

# *MN COVID-19 Preparedness Plans: Critical Businesses*

June 17, 2020

# Speaker

Tim Tacheny  
General Counsel  
[ttacheny@mncun.org](mailto:ttacheny@mncun.org)



# Regulatory Background

- **Executive Order 20-74 – Safely Re-opening the Economy**

- Beginning June 29, critical businesses must implement a COVID-19 Preparedness Plan.
- Plan must include content specified in the Executive Order.
- Must also include any applicable industry guidance from Stay Safe MN website.
- Limitations on social gatherings do not apply to “commercial activity.”

# COVID-19 Preparedness Plan Requirements

## General Content must include:

- Work from home whenever possible.
- Policies and procedures to assist in identifying sick employees and ensuring they stay home.
- Engineering and administrative controls for social distancing.
- Hygiene and source control.
- Cleaning, disinfection and ventilation protocols.
- Drop-off, pick-up and delivery protections and protocols.
- Communications and training practices and protocols.

# COVID-19 Preparedness Plan Requirements

Must include guidance specific to the conditions and circumstances of the business.

Must provide for implementation of OSHA standards as well as Minnesota Department of Health (MDH) and CDC guidelines.

Senior Management responsible for implementation (must sign and certify the plan).

Provide the plan in writing to all employees and post in places that will allow for it to be “readily reviewed” by (posted electronically when physical posting is impracticable).

Employers must train employees on the contents of the plan and required procedures.

All employees are responsible for assuring the plan is followed.

Not required to submit plan to regulatory authorities but must make it available upon request.

# Access Your Risk Level

OSHA provides four classifications of occupational exposure risk: Lower Risk, Medium, High and Very High

**Very High and High** – high potential or potential for exposure to source of COVID-19 (e.g., healthcare workers).

**Medium** – frequent or close contact (within 6 ft of) persons who may be infected (e.g., schools, high-volume retail).

**Lower Risk** – jobs that do not require close contact with people, minimal contact with the public.

Classification dictates response

What types of controls should be put in place? (engineering, administrative, etc.)

Should personal protective equipment be used? (e.g., OSHA does not recommend PPE for Lower Risk jobs)

# Ensuring Employees who can work from home, do



It is highly recommended that employers encourage and allow (if not require) employees who can work from home - continue to do so.

# Prompt Identification and Isolation of Sick Employees

Establish health screening protocols (screening questions, temperature taking) for employees at the start of each shift.

- Credit unions may, but are not required to, take an employee's temperature.

Establish procedures for isolating employees with COVID-19 symptoms and employees who have been exposed and send them home.

Establish protocols for employees to report sickness or symptoms – Doctor's note not recommended. Designate an individual ("work-place coordinator") to maintain communication with and gather information from employees who may be ill.

Implement a process to notify employees potentially exposed (Remember your confidentiality requirements). Exposure does not mean employee must be sent home (See CDC Guidance).

Plan should include how you will accommodate at-risk employees.

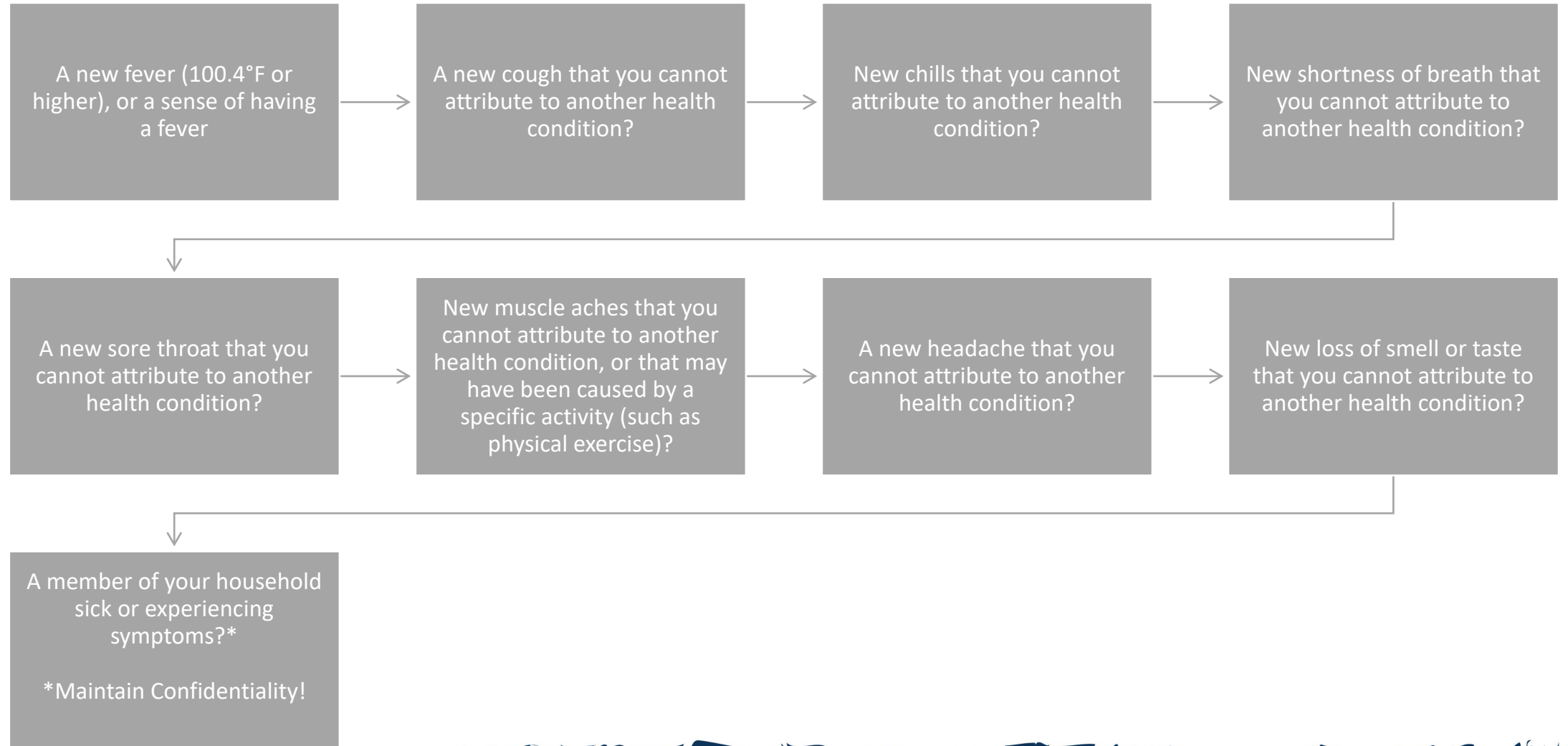
Make sure employees are aware of leave policies.

Establish procedures for when employees may return to work.

Evaluate and adjust sick leave policies to reflect the need for isolation and incentivize sick workers to stay home



# Health Screening Questions



# Social Distancing – at least six feet apart



Maximize telecommuting.



Stagger shifts and breaks;  
create additional shifts.



Evaluate traffic patterns to  
reduce crowding in entrances,  
hallways, lobbies, etc.



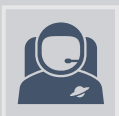
Limit gatherings of employees  
to 10 or less.



Ensure physical distancing,  
including workstations.



Limit interaction among floors  
and different offices.



Increase physical space  
between employees and  
members (physical barriers).

# Employee Hygiene and Source Control

Train and ensure that employees are washing their hands properly and frequently.

Make sure handwashing and hand-sanitizer facilities are readily available.

Post CDC signs for hygiene and respiratory etiquette.

Provide protective supplies, non-medical cloth masks, gloves, disinfectant, guard and shields, etc.

Encourage the use of non-medical cloth masks.

Shut off water-fountains. Use touchless water filling stations.

Provide tissues for proper cough/sneeze etiquette and no-touch waste receptacles.

Prohibit on-site food preparation and sharing.

To the extent possible prohibit employees from sharing the use of office equipment.

# Building and Ventilation Protocols

- Review the Preparedness Plan Checklist.
- Follow established protocols for starting systems after non-use.
- Assess building for indications of pest and vermin infestation.
- Follow CDC Guidance for reopening buildings after prolonged shutdown or reduced operation (See Resources for link to guidance).
- Increase outdoor air-percentage and eliminate recirculating whenever possible.
- If HVAC System recirculates, improve central air filtration to recommended level.
- Replace filters.

# Cleaning and Disinfection Protocols

- Establish documented sanitation schedule and checklist and routinely clean all areas.
- Frequently clean (at least daily) high-touch surfaces.
- Don't share Personal equipment and disinfect if you do.
- Establish a procedure for decontaminating if an employee becomes sick with COVID-19.
- EPA approved disinfectants (EPA list approved against SARS-CoV-2).
- PPE for cleaning and disinfecting.

# Drop-off, pick-up and delivery practices and protocol

- Contactless method whenever possible.
- Don't let them in the door.
- Electronic is best.
- Minimize unnecessary sharing and exchanging.
- Safe social distancing.

# Communications and Training Practices and Protocols

1

All employees and management must be trained regarding COVID-19 exposure and plan.

2

Post Plan at all workplaces in readily available locations.

3

Communicate and enforce rules and practices.

4

Communicate and educate members about steps being taken for their protection.

# Additional Guidance for Customer Facing Businesses

- **Receiving or Exchanging Payment**
  - Contactless exchanges whenever possible.
  - Use physical barriers or maintain six feet.
  - Wear non-medical masks.



# Additional Guidance for Customer Facing Businesses

- **Managing Occupancy**

- Limit to no more than 50% capacity.
- Limit to allow for safe social distancing.
- Inform members of the limitations and protocols.
- Encourage higher-risk members to avoid coming into branches
- Post signage at entrance outlining protocols.
- Use health screenings prior to entry.
- Do not allow entry for members if there is suspicion of symptoms.
- Restrict Access.

# Additional Guidance for Customer Facing Businesses

- **Protocols for face-to-face interactions with Members**
  - Evaluate ways to provides services other than face-to-face.
  - Barriers are recommended.
  - Employees and members should wear masks.
  - Establish a protocol for members who refuse to wear a mask.
  - Take additional measures when the service requires a member to remove their mask.

# Resources

Stay Safe Minnesota  
Website – [Guidance For  
Businesses](#)

OSHA – [Guidance on  
Preparing Workplaces  
for COVID-19](#)

CDC – [How to  
discontinue home  
isolation](#)

CDC – [Guidance on  
decontaminating the  
workplace](#)

Minnesota Department  
of Employment &  
Economic Development  
[For Businesses: Safely  
Returning to Work](#)

DEED – [General  
Industry Guidance](#)

[Current Plan Template  
and Instructions](#)

[Preparedness Plan  
Requirements Checklist](#)

CDC – [Guidance for  
Reopening Buildings  
After Prolonged  
Shutdown or Reduced  
Operation](#)

CDC – [Coping with Job  
Stress Related to  
COVID-19 Pandemic](#)