

People's Food Co-op

SARS-CoV-2 (COVID-19) Preparedness and Response Plan 2020

People's Food Co-op is committed to providing a safe and healthy workplace for all our employees and customers. To ensure we have a safe and healthy workplace, we have developed the following COVID-19 Preparedness Plan in response to the COVID-19 pandemic. All employees are responsible in a variety of ways for implementing this plan. Our goal is to mitigate the potential for transmission of COVID-19 in our workplace and community, and that requires full cooperation among our employees and customers. Only through this cooperative effort can we establish and maintain the safety and health of our employees and store.

PFC leadership and employees are responsible for implementing and complying with all aspects of this COVID-19 Preparedness Plan. PFC's managers and supervisors have our full support in enforcing the provisions of this policy.

Our employees are our most important assets. We are serious about safety and health and keeping our staff working at PFC. Our COVID-19 Preparedness Plan follows the direction of: Centers for Disease Control and Prevention (CDC), Michigan Department of Health and Human Services (MDHHS), Washtenaw County Health Department guidelines, Governor Whitmer's Executive orders and federal OSHA standards related to COVID-19.

Statement of Intent

This document is intended to serve as a guide for management and staff of PFC as we respond to the COVID-19 pandemic. These guidelines are presented with the recognition that management will need to consider the evolving nature of the pandemic and a combination of events that may be occurring at any given time.

Information in this document specifically addresses the COVID-19 pandemic.

Priorities

PFC's priorities in any pandemic situation will be the following:

1. Protect employees from illness and meet their needs for support.
2. Provide the products and services essential to the well-being of our members, customers, and community.
3. Help PFC remain in operation during and after a pandemic.

Overview

For COVID-19, CDC states that the virus is thought to spread mainly from person-to-person.

- Between people who are in close contact with one another (within 6 feet).
- Through respiratory droplets produced when an infected person coughs or sneezes. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs.

Persons infected with the virus may infect others before they show symptoms and many days after. For this reason, all employees and customers, including those without symptoms, must follow good hygiene practices. We will instruct sick people to stay home, keep surfaces cleaned and disinfected, wear facial coverings over nose and mouth (when they can be medically tolerated), and practice "social distancing", which keeps individuals at least six feet apart whenever possible, or separated by barriers.

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

Employees have been informed of and encouraged to self-monitor for signs and symptoms of COVID-19. The following policies and procedures are being implemented to assess employee's health status prior to entering the store and for workers to report when they are sick or experiencing symptoms:

Before entering, at the beginning of every shift PFC employees complete a health screening per Washtenaw County Health Department and State guidelines:

"A. Ask if the employee has symptoms of fever of 100.4 degrees F or higher (as measured by a touchless thermometer if available, but a verbal confirmation of lack of fever is sufficient if a touchless thermometer is not available); cough (excluding chronic cough due to a known medical reason other than COVID-19); shortness of breath; sore throat; or diarrhea (excluding diarrhea due to a known medical reason other than COVID-19). The presence of any symptoms is a concern;

B. Ask if the employee travelled internationally or outside of Michigan in the last 14 days, excluding commuting from a home location outside of Michigan. For purposes of this order, commuting is defined as traveling between one's home and work;

C. Ask if the employee had any close contact in the last 14 days with someone with a diagnosis of COVID-19.

2. An affirmative response to screening question 1 (A) above requires the individual to be excluded for at least 72 hours with no fever (three full days of no fever without use of medicine

that reduces fever) and other symptoms have improved (for example, cough and shortness of breath have improved) and at least ten days passed since symptoms began.

3. An affirmative response to screening question 1 (B) above requires the individual to be excluded for 14 days following travel unless that travel was due to commuting from a home location outside of Michigan. Exceptions include necessary workers engaged in travel related to supply chain and critical infrastructure.

4. An affirmative response to screening question 1 (C) above requires the individual to be excluded for 14 days following the last exposure to the individual diagnosed with COVID-19. Exemptions include healthcare institutions, public health functions, pharmacies and other entities that are involved in the mitigation of risk during this pandemic.”

If an employee becomes sick during their shift they are to be immediately sent home.

Employees who experience any of above symptoms while not in the store (or who are sent home after experiencing any symptoms) are instructed to contact their manager and the HR Director and the above requirement for return to work are put into place.

If a member of PFC staff is confirmed to have COVID-19 upon learning of the diagnosis PFC will within 24 hours: contact the state and/or local health department and comply with all their recommendations, deep clean/sanitize all areas where the employee worked or used and contact all co-workers, vendors and customers (as possible) who had close contact with the individual.

PFC 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.

Employees are able to take paid leave time under The Families First Coronavirus Response Act. This Act provides financial relief and other assistance to employees and their families who are impacted by Covid-19. As of April 1, 2020, paid leave is available as follows:

a. Emergency Paid Sick Leave Act. This Act provides paid sick leave to an employee who is unable to work or telework because the employee meets the following conditions:

i. Employees are entitled to take 80 hours of paid leave at their regular rate of pay (or pro-rated for part-time employees) if the employee is:

- subject to a quarantine or isolation order
- has been advised by a healthcare provider to quarantine
- is experiencing symptoms or seeking a medical diagnosis of coronavirus.

ii. Employees are entitled to two-thirds of their regular rate of pay to care for an individual for the reasons stated above, care for a child because the child's school or place of care has been closed or because the childcare provider is unavailable due to coronavirus or the employee is experiencing any other substantially similar condition specified by the Secretary of Health and Human Services in consultation with the Secretary of the Treasury and the Secretary of Labor.

iv. After exhausting the 80 hours of emergency paid sick leave, the employee may be eligible to continue to be paid for a total of up to 12 weeks under the Emergency Family Medical Leave (EFML) described below.

b. Emergency Family Medical Leave (EFML): Eligible employees include anyone who has worked for the Co-op for 30 days and requests leave if they are unable to work because they need to care for their minor child due to closure of their child's school or day care center, or whose child care provider is unavailable due an emergency declaration by federal, state, or local authorities related to COVID-19.

- Eligible employees will receive unpaid leave for the first 10 days or may elect to use any accrued paid leave (including, if applicable emergency paid sick leave during that time period).
- After 10 days the emergency EFMLA leave is paid.
- The total EFML leave can extend for up to 12 weeks.
- Employees taking EFMLA leave will be paid at a rate equal to two-thirds of their regular rate multiplied by the number of hours in their average work week.
- Employees who take EFMLA leave are entitled to job restoration rights and the continuance of their health insurance provided they pay their portion.

In addition to these Emergency Leaves, the PFC standard FMLA is also in place and that policy is Appendix B. During the COVID-19 pandemic, rules governing the hours worked before becoming eligible for FMLA and the requirement to use paid time off are waived. The requirements for certification of a health care provider are relaxed.

An employee not showing symptoms of Covid-19, not under quarantine orders by a health care provider, and who does not otherwise meet the requirements of Emergency Sick Leave or Emergency Family Medical Leave may choose to take an unpaid personal leave. For employees who choose this type of leave, the Co-op will make every reasonable effort to return them to their job but does not guarantee and has no obligation to return an employee on those types of leaves to work.

- As it becomes known, PFC will disclose to other employees that a co-worker (or a member of the public who has been in the store) has tested positive for COVID-19, without disclosing any identities.
- PFC will not disclose the identity of an employee who has tested positive, or anything specific about his/her medical condition or symptoms, to others in the workplace. Under the ADA, any information regarding the medical condition or history of an employee that an employer obtains as part of an examination or inquiry into a disability could constitute a confidential medical record that can be disclosed only to certain individuals in limited circumstances.
- PFC may ask whether an employee is willing to disclose symptoms or a positive diagnosis to others, or whether the employee is comfortable with the employer's doing so. PFC will exert no pressure on the employee to agree to either mode of disclosure. Any disclosure of identity under these circumstances will be voluntary on the part of the employee.
- PFC will ask an employee who has tested positive to provide a list of individuals (employees, vendors, etc.) with whom the employee came in contact in the last 14 days in connection with their employment. PFC will disclose this information to other employees (without disclosing the identity of the individual), but will first discuss this with the employee.
- Even if it is not possible to get prior consent from an employee who has tested positive for COVID-19, PFC will notify specific co-workers, vendors, etc. that a person with whom they were in contact over the past 14 days has now tested positive, and that they should take appropriate cautionary measures.

Handwashing

Employees are instructed to wash their hands for at least 20 seconds with soap and water frequently throughout the day, but especially at the beginning and end of their shift, prior to any mealtimes and after using the toilet. All customers are strongly encouraged to wash or sanitize their hands prior to or immediately upon entering the store. Hand-sanitizer dispensers (that use sanitizers of greater than 60% alcohol) are at the entrance (for customers) and throughout the store (for staff) so they can be used for hand hygiene in place of soap and water, as long as hands are not visibly soiled. Disposable gloves will be available throughout the store for employee and customer use.

Social Distancing

Social distancing of six feet will be implemented and maintained between employees and customers in the store to the greatest extent possible through the following:

- Staff will be encouraged to work from home (provided their work can reasonably be done remotely and projects are available).
- Signs and indicators of a 6 foot distance will be placed prominently throughout the store including: at the entrance, 6 foot markers for customers waiting in the checkout line, 6 foot markers for customers outside waiting to come into the store.
- Headcount in the store will be limited to 25% of our capacity (including staff). Once capacity is reached customers will only be allowed in the store once another customer has left.
- All staff will be required to wear face masks (if they can be medically tolerated) if they are working within 6 feet of other employees or customers and PFC will supply face masks for employees. Customers will be strongly encouraged to wear masks as well.
- Plastic barriers will be put in place at cash registers where social distancing between staff and customers is not possible.

Cleaning and Sanitizing

Regular sanitizing practices have been implemented, including routine cleaning and disinfecting of: work surfaces, equipment, and tools and areas in the work environment, including restrooms, the break room, the meeting room. Frequent cleaning and disinfecting will be conducted in high-touch areas, such as phones, keyboards, touch screens, door handles, checkout stations, display doors, bulk bin handles, shopping carts and baskets, railings, and credit card readers, etc.

Cleaning/sanitizing is broken down by department so all areas of the store can be sanitized with the necessary frequency and daily sanitization checklists are filled out indicating frequency of cleaning, areas cleaned and completion of cleaning. Disinfecting is done with a combination of quaternary ammonium and Seventh Generation disinfecting wipes (both on the EPA's list of disinfectants to use against COVID-19).

Additional after hours full store sanitization is also performed.

Communications and Training

This COVID-19 Preparedness Plan was communicated via hard copy to all employees on June 2nd, 2020 and necessary training was provided. Additional communication and training will be

ongoing both in person and via email and provided to all employees who did not receive the initial training.

Instructions will be communicated to customers via signage about: picking up online orders and in-store shopping to ensure social distancing between the customers and staff; required hygiene practices; and recommendations that customers wear masks (when they can be medically tolerated). Customers will also be advised not to enter the store if they are experiencing symptoms or have contracted COVID-19.

Managers and supervisors are to monitor how effective the program has been implemented by regularly monitoring state, local and federal guideline changes for grocery retail businesses.

PFC staff are to work through this new program together and update the training as necessary.

This COVID-19 Preparedness Plan has been certified by People's Food Co-op management and was posted throughout the workplace on June 2nd, 2020. It will be updated as necessary.

In cooperation,

Angie Voiles

General Manager

Appendix A:

General

Centers for Disease Control and Prevention (CDC): Coronavirus (COVID-19) –

www.cdc.gov/coronavirus/2019-nCoV

State of Michigan- <https://www.michigan.gov/coronavirus/>

Washtenaw County- <https://www.washtenaw.org/3095/COVID-19>

Health Screening

Washtenaw County Health Department Emergency Order:

<https://www.washtenaw.org/DocumentCenter/View/15840/Emergency-Orders-to-Protect-Workers-Updated-through-5-28?bidId=>



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Appendix B:

People's Food Cooperative Family and Medical Leave Policy (FMLA)

A. General Provisions

It is the policy of this company to grant up to 12 weeks of family and medical leave during any 12-month period to eligible employees, in accordance with the Family and Medical Leave Act of 1993 (FMLA). The leave may be paid, unpaid or a combination of paid and unpaid leave, depending on the circumstances of the leave and as specified in this policy.

B. Eligibility

To qualify to take family or medical leave under this policy, the employee must meet all of the following conditions:

- 1) The employee must have worked for the employer for 12 months or 52 weeks. The twelve months or 52 weeks need not have been consecutive. For eligibility purposes, an employee will be considered to have been employed for an entire week even if the employee was on the payroll for only part of a week or if the employee is on leave during the week.
- 2) The employee must have worked at least 1250 hours during the twelve-month period immediately before the date when the leave is requested to commence. The principles established under the Fair Labor Standards Act (FLSA) determine the number of hours worked by an employee. The FLSA does not include time spent on paid or unpaid leave as hours worked. Consequently, these hours of leave should not be counted in determining the 1250 hours eligibility test for an employee under FMLA.
- 3) The employee must work in an office or worksite where 50 or more employees are employed by the company within 75 miles of that office or worksite. The distance is to be calculated by using available transportation by the most direct route.

C. Type of Leave Covered

To qualify as FMLA leave under this policy, the employee must be taking leave for one of the reasons listed below:

- 1) The birth of a child and in order to care for that child;



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2) The placement of a child for adoption or foster care and to care for the newly placed child;

3) To care for a spouse, domestic partner, child or parent with a serious health condition; or

4) The serious health condition (described below) of the employee.

An employee may take leave because of a serious health condition that makes the employee unable to perform the functions of the employee's position. A serious health condition is defined as a condition which requires inpatient care at a hospital, hospice or residential medical care facility, including any period of incapacity or any subsequent treatment in connection with such inpatient care or a condition which requires continuing care by a licensed health care provider.³

This policy covers illnesses of a serious and long-term nature, resulting in recurring or lengthy absences.⁴ Generally, a chronic or long-term health condition, which if left untreated, would result in a period of incapacity of more than three days, would be considered a serious health condition.

Employees with questions about what illnesses are covered under this FMLA policy or under the company's sick leave policy are encouraged to consult with the Human Resource Department.

The company may require an employee to provide a doctor's certification of the serious health condition. The certification process is outlined in section H.

If an employee takes paid sick leave for a condition that progresses into a serious health condition and the employee requests unpaid leave as provided under this policy, the company may designate all or some portion of related leave taken as leave under this policy, to the extent that the earlier leave meets the necessary qualifications.

An eligible employee can take up to 12 weeks of leave under this policy during any 12-month period. The company will measure the 12-month period as a rolling 12-month period measured backward from the date an employee uses any leave under this policy. Each time an employee takes leave, the company will compute the amount of leave the employee has taken



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under this policy and subtract it from the 12 weeks of available leave, and the balance remaining is the amount the employee is entitled to take at that time.⁵

If a husband and wife, or domestic partners both work for the company, and each wishes to take leave for the birth of a child, adoption or placement of a child in foster care, or to care for a parent (but not a parent "in-law") with a serious health condition, the husband and wife may only take a combined total of 12 weeks of leave.

D. Employee Status and Benefits during Leave

While an employee is on leave, the company will continue the employee's health benefits during the leave period at the same level and under the same conditions as if the employee had continued to work.

If the employee chooses not to return to work for reasons other than a continued serious health condition of the employee or the employee's family member or a circumstance beyond the employee's control, the company will require the employee to reimburse the company the amount it paid for the employee's health insurance premium during the leave period.⁶

Under current company policy, the employee pays a portion of the health care premium. While on paid leave, the employer will continue to make payroll deductions to collect the employee's share of the premium. While on unpaid leave, the employee must continue to make this payment, either in person or by mail. The payment must be received in the Accounting Department by the 15th day of each month. If the payment is more than 30 days late, the employee's health care coverage may be dropped for the duration of the leave. The employer will provide 15 days' notification prior to the employee's loss of coverage.

If the employee contributes to a life insurance or disability plan, the employer will continue making payroll deductions while the employee is on paid leave. While the employee is on unpaid leave, the employee may request continuation of such benefits, and pay their portion of the premiums; or the employer may elect to maintain such benefits during the leave and pay the employee's share of the premium payments. If the employee does not continue these payments, the employer may discontinue coverage during the leave. If the employer maintains coverage, the employer may recover the costs incurred for paying the employee's share of any premiums whether or not the employee returns to work.



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E. Employee Status after Leave

An employee who takes leave under this policy will be able to return to the same position or a position with equivalent status, pay, benefits and other employment terms. The position will be the same or one, which is virtually identical in terms of pay, benefits and working conditions.

The company may choose to exempt certain highly compensated employees from this requirement and not return them to the same or similar position.

F. Use of Paid and Unpaid Leave

If the employee has accrued or earned paid leave the employee must use paid leave first and take the remainder of the twelve weeks as unpaid leave. The company will notify the employee within two business days in writing or orally (to be confirmed in writing by no later than the employee's next regular payday) whether or not the leave will be designated as FMLA leave.

An employee who is taking leave because of the employee's own serious health condition or the serious health condition of a family member must use all paid vacation, personal or sick leave prior to being eligible for unpaid leave.⁷ Sick leave may be substituted for unpaid FMLA leave if the reason for the FMLA leave is covered by the established sick leave policy.

Disability leave for the birth of the child and for an employee's serious health condition, including workers' compensation leave (to the extent that it qualifies), will be designated as FMLA leave and will run concurrently with FMLA leave. For example, if an employer provides six weeks of pregnancy disability leave, the six weeks can be designated as FMLA leave and counted toward the employee's 12 week entitlement. The employee may then be required to substitute accrued (or earned) paid leave as appropriate before being eligible for unpaid leave for what remains of the 12 week entitlement.

An employee who is taking leave for the adoption or foster care of a child must use all paid vacation, personal or family leave prior to being eligible for unpaid leave.

G. Intermittent Leave or a Reduced Work Schedule

The employee may take FMLA leave in 12 consecutive weeks, may use the leave intermittently (take a day periodically when needed over the year) or under certain circumstances may use



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the leave to reduce the work week or work day, resulting in a reduced hour schedule. In all cases, the leave may not exceed a total of 12 workweeks over a 12-month period.

The company may temporarily transfer an employee to an available alternative position with equivalent pay and benefits if the alternative position would better accommodate the intermittent or reduced schedule, for leave for the employee or employee's family member that is foreseeable and for planned medical treatment, including recovery from a serious health condition or to care for a child after birth, or placement for adoption or foster care.

For the birth, adoption or foster care of a child, the company and the employee must mutually agree to the schedule before the employee may take the leave intermittently or work a reduced hour schedule. Leave for birth, adoption or foster care of a child must be taken within one year of the birth or placement of the child.

If the employee is taking leave for a serious health condition or because of the serious health condition of a family member, the employee should try to reach agreement with the company before taking intermittent leave or working a reduced hour schedule. If this is not possible, then the employee must prove that the use of the leave is medically necessary. The company may require certification of the medical necessity as discussed in Section H.

H. Certification of the Serious Health Condition

The company may ask for certification of the serious health condition. The employee should try to respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of continuation of leave. Medical certification may be provided by using the Medical Certification Form or the doctor's own custom form including all relevant information. Request for a medical certificate must be made in writing as part of the employer response to employee request for leave.

Certification of the serious health condition shall include: the date when the condition began, its expected duration and a brief statement of treatment. For medical leave for the employee's own medical condition, the certification must also include a statement that the employee is unable to perform work of any kind or a statement that the employee is unable to perform the essential functions of the employee's position. For a family member who is seriously ill, the certification must include a statement that the patient, the family member, requires assistance and that the employee's presence would be beneficial or desirable.



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If the employee plans to take intermittent leave or work a reduced schedule, the certification must also include dates and the duration of treatment as well as a statement of medical necessity for taking intermittent leave or working a reduced schedule.

The company has the right to ask for a second opinion if it has reason to doubt the certification. The company will pay for the employee to get a certification from a second doctor, which the company will select.⁸ If necessary to resolve a conflict between the original certification and the second opinion, the company will require the opinion of a third doctor. The company and the employee will mutually select the third doctor and the company will pay for the opinion. This third opinion will be considered final. The employee will be provisionally entitled to leave and benefits under the FMLA pending the second and/or third opinion.

I. Procedure for Requesting Leave

All employees requesting leave under this policy must provide verbal notice with an explanation of the reason(s) for the needed leave to their immediate supervisor, who will advise the Human Resources Department. If the leave is foreseeable, the immediate supervisor may require the employee to provide a written request for leave and reasons(s) with a copy to the Human Resources Department. Failure of the employee to provide a written request for leave cannot be grounds to deny or delay the taking of FMLA leave.

The company will provide individual notice of rights and obligations to each employee requesting leave within two business days or as soon as practicable. For employees on intermittent or recurring leave for the same incident this notice will be provided every six months.

When an employee plans to take leave under this policy, the employee must give the company 30 days' notice. If it is not possible to give 30 days' notice, the employee must give as much notice as is practicable. An employee who is to undergo planned medical treatment is required to make a reasonable effort to schedule the treatment in order to minimize disruptions to the company's operations.

If an employee fails to provide 30 days' notice for foreseeable leave with no reasonable excuse for the delay, the leave request may be denied until at least 30 days from the date the employer receives notice. While on leave, employees are requested to report periodically to the company regarding the status of the medical condition and their intent to return to work.