



Nulty CO-19 Preparedness and Response Plan

KALAMAZOO
OTSEGO
BUCHANAN
IRON MOUNTAIN

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Nulty CO-19 Preparedness and Response Plan:

We take the health and safety of our employees, clients and visitors very seriously. We are committed to reducing the risk of exposure to COVID-19 and to provide a healthy and safe workplace for our employees and for all who visit our locations

This Plan is based on information and guidance from the CDC and OSHA at the time of its development, and is subject to change based on further information provided by the CDC, OSHA, and other public officials. We may also amend this Plan based on operational needs.

We have identified the following potential sources to spread COVID-19 in the workplace:

- Co-workers
- Clients/General Public walk-ins
- Vendors/Visitors

Our employees fall into the following category:

- Lower exposure risk (the work performed does not require direct contact with people known or suspected to be infected with COVID-19 or frequent close contact with the public).

COVID-19 WORKPLACE COORDINATOR

We have designated the following individual as its COVID-19 Workplace Coordinator: Susan Culhane. The Coordinator is responsible for staying abreast of federal, state and local guidance and incorporating those recommendations into our workplace. The Coordinator is also responsible for reviewing human resources policies and practices to make sure that they are consistent with this Plan and existing federal, state and local requirements.

Susan can be reached at the following:

269.488.0322 or 269.760.8768

susan@nulty.com

RESPONSIBILITIES OF MANAGERS

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

RESPONSIBILITIES OF EMPLOYEES

We are asking every one of you to help with our prevention efforts while at work. In order to minimize the impact of COVID-19 at our worksite(s), everyone must play their part. As set forth below, we have instituted various housekeeping, social distancing, and other best practices at our workplace(s) to minimize exposure to



COVID-19 and prevent its spread in the workplace. All employees must follow these best practices at all times for them to be effective. Beyond these best practices, we require employees to report immediately to their manager if they are experiencing signs or symptoms of COVID-19, as described below. If employees have a specific question about this Plan or COVID-19, they should ask their manager.

OSHA and the CDC have provided the following control and preventative guidance for all, 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 for coughs and sneezes.
- Avoid close contact with people who are sick.
- While there is community spread of COVID-19, maintain appropriate social distance of six feet to the greatest extent possible.

In addition, employees must familiarize themselves with the symptoms and exposure risks of COVID-19. The primary symptoms of COVID-19 may include the following:

- Cough
- Shortness of breath or difficulty breathing
- Fever
- Chills
- Muscle Pain
- Sore Throat
- New loss of taste or smell

Less common symptoms have been reported, including gastrointestinal symptoms like nausea, vomiting or diarrhea.

If employees develop a fever and symptoms of respiratory illness, such as an atypical cough or shortness of breath, they must not report to work, notify their manager immediately, and consult their healthcare provider.

Likewise, if employees come into close contact with someone showing these symptoms, they must notify their manager immediately and consult their healthcare provider. We will also work to identify any employees who have close contact with individuals with COVID-19 symptoms.

“Close contact” is not brief or incidental contact with a person with COVID-19 symptoms. Instead, the CDC defines “close contact” as either:

- Being within approximately six feet of a COVID-19 infected person or a person with any COVID-19 symptom(s) for a “prolonged period of time;” or
- Having direct contact with infectious secretions of a COVID-19 infected person or a person with any COVID-19 symptom(s) (e.g., being coughed on).

There is no precise definition of “prolonged period of time.” CDC estimates range from 10 to 30 minutes. To protect employees, we use the lower end of this range and considers a prolonged period to be 10 to 15 minutes of exposure.



DISPLAYING COVID-19 SYMPTOMS

- Effective June 1st we ask that all employees take the “daily” self-assessment symptom questionnaire prior to coming to the office. We will take this questionnaire until further notice. [Daily Workplace Health Screening](#)
- If you are displaying any symptoms of Covid-19 you are to go home immediately or stay home. If possible, you can work remotely.
- If someone is displaying symptoms while at the office they will be asked to immediately go home.
- You may be eligible for Emergency Paid Sick Leave under the FFCRA Act. Also, if you have PTO remaining you will be required to use this time. Please see EPSL request form Page 7 and/or Expanded FML request form Page 9.
- Employee who test positive with Covid-19 must follow the State of Michigan return to work protocol:
 - Three days have passed since his or her symptoms have resolved; and (ii) seven days have passed since his or her symptoms first appeared or since he or she were swabbed for the test that yielded the positive result. These protections cease to apply to anyone who, after showing symptoms, receives a negative COVID-19 test.
- Employee will need to work with their manager on an appropriate return to work timeline.
- We encourage employees to stay home if they have been in close contact with a confirmed or suspected case of COVID-19:
 - You may be eligible for Emergency Paid Sick Leave under the FFCRA Act. Also, if you have PTO remaining you will be required to use this time. Please see EPSL request form Page 7 and/or Expanded FML request form Page 9.
 - The State of Michigan protocol for those who come in “close contact” with an individual who tests positive for COVID-19 or with an individual who displays one or more of the principal symptoms of COVID-19 must work from home or may be eligible for paid/unpaid leave until either 14 days have passed since the last close contact with the sick or symptomatic individual or the sick or symptomatic individual receives a negative COVID-19 test.
 - Employee will need to work with their manager on an appropriate return to work timeline.
- If we have a confirmed case of COVID-19 with an employee who has been working in the office we will:
 - Communicate a plan with co-workers, including workplace contact tracing and CDC-recommended cleaning and disinfecting in all affected areas
 - Work with local health department & evaluate OSHA reporting/recordkeeping requirements
- We plan to perform increased routine environmental cleaning and disinfection. We ask that employees:
 - Sanitize their work areas upon arrival, throughout the workday, and immediately before departure
 - Routinely clean and disinfect all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, and doorknobs.



- We will provide disposable wipes so that commonly used surfaces (for example, doorknobs, keyboards, remote controls, desks, other work tools and equipment) can be wiped down by employees before each use.

WORKSITE PREVENTATIVE MEASURES

We will do the following protective behaviors that reduce the spread of COVID-19 and provide you with the necessary tools for these protective behaviors, including:

- All employees are required to watch Covid-19 Training video prior to returning to office:
- Post CDC information, including recommendations on risk factors at home and in the community
- Provide tissues and no-touch disposal receptacles to minimize exposure to infectious secretions
- Inform employees of the importance of good hand hygiene. Regularly washing hands with soap and water for at least 20 seconds is one of the most effective ways for employees to minimize exposure to COVID-19.
- If soap and water are not readily available, employees should use alcohol-based hand sanitizer that is at least 60% alcohol. If hands are visibly dirty, soap and water should be chosen over hand sanitizer.
- No touch hand sanitizer stations added throughout workplace
- Discourage handshaking and instead encourage the use of other noncontact methods of greeting
- Avoid other employees' phones, desks, offices, other work tools and equipment, and other commonly touched surfaces when possible. If necessary, clean and disinfect them before and after use
- Avoid sharing food utensils and food with other employees
- Encourage and require social distancing to the greatest extent possible while in the workplace
- Encourage employees to minimize ride-sharing. While in vehicles, employees must ensure adequate ventilation
- Provide and encourage use of masks.
- Install plexiglass barriers at our front desks to minimize exposure from coworkers and public
- Provide designated work stations/conference rooms when meeting with clients/vendors.
- We will evaluate our building ventilation system
- Extra cleaning will take place during the week by our cleaning team. However, we expect all employees to clean services in work stations and public areas. If you use public areas, such as kitchens, bathrooms, conference rooms please clean up after yourself by using provided cleaning products.

Social distancing practices once back in the office will include:

- We ask that you maintain proper social distancing (6 to 10ft) from each other when at all possible. We are fortunate that we all have individual offices or areas of work that limit our exposure.
- In-person meetings – we highly encourage using Microsoft Teams and Zoom Virtual meetings whenever possible. Use designated work stations/conference rooms for in person client/vendor meetings. Use appropriate distancing.



- Remote work will still be possible, please work with your department manager to work out what is best for you and the department.
- Delivery of parcels will be limited to business reasons only. Do not have any personal packages delivered to the office. All business deliveries will have a dedicated door/area for drop off.
- We will limit work-related travel. We ask licensing, CE credit education and certification/recertification be done virtually when possible. We will evaluate company meetings, educational business trips, social outings as they arise.

Minimizing exposure to/from clients: Effective July 6th

- Clients/Prospects will be asked to make an appointment. Signs will be placed on doors and on our website/social media pages.
- Clients/Prospects are required to take our health screening prior to entering our buildings. They can take it electronically or by paper. If by paper we will have a table dedicated to this. Pens need to be sanitized after one use. Paper forms will be kept in a separate folder marked confidential. If they take electronically, designated team members will review our online log prior to them entering building.
 - Kalamazoo visitor screening: [Kalamazoo Office visitor Health Screening](#)
 - Otsego visitor screening: [Otsego Office visitor Health Screening](#)
- Clients/Prospects are required to wear mask when in lobby and common areas. Employees will need to wear mask while greeting client/prospect and bringing them back to their office (if can social distance) or common desk w/plex glass or conference rooms. Then you can ask them if they would like you to keep mask on. If you prefer you can wear a mask for your level of comfort or at the request of a client/prospect.
- If you do not have an office where you can social distance (6 feet apart) use a conference rooms or desks w/plexiglass shields.
- Masks will be available for client/prospects
- We are not allowing clients/prospects to use our bathrooms.

Minimizing exposure to/from the visitors/vendors: Effective July 6th

- We prefer to hold meetings virtually vs. in person. Work with your vendors to make this happen.
- Deliveries: they will have to call main office line or knock on door.
- If in person meetings are necessary, we ask that they make an appointment.
- Visitor/Vendors are required to take our health screening prior to entering our buildings. They can take it electronically or by paper. If by paper we will have a table dedicated to this. Pens need to be sanitized after one use. Paper forms will be kept in a separate folder marked confidential. If they take electronically, designated team members will review our online log prior to them entering building.
 - Kalamazoo visitor screening: [Kalamazoo Office visitor Health Screening](#)
 - Otsego visitor screening: [Otsego Office visitor Health Screening](#)
- Visitors/Vendors are required to wear mask when in lobby and common areas. Employees will need to wear mask while greeting visitor/vendor and bringing them back to their office (if can social distance) or common desk w/plex glass or conference rooms. Then you can ask them if they would like you to keep mask on. If you prefer you can wear a mask for your level of comfort or at the request of a visitor/vendor.
- If you do not have an office where you can social distance (6 feet apart) use a conference rooms or desks w/plexiglass shields.



- Masks will be available for visitor/vendors.
- We are not allowing visitors/vendors to use our bathrooms.

If you have any questions regarding this Plan, please don't hesitate to reach out to one of the members of the Management Team.

Stay safe and well!



Nulty Emergency Paid Sick Leave Act – Leave Request Form

Employee Name		Today's Date
Employee Street Address		
City	State	Zip Code

Does your spouse work for this company?

- Yes No

Reason for taking leave (check one):

- I'm currently subject to a federal, state or local quarantine or isolation order related to COVID-19.
- I've been advised by a health care provider to self-quarantine related to COVID-19.
- I'm caring for an individual subject to a quarantine or isolation order.
- I'm experiencing COVID-19 symptoms and seeking a medical diagnosis.
- I'm caring for a child whose school or place of care is closed due to COVID-19.
- I'm experiencing any other substantially similar condition specified by the U.S. Department of Health and Human Services.

Are you unable to work or telework due to the reason you specified?

- Yes No

Please complete the following section if your leave request is based on a quarantine order or self-quarantine advice.

Please provide the name of the governmental entity ordering quarantine or the name of the health care professional advising self-quarantine. If the person subject to quarantine or advised to self-quarantine is not you, provide that person's name and your relation to the person:

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Please complete the following section if your leave request is based on a school closing or child care provider unavailability.

Please provide the name and age of the child (or children) to be cared for, the name of the school that has closed or place of care that is unavailable, and a representation that no other person will be providing care for the child during the period for which you are receiving family medical leave. With respect to your inability to work or telework because of a need to provide care for a child older than 14 during daylight hours, please provide a statement that special circumstances exist requiring the employee to provide care:

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Please complete the following section if leave will be taken continually or for the entire period.

Date leave will begin:

Date of return to work:

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Please complete the following section if leave will be taken intermittently (for permitted reasons and as agreed to by).

Schedule of needed time off:

--

Employee Signature

Date

--	--

Manager Signature

Date

--	--



Nulty Emergency Family and Medical Leave Expansion Act – Leave Request Form

Employee Name

--

Employee Street Address

--

City

State

Zip Code

--	--	--

Does your spouse work for this company?

- Yes No

Reason for taking leave (check one):

- The birth and care of my newborn child or placement of a child with me for adoption or foster care.
- To care for my spouse, child or parent who has a serious health condition, including COVID-19.
- To care for my child whose school or child care facility has been closed due to COVID-19.
- My own serious health condition, including COVID-19, that makes me unable to perform at least one of the essential functions of my job.
- To care for my spouse, child, parent or next of kin who is a covered service member with a serious injury or illness.
- A qualifying exigency because my spouse, child or parent is a military member on covered active duty or call to covered active duty status.

Please complete the following section if leave will be taken continually or for the entire period.

Date Leave Will Begin:

Date of Return to Work:

--	--

Please complete the following section if leave will be taken intermittently.

Schedule of needed time off:

--

Employee Signature

Date

--	--

Manager Signature

Date

--	--

Note: You must seek approval from the Company for intermittent or reduced schedule leave for the birth or placement of a child for adoption or foster care.



The CARES Act provides \$2.2 trillion in federal funding to address the COVID-19 crisis, making significant changes to employer-sponsored benefits:



Expansion of Testing Coverage

Expands the types of coronavirus testing that comprehensive private health insurance plans must cover without cost-sharing or barriers under the FFCRA.



Telehealth

Allows telehealth and other remote care services to be covered under a high deductible health plan (HDHP) before the deductible is met, without affecting the HDHP's compatibility with Health Savings Accounts (HSAs).



Paid Leave

Clarifies and modestly amends the FFCRA, including granting emergency family and medical leave eligibility to employees who were laid off by an employer after March 1, 2020, had worked for the employer at least 30 of the last 60 days before the layoff, and have since been rehired.



Unemployment Insurance Expansion

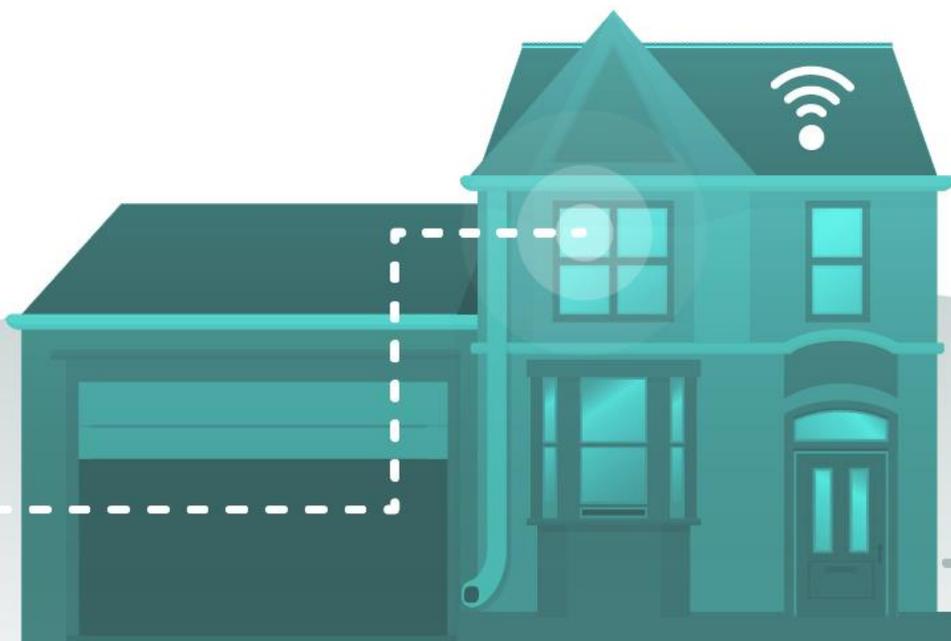
Expands eligibility for unemployment insurance and provides unemployed individuals with an additional \$600 per week on top of the unemployment amount determined by each state.



Student Loan Repayment

Employers may provide a student loan repayment benefit to employees on a tax-free basis of up to \$5,250 annually towards an employee's student loans.

National Coronavirus Guidelines for Americans



Stay home if:



You feel sick.
This applies to adults and children.



Someone in your home tested positive for the coronavirus.
Keep the entire household home.



You have a serious underlying health condition.



You are an older person.



You have the ability to work from home.

Follow the directions of your state and local authorities.

For more information, visit: **CORONAVIRUS.GOV**

Step Away for Safety

To limit the spread of coronavirus disease 2019 (COVID-19), the government is asking everyone to practice social distancing.

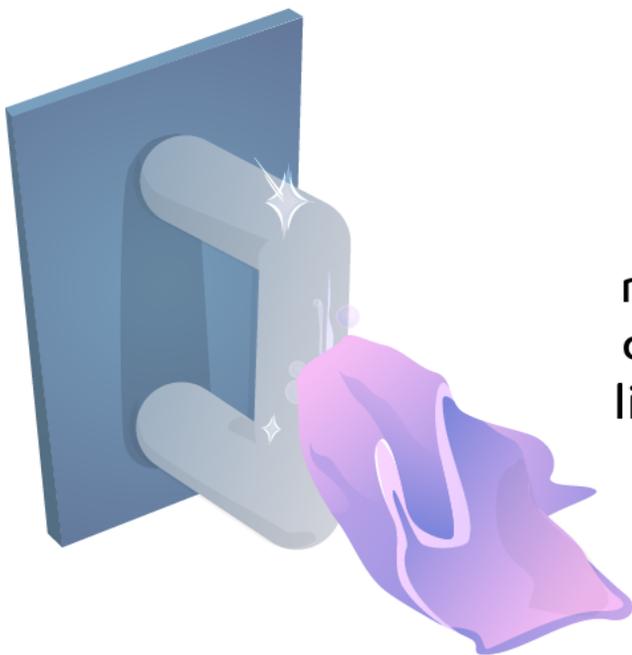


This means staying at least **6 feet** away from everyone at all times. All people should follow this guidance—not just those experiencing COVID-19 symptoms.

Visit [cdc.gov/COVID-19](https://www.cdc.gov/COVID-19) for more information.

Keep Surfaces Clean to Kill COVID-19

Coronavirus disease 2019 (COVID-19) can spread easily through shared surfaces. Be sure to clean and disinfect objects regularly to limit the spread of germs.

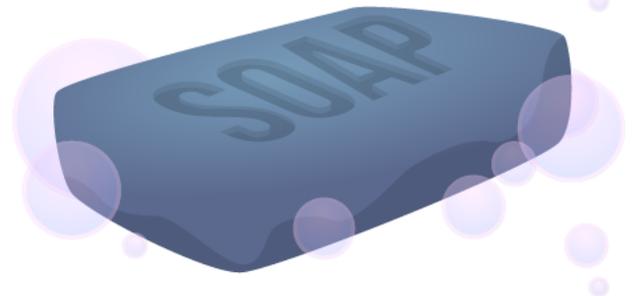


What should I disinfect?

Disinfect anything people regularly touch. Examples include doorknobs, toilet flushers, desks, light switches, computer mice and chair armrests.

How should I disinfect?

Use any product approved by the EPA to kill coronaviruses (check the label to be sure). Otherwise, you can use a diluted bleach solution. Read all product labels for more information on proper use.



10 Ways to Protect Against Coronavirus

The coronavirus disease 2019 (COVID-19) pandemic isn't slowing down. Here are **10 ways** you can protect yourself.

1) Wash your hands often, for at least 20 seconds at a time.

2) Avoid touching your face.

3) Practice social distancing by staying at least 6 feet away from people.

4) Cover your coughs and sneezes.

5) Stay at home whenever possible, even if you don't feel sick.

6) Clean and disinfect frequently touched objects.

7) Avoid public transportation and trips out of your home.

8) Follow organizational guidance when it comes to school or workplace closures.

9) Call your doctor if you have a fever, cough and shortness of breath.

10) Keep up with current virus information at [cdc.gov/COVID-19](https://www.cdc.gov/COVID-19).