

# Emil Rummel Agency, Inc.

## COVID-19 Preparedness and Response Plan

In accordance with Executive Order 2020-97, Emil Rummel Agency, Inc. (“Company”) institutes this COVID-19 Preparedness and Response Plan (“Plan”) adopted by Company on May 12<sup>th</sup>, 2020.

Company aims to protect its workforce by enacting all appropriate prevention efforts. Company is continually monitoring guidance from local, state, and federal health officials and implementing workplace and Plan modifications where appropriate.

*Italicized* words and phrases are described in the definitions section—page 12.

Employees with questions may contact Shelby Shea, Human Resources Manager via phone at 989-652-6104 or email at [sshea@rummelinsurance.com](mailto:sshea@rummelinsurance.com). She is responsible to implement, monitor, and report on COVID-19 control strategies below.

### 1. Prevention Efforts and *Workplace Controls*

#### a. Cleanliness and *Social Distancing*

Employees who are able to perform their essential duties remotely may be permitted to work from home in accordance with approved *telework* arrangements.

For workers directed to report *on-site*, Company abides by the recommended *social distancing* and other safety measures and establishes the following:

- *Large gatherings* are minimized whenever possible; staff meetings are postponed, cancelled or held remotely;
- Employees are *encouraged* to maintain *physical distance* even when on break, as well as before and after working hours;
- Employees are *required* to maintain *physical distance* when reporting to work and leaving work;
- Employees’ work stations are no fewer than six feet apart—unless separated by a physical barrier such as a wall or cubicle wall;
- Company may utilize flexible work hours, wherever possible, to limit the number of employees simultaneously working *on-site*;
- Employees’ interactions with the *general public* are modified to allow for additional physical space between parties; and
- Non-essential travel is postponed or cancelled.

Company provides employees with, at a minimum, non-medical grade face coverings and *requires* their use for certain *on-site* and *off-site* job activities. Face coverings shall be worn when employees cannot consistently maintain six feet of separation from others.

In addition, Company is instituting the following cleanliness measures:

- Where possible, increasing ventilation rates and circulation throughout *work sites*;
- Performing *routine environmental cleaning* and disinfection, especially of common areas; and
- Where available, providing hand sanitizer in high-traffic areas.

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Employees are expected to minimize COVID-19 exposure by:

- Cleaning work stations at the beginning and end of each shift;
- Avoiding, when possible, the use of other employees' phones, desks, offices, or other work tools and equipment;
- Frequently washing hands with soap and water for at least 20 seconds;
- Utilizing hand sanitizer when soap and water are unavailable;
- Avoiding touching their faces with unwashed hands;
- Avoiding handshakes or other physical contact;
- Avoiding *close contact* with sick people;
- Practicing respiratory etiquette, including covering coughs and sneezes;
- Immediately reporting unsafe or unsanitary conditions on Company premises;
- Complying with Company's daily screening processes;
- Seeking medical attention and/or following medical advice if experiencing COVID-19 symptoms; and
- Complying with self-*isolation* or *quarantine* orders.

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

An employee with a COVID-19 diagnosis or who displays symptoms consistent with COVID-19 must remove himself or herself from the *work site* immediately and report it to the onsite supervisor or other supervisory employee.

In response to a confirmed diagnosis or display of COVID-19 symptoms, Company:

- Informs all employees *with and near* whom the diagnosed/symptomatic employee worked of a potential exposure;
- Keeps confidential the identity of the diagnosed/symptomatic employee; and
- Conducts *deep cleaning* of the diagnosed/symptomatic employee's workstation, as well as those common areas potentially infected by the employee or a *visitor*; and
- Notifies the local public health department when an employee is identified with a confirmed case of COVID-19 within 24 hours.

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

Company completes an OSHA Form 300, as well as a Form 301, "if it is more likely than not that a factor or exposure in the *workplace* caused or contributed to the illness." If an employee infects a coworker, the coworker has suffered a work-related illness as defined by OSHA if one of the recording criteria (e.g., medical treatment or days away from work) is met.

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### c. Worker Exposure Classification

Employees' "worker exposure" is classified as medium risk by the Occupational Safety and Health Administration's guidance because they frequently and/or closely interact with the *general public*.

Given this classification, Company provides the following controls in addition to the above-summarized prevention efforts: installing physical barriers where feasible, limiting exposure to the *general public*, and minimizing face-to-face contact without the appropriate *PPE*.

## 2. Identification and *Isolation* of Sick and/or Exposed Employees

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

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

### a. Employees' Self-Monitoring

The following employees should **not** report to work and, upon notification to Company, will be removed from the *regular work* schedule:

- Employees who have tested positive for COVID-19, whether or not accompanied by COVID-19 symptoms;
- Employees who display COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting, whether or not accompanied by a formal COVID-19 diagnosis;
- Employees who, in the last 14 days, *outside of work* have had *close contact* with and/or live with any person having a confirmed COVID-19 diagnosis; or
- Employees who, in the last 14 days, *outside of work* have had *close contact* with and/or live with any person displaying COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, chills, repeated shaking with chills, muscle pain, headache, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting; or
- Employees who, in the last 14 days, *while at work* have had *close contact* with any person having a confirmed COVID-19 diagnosis or displaying any of the aforementioned COVID-19 symptoms, unless separated by more than 6' **and** wearing the appropriate *PPE* as defined by industry best-practices standards or government mandate.

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

### b. Daily Screenings

To prevent the spread of COVID-19 and reduce the potential risk of exposure, Company screens employees on a daily basis.

Employees are asked the following questions before entering the *worksite*:

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- Are you currently suffering from any of the following symptoms – fever 100.5F or above, cough, shortness of breath, sore throat, new loss of smell or taste, chills, repeated shaking with chills, muscle pain, headache, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting?
  - If yes, access is denied, and employee is advised to *self-isolate/self-quarantine* at home, until employee is permitted to return to *regular work* as defined below.
- Have you lived with, or had *close contact* with someone *outside of work*, in the last 14 days diagnosed with or displaying the symptoms of COVID-19?
  - If yes, access is denied, and employee is advised to *self-isolate/self-quarantine* at home, until at least 14 days after the *close contact*.
- Have you traveled by car, bus, train or boat out of state or traveled via airplane internationally or domestically or used public transportation in the last 14 days?
  - If yes, access is denied, and employee is advised to *self-isolate/self-quarantine* at home, until at least 14 days.

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

### c. Return-to-Work Requirements

Employees who were themselves diagnosed with COVID-19, or displaying symptoms of COVID-19, may continue working remotely but may only return to *regular work* upon confirmation of the cessation of symptoms and contagiousness, proof of which may be acquired via the test-based strategy or the non-test-based strategy.

1. The test-based strategy is preferred but relies upon the availability of testing supplies and laboratory capacity. Under this strategy, employees may discontinue *isolation* and return to *regular work* upon achieving the following conditions:

- Resolution of fever without the use of fever-reducing medications;
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); **and**
- Negative results of an FDA Emergency Use Authorized molecular assay for COVID-19 from two consecutive nasopharyngeal swab specimens collected at least 24 hours apart.

2. Under the non-test-based strategy, employees may discontinue *isolation* and return to *regular work* upon achieving the following conditions:

- At least 3 days (72 hours) have passed since recovery defined as resolution of fever without the use of fever-reducing medications;
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); **and**
- At least 7 days have passed since symptoms first appeared and have since discontinued.

Employees who came into *close contact* with, or live with, an individual with a confirmed diagnosis or symptoms, the employee may return to *regular work* after either 14 days have passed since the last *close contact* with the diagnosed/symptomatic individual, or the diagnosed/symptomatic individual receives a negative COVID-19 test. If the employee displays symptoms, the employee may return to *regular work* after the employee has complied with either the test-based strategy or the non-test-based strategy defined above.

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Employees are typically *required* to submit a release to return to *regular work* from a healthcare provider; given the current stressors on the healthcare system, Company may accept written statements from employees confirming all the factors supporting their release.