COVID-19 Preparedness Plan for Anoka Conservation District

ACD is committed to providing a safe and healthy workplace for all our workers and customers. To ensure that, we have developed the following COVID-19 Preparedness Plan in response to the COVID-19 pandemic. ACD supervisors and staff are responsible for implementing and complying with all aspects of this COVID-19 Preparedness Plan while engaging in ACD related activities.

This COVID-19 Preparedness Plan follows Centers for Disease Control and Prevention (CDC) and Minnesota Department of Health (MDH) guidelines, federal OSHA standards related to COVID-19 and Executive Order 20-48, and addresses:

- screening policies;
- paid leave policies;
- identification and isolation of sick persons;
- hygiene and respiratory etiquette;
- physical and administrative controls for social distancing;
- customer controls and protections for drop-off, pick-up and delivery;
- housekeeping, including cleaning, disinfecting and decontamination;
- fieldwork safety guidelines under social distancing;
- working with the public and other agencies;
- communications and training that will be provided; and
- management and supervision necessary to ensure effective implementation of the plan.

Screening and policies for employees exhibiting signs and symptoms of COVID-19

Workers have been informed of and encouraged to self-monitor for signs and symptoms of COVID-19. Each employee should have the ability to check their temperatures at home before coming into work. Employees with a temperature in excess of 100.3 should not come into work. Employees should notify the District Manager by email when they are not coming into work due to symptoms consistent with COVID-19. If an employee begins to display symptoms while working, they should sanitize all areas that they came into contact with while working, cease work, and go home.

Paid Leave Policies

ACD has implemented leave policies that promote workers staying at home when they are sick, when household members are sick, or when required by a health care provider to isolate or quarantine themselves or a member of their household. ACD has implemented the Families First Coronavirus Response Act and the Emergency Family and Medical Leave Expansion Act described below.
**Families First Coronavirus Response Act**

**Qualified reasons:** An employee is eligible for emergency sick leave if he or she is unable to work (or telework) because the employee:

1. is subject to federal, state or local quarantine or isolation order due to COVID-19.
2. has been advised by a health care provider to self-quarantine due to concerns related to COVID-19.
3. is experiencing COVID-19 symptoms.
4. is caring for an individual who qualifies under No. 1 or 2.
5. is caring for a son or daughter of such an employee if the school or place of care of the son or daughter has been closed or the child care provider is unavailable due to COVID-19.
6. is experiencing any other substantially similar condition specified by the secretary of Health and Human Services in consultation with the secretaries of the Treasury and Labor.

**Rate of pay:** For reasons Nos. 1-3, amount of pay shall not exceed $511 per day and $5,110 in total. For reasons Nos. 4-6, amount of pay shall not exceed $200 per day and $2,000 in total, and shall be at two-thirds the employee’s amount of regular pay.

**Duration of paid sick time:** Full-time employees receive up to 80 hours of paid sick time. Part-time employees receive proportional hours equal to the average hours worked over a two-week period. Availability of such sick time shall not carry over from year to year.

**Application:** Leave under this provision is to be used before any other leave. Nothing in this Act shall be construed to diminish the rights or benefits an employee is entitled to under any other law, collective bargaining agreement or existing employer policy. Nor does the Act require financial or other reimbursement to an employee upon the employee’s separation from employment for paid sick time under this Act that has not been used by the employee.

**Emergency Family and Medical Leave Expansion Act**

The Emergency Family and Medical Leave Expansion Act modifies FMLA by expanding coverage to include COVID-19 related inability to work or telework, including taking care of minor children who are home due to school or day care closures. This provision extends through December 31, 2020.

**How Long Is the Leave and Is It Paid?**

As under the regular FMLA leave, the employee is entitled to 12 weeks for leave. The first 10 days are unpaid; however, the employee may elect to substitute accrued vacation, personal medical or sick leave.

Generally, the remaining leave shall be paid at a rate of not less than two-thirds the employee’s salary but not to exceed $200 per day and $10,000 in total.

**How to Log Federal Leave**

The first 10 days that fall under FFCRA have two categories of leave based on the six reasons listed above. Reasons 1-3 pay higher than reasons 4-6. To distinguish between these when logging hours, use C19H for reasons 1-3 and C19L for reasons 4-6. During C19H & C19L phase, there is a 2/3 limit (2/3rd of the hourly rate). Because we track things by hours, we will administer the 2/3rd limit by claiming 2/3rd of the time worked but pay it at the full hourly rate. Since a day off is limited to 8 hours of leave, the most anyone can claim is 5.33 hours in a day. Log hours under the EMB column. If you choose to use the 2/3 pay limit, log hours in the EMB column using a formula (e.g. = 8 * (2/3) = 5.33 hrs for an 8 hour day).
To facilitate payroll calculations please adhere to the following table, which shows daily claim limits based on individual hourly rates compared to the daily dollar cap. Each employee’s beginning balance is also shown, which is prorated based on percent of full-time employment in 2020. Federal guidance was only to base it on the prior pay period, but doing the full current year was more favorable for ACD staff. The federal expansion of FMLA (FED-FMLA) is limited to $200/day with a total of $10,000 and 400 hours. Based on employee salaries, most employees cannot log 8 hours in one day for FED-FMLA. Daily hourly limits are described in the preceding table. Describe hours in the hours log as FED-FMLA and put under the EMB column without a 2/3 correction factor.

**ACD Leave Policies**

Employees may choose whether to follow ACD policy or federal policy.

ACD employees earn Flexible Time Off (FTO – 15-33 days per year with up to 240 hour carryover), Extended Medical Benefit (EMB – 8 days per year with up to 720 hour carryover), and can accumulate Compensatory Time (Comp – up to 60 hour balance) in lieu of paid overtime. How to access these paid leave options is at the discretion of the employee, within policy constraints.

For COVID-19 related absences that extend beyond three business days, employees may use Extended Medical Benefit (EMB) for that portion in excess of three days absence. EMB is generally restricted to FMLA qualifying events, which require treatment by a health care provider two or more times. The Treatment requirement is waived through May 2020 as part of this COVID-19 Policy.

In the event that a regular employee exhausts all FTO, EMB and Comp reserves, they may request in writing to receive an advance on FTO up to 10 days paid leave for COVID-19 related absences. The request must acknowledge that advanced hours will be deducted from future accruals and that in the event that an employee separates from employment with ACD any remaining deficit of FTO hours will be deducted from the employee’s last paycheck. The District Manager may approve the request.

**Managing Leave Hours**

Because of ACD’s generous paid leave structure most of ACD’s staff have sufficient FTO/EMB/COMP to carry them a long time.

During the first two weeks (80 hours FTE) of COVID-19 leave, employees have a choice to make; 1) use EMB and get fully paid, or 2) use COVID-19 leave and receive the rate of pay noted above, which may be less than full compensation.

Following the first two weeks (80 hours FTE) of COVID-19 leave, employees have a choice to make; 1) use EMB and get fully paid, or 2) use FED-FMLA leave and receive up to $200/day.

**Accommodations**

All ACD employees have the discretion to work remotely. All ACD employees have laptops with the capability to access the server remotely. Productivity will be reduced, particularly if remote work is at home with children or other distractions. Employees are trusted to log hours worked only to the extent that they were productive hours. Employees in high-risk categories, or who have household members in high-risk categories are not to be made to feel as if they need to actively defend the precautions they are taking, or to divulge the factors that put them at higher risk. Treat all coworkers as if they fall into a high-risk category, and follow social distancing and other COVID-19 guidelines to ensure you don’t become a vector. All staff, whether high risk or not, have the responsibility and freedom to manage their own risk by declining work tasks, adjusting work conditions, or requiring specific precautions, and to do so without the fear of reprisal.

**Identification and isolation of sick persons**

Any employee showing persistent symptoms of COVID-19 while at work shall take the remainder the day off and assess whether a longer-term absence is warranted. Prior to leaving, the symptomatic employee should wipe down and disinfect surfaces they contacted.
ACD will inform employees if they have been exposed to a person with COVID-19 at their workplace. Employees who are believed to be infected with COVID-19 must quarantine themselves for four weeks. Those exposed to infected individuals shall quarantine themselves for two weeks and may return to work if symptom free after that time. During quarantine, those able to work remotely shall do so.

To protect the privacy of workers’ health status and health information, communications regarding exposure will be through the District Manager without identifying individual employees. Contact tracing will be conducted by the District Manager. Blind copies will be used to inform those who have been in contact with an infected employee. While inquiring about availability for workload assignments, employees should not inquire with each other the reason or duration of leave.

Hygiene
Employees are instructed to wash their hands for at least 20 seconds with soap and water frequently throughout the day, especially at the beginning and end of their shift, prior to any mealtimes, and after using the toilet. All visitors will be required to wash their hands prior to or immediately upon entering the facility. Hand-sanitizers of greater than 60% alcohol can be used for hand hygiene in place of soap and water, as long as hands are not visibly soiled. Restrooms facilities are in close proximity to the entryway, facilitating enforcement of this provision.

Respiratory etiquette: Cover your cough or sneeze
Employees and visitors are instructed to cover their mouth and nose with their sleeve or a tissue when coughing or sneezing and to avoid touching their face, in particular their mouth, nose and eyes. They should dispose of tissues in the trash and wash or sanitize their hands immediately afterward. Respiratory etiquette will be demonstrated on posters and supported by making tissues and trash receptacles available to all workers and visitors. Reminder signage will be displayed strategically throughout the building.

Social distancing
Social distancing is being implemented through the following physical and administrative controls:

- Don’t attend non-essential functions and meetings – participate remotely if possible
- When hosting meetings, provide a means of remote participation
- Use remote communications technologies – email, Skype, phone, conference call
- Minimize contact with the workspace of others
- Minimize physical contact with others – alternative greeting to a handshake
- Maintain six-foot distance between employees and customers
- Use phones to talk with co-workers in the office
- Eat lunch alone at individual desks
- Stagger work schedules
- One person per vehicle
- Meet with customers outside of the office when possible, whether that be off-site or out of doors on site
- Do not gather in groups or confined areas
- Non-medical reusable cloth face coverings were given to employees, which must be washed daily
- Disposable facemasks will be made available if we can secure them
- Nitrile gloves will be available in each vehicle and at the front desk in the office

All employees are responsible to replenish diminished supplies. Bulk supplies will be available in the front closet. Inform the office administrator if supplies in the cabinet are getting low.
Housekeeping
The first employee to arrive at the office each day should immediately attend to regular housekeeping practices including wiping down and disinfecting of common area work surfaces, equipment, tools, restrooms, and the conference room, including door handles, cabinet knobs, bathroom fixtures, and light switches.

Throughout the day, employees in the office should clean and disinfect high-touch areas of common use such as door handles, faucets, countertops, tables, copy machines, bathroom fixtures, and light switches.

After a visitor leaves, the host of the visitor shall wipe down all areas that the visitor touched with a disinfectant wipe.

In the event that an employee is diagnosed with COVID-19, ACD’s cleaning service will be hired to complete a deep cleaning to decontaminate the impacted areas.

Fieldwork Safety Guidelines under Social Distancing
Listed below are guidelines that staff must follow while conducting fieldwork with social distancing:

- Staff must always travel in separate vehicles.
- When possible, each field staff person should have a dedicated vehicle for fieldwork.
- While working together, staff must maintain a minimum of 6 ft. distance between each other.
- It is recommended that staff wear facemasks in situations when in close in proximity to others.
- It is recommended that staff “pay at the pump” and avoid going inside gas stations.
- After leaving the vehicle for gas, food, fieldwork etc., staff should use hand sanitizer and wipe down door handles and steering wheel with disinfectant spray, as needed.
- It is recommended that staff bring their own lunch and water.
- Stagger the times common spaces will be shared by staff; if two staff are conducting field work, they should load their vehicles at separate times to maintain proper distancing.

Working with the public and other agencies – Landowners, Labs, LGU’s, Etc.

- Conduct all communication remotely when possible.
- Call ahead to inquire if there is a specific protocol for visitors, and if the proposed meeting is feasible while maintaining social distancing.
- Limit the number of people involved whenever possible.
- Do not greet with a handshake.
- Maintain social distance of 6 ft. or more during interaction.

Vehicle Cleaning Procedure
This procedure needs to be put into action whenever a vehicle is to switch drivers.

- Remove all personal gear from vehicle.
- Make sure to wipe down the following areas of the vehicle with disinfectant solution:
  - Steering wheel
  - Shifters
  - Dash
  - Center console
  - Door and door handle
  - Seatbelt, buckle, and seatbelt fastener
  - Windows
  - Glove compartment handle
- Wipe down keys
- Wipe down gas credit card if used.
Disinfecting Equipment between Operators

- Start unloading field gear, wiping down hard surfaces as items are removed and before they are returned to their storage places. Leave equipment out to air dry overnight.

Communications and training

This Preparedness Plan was shared in draft form via email with all employees on May 13, 2020 to seek input into its development. Following anticipated revisions and approval by the ACD Board, all employees will be provided a copy via email. Questions about the policies and procedures herein may be directed to the District Manager. Additional communication and training will be ongoing via staff meetings and topic specific emails. Employees should report lapses in implementation to the District Manager, which be used as a measure of how effectively the program has been implemented. ACD staff are to work through this new program together and update the program and training as necessary. This COVID-19 Preparedness Plan has been certified by the Anoka Conservation District and was posted throughout the workplace on May 19, 2020. It will be updated as necessary.

Certified by:

Chris Lord, District Manager
Appendix A – Guidance for developing a COVID-19 Preparedness Plan

General

MDH Coronavirus – www.health.state.mn.us/diseases/coronavirus

Businesses

DLI Updates related to COVID-19 – www.dli.mn.gov/update

Handwashing

www.cdc.gov/handwashing/when-how-handwashing.html
www.cdc.gov/handwashing
https://youtu.be/d914EnpU4Fo

Respiratory etiquette: Cover your cough or sneeze

www.health.state.mn.us/diseases/coronavirus/prevention.html
www.cdc.gov/healthywater/hygiene/etiquette/coughing_sneezing.html

Social distancing

www.health.state.mn.us/diseases/coronavirus/businesses.html

Housekeeping

Employees exhibiting signs and symptoms of COVID-19

www.health.state.mn.us/diseases/coronavirus/basics.html
www.health.state.mn.us/diseases/coronavirus/facilityhltshcreen.pdf

Training

www.health.state.mn.us/diseases/coronavirus/about.pdf
www.osha.gov/Publications/OSHA3990.pdf