

LTBB GOVERNMENT PHASE 2.5 COVID-19 RE-OPENING PLAN

Phase 2.5 (Began: November 18, 2021 NOW Ends: January 16, 2022)

12/03/21

Introduction

The Little Traverse Bay Bands of Odawa Indians (herein after, “LTBB”) government operations have been dealing with the COVID-19 pandemic since the beginning of March of 2020. A declaration of emergency was declared by the Tribal Chair and an Emergency Management Team (herein after, “EMT”) was formed to combat the pandemic. A multi-phase re-opening plan with workplace safety precautions was developed to protect against the pandemic. The overall goal of LTBB’s COVID-19 Multi-Phase Re-Opening Plan is to provide employees with as safe as an environment as possible and protect privacy, while providing governmental services to our tribal community. Government operations will continue to strive to do our part to help flatten the curve in the State of Michigan and our tribal community.

Since the beginning of the pandemic, LTBB government operations has done the following phase timeline to help protect our employees, tribal citizens, and tribal community:

- Shutdown of Government Operations: March 17, 2020 – May 17, 2020
- Phase I: May 18, 2020 – June 27, 2020
- Phase II: June 28, 2020 – May 29, 2021
- Phase III: May 30, 2021 – July 3, 2021
- Normal Operations (New Normal) July 4, 2021 – Sept. 18, 2021
- Phase IV Sept. 19, 2021 – Sept. 27, 2021
- Phase 3.5 Sept. 28, 2021 – Nov. 17, 2021
- Phase 2.5 Nov. 18, 2021 – Jan. 16, 2022

Phase 2.5 began November 18, 2021 and NOW ends Saturday, January 16th, 2022. Phase 2.5 goals support our reopening plan mission. A bulleted summary of our previous phases is at the end of this document.

I. Phase 2.5 (November 18, 2021 – January 16, 2022: this period may be changed based on consultation with Medical Directors)

A. Access to Government Buildings.

1. Government buildings will be open to citizens and guests needing to conduct business by appointment only.
2. Citizens and guests are encouraged to conduct business by electronic means whenever possible.
3. Temperature checks and questionnaire are required for citizens and guests entering the buildings.

- a. Any citizen or guest who fails the health screening process is not permitted in the buildings and must leave immediately. This includes any individuals the citizen or guest has with them at time of failed screening.
 - b. All citizens and guests to use main entrance doors and to remain at check-in/check-out stations until department personnel can be called to come escort them to and from the department providing services.
 - c. All citizens and guests are to practice social distancing, use hand sanitizer station, and wear masks indoors at any LTBB building.
 - d. Vendors will continue to use their usual delivery entrances.
- 4. Office hours will be Monday thru Friday from 8:00 am to 5:00 pm. Due to the COVID-19 health screening process, employees are expected to be at their desk by 8:15am.
 - 5. Access to buildings outside of normal working hours is only permitted with approval of Director.
 - 6. Employees working at 7500 Odawa Circle will continue to use the Main Front entrance. Employee screenings at the Main Front Door will begin at 8:00 am Monday through Friday. All employees must first check-in through the main front doors before entering the buildings at any other entrance

B. Employee Conditions & Requirements.

- 1. Employees are encouraged to get the COVID-19 vaccination. The vaccine is available to ALL employees at the LTBB.
- 2. All offices will be open during normal business hours with an in-person staffing level no greater than 50%, i.e. if there are four employees in an office, only two will be permitted to work in office at any one time. Unit Directors, the CFO, or Branch Manager may adjust office capacity as needed. Employees not working in the office will telework.
- 3. Telework requirements: Telework agreements are to be approved by Director.
 - a. Documentation required for teleworking:
 - i. Telecommuting Agreement Form
 - ii. Telecommuting Productivity Tracking Form is required to be completed weekly and monitored by Directors.
- 4. **Personal Protection Equipment (PPE):** Employees will wear masks while indoors at any LTBB building, regardless of vaccine status, except when the employee works in a solo office space and is alone in their office space. Masks will be provided by LTBB or employees can provide their own fabric masks, if

they agree to launder the mask daily. Disposable masks are to be discarded after being used for one day.

5. **Health Screening.** Employees working in office must comply with health screening requirements.
 - a. Temperature checks and health questionnaires will continue to be administered to employees prior to entering government buildings.
 - b. Temperature checks and the completion of the health questionnaire are required for entry to the building. All temperature checks will be recorded by the test administering staff member. Health questionnaire forms must be forwarded to Safety Coordinator/Emergency Manager-Sue Gasco once completed.
 - c. A temperature of 99.5 degrees or above will be rechecked with an oral thermometer.
 - d. Refer to Decision Tree for Failed Screenings document for steps to take in case an employee fails the Health Screening.
 - e. Employees **MUST** self-report any illness or symptoms of COVID-19 to their immediate supervisor immediately. Failure to do so will be subject to progressive discipline.
 - f. Employees are to remain home if they display any of the symptoms related to COVID-19: Cough, shortness of breath or difficulty breathing, chills, fatigue, muscle or body aches, headache, new loss or change of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, diarrhea. Symptoms are defined by MDHHS/CDC. <https://www.cdc.gov/>
 - g. **Consequences:** Employees who do not comply with any guidelines, including mandatory PPE, temperature checks, self-reporting any illness or symptoms of COVID-19, and telework requirements will be subject to **progressive discipline**.
 - h. LTBB may choose to implement COVID testing for employees. Prior to the implementation of testing, notice shall be given to employees regarding the nature of the COVID testing and the conditions under which such testing may be required.
 - i. **Enforcement:** Supervisors and Directors are responsible for enforcing COVID guidelines and restrictions within their programs.

C. In-Person Events and Meetings: Indoor/Outdoor

1. **Indoor meetings:** are allowed with a capacity of five (5) people. Workplace safety precautions must be followed. Organizers are encouraged to conduct these

meetings and events using zoom or other electronic method. This includes participation with other organization's meetings and events.

2. **Indoor/Outdoor events:** In-person indoor/outdoor events are prohibited unless approved by the Unit Director, CFO, or Branch Manager and Tribal Chairperson. A safety plan must be approved by Safety Coordinator/Emergency Manager- Susan Gasco prior to an event being approved. A safety template is available for event coordinators to use for convenience.

D. Travel. Employee business travel is cancelled until further notice.

E. Workplace Safety Precautions

1. All buildings cleaned daily and deep cleaned weekly.
2. Departmental trash and compost pickup is back to normal schedule.
3. Kitchens are closed to employees except for use of the ice machine. Employees are responsible to disinfect area before and after use.
4. Water Filling stations are open. Drinking fountains are closed.
5. Employees are permitted to use break areas with social distancing. Employees are responsible to disinfect area before and after use.
6. Facilities staff will clean the buildings daily and deep clean the buildings weekly as defined by their COVID-19 procedures. Weekly deep cleaning will be conducted outside regular business hours. Common spaces, including bathrooms, kitchens, and break rooms, will be disinfected with the Clorox 360 machine daily.
7. Employees are to limit their travel within the buildings whenever possible.
8. Employees are to use hand sanitizer whenever they leave their office.
9. At the end of each work day, employees will use disinfecting wipes or cleaning products/paper towels to clean their offices and workstations.
10. Employees are required to utilize proper hand washing/hand sanitizing techniques while in office.¹
11. Employees must use disinfecting cleaning supplies on all surfaces they come in contact with including doorknobs, doors, desks, computers, copiers, etc.
12. Employees are required to use proper sneeze and cough etiquette, i.e. coughing into your elbow, or otherwise covering the mouth.
13. Employees must practice social distancing of 6 feet within the workplace whenever possible. Example: It is understood that employees may not be able to stay 6 feet apart while passing each in a hallway or within an office suite.
14. **Lunches and Breaks:**
 - a. Lunches may be eaten at desks as long as social distancing can be maintained.
 - b. Social distancing must be adhered to while on all breaks.
 - c. Employees are able to leave the buildings for lunch and breaks (although employees must remain on LTBB grounds on breaks).
15. Tribal vehicles are to be sanitized following their use.
16. Employees are encouraged to wash and/or sanitize their hands after handling documents.

¹Guidance on hand washing and hand sanitizing can be found at, <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html>.

17. Health and safety posters and handouts related to COVID-19 are available for all employees upon request.

F. Leave Programs Available: Regular leave programs outlined in employee handbook are available. Please refer to the employee handbook for leave program information.

II. COVID-19 Outbreak in the Workplace

A. Definition of Outbreak. An Outbreak occurs when we have two or more employees test positive for COVID-19 in a department or office suite within seven days, or an outbreak can be determined by Executive Leadership.

B. Notification:

1. Directors: Affected directors will be notified of the outbreak as soon as an outbreak is discovered and a decision on response is determined.
2. Employees: Affected employees will be notified of the outbreak by their director immediately.
3. Non-Affected directors, employees, and community will be notified of the outbreak and closures in a timely manner.

C. Response.

1. Closure of building(s), building floors(s) and department(s) will be determined on a case-by-case basis. When a closure is issued, employees are not allowed in the closed areas unless written permission from a Unit Director, CFO, or Branch Manager.
2. Length of closure will be for a minimum of seven calendar days.
3. Deep cleaning after closure – a deep cleaning of the affected areas must be done before employees are allowed back into the offices. Deep cleaning may not commence until a minimum of 2 hours after closure. No one is allowed back into the affected for a minimum for 2 hours after deep cleaning.
4. The LTBB Health Department will conduct contact tracing for COVID positive employees.
5. Department/Program services will continue electronically.
6. Employees will telework from home if their position allows. If an employee is mandated to go home due to an outbreak closure and their position does not permit telework, the employee will be on paid administrative leave.
7. Some departments will not be closed down entirely due to the nature of their work. Examples include health, law enforcement, conservation, regulatory, and facilities.

III. COVID-19 Employee Response Plan.

A. Identification of a COVID positive employee. The Tribal government shall respond swiftly but carefully if an employee tests positive for COVID.

- 1) A positive test result will be accepted from an unexpired home test. Pictures of the test with expiration date visible and test result must be provided to the supervisor for verification of authenticity. OR
- 2) A positive result will be accepted from a nucleic acid/PCR test done at a medical facility/testing site.

B. Contact Tracing. The Health Department, in coordination with other governmental departments, shall develop a workforce contact tracing protocol to identify and inform

any individuals who have been in close contact with a COVID positive employee. For COVID-19, a close contact is within 6 feet of someone for a cumulative total of 15 minutes or more over a 24-hour period with or without a mask

- C. Notification.** Employees testing positive must inform their supervisor immediately, for the safety of LTBB Government employees and guests. Upon learning that an employee may be COVID positive, the employee's supervisor shall be required to contact their direct supervisor, the HR Director, the Health Director, and their Unit Director, CFO, or Branch Manager. Employee should also contact their health care provider.
- D. Response.** The government office/building where a COVID positive employee was working will be shut down and closed to employees and the public until the office/building can be deep cleaned and decontaminated.
- E. Employee Quarantine Following Positive Test.**
 - 1. Employees who have tested positive for COVID, may return to work in the buildings if the following is met:
 - a. 10 days from positive test, with one negative nucleic acid/PCR test done at a medical facility/testing site, or 14 days from the positive test, with no follow up test, AND
 - b. No fever for 24 hours without treatment, AND
 - c. Other symptoms are improving (no smell and no taste may last longer)
 - d. Home COVID tests are not allowed for returning to work.
 - 2. Employees who are able and willing to work remotely during quarantine may do so with approval of the Director and Unit Director. Employees who are unable to work remotely, will be required to use PTO until quarantine period is over.
- F. Employee Close Contact Exposure.** If an employee has been directly contacted by a local Health Department because they have a known COVID exposure from being in close contact with a COVID positive person, or if an employee knows they have been in close contact with a COVID positive person, they are required to let their supervisor know right away about the exposure, when it occurred, and whether they were in the office or in contact with other employees during working hours following the close contact exposure. For COVID-19, a close contact is within 6 feet of someone for a cumulative total of 15 minutes or more over a 24-hour period with or without a mask.
- G. Employees Having Close Contact with COVID Positive Person:**
 - 1) **Unvaccinated:** Employees who have had close contact with a COVID positive person are required to:
 - a. Quarantine for a minimum of seven (7) days and test to return to work. Employee can work remotely during quarantine or if remote work is not available, then employee must use PTO to cover the seven (7) days, unless employee has an approved medical/religious exemption from vaccination.
 - i. If no symptoms develop within the seven (7) days, employee will be tested at a medical facility/testing site with a nucleic acid/PCR test. Employee can return to work upon showing proof of negative test.
 - ii. If symptoms develop within the seven (7) days, employee must stay home and test at 3-5 days after symptoms develop.
 - 1. Positive test results: An unexpired, verified home test is acceptable if test is positive.

- a. If employee test is positive, employee must notify their supervisor of the results immediately.
 - b. Employees who have tested positive for COVID, may return to work in the buildings if the following is met:
 - i. 10 days from positive test, with one negative nucleic acid/PCR test done at a medical facility/testing site, or 14 days from the positive test, with no follow up test, AND
 - ii. No fever for 24 hours without treatment, AND
 - iii. Other symptoms are improving (no smell and no taste may last longer)
 - 2. Negative test results: Negative test must be a nucleic acid/PCR test performed at a medical facility/test site. A negative unexpired home test is not acceptable. Employee can return to work upon showing proof of negative test and symptoms resolve.
 - 3. Employee is ill, employee uses PTO to cover the time off from work if remote work is not available.
- b. OR Quarantine for 10 days and return to work on day 11 if no symptoms. Employee must use PTO to cover time off work. If employee has an approved medical/religious exemption from vaccination and doesn't choose to get tested, they must use PTO to cover days 8-10 of the quarantine. If symptoms develop, follow protocol in G.1.a.ii above.
- 2) **Vaccinated:** Employees who have had close contact with a COVID positive person are required to:
- a. Quarantine at home for four days. Employee can work remotely during quarantine or if remote work is not available, then employee will be paid administrative leave.
 - i. If no symptoms develop within the four (4) days, employee will be tested at a medical facility/testing site with a nucleic acid/PCR test. Employee can return to work upon showing proof of negative test.
 - ii. If symptoms develop within the four (4) days, employee must stay home and test at 3-5 days after symptoms develop.
 - 1. Positive test results: An unexpired, verified home test is acceptable if test is positive.
 - a. If employee test is positive, employee must notify their supervisor of the results immediately.
 - b. Employees who have tested positive for COVID, may return to work in the buildings if the following is met:
 - i. 10 days from positive test, with one negative nucleic acid/PCR test done at a medical facility/testing site, or 14 days from the positive test, with no follow up test, AND
 - ii. No fever for 24 hours without treatment, AND

- iii. Other symptoms are improving (no smell and no taste may last longer)
 - 2. Negative test results: Negative test must be a nucleic acid/PCR test performed at a medical facility/test site. Employee can return to work upon showing proof of negative test and symptoms resolve. A negative unexpired home test is not acceptable.
 - 3. Employee is ill, employee uses PTO to cover the time off from work if remote work is not possible.
 - b. OR Quarantine for 10 days and return to work on day 11 if no symptoms. Paid administrative leave will be used to cover quarantine days. If symptoms develop, follow protocol in step G. 2. a. ii. above.
- 3) **Medical/Religious Exemption:** An employee may request, based on a sincerely-held religious belief or a documented medical condition, to remain unvaccinated, receive only a specific brand of the COVID-19 vaccine, or wait for an alternative version of the vaccine to become available. Employees should make an exemption request to the Human Resources Department.

IV. Closure and Phase History Summary.

A. Government Office Closure (March 16, 2020 to May 17, 2020)

- 1. Government buildings were closed to the public.
- 2. Services were available electronically or by appointment.
- 3. Employees who were able worked remotely.

B. Phase I Reopening (May 18, 2020 to June 27, 2020)

- 1. Government buildings remained closed to the public.
- 2. Services to the public continue to be available electronically or by appointment only.
- 3. Employees who are able to work remotely are required to.
- 4. Office hours will be Monday thru Friday from 8:30 a.m. to 5:00 p.m.
- 5. Employee travel was cancelled.
- 6. In person events were not allowed.
- 7. In person meetings were not allowed.
- 8. Mandatory temperature checks and health questionnaire for employees working in the buildings.
- 9. Employees were required to practice social distancing, hand wash/hand sanitize, wear masks, and help with cleaning offices daily.
- 10. All buildings were cleaned daily and deep cleaned weekly.
- 11. Employees were to maintain a minimum of one (1) parking spot between vehicles at all times.

C. Phase II (June 28, 2020 to May 29, 2021)

- 1. Government buildings were open to citizens needing to conduct business by appointment only.

2. Services to the public continued to be available electronically or in-person by appointment only. Citizens were encouraged to continue to conduct business by electronic means whenever possible.
3. Employees able to work remotely from home were encouraged to do so.
4. Office capacity of staff was not to exceed 50% for most of Phase II. A portion of Phase II office capacity was less than 50%.
5. Office hours continue to be Monday thru Friday from 8:30 a.m. to 5:00 p.m.
6. Employee travel was cancelled unless approved by Unit Director, Branch Manager, or CFO.
7. In person events and meetings were suspended unless approved by Unit Director, Branch Manager, or CFO. An approved safety plan, social distancing, and PPE were required.
8. Mandatory temperature checks and health questionnaire continued for employees working in the buildings.
9. Employees were encouraged to get the COVID-19 vaccination.
10. COVID-19 Leave Programs were available for employees to utilize.
11. Workplace safety plan was implemented for all employees regarding COVID-19 exposures, positive tests, quarantine, contact tracing, and notification.
12. On 1/20/2021, a Health Amendment was implemented for Health Department Employees exposure and quarantine. Supplemental amendment updates continued as needed.
13. Employees were required to practice social distancing, hand wash/hand sanitize, wear masks, and help with cleaning offices daily.
14. All buildings were cleaned daily and deep cleaned weekly.
15. At the end of Phase II, masks were no longer mandatory for vaccinated employees.

D. Phase III (May 30, 2021 – July 03, 2021)

1. Government buildings were open to citizens and guests needing to conduct business.
2. Services to the public were available in-person or electronically. Citizens were encouraged to continue to conduct business by electronic means whenever possible.
3. Teleworking for employees continued to be available on a case-by-case basis.
4. Office staffing level was to be between 50% and 75%.
5. Office hours continue to be Monday thru Friday from 8:30 a.m. to 5:00 p.m.
6. Employee travel was cancelled unless approved by Unit Director, Branch Manager, or CFO.
7. In person events and meetings were permitted on a limited basis. An approved safety plan, social distancing, and PPE were required. Meetings up to 25% were allowable without a safety plan. Outdoor events capacity limit was 300 people.
8. Mandatory temperature checks and health questionnaire continued for employees working in the buildings.
9. Employees were encouraged to get the COVID-19 vaccination.
10. COVID-19 Leave Programs were available for employees to utilize.

11. Workplace safety plan was implemented for all employees regarding COVID-19 exposures, positive tests, quarantine, contact tracing, and notification.
12. A formal Health Amendment was implemented for Health Department Employees exposure and quarantine. Supplemental amendment updates continued as needed.
13. Employees and guests were required to practice social distancing and hand wash/hand sanitize while in the buildings. Masks were no longer mandatory for vaccinated employees and guests.
14. All buildings were cleaned daily and deep cleaned weekly.

E. Phase IV (September 19, 2021 – September 27, 2021)

1. Government buildings were open to citizens and guests needing to conduct
2. business.
3. Services to the public were available in-person or electronically. Citizens were
4. encouraged to continue to conduct business by electronic means whenever possible.
5. Teleworking for employees was allowed for some positions. Telework was on a
6. case-by-case basis.
7. Office staffing level was to be at 100% unless approved otherwise.
8. Office hours were Monday thru Friday from 8:15 a.m. to 5:00 p.m.
9. Employee travel was allowed within the State of Michigan. Out of state business travel was only permitted if preapproved by Unit Director or CFO, and Chair/Vice-Chair.
10. In person events and meetings were permitted on a limited basis. An approved safety plan, social distancing, and PPE were required. Meetings were allowed with a capacity of five (5) people. Outdoor events capacity limit was 100 people.
11. Mandatory temperature checks and health questionnaire continued for employees working in the buildings.
12. Employees were encouraged to get the COVID-19 vaccination.
13. Regular leave programs outlined in the employee handbook were available for employees to utilize.
14. Workplace safety plan was implemented for all employees regarding COVID-19 exposures, positive tests, quarantine, contact tracing, and notification.
15. Employees and guests were required to practice social distancing and hand wash/hand sanitize while in the buildings. Masks were mandatory for all employees and guests in the buildings.
16. 14. All buildings were cleaned daily and deep cleaned weekly.

F. Phase 3.5 (September 28, 2021 – November 17, 2021)

1. Government buildings were open to citizens and guests needing to conduct business.
2. Services to the public were available in-person or electronically. Citizens were encouraged to continue to conduct business by electronic means whenever possible.

- 3.** Teleworking for employees was allowed for some positions. Telework was on a case-by-case basis.
- 4.** Office staffing level was to be between 50% and 75%.
- 5.** Office hours were Monday thru Friday from 8:15 a.m. to 5:00 p.m.
- 6.** Employee travel was cancelled unless approved by Unit Director, Branch Manager, or CFO.
- 7.** In person meetings were permitted with a capacity of five (5) people. Workplace safety precautions had to be followed.
- 8.** Indoor/Outdoor events were prohibited unless approved by Director and by the Unit Director, CFO, or Branch Manager. An approved safety plan, social distancing, and PPE were required.
- 9.** Mandatory temperature checks and health questionnaire continued for employees working in the buildings.
- 10.** Employees were encouraged to get the COVID-19 vaccination.
- 11.** Regular leave programs outlined in the employee handbook were available for employees to utilize.
- 12.** Workplace safety plan was adjusted and implemented for all employees regarding COVID-19 exposures, workplace outbreaks, positive tests, quarantine, contact tracing, and notification.
- 13.** Two formal amendments were developed and implemented during Phase 3.5.
 - a.** Workplace Outbreak Amendment: defined outbreak in the workplace for government operation employees and set the safety action plan for government operations.
 - b.** Home Test Amendment: allowed employees the use of home tests for COVID-19 testing. Home tests were valid for positive tests but a test administered by a health facility by a health worker was needed to verify a negative test.
- 13.** Employees and guests were required to practice social distancing and hand wash/hand sanitize while in the buildings. Masks were mandatory for all employees and guests in the buildings.
- 14.** All buildings were cleaned daily and deep cleaned weekly.