

## **COVID-19 Preparedness and Response Plan**

Following the applicable orders from MDHHS and emergency rules issued by MI-OSHA, Conybeare Law Office, P.C. (“Company”) institutes this COVID-19 Preparedness and Response Plan (“Plan”).

Company aims to protect its employees by enacting appropriate prevention efforts. Company is continually monitoring guidance from local, state, and federal health officials and implementing workplace and Plan modifications where necessary.

Employees or Non-employees with questions are encouraged to contact Matthew Conklin via phone at 269-281-7720 or email at [Matt@conybearelaw.com](mailto:Matt@conybearelaw.com).

Company designates the following supervisors/employees to implement, monitor, or report on this Plan: Barry Conybeare, Matthew Conklin, Leah Franke, and Angela Hathaway (Kalamazoo office only). Company will designate additional individuals as needed.

A link to this Plan is on Company website—[www.conybearelaw.com](http://www.conybearelaw.com).

### **1. Prevention Efforts and Workplace Controls**

MDHHS requires that all non-employees wear face coverings in a Company office.

Company limits the number of employees present in the office and the movement of employees between office locations to no more than is strictly necessary.

Only workers permitted by MDHHS Orders and MI-OSHA Rules to resume duties are directed to report on-site. For such workers, Company abides by the recommended social distancing and other safety measures and establishes the following:

- Gatherings are prohibited if social distancing cannot be maintained
- Staff meetings using Microsoft Teams
- Employees are encouraged to maintain physical distance even when on break, as well as before and after working hours
- Employees are required to maintain physical distance when reporting to work and leaving work
- Company utilizes signs, and physical barriers, as appropriate, to further facilitate social distancing
- Employees’ work stations are no fewer than six feet apart
- Company restricts usage of non-essential common space
- Company turns off water fountains
- Employees’ interactions with the general public and delivery personnel are modified to allow for social distancing and additional physical space between parties
- Non-essential in-person meetings are postponed or canceled, as is non-essential business travel

Company provides employees with, at a minimum, non-medical grade face coverings, as well as appropriate personal protective equipment (“PPE”) (e.g., gloves, face masks). Masks must be

worn by employees when in shared spaces (e.g., in-person meetings, restrooms, hallways). PPE is available at Main Level Bay #1 and, after use, must be discarded in a waste bin.

Also, Company is instituting the following cleanliness measures:

- Implementing a cleanliness plan and infection-control measures following EPA Guidance for Cleaning and Disinfecting
- Performing routine cleaning and disinfection with an EPA-approved disinfectant, especially of common areas and frequently touched surfaces
- Identifying what needs to be disinfected with an EPA-approved disinfectant or EPA-approved alternative, considering estimates that COVID-19 lasts in the air for 3 hours and on common surfaces for varying lengths of time (e.g., 5 days on glass; 4 days on wood; 3 days on plastic and stainless steel; and 24 hours on cardboard)
- Providing hand-sanitizing stations in high-traffic areas to enable easy access by employees

Company identifies the following locations as high-risk areas: HALLWAYS, ELEVATORS, BREAK AREAS, and KITCHEN AREAS. Employees must maintain social distancing when occupying or passing through these areas.

Company provides employees with cleaning and disinfecting supplies that can be found at Main Level Bay #1.

Employees are expected to minimize COVID-19 exposure by:

- Complying with Company's daily screening process
- Going home if they feel sick
- Frequently washing or disinfecting their hands
- Staying at least 6 feet apart
- Following applicable MDHHS Orders and MI-OSHA Rules by wearing a face mask in the shared office areas—like hallways, files rooms, and restrooms; however, they do not need to wear a mask in their workspace
- Cleaning their workspace at the beginning and end of each day
- Avoiding the use of other employees' phones, computers, or other work equipment
- Disinfecting shared office equipment—such as a copier, staplers, paper hole punch—and washing or disinfecting their hands immediately after use
- Limit face to face meeting with coworkers instead use Microsoft Teams
- Complying with self-isolation or quarantine orders

Employees are trained on the information contained within this Plan.

#### Supplemental Measures Upon Notification of a Positive COVID-19 Diagnosis or Symptoms

In response to a confirmed diagnosis or display of COVID-19 symptoms, as defined in the daily screening process, by any individual who worked at or visited the office, Company:

- Informs all employees and office visitors who may have come into close contact with the diagnosed/symptomatic individual in the 48 hours preceding the onset of symptoms of potential exposure
- Communication of Covid-19 exposure will be done in the most practical method possible given time restraints
- Keeps confidential the identity of the diagnosed/symptomatic individual
- Implements its response plan and cleaning and disinfecting protocols, including shutting down appropriate areas of the office and conducting a deep cleaning of both the diagnosed/symptomatic individual's workspace and the areas potentially infected by the individual

All employees who worked in sustained proximity to the diagnosed/symptomatic individual in the 48-hour timeframe are also removed from the office; should these exposed employees later develop COVID-19 symptoms or receive a confirmed diagnosis, they may not report on-site until all return-to-work requirements are met, as defined below.

Company confidentially maintains a central log of diagnosed/symptomatic employees.

Company maintains documentation related to exposure notifications.

Company completes the appropriate MI-OSHA forms, "if it is more likely than not that a factor or exposure in the workplace caused or contributed to the illness." If an employee infects a coworker, the coworker has suffered a work-related illness if one of the recording criteria (e.g., medical treatment or days away from work) is met.

Risk and exposure determinations are made without regard to employees' protected characteristics, as defined by local, state, and federal law.

### Daily Screening Protocol

To prevent the spread of COVID-19 and reduce the potential risk of exposure, Company screens employees and visitors at dedicated office entry points using Spectrum Health's COVID-19 Symptom Checker <https://covid19symptomchecker.spectrumhealth.org/welcome> Individuals must complete the questionnaire on their mobile phone before entering Company's office. Spectrum Health hosts the questionnaire, and Company does not store or have access to response data.

- If the questionnaire result is a green checkmark or green lab beaker icon, individuals are welcome to come to the office. Individuals should take a screenshot of the result page or keep it open on the mobile phone.
- If an individual gets a different result or cannot complete the questionnaire, please call Company at 269-983-0561.

Once an individual enters the building, Company will take a picture of them holding their mobile phone with the green symptom result page/screenshot. To expedite the screening process, please be prepared to display the result page/photo. Finally, Company will check all individual's temperature using a contactless thermometer.

Company maintains documentation related to daily screenings.

Employees or non-employees that develop symptoms while in the office should immediately leave the office and contact Matthew Conklin at 269-281-7720.

### Return-to-Work Requirements

Employees who were themselves diagnosed with COVID-19, or experienced symptoms thereof, as defined by the daily screening process, may only return to work upon confirmation of the cessation of symptoms and contagiousness, proof of which may be acquired via the test-based strategy or the symptom-based strategy.

The test-based strategy is preferred but relies upon the availability of testing supplies and laboratory capacity. Under this strategy, employees may discontinue isolation and return to work upon achieving the following conditions:

- Resolution of fever without the use of fever-reducing medications
- Improvement in respiratory symptoms (e.g., cough, shortness of breath)
- Two consecutive negative results from COVID-19 tests conducted at least 24 hours apart and following the current FDA/CDC-recommended procedure

Under the symptom-based strategy, employees may discontinue isolation and return to work upon achieving the following conditions:

- At least 3 days (72 hours) have passed since recovery defined as resolution of fever without the use of fever-reducing medications
- Improvement in respiratory symptoms (e.g., cough, shortness of breath)
- At least 10 days have passed since symptoms first appeared

Employees who came into close contact with, or live with, an individual with a confirmed diagnosis or symptoms may return to work after 14 days have passed since the last close contact with the diagnosed/symptomatic individual, or the diagnosed/symptomatic individual receives a negative COVID-19 test.

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

### Worker Exposure Classification

All employees' "worker exposure" is classified as lower risk by the Occupational Safety and Health Administration's guidance because they do not frequently or closely interact with the general public, and social distancing can be maintained between coworkers.

Given this classification, no additional controls are recommended or required by OSHA at this time.

## 2. Workplace Flexibilities and Potential Benefits for Employees Affected by COVID-19

Employees who require leave beyond the Emergency Paid Sick Leave Act because of their own COVID-19 diagnosis/symptoms, or because they have had close contact or live with an individual with a COVID-19 diagnosis/symptoms, may be eligible for unpaid leave until permitted to return to work.

### Unemployment Compensation Benefits

Under the federal CARES Act, unemployment compensation benefits are expanded in terms of eligibility, amount, and duration.

Employees who are unable to report to work for reasons related to COVID-19 should contact Barry or Matt for information on unemployment compensation benefits. Such reasons include the following:

- Being under self-isolation or self-quarantine in response to elevated risk from COVID-19 due to being immunocompromised
- Displaying at least one of the principal symptoms of COVID-19 (i.e., fever, atypical cough, atypical shortness of breath)
- Having close contact in the last 14 days with a confirmed COVID-19 diagnosis
- Needing to care for someone with a confirmed COVID-19 diagnosis
- Fulfilling a family care responsibility as a result of a government directive (e.g., caring for a child whose school or childcare provider is closed or otherwise unavailable due to COVID-19)

## 3. Plan Updates and Expiration

This Plan responds to the COVID-19 outbreak. As this pandemic evolves, Company will update this Plan and its corresponding processes.

This Plan will expire upon the conclusion of its need, as determined by Company and following guidance from local, state, and federal health officials.