

October 7, 2020

COVID-19 Preparedness & Response Plan

General

The following COVID-19 Preparedness and Response Plan (“Plan”) has been established for ManagedWay in accordance with the requirements in the Emergency Order Under MCL 333.2253 - Gathering Prohibition and Mask Order issued by the Michigan Department of Health and Human Services (“MDHHS”) on October 5, 2020, the OSHA Guidance on Preparing Workplaces for COVID-19, and the latest guidance from the US Centers for Disease Control and Prevention (“CDC”). The purpose of this plan is to minimize or eliminate employee exposure to SARS-CoV-2. SARS-CoV-2 is the virus that causes COVID-19. Throughout this document, the virus will be referred to as COVID-19.

The MDHHS’ requirements, OSHA guidance, and CDC guidance for COVID-19 have general safeguards applicable for all workplaces and specific safeguards for certain industries. Katrina Gomez (Human Resources / Office Manager) has read these guidance documents carefully, found the safeguards appropriate to ManagedWay based on its type of business or operation, and has incorporated those safeguards into this COVID-19 Preparedness and Response Plan.

As the COVID-19 situation evolves, the MDHHS, OSHA, and CDC guidance are periodically updated. Katrina Gomez will be responsible for visiting the aforementioned web pages regularly for the latest information and for revising the plan as necessary. This plan reflects the latest guidance as of October 7, 2020.

ManagedWay has designated multiple worksite supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The worksite supervisors are Katrina Gomez, Mikey Mettetal (Facilities Manager), and Steven Pytlowanyj (Operations Director).

This Plan has been made available to employees via the Company Links section in BambooHR. A hard copy of this Plan can be requested through Katrina Gomez (kgomez@managedway.com).

Exposure Determination

ManagedWay has evaluated routine and reasonably anticipated tasks and procedures for all employees to determine whether there is actual or reasonably anticipated employee exposure to COVID-19. Katrina Gomez was responsible for the exposure determination.

ManagedWay has determined that its' employees' jobs fall into only the lower exposure category as defined by the OSHA Guidance on Preparing Workplaces for COVID-19. Lower Exposure Risk Jobs are defined by OSHA as those that do not require contact with people known to be, or suspected of being, infected with COVID-19 nor frequent close contact with the general public (i.e., within 6 feet of). Workers in this category have minimal occupational contact with the public and other coworkers.

Katrina Gomez verifies that ManagedWay has no high-risk exposure jobs. High-risk exposure jobs have high potential for exposure to known and suspected cases of COVID-19. Examples are most jobs in healthcare, medical transport, nursing homes and residential care facilities, mortuaries, law enforcement, and correctional facilities.

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. Katrina Gomez is responsible for seeing that the correct administrative controls are chosen, implemented, and maintained for effectiveness.

The following administrative controls have been established for ManagedWay:

Job / Task	Administrative Control
All Employees	Required screening, including a temperature scan, administered at the Technical Support Services Desk prior to gaining entry to the facility. Review the COVID-19 Return to Work Guide and Decision Tree posting. This is for all employees, customers, contractors, suppliers, and guests.

Job / Task	Administrative Control
All Employees	Utilization of ground markings and signage to prompt all employees, customers, contractors, suppliers, and guests to practice social distancing and safety measures.
	Provide employees with non-medical grade face coverings, hand sanitizer, sanitizing wipes, and disposable gloves.
	Require employees, customers, contractors, suppliers, and guests to wear face coverings including during in-person meetings and in restrooms and hallways. If an individual cannot medically tolerate a face covering, we require verbal confirmation of this.
	Restrict business-related travel for employees to essential travel only.
	Increase the frequency of the changing of air filters and HVAC filters.
	Ensure that sick leave policies are flexible and consistent with public health guidance so that employees do not go to work sick. Also, employees' paid leave rights under the Families First Coronavirus Response Act are posted in BambooHR.
	Maintain flexible policies that permit employees to stay home to care for a sick family member. Also, employees' paid leave rights under the Families First Coronavirus Response Act are posted in BambooHR.
	Promote remote work to the fullest extent possible.
	Minimize the sharing of tools, equipment, and items.
	Encourage customers to place orders for services online. Utilization of our remote customer service / ticketing service.
	Require employees to disclose if they have tested positive or have been exposed to someone with a confirmed or suspected case of COVID-19. The name and other personal identifying information of the employee will not be disclosed to others. Disciplinary action will be taken against any employee who violates this process and discloses information regarding the identity of an employee confirmed or suspected to have COVID-19

Hand Hygiene

Katrina Gomez will be responsible for ensuring that adequate handwashing facilities are available in the workplace. Employees are also provided with antiseptic hand sanitizer upon entry to the facility and at their individual workstations. ManagedWay provides time for employees to wash their hands and to use hand sanitizer frequently.

Disinfection of Environmental Surfaces

ManagedWay has increased facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (for example, door handles). ManagedWay has provided cleaning supplies and hand sanitizer to each employee to keep at their individual workstations.

Mikey Mettetal will be responsible for seeing that environmental surfaces in the workplace are cleaned and disinfected. Frequency of such disinfection will be determined in part by factors such as when and how often the environmental surfaces are potentially exposed to COVID-19. When choosing cleaning chemicals, ManagedWay will consult information on Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens. Products with EPA-approved emerging viral pathogens claims are expected to be effective against COVID-19 based on data for harder to kill viruses. The manufacturer's instructions for use of all cleaning and disinfection products will be strictly adhered to.

ManagedWay will perform enhanced cleaning and disinfection after persons confirmed to have COVID-19 have been in various work areas. In the interim, those work areas will be temporarily closed, and employees will be sent home or relocated. Katrina Gomez will be responsible for seeing that this protocol is followed. An investigation and Contact Tracing will be performed to determine the persons who had close contact with the individual confirmed to have COVID-19. The name and other personal identifying information of the individual confirmed or suspected to have COVID-19 will not be disclosed to others.

Personal Protective Equipment (PPE)

Due to ManagedWay being a Lower Risk Exposure employer regarding COVID-19, there is no need for additional PPE beyond what is typically used for job tasks. However, ManagedWay does provide non-medical grade face coverings and gloves to all employees.

All employees, customers, contractors, suppliers, and guests are required to wear face coverings, including during in-person meetings and in restrooms and hallways. If an individual cannot medically tolerate a face covering, verbal confirmation of this is required.

Health Surveillance

ManagedWay has implemented a screening protocol to identify known or suspected cases of COVID-19 among employees and isolate them from the remainder of the workforce. Katrina Gomez (Human Resources / Office Manager) will be responsible for ensuring that all required health surveillance provisions are performed. The name and other personal identifying information of the individual confirmed or suspected to have COVID-19 will not be disclosed to others.

As employees enter the place of employment at the start of each work shift, ManagedWay will have employees screen for COVID-19 by answering a questionnaire covering the signs and symptoms and their exposure to people with a suspected or confirmed case of COVID-19. A no-touch thermometer will be used for temperature screening of employees entering the facility. This screening is administered by the Technical Support Services Desk. Signage is posted to prohibit anyone from entering the remainder of the facility if they have not completed their screening. ManagedWay will similarly screen customers, contractors, suppliers, and any other individuals entering the facility.

Employees have been directed to promptly report any signs and symptoms of COVID-19 to their direct supervisor before and during their work shift. ManagedWay has provided employees with instructions for how to make such a report to the employer. If an immediate response is not received from their supervisor, the employee should contact Katrina. The employee is not to report to any ManagedWay facility until speaking with their supervisor, HR, or leadership. Information regarding an employee's exposure to COVID-19 is highly confidential and is not to be disclosed to other staff members, except to the employee's supervisor, HR, and leadership. Disciplinary action will be taken against any employee who violates this process.

ManagedWay will physically isolate any employees with a known or suspected case of COVID-19 from the remainder of the workforce, using measures such as, but not limited to:

- Not allowing known or suspected cases to report to or remain at their work location.

- Sending known or suspected cases to a remote location (for example, home) where they are self-isolating during their illness.

ManagedWay strictly prohibits the discharge, discipline, or any other form of retaliation against employees who stay at home or who leave work when they are at particular risk of infecting others with COVID-19.

When an employee is identified with a confirmed case of COVID-19, Katrina Gomez (Human Resources / Office Manager) will notify the local public health department immediately. An investigation and Contact Tracing will be performed to determine the persons who had close contact with the individual confirmed to have COVID-19. All coworkers, customers, contractors, suppliers, and any other individuals who had close contact with the individual will be notified within 24 hours. The name and other personal identifying information of the individual confirmed to have COVID-19 will not be disclosed to others.

ManagedWay will allow employees with a confirmed or suspected case of COVID-19 to return to the workplace only after they are no longer infectious according to the latest guidelines from the CDC.

Training

ManagedWay shall coordinate COVID-19 training and ensure compliance with all training requirements.

ManagedWay will train employees on, at a minimum:

- Routes by which the virus causing COVID-19 is transmitted from person to person.
- Distance that the virus can travel in the air, as well as the time it remains viable in the air and on environmental surfaces.
- Symptoms of COVID-19.
- Workplace infection-control practices.
- The proper use of PPE, including the steps for putting it on and taking it off.
- Steps the employee must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
- How to report unsafe working conditions.

Katrina Gomez shall create a record of the training. The record will list the names of the employees trained, training date, name of the trainer(s), and content of the training.

Recordkeeping

ManagedWay will maintain the following records as they relate to the COVID-19 Preparedness and Response Plan:

Self-Screening Logs: A record will be maintained of daily entry self-screening results for all employees, customers, contractors, suppliers, and any other individuals entering the facility. This includes the individual's body temperature taken from a no-touch thermometer, the answers to a questionnaire regarding the signs and symptoms of COVID-19, and exposure to people with a suspected or confirmed case of COVID-19.

Confirmed Cases of COVID-19: When an employee is identified with a confirmed case of COVID-19, a record will be maintained of when the local public health department was notified, as well as any coworkers, customers, contractors, suppliers, and any other individuals who may have come into close contact with the person who has the confirmed case of COVID-19. The name and other personal identifying information of the individual confirmed to have COVID-19 will not be disclosed to others. Disciplinary action will be taken against any employee who violates this process.

Training Records: A record will be maintained of any staff training sessions regarding COVID-19. The record will list the names of the employees trained, training date, name of the trainer(s), and content of the training.

Katrina Gomez will ensure that all of these records are securely maintained in HR's office.

If you have any questions or concerns regarding this matter, please contact HR or myself.

Sincerely,

Bill Kish
COO
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