



## **RETURN TO WORK PLAN**

MMI takes the health and safety of our employees and the people we serve very seriously. With the spread of the coronavirus or “COVID-19,” a respiratory disease caused by the SARS-CoV-2 virus, we all must remain vigilant in mitigating the outbreak. In order to return to work safely, we have developed this plan to be implemented throughout MMI and at all of our community sites. We have also identified a team of employees to monitor available U.S. Center for Disease Control and Prevention (“CDC”) and Occupational Safety and Health Administration (“OSHA”) guidance on the virus.

This plan is based on currently available information from the CDC and OSHA, and is subject to change based on further information provided by these and other regulatory agencies. MMI may also amend this plan based on operational needs.

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### **I. Responsibilities of Managers and Directors**

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All managers and directors must be familiar with this Plan and be ready to answer questions from employees. Managers and directors must set a good example by following this Plan at all times. This involves practicing good personal hygiene and jobsite safety practices to prevent the spread of the virus. Managers and directors must encourage this same behavior from all employees. Managers and directors are responsible for assuring each individual they supervise has received a copy of this plan and the training about returning to work safely (see Attachment B).

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### **II. Responsibilities of Employees**

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All employees are expected to help with our prevention efforts while at work. In order to minimize the spread of COVID-19, we all play a part. As set forth below, MMI has instituted various housekeeping, social distancing, and other best practices. All employees must follow these. In addition, employees are expected to report to their managers or directors if they are experiencing signs or symptoms of COVID-19, as described below. If you have a specific

question about this plan or COVID-19, please ask your supervisor. If they cannot answer the question, please contact the CEO.

OSHA and the CDC have provided the following control and preventative guidance to all workers, regardless of exposure risk:

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes.
- Avoid close contact with people who are sick.

In addition, employees must familiarize themselves with the symptoms of COVID-19:

- Coughing;
- Fever;
- Shortness of breath, difficulty breathing; and
- Early symptoms such as chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, loss of taste or smell, and runny nose.

If you develop a fever and symptoms of respiratory illness, such as cough or shortness of breath, DO NOT GO TO WORK. Notify your supervisor and call your healthcare provider right away. Likewise, if you come into close contact with someone showing these symptoms, call your healthcare provider right away.

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### III. Risk

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Low exposure risk jobs are those that do not require contact with people known to be, or suspected of being, infected with COVID-19 nor frequent close contact with (i.e., within 6 feet of) the general public. Most employees, including managers, directors, specialists, and administrative staff fall into this group. Additional engineering controls are not recommended

for workers in the lower exposure risk group. Employers should ensure that engineering controls, if any, used to protect workers from other job hazards continue to function as intended. Please refer to MMI's Infection Control Procedure and MMI's Pandemic Flu Procedure for engineering controls already in place.

Medium exposure risk jobs include those that require frequent and/or close contact with (i.e., within 6 feet of) people who may be infected with COVID-19, but who are not known or suspected COVID-19 patients. This could include our direct support professionals and some placement or program specialists, depending on the assignment. Additional actions for these employees are as follows:

- Install physical barriers, such as clear plastic sneeze guards, where feasible.
- Assure face masks are available.

MMI does not provide services that put employees in the category of High or Very High Risk. These categories include healthcare providers who are working directly with confirmed cases or in testing sites where they have direct exposure.

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#### **IV. Job Site Protective Measures**

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MMI has instituted the following protective measures:

*A. General Safety Policies and Rules*

- All building access shall be through the front door only. Doors between the entryway and the main building will remain locked. When there is no door, signage will be in place prohibiting access. Before being granted access, all staff must complete the appropriate screening tool required by the local Community Mental Health agency or by MMI, put on a face mask, and sanitize their hands. If staff answer "yes" to any of the screening questions, they must immediately return to their vehicle and phone MMI for additional screening and instructions.
- Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave and return home. If transportation is not immediately available, the individual will be isolated in a vacant room or restroom until transportation arrives. The space will be thoroughly cleaned and disinfected after departure and MMI staff who were exposed to the individual will be quarantined as required.
- As required by Executive Order, meetings will be held by electronic conference (i.e., Zoom or Microsoft Teams) or telephone when possible. If meetings are

conducted in-person, attendance will be collected verbally and the supervisor will sign-in each attendee. Attendance will not be tracked through passed-around sign-in sheets. During any in-person meetings, there will be no gathering in groups of more than 10 people and participants must remain at least six (6) feet apart.

- Employees must avoid physical contact with others and direct other employees/persons served/visitors to increase personal space to at least six (6) feet, where possible.
- Schedules will be established to stagger breaks and lunches, if practicable, to reduce the size of any group at any one time to less than ten (10) people.
- MMI understands that due to the nature of our community-based work, access to running water for hand washing may be limited. In these situations, MMI will provide, if available, alcohol-based hand sanitizers and/or wipes.
- Staff and persons served who are working in settings where tools are used (including mops, grabbers, vacuum cleaners and more) should limit the use of shared tools and equipment. If tools must be shared, MMI will provide appropriate cleaners or sanitizing wipes to clean tools before and after use. When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
- MMI will divide crews/staff into two (2) groups where possible so that customer requirements can continue to be met effectively in the event that one of the divided teams is required to quarantine. This may mean crews will work alternating days for a longer period of time.
- MMI will designate employees into dedicated groups and employees will remain with their dedicated group until all social distancing and/or quarantine orders have expired or been rescinded. If there is a legitimate reason for an employee to change shifts, MMI managers and directors will have sole discretion in making that alteration.
- Employees are encouraged to minimize ride-sharing and to only transport persons served when no alternative is available. While in the vehicle, staff must wear a mask, maintain appropriate distancing, and ensure adequate ventilation. Air flow settings should draw in outside air and not re-circulate interior air. Windows should be opened a small amount if weather permits.
- If practicable, employees should use/drive the same vehicle every shift.

### *B. Providing Services in Community Settings*

- When providing services in community settings, staff should evaluate the specific hazards when determining best practices related to COVID-19.
- Each community employment site or community volunteer site shall have a site-specific protocol to assure the guidelines in MMI's plan are followed. When the employer's plan differs from MMI's plan, the more stringent of the two will be followed.
- When applicable to the location, staff must sanitize the space used in the location upon arrival, throughout the workday, and immediately before departure. MMI will provide appropriate cleaning products for this purpose.
- Employees should ask other people at the location to keep a personal distance of six (6) feet at a minimum. Staff and persons served should wash or sanitize hands immediately upon arrival and again before departure.

### *C. Visitors to MMI Buildings*

- The number of visitors will be limited to only those necessary for the work being performed. This would include contractors for immediate maintenance needs, funding source representatives, required inspections, pest control, and guardians of persons served for emergency needs only.
- If transportation for an early departure has arrived, the individual should remain in their vehicle and call to let us know they have arrived. MMI staff will take the individual to the vehicle.
- All visitors will be screened in advance of admittance to the building. If the visitor answers "yes" to any of the screening questions, he/she will not be permitted to access the worksite.
- Deliveries will be permitted but should be properly coordinated with the Operations Manager to assure minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles if possible.

### *D. Personal Protective Equipment and Work Practice Controls*

- In addition to regular PPE for workers engaged in various tasks MMI will also provide:

- Gloves: Gloves are to be worn when providing direct physical assistance (restrooms, meals, medication) to persons served. Staff should wash or sanitize hands immediately after removing gloves.
- Masks: Reusable or disposable masks are expected to be worn at all times when providing services unless written authorization from the department director permits an exception. MMI will provide masks, but employees may choose to use their own mask if a different style is preferred. Because N95 masks are not required or provided, employees choosing to wear them will be required to sign a statement indicating they are wearing the N95 masks voluntarily. A clean mask must be used when the assignment changes. Masks should be removed by the ties or elastic – do not touch the front of the mask. Masks should be immediately placed into a paper or plastic bag until they can be washed. Staff should wash or sanitize hands before putting on a mask and immediately after removing and storing a mask.
- Face Shields: When staff are within a physical proximity of three feet (for example, if assisting with eating or assisting in the restroom) for a prolonged period of time, a face shield must be worn in addition to a face mask.

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## **V. Cleaning and Disinfecting**

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MMI has instituted regular housekeeping practices, which includes cleaning and disinfecting frequently used tools and equipment, tabletops, door handles, restrooms, and other elements of the work environment, where possible. Please see Attachment E for specific cleaning protocols. Employees should regularly do the same in their assigned work areas.

- Work areas and break/lunchroom areas will be cleaned at least once per day. Individuals assigned to clean will be issued proper personal protective equipment (“PPE”), such as nitrile, latex, or vinyl gloves as recommended by the CDC.
- Any trash collected must be changed by someone wearing nitrile, latex, or vinyl gloves.
- Vehicles and equipment/tools should be cleaned by the designated staff before use and before change in operator or rider.
- If an employee has tested positive for COVID-19, OSHA has indicated that there is typically no need to perform special cleaning or decontamination of work environments, unless those environments are visibly contaminated with blood or other bodily fluids. Notwithstanding this, MMI will clean those areas of the

workplace that a confirmed-positive individual may have come into contact with before employees can access that workspace again.

- MMI will ensure that any disinfection shall be conducted using one of the following:
  - Common EPA-registered household disinfectant;
  - Alcohol solution with at least 60% alcohol; or
  - Diluted household bleach solutions may be used only if other options are not available and if appropriate for the surface.

Please refer to attachment F for a list of cleaners and their purpose.

- MMI will maintain Safety Data Sheets of all disinfectants used on site.

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## **VI. Exposure Situations**

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- **Employees or Persons Served Exhibiting COVID-19 Symptoms**

If an employee or person served exhibits COVID-19 symptoms, the individual must remain at home until he or she is symptom free for 72 hours (3 full days) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants). MMI will similarly require that if an individual reports to work or services with symptoms, they must return home until they are symptom free for 72 hours (3 full days). Individuals who do not drive must have emergency transportation available in case symptoms develop onsite. Emergency pickup must occur within 45 minutes of notification. MMI will not transport any person displaying symptoms. Employees or persons served are required to obtain a doctor's note clearing them to return to work when applicable.

- **Employee or Person Served Tests Positive for COVID-19**

An employee who tests positive for COVID-19 will be directed to self-quarantine away from work. The funding source will be notified as required by contract. MMI will notify any individual who may have had contact with the affected individual by phone and by letter (see Attachment C). Employees and persons served who test positive and are symptom free may return to work when at least seven (7) days have passed since the date of his or her first

positive test provided they have not had a subsequent illness. Individuals who test positive and are directed to care for themselves at home may return to work when: (1) at least 72 hours (3 full days) have passed since recovery;<sup>1</sup> and (2) at least seven (7) days have passed since symptoms first appeared. Employees that test positive and have been hospitalized may return to work when directed to do so by their medical care provider. MMI will require an employee or person served to provide documentation releasing them to return to work or services. The Director of Human Resources will notify the applicable health department immediately.

- **Employee or Person Served Has Close Contact with an Individual Who Tested Positive for COVID-19**

Anyone who has come into close contact with an individual with a confirmed-positive COVID-19 case will be directed to self-quarantine for 14 days from the last date of close contact with the individual. Close contact is defined as within six (6) feet for a prolonged period of time.

If MMI learns that an employee or person served has tested positive, MMI will conduct an investigation into who may have had contact with the confirmed-positive employee in the prior 14 days and direct those individuals that have had close contact with the confirmed-positive case to self-quarantine for 14 days from the last date of close contact with the carrier. If an individual learns that he or she has come into close contact with a confirmed-positive individual outside of the workplace, he/she must alert a manager or supervisor of the close contact and also self-quarantine for 14 days from the last date of close contact with the carrier.

If applicable, the local CMH and public health department will be notified.

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## **VII. OSHA Recordkeeping**

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If a confirmed case of COVID-19 is reported, MMI will determine if it meets the criteria for recordability and reportability under OSHA's recordkeeping rule. OSHA requires employers to record work-related injuries and illnesses that meet certain severity criteria on the OSHA 300 Log, as well as complete the OSHA Form 301 (or equivalent) upon the occurrence of these injuries. For purposes of COVID-19, OSHA also requires employers to report to OSHA any work-related illness that (1) results in a fatality, or (2) results in the in-patient hospitalization of one or more employee. "In-patient" hospitalization is defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment.

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<sup>1</sup> Recovery is defined as: (1) resolution of fever without the use of fever-reducing medications; and (2) improvement in respiratory symptoms (e.g., cough, shortness of breath).



OSHA has decided that COVID-19 should *not* be excluded from coverage of the rule – like the common cold or the seasonal flu – and, thus, OSHA is considering it an “illness.” However, OSHA has stated that only confirmed cases of COVID-19 should be considered an illness under the rule. Thus, if an employee simply comes to work with symptoms consistent with COVID-19 (but not a confirmed diagnosis), the recordability analysis would not necessarily be triggered at that time.

If an employee has a confirmed case of COVID-19, MMI will assess any workplace exposures to determine if the case is work-related. Work-relatedness is presumed for illnesses that result from events or exposures in the work environment, unless it meets certain exceptions. One of those exceptions is that the illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs *outside* of the work environment. Thus, if an employee develops COVID-19 *solely* from an exposure outside of the work environment, it would not be work-related, and thus not recordable.

MMI’s assessment will consider the work environment itself, the type of work performed, risk of person-to-person transmission given the work environment, and other factors such as community spread. Further, if an employee has a confirmed case of COVID-19 that is considered work-related, MMI will report the case to OSHA if it results in a fatality within 30 days or an in-patient hospitalization within 24-hours of the exposure incident occurring.

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### **VIII. “Essential” Industry**

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In general, services and supports to people with disabilities has been deemed essential and MMI is committed to continuing operations when needed. Essential employees are provided with a letter indicating this designation. See Attachment D for more information.

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### **IX. Confidentiality/Privacy**

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Except for circumstances in which MMI is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. When it is required, the number of persons who will be informed of an individual’s condition will be kept at the minimum needed not only to comply with legally-required reporting, but also to assure proper care of the individual and to detect situations where the potential for transmission may increase. A sample notice is attached to this plan (Attachment C). MMI

reserves the right to inform other employees or persons served that a co-worker (without disclosing the person's name) has been diagnosed with COVID-19 if the others might have been exposed to the disease so the individual may take measures to protect their own health.

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## **X. Return to Work Committee**

MMI has established an employee team, representing all job categories and all locations, to review this plan on a regular basis and to recommend updates as needed. Modifications will be recommended based on practical matters, changing guidance and regulations, and concerns.

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## **X. Worksite Supervisor**

All members of the MMI leadership team are considered to be worksite supervisors for the purpose of this plan. That means at least one member will be onsite at each building-based location when staff are present. When services are provided in community-based settings, or after-hours in an MMI building, the assigned Connections Coach or Job Coach will be the designated Worksite Supervisor. The worksite supervisor(s) are responsible for assuring all staff and persons served are in compliance with the requirements of this plan, including use of PPE and reporting requirements.

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## **XI. Reporting, General Questions, and Concerns**

Given the fast-developing nature of the COVID-19 outbreak and the changing requirements based on Executive orders, MMI may modify this plan at any time. If you have any questions concerning this plan, please contact any member of the Return to Work committee or the CEO. Concerns, comments, and suggestions may be submitted verbally or in writing to a worksite supervisor or to any members of the Return to Work committee. The committee will review and make recommendations where needed. The CEO will review the recommendations and make a final determination.

If you see a clear violation of the plan, you should immediately notify any worksite supervisor or the CEO.

Disagreement with the plan does not constitute grounds to disregard any element of the plan. Employees or persons served who disagree with the plan are encouraged to follow the established problem-solving procedure.

## **ATTACHMENT A: SERVICE OPTIONS IN PHASE ONE**

***Initial Return:*** No individual is required to return to services at MMI. It is your choice when or if you are ready to return.

**Community Employment:** Community employment services will resume as recalled by community employers. For the initial return, transportation services will be limited and are described below.

**Community Living Supports:** 1:1 services will resume as requested, with individual plans about services and activities to be provided. Guidelines in the plan will be followed as described for screening, cleaning, transportations, and other areas. The only exception to the plan is that persons served are not required to wear masks in their own homes. Staff must continue to wear a mask.

### **Community Connections and Employment Connections**

- No transportation services will be provided by MMI except for community employment sites when work is after hours or when transportation is required between locations. Your job coach will clarify whether transportation is needed for your crew.
- No bus aides are available for public transportation
- Homes and/or families are expected to coordinate pick up and drop off at the location where services are being provided.
- Services will be provided in blocks as follows: 9:00 am – 11:30 am; noon – 2:30 pm; 3:00 pm – 5:30 pm. A person can participate in one block a day, for as many days as scheduling permits. The number of blocks and the number of days can increase as locations, capacity, and guidance changes.
- Groups will be designated based on consideration of living arrangements (people in the same home remaining together to minimize outside exposure), the community in which they live (to reduce transportation burdens), skill level, and service needs.
- Once groups are designated, they will remain together to the greatest extent possible. This will minimize the number of different people individuals are exposed to and therefore limits their risk. Individuals who reside together will remain together as a group whenever practical.
- MMI will assign a primary and a back-up staff member to assure proper training and to minimize exposure to a number of different people.
- Locations in the community are preferred. MMI buildings will only be used when no alternative is available.
- All staff and persons served must wear facemasks unless services are provided outdoors and the individual is able to maintain appropriate social distance from others. For individuals who are not yet able to do this, MMI can provide coaching and encouragement at their home to help them feel comfortable. MMI will provide

disposable face coverings. Reusable cloth masks can be worn if the individual provides their own.

- Emergency transportation must be available and able to pick up within 45 minutes. If this is not available, please cancel services for the day.
- Persons receiving services should eat before or after their service block. Lunch will not be served/supported (except as required for community employment) during the initial return to work.
- In addition to daily health screening for staff, health screening for each person served will be required at the start of each service block. This will require the person, home provider, or family member to complete a screening form. This can be completed at home and dropped off at the start of the assignment. MMI does not have the capacity to provide touchless temperature checks in every community-based setting so temperature checks need to be completed before leaving home.
- Medication will not be administered by MMI staff until further notice.

As restrictions are lifted, as more community sites become available, and as the CDC, OSHA, and other regulatory agencies change their guidance, these service requirements will be evaluated and revised.

MMI recognizes that we have people who are anxious to return to our services and we have people who are afraid to return. These guidelines are meant to create a path for people who wish to return to do so in a way that keep both the individual and our MMI staff safe.

If these guidelines do not work for you, please reach out with suggestions or ideas. We will consider them and assess whether we can accommodate those requests.

## **ATTACHMENT B**

### **COVID-19 Training Outline**

#### **What is COVID-19?**

The novel coronavirus, COVID-19 is one of seven types of known human coronaviruses. COVID-19, like the MERS and SARS coronaviruses, likely evolved from a virus previously found in animals. The remaining known coronaviruses cause a significant percentage of colds in adults and children, and these are not a serious threat for otherwise healthy adults.

Patients with confirmed COVID-19 infection have reportedly had mild to severe respiratory illness with symptoms such as fever, cough, and shortness of breath.

According to the U.S. Department of Health and Human Services/Centers for Disease Control and Prevention (“CDC”), Chinese authorities identified an outbreak caused by a novel—or new—coronavirus. The virus can cause mild to severe respiratory illness. The outbreak began in Wuhan, Hubei Province, China, and has spread to a growing number of other countries—including the United States.

#### **How is COVID-19 Spread?**

COVID-19, like other viruses, can spread between people. Infected people can spread COVID-19 through their respiratory secretions, especially when they cough or sneeze. According to the CDC, spread from person-to-person is most likely among close contacts (about 6 feet). Person-to-person spread is thought to occur mainly *via* respiratory droplets produced when an infected person coughs or sneezes, like how influenza and other respiratory pathogens spread. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs. It is currently unclear if a person can get COVID-19 by touching a surface or object that has the virus on it and then touching their own mouth, nose, or possibly their eyes.

In assessing potential hazards, employers should consider whether their workers may encounter someone infected with COVID-19 in the course of their duties. Employers should also determine if workers could be exposed to environments (e.g., worksites) or materials (e.g., laboratory samples, waste) contaminated with the virus.

Depending on the work setting, employers may also rely on identification of sick individuals who have signs, symptoms, and/or a history of travel to COVID-19-affected areas that indicate potential infection with the virus, in order to help identify exposure risks for workers and implement appropriate control measures.

There is much more to learn about the transmissibility, severity, and other features associated with COVID-19, and investigations are ongoing.

## COVID-19 Prevention and Work Practice Controls:

### Responsibilities of Employees and Persons Served

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol. Always wash hands that are visibly soiled.
- Cover your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Avoid close contact with people who are sick.
- If you have symptoms of COVID-19 (i.e., fever, cough, or shortness of breath) notify your supervisor and stay home—DO NOT GO TO WORK OR PARTICIPATE IN SERVICES.
- Sick individuals should follow CDC-recommended steps. Do not return to work or services until the criteria to discontinue home isolation are met, in consultation with healthcare providers and state and local health departments.

### General Job Site / Office Practices

- Clean AND disinfect frequently touched objects and surfaces such as workstations, keyboards, telephones, handrails, and doorknobs. Dirty surfaces can be cleaned with soap and water prior to disinfection. To disinfect, use products that meet EPA's criteria for use against COVID-19 and are appropriate for the surface.
- Avoid using items used by others including phones, desks, offices, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.
- Clean and disinfect frequently used tools and equipment on a regular basis.
  - This includes other elements of the jobsite where possible.
  - Employees should regularly do the same in their assigned work areas.
- Clean shared spaces such as conference rooms and break/lunchrooms at least once per day.
- Disinfect shared surfaces (door handles, machinery controls, etc.) on a regular basis.
- Avoid sharing tools (mops, vacuums, pencils, paperwork, backpacks, etc.) with co-workers if it can be avoided. If not, disinfect before and after each use.
- Any trash collected from the worksites must be changed by someone wearing gloves.
- In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), MMI will also provide:
  - Gloves: Gloves are to be worn when providing direct physical assistance to persons served. Staff should wash or sanitize hands immediately after removing gloves.
  - Masks: Masks are expected to be worn at all times by both employees and persons served. A clean mask must be used when the assignment changes. Masks should be removed by the ties or elastic – do not touch the front to the mask. Masks should be immediately placed into an MMI-provided paper or plastic bag until they can be washed or disposed of properly. Individuals should wash or sanitize hands before putting on a mask and immediately after removing and storing a mask.

**ATTACHMENT C**  
**Employee Notification**

DATE: [DATE]

TO: [CLOSE CONTACT EMPLOYEE]

FROM: [COMPANY REP]

We have been informed by one of our [employees/customer/vendor/etc] working at [SITE] that he/she has a confirmed case of COVID-19, commonly known as "Coronavirus," based on test results obtained on [DATE]. Per company policy, this [employee/customer/vendor/etc] has been directed to self-quarantine until permitted to return to work.

We are alerting you to this development because, based on MMI's investigation, we believe that you may have come into contact with the confirmed-positive case, on or about [DATE]. Based on Company policy we are directing you not to report to work (i.e., self-quarantine) until, at least, [14 days from last contact with confirmed case]. In the interim, we encourage you to seek medical advice and a COVID-19 test, especially if you are exhibiting symptoms of the virus.

If you do not test positive for COVID-19, or experience symptoms, by [14 days from last contact with confirmed case], you may return to work. However, please inform [COMPANY CONTACT] if any of the following occur during your self-quarantine: you experience flu-like symptoms, including fever, cough, sneezing, or sore throat; or you test positive for COVID-19.

We are committed to providing a safe environment for all of our employees and top-quality service to our customers. It is in the interest of those goals that we provide this information out of an abundance of caution.

We also want to take this opportunity to remind you that one of our core values as a company is respect for and among our employees [or customers]. We will treat information regarding the identity of employees [or customers] with suspected or confirmed cases of COVID-19 as confidential to the extent practicable and will comply with applicable laws regarding the handling of such information. Further, per Company policy, we will not tolerate harassment of, or discrimination or retaliation against, employees [or anyone].

Please contact [COMPANY CONTACT AWARE OF APPROPRIATE PROTOCOLS] at [PHONE NUMBER] if you have any questions or concerns.

For more information about COVID-19, please visit the CDC website at: <http://www.cdc.gov/coronavirus/2019-ncov/index.html>

**ATTACHMENT D**  
**Essential Industry Employee**

To whom it may concern:

Please be informed that the bearer of this letter is employed at MMI, a non-profit agency serving people with disabilities. We have reviewed all applicable orders and have determined that our operations qualify as essential/critical infrastructure and that we are able to continue to operate under those orders.

Employees in possession of this letter have been deemed essential to the minimum basic operations of our business. All non-essential personnel have been notified to work remotely to the greatest extent possible. Employees who are critical to the minimum basic operations of the business have been instructed to comply with social distancing rules/requirements in the jurisdiction, as well as other safety and health precautions.

If you have questions regarding the nature or scope of this letter, please do not hesitate to contact Cherie Johnson at 989-773-6918.

Sincerely,

Cherie A. Johnson  
CEO



**ATTACHMENT E**  
**MMI Janitorial Crew Procedures:**

Restroom Cleaning:

1. Using checklist, assemble all necessary equipment and chemicals onto cart. Place Wet Floor Signs at Restroom door.
2. Using appropriate PPE, flush toilets and urinals. Remove urinal screens, toilet clips & blocks.
3. Using your disinfectant cleaner, spray solution into each fixture. Spray on walls, partitions and around urinals. Allow to remain wet while proceeding through other steps.
4. Using your disinfectant cleaner, spray tops and bottoms of toilet seats. Remember to allow proper dwell time in steps 3-6 as per your disinfectant label instructions
5. Mist disinfectant cleaner on shelves, paper towel dispensers, trash cans, partitions, and behind basins.
6. Spray sink counters, basins and faucet handles with disinfectant cleaner and allow proper dwell time.
7. Refill all towel, sanitary napkin, tissue, and soap dispensers with your products.
8. Sweep and pick up paper and trash from floor with broom and dustpan. Spot clean and scrape up heavy soils or sticky substances.
9. Empty all waste receptacles and replace with appropriately sized plastic can liners where necessary.
10. Use swab mop to clean interior of toilets and urinals. Use paper towel to clean exterior of toilets and urinals. Use microfiber cloths to wipe down all other disinfected surfaces (see steps 3-6). Start with touch points and use new surface of cloth or new cloth as you proceed through the room.
11. Spray all mirrors with Glass & Window Cleaner and wipe with a microfiber cloth. If cloth is folded in fourths, you'll have eight clean surfaces to work with.
12. Replace urinal screens and blocks. Mop the floor with a neutral cleaner. Work backward towards the door. When the floor is dry remove wet floor signs.
13. When completed with your work, always clean and disinfect all equipment and store neatly for next use.

Periodic Restroom tasks:

1. If more aggressive cleaning is needed on fixtures, use an Acid Bowl Cleaner and bowl mop, clean interior of toilets and urinals and flush.
2. For a deeper basin clean, use Creme Cleanser RTU, scrub basins with a scrubbing pad. Rinse and polish dry with a clean towel.
3. Use a Stainless Steel Cleaner to clean and polish all metal fixtures.

#### Breakroom/Cafeteria Cleaning:

1. Apply PPE and place wet floor sign in doorway to limit access.
2. Gather any needed cleaning and restocking supplies and equipment.
3. Pick up and dispose of debris/trash on counters, floor and tables.
4. High dust as needed (vents, doors, corners, cupboards, refrigerator, lights, etc.)
5. Using all-purpose cleaner, damp wipe breakroom surfaces (see list in 6). Spot clean visible soils from building surfaces (7).
6. Sanitize or disinfect breakroom FTOs\*: coffee pots, condiments, receptacle lids, tables, chairs, counters, dispensers, appliance buttons/handles.
7. Sanitize or disinfect building surface FTOs\*: all door handles/touchplates, sinks, cupboard handles, & light switches. Also, any vending.
8. Refill soap, sanitizer and paper products. Check to ensure that dispensers are working properly.
9. Remove chairs and receptacles for floor care. Sweep floor and pick up debris. Spot clean heavy soils or sticky substances.
10. Empty trash and reline. Empty recycling receptacles in proper location.
11. Damp mop floor with all-purpose cleaner. Remove wet floor signs when floor is dry.
12. Return any chairs or receptacles you moved for floor care back to their original positions.

#### Disinfecting Office Space FTO's (Frequently Touched Objects):

1. Door Handles & Push plates Lobby & Breakroom Counters Desk Phones & Mobile Phones
2. Tablets, Keyboards, Mouse & Misc. Writing/Office Tools
3. Cubicles, Desks & Conference Area Tables
4. Stair Handrails
5. Handrails on Escalators Elevator Buttons, Inside and Out. Any Touch Light Switches Too.
6. Drinking Fountains
7. Vending Machines Breakroom: Coffee Pots, Condiments, Counters, Tables, Chairs, Cupboard, Refrigerator & Microwave Handles
8. Restroom: Entry Doors, Partition Doors, Faucets, Dispensers, Toilets, Urinals & Flush Handles

\*In times of high viral activity, disinfect several times per shift. Associates should have an ample supply of an EPA registered disinfectant. If using a spray vs. wipes, paper towels or fresh cloths and a laundry protocol.

1. Read the product label. Follow instructions specifically for the targeted result and pathogen.
2. Surfaces should be clean and free of all visible soil prior to sanitizing or disinfecting.
3. Be sure surface remains visibly wet for stated dwell time for either sanitizing or disinfecting.

ATTACHMENT F  
CLEANING PRODUCTS AND THEIR USE

Name of Cleaning product	Purpose/description	Use
<u>Primary Chemicals:</u>		
Halt	Halt is a hospital grade, one-step cleaner, bacteriacidal, virucidal, mildewcidal, fungicidal, disinfectant proven effective against norovirus, canine parvovirus and blood borne pathogens. At 1:64 dilution, Halt economically disinfects and deodorizes. With a fantastic, fresh scent, Halt leaves surfaces clean, germ-free, and safe!	our primary germ killer for touch points, restrooms, common area, and office cleaning and disinfecting
NABC	NABC Concentrate is a broad range germicidal cleaner-disinfectant concentrate specifically designed to clean and disinfect toilet bowls, urinals and other hard, nonporous restroom surfaces. NABC concentrate's pleasant and unique light floral fragrance incorporates an odor-killing component to deodorize toilet bowls, urinals and surrounding areas.	Halt back up product
Sani-T-10	Sani-T-10 is a disinfectant, sanitizer, algacide, and deodorizer used for anything from disinfecting hospital rooms and rinsing bar glasses, to keeping algae growth from occurring in pools. Sani-T-10 does not contain cleaning agents, perfumes, or any other additives that can be a problem in food-contact areas.	Halt back up product
BioRenewables Glass Cleaner	BioRenewables Glass Cleaner is a concentrated, bio-based product designed to clean mirrors, glass, and Plexiglas® surfaces as well as remove tough soils such as: grease, smoke, oils, and dirt. The simple spray on and wipe off formula can be used to clean and polish any hard surface not harmed by water such as: windows, mirrors, countertops, chrome, automobile glass, and any other glass or mirror finish.	our primary cleaner for glass, mirrors, and Plexiglas

Damp Mop	No-rinse floor cleaner concentrate reduces time and labor cost of daily maintenance of high gloss, metal-interlock floor finishes. Quickly and effortlessly removes dirt and other surface soils in heavily trafficked areas. Quick drying, Damp Mop leaves no residue or haze to dull floor finish. With a pleasant lemon fragrance, Damp Mop is also biodegradable and phosphate-free.	our primary mopping and general purpose neutral cleaner
<u>Secondary Chemicals:</u>		
Acid Bathroom Cleaner	A light to medium duty cleaner/maintainer formulated for use on restroom and shower room surfaces, toilet bowls and urinals. This non-fuming, surface friendly acid, when used as directed, will not cause severe corrosivity to most metal surfaces. Acid Bathroom & Shower Cleaner has a citrusy, clean, fresh deodorizing fragrance with no offensive acid bite.	used to clean toilet and urinal build-up/stubborn areas
The Degreaser	An ecologically sound, environmentally conscious, heavy-duty all-purpose industrial cleaner formulated to remove grease, oil and other tough soils without upsetting the ecosystem of water and waste treatment facilities. THE Degreaser is a powerful detergent complex with aggressive grease emulsification ability that quickly penetrates, emulsifies and removes tough industrial soils such as soot, oils and lubricants.	used to clean adhesives, other sticky areas, and build-up/stubborn areas
Airlift Tropical	Tropical blend of fruits and flowers, laced with refreshing hints of citrus, Airlift Tropical is a water-soluble air freshener formulated to eliminate unpleasant odors. While regularly scheduled cleaning and disinfecting procedures eliminate the soils and bacteria which cause most odors; people, pets, food, and accidents cause malodors which permeate surfaces, making the air unpleasant.	air freshener for use as needed
SparCreme	SparCreme liquid creme cleanser is a mild abrasive formulation designed to remove soap scum, stains and soil without dulling or scratching. soap film, stains, grease, rubber marks and other soil build-ups. SparCreme helps maintains the satiny smooth surface of brushed stainless steel and restores high gloss surfaces such as porcelain, ceramic tile, chrome and fiberglass.	used for build-up in sinks, and other porcelain surfaces

CitroShield	A unique, water emulsion formula, Citro Shield contains silicones and other restorative agents for quick shine-ups. Citro Shield cleans and polishes all types of wood, wood paneling, marble Formica, stainless steel, vinyl upholstery and appliances. Contains lemon oil.	wood furniture polish
Super Shine Stainless Steel Cleaner	Cleans, polishes and protects stainless steel without hard rubbing and polishing. Resists finger prints, grease and water spatter. Helps preserve the factory finish. Contains no acid or abrasive substances. Will not leave a powdery residue.	used for drinking fountains, sinks, and other stainless surfaces
Germicidal Bowl Cleanse	Germicidal Bowl Cleanse disinfects against many dangerous bacteria found in toilet bowls and urinals and removes tough stains, rust and scale. Formulated with metal corrosion inhibitors, Germicidal Bowl Cleanse protects plumbing and is safe for use on all vitreous china surfaces.	used for extreme iron and other build-up on porcelain surfaces
Consume Eco-lyzer	Consume Eco-Lyzer is a revolutionary quaternary-based disinfectant concentrate formulated to destroy pathogenic and odor causing bacteria and viruses, remove soils and leave natural digesters behind for residual control of nuisance odors. All in one, Eco-Lyzer features patented cleaning technology that reduces janitorial labor by cleaning, disinfecting, and digesting residual organic soils with one product.	used to clean the men's restroom floor (urine)
Foamy Q&A	Foamy Q & A is a ready-to-use, acid-based disinfectant with special foaming action for fast and efficient maintenance of shower rooms, restrooms, locker rooms and other areas. Suitable for the Bloodborne Pathogen Standard, Foamy Q & A is a hospital grade, one step cleaner and disinfectant. Simply foam on, agitate and rinse away.	used in restrooms for build up; clings to walls well to allow more dwell time
SC-200	SC-200 is a high alkaline, solvent-based, extra heavy-duty industrial cleaner. Formulated for use at low to medium range dilutions, SC-200 attacks grease and encrusted soil on concrete, road equipment, and heavy machinery. Safe to use in automatic scrubbers, SC-200 efficiently cleans manufacturing facility floors.	used on heavy floor build-up areas and other special cleaning

**MMI Return to Work Plan  
Attachment G  
Job Placement Services**

This document is an attachment to MMI's Return to Work Plan and was created to detail the initial return to guidelines for MMI's Job Placement Program.

At all times MMI employees and job placement participants need to utilize required PPE for per CDC/governmental guidelines to ensure everyone's safety. The Employment Specialist will review the activities that will be performed and adjust them as necessary to have as minimal in-person contact with others. When in-person activities must occur, the Employment Specialists and job placement participants will follow all MMI requirements such as the completion of a screening sheet, social distancing and disinfecting meeting areas both prior and post meeting. In-person meetings will be confined to minimal spaces to decrease touch points while keeping social distance. Prior to each in-person meeting the Employment Specialist will review the protocols with the participant. Initially, this will also include a training segment on how to prevent the spread of Covid-19, why the precautions are necessary and when it's appropriate to cancel a meeting – i.e. showing symptoms.

Following is a list of how each service the Employment Specialist provides will be handled during the initial return to work plan.

**Intakes**

Initially intakes will continue to be virtual when possible, either through Zoom, Messenger or by phone. The participant may come in to MMI to sign the intake documents and obtain their copies. It is the intent to eventually hold in-person intake meetings at some point, while still holding to required guidelines. It is more conducive to get to know your new participant in-person than over the phone.

**On the Job Evaluations / Job Shadows**

OJE's and Job Shadows are done in person at host sites with no time required to be at MMI for these services, however, the Employment Specialists/Job Coach may need to meet at the host site as required. When setting these services up, the Employment Specialist will review the detailed task list with the host site and determine the best way to make the experience as contactless as possible while still meeting the participant's need. Things to be considered are, adjusting shift times if possible, to less busy hours and locations where certain tasks occur, possibly rearranging a workspace to keep contact to a minimum.

**Career Exploration/Assessment**

The actual assessments used through CareerScope can be done virtually on-line via Zoom. However, based on the individual's needs, there may be times this must be done in person. There is also a community-based component to this service where the Employment Specialist and participant are to visit or complete an informational interview at 1 to 3 sites of interest.

When possible, the informational interview will be done via Zoom/phone. When in-person attendance is required, all safety guidelines and protocols will be observed.

### **TAP Service**

There are 12 segments to this service. The bulk of them can be completed remotely with most clients over Zoom/Messenger. This service would be difficult to complete via phone. There are some segments that would be beneficial to complete in person, such as mock interviewing and review of mock interview. The intent would be to eventually be able to do this service in person following all guidelines.

### **Placement Services**

Initially, this service will need to be completed virtually via Zoom meetings or phone. There will be times that the Employment Specialist will need to meet with the employer or assist an individual with such things as interviewing or orientation. Staff and participants will follow at minimum the CDC guidelines as well as any other additional safety protocols that the employer may have. The Employment Specialist should inquire about their guidelines, prior to entering a place of business.

### **Job Coaching**

Job Coaching is typically an on-site in-person service. However, there may be opportunities to coach an individual virtually or by phone. Initially, this is the preferred method. When on-site coaching is required, the Employment Specialist will contact the employer to find out their safety protocols and notify the coach of the requirements.

### **Retention**

Retention contact is typically completed once per week with an employer and employee, to check on the status of the employment relationship. Initially, this service can be completed via phone whenever possible.

### **Tours**

Whenever possible the Employment Specialist should do a virtual tour and gather information to play back for participant and be able to answer their questions.

### **Starting the Return**

Employment Specialists should be doing the following:

- Contacting participants to keep engaged and ensure they are doing ok
- Reaching out to existing employer contacts and seeing how they are doing
- Reach out to placement employers and see what their plan is for return to work for people who were placed prior to Covid-19
- Develop a written plan for each person on caseload which details how authorized services will be provided to that person and projected contacts on their behalf

## **MMI Return to Work Plan Attachment Initial Return to Work Guidelines for PCA Site**

This document is an attachment to MMI's Return to Work Plan. It describes the requirements and expectations of staff and persons served who are initially returning to work at PCA.

At all times, MMI employees and persons served must utilize required PPE (Personal Protective Equipment) per CDC/governmental guidelines to ensure safety for everyone. Current safety procedures at PCA require temperature checks, a screening tool, face coverings, and social distancing. We will begin work at PCA with one six-hour shift working Monday through Friday.

### **PCA Protective Measures**

- a) **Temperature checks**- All staff and persons served are required to have their temperature checked prior to starting work at PCA. The thermometer or temperature scanner will be provided by MMI for use by the Employment Coach only. The Employment Coaches will take their own temperature initially. If clear, the Employment Coach will continue by checking the temperature of persons served that they will be coaching for that shift. The temperature scanner is sole responsibility of the Employment Coach and must only be used by the Employment Coach. It must be locked up in the designated area after each use. If the scanner comes up missing, the Employment Coach on duty at the time of loss will be responsible.
- b) **Screening Tool** - All staff and persons served must complete the appropriate screening tool provided by the local Community Mental Health Agency or by MMI upon entry to PCA, agency vehicles and buildings, and/or upon pickup if providing transportation to persons served. Any employee or person served showing symptoms of COVID-19 will be asked to leave and return home if they fail the screening. Any areas the person may have contacted prior to discovery will be thoroughly cleaned and disinfected after departure.
- c) **Face Coverings**- Employees and persons served must wear face coverings at PCA. Disposable face coverings will be provided by MMI. Employment Coaches are responsible for making sure their face covering is ready and worn first. Then, one-by-one, the Employment Coach will assist each person served on preparing and fastening the face covering for each person served who do not have their own personal mask or covering. If a person served chooses to wear their own reusable mask, Employment Coaches are encouraged to promote proper hygiene and care with the person served to help ensure the mask they are wearing is clean and safe. Employees are encouraged to minimize ridesharing and to only transport persons served when no alternative is available. While in the vehicle, everyone must wear a mask, maintain appropriate distancing, and ensure adequate ventilation. Air flow settings should draw in outside air and not re-



circulate interior air. Windows should be opened a small amount if weather permits. If practicable, employees should use/drive the same vehicle every shift.

- d) **Social Distancing** – Social Distancing is a requirement at PCA as it is for all MMI staff and Persons Served. This means to keep 6 feet distance at all times. The lines at PCA have been reconfigured to meet this requirement.
- e) **Arrival/Departure** – When arriving to PCA, the Employment Coach is required to check their temperature, fill out a screening tool, and sanitize as listed below in section (i). As persons served arrive to PCA, the Employment Coach will do temperature checks, help them fill out a screening tool, and help them by making a mask and making sure it fits properly as listed in section (c). At departure, Employment Coaches will be responsible for making sure sanitation/disinfection is completed for all areas/tools of use.
- f) **Break Schedule** - Schedules will be established to stagger break times, if practicable, to reduce the size of any group at any one time to less than three (3) people in the break room. Break groups will be staggered to be 10 minute breaks every two hours. For example, the first group will take their break from 9:50am to 10:00am and the second group will take their break from 10:00am to 10:10am. Designated areas outside or in personal vehicles may be used for breaks to promote social distancing.
- g) **Gloves** – Gloves are not required to be worn at PCA to complete contract work. However, staff will have access to gloves for personal care situations.
- h) **Tools and Equipment** – At PCA, tools are shared between shifts. When possible limit the use of shared tools and equipment. If tools must be shared, MMI will provide appropriate cleaners or sanitizing wipes to clean tools before and after use.
- i) **Sanitization and Disinfecting** - At PCA, staff must sanitize the workspaces used in the location upon arrival, throughout the workday, and immediately before departure. This includes all surfaces that coaches and persons served will be in contact with, such as door handles/knobs, tools, chairs, tables, cabinets, etc. MMI will provide appropriate cleaning products for this purpose. Staff and persons served should also wash or sanitize hands immediately upon arrival and again before departure. Any trash collected must be changed by someone wearing nitrile, latex, or vinyl gloves.

### **Return to Work Tasks:**

- Implement a plan for individuals who have transportation to cover the initial return to work plan. These individuals will have first opportunity to return to work.
- If shifts are not covered by people who can self-transport, analyze and configure shifts by geographical location. MMI transportation will be limited and follow CDC/MMI guidelines.
- Gather the required PPE's and get to staff
- Train coaches and persons served on these guidelines before starting initial work at PCA.

## COVID-19 Testing Procedure

As an employer who works with people who are medically fragile and/or vulnerable to the effects of COVID-19, MMI is cautious about assuring the people we serve and our staff are safe. For that reason, there may be times when MMI will require or request that staff be tested for COVID-19. As the services provided by MMI have been deemed essential, these tests will be provided at no cost to the employee. In some circumstances, if not covered by the State or Federal government, MMI will pay for the cost of a required test. The employee is responsible for scheduling an appointment (if required) for a certified test at the facility of their choice. Depending on the circumstances, a referral from a primary care physician may be required. If you do not have a primary care physician, many testing facilities can refer you to one.

	A test will be required	Employee may not return to work until negative test is received	Employee may return to work while self monitoring for symptoms	A test will be requested but not required
The employee is experiencing symptoms of COVID-19	<b>X</b>	<b>X</b>		
The employee has been in direct contact in the last 14 days with someone who has tested positive for COVID-19	<b>X</b>	<b>X</b>		
A funding source, person served or guardian of a person served has requested a test, and the request is deemed reasonable based on the vulnerability of the person served and the type of service provided	<b>X</b>	<b>X</b>		
The employee has traveled internationally in the last 14 days	<b>X</b>		<b>X</b>	
The employee has traveled in or out-of-state in the last 14 days using mass transit (plane, train or bus)	<b>X</b>		<b>X</b>	
The employee has engaged in high risk behavior including, but not limited to: participating in an event of a size that exceeds the limits in the current Executive Orders issued by Governor Whitmer, spending time with others outside your immediate living/social group where social distancing or mask use was not enforced, attending a camp or other activity that involved a congregate stay with others, etc.	<b>X</b>		<b>X</b>	