



## **Burnham & Flower Agency, Inc. COVID-19 Preparedness and Response Plan**

In accordance with Executive Order 2020-59 and MIOSHA Emergency Rules for Coronavirus Disease 2019 (COVID-19), Burnham & Flower Agency, Inc. ("Company") institutes this COVID-19 Preparedness and Response Plan ("Plan") in order to minimize or eliminate employee exposure to SARS-CoV-2.

Company aims to protect its workforce by enacting all appropriate prevention efforts. Company is continually monitoring guidance from local, state, and federal health officials and implementing workplace and Plan modifications where appropriate. The Emergency Rules have general safeguards applicable for all workplaces and specific safeguards for certain industries. We have read these emergency rules carefully, developed the safeguards appropriate to Burnham & Flower based on our type of business and operation, and we have incorporated those safeguards into this COVID-19 preparedness and response plan.

Amber Howes and Bobbi Pritchard have been designated as the worksites supervisors who will implement, monitor, and report on the COVID-19 control strategies developed in this plan. Bobbi will remain on-site at times employees are present.

The plan will be made readily available to our employees via the website and intranet and by hard copy when requested.

### **1. Exposure Determination**

The Company has evaluated routine and reasonably anticipated tasks and procedures for all employees to determine whether there is actual or reasonably anticipated employee exposure to SARS-CoV-2. Amber Howes was responsible for the exposure determination.

We have determined that our employees' jobs fall into only the lower exposure risk categories as defined by the OSHA Guidance on Preparing Workplaces for COVID-19:

**Lower Exposure Risk Jobs.** These jobs do not require contact with known or suspected cases of COVID-19 nor frequent close contact (for example, within six feet) with the general public. Workers in this category have minimal occupational contact with the public and other coworkers. Examples are small offices, small manufacturing plants (less than 10 employees), small construction operations (less than 10 employees), and low-volume retail establishments, provided employees have infrequent close contact with coworkers and the public.

With the possible exception of insurance producers/account managers, all Burnham & Flower positions do not have contact with the public. The producers/account managers may be asked to meet with a client in-person and may do so only if full protective measures including mask wearing and social distancing are taken into account. Virtual meetings are encouraged.

The vast majority of our positions are being conducted on a fully remote basis. For those that are required to come into the office, the duration of time spent in the office for most is short and infrequent.

Burnham & Flower has no high-risk exposure jobs. High exposure risk 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.

## **2. Administrative Controls**

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

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

Company abides by the recommended social distancing and other safety measures and establishes the following:

- Large gatherings are minimized whenever possible; staff meetings are held with social distancing standards in place, held remote (or combination of both) or cancelled.
- Employees are encouraged to maintain physical distance of six feet or more even when on break, as well as before and after working hours;
- Employees are required to maintain physical distance when reporting to work, clocking in, leaving work, and clocking out;
- Employees' work stations are no fewer than six feet apart unless a barrier is in place if under six feet
- Company may utilize flexible work hours, wherever possible, to limit the number of employees simultaneously working on-site;
- Employees' interactions with the general public are modified to allow for additional physical space between parties; and
- Non-essential travel is postponed or cancelled.
- Company provides employees with, at a minimum, non-medical grade face coverings.
- Masks are required in the office at all times and in all areas except when sitting at your desk.

In addition, Company is instituting the following cleanliness measures:

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

Employees are expected to minimize COVID-19 exposure by:

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

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

An employee with a COVID-19 diagnosis or who displays symptoms consistent with COVID-19 must be immediately removed from the worksite.

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

- Informs all employees with and near whom the diagnosed/symptomatic employee worked of a potential exposure;
- Keeps confidential the identity of the diagnosed/symptomatic employee; and
- Conducts deep cleaning of the diagnosed/symptomatic employee's workstation, as well as those common areas potentially infected by the employee.

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

**3. Identification and Isolation of Sick and/or Exposed Employees**

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

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

**a. Employees' Self-Monitoring**

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

- Employees who display COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting, whether or not accompanied by a formal COVID-19 diagnosis;
- Employees who, in the last 14 days, have had close contact with and/or live with any person having a confirmed COVID-19 diagnosis; and
- Employees who, in the last 14 days, have had close contact with and/or live with any person displaying COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting.

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

**b. Daily Screenings**

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

Employees are asked the following questions before entering the worksite:

1. Are you currently suffering from any of the following symptoms – fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting?



- a. If a touchless thermometer is available, temperature checks are performed.
  - b. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until employee is permitted to return to work as defined below.
2. Have you lived with, or had close contact with, someone in the last 14 days diagnosed with or displaying the symptoms of COVID-19?
- a. If yes, access is denied, and employee is advised to self-isolate/self-quarantine at home, until at least 14 days after the close contact.

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

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

#### **c. Return-to-Work Requirements**

Employees who were themselves diagnosed with COVID-19 may only return to work upon per current CDC guidelines and upon confirmation of the cessation of symptoms and contagiousness, proof of which may be acquired via the test-based strategy or the non-test-based strategy.

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

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

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

- At least 3 days (72 hours) have passed since recovery defined as resolution of fever without the use of fever-reducing medications;
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); **and**
- At least 10 days have passed since symptoms first appeared.

Employees who came into close contact with, or live with, an individual with a confirmed diagnosis or symptoms may return to work after either 14 days have passed since the last close contact with the diagnosed/symptomatic individual, or the diagnosed/symptomatic individual receives a negative COVID-19 test.

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

#### **4. Workplace Flexibilities and Potential Benefits for Employees Affected by COVID-19**

Employees affected by COVID-19 may be eligible for paid and unpaid leaves of absence.

Employees may be permitted to utilize available paid-time off provided under Company policy concurrently with or to supplement any approved leave.



Under Emergency Paid Sick Leave (“EPSL”), employees may seek paid leave for the following reasons:

1. Subject to a Federal, State, or local quarantine or isolation order related to COVID-19;
2. Advised to self-quarantine due to concerns related to COVID-19;
3. Experiencing symptoms of COVID-19 and seeking a medical diagnosis;

Full-time employees: 80 hours; Part-time employees equates to number of hours equivalent in a normal worked day

#### **Executive Order 2020-36**

Employees who require leave beyond the EPSL because of their own COVID-19 diagnosis/symptoms, or because they have had close contact or live with an individual with a COVID-19 diagnosis/symptoms, may be eligible for unpaid leave under Executive Order 2020-36 until permitted thereunder to return to work.

##### **a. Unemployment Compensation Benefits**

Under Executive Order 2020-57, and the federal CARES Act, unemployment compensation benefits are expanded in terms of eligibility, amount, and duration.

Employees who are unable to report to work for reasons related to COVID-19 are referred to Human Resources for information on unemployment compensation benefits. Such reasons include the following:

1. Being under self-isolation or self-quarantine in response to elevated risk from COVID-19 due to being immunocompromised;
2. Displaying at least one of the principal symptoms of COVID-19 (i.e., fever, atypical cough, atypical shortness of breath);
3. Having close contact in the last 14 days with a confirmed COVID-19 diagnosis;
4. Needing to care for someone with a confirmed COVID-19 diagnosis; and
5. Fulfilling a family care responsibility as a result of a government directive (e.g., caring for a child whose school or childcare provider is closed or otherwise unavailable due to COVID-19).

##### **a. FMLA and ADA**

Employees may be entitled to unpaid leave under the Family and Medical Leave Act (“FMLA”) if their absence is related to their own serious health condition or that of a family member. COVID-19 may constitute a serious health condition where “complications arise.”

Company is also mindful of its obligations under the Americans with Disabilities Act (“ADA”). Specifically, if an employee requests an accommodation because of a condition that may be complicated by COVID-19 (e.g., cystic fibrosis, emphysema, COPD), then Company engages in the interactive process to provide a reasonable accommodation. This may mean allowing the employee to work remotely (if reasonable) or work an alternative schedule.

#### **5. Training**

Amber will coordinate SARS-CoV-2 training and ensure compliance with all training requirements. A record of training has been established with information that includes the name of the employee(s) trained and the date of the training. The Company has provided onsite workers training on the following:

- Workplace infection-control practices.
- The proper use of personal protective equipment.
- 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.

## **6. Recordkeeping**

The Company will maintain records of the following requirements:

- Training. The employer shall maintain a record of all COVID-19 employee training.
- Screening protocols. The employer shall maintain a record of screening for each employee or visitor entering the workplace.
- When an employee is identified with a confirmed case of COVID-19, record when the local public health department was notified; as well as any co-workers, contractors, or suppliers who may have come into contact with the person who was the confirmed case of COVID-19.
- When an employee is identified with a confirmed case of COVID-19, Acrisure must be notified to ensure required tracking and documentation for OSHA. Please reach out to [coronavirussupport@acrisure.com](mailto:coronavirussupport@acrisure.com).

## **7. Plan Updates and Expiration**

This Plan responds to the COVID-19 outbreak. As this pandemic progresses, Company will update this Plan and its corresponding processes.

This Plan will expire upon conclusion of its need, as determined by Company and in accordance with guidance from local, state, and federal health officials.

Updated November 17, 2020