COVID-19 Preparedness, Response and Safe Workplace Plan

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Allegan County Community Mental Health Services
COVID-19 Preparedness, Response and Safe Workplace Plan

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COVID-19 Preparedness and Response Plan

In order to respond to the current state of emergency related to the novel coronavirus (“COVID-19”) and to comply with relevant state and local orders related to COVID-19, Allegan County Community Mental Health Services (ACCMHS) in conjunction with administration of Allegan County has prepared the following COVID-19 Preparedness and Response Plan (“Plan”), and provides detailed information for each area of agency operation. This Plan may be updated by the Management Team throughout the phases of the COVID-19 pandemic and as needed when required by new or revised state and local orders.

SECTION 1: ESSENTIAL WORKERS NECESSARY TO PERFORM CRITICAL INFRASTRUCTURE FUNCTIONS

Executive Order 2020-110 relaxed previous orders by the Governor that prohibited operations that required workers to leave their homes except to the extent those workers are necessary to sustain or protect life (i.e., critical infrastructure workers) or to conduct minimum basic operations. ACCMHS employees are designated by the agency’s Executive Director as “critical infrastructure workers” as described by the U.S. Cybersecurity and Infrastructure Security Agency in its March 19, 2020 guidance as well as additional categories of such workers identified by Governor Whitmer in the Executive Orders. A letter documenting the status of agency employees as such was distributed to all employees on March 23, 2020.

With the release of Executive Order 2020-110, work that can be done remotely must continue to be done remotely. The order further specifies that “Michiganders must continue to wear face coverings when in enclosed public spaces and should continue to take all reasonable precautions to protect themselves, their co-workers, their loved ones, and their communities. Indoor social gatherings and events of more than 10 people are prohibited.” Thus, ACCMHS employees may continue to perform in-person activities so long as any in-person work is performed consistent with Executive Order 2020-97 (“Safeguards to Protect Michigan’s Workers from COVID-19”).

SECTION 2: PROTECTIVE SAFETY MEASURES

Remote Working Conditions

All employees who are not essential to work on site, and whose job duties reasonably allow them to work remotely, will do so under the following parameters:

- Staff remains available for work.
- Staff reports for work at their normal designated times from their home location, unless otherwise directed.
- Employees assist in supporting the work of other service areas if their own workload becomes limited as directed by supervisor/manager/director.
- If all employee assignments or supportive workloads are not sufficient to fill an employee’s schedule, employees are expected to participate in online education and development, such as:
  - Relias platform - annually required trainings (and completing ahead of schedule)
  - KnowBe4
- All employees are to stay in contact with their supervisor and if time availability exists, they are to offer assistance to their program and the agency in general through a number of review and planning tasks that normal business times do not always allow for.

Examples include:
  - Developing or reviewing standard operating policies and procedures for daily tasks;
  - Developing or updating strategic plan implementation opportunities;
  - Supporting departmental training needs (e.g., manuals and training materials)
  - Researching ideas to create efficiency in our processes or improve delivery of service;
Reviewing email accounts for emails that can be deleted or need to be filed elsewhere, organizing and maintaining electronically stored files in employee, departmental and other shared storage locations, and many more tasks that often get cast aside in our daily work. Employees in need of assistance, such as training or templates, to conduct any of these tasks may contact their supervisor, manager or program director.

- If supervisors and employees in good faith meet the above criteria, employees shall receive pay for their normal work schedule. Employees are to put in working hours as normal and use Admin Leave time to supplement (up to 40 hours per week).
- If employees do not wish to be available for work, they are to follow the normal process for requesting and recording leave; unpaid time could apply if due to special circumstances.

**Employee Screening Before Entering the Workplace**

To protect health and safety in the workplace the following mandatory employee monitoring process is in effect:

1. Each day an employee is required to report in-person, the employee shall complete the screening form; **APPENDIX B** at home, before reporting into work. Employees working remotely, at home, may elect to track their information daily using the screening form; however, they are not required to submit the form if not reporting in-person.
2. The screening questions are to be answered in consideration to new or worsening symptoms. In any case where an employee is experiencing a new symptom or existing symptom that may normally be expected and has suddenly become worse, the employee shall answer “yes” to such symptom.
3. In the event the employee has an existing condition that may explain the presence of a symptom regularly experienced, the employee may answer “no”.
   a. Example 1: Diarrhea in connection with Crohn’s disease, irritable bowels, lactose intolerance, etc.
   b. Example 2: Chronic cough due to a certain blood pressure medication.
   c. Example 3: Runny nose or congestion due to chronic allergies.
4. If an employee answers “yes” to any of the symptoms or has a temperature greater than 100.4 degrees Fahrenheit:
   a. The employee is to stay home and immediately contact their supervisor.
   b. The employee should contact a health provider via telemedicine (If covered by Priority Health, call (844) 322-7374 for telemedicine access) for additional guidance.
   c. The employee shall keep their supervisor updated on their status.
   d. Immediately upon receiving initial notification from the employee that they answered “yes” for a symptom or had temperature greater than 100.4 the supervisor shall contact Human Resources for further instruction and guidance on the appropriate leave type options.
   e. If the employee is identified as probable or confirmed for COVID-19, the supervisor and employee shall reference the EMPLOYEES WITH PROBABLE OR CONFIRMED COVID-19 CASES section of this plan.
   f. In the event an employee has not sought guidance from a health provider within 72 hours of answering “yes” to a symptom or having a temperature, ACCMHS may require the employee to get an evaluation from a health provider of its selection.
   g. In all cases, the employee may not return to work until the conditions of **APPENDIX C “Return to Work”** are met.
5. If employee answers “no” to all questions, the employee is to email (hr@accmhs.org) the completed form (or provide a paper copy) to the HR department for tracking. Any questions or concerns HR will forward them to the Integrated Health Director for clinical review.
6. Currently, temperatures are not required to be taken at the ACCMHS door; however, employees are strongly encouraged to take their temperature at home if they have access to any type of non-mercury medical thermometer. If organization wide spread of the COVID-19 virus occurs, ACCMHS may transition to requiring a temperature to be taken.

7. Employees are reminded to follow all hygiene and social distancing precautions outlined within this plan.

8. If an employee is considering travel for personal reasons or receiving visitors in their homes from out of state, that employee is to contact healthsafety@accmhs.org at least one week prior to the occurrence. Directions on potential quarantine applicable to their travel plans will be provided. These specific scenarios will be directed through conversation through HR, Medical Director and Director of Integrated Health as warranted.

**Personal Protective Equipment**

ACCMHS shall provide and make available to all workers performing in-person work, personal protective equipment (PPE) such as gloves, goggles, face shields, face masks and physical barriers (such as clear plastic sneeze guards) as appropriate for the activity being performed by the worker. Any in-person worker able to medically tolerate a face covering, must wear a covering over his or her nose and mouth when in any enclosed public space. Organizational PPE and cleaning supplies may be obtained through the Health and Safety committee.

A. **General Mask Protocol for Staff**

1. At a minimum, when on-site at ACCMHS, all staff must wear a cloth mask or face covering at all times while in common areas, shared spaces, or when not able to maintain six feet of separation from others.

2. All staff coming on-site to ACCMHS will be provided a surgical mask at screening for use while on-site. One surgical mask per shift or per day will be provided by ACCMHS.

3. Unless otherwise required through established protocol as noted below, staff may choose to wear their own cloth face covering instead of the provided surgical mask. Cloth masks or face coverings worn by staff must adhere to CDC guidelines; if not, then an agency-provided surgical mask must be worn.

4. If a staff member has their own N-95 mask and wishes to wear it in place of the agency-provided surgical mask, they may do so in any setting in which a cloth mask/face covering would be permitted.

5. If a staff member is unable to wear a mask or face covering for medical reasons, they will need to contact Human Resources to request a reasonable accommodation under the Americans with Disabilities Act.

B. **General Mask Protocol for Consumers/Visitors**

1. Consumers or visitors to ACCMHS facilities will be asked to adhere to CDC and State guidance and wear, at a minimum, cloth face coverings when in common areas, shared spaces, or when not able to maintain six feet of social distancing, unless the consumer or visitor is unable to wear a mask for medical reasons.

2. When meeting in the community, consumers and those participating in meetings will be asked to wear, at a minimum, cloth face coverings when in common areas, shared spaces, or when not able to maintain six feet of social distancing, unless the consumer or other meeting participant is unable to wear a mask for medical reasons.

3. Consumers, visitors, or participants in community or who do not have a face covering of their own will be asked to wear a surgical mask provided by ACCMHS.

4. A mask should never be placed on anyone who is unable to remove it themselves. Consumers and visitors, including young children, who are unable to remove a mask on their own should not wear a mask or face covering. Per CDC guidance, masks should never be placed on
children younger than two years. The inability to remove a mask is considered a medical reason not to wear a mask.

5. **Consumer/Visitor/Other Non-Staff Face Covering Refusal:**
   a. Consumers who are at an ACCMHS facility for a clinical reason must be allowed into the building even if they refuse to wear a mask and do not have an articulated medical reason.
   b. Consumers visiting an ACCMHS facility for non-clinical reasons, such as check or prescription pick-up, who refuse to wear a mask should be asked to wait outside the building while alternate arrangements are made to meet the consumer’s needs.
   c. Visitors to an ACCMHS facility who refuse to wear a mask or cloth face covering without a medical reason for this should be asked to leave the building.
   d. Before meeting in-person with a consumer in the community or consumer home, determine the willingness of the consumer and other meeting participants to wear a face covering. If the consumer or other participants refuse to wear a face covering, explain why wearing a mask is important and discuss their concern. If refusal continues, but the consumer and others present do not answer “Yes” to any screening questions, proceed with the in-person meeting and ensure that a social distance of 6-feet is maintained throughout the meeting. Consider consultation with Supervisor or Nursing Staff as needed.
   e. Consumers and visitors may be asked by screeners if they have a medical reason for not wearing a mask or cloth face covering. They may NOT be asked for any further information if they answer affirmatively.

C. **General Mask Protocol – Other**
   In circumstances where agency-provided surgical mask use is required, the following guidance should be followed:
   a. While wearing a mask, do not touch the outside of the mask at any time.
   b. In general, you should put the mask on at the beginning of your shift and leave it in place until the end of your shift.
   c. During your lunch and formal breaks, be sure to eat or drink in areas that are not occupied by other people.
   d. While wearing a mask at work, you should remove it only when absolutely necessary. Do not touch the outside of the mask. If you do, immediately perform hand hygiene.
   e. If you must remove your mask during your shift, place a clean paper towel on a flat surface, then place the mask OUTSIDE SURFACE DOWN onto the paper towel while you are not wearing it. Perform hand hygiene immediately after removing your mask and immediately after re-donning it.
   f. Staff with long hair should consider wearing it pulled back at work. This generally makes donning and doffing (removing) a mask much easier, and it decreases the chances of dragging your hair across the outside of the mask and contaminating your hair.
   g. Surgical mask reuse guidance:
      i. Surgical masks intended for reuse should be carefully removed, folded so that the outside of the mask is touching itself and covering itself, then placed in a paper bag to be reused ONLY by the same staff member. A plastic bag should not be used, as it will not allow the mask to dry out.
      ii. Immediately upon donning a previously used mask or doffing (removing) any mask, staff members should perform hand hygiene.
      iii. If during the course of use of a mask, the mask becomes visibly soiled or difficult to breathe through, the mask should be replaced.
D. Additional Guidance on Cloth Masks/Face Coverings

1. Cloth masks/face coverings do not take the place of surgical masks or N95 masks when current protocols, as above, state that those types of masks are required to be worn.
2. Cloth masks/face coverings are not intended to, nor do they, protect the wearer. They are intended to decrease the spread of respiratory droplets that could contain the COVID-19 virus when the wearer of the mask coughs, sneezes, speaks, or breathes.
3. Safe cloth mask/face covering use guidance:
   a. Put on your mask/cloth face covering when you leave your home and, as much as possible, do not remove it until you return to your home.
   b. If driving in a private vehicle either alone or only with members of your immediate household, you may choose to put on your mask when you leave your vehicle to start work and remove it when you return to your vehicle at the end of your shift.
   c. Do not touch the outside of the mask at any time. If you must remove your mask, you should either place it outside surface down onto a clean paper towel or carefully fold it on itself with the outside surfaces touching, then place it in a paper bag, to prevent spreading potential contamination.
   d. Individuals should be careful not to touch their eyes, nose and/or mouth when removing their cloth mask/face covering and should perform hand hygiene immediately after removing the mask/face covering.
   e. Cloth masks/face coverings should be routinely washed depending on the frequency of use. Preferably, a cloth mask or face covering should be worn only for a single day before it is washed. A washing machine on at least a warm temperature setting with standard detergent should suffice in properly washing a cloth face covering.

Enhanced Social Distancing
While ACCMHS will remain in operation; the organization’s focus is to prioritize everyone’s health and safety in a sustainable way by trying to minimize close contact and spread of germs while continuing to serve the public.

On March 13, 2020, in an effort to decrease the density of staff population in working areas, ACCMHS implemented remote work. Service areas may retain on site staffing levels where necessary to still provide essential services. Employees that are working in the building(s) must work minimum 6 ft. apart as their workspaces allow. ACCMHS will consider physical barriers when necessary in less than 3 ft. distance in shared workspaces.

The agency may post signs on rooms or other areas within the facility that designate numerical limits on simultaneous room occupancy. Employees are expected to follow all posted limits. Supervisors will direct employees to perform their work in such a way so as to reasonably avoid coming within six feet of other individuals. Where possible, employees may be relocated or provided additional resources in order to avoid shared use of offices, desks, telephones, and tools/equipment. Employees should remain in their remote working situations as much as possible until movement from pandemic phase occurs.

Meal and Break Periods - The number of employees permitted in any break areas or shared kitchen/dining areas shall be limited to ensure necessary social distancing restrictions can be adhered to. To the furthest extent possible, schedules shall be staggered to avoid increased traffic in these areas.

Meetings - Any meetings should be done via Zoom or other telecommunication means.

Work related Travel - All nonessential travel, conferences, trainings, etc. shall be suspended or converted to a call-in or online event.

Enhanced Hygiene
On March 10, 2020, the County implemented the following OSHA protocols and building signage was posted within the buildings that ACCMHS occupies;

- Stay home if you are sick.
- Wash hands frequently with soap and water, for at least 20 seconds, or use sanitizer if soap and water are not available.
- Avoid touching nose, mouth and eyes.
- Cover coughs and sneezes with tissues provided (or in elbow rather than hand if a tissue is not available) and dispose of properly
- Wash hands or use hand sanitizer after sneeze or cough.
- Avoid close contact with coworkers and customers (maintain separation of at least six feet).
- Avoid shaking hands and always wash hands after contact with others.
- Avoid using other employees’ phones, desks, offices or other work tools and equipment. Clean all equipment frequently.
- Use email and phones to communicate as much as possible.
- Minimize in person meetings. When meetings are necessary, avoid close contact by keeping separation of at least six feet where possible. Ensure that there is proper ventilation in the meeting room. (i.e. vents are not covered)

Signs regarding proper hand washing methods will be posted in all restrooms. Hand shaking is also prohibited to ensure good hand hygiene.

Enhanced Cleaning and Disinfecting
To assist in limiting the spread of viruses and germs, the County has hired additional custodial resources and increased frequency of schedules to disinfect door handles and hardware, plumbing fixtures, hardware, knobs etc. with hospital grade disinfectant as part of their day to day standard operating procedures. In addition to the existing hand sanitizing stations in services areas, mobile hand sanitizing stations were purchased and placed in public areas near building entrances. Increased signage was placed throughout buildings to provide guidance. On March 24, 2020, County Facilities Management began distributing individual cartons of disinfecting wipes to departments throughout all facilities. County staff continues to work on increasing supply stock and will maintain an emergency stock for future events such as this. Employees are encouraged to continue to use existing standard procedures for work or cleaning requests.

Tools and Equipment
ACCMHS intends to limit the sharing of office equipment among in-person employees. Should any sharing of office equipment be required, employees must disinfect and clean it following their use of same and before any other employee uses the tool or piece of equipment. ACCMHS will provide employees with disinfectant wipes and other disinfecting products suited for the equipment involved. Telephones and computers are the primary equipment that most employees will use. Employees should follow guidelines for good hand hygiene as described above.

SECTION 3: VISITORS (PUBLIC, GUESTS AND CONSUMERS COMING FOR SERVICES)
While ACCMHS will remain in operation; the organization’s focus is to prioritize everyone’s health and safety in a sustainable way by trying to minimize close contact and spread of germs while continuing to serve the public. To the degree possible, visitors/clients that are allowed entry into an ACCMHS facility should be limited by trying to assist individuals over the phone, guiding them to online resources, postponing non-essential visits, etc. When in person services are essential, individuals shall maintain the recommended social distancing protocols.

Screening Questionnaire
Any consumers/visitors receiving ACCMHS services within the community or entering an ACCMHS building will answer the screening questionnaire (APPENDIX B) prior to obtaining services or entering the buildings.

a. ACCMHS will utilize the screening questionnaire.
b. Screening will be completed verbally by consumer or visitor with staff recording the answers on the screening questionnaire unless other methods are required due to consumer or visitor special needs.

c. Each site will have a trained designated screener (can be receptionist, manager, etc.).

d. The designated screener will ask each visitor or consumer entering the building the questions on the screening questionnaire. If the visitor or consumer answers all screening questions “No”, then they will proceed normally. If visitor or consumer does not have an appropriate mask/face covering offer one.

e. If the consumer answers any screening question “Yes”, the ACCMHS staff member will provide guidance on consulting their primary care provider and follow instructions in the section on “Employees and Consumers with Probable or Confirmed COVID-19 Cases”.

No visitor should be allowed in the workplace unless they are deemed essential to address an issue related to critical infrastructure functions.

The completed consumer/visitor screening questionnaire should be routed to healthsafety@accmhs.org.

SECTION 4: APPLICABLE EMPLOYEE BENEFIT CONSIDERATIONS

Sick Leave
The purpose of this section is to provide guidance to employees on the availability of leave benefits that have been newly created by the Families First Coronavirus Response Act, a federal law that became effective on April 1, 2020.

Under the law, employees may be eligible for paid leave for absences that meet certain criteria related to the COVID-19 pandemic, and ACCMHS will provide leave consistent with the federal law. Details are discussed below.

Please contact Human Resources at 269-673-6617 ext. 2731 or nlawrence@accmhs.org for questions or assistance, as needed.

Emergency Paid Sick Leave
Effective April 1, 2020, all regular full-time and part-time employees who are unable to work (or telework) due to one or more of the following reasons related to the outbreak of COVID-19 became eligible to receive up to 80 hours of Emergency Paid Sick Leave (part-time employees are eligible to receive paid leave equal to the average number of hours that the employee works over a 2-week period):

1. The employee is subject to a Federal, State, or local quarantine or isolation order related to COVID-19;
2. The employee has been advised by a health care provider to self-quarantine related to COVID-19;
3. The employee is experiencing COVID-19 symptoms and is seeking a medical diagnosis;
4. The employee is caring for an individual subject to an order described in (1) or self-quarantine as described in (2);
5. The employee is caring for a child whose school or place of care is closed (or child care provider is unavailable) for reasons related to COVID-19; or
6. The employee is experiencing any other substantially-similar condition specified by the Secretary of Health and Human Services.

Pay Rates:
Employees utilizing Emergency Paid Sick Leave for reasons 1, 2, or 3 shall be paid at their regular rate of pay up to a maximum of $511 per day and $5,110 in the aggregate (over a 2-week period).

Employees utilizing Emergency Paid Sick Leave for reasons 4, 5, or 6 shall be paid at 2/3 their regular rate of pay up to a maximum of $200 per day and $2,000 in the aggregate (over a 2-week period).
Public Health Emergency FMLA Leave
Effective April 1, 2020, all regular full-time and part-time employees who have been employed with ACCMHS for at least 30 days prior to beginning leave under this provision became eligible to receive up to 12 weeks of family and medical leave if the employee is unable to work (or work remotely) because the employee needs to care for his or her minor child whose school or place of care has been closed, or whose child care provider is unavailable, due to a COVID-19 emergency declared by a Federal, State, or local authority (part-time employees are eligible for leave for the number of hours that the employee is normally scheduled to work over that 12-week period).

The first 10 days of leave under this provision will be unpaid. However, during the first 10 days, the employee may be eligible to utilize Emergency Paid Sick Leave, as described above, or may choose to be compensated with PTO or Flex time.

For the paid period of expanded family and medical leave, employees will need to take the leave concurrently with existing accrued PTO or Flex.

FMLA leave taken by the employee for other FMLA-qualifying reasons reduces the amount of leave available under this provision.

Pay Rate:
Employees utilizing leave under this provision shall be paid at 2/3 their regular rate of pay up to a maximum of $200 per day and $10,000 in the aggregate (over a 10-week period).

Medical Certification
ACCMHS may require employees seeking leave to provide a medical certification describing the reason(s) the employee requires leave.

Symptoms
Any onsite employee who appears to have a respiratory illness may be separated from other employees and sent home. Employees are encouraged to contact their primary care physician if they are exhibiting the following symptoms:

- Fever
- Cough
- Shortness of breath

Employees who exhibit these symptoms at work may be directed to go home and will be eligible to utilize Emergency Paid Sick Leave for their absence if they are unable to perform their job duties remotely.

Notice
Employees should provide notice of their need for leave as soon as practicable.

Exclusions
The law gives ACCMHS the right to exclude healthcare providers from taking these leaves. Requests for leave by healthcare providers will be considered on a case-by-case basis.

Expiration
The leaves provided under the federal law expire on December 31, 2020, and leave time may not be carried over into 2021.

All other qualified leaves of absences continue to apply. Additional information found on the ACCMHS website under Human Resources.

SECTION 5: EMPLOYEES AND CONSUMERS WITH PROBABLE OR CONFIRMED COVID-19

ACCMHS will contact the Local Health Department of the identified Probable or Confirmed COVID-19 cases (based on residency) to ensure the Local Health Department is aware. There can be delays in the reporting local health departments receive. As such, they will work with the ACCMHS
to identify who else in the organization might be at risk. See attached **APPENDIX C** for workflow of this process.

COVID-19 is considered a specific condition or diagnosis. Due to confidentiality and privacy requirements ACCMHS cannot disclose such information identifying a specific employee. ACCMHS must protect the confidentiality of the employee. Legally, they cannot identify the employee by name. ACCMHS cannot disclose to other staff or third persons the name or other personal or health information of the employee who tested positive for COVID-19 except to the local health department (MCL 333.5111(1)b; HIPAA §164.512(b); R 325.173).

ACCMHS is committed to ensuring a safe working environment and to notifying employees if ACCMHS learns they have been in contact with COVID-19 in the work environment. In any case when an employee tested positive or is diagnosed as a probable, the employee is interviewed and the case investigation is completed for contact tracing purposes in conjunction with local Health Department guidance. Any individuals (including other employees) considered a close contact would then be notified and put on mandated home quarantine. As such, it is best to let employees know that if an employee has been in close contact with a positive COVID-19 employee they would be notified by the local health department and/or the Human Resources department. If they have not been notified they should continue to follow appropriate precautions at all times.

**Probable Cases**
An employee will be considered to have a Probable Case of COVID-19 if:

- They are experiencing any of the following COVID-19 symptoms:
  - Cough
  - Shortness of breath
  - Difficulty breathing
  **OR**

- They are experiencing at least two of the following symptoms:
  - Fever
  - Chills
  - Repeated shaking with chills
  - Muscle pain
  - Headache
  - Sore throat and/or
  - New loss of taste or smell
  **AND**

- They have been exposed to a COVID-19 positive person, meaning:
  - An immediate family member has tested positive or is a probable case of COVID-19; or
  - In the last 14 days, the employee came in close contact with someone who has tested positive for COVID-19.

If an employee believes or has been told by the Local Health Department that he or she qualifies as a Probable Case (as described above), he or she must:

- Immediately notify supervisor and Human Resources contact;
- Self-isolation for 10 days from onset of symptoms; and
- Seek immediate medical care or advice.

If an employee qualifies as a Probable Case, then ACCMHS will work with their Local Health Department:

- Notify all employees who have been identified as a close contact (being within approximately six feet for a prolonged period of time without PPE) with the employee two days before their onset of symptoms (while not disclosing the identity of the employee to ensure the individual’s privacy).
• Ensure that the employee’s work area is thoroughly cleaned.
• If necessary, close the work area or workplace, until all necessary cleaning and disinfecting is completed; and communicate with employees about the presence of a confirmed case, the cleaning/disinfecting plans, and when the workplace will reopen.

Confirmed Cases
An employee will be considered a Confirmed Case of COVID-19 if they have received lab confirmed positive result.

If an employee believes that he or she qualifies as a Confirmed Case (as described above), he or she must:
• Immediately notify supervisor and/or Human Resources contact of his or her diagnosis; and
• Remain out of the workplace until they are cleared to return to work.

If an employee qualifies as a Confirmed Case, then ACCMHS will:
• Work with the Local Health Department and ensure all employees who may have come into close contact with the employee (being within approximately six feet for a prolonged period of time without PPE) two days before the confirmed case’s onset of symptoms while not disclosing the identity of the employee to ensure the individual’s privacy);
• Ensure that the entire workplace, or affected parts thereof (depending on employee’s presence in the workplace), is thoroughly cleaned and disinfected;
• If necessary, close the work area or workplace, until all necessary cleaning and disinfecting is completed; and
• Communicate with employees about the presence of a confirmed case, the cleaning/disinfecting plans, and when the workplace will reopen.

SECTION 6: BUSINESS CONTINUITY PLANS

ACCMHS has an existing Continuity of Operations Plan (COOP) in place as part of the agency’s overall emergency preparedness strategy. These COOP plans shall be referenced and updated as necessary to ensure consideration of COVID-19. The COVID-19 Workplace Coordinator and/or designee(s) will: (1) work with management to cross-train employees to perform essential functions so the workplace can operate even if key employees are absent; (2) identify alternate supply chains for critical goods and services in the event of disruption; and (3) develop an emergency communication plan to communicate important messages to employees and constituents. For the purposes of ACCMHS, the Management Team is named as the COVID-19 Workplace Coordinator. A member of that team will be on site at all times when employees are present during posted agency work hours.
### APPENDIX A – Phases of Return to Standard Operations

<table>
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<th>Criteria</th>
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<th>Phase 2 Stabilizing</th>
<th>Phase 3 Recovery</th>
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<td>Downward trajectory of cases reported within a 14-day period AND Downward trajectory of COVID-like syndromic cases reported within a 14-day period</td>
<td>Sustained reduction in percentage of new cases for 30-45 days</td>
<td>Sustained reduction percentage of new cases for 60-90 days</td>
</tr>
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<td></td>
<td>Health systems unable to handle influx of patients AND robust testing unavailable</td>
<td>Downward trajectory of documented cases within a 14-day period OR Downward trajectory of positive tests as a percent of total tests within a 14-day period (flat or increasing volume of tests)</td>
<td>Sufficient PPE supply available for a 30 day period of moderate on-site staffing</td>
<td>Sufficient PPE supply available for a 60 day period of full on-site staffing</td>
</tr>
<tr>
<td></td>
<td>Limited PPE supply available</td>
<td>Hospitals treat all patients without crisis care AND Robust testing program in place for at-risk healthcare workers, including emerging antibody testing</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>Sufficient PPE available (14 day supply)</td>
<td></td>
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<tr>
<td>Restrictions/ Guidelines for Persons Served</td>
<td>Services face to face should be limited to highest acuity needs (ACT meds, Injections, some housing services)</td>
<td>All consumers screened prior to any in-person interaction</td>
<td>Consumers vulnerable to virus and those in AFCs remain under isolation.</td>
<td>Consumer opt-in for face-to-face appointments.</td>
</tr>
<tr>
<td></td>
<td>All other services to be completed via tele-medicine</td>
<td>Consumers vulnerable to virus and those in AFCs remain under isolation.</td>
<td>Visits to senior care facilities should be prohibited</td>
<td>All vulnerable individuals can resume public interactions, but should continue practicing social distancing, minimizing exposure to social settings where distancing may not be practical.</td>
</tr>
<tr>
<td></td>
<td>No non-essential travel</td>
<td>Visits to senior care facilities should be prohibited</td>
<td></td>
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</tr>
<tr>
<td>Return to work sites in phases based on occupational risk</td>
<td>Staff able to access ACCMHS buildings for needed functions with PPE and distancing</td>
<td>Low Occupational Exposure Risk Staff return to office as able: Remote work as much as possible, staff in buildings</td>
<td>Medium Occupational Exposure Risk staff return to work with staggered schedules</td>
<td>Full shift back to community based service sites</td>
</tr>
<tr>
<td></td>
<td>Supporting remote work as much as possible for all staff</td>
<td>Shared offices if distancing supported; adherence with posted room capacities</td>
<td>Work from home options remain to support physical distancing</td>
<td>Telehealth remains (if allowed by State/CMS)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Strategies may include alternating staff working from home/office to manage contact among staff and support physical distancing</td>
<td></td>
<td>Flexible work from home options remain as determined</td>
</tr>
<tr>
<td>Expansion of In-Person Services (Full details in Clinical Transition to Face-to-Face Services document.)</td>
<td>Phase 0: Pandemic Situation</td>
<td>Phase 1: Urgent</td>
<td>Phase 2: Stabilizing</td>
<td>Phase 3: Recovery</td>
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</tr>
<tr>
<td>• ACT, Injections and Housing only in-person services</td>
<td>• Crisis/Access: Continue all services via tele-health</td>
<td>• Crisis/Access: Continue all services via tele-health unless ER workflow allows screens to some capacity</td>
<td>• Crisis/Access: Resumption of services in ER, clinic and community</td>
<td></td>
</tr>
<tr>
<td>• All other services completed tele-health, Doxy and Zoom meetings</td>
<td>• Med Clinic/Integrated Health/OT: Continue in-person injections; Doxy for apts. Continuation of restricting in-office telehealth appointments to urgent only. No OT in-home apts.</td>
<td>• Med Clinic/Integrated Health/OT: Continue in-person injections; Doxy for apts. Continuation of restricting in-office telehealth appointments to urgent only. Consideration of some on-site prescriber availability as needed. No OT in-home apts.</td>
<td>• Med Clinic/Integrated Health/OT: Being resuming in-person appointments unless telehealth/Doxy is effective and preferred OT resumption of in-home services</td>
<td></td>
</tr>
<tr>
<td>• Administrative duties done on-site as necessary</td>
<td>• ACT: Continue medication drops and continue to limit visits to urgent only as needed to ensure safety/stability of individuals with appropriate PPE.</td>
<td>• ACT: Continue medication drops and continue to limit in-person visits to weekly as needed to ensure safety/stability of individuals with appropriate PPE.</td>
<td>• ACT: Resumption of in-home services</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Housing: Continue to limit visits to urgent only as needed to ensure safety/stability of individuals with appropriate PPE.</td>
<td>• Housing: Begin weekly visits in community only as needed to ensure safety/stability of individuals with appropriate PPE.</td>
<td>• Housing: Resumption of in-home services</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Clerical: Continue on-site support</td>
<td>• Clerical: Continue on-site support</td>
<td>• Clerical: Continue on-site support</td>
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<tr>
<td></td>
<td>• CM/Supports Coordination: Continue video or telephone visits when able. Continue urgent home visits as needed to ensure safety/stability of individuals with appropriate PPE.</td>
<td>• CM/Supports Coordination: Continue video or telephone visits when able. Begin home visits if applicable monthly with appropriate PPE.</td>
<td>• CM/Supports Coordination: Resumption of in-home and community based services</td>
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</tr>
<tr>
<td></td>
<td>• Outpatient: Continue video or telephone visits when able. Continue urgent in-office visits as needed to ensure safety/stability of individuals with appropriate PPE.</td>
<td>• Outpatient: Continue video or telephone visits when able. Begin in-home visits if applicable monthly with appropriate PPE.</td>
<td>• Outpatient: Resumption of clinic-based services</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Autism/Children's Services: Continue video or telephone visits when able. Continue urgent in-office visits as needed to ensure safety/stability of individuals with appropriate PPE.</td>
<td>• Autism/Children's Services: Continue video or telephone visits when able. Begin in-home visits if applicable monthly with appropriate PPE.</td>
<td>• Autism/Children's Services: Resumption of in-home and clinic based services.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Prevention: Continue support of community with telephone or other technology platforms as able, no in-person duties</td>
<td>• Prevention: Continue support of community with telephone or other technology platforms as able, no in-person duties</td>
<td>• Prevention: Resumption of community and event based services</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• QI/HR/Finance/Rights/Cust Svc: Administrative duties only done on-site when necessary</td>
<td>• QI/HR/Finance/Rights/Cust Svc: Administrative duties only done on-site when necessary</td>
<td>• QI/HR/Finance/Rights/Cust Svc: Resumption of in-office hours and services</td>
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<td></td>
<td></td>
<td></td>
<td>• Transportation: Resumption of all needed services</td>
<td></td>
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<td></td>
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<td></td>
<td>• Training: &lt;10 or based on expanded room capacities</td>
<td></td>
</tr>
<tr>
<td>Phase 0 Pandemic Situation</td>
<td>Phase 1 Urgent</td>
<td>Phase 2 Stabilizing</td>
<td>Phase 3 Recovery</td>
<td></td>
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<td>---------------------------</td>
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</table>
|                           | **Transportation**: Only when necessary and urgent in-office visits as needed to ensure safety/stability of individuals with appropriate PPE. | **Prevention**: Continue support of community with telephone or other technology platforms as able, some in-person duties as needed to ensure safety/stability of individuals with appropriate PPE.  
**QI/HR/Finance/Rights/Cust Svc**: Administrative duties done on-site when necessary and in appropriate social distancing measure and available PPE  
**Transportation**: Only when necessary visits as needed to ensure safety/stability of individuals with appropriate PPE.  
**Training**: Small groups/trainings and congregate-based services, <5-10 or based on room capacity. Consider offering smaller more frequent classes when necessary. |
APPENDIX B
COVID-19 Health Screening Questionnaire
(Submit Form to Human Resources)

Company: Allegan County CMH Services
Name: ________________________________
Date: ________________________________ Time In: ________________________________

In the last 24 hours, have you experienced:

<table>
<thead>
<tr>
<th>Symptom</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Subjective fever (felt feverish)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>New or worsening cough</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shortness of breath or difficulty breathing</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chills</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Headache*</td>
<td></td>
<td></td>
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<tr>
<td>Sore throat</td>
<td></td>
<td></td>
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<tr>
<td>Loss of smell or taste</td>
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<tr>
<td>Runny nose or congestion*</td>
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<tr>
<td>Muscle aches</td>
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<tr>
<td>Abdominal pain</td>
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<td></td>
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<tr>
<td>Fatigue</td>
<td></td>
<td></td>
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<tr>
<td>Nausea</td>
<td></td>
<td></td>
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<tr>
<td>Vomiting</td>
<td></td>
<td></td>
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<tr>
<td>Diarrhea*</td>
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</table>

Current Temperature: __________________________

*New or worsening symptoms outside of what individual defines as normal.

If you answer “Yes” to any of the symptoms listed above OR your temperature is 100.4°F or higher, please do not enter an ACCMHS building or service location. Self-isolate at home and contact your primary care physician’s office for direction.

- You should isolate at home for minimum of 10 days since symptoms first appear or per guidance of your local health department.
  - If diagnosed as a probable COVID-19 or test positive, call your local health department and make them aware of your diagnosis or testing status.
- You must also have 3 days without fevers and improvement in respiratory symptoms.

In the past 14 days, have you:

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Had close contact with an individual diagnosed with COVID-19?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Traveled (independent vehicle, airplane, bus, trains) internationally or domestically? Circle method of transportation and contact <a href="mailto:healthsafety@accmhs.org">healthsafety@accmhs.org</a></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If you answer “Yes” to either of these questions, please do not enter an ACCMHS building or service location. Self-quarantine at home for 14 days. Contact your primary care physician’s office if you have symptoms or have had close contact with an individual for evaluation. If you are given a probable diagnosis or test positive call your local health department to ensure they are aware.

For questions, visit www.allegancounty.org/health. Contact the Allegan County Health Department at (269) 696-4546 or COVID-19@allegancounty.org. Spanish language versions of this form are available...
APPENDIX C

EMPLOYEE RETURN TO OFFICE AFTER POSITIVE SCREEN OR DIAGNOSIS

Employees who are probable or confirmed positive test for COVID-19, or display one or more of the principal symptoms of COVID-19 (fever, atypical cough, or atypical shortness of breath) will not be permitted to return to on site until either:

1. 3 days have passed since their symptoms have resolved AND 10 days have passed since their symptoms first appeared or since they were swabbed for the test that yielded the positive result; or
2. They receive a negative COVID-19 test.

Employees may work remotely if approved by their supervisor.

Employees\(^1\) who have been in “close contact” (being within approximately six feet for a prolonged period of time) with an individual who tests positive for COVID-19 or who displays one or more of the principal symptoms of COVID-19 will not be permitted to return to work until either:

1. 14 days have passed since the last close contact with the sick or symptomatic individual; or
2. The symptomatic individual receives a negative COVID-19 test.

\(^1\) The “close contact” rule does not apply to the following classes of workers: health care professionals workers at a health care facility (including hospitals, surgical centers, health maintenance organizations, nursing homes, hospice, and veteran’s facilities); first responders (e.g., police officers, fire fighters, paramedics); child protective service employees; workers at child caring institutions, as defined in MCL 722.111; and workers at correctional facilities.
APPENDIX D

SIGNS FOR BUILDINGS

Allegan County Public Health has worked with Human Resources in developing signage utilized both internally at offices and at entrances:

Per Governor Whitmer’s Executive Order 2020-59,
YOU MUST WEAR A FACE MASK TO ENTER THE BUILDING
A face mask includes a homemade cloth mask, scarf, or bandana. Your mask must cover your nose and mouth.

KNOW THE SYMPTOMS OF COVID-19
- Fever
- Dry Cough
- Shortness of Breath

PRACTICE & REINFORCE GOOD PREVENTION HABITS
COVID-19 has made a lot of people sick. Some of the ways that people get sick are:
- Wash your hands
- Avoid touching your eyes, nose, and mouth with unwashed hands
- Cover your mouth and nose with a tissue when coughing or sneezing
- Avoid handshakes
- Avoid contact with sick people
- Stay home when you are sick

KEEP THINGS CLEAN!
Clean and disinfect frequently touched objects and surfaces using a regular household cleaning spray or wipe.

If YES to the above questions, do not enter the building. Call your medical provider for guidance. Please consider doing business with us by phone, email or at www.allegancounty.org.
APPENDIX E

OTHER RESOURCES

Governor Whitmer’s Executive Order 2020-42 and Executive Order 2020-59
https://www.michigan.gov/whitmer/0,9309,7-387-90499-90705-525182--00.html
https://www.michigan.gov/whitmer/0,9309,7-387-90499-90705-526894--00.html

FAQs from Governor Whitmer on Executive Order 2020-42 and Executive Order 2020-59
https://www.michigan.gov/coronavirus/0,9753,7-406-98178-98455-525278--00.html
https://www.michigan.gov/coronavirus/0,9753,7-406-98178-98455-527027--00.html

MIOSHA

OSHA

White House Opening Up America
https://www.whitehouse.gov/openingamerica/

Helpful CDC Guidance

CDC Handwashing Fact Sheet

CDC Fact Sheet and Poster on Preventing the Spread of Germs

CDC Fact Sheet on What to Do if You Are Sick

CDC Poster for Entrance Reminding Employees Not to Enter When Sick

CDC Guidance on Reopening Businesses
APPENDIX F

ALLEGAN COUNTY COMMUNITY MENTAL HEALTH SERVICES
COVID-19 PREPAREDNESS AND RESPONSE PLAN

Certification by Responsible Official

This is to certify that I have reviewed the Allegan County COVID-19 Preparedness and Response Plan attached hereto and to the best of my knowledge and belief:

1. It complies with Michigan Executive Order #2020-77.


3. The plan is available on the Allegan County Community Mental Health Services (ACCMHS) website www.accmhs.org which is accessible from each ACCMHS facility where in-person operations take place during the COVID-19 emergency.

I declare that the foregoing is true and correct.

Municipality/Entity: Allegan County Community Mental Health Services

Signature: ______________________

Name of Official: Mark A. Witte, MSW, LMSW

Title: Executive Director

Date: June 1, 2020
APPENDIX G

Frequently Asked Questions (FAQ) Related to the Guidance on Leave Related to COVID-19

These questions and answers apply to regular full-time and regular part-time employees effective April 1, 2020.

1. **Question:** I personally am diagnosed with COVID-19 and am unable to work how will I be paid? What options are available to me as an employee with ACCMHS?
   a. **Answer:** You need to apply for a leave of absence, contact Human Resources (HR) at hr@accmhs.org. You will be given paperwork to complete including Short Term Disability (STD) paperwork. You are eligible to submit a claim for STD. If you are approved for STD, your replacement wages will begin after a 14 day (calendar) wait period. Your wages through STD will cover 2/3 of your regular wages with a maximum of $500 per week. You will be eligible to receive up to 80 hours of Emergency Paid Sick Leave. These hours can be used to cover the 14 day wait period for STD. You may use PTO to make your pay whole for each week you receive STD replacement wages. Once your Emergency Paid Sick Leave (up to 80 COVID hours) is used up, you can then use your PTO or Flex or choose to take this time unpaid and receive only the STD replacement wages.

2. **Question:** If I self-quarantine, have not been advised by a medical provider to do so, and am not able to work remotely, how will I be paid? Or, if I am caring for an individual who has self-quarantined and has not been advised by a medical provider to do so, and am not able to work remotely, how will I be paid?
   a. **Answer:** Subject to your supervisor’s approval, you are able to utilize PTO, flex time or be unpaid.

3. **Question:** If I am working remotely, but may at times not get all my hours worked due to lack of work or lack of work duties, how will I be paid?
   a. **Answer:** If employees in good faith meet the criteria below, employees will receive pay for their normal work schedule. Therefore, if the criteria is met please use hourly for your hours worked and admin leave for any non-worked hours (up to 40 hours per week)
      i. Remote staff shall remain available for work;
      ii. Staff shall be considered to be working remotely and shall report for work at their normal designated times from their home location, unless otherwise directed.
      iii. Employees shall assist in supporting the work of other service areas if their own workload becomes limited.
      iv. If all workloads or assignments became limited, employees shall be expected to participate in online education and development (links were provided).
   All employees shall stay in contact with their supervisor and if time availability exists, they shall offer assistance to their program and the Agency in general through a number of review and planning tasks that normal business times do not always allow for. Examples include developing or reviewing standard operating procedures for all tasks performed on a daily basis, reviewing policies, etc.

4. **Question:** What makes me eligible for workers’ compensation pay when it comes to COVID-19?
   a. **Answer:** The simple answer is that an employee is entitled to reasonable and necessary medical care and wage loss due to a work-related injury and illness. It is the employee’s burden to prove that an injury or illness is work-related. If the employee meets this burden, it could very well be a Workers’ Compensation claim. That said, illness claims are very difficult to tie an exposure back to the workplace and not another exposure we are all susceptible to in our everyday life. Please follow the normal process for submitting a Workers’ Compensation claim. Please contact HR at HR@accmhs.org for assistance.

5. **Question:** If an employee chooses to stay home and there is no work to perform from home, will the employee be paid?
   a. **Answer:** Subject to your supervisor’s approval, you are able to utilize PTO, Flex time or be unpaid.
6. **Question**: What is the difference between the terms, self-isolation or self-quarantine?
   a. **Answer**: The Center for Disease Control and Prevention provides the following definitions:
      i. Isolation separates sick people with a contagious disease from people who are not sick.
      ii. Quarantine separates and restricts the movement of people who were exposed to a contagious disease to see if they become sick.

7. **Question**: I would like to know more about COVID-19, but there is so much information available. Are there credible sources available?
   a. **Answer**: According to our Public Health Team:
      i. Updates will continue to be posted on Allegan County’s Facebook and website. Follow @AlleganCountyHD on Facebook and visit [www.allegancounty.org/health](http://www.allegancounty.org/health).
      ii. Allegan County’s COVID-19 informational hotline at (269) 686-4546 (operational from 8:00am to 8:00pm daily) and email [COVID-19@allegancounty.org](mailto:COVID-19@allegancounty.org) are available for all residents.
      iii. Additional accurate information is available at [www.michigan.gov/coronavirus](http://www.michigan.gov/coronavirus); [www.cdc.gov/coronavirus](http://www.cdc.gov/coronavirus)
<table>
<thead>
<tr>
<th>Reports</th>
<th>Employee</th>
<th>Consumer – Not in Residential</th>
<th>Consumer – Residential or Supported Living Setting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contact w/ Someone w/ Positive COVID-19 Diagnosis or Test</td>
<td>If contact was outside of work: [ ] Supervisor to consider assignment to remote work</td>
<td>[ ] If contact was not while receiving services: [ ] Notify consumer/guardian (as appropriate) [ ] Provide MI COVID hotline, (888) 535-6136 ACHD COVID-19 hotline: (269) 686-4546</td>
<td>[ ] If contact was not while receiving services: [ ] Notify consumer/guardian (as appropriate) [ ] Provide MI COVID hotline, (888) 535-6136 ACHD COVID-19 hotline: (269) 686-4546</td>
</tr>
<tr>
<td>If on-site work is required: [ ] HR instructs staff to monitor days from exposure, wear a mask, and participate w/ screening protocols closely for symptoms for 14-days from the exposure</td>
<td>[ ] If meeting in-person, ask that they wear a surgical mask and maintain 6-feet of social distance [ ] Advise that they pay attention for any symptoms for 14-days from the exposure [ ] Request that the provider/consumer/guardian notify the primary clinician.</td>
<td>[ ] Ask that they wear a surgical mask and maintain 6-feet of social distance [ ] Advise that they pay attention for any symptoms for 14-days from the exposure [ ] Request that the provider/consumer/guardian notify the primary clinician.</td>
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</table>

**APPENDIX H – Exposure Control Checklist**

**With Symptoms of COVID-19**

- [ ] HR asks the employee to follow-up with their healthcare provider and advise they may call the MI COVID-19 hotline, (888) 535-6136 and/or ACHD COVID-19 hotline: (269) 686-4546
- [ ] Employee identifies and documents when their symptoms began by filling out the COVID screening questionnaire
- [ ] Employee identifies and documents who they had recent, close contact with (staff or consumer, within 6 feet, in the past 48 hours prior to symptom onset)
- [ ] If working remotely, work with HR to determine when in-person work is allowed.
- [ ] If working on-site, HR to work with supervisor to consider assignment to remote work.
- [ ] Work with HR to determine when in-person work is allowed.

- [ ] Ensure the consumer/guardian contact the consumer’s Primary Care Physician, and request the consideration of COVID-19 test.
- [ ] If meeting in-person, ask that they wear a surgical mask and maintain 6-feet of social distance.
- [ ] Contact consumer’s guardian, if applicable.
- [ ] Identify and document when the consumer’s symptoms began.
- [ ] Identify and document who they had recent, close contact with (staff or consumer, within 6 feet, in the past 48 hours prior to symptom onset) in non-billable note in EMR
- [ ] Request that the provider/consumer/guardian notify the primary clinician if a test is ordered and the results.
- [ ] Employee notifies supervisor.
- [ ] If the doctor orders a COVID-19 test:
  - [ ] Email the consumer’s name, case number, date of ordered test and report the symptoms to healthsafety@acmcms.org.
  - [ ] Notify all employees who work in the home (within 12 hours).

**With Positive COVID-19 Diagnosis or Test**

- [ ] Follow steps above re: Employees w/ Symptoms of COVID-19, if not already complete.
- [ ] Report to HR and HR will follow all applicable health department instructions.
- [ ] Notify consumers and their guardians who may have been exposed:
  - [ ] Provide them w/ the MI COVID-19 hotline, (888) 535-6136 ACHD COVID-19 hotline: (269) 686-4546
  - [ ] Let staff know if they were exposed, report to HR and HR will follow the health department guidelines for contact tracing

- [ ] Follow steps above re: Consumer – Not in Res. w/ Symptoms of COVID-19, if not already complete.
- [ ] Notify consumers and their guardians who may have been exposed:
  - [ ] Provide them w/ the MI COVID-19 hotline (888-535-6136) and ACHD COVID-19 hotline (269)-686-4546
  - [ ] Let staff know if they were exposed, report to HR and HR will follow the Employee Exposure Notification protocol.