



CORONAVIRUS RESPONSE PLAN

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I. Coronavirus Task Force

- a. Establish a task force of key decision-makers to address safety, operations, human resources, and IT issues
- b. Identify individuals responsible for monitoring developments and informing the task force of any revisions for federal and state compliance
- c. Identify points of contacts for local and state health departments and emergency preparedness organizations
- d. Identify clinics and hospitals in the area and their points of contact
- e. Create a list of mental health and faith-based resources that are available to provide counseling, if needed
- f. Identify and evaluate COVID-19 hazards
- g. Review existing safety plans to ensure compliance with Cal/OSHA Emergency Temporary Standard

II. Goals & Expectations of the Coronavirus Response Plan

- a. Define channels of employee communication
- b. Plan and conduct appropriate employee training, including use of protective equipment, hygiene practices, or remote access policies
- c. Outline criteria of progression for escalating phases of Coronavirus Response Plan
- d. Define roles of key decision-makers

III. Coronavirus Response Plan Framework

a. **Phase 1** – Mitigation & Assessment (No Imminent Threat)

HYGIENE CONTROL

1. Implement respiratory hygiene/cough etiquette
2. Provide face coverings and ensure they are worn by employees over the nose and mouth at all times when around others
3. Consider providing other equipment (e.g. gloves, goggles, thermometer temperature guns) for employees to self-monitor
4. Establish handwashing protocols
5. Intensify sanitation of worksite and common areas
6. Begin logistics and budget planning for extended use of hygiene materials (e.g. masks, gloves, sanitizer, etc)
7. Implement 6-feet physical distancing, but if not possible, install “cleanable solid partitions”

COMMUNICATION CHANNELS

1. Identify person(s) responsible for receiving informational updates
2. Identify the person(s) responsible for communicating with state and local officials
3. Identify the person(s) responsible for communicating updates from company or state and local officials to workforce
4. Identify methods of communicating with the workforce, family members, and any visitors about the status of operations
5. Identify union representative point of contact and potential collective bargaining issues, if applicable
6. Identify key vendor points of contacts

MANDATORY INFORMATIONAL REPORTING

1. Encourage reporting of observable symptoms
2. Create a protocol for identification of observable symptoms and separation of employees to designated area
3. Ensure proper personal protective equipment is available and employees are trained on such use, if applicable

MANDATORY QUARANTINE

1. Mandate employees to stay home for 14 days if feeling unwell or have been in contact with an infected person
2. Define types of sickness covered under company policy, including respiratory illness or other COVID-19 symptoms
3. Evaluate and consider payment for sick leave and self-quarantines
4. Ensure that COVID-19 cases are excluded from the workplace until the return-to-work criteria are met

GENERAL TESTING REQUIREMENTS

1. If one case in the workplace: Must offer free COVID-19 testing during working hours to all employees who have potential COVID-19 exposure in the workplace
2. Shall inform impacted employees of the reason for the COVID-19 testing and possible consequences of a positive test
3. May not use COVID-19 testing as an alternative to face coverings when face coverings are required

b. **Phase 2** – Counteractive Measures (Community Outbreak)

SICK LEAVE AND PAID LEAVE POLICIES

1. Evaluate and consider updates to any applicable leave policies
2. Create a protocol for handling personnel demonstrating symptoms
3. Establish a procedure for personnel returning to work after sickness or diagnosis with COVID-19
4. Consider waiving requirements under sick leave policy and/or other abuse provisions in paid leave policies to allow liberal use
5. Identify disabled or at-risk employees and potential accommodations available
6. Comply with Cal/OSHA ETS for provision of pay and benefits

FLEXIBLE SCHEDULING

1. Implement work from home arrangements
2. Consider modifying employee shifts to minimize overlap and avoid peak commute times on public transportation
3. Consider strategies to address childcare issues based on local school district response plans

CONTINGENCY STAFFING PLAN

1. Identify minimum staffing needs and prioritize critical vs. non-essential services
2. Designate a person(s) responsible for daily staffing assessment and for communicating this assessment with the task force
3. Arrange contingency plans for payroll and other critical services if key personnel or vendors are unavailable

SUPPLY CHAIN SHORTAGES

1. Identify areas of weakness in the supply chain
2. Secure alternative channels for necessary resources to sustain operations
3. Identify effects of supply chain issues on staffing and consider layoffs or reduction in hours

TESTING REQUIREMENTS

1. Multiple COVID-19 Outbreaks: Provide COVID-19 testing to all employees at the exposed workplace during the period of the outbreak or the relevant 14-day period
2. Major COVID-19 Outbreaks: Provide testing for all employees present at the exposed workplace during the 30-day period
3. Must offer testing free of charge, during employee hours, and conduct testing as recommended by the local health department

COMPLIANCE

1. Comply with California Labor Code and Cal/OSHA ETS Notification requirements
2. Comply with Cal/OSHA Return to Work Criteria (SEE FAQ)

c. **Phase 3** – Emergency Measures (Quarantine/Temporary Shutdowns)

SHUTDOWN PLANS

1. Create plan for shutdown of affected areas and potential safety issues
2. Identify when additional environmental cleaning is necessary
3. Arrange backup work locations for critical personnel

EMERGENCY PAYROLL POLICIES

1. Ensure continuity and compliance with state wage payment laws
2. Consider temporary pay cuts for areas affected by shutdowns or quarantines
3. Consider furloughs in areas with diminished demand for services
4. Give advanced notice to impacted employees/facilities
5. Identify emergency communication methods
6. Ensure compliance with state/federal laws and union contracts
7. Comply with Cal/OSHA ETS for provision of pay and benefits

REOPENING PLANS

1. Identify criteria for return to work in affected areas, including mandatory temperature checks, physical examinations, or documentation

PROPERTY AND ASSET SECURITY DURING SHUTDOWNS

1. Limit IT access during shutdowns and security of networks
2. Ensure security of company assets
3. Address safety concerns regarding physical worksites that require monitoring, such as plants, chemical storage, etc. and necessary critical personnel

FAQ

For employees

1. How will my company be impacted by the coronavirus and what is the plan?

Your company should have developed contingency plans and will be communicating any changes in employment policies and safety procedures on an ongoing basis. Please read and follow these instructions and if you have questions please contact your immediate manager or Human Resources.

2. What are some special precautions I should be taking in terms of hygiene?

The CDC recommends the following hygiene protocol: Wash your hands frequently with soap and water for at least 20 seconds. If soap and water are not available, use an alcohol-based hand sanitizer. Avoid touching your eyes, nose, and mouth with unwashed hands as well as touching door handles and other points of frequent contact. Cough into your sleeve or sneeze with a tissue, then throw the tissue in the trash.

3. If I feel sick at work, what should I do?

Early symptoms of COVID-19 can look like a cold or the flu and can vary in intensity. If you are experiencing any of the following symptoms – fever, cough, shortness of breath – please notify management and leave the workplace immediately. Call your healthcare provider in advance so that they can take proper precautions or direct you to the appropriate location for care. Do not return to the workplace until you are symptom-free and cleared by your healthcare provider.

4. If I am unable to work (and telework) because of sickness, how will I be paid?

If you are out with COVID-19 or are caring for ill family members, check with the Department of Labor (DOL) for information on whether such leave is covered under the Family and Medical Leave Act (FMLA). Under the FMLA, covered employers must provide employees job-protected, unpaid leave for specified family and medical reasons - more on this in the next question.

5. If I am sick with COVID-19, or am caring for a family member who is sick with COVID-19, can I take FMLA leave?

If you are eligible for FMLA and are sick, or are caring for a family member who is sick, with COVID-19, you may be entitled to leave under the FMLA under certain circumstances. An FMLA-eligible employee can take up to 12 weeks of unpaid, job-protected leave in a designated 12-month leave year for specified family and medical reasons, including a serious health condition as defined by the FMLA.

Workers who are ill with COVID-19 or have a family member with COVID-19 are urged to stay home to minimize the spread of the pandemic. Employers are encouraged to support these and other community mitigation strategies and should consider flexible leave policies for their employees.

6. What happens if my child's school, place of care, or childcare provider is closed or unavailable due to COVID-19 related reasons and I cannot find childcare arrangements?

There is currently no federal law covering non-government employees who take off from work to care for healthy children, and employers are not required by federal law to provide leave to employees caring for a child whose school is closed or whose care provider is unavailable due to COVID-19 reasons.

However, please maintain any documentation about school closings or unavailability of childcare, such as notices from school, website postings, or newspaper articles, as the Company can request this documentation.

7. If I encounter someone in the workplace who is sick, what should I do?

If you believe that someone in the workplace is demonstrating symptoms of a respiratory illness, please notify your immediate supervisor or Human Resources professional as soon as possible. Please do not confront any individual about his/her medical condition. Any discrimination or harassment based on national origin, age, disability, or any other protected category is a serious matter and may result in disciplinary action.

For more information, [read here](#).

For employers

8. Am I required by law to provide paid sick leave to employees who are unable to work due to COVID-19?

Currently, federal law generally does not require employers to provide paid leave to employees who are absent from work because they are sick with COVID-19, have been exposed to someone with COVID-19, or are caring for someone with COVID-19. Under **Executive Order 13706**, some federal contractors may be required to provide such leave to employees under certain circumstances, such as if the employee or a family member is sick with COVID-19 or seeking care related to COVID-19. Certain state or local laws may have different requirements, which employers must also consider when determining their obligation to provide paid sick leave.

However, given the potential for significant illness under pandemic scenarios, employers should review their leave policies to consider providing increased flexibility to their employees and their families.

9. If I am a small business with fewer than 50 employees, am I exempt from the FMLA?

The U.S. Department of Labor has stated that small businesses may be exempt from FMLA if providing an employee such leave would jeopardize the continuing viability of the business. Small businesses may be exempt from the FMLA only if:

- They have less than 50 employees;
- Their employee(s) have worked for their employer for less than 12 months;
- Their employee(s) have less than 1,250 hours of service over the 12 month period before their leave begins

10. Can I require a negative COVID-19 test for my employee?

No, a negative COVID-19 test cannot be required for an employee to return to work.

11. What is CAL/OHSA's return to work criteria for COVID-19 cases?

For cases with symptoms, employees will not be allowed to return to work until: (1) at least 24 hours since fever of 100.4 or higher has resolved without the use of fever-reducing medications; (2) COVID-19 symptoms have improved; and (3) at least 10 days have passed since symptoms first appeared.

For cases without symptoms, employees will not be allowed to return to work until: a minimum of 10 days have passed since the date of specimen collection of their first positive COVID-19 test.

For more information, [head here](#).

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