

# COVID-19 Preparedness & Response Plan

## General

The following COVID-19 preparedness & response plan has been established for Autumn Insurance & Benefits in accordance with the requirements in the [Executive Orders \(EOs\)](#) for COVID-19 signed by Governor Gretchen Whitmer, the OSHA [Guidance on Preparing Workplaces for COVID-19](#), and the latest [guidance](#) from the US Centers for Disease Control and Prevention (CDC). The purpose of this plan is to minimize or eliminate employee exposure to SARS-CoV-2.

The EOs, OSHA guidance, and CDC guidance for COVID-19 have general safeguards applicable for all workplaces and specific safeguards for certain industries. Michelle McCullough, Integrator/Director of Operations has read these guidance documents carefully, found the safeguards appropriate to Autumn Insurance & Benefits based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

As the COVID-19 situation evolves, the EOs and CDC guidance are periodically updated. Michelle McCullough, Integrator/Director of Operations will be responsible for visiting the EO webpage and CDC guidance webpage regularly (for example, weekly) for the latest information and for revising the plan as necessary. The EOs are found at: [State of Michigan Executive Orders](#). The CDC guidance documents are found at: [CDC COVID-19 Guidance Documents](#).

This plan reflects the EOs and CDC guidance as of July 1, 2020.

Autumn Insurance & Benefits has designated a worksite supervisor to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The worksite supervisor is Michelle McCullough (or designee). The supervisor will remain on-site at all times when employees are present on site. An alternate on-site employee may be designated to perform the supervisory role.

The plan will be made readily available to employees. The plan will be made available electronically via Autumn's website and internal network.

## Exposure Determination

Autumn Insurance & Benefits has evaluated routine and reasonably anticipated tasks and procedures for all employees to determine whether there is actual or reasonably anticipated employee exposure to SARS-CoV-2. Michelle McCullough, Integrator/Director of Operations was responsible for the exposure determination.

Autumn Insurance & Benefits has determined that its employees' jobs fall into only the lower exposure and medium exposure risk categories as defined by the OSHA Guidance on Preparing Workplaces for COVID-19:

- **Lower Exposure Risk Jobs.** These jobs do not require contact with known or suspected cases of COVID-19 nor frequent close contact (for example, within six feet) with the general public. Workers in this category have minimal occupational contact with the public and other coworkers. Examples are small offices, small manufacturing plants (less than 10 employees), small construction operations (less than 10 employees), and low-volume retail establishments, provided employees have infrequent close contact with coworkers and the public.
  
- **Medium Exposure Risk Jobs.** These jobs are those that require frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients. Examples are most jobs at manufacturing plants, construction sites, schools, high-volume retail settings, and other high-population-density work environments.

Michelle McCullough verifies that Autumn Insurance & Benefits has no high-risk exposure jobs. High exposure risk jobs have high potential for exposure to known and suspected cases of COVID-19. Examples are most jobs in healthcare, medical transport, nursing homes and residential care facilities, mortuaries, law enforcement, and correctional facilities.

Autumn Insurance & Benefits has categorized its jobs as follows:

<b>Job/Task</b>	<b>Exposure Risk Determination (Lower or Medium)</b>	<b>Qualifying Factors (For Example, No Public Contact, Public Contact)</b>
Account Manager	Lower	Minimal public contact Minimal coworker contact
Producer/Sales	Lower	Minimal public contact Minimal coworker contact
Administrative (IT, Accounting, Admin, Operations)	Lower	Minimal public contact Minimal coworker contact

## Engineering Controls

Autumn Insurance & Benefits has implemented feasible engineering controls to minimize or eliminate employee exposure to SARS-CoV-2. Engineering controls involve isolating employees from work-related hazards using ventilation and other engineered solutions. In workplaces where they are appropriate, these types of controls reduce exposure to hazards without relying on worker behavior and can be the most cost-effective solution to implement.

For lower exposure risk jobs, new engineering controls are not required. For medium exposure risk jobs, engineering controls can include:

- Installing physical barriers (such as clear plastic sneeze guards) between coworkers or between workers and customers.
- Increasing the amount of ventilation in the building.
- Increasing the amount of fresh outdoor air that is introduced into the building.

The Integrator/Director of Operations will be responsible for seeing that the correct engineering controls are chosen, installed, maintained for effectiveness, and serviced when necessary.

The following engineering controls have been implemented:

Job/Task	Engineering Control
Building landlord	Increased ventilation in the building
Building landlord	Increased fresh outdoor air introduced into the building

## Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. The Integrator/Director of Operations will be responsible for seeing that the correct administrative controls are chosen, implemented and maintained for effectiveness.

The following administrative controls have been established for Autumn:

Job/Task	Administrative Control
All employees	Maintain at least six feet from everyone on the worksite.
Integrator/Director of Operations	Use ground markings and signs to prompt employees to remain six feet from others.
Supervisors/Managers	Promote remote work (telecommuting) to the fullest extent possible.

Supervisors/Managers	Promote staggered schedules and/or alternating days to minimize the number of employees in the office at one time.
Supervisors/Managers	Restrict business-related travel for employees to essential travel only.
All employees	Restrict face-to-face meetings. Communicate with others through phone, email, teleconferencing, and web conferencing.
All employees	Restrict non-essential visitors from coming to the office.
All employees	Minimize the sharing of desk equipment and personal items.
Integrator/Director of Operations	Provide employees with non-medical grade face coverings (cloth face coverings).
All employees	Wear cloth face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.
All permitted visitors	Require visitors to wear cloth face coverings.
All employees	Encourage clients and non-essential visitors to conduct business transactions via phone or electronic means.
Integrator/Director of Operations	Encourage proper cough and sneeze etiquette by employees, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands.
Integrator/Director of Operations	Ensure that sick leave policies are flexible and consistent with public health guidance, so employees do not report to work sick.
Integrator/Director of Operations	Do not require a healthcare provider's note for employees who are sick with acute respiratory illness to validate their illness.
Integrator/Director of Operations	Maintain flexible policies that permit employees to stay home to care for a sick family member.

## Hand Hygiene

The Integrator/Director of Operations will be responsible for seeing that adequate handwashing facilities are available in the workplace and that regular handwashing is required. Frequency of such handwashing will be determined in part by factors such as when and how often the employees' hands are potentially exposed to SARS-CoV-2. When handwashing facilities are not available, Autumn Insurance & Benefits shall provide employees with antiseptic hand sanitizer. Autumn Insurance & Benefits will provide time for employees to wash hands frequently and to use hand sanitizer.

## Disinfection of Environmental Surfaces

Autumn Insurance & Benefits will increase facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (for example, door handles), paying special attention to shared equipment (for example, file cabinets, office equipment, kitchen appliances). Autumn Insurance & Benefits will make cleaning supplies available to employees at the worksite.

The Integrator/Director of Operations will be responsible for seeing that environmental surface in the workplace are cleaned and disinfected. Frequency of such disinfection will be determined in part by factors such as when and how often the environmental surfaces are potentially exposed to SARS-CoV-2. When choosing cleaning chemicals, Autumn Insurance & Benefits will consult information on Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens. Products with EPA-approved emerging viral pathogens claims are expected to be effective against SARS-CoV-2 based on data for harder to kill viruses. The manufacturer's instructions for use of all cleaning and disinfection products will be strictly adhered to.

The following is a list of environmental surfaces, methods used to disinfect, and the frequency of such disinfection:

<b>Surface</b>	<b>Method/Disinfectant Used</b>	<b>Schedule/Frequency</b>
Kitchen equipment	Disinfectant wipes or disinfectant spray solution with paper towel	Twice daily
Common area tools and equipment	Disinfectant wipes or disinfectant spray solution with paper towel	After each use
Office door handles	Disinfectant wipes or disinfectant spray solution with paper towel	Three times daily
Common area tables and chairs	Disinfectant wipes or disinfectant spray solution with paper towel	After each use
Employee desks, chairs, equipment	Disinfectant wipes or disinfectant spray solution with paper towel	Twice daily

Autumn Insurance & Benefits will perform enhanced cleaning and disinfection after persons confirmed to have COVID-19 have been in a work area. In the interim, that work area will be temporarily closed, and employees will be sent home or relocated. Michelle McCullough, Integrator/Director of Operations will be responsible for seeing

that this protocol is followed.

An outsourced cleaning service that specializes in enhanced cleaning may be utilized after a COVID-19 case is confirmed in our office. This cleaning is meant to provide a more thorough and deep cleaning than the general environmental surfaces list above.

## **Personal Protective Equipment (PPE)**

Autumn Insurance & Benefits will provide employees with personal protective equipment for protection from SARS-CoV-2 appropriate to the exposure risk associated with the job. The PPE policy will follow the CDC and OSHA guidance applicable to the industry and types of jobs at the workplace, and it will be in accordance with latest EOs. All types of PPE are to be:

- Selected based upon the hazard to the worker.
- Consistently and properly worn.
- Regularly inspected, maintained, and replaced, as necessary.
- Properly removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, others, or the environment.

Autumn Insurance & Benefits will provide non-medical grade face coverings (cloth face coverings) to employees. (Cloth face coverings are technically not considered PPE.) Autumn Insurance & Benefits will require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace. Employees must also wear face coverings while in building common areas. Autumn Insurance & Benefits will consider face shields when employees cannot consistently maintain three feet of separation from other individuals in the workplace.

The following type(s) of PPE have been selected for use:

<b>Job/Task</b>	<b>PPE</b>
All employees and essential visitors	Face covering must be worn when employees cannot maintain 6 feet of separation from other individuals
All employees and essential visitors	Face covering must be worn before entering the building, and while in the stairways, hallways, elevators, and bathrooms
Cleaning environmental surfaces	At the employee's discretion, protective gloves may be worn while cleaning

## **Health Surveillance**

Autumn Insurance & Benefits has implemented a screening protocol to identify known or suspected cases of COVID-19 among employees and isolate them from the remainder of the workforce. Michelle McCullough, Integrator/Director of Operations will

be responsible for ensuring that all required health surveillance provisions are performed.

Before workers enter the place of employment at the start of each day, Autumn Insurance & Benefits will have employees self-screen for COVID-19. Autumn Insurance & Benefits will have employees complete a questionnaire covering the signs and symptoms of COVID-19 and their exposure to people with suspected or confirmed COVID-19. Autumn Insurance & Benefits will similarly screen any other essential visitors entering the worksite.

Employees have been directed to promptly report any signs and symptoms of COVID-19 to the Integrator/Director of Operations before and during the workday. The specific instructions for employee reporting signs and symptoms of COVID-19 are as follows:

**If the employee has not yet entered the building/office:**

The employee should remain at home, return to their vehicle, or isolate in a nearby space away from other individuals. The employee should notify Michelle McCullough at 810-459-1226 or Shelly Bakerian at 734-968-5625. The employee should not enter the building/office until he/she has received further instructions.

**If the employee is already inside the building/office:**

The employee should immediately isolate to a nearby space away from other individuals. The employee should immediately contact Michelle McCullough at 810-459-1226 or Shelly Bakerian at 734-968-5625 for further instructions. The employee should not leave the isolation room until a path is safe and clear for the symptomatic employee to leave the office/building.

Autumn Insurance & Benefits will not discharge, discipline, or otherwise retaliate against employees who stay at home or who leave work when they are at particular risk of infecting others with COVID-19.

When an employee is identified with a confirmed case of COVID-19, within 24 hours, the Integrator/Director of Operations will notify both the local public health department, and any co-workers or visitors who may have come into contact with the person who is the confirmed case of COVID-19. When notifying coworkers and visitors, Autumn Insurance & Benefits will not reveal the name or identity of the confirmed case.

Autumn Insurance & Benefits will allow employees with a confirmed or suspected case of COVID-19 to return to the workplace only after they are no longer infectious according to the latest guidelines from the CDC.

## **Training**

The Integrator/Director of Operations shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

Autumn Insurance & Benefits will train workers on, at a minimum:

1. Routes by which the virus causing COVID-19 is transmitted from person to person.
2. Distance that the virus can travel in the air, as well as the time it remains viable in the air and on environmental surfaces.
3. Symptoms of COVID-19.
4. Workplace infection-control practices.
5. The proper use of PPE.
6. Steps the worker must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
7. How to report unsafe working conditions.

The Integrator/Director of Operations shall create a record of the training. The record will list the names of the employees trained, the training date, name of trainer, and content of training.

## **Recordkeeping**

Autumn Insurance & Benefits will maintain the following records as they relate to the COVID-19 preparedness and response plan:

1. Training records.
2. A record of daily entry self-screening results for all employees or visitors entering the workplace, including a questionnaire covering signs and symptoms of COVID-19 and exposure to people with suspected or confirmed COVID-19.
3. When an employee is identified with a confirmed case of COVID-19, a record that within 24 hours the local public health department was notified as well as any co-workers or visitors who may have come into contact with the person who was the confirmed case of COVID-19.

The Integrator/Director of Operations will ensure that the required records are kept.