

**Benzie Conservation District**  
**COVID-19 and Virus Pandemic Preparedness and Response Plan**

Approved by the Benzie Conservation District Board of Directors and implemented on

\_\_\_\_\_ March 2020 \_\_\_\_\_

This Preparedness Plan was developed in compliance with the Governor Whitmer's [Executive Order 2020-97](#) and [Executive Order 2020-114 \(COVID-19\) \(June 5, 2020\)](#) to ensure the safety and health of the Benzie Conservation District (henceforth referred to as "the District") staff and clients, while continuing to provide technical services in office and via site visits. The District has been deemed a lower-to-medium risk entity by its leadership, based on staffing levels, office layout, common client interactions and field activities. The District protocol follows those of the Natural Resources Conservation Service (NRCS) and was largely compiled using guidance from the resources below:

- NRCS bulletin EO 2020-110: ENG-COVID-19 Travel and Onsite Activity Requirements
- USDA's Reopening Playbook

In addition, the following resources were also referenced to prepare this plan:

- [Michigan Chamber of Commerce](#), Preparedness Plan Guidance from Bodman Team
- [Michigan.gov/coronavirus](#) Guidance to protect construction workers
- OSHA Guidance on [Preparing Workplaces for COVID-19](#)
- CDC Guidance on [proper hygiene, cleaning and disinfecting](#)

### **Employer Responsibilities:**

The District will provide Personal Protective Equipment (PPE) such as gloves and face masks as appropriate for the activity being performed as well as disinfectants and hand sanitizer.

### **Office Location Precautions:**

District staff will maintain 1-2 staff in the office per day to maintain a basic level of client services via phone, e-mail and mail, continue essential operations of the District. District staff may use flexible work hours, wherever possible, to limit the number of employees simultaneously working on-site. Telework should be maintained for employees who have self-certified to their higher risk for COVID-19 based on CDC guidelines. Caregiving situations will be taken into consideration when determining continued telework options for staff.

To be eligible for in-person work, an employee must self-certify that they are healthy and meet the following criteria:

- Employees who do not display COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting, whether accompanied by a formal COVID-19 diagnosis;
- Employees who, in the last 14 days, have not had close contact with and/or live with any person having a confirmed COVID-19 diagnosis; and
- Employees who, in the last 14 days, have not had close contact with and/or live with any person displaying COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting.

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

Any health-related information and documentation gathered from employees is maintained confidentially and in compliance with state and federal law. Specifically, medical documentation is stored separate from employees' personnel documentation.

### **Employee Expectations:**

District Employees are expected to minimize COVID-19 exposure by:

- Cleaning high-touch surfaces (doorknobs, switches, shared spaces) at end of each shift;
- Cleaning workstations at beginning and end of each shift. Avoiding, when possible, the use of other employees' phones, desks, offices, or other work tools and equipment;
- When sharing or reviewing work with co-workers, employees should leave materials for review in the co-worker's space or otherwise maintain 6' social distancing, and wear masks or (PPE) when working in close proximity;
- Frequently washing hands with soap and water for at least 20 seconds;
- Using hand sanitizer when soap and water are unavailable;
- Avoiding touching their faces with unwashed hands;
- Avoiding handshakes or other physical contact;
- Avoiding close contact with sick people;
- Practicing respiratory etiquette, including covering coughs and sneezes;
- Immediately remedying unsafe or unsanitary conditions on District premises;
- Closing/ avoiding common areas and break areas;
- Complying with District's self-monitoring screening processes (below);
- Seeking medical attention and/or following medical advice if experiencing COVID-19 symptoms; and
- Complying with self-isolation or quarantine orders.

### **Client Interactions:**

Where mission delivery requires in-person client interaction:

- Restrict visitors to essential, time-sensitive, scheduled visits only;
- Identify and implement any on-site activities that can be accomplished with offsite alternatives;
- Meet visitors outside when possible or limit their access to front counter only;
- Staff and clients must adhere to the community PPE, hygiene, and social distancing guidelines;
- Clients are required to wear their own masks and follow on-site safety procedures (or will be provided with a mask if necessary).

### **Field Work Precautions:**

- Determine if activity is essential or if it can be deferred to a later time;
- Schedule and coordinate on-site activity if possible when others (landowner, contractor, etc.) are not present or are at a different area at the job site from where you need to work;
- Go over on-site activities and expected social distancing requirements with the landowner and contractor before visit or project starts. Have an understanding that onsite work constraints may create some delays. Make clear that if constraints are not followed, staff will, after informing the landowner of improper behavior, leave the site if behavior is not corrected;
- Practice social distancing (6' distance from others, minimize group sizes to under 10 attendees);
- Ask others to step back from the work area when you need to closely inspect any work;

- Do not travel or be on-site without PPE and supplies for disinfecting and cleaning. This includes face masks, hand sanitizer and disinfectant wipes. Only use alcohol based (>70%) disinfectant solutions on survey equipment (no ammonia);
- Minimize sharing equipment, staff will use District equipment instead of using a contractor's or landowner's equipment. Use disinfectant on any shared equipment before giving to someone else. Use hand sanitizer, or wash hands if possible, after handling any shared equipment. When traveling, use hand sanitizer or wash hands after using or handling items accessible to the public (gas pumps, credit card readers, etc.);
- Equipment and vehicles must be disinfected after use.

### **Supplemental Measures Upon Notification of Employee's COVID-19 Diagnosis and/or Symptoms**

An employee with a COVID-19 diagnosis or who displays symptoms consistent with COVID-19 must be immediately removed from the worksite.

In response to a confirmed diagnosis or display of COVID-19 symptoms, the District will:

- Inform all employees with and near whom the diagnosed/symptomatic employee worked of a potential exposure;
- Keep confidential the identity of the diagnosed/symptomatic employee; and
- Conduct deep cleaning of the diagnosed/symptomatic employee's workstation, as well as those common areas potentially infected by the employee.

All employees who worked in sustained, close proximity to the diagnosed/symptomatic employee are also removed from the worksite for at least 14 days; however, should these exposed employees later develop COVID-19 symptoms and/or receive a confirmed diagnosis, they may not report on-site until all return-to-work requirements are met, defined below.

District completes an OSHA Form 300, as well as a Form 301, "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.

Such employees may only resume in-person work upon meeting all return-to-work requirements, defined below.

### **Daily Screenings**

To prevent the spread of COVID-19 and reduce the potential risk of exposure, employees are asked to self-monitor using the following questions before entering the worksite:

1. Are you currently suffering from any of the following symptoms – fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting?
  - a. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until employee is permitted to return to work as defined below.
2. Have you lived with, or had close contact with, someone in the last 14 days diagnosed with or displaying the symptoms of COVID-19?
  - a. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until at least 14 days after the close contact.
3. Have you travelled via airplane internationally or domestically in the last 14 days?
  - a. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until at least 14 days after the international or domestic travel.

Employees who develop symptoms during their shift must immediately report to their supervisor and/or Human Resources/Personnel Committee.

### **Return-to-Work Requirements**

Employees who were themselves diagnosed with COVID-19 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 non-test-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); **and**
- Negative results of an FDA Emergency Use Authorized molecular assay for COVID-19 from two consecutive nasopharyngeal swab specimens collected at least 24 hours apart.

Under the non-test-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); **and**
- At least 7 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 either 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, the District may accept written statements from employees confirming all the factors supporting their release.

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

Employees may be eligible for paid and unpaid leaves of absence. Employees may be permitted to use available paid time-off provided under the District's policy concurrently with or to supplement any approved leave.

#### **a. FFCRA**

Employees may qualify for two different types of paid leave under the Families First Coronavirus Response Act ("FFCRA").

Under the Emergency Paid Sick Leave Act ("EPSLA"), employees may seek up to two weeks (i.e., 10 business days) of paid leave for the following reasons:

1. Subject to a Federal, State, or local quarantine or isolation order related to COVID-19;
2. Advised to self-quarantine due to concerns related to COVID-19;
3. Experiencing symptoms of COVID-19 and seeking a medical diagnosis;
4. Caring for an individual subject to a quarantine or isolation order or advised to self-quarantine due to concerns related to COVID-19;

5. Caring for a son or daughter whose school or childcare provider is closed or unavailable due to COVID-19 precautions; and
6. 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. (Please note, the Secretary of Health and Human Services has not defined conditions which trigger this subpart under the EPSLA.)

For full-time employees, two weeks of leave equates to 80 hours; for part-time employees, two weeks of leave equates to a number of hours equivalent to the number of hours usually worked in a two-week period.

Paid leave for reasons 1, 2, and 3, above, is paid at the employee's regular rate of pay, capped at \$511/day. Paid leave for reasons 4, 5, and 6, above, is paid at a rate equivalent to two-thirds of an employee's regular rate of pay or minimum wage, whichever is greater, capped at \$200/day. Under the Emergency Family and Medical Leave Expansion Act, employees may seek up to twelve weeks of leave to care for a son or daughter whose school or childcare provider is closed or unavailable due to COVID-19 precautions. The first two weeks of leave, which run concurrently with the EPSLA leave, may be unpaid; the remaining ten weeks of leave are paid at a rate equivalent to two-thirds of an employee's regular rate of pay or minimum wage, whichever is greater, capped at \$200/day.

**b. Executive Order 2020-36**

Employees who require leave beyond the EPSLA 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 under Executive Order 2020-36 until permitted thereunder to return to work.

**c. Unemployment Compensation Benefits**

Under Executive Order 2020-57, and 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 are referred to Human Resources for information on unemployment compensation benefits. Such reasons include the following:

1. Being under self-isolation or self-quarantine in response to elevated risk from COVID-19 due to being immunocompromised;
2. Displaying at least one of the principal symptoms of COVID-19 (i.e., fever, atypical cough, atypical shortness of breath);
3. Having close contact in the last 14 days with a confirmed COVID-19 diagnosis;
4. Needing to care for someone with a confirmed COVID-19 diagnosis; and
5. 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).

#### **d. FMLA and ADA**

Employees may be entitled to unpaid leave under the Family and Medical Leave Act (“FMLA”) if their absence is related to their own serious health condition or that of a family member.

COVID-19 may constitute a serious health condition where “complications arise.”

The District is also mindful of its obligations under the Americans with Disabilities Act (“ADA”). Specifically, if an employee requests an accommodation because of a condition that may be complicated by COVID-19 (e.g., cystic fibrosis, emphysema, COPD), then the District engages in the interactive process to provide a reasonable accommodation. This may mean allowing the employee to work remotely (if reasonable) or work an alternative schedule.

#### **Plan Updates and Expiration**

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

This Plan will expire upon conclusion of its need, as determined by the District and in accordance with guidance from local, state, and federal health officials.