

# FLINT CULTURAL CENTER ACADEMY

## COVID-19 PREPAREDNESS AND RESPONSE PLAN

In accordance with Executive Orders that have been issued in response to the novel coronavirus (COVID-19), the Academy adopts the following social distancing practices and other mitigation measures to protect Academy employees and contractors.

### COVID-19 Preparedness and Response Plan

The symptoms of COVID-19 typically include fever, cough, and shortness of breath. Some people infected with the virus have reported experiencing other non-respiratory symptoms. Other people, referred to as asymptomatic cases, have experienced no symptoms at all. COVID-19 is thought to be spread mainly from person to person, between people who are in close contact with one another (within about 6 feet) and through respiratory droplets produced when an infected person coughs, sneezes or talks. It is also possible that a person can get COVID-19 by touching a surface or object that has the virus on it and then touching their mouth, nose, or possibly their eyes.

#### A. Basic Prevention Measures

1. Employees are encouraged to stay home if they are experiencing COVID-19 related symptoms (fever, cough, or shortness of breath).
2. The Academy encourages respiratory etiquette, including covering coughs and sneezes, and frequent and thorough handwashing.
3. Employees are discouraged from using other workers' phones, desks, offices, or other work tools and equipment, when possible.
4. Employees are encouraged to self-monitor for signs and symptoms of COVID-19 if they suspect possible exposure.
5. In order to increase the physical distance among employees, the Academy will continue to evaluate exposure-reducing measures, such as the extent to which employees are able to work remotely and staggered work shifts. Employees and other individuals who are on Academy property should keep at least six feet from one another to the maximum extent possible.
6. The Academy is also aware that some employees may be at higher risk for serious illness, such as older adults and those with chronic medical conditions, and will continue to evaluate exposure-reducing measures including ensuring those employees maintain a distance of 6 feet from other employees and visitors.
7. The Academy will continue to maintain routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment.
8. The Academy will comply with applicable local orders issued by the County Health Department.

## **Prohibition from Entering Academy Property**

Any employee or contractor of the Academy who displays respiratory symptoms or has had contact with a person who is known or suspected to have contracted COVID-19 is prohibited from entering property owned, leased, or controlled by the Academy, as set forth in this policy.

- A. Employees and contractors who test positive for COVID-19 or who display one or more of the principal symptoms of COVID-19 are prohibited from entering property owned, leased, or controlled by the Academy until:
  - 1. three days have passed since their symptoms have resolved and seven days have passed since their symptoms first appeared or since they were swabbed for the test that yielded the positive result: or
  - 2. the employee or contractor receives a negative COVID-19 test.
- B. Employees and contractors who have had close contact with an individual who tests positive for COVID-19 or with an individual who displays one or more of the principal symptoms of COVID-19 are prohibited from entering property owned, leased, or controlled by the Academy until:
  - 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.
- C. Pursuant to Executive Order 2020-36 or any subsequent order, an employee shall not be discharged, disciplined, or otherwise retaliated against for staying at home for periods described above.
- D. An employee who is allowed to return after the periods described above but declines to do so may be subject to discipline, up to and including discharge.
- E. To the extent that the employee has no paid leave under state or federal law or accrued paid vacation leave, personal leave or family leave, the leave may be unpaid.
- F. Any child care workers at a child care located within an Academy building (including workers at disaster relief child care centers), are permitted to be physically present in Academy buildings, as determined by Academy administrators and to the greatest extent permitted by applicable executive orders or state law.
- G. For purposes of this policy:
  - 1. The “principal symptoms of COVID-19” are fever, atypical cough, or atypical shortness of breath.
  - 2. “Close contact” means being within approximately six feet of an individual for a prolonged period of time. Close contact can occur, for example, while caring for, living with, visiting, or sharing a health care waiting room with an individual.

## **Social Distancing Practices and Mitigation Measures**

The Academy shall minimize the number of employees and contractors who are present in any Academy building to no more than is strictly necessary to perform the activities authorized by executive order and state law. The Academy shall promote work to the fullest extent possible.

Employees and contractors who are in an Academy building or on Academy property shall maintain a distance of at least six feet from one another to the maximum extent possible.

The Academy shall implement other social distancing practices and mitigation measures relating to COVID-19 as recommended by the Centers for Disease Control and Prevention and local health authorities to the maximum extent possible.

### **Self-Reporting by Employees and Contractors**

To proactively take measures to minimize the spread of COVID-19 and keep our school community as safe as possible during this Public Health Emergency, employees and contractors shall self-report any COVID-19 related concerns. In the event that an employee or contractor is unable to self-report, the employee should make best efforts to notify the Academy, or have a member of the employee or contractor's family notify the Academy, as soon as practicable under the circumstances.

A. Employees and contractors shall self-report any one of the following situations:

#### **Quarantine**

- You have been advised by a healthcare provider to self-quarantine.
- You have self-quarantined as a preventative care measure because of COVID-19 related symptoms as described by the Centers for Disease Control and Prevention (i.e. fever, cough, difficulty breathing).
- You are subject to a quarantine or isolation order.

#### **Care for Others**

- You are caring for an individual who is subject to an order as described above.
- You are caring for a son or daughter and the school or childcare provider has been closed or is unavailable due to COVID-19.
- You must care for an at-risk family member who is following a requirement or recommendation to quarantine due to exposure to or symptoms of COVID-19.

#### **Exposure**

- You know or have reason to believe another employee has COVID-19.
- You have come into contact with someone who has tested positive for COVID-19.
- You believe you have been exposed to COVID-19.
- You are experiencing symptoms and are actively seeking a medical diagnosis.

#### **Diagnosis**

- You have been diagnosed with/tested positive for COVID-19.

### **Confidentiality**

The Academy will take reasonable precautions to protect health information pursuant to all applicable laws and statutes, including, but not limited to, the Americans with Disabilities Act (ADA), the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Family Education Rights and Privacy Act of 1974 (FERPA).

## **Emergency Paid Sick Leave**

The Families First Coronavirus Response Act (“FFCRA”) Emergency Paid Sick Leave Act provides eligible employees up to 80 hours of paid leave for one (1), or for a combination, of the following reasons:

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 due to concerns related to COVID–19.
3. The employee is experiencing symptoms of COVID–19 and seeking a medical diagnosis.
4. The employee is caring for an individual who is subject to an order as described in (1) above or has been advised as described in (2) above.
5. The employee is caring for a son or daughter of such employee if the school or place of care of the son or daughter has been closed, or the child care provider of such son or daughter is unavailable, due to COVID–19 precautions.
6. The employee is 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.

Full time employees may be eligible for up to 80 hours of paid sick leave for one of the qualifying reasons. Part time employees may be eligible for up to a number of hours equal to the number of hours that such employee works, on average, over a 2-week period. Emergency Paid Sick Leave under the FFCRA shall not exceed 80 hours.

Paid sick time is calculated based on the employee’s compensation and the number of hours the employee would otherwise be scheduled to work, except that in no event shall such paid sick time exceed:

1. \$511 per day and \$5,110 in the aggregate for reasons (1), (2), or (3) (above);
2. \$200 per day and \$2,000 in the aggregate for reasons (4), (5), or (6) (above).

Paid sick time provided to an employee shall cease beginning with the employee’s next scheduled work shift immediately following the termination of the need for paid sick time under the FFCRA. Emergency Paid Sick Leave shall not carry over from one year to the next.

## **Emergency Family and Medical Leave Expansion**

The FFCRA Emergency Family and Medical Leave Expansion Act (EFMLEA) provides eligible employees up to twelve (12) weeks of leave if the employee is unable to work (or telework) due to a need for leave to care for the son or daughter under 18 years of age of such employee if the school or place of care has been closed, or the child care provider of such son or daughter is unavailable, due to a public health emergency.

An employee must have been employed for at least 30 calendar days to be eligible for leave under the EFMLEA.

The first ten (10) days for which an employee takes EFMLEA leave shall be unpaid, however the employee may be eligible for Emergency Paid Sick Leave, as described above.

Each day of leave after the initial 10 days expires shall be paid. Paid leave shall be calculated based on an amount that is not less than two-thirds of an employee's regular rate of pay and the number of hours the employee would otherwise be normally scheduled to work. Paid leave shall not exceed \$200 per day and \$10,000 in the aggregate.

Public Health Emergency means an emergency with respect to COVID-19 declared by a Federal, State, or local authority.

Child Care Provider means a provider who receives compensation for providing child care services on a regular basis, including an 'eligible child care provider' (as defined in section 658P of the Child Care and Development Block Grant Act of 1990 (42 U.S.C. 9858n)).

School means an 'elementary school' or 'secondary school' as such terms are defined in section 8101 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 7801).

Son or Daughter means "a biological, adopted, or foster child, a stepchild, a legal ward, or a child of a person standing in loco parentis, who is under 18 years of age; or 18 years of age or older and incapable of self-care because of a mental or physical disability."

### **Documentation**

An employee who needs to take leave under the Emergency Paid Sick Leave Act or EFMLEA should submit a written request with the following information:

1. The employee's name.
2. The date or dates for which leave is requested.
3. A statement of the COVID-19 related reason the employee is requesting leave and written support for such reason; and
4. A statement that the employee is unable to work, including by means of telework, for such reason.

In the case of a leave request based on a quarantine order or self-quarantine advice, the written support provided by the employee should include the name of the governmental entity ordering quarantine or the name of the healthcare professional advising self-quarantine, and, if the person subject to quarantine or advised to self-quarantine is not the employee, that person's name and relation to the employee.

In the case of a leave request based on a school closing or child care provider unavailability, the statement from the employee should include the name and age of the child (or children) to be cared for, the name of the school that has closed or place of care that is unavailable, and a representation that no other person will be providing care for the child during the period for which the employee is receiving family medical leave and, with respect to the employee's inability to work or telework because of a need to provide care for a child older than fourteen during daylight hours, a statement that special circumstances exist requiring the employee to provide care.

### **Expiration**

This policy and the requirements under this policy shall expire on December 31, 2020, unless state or federal law extends the expiration date.

## **Legal References**

Families First Coronavirus Response Act (“FFCRA”) Emergency Paid Sick Leave Act (PL 116-127, § 5101 et seq.; 134 Stat. 177)

Families First Coronavirus Response Act (“FFCRA”) Emergency Family and Medical Leave Expansion Act (PL 116-127, § 3101 et seq.; 134 Stat. 177)

Executive Order 2020-65, or any subsequent order

Executive Order 2020-36, or any subsequent order

Executive Order 2020-110, or any subsequent order

Executive Order 2020-114, or any subsequent order

Occupational Health and Safety Administration Guidance on Preparing Workplaces for COVID-19, available at <https://www.osha.gov/Publications/OSHA3990.pdf>.

**FLINT CULTURAL CENTER ACADEMY**  
**Administrative Guidelines for**  
**COVID-19 Preparedness and Response Plan**

In conjunction with its COVID-10 Preparedness and Response Plan, Flint Cultural Center Academy (the “Academy”) and its employees, third-party contractors, and visitors shall follow the procedures below, as applicable, so long as required by law or executive order, or determined by Academy administration to be necessary for the health and safety of Academy employees, students, and visitors.

**I. Compliance with Legal Requirements**

- A. The CEO or his/her designee shall assign at least one worksite supervisor to each Academy building and/or worksite, who is charged with implementing, monitoring, and reporting on the COVID-19 control strategies developed in the Academy’s COVID-19 Preparedness and Response Plan.
  - i. The worksite supervisor must remain on-site at all times when employees are present on site.
- B. For employees working on site in Academy buildings or on Academy property, the Academy shall provide training that covers:
  - i. Workplace infection control practices.
  - ii. Proper use of personal protective equipment.
  - iii. Steps the employee must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
  - iv. How to report unsafe working conditions.
  - v. The Academy shall maintain a record that it has complied with these training requirements.

**II. Social Distancing Practices and Mitigation Measures**

- A. **Daily Screening Protocol.** Before or upon entering a Academy building or Academy property for work each day, each employee or contractor will be subjected to a self-screening protocol that includes a questionnaire covering whether the employee has symptoms of COVID-19 or has been in close contact with individuals who have tested positive for COVID-19 or who have symptoms of COVID-19. The online version of this questionnaire can be found by following this link <https://misymptomapp.state.mi.us/> and entering the **employer code: 5378-8100**. Employees that do not have access to a smart phone or other device to access this questionnaire will be provided a hard copy to complete upon arriving to the Academy.

As required by law, the Academy shall maintain records of its compliance with the daily entry self-screening protocol requirement by maintaining copies of the questionnaires completed by employees. These questionnaires will be maintained in a confidential paper and/or digital file, accessible only as needed by Academy staff to comply with this guideline, Policy [---], an executive order, or law.

**B. Social Distancing.** Employees and contractors who are in a Academy building or on Academy property shall maintain a distance of at least six (6) feet from one another to the maximum extent possible.

- i. To assist in this social distancing requirement, the Academy will use ground markings, signs, and physical barriers as appropriate and practicable.

**C. Face Coverings.**

- i. Employees must wear face coverings when they cannot consistently maintain six (6) feet of separation from other individuals in the workplace.
- ii. Employees must wear face shields when they cannot consistently maintain three (3) feet of separation from other individuals in the workplace.

D. Cleaning supplies will be available to employees at their worksites.

### **III. Additional Safety Measures**

A. The Academy has increased workplace cleaning and disinfection to limit exposure to COVID-19, particularly on high-touch surfaces and shared equipment and products.

B. Work-related travel for employees is restricted to essential travel only.

C. The Academy will continue to promote remote work to the fullest extent possible.

D. Employees are encouraged to use personal protection equipment and hand sanitizer on public transportation, if applicable.

### **IV. Protocol when Individual in the Workplace Identified as Positive for COVID-19**

Should the Academy become aware that an employee assigned to work on site has tested positive for COVID-19, it will take the following steps:

A. If the employee is at work, the employee will be isolated from others and arrangements made for the employee to go home or receive medical care (as applicable) immediately.

B. The worksite where the employee is assigned will be temporarily closed.

- i. All areas of the worksite where the employee works, or travels will be disinfected and deep cleaned in accordance with guidance from the Centers for Disease Control and Prevention (the “CDC”).



- C. With 24 hours of receiving notice an employee has tested positive for COVID-19, the Academy will notify:
  - i. The local public health department.
  - ii. Any co-workers, contractors, or suppliers who may have come into contact with the person with a confirmed case of COVID-19.
  - iii. The Academy shall maintain a record that it has complied with these notice requirements.
- D. A co-worker, contractor, or supplier who has had close contact with the employee who tested positive for COVID-19 is prohibited from entering property owned, leased, or controlled by the Academy until fourteen (14) days have passed since the last close contact with the employee who tested positive for COVID-19.
  - i. "Close contact" means being within approximately six feet of an individual for a prolonged period of time.
- E. An employee with a confirmed case of COVID-19 may return to the workplace only after they are no longer infectious according to the latest guidelines from the CDC.

## **V. Specific Requirements for Offices**

In addition to the general requirements imposed on all businesses and operations, Executive Order 2020-114 also imposes specific additional requirements on offices. Therefore, the following additional policies and procedures apply to Academy offices so long as required by law or executive order, or determined by Academy administration to be necessary for the health and safety of Academy employees, students, and visitors:

- A. While working in Academy offices, employees and contractors must wear face coverings in shared spaces, including restrooms and hallways, and during in-person meetings.
- B. To assist employees and contractors in maintaining a distance of at least six (6) feet apart while working in Academy offices, the Academy will:
  - i. Provide visual indicators of appropriate spacing for employees outside the building in case of congestion.
  - ii. Spread out workstations and stagger workspace usage.
  - iii. Restrict use of non-essential common space (e.g., cafeterias).
  - iv. Provide visual cues to guide movement and activity (e.g., restricting elevator capacity with markings, locking conference rooms).

- v. Prohibit social gatherings and meetings that do not allow for social distancing or that create unnecessary movement through the office.
- C. All employees working in Academy offices shall be assigned a dedicated entry point to reduce congestion at the main entrance.
- D. As required by executive order, water fountains will be turned off.
- E. To maintain the cleanliness of the office environment, the Academy shall:
  - i. Provide disinfecting supplies and require employees to wipe down their workstations at least twice daily.
  - ii. Post signs about the importance of personal hygiene.
  - iii. Disinfect high-touch surfaces; and
  - iv. Minimize the shared use of items when possible.
- F. All nonessential visitors are prohibited from entering Academy offices.
- G. The Academy shall notify Academy employees or contractors working in an Academy office if the Academy learns that an individual with a confirmed case of COVID-19 has visited the office.

## **VI. Confidentiality**

The Academy will take reasonable precautions to protect health information pursuant to all applicable laws and statutes, including, but not limited to, the Americans with Disabilities Act (ADA), the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Family Education Rights and Privacy Act of 1974 (FERPA).

## **VII. Legal References**

Executive Order 2020-65, or any subsequent order

Executive Order 2020-36, or any subsequent order

Executive Order 2020-110, or any subsequent order

Executive Order 2020-114, or any subsequent order

Occupational Health and Safety Administration Guidance on Preparing Workplaces for COVID-19, available at <https://www.osha.gov/Publications/OSHA3990.pdf>.