

**EMPLOYMENT ENTERPRISES, INC.**  
**COVID-19 PANDEMIC RESPONSE**  
**ACTION, PREVENTION, AND PREPAREDNESS PLAN**

This Action, Prevention, and Preparedness Plan will be referred to as the Plan within this document.

**Purpose**

This Plan details procedures to prevent and minimize hazards to human health as it relates to the Covid-19 Pandemic. This Plan is prepared to describe precautionary and response measures to execute work safely and effectively by Employment Enterprises, Inc., (EEI) employees and program participants.

This Plan is a living document, to be updated as often as new information regarding the pandemic is released. This Plan attempts to capture specific actions, prevention methods, and procedures to address emergencies resulting from Covid-19. The provisions of this Plan will be implemented on-site and emergency action will be taken during any event that may threaten human health at EEI's sites or any of the community sites where EEI employees or program participants are employed.

This Plan supplements EEI's safety policies.

**Compliance**

All employees are responsible for implementing and complying with all aspects of this Plan. EEI management gives leadership full support in enforcing the provisions of this policy.

Our employees are our most important assets. We are serious about safety and health and keeping our workers working at EEI. Employee involvement is essential in developing and implementing a successful Plan. We have involved our employees in this process by holding small meetings, using social distancing, including one on May 19, 2020. Meetings will be held prior to reopening and periodically as necessary. Employees will be asked for their input. Our Plan follows Centers for Disease Control and Prevention (CDC) and Minnesota Department of Health (MDH) guidelines, federal OSHA standards related to Covid-19 and Executive Order 20-48.

On March 25, 2020, Governor Walz issued a "Stay at Home" order, which mandated that all workers except some of those in "critical sectors" stay at home. It was rescinded on May 18, 2020; however, it may be mandated by Governor Walz again in the future.

- Employees who can perform their job functions remotely should do so with management approval.
- Return of employees and program participants to EEI's sites is determined based on current/updated guidelines for social distancing and hygiene outlined by Governor Walz or other authorities. The determination is made on an individual basis taking into consideration each program participants ability to adhere to the current guidelines and EEI's ability to provide adequate support to assist program participants in maintaining current social distancing/hygiene guidelines.
- Program participants will need guardian approval before returning to EEI.
- Community sites are evaluated individually and, if determined to be safe, employees and program participants can return to work only with approval of EEI's Executive Director. The following criteria will be used to individually evaluate workplace safety:
  - If an employee or program participant has contact with someone or is living with someone who tests positive for Covid-19, current guidance states the individual should self-quarantine for 14 days.
  - If an employee or customer of a community site in an area where participants work tests positive, all program participants and employees will be immediately removed from the site. Return to the site will be determined on an individual basis.
  - If EEI is faced with an outbreak in its facility, EEI may deem it necessary to voluntary close until it is safe to provide services. Factors in determining a full closure include, but are not limited to, the number of people and groups of people exposed and whether staffing ratios can be maintained during the outbreak.

### **General Site Entry and Work Location Screening**

Employees have been informed of and are encouraged to self-monitor for signs and symptoms of Covid-19. The following procedure has been implemented to assess employees' and program participants' health statuses prior to entering the workplace and for employees and program participants to report when they are sick or experiencing symptoms.

Prior to obtaining access to EEI's facilities or vehicles, employees and program participants shall:

- Upon arrival at EEI, all employees and program participants will wash their hands.
- Program participants will put on a mask **before** entering an EEI vehicle (if they are willing to do so without behavioral challenges).
- Employees will put on a mask.
- Employees will complete EEI's Safety Form Access Questionnaire, which includes a body temperature check, and
- Individuals with symptoms matching those with Covid-19 will not be granted access to EEI's facilities and/or vehicles.

Additional workforce management procedures shall include:

- Face coverings shall be required for the duration of the activity and transportation while in the same vicinity as other employees or program participants. The following mask types will be allowed:
  - N95 respirator without exhaust valve,
  - Cloth or medical masks,
  - Employer-supplied face covering (if applicable and available), and
  - Employee-supplied face covering approved by the employer in the event other mask types listed are not available due to shortages.
- A six-foot minimum distance shall be maintained between all individuals while onsite.
- There will be maximum of ten individuals in each individual area within the facility where a six-foot distance cannot be maintained. In large spaces where a six-foot distance can be maintained, the maximum of ten individuals does apply. To minimize cross-contamination between areas, individuals will be assigned to a specific area for the day and should remain in that area except for using the restroom. Individuals will not be allowed to walk throughout the building, including those who work in offices without a specific purpose that would require it.
- Employees will know the signs and symptoms of Covid-19. Information will be distributed to employees or posted as there are developments relating to the signs and symptoms of Covid-19.
- All employees and program participants (or residential providers) shall provide notice of any individual who develops symptoms or are confirmed for Covid-19 for up to seven days following their visit to EEI. If individuals are determined to have been potentially contagious while at an EEI site, protocol for confirmed cases will be followed as laid out in this document.
- All community sites at which EEI provides services shall provide notice of any employee or customer who develops symptoms or are confirmed for Covid-19 for up to seven days following a visit to the community site. If individuals are determined to have been potentially contagious while at the community site, protocol for confirmed cases will be followed as laid out in this document.
- Employees will monitor the program participants they are supervising for symptoms daily as well as ensure program participants are following workforce management procedures.

### **Work Location Procedures and Precautions**

The following are the procedures and precautionary measures that will be implemented in the work location to mitigate the transmission of Covid-19 to all personnel.

- Any individual presenting respiratory symptoms, fever, and/or meet the criteria developed by EEI to be categorized as a risk to human health, as it relates to Covid-19, will be denied access to EEI's sites and vehicles. Affected individuals will be mandated to proceed with recommended precautions and subject to a 14-day quarantine.

- Staff will complete EEI's Safety Form/Location Access Questionnaire form prior to gaining access to EEI's sites, vehicles, or community sites each day.
- Individuals will be required to take breaks, lunches, and meetings in assigned areas.
- All individuals will be required to participate in sanitizing tables, doorknobs, handles, and other common touch points used following each visit.

### **Reporting Procedures and Confirmed Cases**

In the event of any of the following, reporting and response policies will be followed to minimize exposure and transmission of Covid-19. Notification of any of these events shall be conducted immediately.

- A confirmed case of Covid-19 for a program participant, employee, or person living with a program participant or employee.
- An individual is denied access to EEI facilities, vehicles, and community sites or is removed from a site for fever or symptoms associated with Covid-19.
- Notice of an individual being otherwise impacted by Covid-19.

The reporting procedure is as follows:

- The Executive Director and the Business Director shall be immediately notified.

In the event of a positively confirmed or suspected case of Covid-19:

- If the affected person is offsite, the affected person will be instructed to stay home and will not be allowed onsite.
- If the affected person had been onsite in the last 48 hours prior to the onset of symptoms, protocols below for onsite affected person will also be implemented.
  - The affected person will immediately be removed from the site.
  - EEI will ensure that staff coverage is in place if an employee becomes ill during program hours.
  - The Executive Director or Business Director will gain an understanding of potential locations and individuals the affected person had been in contact with from 48 hours prior to the onset of symptoms/confirmed test or start of quarantine. This will be done through a phone conversation with the individual or the individual's residential provider/guardian.
  - All individuals who had prolonged close contact (less than six feet apart for more than fifteen minutes per day including repeated contacts totaling fifteen minutes within 24 hours.) with a positively-tested or symptomatic person within 48 hours before the onset of symptoms will be removed from sites as well and will self-monitor for symptoms of Covid-19 for 14 days prior to being allowed back on site (symptom free).
  - After an orderly and safe shutdown of EEI's affected area, the site will be locked down while it is determined what areas may have been impacted and who may have been

exposed. EEI's Executive Director and Business Director will lead this investigation and decision-making process.

- After the investigation has been completed, individuals determined to not have been affected can continue working onsite so long as it does not impact sanitizing efforts, there are adequate employees to meet program participant/staff ratios, and it is approved by EEI leadership.
- All affected or potentially affected areas will be thoroughly wiped with an approved sanitizing chemical.
- EEI will use a symptom-based strategy for determining when individuals can return to work. Individuals with mild to moderate illness who are not severely immune-compromised may return if at least 10 days have passed since symptoms first appeared, at least 24 hours have passed since last fever without the use of fever-reducing medications, and symptoms (e.g., cough, shortness of breath) have improved. Individuals who are not severely immunocompromised and were asymptomatic throughout their infection may return to work when at least 10 days have passed since the date of their first positive viral diagnostic test. Individuals with severe to critical illness or who are severely immunocompromised may return after at least 10 days and up to 20 days have passed since symptoms first appeared, at least 24 hours have passed since last fever without the use of fever-reducing medications, and symptoms (e.g., cough, shortness of breath) have improved. Individuals who are severely immunocompromised, but who were asymptomatic throughout their infection may return to work when at least 10 days and up to 20 days have passed since the date of their first positive viral diagnostic test. Determination will be made on a case-by-case basis following the CDC guidelines.

### **Leave Policies and Reporting**

EEI has leave policies that promote workers staying at home when they are sick, when household members are sick, or when required by a health care provider to isolate or quarantine themselves or a member of their household. During these times you will utilize your Paid Time Off, Emergency Paid Sick Leave, and Expanded Family Medical Leave (Act). These leaves may run concurrently. Accommodations for workers with underlying medical conditions who are at risk or who have household members with underlying health conditions have been implemented. We will make any necessary accommodations except when it causes undue hardship to EEI. This may include working at a site with limited exposure to others, working remotely, or schedule change.

EEI's Executive Director or Business Director will inform employees and program participants immediately if they have been exposed to a person with Covid-19 at their workplace. The exposed individuals will be required to quarantine for 14 days.

EEl will ensure all employee and program participant emergency contact information is up to date.

EEl will protect the privacy of employees’ or program participants’ health status and health information as required by the Health Insurance Portability and Accountability Act and data privacy rules.

**Best Practices Being Continuously Implemented at EEl’s Site**

- **Encourage sick employees and program participants to stay home.** Anyone with symptoms (fever, cough, shortness of breath) should notify his or her supervisor and stay home.
- **Social Distancing.** Avoid congregating and gatherings. Always maintain a minimum distance of at least six feet from others. Common areas are marked or arranged to provide for social distancing of six feet (floor markings, appropriately distanced seating, chairs not facing one another.) Whenever possible, EEl will refrain from intermixing groups. If intermixing of groups becomes necessary, the number of groups that intermix will be limited. The intermixing of groups will be documented (date, time, program participants, and employees). If someone in a group is confirmed to have Covid-19, all members of the group are considered a close contact and must not attend EEl for 14 days. If EEl offers remote services as a service option, it will be discussed with program participants. When possible, physical space will be increased between employees and program participants using partitions and barriers of sufficient dimension and appropriate material (plexiglass, taught heavy plastic curtains stretched and secured). Restroom capacity will be limited; waiting areas for the restrooms will be marked. Maximum shift lengths will be in accordance with Minnesota Department of Health and Human Services guideline. When on routes and outings, drivers and program participants must wear masks. Extra clean masks will be available for those who do not have their own. If a program participant refuses to wear a mask due to cognitive ability to understand and comply, the individual will sit in the front passenger seat. If the program participant can comply, but refuses, the program participant should not be allowed on the vehicle. The chart below demonstrates vehicle seating arrangements with social distancing:

15 Passenger Vans		
Driver		Passenger
Empty	Passenger	Empty
Passenger	Empty	Passenger
Empty	Passenger	Empty
Passenger	Empty	Passenger

Mini Van		
Driver		Passenger
Passenger		Passenger
Empty	Passenger	Empty

Similar seating patterns limiting the number of riders should be followed on the buses. The driver must sanitize surfaces of the vehicle prior use.

- **Arrivals and Departures.** The arrival and departure of employees and program participants will be staggered so large groups of people do not congregate during these times. Multiple entrances/exits will be used for employees and program participants when it is safe to do so. Areas will be clearly marked for pickup and drop-off. The number of people accompanying the program participant will be limited. EEI will also limit the use of shared items for checking in (i.e., pens).
- **Meetings.** Large mass meetings will continue to be held remotely through Zoom or another virtual meeting provider.
- **Mobile Devices/Shared Computers.** Mobile devices and computers will not be shared unless sanitized before and after each use and after any visit to another site.
- **Lunch/Break.** All individuals must maintain six feet from other individuals while eating lunch or taking breaks. Lunches and breaks will be staggered to maximize social distancing. Consistent groups will be maintained during lunches and breaks.
- **Food and Meals.** Food, including condiments, and beverages may not be shared.
- **Cleaning and Disinfecting.** EEI follows CDC and MDH guidance for frequent cleaning of our spaces, especially program spaces. Regular housekeeping practices are being implemented, including daily routine cleaning and disinfecting of work surfaces, equipment, tools and machinery, vehicles, and areas in common areas including restrooms, lunch areas, meeting rooms, and offices. All individuals on site will be expected to participate in extra cleanings for frequently touched surfaces (light switches, tables, chairs, door handles, etc.). Frequent cleaning and disinfecting will be conducted in high-touch areas, such as phones, keyboards, touch screens, controls, door handles, copy machines, etc. EEI's Employment Services Coordinator supervises all cleaning. A documented sanitation checklist identifying surfaces and equipment to be sanitized, the agent used, and the frequency at which sanitation occurs is utilized. Appropriate and effective cleaning and disinfecting supplies have been purchased and are available for use in accordance with product labels, safety data sheets, and manufacturer specifications and are being used with required personal protective equipment for the product. EEI uses Occupational Health and Safety Administration approved disinfecting chemicals. Face masks and gloves are used while cleaning. The use of shared supplies that cannot be sanitized will be minimized (e.g., arts and craft supplies, office supplies).
- **Ventilation.** EEI will work to maximize the amount of fresh air being brought into its buildings, limit air recirculation, and ensure ventilation systems are properly used and maintained. EEI will also take steps to minimize air flow blowing across people. Portable fans will not be used.
- **Hand Washing.** Employees and program participants are instructed to wash their hands for at least 20 seconds with soap and water frequently throughout the day, but especially at the beginning and end of their shift, prior to any mealtimes, after using the toilet, after nose blowing, coughing, or sneezing, and after being in a public place. Paper towels are provided, and trash receptacles are placed by bathroom doors so paper towels can be readily

disposed of when operating doors. All customers and visitors to the workplace will be required to wash or sanitize their hands prior to or immediately upon entering the facility. Handwash stations will be maintained with soap and paper towels. Hand-sanitizer dispensers (that use sanitizers of greater than 60% alcohol) are at entrances and locations in the workplace so they can be used for hand hygiene in place of soap and water as long as hands are not visibly soiled. Handwashing signs are posted.

- **Respiratory Etiquette.** Employees, program participants, and visitors are being instructed to cover their mouth and nose with their sleeve or a tissue when coughing or sneezing and to avoid touching their face (in particular, their mouth, nose, and eyes) with their hands. They should dispose of tissues in provided trash receptacles and wash or sanitize their hands immediately afterward. “Cover Your Cough” signs are posted. Tissues are provided for proper cough/sneeze etiquette as well as not-touch disposable containers.
- Respiratory etiquette will be demonstrated on posters posted throughout EEI sites and supported by making tissues and trash receptacles available to all employees, program participants, and visitors.
- **Drinking Fountains.** Drinking fountains will not be used.
- **Personal Protective Equipment.** All individuals will maintain proper personal protective equipment. Do not share personal protective equipment. EEI will provide personal protective equipment. Reusable personal protective equipment will be sanitized per manufacturer’s recommendation before and after each use. Personal protective equipment must be disposed of properly.

### **Communications and Training.**

This Plan was initially communicated through distribution to all employees and placed in EEI’s communication binder on May 18, 2020. Necessary training was provided at that time. On June 8, 2020, during a staff training day, the Plan was reviewed, and staff had the opportunity to make additional recommendations. Additional communication and training will be ongoing and provided to all workers who did not receive the initial training. This Plan will be in the staff communication binder for employee access. If at any time, an employee becomes aware of a situation not covered in this policy, the employee is asked to see the Executive Director or Business Director. If the Plan needs revisions, changes will be made and communicated.

Managers and leadership are to visually monitor how effective the program has been implemented. Management and employees are to work through this Plan together and update the training as necessary. This Covid-19 Plan has been certified by EEI management and was initially posted throughout the workplace May 18, 2020. It was reviewed again on June 8, 2020. It will continue to be updated as necessary. This Plan was revised on June 19, 2020, and placed in the staff communication binder for review. On December 18, 2020, this plan was revised and placed in the staff communication binder for review.

Employees with concern about this Plan or questions about their rights may contact MNOSHA Compliance at [osha.compliance@state.mn.us](mailto:osha.compliance@state.mn.us) (651-284-5050 or 877-470-6742).



**Residences.**

Residences will be required to certify they will not allow program participants to enter EEI vehicles or sites if the program participant is experiencing any Covid-19 symptoms. Residences must also provide adequate contacts to allow prompt removal of a program participant from EEI’s site if a program participant becomes ill while at EEI. Persons living in a congregate setting may attend if the congregate setting has not had any Covid-19 exposure in the last 14 days.

**Visitors and Customers.**

Visitors and customers will also be advised not to enter EEI if they are experiencing symptoms or have contracted Covid-19. Posters will be at each entrance informing people to not enter if they are experiencing Covid-19 symptoms, to wash or sanitize their hands upon arrival, to wear face covering whenever possible, and to adhere to hygiene and social distancing instructions, signage, and markings. The poster will also indicate that screening for Covid-19 symptoms by staff is required prior to or immediately after entry. Staff will be available to answer questions.

Instructions will be communicated to visitors and customers about how to drop off and pick up individuals and drop off recyclables.

Certified \_\_\_\_\_ (Executive Director) Date \_\_\_\_\_

**EEL'S SAFETY FORM LOCATION ACCESS QUESTIONNAIRE  
EMPLOYEE/PROGRAM PARTICIPANT SCREENING**

For the safety and security of our employees, **EVERYONE must answer the questions below** in order to enter an EEL vehicle, facility, or community site. These questions must be answered **each time** you enter.

1. Have you been within six feet for ten minutes or more of someone diagnosed with Covid-19 in the last 14 days?
  
2. Do you live with someone who has been diagnosed with Covid-19 and is under quarantine?
  
3. Are you currently or have you in the last three days, experienced any cold or flu-like symptoms, including **fever at or above 100.4 degrees Fahrenheit, cough, shortness of breath or difficulty breathing, chills, muscle pain, sore throat, or new loss of taste or smell?** (Not associated with allergies and not treated by a doctor where a return-to-work release was issued.)

I have reviewed and agree to follow EEL's Covid-19 Pandemic Response Action, Prevention, and Preparedness Plan.

Signature	Date
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