



# Nulty CO-19 Preparedness and Response Plan

KALAMAZOO  
OTSEGO  
BUCHANAN  
IRON MOUNTAIN

# Table of Contents

MULTI-COVID-19 PREPAREDNESS AND RESPONSE PLAN:.....	2
COVID-19 WORKPLACE COORDINATOR .....	2
RESPONSIBILITIES OF MANAGERS .....	2
RESPONSIBILITIES OF EMPLOYEES.....	2
REMOTE WORK POLICY: .....	3
DISPLAYING COVID-19 SYMPTOMS .....	4
TEST POSITIVE OR CLOSE CONTACT .....	4
KALAMAZOO COUNTY COVID-19 Quarantine and Isolation Calculator .....	4
CLOSE CONTACT DEFINITION: .....	6
FULLY VACCINATED INFO: .....	6
OTHER DEFINITIONS:.....	6
WORKSITE PREVENTATIVE MEASURES.....	7
National Coronavirus Guidelines for Americans Poster.....	10
Social Distancing Poster.....	11
Keep Surfaces Clean to Kill COVID-19 – Poster .....	12
10 Ways to Protect Against Coronavirus - Poster .....	13



## 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 State of Michigan, CDC and other government entities and is subject to change based on further information and guidance. 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 and at home. 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.

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:

- Sore throat
- Fever 100.4 and above
- A new uncontrolled cough that causes difficulty breathing
- Diarrhea
- Vomiting
- Abdominal pain
- Muscle Aches
- New onset of a severe headache
- New loss of taste or smell

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. See Updated Close Contact definition on Page 5.

## **REMOTE WORK POLICY:**

On November 20, 2020, in accordance with MIOSHA's Emergency Rules Executive Rule 5(8) we developed, educated and distributed our Nulty Covid-19 Remote Work Policy and Remote Work Determination Spreadsheet to all of our team members. All team members are asked to sign and return to HR.

In summary, all employees are expected to work remotely unless they meet certain justifications outlined in our Remote Work Determination spreadsheet.

Nulty Insurance will follow these guidelines, until informed of change.



## DISPLAYING COVID-19 SYMPTOMS

Effective June 1, 2020 all employees must take the “daily” self-assessment symptom questionnaire prior to coming to the office. We will take this questionnaire until further notice (questionnaire updated October, 2020). [Daily Workplace Health Screening - Nulty Insurance](#)

If you are displaying any symptoms of Covid-19 you are to go home immediately or stay home. If possible, you can work remotely. Again, symptoms are:

Primary symptoms of COVID-19 may include the following:

- Sore throat
- Fever 100.4 and above
- A new uncontrolled cough that causes difficulty breathing
- Diarrhea
- Vomiting
- Abdominal pain
- Muscle Aches
- New onset of a severe headache
- New loss of taste or smell

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.

If someone is displaying symptoms while at the office they will be asked to immediately go home.

## TEST POSITIVE OR CLOSE CONTACT

On December 29, 2020, Governor Gretchen Whitmer signed into law Enrolled Senate Bill 1258 (the “Act”) which takes effect immediately.

Among other things, the Act resolves inconsistencies between PA 238 and current guidance from the Centers for Disease Control and Prevention (CDC) relating to how long an individual should quarantine after coming into contact with someone who is COVID-19 positive. Since MIOSHA and the Department of Health and Human Services (DHHS) also follow the CDC guidance, the new law will harmonize the law with how those agencies are viewing employees who are returning to work.

## KALAMAZOO COUNTY COVID-19 Quarantine and Isolation Calculator

Please visit this link to determine your quarantine or isolation timeline:

<https://www.kalcounty.com/hcs/covid19calculator.php>



**For those who test positive for COVID-19:** the Michigan Senate Bill 1258 (the Act) now provides that an employee must not report to work until “they are advised by a health care provider or public health professional that they have completed their isolation period,” or, all of the following are met:

- If the employee has a fever, 24 hours have passed since the fever has stopped without the use of fever-reducing medications.
- The isolation period has passed.
- The employee’s principal symptoms of COVID-19 have improved.
- If the employee has been advised by a health care provider or public health professional to remain isolated, the employee is no longer subject to such advisement.
- Review Kalamazoo County link above to help determine your isolation/quarantine period. Employees who live outside of Kalamazoo County, please use this link as well.

**For those with the principal symptoms of COVID-19 but who have not yet tested positive,** the Act provides that an employee shall not report to work until one of the following are met:

- A negative diagnostic test result has been received.
- ALL OF THE FOLLOWING APPLY:
  - The isolation period has passed since the principal symptoms of COVID-19 started.
  - The employee’s principal symptoms of COVID-19 have improved.
  - If the employee had a fever, 24 hours have passed since the fever subsided without the use of fever reducing medication.
- Review Kalamazoo County link above to help determine your isolation/quarantine period. Employees who live outside of Kalamazoo County, please use this link as well.

**For those employees who have had close contact with an individual who tests positive for COVID-19,** the Act provides that the employee shall not report to work until one of the following is met:

- The quarantine period has passed since the employee last had close contact with the individual.
- The employee is advised by a health care provider or public health professional that they have completed their period of quarantine.
- Review Kalamazoo County link above to help determine your isolation/quarantine period. Employees who live outside of Kalamazoo County, please use this link as well.

Importantly, the Act eliminates any quarantine requirement for employees who had close contact with someone who merely has symptoms of COVID-19. Those employees can continue to report to work.



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

## CLOSE CONTACT DEFINITION:

On December 2, 2020 the Centers for Disease Control and Prevention (CDC) issued new guidance on when individuals should quarantine after potential exposure to the coronavirus. As it has consistently done throughout the pandemic, the CDC recommends that people should quarantine after they have been in “close contact” with someone who has COVID-19. On December 29, 2020 the Michigan Senate Bill 1258 (the Act) matches this definition.

Under the new guidance, individuals have been in “close contact” with someone who has COVID-19 if:

- They were within six feet of someone who has COVID-19 for a total of 15 minutes or more; including brief encounters in a 24-hour period totaling 15 minutes or more.
- They provided care at home to someone who is sick with COVID-19;
- They had direct physical contact with the person (hugged or kissed them);
- They shared eating or drinking utensils with someone who has COVID-19; or
- Someone with COVID-19 sneezed, coughed or got respiratory droplets on them.

## FULLY VACCINATED INFO:

**Fully Vaccinated Individuals (not experiencing symptoms) are exempt from the mandatory State required 14-day quarantine for close contacts of Covid-19 cases:**

On April 5, 2021 the MDHHS has created an exception to quarantine requirements for fully vaccinated individuals. The 14-day quarantine exception only applies to individuals not experiencing COVID-19 symptoms and who have been fully vaccinated. The definition of fully vaccinated depends on the type of vaccine received. Individuals receiving the two-dose Pfizer or Moderna vaccine series are not considered fully vaccinated until two weeks after the second dose. Individuals receiving the Johnson & Johnson vaccine are considered fully vaccinated two weeks after receiving the vaccine. We may request employees to provide proof of fully vaccinated status. We may request to see the employees COVID-19 Vaccination Record to confirm exemption from quarantine.

All state requirements to wear a mask still apply – so plan on wearing a mask in all public settings.

You can review the MDHHS FAQs at this link: [the FAQs issued by MDHHS](#)

## OTHER DEFINITIONS:

Michigan Senate Bill 1258 expands on definitions:



- **“Infected with COVID-19”** which means “displaying the principal symptoms of COVID-19 or having tested positive for COVID-19 prior to the end of the isolation period.”
- **“Isolation Period”** which means “the recommended number of days that an individual be in isolation after the individual first displays the principal symptoms of COVID-19 as prescribed” in the CDC guidelines.
- **“Quarantine Period”** which means “the recommended number of days that the individual be in quarantine after the individual is in close contact as prescribed” in the CDC guidelines.

Review Kalamazoo County link above to help determine your isolation/quarantine period. Employees who live outside of Kalamazoo County, please use this link as well.

Employee will need to work with their manager on an appropriate return to work timeline.

## WORKSITE PREVENTATIVE MEASURES

**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.

**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 or upon hire date. Covid-19 Training video is located on our “F” Drive.
- 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.
- Upgrading our ventilation system in both Kalamazoo and Otsego location
- 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 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 delivers 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 6, 2020 all Clients/Prospects/Visitors 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. Our questionnaires were updated October, 2020.
  - Kalamazoo visitor screening: [Visitor Health Screening \(Kalamazoo\)](#)
  - Otsego visitor screening: [Visitor Health Screening \(Otsego\)](#)
  - Southwest visitor screening: [Visitor Health Screening \(Southwest\)](#)
- Effective July 13, 2020 all Employees/Clients/Prospects/Visitors are required to wear mask when in lobby and common areas: hallways, restrooms, conference rooms, training rooms, etc. until further notice. If you have a client/prospect/visitor you are to remain wearing your masks the entire time of their visit where ever you are meeting with them.



- 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 are still required.
- 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 6, 2020: 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. Our questionnaire will be updated October, 2020.
  - Kalamazoo visitor screening: [Kalamazoo Office visitor Health Screening](#)
  - Otsego visitor screening: [Otsego Office visitor Health Screening](#)
- Effective July 13, 2020 Employees/Visitors/Vendors are required to wear mask the entire time of their visit.
- 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!



# 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.

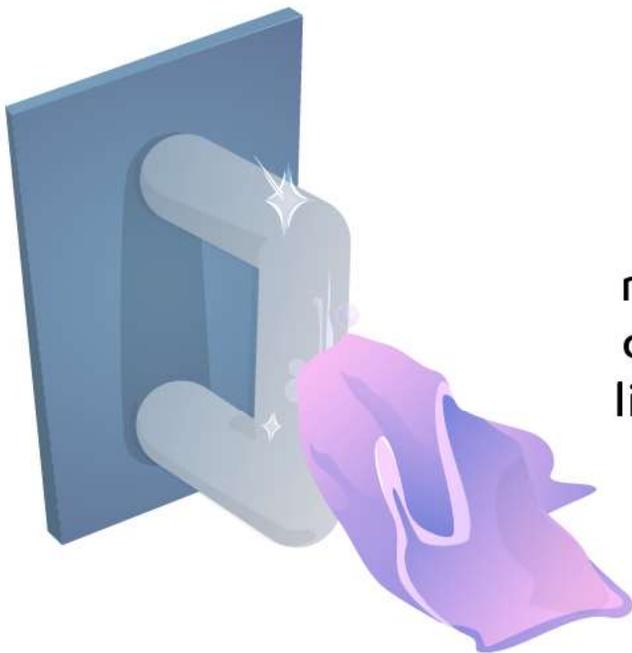


This means staying at least **6 feet** away from everyone at all times. All people should follow this guidance—not just those experiencing COVID-19 symptoms.

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).**