



**Sue Ellen Eisenberg & Associates, P.C.**

**COVID-19  
PREPAREDNESS AND  
RESPONSE PLAN**



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# INTRODUCTION

We have not experienced anything like the spread of the novel coronavirus (“COVID-19”) in our lifetimes. In order to address the “new normal” we face as a result of COVID-19, and to comply with relevant state and local orders, Sue Ellen Eisenberg & Associates, P.C. (“SEEA”) has prepared the following COVID-19 Preparedness and Response Plan (the “Plan”). This Plan may be updated when necessary based on the issuance of local, state, and federal orders or guidance related to COVID-19.

SEEA recognizes that important matters must be addressed regarding the safety of employees as well as its clients. This Plan reflects the additional measures SEEA has taken to ensure the safety of those individuals. It will also be uploaded to SEEA’s website.

## SAFE WORK PRACTICES

### ***Remote Work***

When executive orders or other governmental directives prohibit nonessential employees from in-person work, those employees will be allowed to work remotely to the extent their job duties allow. When no such orders or directives prohibit in-person work, employees may still be allowed to work remotely at SEEA’s discretion and depending on each individual employee’s circumstances.

### ***COVID-19 Risk Assessment***

Utilizing the Occupational Safety and Health Administration (“OSHA”)’s *Guidance on Preparing Workplaces for COVID-19*, SEEA has determined that all employee positions are classified as “lower exposure risk.” The basis for this determination is that employees are not required to be in contact with people known to be, or suspected of being, infected with COVID-19, nor are they required to be in frequent close contact (within six feet) of the general public.

### ***Personal Protective Equipment (“PPE”)***

SEEA will provide PPE designed to ensure employee safety, including face masks. Hand sanitizer and disinfectant wipes will also be provided to employees. SEEA will strictly enforce all employee safety measures as recommended by the Centers for Disease Control and Prevention (“CDC”). All employees, unless medically unable to do so, will wear a face mask in all enclosed public spaces when more than one employee is present and when social distancing (six feet of separation) cannot be maintained.<sup>1</sup>

### ***Reporting of Unsafe or Unsanitary Conditions***

Employees are expected to immediately report unsafe or unsanitary conditions.

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<sup>1</sup> If you claim that you are medically unable to wear a face mask or face shield, SEEA may require confirmation of your medical condition from your physician.

# BASIC INFECTION PREVENTION MEASURES

While SEEA employees work in an environment that can allow for appropriate social distancing, common areas present an increased risk of exposure. For these areas, proper hygiene and sanitizing procedures are required.

## ***Hygiene***

Employees are to wash their hands frequently (for a minimum of 20 seconds), cover their coughs and sneezes, and avoid touching their faces. SEEA will provide employees with access to hand sanitizer, tissues, and trash receptacles. SEEA prohibits shaking hands with others.

## ***Cleaning and Disinfecting***

Increased cleaning and disinfecting of work surfaces and equipment will be performed routinely. SEEA will provide employees with access to disposable disinfectant wipes for cleaning any commonly used surfaces before each use including doorknobs and handles, tables, desks and counter surfaces, light switches, keyboards, keypads, copier surfaces, printers, and telephones.

Employees also should not use others' phones, desks, offices, or work tools and equipment. When it is not possible to avoid sharing such items or spaces, employees must use disinfectant wipes or cleaners to sanitize all items and spaces used prior to sharing them with other employees.

In the event an employee that has been in the workplace in the past 14 days tests positive for COVID-19, SEEA will undertake appropriate cleaning and disinfecting measures based on its consultation with a certified infectious disease organization trained in disinfecting for COVID-19.

## ***Social Distancing***

Employees are to abide by social distancing guidelines as much as possible. When employees are unable to maintain social distancing for extended periods of time, PPE must be worn.

## ***Meetings***

Until further notice, virtual meetings with clients or other attorneys will replace face-to-face meetings.

# ADDITIONAL WORKPLACE PROTECTIONS

## ***Physical Barriers and Signage***

SEEA has determined, based upon its office configuration, that there is no need for physical barriers to be installed. SEEA may post a variety of signs in the office, including:

- Maintain social distancing of 6' between individuals
- Please wear a face mask upon entry
- No handshaking
- Proper hand washing techniques
- How to stop the spread of germs
- Please clean surface after use

***Visitors***

Non-essential visitors will not be permitted into SEEA's premises. Individuals dropping off mail and/or packages will be required to wear masks and will not be permitted in any office or the common area.

***Working with Insurance Companies and State and Local Health Agencies***

SEEA will work with applicable insurance companies and state and local health agencies to provide information regarding medical care in the event of a COVID-19 outbreak.

***Following Existing OSHA Standards***

SEEA will continue to adhere to all applicable existing OSHA standards and requirements.

***Recordkeeping***

SEEA shall maintain the required recordkeeping under Governor Whitmer's Executive Orders. The following records are required to be maintained:

- Employee training.
- A record of daily entry self-screening protocol for all employees or visitors entering the workplace, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19.
- When an employee is identified with a confirmed case of COVID-19, any required notifications that are made.

## **PROMPT IDENTIFICATION AND ISOLATION OF SICK INDIVIDUALS**

***Employee Screening Before Entering the Workplace***

At the beginning of each day, SEEA will screen employees for symptoms of COVID-19. Employees are to report promptly any symptoms of COVID-19. Appendix A includes a sample Employee Entry Screening Questionnaire.

SEEA will prohibit any employee who fails the screening process from entering the premises until allowed to return to work under pertinent medical guidelines. A healthcare provider's note is not required prior to the employee's return to work (although the employee must still meet the relevant criteria to return to work).

***Self-Monitoring for Symptoms***

SEEA strongly encourages employees to self-monitor for symptoms of COVID-19 every day prior to reporting for work. Coughing, shortness of breath, and difficulty breathing are common symptoms of COVID-19. The CDC has advised that other symptoms include fever, chills (with or without shaking), muscle pain, headache, diarrhea, sore throat, and new loss of taste or smell.

# PROCEDURES FOR REPORTING ILLNESS

## *Suspected Cases*

An employee will be considered to have a Suspected Case of COVID-19 if:

- He or she is experiencing any of the following symptoms:
  - Fever;
  - Shortness of breath;
  - Continuous cough;
  - Chills (with or without shaking);
  - Muscle pain;
  - Headache;
  - Diarrhea;
  - Sore Throat; and/or
  - New loss of taste or smell.
- He or she has been exposed to a COVID-19 positive person, meaning:
  - In the last 14 days, the employee came in close contact with, or lives with, someone who has tested positive for COVID-19 or who has displayed COVID-19 symptoms.

If an employee believes he or she qualifies as a Suspected Case, the employee must:

- Immediately notify SEEA via telephone, text message, or email;
- Self-quarantine for 14 days; and
- Seek immediate medical care or advice.

If an employee qualifies as a Suspected Case, SEEA will:

- Notify all employees who may have come into close contact (being within approximately six feet for a prolonged period of time without PPE) with the employee in the past 14 days (while not disclosing the identity of the employee), and allow those employees to work from home as they monitor for COVID-19 symptoms; and
- Ensure that the employee's work area is thoroughly cleaned.

## *Confirmed Cases*

SEEA will consider an employee a Confirmed Case of COVID-19 if he or she has performed in-person operations at SEEA in the past 14 days and has tested positive for COVID-19.

If an employee believes he or she qualifies as a Confirmed Case, the employee must:

- Immediately notify SEEA via telephone, text message or email;
- Remain out of the workplace until cleared to return to work.

If an employee qualifies as a Confirmed Case, SEEA will:

- Within 24 hours, notify the Oakland County Health Department as well as any co-workers who may have come into contact with the employee (while not disclosing the employee's identity);
- Notify 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) in the past 14 days (while not disclosing the identity of the employee to ensure the individual's privacy) and allow those employees to work from home as they monitor for COVID-19 symptoms;
- Ensure that the entire workplace, or affected parts (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, SEEA's cleaning/disinfecting plans, and when the workplace will reopen.

SEEA will permit employees to return to work provided that:

- If an employee **will not** have a test to determine whether he or she is contagious, the employee has had no fever for at least 72 hours (without the use of fever-reducing medication), respiratory symptoms have improved, and ten (10) days have passed since symptoms first appeared; OR
- If an employee **will** have a test to determine whether he or she is contagious, the employee no longer has a fever (with the use of fever-reducing medication), respiratory symptoms have improved, and the employee received two negative tests in a row at least 24 hours apart.

SEEA will not discharge, discipline, or otherwise retaliate against employees who stay home or who leave work when they are at particular risk of infecting others with COVID-19.

## CORRECTIVE CONTROLS

SEEA will communicate controls governing facility access by posting visual indicators throughout the building and outside at ingress points.

SEEA will address other working condition changes that include remote or telework and leave time as it applies to the Emergency Paid Sick Leave Act (EPSLA) and the Emergency Family and Medical Leave Expansion Act (EFMLEA).

## ADMINISTRATIVE CONTROLS

### *Worksite Supervisor*

SEEA has designated its Paralegal/Office Coordinator as its Worksite Supervisor. He will implement, monitor, and report on the COVID-19 control strategies developed under this Plan. The Worksite Supervisor will be present at all times when employees are onsite. An onsite

employee may be designated to perform this role to ensure compliance with all COVID-19 control strategies.

SEEA will train its Worksite Supervisor in his COVID-19 related responsibilities. COVID-19 control strategies include all safety measures imposed as outlined within this Plan, proper wearing of PPE, personal hygiene, use of hand sanitizer and disinfecting wipes, social distancing, and other strategies designed to maintain employee and visitor safety.

### ***Employee Training***

SEEA will coordinate and provide training to employees related to COVID-19 which will address the following topics:

- Symptoms of COVID-19.
- How COVID-19 is transmitted from person to person and distance that the virus can travel in the air, as well as the time it remains viable in the air and on environmental surfaces.
- Steps employees must take to notify SEEA of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
- Measures SEEA is taking to prevent exposure to the virus, as described in this Plan.
- Rules that employees must follow in order to prevent exposure to and spread of the virus.
- The use of PPE including the proper steps for putting it on and taking it off.
- Proper hand washing techniques.
- How to report unsafe working conditions.
- How to manage symptomatic customers upon entry or in the store.

Training resources include the following videos:

- Your COVID-19 questions answered (a webinar):  
<https://www.youtube.com/watch?v=kbnW5xnH7eI>
- The use of PPE, including proper steps for wearing and removal:  
<https://www.youtube.com/watch?v=MA9CC-OfBV8&feature=youtu.be>
- Proper handwashing technique:  
<https://www.youtube.com/watch?v=IisgnbMfKvI&feature=youtu.be>



## APPENDIX A

### SEEA EMPLOYEE COVID-19 SCREENING FORM

In order to access SEEA, I affirm:

\_\_\_\_\_ I do not have a fever (100.4 degrees F or 38 degrees C), cough, shortness of breath, sore throat, chills, shaking with chills, muscle pain, headache, diarrhea, or a new loss of taste or smell

\_\_\_\_\_ I have had no close contact in the last 14 days with someone with a diagnosis of COVID-19. The CDC defines close contact as being within approximately 6 feet of a COVID-19 case for a prolonged period of time. Close contact can occur while caring for, living with, visiting, or sharing a healthcare waiting area or room with a COVID-19 case; or having direct contact with infectious secretions of a COVID-19 case (e.g., being coughed on)

\_\_\_\_\_ I have not traveled internationally or on a cruise ship in the last 14 days

\_\_\_\_\_ I further affirm that if I answer “yes” to any of the above screening questions, I am excluded from accessing SEEA until:

- 3 days with no fever and 10 days since symptoms first appeared
- 14 days if close contact with a diagnosed case of COVID-19
- 14 days following travel

\_\_\_\_\_ I will wear a face covering while in any public spaces within SEEA when social distancing cannot be maintained.

\_\_\_\_\_ Date

\_\_\_\_\_ Employee Name (print)

\_\_\_\_\_ Employee Signature

Time In: \_\_\_\_\_

Time Out: \_\_\_\_\_

APPENDIX B  
SIGNS FOR OFFICE

## HOW TO DO SOCIAL DISTANCING

 <p><b>NO HANDSHAKES</b></p>	 <p><b>KEEP YOUR DISTANCE 6 FEET</b></p>
 <p><b>WORK REMOTELY</b></p>	 <p><b>AVOID CROWDS</b></p>
 <p><b>WHEN SICK STAY HOME</b></p>	 <p><b>WASH YOUR HANDS</b></p>

## IN THE WORKPLACE



## APPENDIX C

### OTHER RESOURCES

Occupational Safety and Health Administration website: [www.osha.gov](http://www.osha.gov)

Centers for Disease Control and Prevention website: [www.cdc.gov](http://www.cdc.gov)

National Institute for Occupational Safety and Health website: [www.cdc.gov/niosh](http://www.cdc.gov/niosh)

Governor Whitmer's Executive Orders:

[https://www.michigan.gov/coronavirus/0,9753,7-406-98178\\_98455-521682--,00.html](https://www.michigan.gov/coronavirus/0,9753,7-406-98178_98455-521682--,00.html)

Helpful CDC Guidance:

<https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>

CDC Handwashing Fact Sheet:

<https://www.cdc.gov/handwashing/pdf/hand-sanitizer-factsheet.pdf>

CDC Fact Sheet and Poster on Preventing the Spread of Germs:

<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention-H.pdf>

<https://www.cdc.gov/coronavirus/2019-ncov/downloads/stop-the-spread-of-germs-11x17-en.pdf>

CDC Fact Sheet on What to Do if You Are Sick:

<https://www.cdc.gov/coronavirus/2019-ncov/downloads/sick-with-2019-nCoV-fact-sheet.pdf>

CDC Poster for Entrance Reminding Employees Not to Enter When Sick:

<https://www.cdc.gov/coronavirus/2019-ncov/downloads/stayhomefromwork.pdf>

CDC Guidance on Reopening Businesses:

<https://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html>

## APPENDIX D

### WORKSITE SUPERVISORS COVID-19 CONTROL STRATEGIES TO BE MONITORED

In accordance with Executive Order 2020-97, all businesses must designate worksite supervisors who are responsible for implementing, monitoring and reporting on COVID-19 control strategies. The supervisor must remain onsite at all times when employees are present on the site. A worksite supervisor may designate other employee(s) to perform the supervisory role.

#### **SEEA's COVID-19 Control Strategies Worksite Supervisor will:**

1. Observe employees and others for symptoms of COVID-19, including fever, shortness of breath, continuous cough; or two of the following symptoms: fever, chills, repeated shaking with chills, muscle pain, headache, diarrhea, sore throat, or new loss of taste or smell.
2. Immediately isolate employees or visitors displaying symptoms of COVID-19, by sending the employee home or directing the visitor to leave the building.
3. Inform SEEA of an individual displaying symptoms of COVID-19, which will then notify all employees of a possible suspected case.
4. Ensure employee and visitor screening takes place before entering the office.
5. Ensure that visitors only access areas for which they have been authorized.
6. Ensure the use of PPE; *i.e.*, a face mask, when entering and exiting the building and while in enclosed public spaces.
7. Ensure social distancing of six feet or greater between employees or others in the building. When this cannot be achieved, those individuals will wear PPE, such as a face mask.
8. Monitor for frequent hand washing and use of hand sanitizer.
9. Ensure the use of disinfecting wipes to clean frequently touched surfaces.
10. Monitor that there is no sharing of telephones, computers, etc., among individuals and if there is, that employees use disinfecting wipes before or after sharing.
11. Monitor that individuals are not shaking hands.
12. Ensure that employees travel alone in vehicles when performing work-related travel.
13. Encourage employee reporting of unsafe working conditions to any manager or director.