efforts while at work. To minimize the spread of COVID-19 at our facilities, everyone must play their part. As set forth below, the Company has instituted various housekeeping, social distancing, and other best practices at our company. All employees must follow these as well as those outlined in the attached SARS-CoV-2 (COVID-19) Company Policy, Attachment A. In addition, employees are expected to report to their managers or supervisors if they are experiencing signs or symptoms of COVID-19, as described below. If you have a specific question about this Plan or COVID-19, please ask your manager or supervisor.

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 coughs and sneezes.
- Avoid close contact with people who are sick.

In addition, employees must familiarize themselves with the symptoms of COVID-19, which include, but are not limited to, the following:

- Cough
- Shortness of breath or difficulty breathing
- Fever
- Chills
- Muscle pain
- Sore throat
- New loss of taste or smell
- Early symptoms such as body aches, headache, diarrhea, nausea/vomiting, and runny nose.

If you develop a fever and symptoms of respiratory illness, such as cough or shortness of breath, **DO NOT GO TO WORK** and call your supervisor and healthcare provider right away. Likewise, if you come into close contact with someone showing these symptoms, call your supervisor and healthcare provider right away.



To minimize the spread of COVID-19 at our facilities, everyone must play their part.

3. Facility Protective Measures

The Company has instituted the following protective general measures at all locations. More specific measures can be found in the Sanitation Guide found in Attachment B and the COVID-19 Safe Operations Checklist found in Attachment C.

A. General Safety Policies and Rules

- Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave the workplace and return home.
- Safety meetings will be by telephone, if possible. If safety meetings are conducted in person, attendance will be collected verbally, and the designated person will sign in each attendee. Attendance will not be tracked through passed-around sign-in sheets or mobile devices. Any in-person safety meeting will be limited to groups of no more than 10 people and participants must remain at least six (6) feet apart.
- Employees must avoid physical contact with others and shall direct others (co-workers/contractors/visitors) to increase personal space to at least 6 feet, where possible.
- All in-person meetings will be limited. To the extent possible, meetings will be conducted by telephone.
- Employees will be encouraged to stagger breaks and lunches, if practicable, to reduce the size of any group at any one time to less than 10 people.
- Employees should limit the use of co-workers' tools and equipment. To the extent tools must be shared, the Company will provide sanitizing wipes or other products to clean tools before and after use. When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
- The Company may divide staff into multiple groups, where possible, so that production can continue working effectively if one of the divided teams is required to quarantine.



All in-person meetings will be limited. To the extent possible, meetings will be conducted by telephone.

- As part of the division of staff, the Company will divide employees into dedicated shifts, at which point employees will remain with their dedicated shifts for the remainder of the shift. If there is a legitimate reason for an employee to change shifts, the Company will have sole discretion in making that alteration.
- Employees are encouraged to minimize ride-sharing. While in vehicles, employees must ensure adequate ventilation and wear face coverings.
- If practicable, each employee should operate the same equipment such as pallet jacks, powered pallet jacks, and powered industrial truck (PIT) and/or production equipment every shift.

Please use this space for any Additional Production Facility Safety Precautions. Include: [Additional Precautions that may be appropriate for specific Companies, Business Operations or Projects].

B. Workers Entering Occupied Workplace

Print production and equipment maintenance activities within occupied establishments present unique hazards with regard to COVID-19 exposure. The following steps will be implemented to prevent infections:

- **[If temperature screening is required by the state/ municipality]** All employees will be screened to determine if they have a fever prior to beginning their shift. Once they clock in, they will be directed to the screening area. The screeners are provided with a digital thermometer and the proper personal protective equipment (PPE) that may include gloves, a mask, face shield, and gown or other protective clothing. If an employee has an elevated temperature of 100.4 degrees Fahrenheit or higher, or exhibits the other symptoms, that employee will be sent home and told to contact his or her medical provider.



- Employees must sanitize the work areas upon arrival, throughout the workday, and immediately before departure. The Company will provide sanitizing wipes or other products for this purpose.
- Employees should ask other occupants to keep a personal distance of 6 feet at a minimum. Workers should wash or sanitize hands immediately before starting and after completing the work.

Print production and equipment maintenance activities within occupied establishments present unique hazards with regard to COVID-19 exposure.

C. Facility Visitors

- The number of visitors to the facility will be limited to only those necessary.
- All visitors will be screened in advance of arriving to the facility and documented using the form in Attachment D. If the visitor answers “yes” to any of the following questions, he or she should not be permitted to access the facility:
 - Have you been confirmed positive for COVID-19?
 - Are you currently experiencing, or recently experienced, any symptoms such as cough, fever, shortness of breath or difficulty breathing, chills, repeated shaking with chills, muscle pain, headache, sore throat, new loss of smell or taste, nausea, diarrhea, or vomiting?
 - Have you been in close contact with any person(s) who have tested positive for COVID-19?
 - Have you been in close contact with any person(s) who have traveled and are also exhibiting acute respiratory illness symptoms?
- Deliveries will be permitted but should be properly coordinated in line with our minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles, if possible.

The number of visitors to the facility will be limited to only those necessary.



D. Personal Protective Equipment and Work Practice Controls

- In addition to regular PPE for production workers engaged in various tasks (safety glasses/goggles, gloves, hearing protection, etc.), the Company will also provide:
 - Gloves: Gloves should be worn when working with sanitizing chemicals. The type of glove worn should be appropriate to the task. Employees should avoid sharing gloves.
 - Eye protection: Eye protection should be worn when working with sanitizing chemicals, as required.
 - Respirators and face coverings: The CDC is currently not recommending that healthy people wear N95 respirators to prevent the spread of COVID-19. Nevertheless, employees must wear a face covering when entering the facility, while working — if they come within 6 feet of close contact with co-workers during the day — and leaving the facility at completion of their shifts.
- Clean and sanitize your workstation before your shift and after you complete your day. Wear the designated gloves prior to using the cleaning and sanitizing products and wash your hands after using the materials.
- Disinfect common surfaces following use — microwave handles and buttons, vending machine buttons, refrigerator handles, etc.
- Wash your hands frequently following the 20-second hand-washing rule during the day and after using the toilet, before eating, and if you cough/sneeze into your hands or into a tissue. If unable to easily wash your hands immediately, please use the hand sanitizers located in the facility.
- Follow coughing and sneezing protocols. This requires you to cough and sneeze into a tissue, or, if one is not available, into your elbow. If you use a tissue, discard it into a lined trash can and immediately clean/sanitize your hands.
- Avoid touching your face — particularly eyes, nose, and mouth — with your hands to prevent infection.
- Observe all social distancing measures identified for common areas, lunch/break room, hallways, bathrooms, and work areas.



Employees must wear a face covering when entering the facility, while working — if they come within 6 feet of close contact with co-workers during the day — and leaving the facility at completion of their shifts.

E. Employee Training

Training in a language that is readily understandable by all employees will be provided on the following topics and will be accomplished by using the toolbox talk in Attachment E, verbal communication, handouts, or posters:

- General description of COVID-19, symptoms, when to seek medical attention, how to prevent its spread, and the employer's procedures for preventing its spread at the workplace.
- How an infected person can spread COVID-19 to others even if they are not sick.
- How to prevent the spread of COVID-19 by using cloth face covers, including:
 - CDC guidelines that everyone should use cloth face covers when around other persons.
 - How cloth face covers can help protect persons around the user when combined with physical distancing and frequent hand washing.
 - Information that cloth face covers are not protective equipment and do not protect the person wearing a cloth face cover from COVID-19.
 - Instructions on washing and sanitizing hands before and after using face coverings, which should be washed after each shift.
 - Cough and sneeze etiquette.
 - Washing hands with soap and water for at least 20 seconds, after interacting with other persons and after contacting shared surfaces or objects.
 - Avoiding touching eyes, nose, and mouth with unwashed hands.
 - Avoiding sharing personal items with co-workers (e.g., dishes, cups, utensils, towels).
 - Providing tissues, no-touch disposal trash cans, and hand sanitizer for use by employees.
- Safely using cleaners and disinfectants, which includes:
 - The hazards of the cleaners and disinfectants used at the work site.
 - Wearing PPE (such as gloves)
 - Ensuring cleaners and disinfectants are used in a manner that does not endanger employees.



Training in a language that is readily understandable by all employees will be provided on the following topics and will be accomplished by using the toolbox talk in Attachment E, verbal communication, handouts, or posters.

4. Facility Cleaning and Disinfecting

The Company has instituted regular housekeeping practices, which include cleaning and disinfecting frequently touched surfaces and equipment, and other elements of the work environment, where possible. Employees should regularly do the same in their assigned work areas.

- All offices and break/lunchroom areas will be cleaned at least once per day. Employees performing cleaning will be issued proper PPE, such as nitrile, latex, or vinyl gloves and gowns, as recommended by the CDC.
- All trash collected must be disposed of frequently and properly by someone wearing
- nitrile, latex, or vinyl gloves.
- The Company will ensure that hand sanitizer dispensers are always filled. Frequently touched items (e.g. door pulls and toilet seats) will be disinfected frequently.
- Vehicles, material handling equipment — such as pallet jacks and forklifts, and equipment/tools — should be cleaned at least once per day and before change in operator or rider.
- OSHA has indicated that a reliable report that an employee has tested positive for COVID-19 does not typically require an employer to perform special cleaning or decontamination of work environments, unless those environments are visibly contaminated with blood or other bodily fluids. Notwithstanding this, the Company will clean those areas of the facility that a confirmed-positive individual may have contacted, and it will do so before employees can access that workspace again.
- The Company will ensure that any disinfection shall be conducted using one of the following:
 - Environmental Protection Agency (EPA)-registered disinfectant.
 - Alcohol solution with at least 70% alcohol.
 - Diluted household bleach solutions (if appropriate for the surface).
- The Company will maintain Safety Data Sheets of all disinfectants used on-site.



Vehicles, material handling equipment — such as pallet jacks and forklifts, and equipment/tools — should be cleaned at least once per day and before change in operator or rider.

[Please use this space for Additional Cleaning and Disinfection Guidelines include: Additional Cleaning Requirements that may be Appropriate if Hazardous Materials are Used On-Site].

A large, empty rectangular box with a thin blue border, intended for providing additional cleaning and disinfection guidelines.

5. Facility Ventilation

Some states and local municipalities require facilities to address ventilation aspects of the facility. The information below is drawn from American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE), REHVA, The Federation of European Heating, Ventilation and Air Conditioning, and the National Air Filtration Association (NAFA).

- In buildings with mechanical ventilation systems, extended operation times are recommended.
 - Change the clock times of system timers to start ventilation at nominal speed at least two (2) hours before the building usage time and switch to lower speed two (2) hours after the building usage time. In demand-controlled ventilation systems, change CO2 setpoint to lower, 400 ppm value to assure the operation at nominal speed, or disable it.
 - Keep the ventilation on 24/7 with lowered, but not switched off, ventilation rates when people are absent.
 - Further open minimum outdoor air dampers, as high as 100%, thus eliminating recirculation in the mild weather season. This need not affect thermal comfort or humidity, but clearly becomes more difficult in extreme weather.
 - Improve central air filtration to greater than a MERV-8 with MERV-13 being the best or the highest compatible with the filter rack, and seal edges of the filter to limit bypass. The higher efficiency may increase the filter changing frequency and decrease air flow due to dust and other contaminants.
- Consider portable room air cleaners with HEPA filters.
- The general advice is to supply as much outside air as reasonably possible. The key aspect is the amount of fresh air supplied per person. If, due to smart working utilization, the number of employees is reduced, do not concentrate the remaining employees in smaller areas but maintain or enlarge the social distancing (minimum physical distance 6 feet between persons) among them in order to foster the ventilation cleaning effect.



The general advice is to supply as much outside air as reasonably possible.

- Exhaust ventilation systems of toilets should always be kept on, 24/7, and make sure that under-pressure is created, especially to avoid the fecal-oral transmission.
- In buildings without mechanical ventilation systems, it is recommended to actively use operable windows (much more than normally, even when this causes some thermal discomfort). Window airing then is the only way to boost air exchange rates. Opening windows for 15 minutes or so when entering the room, especially when the room was occupied by others beforehand, will provide additional ventilation. Also, in buildings with mechanical ventilation, window airing can be used to further boost ventilation.
- Do not open windows in toilets with passive stack or mechanical exhaust systems as this may cause a contaminated airflow from the toilet to other rooms. If there is no adequate exhaust ventilation from toilets, and window airing in toilets cannot be avoided, it is important to keep windows open also in other spaces to achieve cross flows throughout the building.

6. Facility Exposure Situations

Employee Exhibits COVID-19 Symptoms

If an employee exhibits COVID-19 symptoms, the employee must remain at home until he or she fulfills all three of the following criteria:

- At least 10 days after onset of symptoms;
- Fever-free for 72 hours (three full days) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants);
- Experiencing an improvement of all COVID-19 symptoms the employee was experiencing.

To the extent practical, employees are required to obtain a doctor's note clearing them to return to work. Notification to company employees should not be made unless the employee has a positive COVID-19 diagnosis.

Notification to company employees should not be made unless the employee has a positive COVID-19 diagnosis.



Employee Tests Positive for COVID-19

An employee who tests positive for COVID-19 will be directed to self-quarantine away from work. Use the Question Template for COVID-19 Positive Employee found in Attachment F to identify people that had contact with the employee during the infectious periods, and areas of the facility where the employee was during the infectious period.

Employees that test positive and are symptom free may return to work when at least seven days have passed since the date of his or her first positive test and have not had a subsequent illness. Employees who test positive and are directed to care for themselves at home may return to work:

- At least 10 days after onset of symptoms;
- When employee has been fever free for 72 hours (three full days) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants);
- When employee is experiencing an improvement of all his or her COVID-19 symptoms.

Employees who test positive and have been hospitalized may return to work when directed to do so by their medical care providers. The Company will require an employee to provide documentation from a medical provider clearing his or her return to work.

Employee Has Close Contact with an Individual Who Has Tested Positive for COVID-19

Employees who have come into close contact with an individual who has tested positive for COVID-19 (co-worker or otherwise) will be directed to self-quarantine for 14 days from the last date of close contact with that individual. Use the Sample Communication to Employee with Close Contact to Co-worker with a Positive COVID-19 Diagnosis found in Attachment G to inform the employees.

Be careful not to reveal the identity of the employee who has tested positive for COVID-19. The company must protect the individual's identity when possible, however, employees may be able to discern the identity on their own. Do not confirm questions or speculation about the identity of the individual.



Use the Question Template for COVID-19 Positive Employee found in Attachment F to identify people that had contact with the employee during the infectious periods, and areas of the facility where the employee was during the infectious period.

Close contact is defined as 6 feet for a prolonged period of time, generally considered to be 30 minutes. However, close contact may also be physically touching infectious fluids of a COVID-19 case. This can include touching a tissue that was used by the person who has tested positive, or a situation where the infected person coughed or sneezed in close proximity to the individual during the infectious period.

If the Company learns that an employee has tested positive, the Company will conduct an investigation to determine co-workers who may have had close contact with the confirmed-positive employee during the infectious period using the Question Template for COVID-19 Positive Employee found in Attachment F.

If applicable, the Company will also notify any sub-contractors, vendors/suppliers, or visitors who may have had close contact with the confirmed-positive employee. Use the completed Visitor Questionnaire and Privacy Notices (Attachment D) that are on file to verify this information. Once verified, use the Sample Notification to Customers or Third Parties in Attachment H to inform the individuals of the contact during the infectious period with the confirmed-positive employee.

If an employee learns that he or she has come into close contact with a confirmed-positive individual outside of the workplace, he/she must alert a manager or supervisor of the close contact and self-quarantine for 14 days from the last date of close contact with that individual.

If applicable, the Company will also notify any sub-contractors, vendors/suppliers, or visitors who may have had close contact with the confirmed-positive employee.



Communication to Employees When Potentially Exposed to Infected Co-Worker

When an employee is confirmed to have contracted COVID-19 and may have exposed others in the facility, the potentially exposed employees will be informed about their possible exposure. These co-workers may not have had close contact with the COVID-19 case, however, informing the co-workers of the employee's positive diagnosis provides notice to monitor their health carefully in case they may develop COVID-19 symptoms. The communication to employees can be found as the Sample Notification to Workforce found in Attachment I.

7. OSHA Recordkeeping

If a confirmed case of COVID-19 is reported, the Company will determine if it meets the criteria for recordability and reportability under OSHA's recordkeeping rule. OSHA requires employers to record work-related injuries and illnesses that meet certain severity criteria on the OSHA 300 Log, as well as complete the OSHA Form 301 (or equivalent) upon the occurrence of these injuries. For purposes of COVID-19, OSHA also requires employers to report to OSHA any work-related illness that: (1) results in a fatality, or (2) results in the in-patient hospitalization of one or more employees. "In-patient" hospitalization is defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment.

OSHA has determined that COVID-19 should not be excluded from coverage of the rule — like the common cold or the seasonal flu — and, thus, considers it an "illness." However, OSHA has stated that only confirmed cases of COVID-19 should be considered an illness under the rule. Thus, if an employee simply comes to work with symptoms consistent with COVID-19 but is not a confirmed diagnosis, the recordability analysis is not necessarily triggered at that time.

If an employee has a confirmed case of COVID-19, the Company will assess any workplace exposures to determine if the case is work-related. Work-relatedness is presumed for illnesses that result from events or exposures in the work environment unless it meets certain exceptions. One of those exceptions is that the illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside of the work environment. Thus, if an employee develops COVID-19 solely from an exposure outside of the work environment, it would not be work-related, and thus not recordable.

If a confirmed case of COVID-19 is reported, the Company will determine if it meets the criteria for recordability and reportability under OSHA's recordkeeping rule.



The Company's assessment will consider the work environment itself, the type of work performed, the risk of person-to-person transmission given the work environment, and other factors such as community spread. Further, if an employee has a confirmed case of COVID-19 that is considered work-related, the Company will report the case to OSHA if it results in a fatality within 30 days or an in-patient hospitalization within 24 hours of the exposure incident.

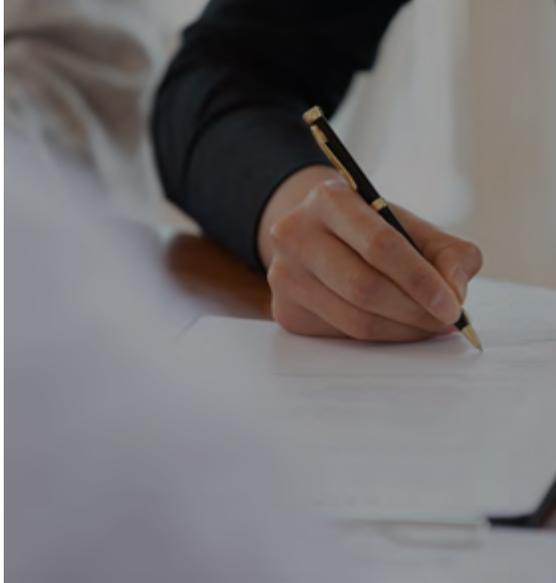
8. Confidentiality and Privacy

Except for circumstances in which the Company is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions will be maintained in accordance with applicable law (including HIPAA regulations) and to the extent practical under the circumstances. When it is required, the number of persons who will be informed that an unnamed employee has tested positive will be kept to the minimum needed to comply with reporting requirements and to limit the potential for transmission to others. The Company reserves the right to inform other employees that an unnamed co-worker has been diagnosed with COVID-19 if the other employees might have been exposed to the disease so the employees may take measures to protect their own health. The Company also reserves the right to inform sub-contractors, vendors/suppliers, or visitors that an unnamed employee has been diagnosed with COVID-19 if they might have been exposed to the disease so those individuals may take measures to protect their own health.

9. General Questions

Given the developing nature of the COVID-19 outbreak, the Company may modify this Response Plan on a case-by-case basis. If you have any questions concerning this Plan, please contact

[Title of Company Contact]



Given the developing nature of the COVID-19 outbreak, the Company may modify this Response Plan on a case-by-case basis.

Attachment A — SARS-CoV-2 (COVID-19) Company Policy

1. Purpose

This company policy includes the measures we are actively taking to mitigate the spread of COVID-19. We want to provide a safe and healthy workplace, and we also have a legal obligation to do so. You are required to follow all of these rules diligently in order to sustain a healthy and safe workplace in this unique environment. We all must respond responsibly to these health precautions. We assure you that we will always treat your private health and personal data with high confidentiality and sensitivity.

This COVID-19 company policy is susceptible to changes with the introduction of additional government guidelines. If changes to this policy are made, we will provide you with an updated copy as well as any new instructions as soon as possible.

Failure to follow the applicable requirements outlined in this policy is subject to our disciplinary policy.

2. Scope

This COVID-19 policy applies to all of our employees who physically work in our facility. Employees who are working remotely are required to read through this action plan as well, to ensure that we collectively and uniformly respond to this challenge.

3. Policy Elements

The required actions identified below must be followed by employees to protect themselves and their co-workers from a potential COVID-19 infection.

When You Should Request Sick Leave

- If you have a fever, dry cough, shortness of breath, chills, repeated shaking with chills, muscle pain, headache, sore throat, new loss of taste or smell, nausea, diarrhea, or vomiting, you must request sick leave or permission to work from home if your work assignment supports a telework option. You will be required to stay away from work until the following circumstances have been achieved:
 - At least 10 days after onset of symptoms;
 - Fever free for 72 hours (three full days) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants);
 - Employee experiences an improvement of all his or her COVID-19 symptoms.
- If you experience a fever, dry cough, shortness of breath, chills, repeated shaking with chills, muscle pain, headache, sore throat, new loss of taste or smell, nausea, diarrhea, or vomiting, or feel poorly while at work, notify your supervisor and make arrangements to leave work immediately. You may request sick leave or permission to work from home if your work assignment supports a telework option. You will be required to stay away from work for 14 calendar days, unless a test confirms you are not infected with COVID-19.
- If you have a positive COVID-19 diagnosis, you can return to the office only after you have fully recovered, with a doctor's note confirming your recovery and that you are no longer infectious.

When You Should Make a Work-from-Home Request

- If you are feeling ill, but are able to work, you can request to work from home. Teleworking requests must be made directly to your supervisor. If your current work assignment supports a telework option, you will be informed by your supervisor.
- If your current work assignment does not support a telework option, you will be expected to fulfill your duties as assigned or [Company needs to complete based on current policy regarding PTO, Families First Coronavirus Response Act (FFCRA), or other leave policy].

If you have recently returned from areas with a high number of COVID-19 cases (based on CDC tracking), we will ask you to work from home for 14 calendar days and return to the office only if you are fully asymptomatic. You will also be asked to follow physical distancing protocols as well as all health and safety rules required upon your return to work.

- If you have been in close contact with someone infected by COVID-19, with high chances of being infected yourself, you must request to work from home for a period of time that is appropriate based on the unique circumstances of the situation. This period of time will be determined with the most current information from your physician, medical expert opinions, and CDC guidelines.
- If you are a parent and need to stay at home with your children, request to work from home. Follow up with your manager to make arrangements and set expectations. If your current work assignment does not support a telework option, [Company] will work with you to arrange leave pursuant to the FFCRA, PTO, and any other applicable leave policy.
- If you need to provide care to a family member infected by COVID-19, request to work from home. You will be permitted to return to the office 14 calendar days after your family member has fully recovered, provided that you're asymptomatic or that you have a doctor's note confirming that you do not have COVID-19. You will also be asked to adhere to physical distancing protocols as well as all health and safety rules required upon your return to work. If your current work assignment does not support a telework option, [Company] will work with you to arrange leave pursuant to the FFCRA, PTO, and any other applicable leave policy.
- If you commute to work by using public transportation and do not have private transportation options available, request to work from home until you are comfortable taking public transportation again or when the COVID-19 virus has been controlled.

Travel and Meeting Rules

- All work trips and events, both domestic and international, are cancelled/postponed until further notice.
- In-person meetings should be conducted virtually whenever possible, including with people outside of [Company]_____.
- If you are planning to travel voluntarily to a high-risk country with increased COVID-19 cases, you will be required to work from home for 14 calendar days upon your return or longer should you develop symptoms outlined in this policy. You will be asked to adhere with physical distancing protocols as well as health and safety rules required upon your return to work.

General Safety and Hygiene Rules

- Put on the designated face coverings prior to entering the facility. The face covering must always be worn when you are interacting with co-workers. If you are working alone and not within 6 feet of your co-workers or working with equipment where the face covering can pose a hazard to yourself or a co-worker, the face covering may be removed. If you have an underlying health problem that prevents you from wearing a face covering, please inform your supervisor.
- When requested, you must report for daily symptom assessments, which may include temperature screening and questions about your health.
- Clean and sanitize your workstation before your shift and after you complete your day. Wear the designated gloves prior to using the cleaning and sanitizing products and wash your hands after using the materials.
- Disinfect common surfaces following use — microwave handles and buttons, vending machine buttons, refrigerator handles, etc.
- Wash your hands frequently following the 20-second hand-washing rule during the day and after using the toilet, before eating, and if you cough/sneeze into your hands or into a tissue. If unable to easily wash your hands immediately, please use the hand sanitizers located in the facility.
- Follow coughing and sneezing protocols. This requires you to cough and sneeze into a tissue, or, if one is not available, into your elbow. If you use a tissue, discard it into a lined trash can and immediately clean/sanitize your hands.
- Avoid touching your face — particularly eyes, nose, and mouth — with your hands to prevent infection.
- Observe all social distancing measures identified for common areas, lunch/break room, hallways, bathrooms, and work areas.
- Observe start time, lunch, and break schedules.
- If you find yourself coughing/sneezing on a regular basis, avoid close physical contact with your co-workers and request sick leave. See a doctor and request a COVID-19 test, remaining home until you receive clearance that you do not have COVID-19.
- If you observe any areas where safety measures can be improved, please report them to your supervisor.

Employee Name

Signature Date

Supervisor Signature Date

Attachment B — [Company Name] _____

SARS-CoV-2 (COVID-19) Sanitation Operating Procedure (SOP)

(Please use this space to outline your Sanitation Operating Procedure)

Date Prepared

Authorized Individual (Name and Title)

1. Purpose

The purpose of this procedure is to provide instructions on the cleaning and disinfection of potentially contaminated work surfaces to prevent the transmission of the coronavirus and possibly other viruses, bacteria, and other infectious agents. The contents of this procedure are based on the recommendations by the CDC.

2. Definitions

Approved Disinfectants refers to the list of EPA-registered disinfectant products that have qualified for use against SARS-CoV-2, the coronavirus that causes COVID-19. Products on EPA’s “List N: Disinfectants for Use Against SARS-CoV-2” are registered disinfectants qualified for use against SARS-CoV-2 approved through EPA’s Emerging Viral Pathogen Program.

Bloodborne Pathogens standard refers to an OSHA standard that sets forth requirements for employers with workers exposed to blood or other potentially infectious materials.

Cleaning refers to the removal of germs, dirt, and impurities from surfaces. Cleaning does not kill germs, but by removing them, it lowers their numbers and the risk of spreading infection.

Disinfecting refers to using chemicals to kill germs on surfaces. This process does not necessarily clean dirty surfaces or remove germs, but by killing germs on a surface after cleaning, it can further lower the risk of spreading infection.

Hazard Communication Standard refers to an OSHA standard that sets requirements for classifying the potential hazards posed by chemicals in the workplace and requiring employee training on recognizing those hazards and how to take appropriate measures to protect themselves from the identified hazards.

OSHA refers to the Occupational Safety and Health Administration.

PPE refers to protective gloves, clothing, helmets, shoes, safety glasses, goggles, or other garments or equipment designed to protect the wearer's body from injury or infection.

Safety Data Sheet refers to OSHA written or printed material concerning a hazardous chemical that is prepared by the manufacturer or the company importing the product describing the physical and chemical properties of the product according to specific guidelines.

3. Responsible Employees

The <Title of Employee> _____ is responsible for the overall activities related to implementing and maintaining the SOP.

The following employees have responsibility for the following activities:

- Employee Training: _____ <Title of Employee>
- Monitoring: _____ <Title of Employee>
- Documentation: _____ <Title of Employee>

4. Employee Training

The <Title of Employee> _____ is responsible for ensuring that all employees are trained in how to properly wash their hands with soap and water for 20 seconds, proper coughing and sneezing etiquette, practicing social distancing, and cleaning and disinfecting their individual workstations. Additional training will be provided to all cleaning staff on-site prior to providing cleaning tasks and will include the instructions on cleaning of other commonly touched worksurfaces, bathrooms, breakrooms, trash pickup, and other activities performed in areas of the facility.

The training topics include the following:

- Instructions on what to do if they develop [symptoms](#) within 14 days after their last possible exposure to the virus. At a minimum, any staff should immediately notify their supervisor and the local health department if they develop symptoms of COVID-19.
- When to use PPE, what PPE is necessary, how to properly don (put on), use, and doff (take off) PPE, and how to properly dispose of PPE.
- Hazards of the cleaning chemicals used in the workplace in accordance with OSHA's Hazard Communication Standard ([29 CFR 1910.1200](#)).
- Compliance with OSHA's Bloodborne Pathogens standard ([29 CFR 1910.1030](#)), including proper disposal of regulated waste and PPE ([29 CFR 1910.132](#)), if contaminated materials are being collected and disposed.

5. Hand Hygiene and Other Preventive Measures

To support a sanitary, healthy, and safe workplace, the following practices have been implemented:

- Sick workers are required stay at home or go home if they start to feel/look ill.
- Each employee is required to wash their hands just prior to eating food, drinking, or using tobacco products, or after going to the bathroom.
- Proper and frequent hand-washing is encouraged by setting up multiple locations and following the guidance at the [clean hands webpage](#).
- Employees have been encouraged to avoid touching eyes, nose, or mouth with unwashed hands.
- Tissues and no-touch disposal receptacles with liners are provided at each workstation or in a common area. Gloves are required when removing garbage bags, handling, and disposing of trash, followed by washing hands after handling or disposing of trash.
- Soap has been provided at all bathrooms and other sinks in the facility. If soap and water are not readily available, alcohol-based hand sanitizer that is at least 60% alcohol has also been provided. If hands are visibly dirty, soap and water should be chosen over hand sanitizer.
- Hand sanitizers have been placed in multiple locations for easy access and to encourage hand hygiene.
- Posters that encourage [hand hygiene](#) to [help stop the spread](#) have been placed at the entrance to the facility and in other workplace areas where they are likely to be seen.

- Handshaking and other forms of personal contact have been prohibited. Employees are encouraged to use other noncontact greeting methods.
- Employees are required to follow [coughing and sneezing etiquette](#).
- Employees are instructed to not use other workers' phones, desks, offices, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.
- Disposable wipes and/or cleaning rags with approved cleaners have been provided at key locations so that commonly used surfaces (e.g., doorknobs, keyboards, remote controls, desks, other work tools and equipment) can be wiped down by employees before each use and when necessary.
- Each employee will clean and disinfect or, if already clean, disinfect their workstation prior to beginning their shift with a focus on frequently touched surfaces. The frequently touched surfaces include worktables, tools, ink knives, tables, chairs, doorknobs, light switches, handles, desks, faucets, sinks, keyboards, printers, telephones, remote controls, copy machine parts, machine control stations, and handrails. The frequently touched surfaces will vary based on the specific workstation.
- Cleaning personnel or designated employee will clean and disinfect or, if already clean, disinfect their workstation and cleaning supply cart prior to beginning their shift. They will also clean and sanitize frequently touched surfaces in common areas such as floors, walls, doors, doorknobs, push plates, handles, worktables, tables, chairs, doorknobs, light switches, handles, desks, telephones, remote controls, faucets, sinks, toilets, bathrooms, soap dispensers, handrails, food preparation, and storage equipment — such as coffee makers, microwaves, refrigerators, and garbage cans — on a regular basis as determined by the need, which should be at least daily, but can be more frequent.
- Shipping and receiving personnel will leave mail and packages undisturbed for 24 hours or sanitize packages and mail in case they need to be opened immediately.

6. Sanitation Procedures for Routine Operations

Wear disposable gloves when cleaning and disinfecting surfaces. Gloves should be discarded after each cleaning. If reusable gloves are used, those gloves should be dedicated for cleaning and disinfection of surfaces for COVID-19 and should not be used for other purposes. Wash hands immediately for 20 seconds after gloves are removed.

Additional PPE might be required based on the cleaning/disinfectant products being used and whether there is a risk of splash.

Cleaning and/or disinfecting shall be accomplished by using household cleaners and EPA-registered disinfectants that are appropriate for the surface. All label instructions for safe and effective use of the cleaning product or disinfectant shall be followed including precautions to take when applying the product, such as wearing gloves and making sure you have good ventilation during use of the product.

When cleaning and disinfecting surfaces and areas, the following procedures will be followed:

- If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection.
- For disinfection, most common EPA-registered household disinfectants should be effective. A list of products that are EPA-approved for use against the virus that causes COVID-19 is [available here](#). Follow the manufacturer's instructions for all cleaning and disinfection products (e.g., concentration, application method, and contact time).
- If EPA-registered household disinfectants are not available, diluted household bleach solutions can be used if appropriate for the surface. Check to ensure the product is not past its expiration date. Never mix household bleach with ammonia or any other cleanser. Unexpired household bleach will be effective against coronaviruses when properly diluted.

Prepare a bleach solution by mixing:

- 5 tablespoons (1/3 cup) bleach per gallon of water, or
- 4 teaspoons bleach per quart of water.

7. Sanitation Procedures When an Employee Is Infected

Wear disposable gloves and a gown when cleaning and disinfecting surfaces. Gloves and gown should be discarded after each cleaning. Wash hands immediately for 20 seconds after gloves are removed.

Additional PPE might be required based on the cleaning/disinfectant products being used and whether there is a risk of splash.

When cleaning and disinfecting surfaces and areas, the following procedures will be followed:

- Close off areas used by the sick person.
- Open outside doors and windows, if possible, or increase air circulation in the area by adjusting the Heating Ventilation and Air Conditioning system. Wait 24 hours before you clean or disinfect. If 24 hours is not feasible, wait as long as possible.
- Clean and disinfect all areas used by the sick person, such as offices, bathrooms, common areas, shared electronic equipment like tablets, touch screens, keyboards, and remote controls.
- If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection.
- For disinfection, most common EPA-registered household disinfectants should be effective. A list of products that are EPA-approved for use against the virus that causes COVID-19 is [available here](#). Follow the manufacturer's instructions for all cleaning and disinfection products (e.g., concentration, application method, and contact time).
- If EPA-registered household disinfectants are not available, diluted household bleach solutions can be used if appropriate for the surface. Check to ensure the product is not past its expiration date. Never mix household bleach with ammonia or any other cleanser. Unexpired household bleach will be effective against coronaviruses when properly diluted.

Prepare a bleach solution by mixing:

- 5 tablespoons (1/3 cup) bleach per gallon of water, or
- 4 teaspoons bleach per quart of water

8. Employee Acknowledgement

Sign at Initial Acceptance and Further Modification

Signature Date

Signature Date

Signature Date

Signature Date

Attachment C – COVID-19 Safe Operations Checklist

As states and local municipalities around the country move into the next phase of the COVID-19 pandemic, some shelter-in-place orders are being lifted, with more anticipated in the coming month. Printing operations need to begin focusing on maintaining safe operations and preparing to bring additional staff back to work. Many printing operations have been running with reduced staff and/or with employees either working from home, working less hours, or temporarily laid off.

The following checklist highlights factors for printing operations to consider when moving into the next phase of reopening:

1. Government Orders

Monitor the applicable state and municipal reopening orders and industry-specific requirements. These orders will determine the appropriate time frame for returning to work and the conditions that must be met. For example, many orders require employees to wear face coverings and some require daily employee temperature checks.

2. Health and Safety Risk Assessment

Conduct a COVID-19 risk assessment at each work site and create or refine an existing mitigation plan to identify exposure risks. The risk assessment needs to consider how employees will interact with each other during the day as well as with visitors and delivery personnel.

The policies that should be considered include distancing measures such as physical modifications to the work site, physical barriers where appropriate, revised work practices, and reducing workforce density, along with employee training on appropriate interactions, work site cleaning and disinfection procedures, protective coverings and personal hygiene requirements or recommendations, health screening protocols for employees and visitors, and protocols for addressing COVID-19 cases.

3. Physical Distancing Actions

The current recommendation by the CDC and other government agencies is staying 6 feet apart from one another to prevent the spread of the virus. The following are some suggested approaches to achieving and maintaining the recommendation:

- Stagger start times for employees to prevent interaction and congregation as they report to and leave the facility.
- Space shift changes at least 10 minutes apart to prevent shift cross-contamination.
- When appropriate, use teleworking options for qualifying employees.
- Consider having employees return to work on alternating days or staggered schedules so the number of employees in the office at the same time is reduced.
- Stagger lunch and break times. Close break rooms, or redesign them to maximize distance between tables, vending, appliances, etc. Space chairs 6-10 feet apart and mark floors where chairs should be placed.
- Limit attendance at meetings and ensure employees can sit or stand at least 6 feet apart in conference rooms or other meeting areas.

- Schedule cleaning immediately following any gathering in conference or meeting rooms. Do not conduct back-to-back meetings to avoid unnecessary employee contact and to provide time to immediately sanitize the meeting room after use.
- Install physical distancing decals on the floors of any shared spaces in the workplace to keep people 6 feet apart.
- Place physical markers or decals in high-traffic areas to keep people 6 feet apart.
- Post physical distancing reminders throughout the workplace.
- Post signs to limit the number of people allowed in common rooms and spaces at a given time, such as bathrooms, conference rooms, dining areas, and elevators.
- Post signs directing the flow of traffic in tight high-traffic areas to indicate one-way travel.
- Review the bathroom design. When possible, extend bathroom stall walls and doors from floor to ceiling. If floor-to-ceiling barriers cannot be installed between bathroom stalls and urinals, then block off certain stalls and urinals to allow for adequate space between units.
- Determine the capacity of people in the bathroom that allows for proper physical distancing and post the capacity limits accordingly.
- Transition to an electronic clock system. If that is not possible, designate one person to clock employees in and out of work or record their arrival and departure times if clocking in would otherwise require employees to be in close contact with each other or to touch the same equipment.
- Encourage employees with private offices to remain there as much as possible.
- Restructure open floor layouts to ensure that employees can work at least 6 feet away from each other. If physical distancing is not possible, install physical barriers to prevent employees from close contact with each other.
- Increase air exchange rate in the building and, whenever possible, locate air exchange vents away from employee workstations.
- Install clear barriers between workspaces, in reception areas, or between customers and employees that can be easily cleaned and are high enough to prevent contact.
- Adopt videoconference guidelines so that even when in the office, employees are discouraged from meeting in person.
- Train employees to refrain from physical contact, such as handshakes or personal exchanges of materials.
- Eliminate nonessential business travel. For essential business travel, consider alternatives when such travel is to locations with ongoing COVID-19 outbreaks as identified by CDC travel warnings and other trusted public health authorities.

- Limit out-of-office business meetings to only those that are essential. Train employees to practice measures to prevent contamination when at business meetings, including no physical contact, physical distancing, and wearing a face cover.
- Limit one person to a vehicle, if possible.
- Have products and supplies delivered through curbside pickup or delivery.
- Require all visitors to verify their health status prior to entry through targeted inquiry, and to be given access only to areas necessary for purposes of the visit.

4. Sanitation and Hygiene Measures

To minimize the risk of COVID-19 transmission, certain good hygiene and infection control practices are being recommended by the [CDC](#) and [OSHA](#). The [EPA](#) has issued guidance on disinfectants for use against COVID-19, and the CDC has issued guidance on cleaning and disinfecting workplaces, which employers should follow.

Any employee expected to use cleaners and disinfectants needs to be trained under OSHA's Hazard Communication Standard and Personal Protective Equipment Standard in the hazards associated with the chemicals and how to properly use the designated PPE. Document all training and other instructions provided to each employee.

PRINTING United Alliance has also created a [sanitation guide](#) based on CDC recommendations. The sanitation guide provides additional information on cleaning and sanitizing the workplace.

These measures include:

- Posting signs reminding employees to not touch their face, particularly eyes, nose, and mouth with their hands.
- Promoting frequent [20-second hand-washing](#) and making soap and running water readily available.
- Placing hand sanitizer stations at strategic locations around the facility.
- Training employees to cover their coughs and sneezes.
- Providing tissues and no-touch, lined, lidded, garbage cans.
- Requiring workers to stay home when they are ill or have been exposed.
- Prohibiting shared personal work equipment, if feasible, such as desks, telephones, headsets (or any other equipment that will touch the face), computers, and work tools.
- Keeping sanitizing products next to shared work equipment and requiring the cleaning and disinfecting of such items immediately after use.
- Training employees to disinfect common surfaces following use, such as microwaves, vending machines, and refrigerator handles.

- Implementing routine and careful cleaning and disinfecting of frequently touched surfaces such as drinking fountains, elevator buttons, doorknobs, light switches, handrails, kitchen/breakroom/lunchroom appliances, coffee pots, countertops, drawer pulls, tables, sinks, faucets, toilet handles, push plates, phones, keys, remote controls, desks, chairs, printers, keyboards, computer mice, and thermostats.
- Having employees or dedicated personnel conduct routine and careful cleaning and disinfecting of work areas, surfaces, and equipment.
- Where feasible, propping open all doors to minimize the touching of door handles, knobs, and push plates. When not feasible, providing paper towels or other similar wipes and a waste container to allow the doors to be opened or closed without handle contact.
- As possible, installing automatic door and light openers to minimize touching of these common surfaces.
- As possible, suspending or reconfiguring security practices that require contact with frequently touched surfaces, such as PIN-entry devices, thumbprint scanners, time clock stations, and in sign-in books.

5. Personnel Issues

Due to the declaration of the COVID-19 pandemic, employers are provided greater leeway under the regulations and permitted to make certain medical inquiries which would otherwise be impermissible. The [EEOC](#) has issued guidance allowing employers to take employees' temperatures, send employees with coronavirus symptoms home, ask employees if they are experiencing symptoms of coronavirus, and ask employees why they are taking sick leave.

The EEOC issued additional guidance allowing employers to test employees for COVID-19 before allowing them to return to work. While employers may also require a note certifying fitness for duty in order to return to work, the EEOC cautions that many medical offices are overloaded, and employees may have difficulty obtaining testing or fit-for-duty letters from medical professionals. Accordingly, flexibility and best judgement under the circumstance must be exercised.

- Require employees to work from home or to take leave if an employee has symptoms of COVID-19 or has been diagnosed with COVID-19 in the past 14 days. Employees may only return to work in the facility if cleared by a medical professional and has twice tested negative for COVID-19, 72 hours apart.
- Because printing operations have been designated as an essential business, if an employee has been exposed to COVID-19 and is asymptomatic, the company can follow the [CDC guidance for safety practices for critical infrastructure workers](#).
- Require any employee who becomes sick or displays COVID-19 symptoms during the employee's work shift to go home immediately. If it is not possible for the employee to go home immediately, the employee must self-isolate until able to leave work. The surfaces of the workplace should be cleaned immediately by a person in appropriate PPE, and the work area should be isolated for at least 24 hours.

- Consider screening all employees daily for respiratory and other symptoms such as a temperature. (Some states and local municipalities are requiring temperature screening of essential workers, such as those in printing operations.) Unless the temperature of employees can be measured discreetly, temperature screenings need to take place in a private room and temperature recordings need to be treated as a confidential medical record under the Americans with Disabilities Act (ADA). If an employer cannot obtain an infrared/forehead thermometer, it may require employees to take their temperatures at home and attest that they do not have any fever or elevated temperature.
- Employers may also require and administer COVID-19 testing to employees, however, the limited availability of tests may make this difficult to accomplish.
- Consider requiring employees to wear face coverings. **(Some states and local municipalities are requiring essential workers, such as those in printing operations, to wear face coverings.)** The EEOC issued guidance stating that an employer may require employees to wear protective gear (e.g., masks and gloves) and observe infection-control practices (e.g., regular hand-washing and physical distancing protocols). If masks and face coverings are required, they need to be provided by the employer. Masks and face coverings are regulated by OSHA and, as a minimum, employees must be given a copy of OSHA [Appendix D](#) Information for Employees Using Respirators When Not Required Under the Standard. It contains information about the proper use and limitations of these types of respirators. If employees are given an N95 mask, this is a respirator and a formal respirator program is required to be implemented.
- Where an employee is unable to wear a face mask due to a medical issue or a disability, the employer must make a reasonable related accommodation pursuant to the ADA. These accommodations include non-latex gloves, modified face masks for interpreters or others who communicate through lip reading, or individuals with autism who cannot tolerate face coverings. For a religious accommodation under Title VII (such as modified equipment due to religious garb), the employer should discuss the request and provide the modification or an alternative if it is feasible, not an undue hardship, and does not pose a direct threat to the employee or others.
- Whenever possible, accommodate employees who are at higher risk for severe illness, as [defined by the CDC guidelines](#). Accommodations may include work assignments that may have lower risk of exposure to the virus or teleworking arrangements, if requested by the employee. Do not prevent employees in higher-risk populations from returning to work if they wish to do so.
- For employees that are not in the higher-risk populations and are reluctant to report to work, try and accommodate the request, but an employer can mandate attendance and take appropriate disciplinary action for workers for violating its attendance policy. Depending on the employee, putting them on leave or using existing time-off policy, which typically requires approval to use vacation or PTO, may be a better choice than termination.

- Employees can refuse to work if they reasonably believe they are in imminent danger, according to the Occupational Safety and Health Act. They must have a reasonable belief that there is a threat of death or serious physical harm likely to occur immediately or within a short period for this protection to apply. An employee can refuse to come to work if:
 - The employee has a specific fear of infection that is based on fact — not just a generalized fear of contracting COVID-19 infection in the workplace.
 - The employer cannot address the employee's specific fear in a manner designed to ensure a safe working environment.
- The National Labor Relations Act grants employees the right to join together to engage in [protected concerted activity](#). Employees who assert such rights, including by joining together to refuse to work in unsafe conditions, are generally protected from discipline.
- The ADA requires employers to reasonably accommodate employees who request altered work site arrangements, remote work, or time off from work due to underlying medical conditions that may put them at greater risk from COVID-19. The [EEOC's guidance on COVID-19 and the ADA](#) notes that accommodations may include changes to the work environment to reduce contact with others, such as using physical separators/barriers between workstations.
- The FFCRA allows an employee to self-quarantine if a health care provider advises an employee to do so because the employee is particularly vulnerable to COVID-19. The FFCRA applies to employers with fewer than 500 employees, and the quarantine must prevent the employee from working or teleworking. [FFCRA regulations](#) permit employers to require documentation for paid sick leave.
- Any employers taking temperatures, administering COVID-19 tests, or asking employees about symptoms should maintain all information collected as a confidential medical record in compliance with the ADA, the Health Insurance Portability and Accountability Act, and state and federal privacy laws.
- Establish communications channels for employees to address concerns to promptly address any health and safety concerns brought by employees.
- Remind employees and management that discrimination and retaliation to concerns raised about safety or other matters is strictly prohibited.

Attachment D – Visitor Questionnaire and Privacy Notice

The safety of our employees, supplier partners, customers, families, and visitors remains [Company Name’s] first priority. To prevent the spread of infectious disease and reduce the potential risk of exposure for the people in our facility, [Company Name] requires all visitors to complete this short questionnaire. This document will be kept confidential and shredded after 45 days unless required for epidemiological investigation.

Visitor’s Name:	Date/Time of Visit:
Visitor’s Company/Organization:	Business Purpose:

Self-Declaration by Visitor

1	Have you experienced any cold or flu-like symptoms in the last 14 days (cough, fever, shortness of breath or difficulty breathing, chills, repeated shaking with chills, muscle pain, headache, sore throat, new loss of smell or taste, nausea, diarrhea, or vomiting)? <input type="checkbox"/> Yes <input type="checkbox"/> No
2	Have you had close contact with or cared for someone diagnosed with COVID-19 within the last 14 days? <input type="checkbox"/> Yes <input type="checkbox"/> No
3	Have you traveled to any high-risk areas, domestically or internationally, in the last 14 days? <input type="checkbox"/> Yes <input type="checkbox"/> No
4	Have you been in close contact with anyone who has traveled internationally to high-risk areas within the last 14 days? <input type="checkbox"/> Yes <input type="checkbox"/> No

If the answer is “yes” to any of the questions above, access to the facility will be denied.

Signature (visitor): _____ Date: _____

Note: If you plan to be on-site for consecutive days, please immediately advise your [Company Name] host if any of your responses change. The information collected on this form will be used to determine your access right to [Company Name] _____ facilities.

For more information, see [Company Name]’s _____ privacy statement at [Insert email address]. _____ Any questions should be directed to

[Insert Name, Title, Phone, E-mail Address].

Access to facility: _____ Approved Denied

Signature (reviewer): _____ Date: _____

Attachment E — COVID-19 Toolbox Talk: What is COVID-19?

The novel coronavirus, COVID-19, is one of seven types of known human coronaviruses. COVID-19, like the MERS and SARS coronaviruses, likely evolved from a virus previously found in animals. The remaining known coronaviruses cause a significant percentage of colds in adults and children, and these are not a serious threat for otherwise healthy adults.

Patients with confirmed COVID-19 infection have reportedly had mild to severe respiratory illness with symptoms such as fever, dry cough, shortness of breath, chills, repeated shaking with chills, muscle pain, headache, sore throat, new loss of taste or smell, nausea, diarrhea, or vomiting.

According to the U.S. Department of Health and Human Services/CDC, Chinese authorities identified an outbreak caused by a novel — or new — coronavirus. The virus can cause mild to severe respiratory illness. The outbreak began in Wuhan, Hubei Province, China, and has spread to a growing number of other countries — including the United States.

1. How is COVID-19 Spread?

COVID-19, like other viruses, can spread between people. Infected people can spread COVID-19 through their respiratory secretions, especially when they cough or sneeze. According to the CDC, spread from person to person is most likely among close contacts (about 6 feet). Person-to-person spread is thought to occur mainly via respiratory droplets produced when an infected person coughs or sneezes, like influenza and other respiratory pathogens. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into their lungs. It is currently unclear if a person can get COVID-19 by touching a surface or object that has the virus on it and then touching their own mouth, nose, or possibly their eyes.

In assessing potential hazards, employers should consider whether their workers may encounter someone infected with COVID-19 in the course of their duties. Employers should also determine if workers could be exposed to environments (i.e., workplace) or materials (i.e., tools and/or equipment) contaminated with the virus.

Depending on the work setting, employers may also rely on identification of sick individuals who have signs, symptoms, and/or a history of travel to COVID-19-affected areas that indicate potential infection with the virus in order to help identify exposure risks for workers and implement appropriate control measures.

There is much more to learn about the transmissibility, severity, and other features associated with COVID-19, and investigations are ongoing.

2. COVID-19 Prevention and Work Practice Controls

Worker Responsibilities

- 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 70% alcohol. Always wash hands that are visibly soiled.
- If not wearing a face mask, cover your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Avoid close contact with people who are sick.
- Employees who have symptoms (e.g., fever, dry cough, shortness of breath, chills, repeated shaking with chills, muscle pain, headache, sore throat, new loss of taste or smell, nausea, diarrhea, vomiting) should notify their supervisor and stay home — DO NOT GO TO WORK.
- Sick employees should follow [CDC-recommended steps](#). Employees should not return to work until the criteria to [discontinue home isolation](#) are met, in consultation with health care providers and state and local health departments.

General Facility / Office Practices

- Clean AND disinfect frequently touched objects and surfaces such as workstations, keyboards, telephones, handrails, and doorknobs. Dirty surfaces can be cleaned with soap and water prior to disinfection. To disinfect, use [products that meet EPA's criteria for use against SARS-CoV-2](#), the cause of COVID-19, and are appropriate for the surface.
- Avoid using other employees' phones, desks, offices, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.
- Clean and disinfect frequently used tools and equipment on a regular basis.
 - This includes other elements of the facility where possible.
 - Employees should regularly do the same in their assigned work areas.
- Clean shared spaces such as offices and breakrooms/lunchrooms at least once per day.
- Disinfect shared surfaces (door handles, machinery controls, etc.) on a regular basis.
- Avoid sharing tools with co-workers if it can be avoided. If not, disinfect before and after each use.
- Any trash collected from the facility must be changed frequently by someone wearing gloves.
- In addition to regular PPE for workers engaged in various tasks (fall protection, hearing protection), employers will also provide:
 - Gloves: Gloves should be worn when required, such as working with hazardous chemicals. The type of glove worn should be appropriate to the task. If gloves are not typically required for the task, then any type of glove is acceptable, including latex gloves. Gloves should not be shared.
 - Eye protection: Eye protection should always be worn, when required.

Attachment F – Question Template for COVID-19 Positive Employee

1. Introductory Procedures

1. Identify yourself.
2. Confirm the identity of the person you are speaking to on the phone to make sure it is the employee.
3. Explain you are calling because he or she tested positive for COVID-19.
4. Tell the person you are calling because you want to help keep co-workers safe.
5. Confirm that the call is confidential.
6. Ask if the employee has time to talk now and is feeling able.

2. Sample Script

Thank you for letting us know about your diagnosis. We hope you and your family take whatever steps are necessary to focus on your health. Let us know if we can help in any way. We want to be sure we take appropriate steps to address the safety and work issues. Given your diagnosis, we ask that you remain away from the workplace per guidance from your health care provider and CDC guidelines. According to the latest from the CDC, those who have COVID-19 should continue home isolation until:

- At least three days (72 hours) have passed since recovery, which is defined as resolution of fever without the use of fever-reducing medications and improvement in respiratory symptoms (e.g., cough, shortness of breath) and;
- At least 10 days have passed since symptoms first appeared;
- An improvement of, and;
- Negative results of an Food and Drug Administration 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 (total of two negative specimens).

Direct the employee to the [CDC's Interim Guidance, Discontinuation of Isolation for Persons with COVID-19](#).

NOTE: In some instances, company policy may provide for a longer period of home isolation. Legal counsel is advised on this issue.

3. Questions to Determine the Onset of the Infectious Period

7. When did your symptoms start?
8. When were you tested for COVID-19?

4. Questions to Determine Contact with Others During Work Hours

9. Ask the employee who he or she had contact with during work hours starting TWO DAYS before the onset of symptoms:
 - a. Is there anything that would help your memory about the days just before you felt sick and up until the time you were in the building most recently?
 - b. Provide calendars, schedules, job orders, etc., for reference if necessary.
10. Other than your workstation, where were you in the building or on-site during your shift(s)?
 - a. Where did you go during your breaks?
 - b. Which bathroom(s) did you use?
 - c. Did you assist any co-workers in places other than your workstation?
 - d. Did you attend any meetings on- or off-site?
11. Who were you working with?
12. Did you share any tools or other devices with other employees?
13. Did you interact with any visitors to the building?
14. Did you interact with any vendors?
15. Discussing each interaction with a person identified in Questions 12-14, were any of them:
 - a. Within 6 feet of you?
 - b. If so, for how long? (If 30 minutes or more, this person is a close contact and needs specific notification of exposure.)
16. Did you travel for work during this period?

5. Questions to Determine Personal Issues

17. Does the employee have any personal property at work that he or she needs or wants?
18. Is there anything that the company can do that would be helpful to the employee?
19. Discuss any questions or issues around leave benefits during the isolation period.
 - a. FFCRA Emergency Sick Leave coverage
 - b. Any applicable PTO, Family and Medical Leave Act (FMLA), or disability coverage
20. Discuss any questions about health care coverage, if applicable.

6. Questions to Determine Work Issues

21. Resolve coverage and transition of work with the employee.
22. Discuss whether the employee wishes to work remotely if position allows.
23. Determine the employee's workload for the next two weeks while they are, presumably, off of work.
24. Ask if there are work issues that must be addressed during the employee's absence. Identify assignments and projects that are essential versus non-essential.
25. Verify that all meetings scheduled are on the employee's calendar.
26. Determine if there are employees who are cross-trained for the employee's position that could assist with their job duties during the next two weeks (or longer).

Attachment G — Sample Communication to Employee with Close Contact to Co-worker with a Positive COVID-19 Diagnosis

One of your co-workers has tested positive for COVID-19, and they have identified you as a close contact according to the CDC definition. The Centers for Disease Control and Prevention (CDC) defines “close contact” as a person that has been within 6 feet of the infected employee for a prolonged period of time.

We are here to support you. If you are at work, please prepare to leave as quickly as you can. Once you get home — or if you are already working from there — consult your doctor about next steps.

We are requiring you to refrain from coming to the workplace for five days from your last contact with your co-worker, which we believe was on [DATE HERE]_____. Please ask your physician to test you for the COVID-19 virus. In addition, please monitor your health, and if you experience symptoms of COVID-19, please seek immediate medical attention.

If you do not test positive for COVID-19 and do not develop symptoms that may be COVID-19 related, we ask that you contact [Insert HR Representative at Contact]_____ to let us know you’re not experiencing symptoms. Symptoms may include flu-like conditions such as headache, sore throat, dry cough, fever, shortness of breath or difficulty breathing, chills, or repeated shaking with chills. Other symptoms may include a loss of smell or taste, nausea, vomiting, or diarrhea. If you have questions about COVID-19 or your situation, please call your health care provider and visit the [CDC website](#).

Your privacy is important to us. Personal information will be maintained confidentially and in accordance with the Americans with Disabilities Act (ADA) and [Insert Company Name] privacy statement. Discrimination or harassment against individuals that are suspected to have tested positive for, or been exposed to, COVID-19, is strictly prohibited.

We have taken proactive steps to ensure our team’s safety, and we will continue to work directly with appropriate state and local public health officials and occupational safety and health professionals.

We care about your health and will be sure to answer any questions or concerns that you may have.

Sincerely,

[Insert Name] _____

[Title] _____

Attachment H — Sample Notification to Customers or Third Parties

We care about the health and safety of our customers and business partners. In this time of an unprecedented pandemic, we are treating health and safety as a top priority in guiding our business decisions. Today, we learned that one of our employees in the **[Insert Name of Facility]** _____ tested positive for COVID-19. We are notifying you because we understand you may have had recent contact with the affected individual. We want you to be aware of this situation so that you can self-monitor for development of symptoms and, if necessary, self-isolate and/or seek medical attention.

1. Exposure Risk Assessment

The Centers for Disease Control and Prevention (CDC) has published guidance for risk assessment and public health management when someone potentially has been exposed to COVID-19. The CDC categorizes contact with a COVID-19-infected individual on a scale of High, Medium, Low, or No Identifiable Risk, with attendant precautions at each level.

Under the CDC guidance, most casual professional interactions are classified as “Low Risk,” meaning that an individual has been in the same indoor environment as an infected person with symptomatic COVID-19 but has not had close contact. The risk classification becomes a “Medium Risk” if there has been close contact with an infected, symptomatic individual, meaning that they were within approximately 6 feet of each other for a prolonged period of time.

For Low Risk situations, the CDC recommends no precautions if the individual has no symptoms of COVID-19. If symptoms develop, then the CDC recommends self-isolation, social distancing, and seeking health advice to determine if medical evaluation is needed. For Medium Risk situations, the CDC recommends remaining at home or in a comparable setting, practicing social distancing, and active monitoring through state or local public health authorities. If symptoms develop, the CDC recommends self-isolation and public health assessment to determine the need for medical evaluation.

This is, of course, a personal decision. We wanted to share this information with you so that you can make an informed decision appropriate for your circumstances.

2. Steps We Have Taken

In addition to notifying those who may have come into contact with the infected individual, we are taking additional measures to ensure our facility is properly cleaned and disinfected. If you have occasion to visit our facility again, we want you to be aware of these measures. We have undertaken thorough cleaning and disinfection in accordance with the CDC's Environmental Cleaning and Disinfection Recommendations, best practices, and guidance from trusted sources. No customers or third parties will be permitted to access the facility until this process has been completed.

We will continue our heightened environmental cleaning regimen in accordance with CDC recommendations, including routine cleaning of frequently touched surfaces within the facility. We have instructed our employees to continue their personal regimen related to reducing transmission of the COVID-19 virus.

We reiterate our commitment to the health and safety of our workforce, our customers, and others with whom we interact. Thank you for your understanding during this challenging time.

Signature

Date

[Company Information]

Attachment I – Sample Notification to Workforce

The health and safety of our employees is our first priority, and in these unprecedented times this priority continues to guide our business decisions. On **[DATE HERE]**, _____ we learned that one of our employees in the facility tested positive for COVID-19. This individual is not currently in the workplace and will not return until cleared by medical professionals. The company is taking the following steps to provide the best possible work environment for you.

1. Facility Sanitation

The areas of the facility that have been accessed by the affected employee are closed to allow for thorough cleaning and disinfection. These steps will be taken in accordance with the best practices determined from the Centers for Disease Control and Prevention’s (CDC) Environmental Cleaning and Disinfection Recommendations, as well as other trusted sources. We anticipate that these steps will be completed by **[Insert Time &/or Date]** _____. Until then, only personnel with prior authorization will be permitted access to these areas of the facility.

2. Continued Attention to Hygiene

The company will continue its heightened sanitation protocol in accordance with company policy and best practices. All employees should continue their personal hygiene regimens related to reducing transmission of the COVID-19 virus.

3. Potential Exposure

The company has notified those employees and others who may have been exposed to the infected individual through close contact at work. According to the CDC, close contact means being within approximately 6 feet of a person with a symptomatic laboratory-confirmed COVID-19 case for a prolonged period of time. The CDC categorizes such exposure as a “Medium Risk,” which means the exposed individual, if asymptomatic, should remain at home, practice social distancing, and actively monitor for symptoms.

Thank you for your understanding during this challenging time. Should you have any questions, please see your supervisor or contact Human Resources **[Insert Contact Information]** _____.

Sincerely,

[Name]

[Title]

[Contact Information]

Resources

United States Department of Labor Mandated Posters
(through December 31, 2020)

[Employee Rights: Paid Sick Leave and Expanded Family and Medical Leave under The Families First Coronavirus Response Act \(FFCRA\)](#)

[Federal Employee Rights: Paid Sick Leave and Expanded Family and Medical Leave under The Families First Coronavirus Response Act \(FFCRA\)](#)

Worksave BC (Canada) posters

[Occupancy limit](#)

[Entry check for workers](#)

[Entry check for visitors](#)

[Cover coughs and sneezes](#)

[Hand-washing](#)

[How to use a mask](#)



Sample Policy: Emergency Paid Sick Leave Under the Families First Coronavirus Response Act

1. Eligibility

All current full- and part-time employees who are scheduled but unable to work (or telework) due to one of the following reasons are eligible for leave:

1. The employee is subject to a federal, state, or local quarantine or isolation order related to COVID-19.
2. The employee has been advised by a health care provider to self-quarantine due to concerns related to COVID-19.
3. The employee is experiencing symptoms of COVID-19 and seeking a medical diagnosis.
4. The employee is caring for an individual who is subject to either No. 1 or 2 above.
5. The employee is caring for his or her child if the school or place of care of the child has been closed, or the child care provider of such child is unavailable, due to COVID-19 precautions.
6. The employee is 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.

“Child” refers to any biological, adopted, or foster child; a stepchild; a legal ward; or a child of a person standing in loco parentis, who is:

- Under 18 years of age
- 18 or older and incapable of self-care because of a mental or physical disability

“Individual” means an immediate family member, roommate, or similar person with whom the employee has a relationship that creates an expectation that the employee would care for the person if he or she self-quarantined or was quarantined. Additionally, the individual being cared for must: a) be subject to a federal, state, or local quarantine or isolation order as described above; or b) have been advised by a health care provider to self-quarantine based on a belief that he or she has COVID-19, may have COVID-19, or is particularly vulnerable to COVID-19.

Furloughed employees are not eligible as there is no work available from which to take leave.

2. Amount of Paid Sick Leave

All eligible full-time employees will have up to 80 hours of paid sick leave available to use for the qualifying reasons above. Eligible part-time employees are entitled to the number of hours worked, on average, over a two-week period.

For employees with varying hours, one of two methods for computing the number of hours paid will be used:

- If the employee has worked six months or more, use the average number of hours that the employee was scheduled per day over the six-month period ending on the date on which the employee takes leave, including hours for which the employee took leave of any type.
- If the employee has worked less than six months, use the expected number of hours to be scheduled per day at the time of hire.

3. Increments and Intermittent Use of Leave

When working from home, employees may take emergency paid sick leave intermittently and in any increment as agreed with their manager. As in the example for FMLA leave, an employee may only need four hours per day of leave to care for his or her child or may only need to do so on Tuesdays and Thursdays. Managers and employees are expected to be flexible in scheduling wherever possible.

For those not teleworking and currently working on-site, an employee may only take intermittent leave for reason 5 above to care for his or her child when the school or place of care is closed, or the caregiver is unavailable due to COVID-19-related reasons. Per the regulations, as all other reasons for emergency paid sick leave could potentially expose an employee or others in the workplace to the virus, employees must either use the full amount of paid sick leave or use it in full-day increments until the reason for leave is over and it is safe for the employee to return to work.

4. Rate of Pay

Emergency sick leave will be paid at the employee's regular rate of pay, or minimum wage, whichever is greater, for leave taken for reasons 1-3 above. Employees taking leave for reasons 4-6 will be compensated at two-thirds their regular rate of pay, or minimum wage, whichever is greater. Pay will not exceed:

- \$511 per day and \$5,110 in total for leave taken for reasons 1-3 above.
- \$200 per day and \$2,000 in total for leave taken for reasons 4-6 above.

5. Interaction with Other Paid Leave

The employee may use emergency paid sick leave under this policy before using any other paid time off for the qualifying reasons stated above.

Employees on expanded FMLA leave under this policy may use emergency paid sick leave concurrently with that leave. Emergency paid sick leave may also be used when an employee is on leave under traditional FMLA for his or her own COVID-19-related serious health condition or to care for a qualified family member with such a condition.

6. Procedure for Requesting Emergency Paid Sick Leave

Employees must notify their manager or the Director of Human Resources of the need and specific reason for leave under this policy. A form will be provided to all employees in a manner accessible to all. Verbal notification will be accepted until practicable to provide written notice.

Documentation supporting the need for leave must be included with the leave request form, such as:

- A copy of the federal, state, or local quarantine or isolation order related to COVID-19 as applicable to the employee or the name of the government entity that issued the order.
- Written documentation by a health care provider advising the employee to self-quarantine due to concerns related to COVID-19 or the name of the provider who advised the employee.
- The name and relation of the individual the employee is taking leave to care for who is subject to a quarantine or isolation order or is advised to self-quarantine.
- The name and age of the child or children being cared for; the name of the school, place of care, or child care provider that closed or became unavailable; and a statement that no other suitable person is available to care for the child during the period of requested leave.
 - For children over age 14, a statement indicating the special circumstances that require the employee to provide care during daylight hours.

Once emergency paid sick leave has begun, the employee and his or her manager must determine reasonable procedures for the employee to report periodically on the employee's status and intent to continue to receive paid sick time.

7. Carryover

Paid emergency sick leave under this policy will not be provided beyond Dec. 31, 2020. Any unused paid sick leave will not carry over to the next year or be paid out to employees.

8. Job Protections

No employee who appropriately utilizes emergency paid sick leave under this policy will be discharged, disciplined, or discriminated against for work time missed due to this leave.

Please contact the HR Department with any questions.

Sample Policy: FMLA Leave Expansion and Emergency Paid Sick Leave Policy Under the Families First Coronavirus Response Act

1. Purpose

The purpose of this policy is to comply with the Families First Coronavirus Response Act (FFCRA) and to assist employees affected by the COVID-19 outbreak with job-protected leave and pay, where applicable. This policy will be in effect from April 1, 2020, until Dec. 31, 2020. Our existing FMLA leave policy still applies to all other FMLA-qualifying reasons for leave outside of this policy.

2. Expanded FMLA Leave

Employee Eligibility

All current employees who have been employed with [COMPANY] for at least 30 days and are actively scheduled for work are eligible for leave under this policy.

Employees laid off or otherwise terminated on or after March 1, 2020, who are rehired on or before Dec. 31, 2020, are eligible for leave upon reinstatement if they had previously been employed with

[COMPANY] _____ for 30 or more of the 60 calendar days prior to their layoff or termination.

Reason for Leave

Eligible employees are those who are unable to work (or telework) due to a need to care for their child when a school or place of care has been closed, or when the regular child care provider is unavailable due to a public health emergency with respect to COVID-19.

“Child” refers to a biological, adopted, or foster child; a stepchild; a legal ward; or a child of a person standing in loco parentis, who is:

- Under 18 years of age.
- 18 or older and incapable of self-care because of a mental or physical disability.

“Child care provider” refers to a provider who receives compensation for providing child care services on a regular basis, including:

- A center-based child care provider.
- A group home child care provider.
- A family child care provider (one individual who provides child care services for fewer than 24 hours per day, as the sole caregiver, and in a private residence).
- Other licensed provider of child care services for compensation.
- A child care provider that is 18 years of age or older who provides child care services to children who are either the grandchild, great grandchild, sibling (if such provider lives in a separate residence), niece, or nephew of such provider, at the direction of the parent.

“School” refers to an elementary or secondary school.

Duration of Leave

Employees will have up to 12 weeks of leave to use from April 1, 2020, through Dec. 31, 2020, for the purposes stated above. This time is included in and not in addition to the total FMLA leave entitlement of 12 weeks in a 12-month period.

For example, if an employee has already taken six weeks of FMLA leave, that employee would be eligible for another six weeks of FMLA leave under this policy.

Increments and Intermittent Use of Leave

Employees may take expanded FMLA leave intermittently and in any increment agreed to with their manager. For example, an employee may only need four hours per day of leave to care for his or her child or may only need to do so on Tuesdays and Thursdays. Managers and employees are expected to be flexible in scheduling wherever possible.

Pay During Leave

Leave will be unpaid for the first 10 days of leave, however, employees may use accrued paid vacation, sick, or personal leave during this time. The employee may also elect to use the paid leave provided under the Emergency Paid Sick Leave Act, as further explained below. After the first 10 days, leave will be paid at two-thirds of an employee's regular rate of pay for the number of hours the employee would otherwise be scheduled to work. Pay will not exceed \$200 per day and \$10,000 in total, or \$12,000 in total if using emergency paid sick leave for the first two weeks. Any unused portion of this pay will not carry over to the next year.

For employees with varying hours, one of two methods for computing the number of hours paid will be used:

- If the employee has worked six months or more, the average number of hours that the employee was scheduled per day over the six-month period ending on the date on which the employee takes leave, including hours for which the employee took leave of any type.
- If the employee has worked less than six months, the expected number of hours to be scheduled per day at the time of hire.

Employee Status and Benefits During Leave

While an employee is on leave, the company will continue the employee's health benefits during the leave period at the same level and under the same conditions as if the employee had continued to work. While on paid leave, the company will continue to make payroll deductions to collect the employee's share of the premium for elected voluntary products. During any unpaid portions of leave, the employee must continue to make this payment per instructions from the HR department. The employee may cancel any voluntary products and re-enroll during the next open enrollment.

While on leave, [COMPANY] _____ will continue coverage of the company sponsored Life and Short-Term Disability coverage.

Procedure for Requesting Leave

All employees requesting FMLA leave must provide written notice of the need for leave to the Director of Human Resources as soon as is practicable. Verbal notice will otherwise be accepted until written notice can be provided.

Notice of the need for leave must include:

- The name and age of the child or children being care for.
- The name of the school, place of care, or child care provider that closed or became unavailable due to COVID-19 reasons.
- A statement representing that no other suitable person is available to care for the child or children during the period of requested leave.
 - For children over the age of 14, a statement indicating the special circumstances that require the employee to provide care during daylight hours.

On a basis that does not discriminate against employees on FMLA leave, the company may require an employee on FMLA leave to report periodically on the employee's status and intent to return to work.

Employee Status After Leave

Generally, an employee who takes FMLA leave will be able to return to the same position or a position with equivalent status, pay, benefits, and other employment terms. The company may choose to exempt certain key employees from this requirement and not return them to the same or similar position when doing so will cause substantial and grievous economic injury to business operations. Key employees will be given written notice at the time FMLA leave is requested of their status as a key employee.

Please contact the HR department with any questions.