


Category:	Workplace	INCA Community Services Personnel Policy 
Sub Category:	Health and Safety	
Effective Date:	4/6/20	
End Date:	12/20	
Forms:	EPSL Form, FMLA, Health Survey, Travel Form,	
Responsible:	Program Directors, Human Resource Manager, Executive Director, Management Staff	

COVID-19 Emergency Policy and Procedure

Purpose

On January 31, 2020, Health and Human Services Secretary Alex M. Azar II declared a public health emergency (PHE) for the United States to aid the nation's healthcare community in responding to COVID-19. On March 11, 2020 WHO publicly characterized COVID-19 as a pandemic. On March 13, 2020 the President of the United States declared the COVID-19 outbreak a national emergency. The purpose of this policy is in direct reflection of these issues.

Policy

This policy includes the measures the agency is actively taking to mitigate the spread of COVID-19. Employees are required to follow all the rules within this policy diligently in order to sustain a healthy and safe workplace in this unique environment. It's important all employees respond responsibly and transparently to these health precautions. All private health and personal data is treated with high confidentiality and sensitivity.

COVID-19 Policy is susceptible to changes with the introduction of additional governmental guidelines. If so, INCA will provide updates to all employees as soon as possible by email, text, direct contact, or link on the agency website (incacaa.org/covid19).

COVID-19 Health Survey

Employees will be surveyed on Monday, Wednesday, and Friday each week to determine if they are eligible to work. The survey should be completed by every employee entering the office and taken by a designated person in the facility. Employees who have contributed in or display the following actions should be self-quarantined for 14 days and unable to return to work:

- Have had a fever (100.4 F or higher) in the past 72 hours.
- Have had signs or symptoms of a respiratory infection such as a cough, shortness of breath, or a sore throat.
- Have been in contact with someone with a confirmed diagnosis of COVID-19 within the last 14 days.
- Have traveled internationally or to countries with widespread sustained COVID-19 within the last 14 days.
- Have traveled in the past 5 days to a county outside of the area you reside with a confirmed case of COVID-19.
- Have been at an event with a group of more than 10 people in the last 3 days.

Employees who are unable to return to work for a period of 14 days will again be surveyed at the end of their 14 day quarantine. If they answer yes to any of the questions and a threat of possible infection appears they will not be allowed to work.

If the employees answer is yes to the first two questions the employee will be sent home to self-quarantine immediately. Appropriate COVID-19 leave will be used. If it is determined that the potential of exposure is strong on the answers to the last four questions the employee will be sent home to self-quarantine immediately. Employees will be allowed to use appropriate COVID-19 leave.

Employees will be informed about the COVID-19 Emergency Paid Sick Leave and if they qualify will be allowed to use it starting April 1, 2020. The EPSL will be used first before any other leave if they have a qualifying factor.

Each determination will be made on a case by case basis. If employees can justify their travel with good cause and show they have not had a possible contact with someone with COVID-19 they can continue working.

Emergency Paid Sick Leave

Under the FFCRA, beginning April 1, 2020 an employee qualifies for paid sick time if the employee is unable to work (or unable to telework) due to a need for leave because:

1. The employee is subject to a Federal, State, or local quarantine or isolation order related to COVID-19;
2. The employee has been advised by a health care provider to self-quarantine related to COVID-19;
3. The employee is experiencing COVID-19 symptoms and is seeking a medical diagnosis;
4. The employee is caring for an individual subject to an order described in (1) or self-quarantine as described in (2);
5. The employee is caring for a child whose school or place of care is closed (or child care provider is unavailable) for reasons related to COVID-19; or
6. The employee is experiencing any other substantially-similar condition specified by the Secretary of Health and Human Services, in consultation with the Secretaries of Labor and Treasury.

Eligible Employees:

All employees of covered employers are eligible for two weeks of paid sick time for specified reasons related to COVID-19.

Duration of Leave:

For reasons (1)-(4) and (6): A full-time employee is eligible for 80 hours of leave, and a part-time employee is eligible for the number of hours of leave that the employee works on average over a two-week period.

For reason (5): A full-time employee is eligible for up to 12 weeks of leave (two weeks of paid sick leave followed by up to 10 weeks of paid expanded family & medical leave) at 40 hours a week, and a part-time employee is eligible for leave for the number of hours that the employee is normally scheduled to work over that period.

Emergency paid sick leave expires on December 31, 2020 and cannot be carried over.

Calculation of Pay:

For leave reasons (1), (2), or (3): employees taking leave are entitled to pay at either their regular rate or the applicable minimum wage, whichever is higher, up to \$511 per day and \$5,110 in the aggregate (over a 2-week period).

For leave reasons (4) or (6): employees taking leave are entitled to pay at 2/3 their regular rate or 2/3 the applicable minimum wage, whichever is higher, up to \$200 per day and \$2,000 in the aggregate (over a 2-week period).

For leave reason (5): employees taking leave are entitled to pay at 2/3 their regular rate or 2/3 the applicable minimum wage, whichever is higher, up to \$200 per day and \$12,000 in the aggregate (over a 12-week period).

Paid Family Medical Leave Act

Up to an additional 10 weeks of paid expanded family and medical leave at two-thirds the employee's regular rate of pay where an employee, who has been employed for at least 30 calendar days, is unable to work due to a bona fide need for leave to care for a child whose school or child care provider is closed or unavailable for reasons related to COVID-19.

See COVID-19 Expanded FMLA Policy.

Administrative Leave (See administrative leave policy)

The COVID-19 pandemic would be categorized as "Unusual or extenuating situations" under our administrative leave policy. All employees could be eligible for administrative leave. Exceptions will be when program funds are not available, payment of funds would jeopardize the stability of the program or agency, or funders guidance do not allow for the employee position held.

If an employee qualifies for Emergency Paid Sick Leave or Expanded FMLA it must be used first before administrative leave. I

Each employee's ability to work will be considered on an individual basis. All employees will follow the work schedule and duties they have been assigned during this time of emergency to qualify for administrative leave. The following guidelines will be followed:

Essential Employee: an employee that performs work involving the safety of human life or protection of property. Flexible work-schedules will be used to avoid unnecessary contact. All safety procedures, safety equipment and social distancing will be observed while on duty. Duties will be limited to only those necessary to insure the health and safety of staff and the members of our communities. If possible, employees will be allowed to telework. Full-time, non-exempt employees will be paid 40 hour a week. Part-Time employees will be paid 25 hours a week using admin leave for hours unable to work. If overtime is worked, employees will be paid as per DOL guidelines.

Non-Essential Employee: an employee whose presence at work during an emergency is not required to assist in meeting operational needs. If possible, employees will telework (work remotely). If not, employees will utilize Emergency Paid Leave or Extended FMLA Leave if they have a qualifying reason. Upon exhaustion of this leave and upon approval of the Executive Director employees may utilize administrative leave.

To receive this pay, all employees will be required to communicate on a regular basis with their supervisor and complete the EWS timesheet on a daily basis. If they are working remotely they will indicate their hours and duties performed in the description box.

Essential Employee Authorization to Travel

Employees will receive an authorization to travel form that they must carry at all times to travel to and from work in the event the county they are working or living in becomes classified as a "Stay at Home" restriction deemed necessary by the Governor of Oklahoma.

Employees who are classified as essential include the following:

- Transportation and Logistic
- Community Based Workers
- Financial Services
- Communications and Information Technology
- Administrative

Assistance with Clients On-Site Policy

- Front doors will be locked.
- A sign will be placed on the front door that states only one service recipient at a time will be allowed in the restricted lobby area and to please wait outside for their turn using social distancing. A telephone number will be listed on the sign for individuals to call for service.
- Service recipients are not allowed to pass the restricted lobby area. In Tishomingo, Marshall, and Murray the glass to receptionist area must remain closed. In Atoka, an enclosed area by the front door will be arranged.
- Paperwork that does not have to have a signature can be completed over the phone with the clients.
- If paperwork is completed over the phone, clients will be given a time they can pick up the service they were needing such as food banks, medical equipment, etc.
- Clients will call when they arrive so their supplies can be placed in the restricted area or outside of the doorway for pick up.
- All paperwork including that which requires signatures will be put into a designated area and left for at least one day before touching to enter into the tracking system and then gloves need to worn at all times while handling all paperwork.
- If service recipient does not have a cell phone:
 - A staff person will go to the locked glass door and request what is their purpose of the visit
 - The staff person will then place the appropriate paperwork on the table and instruct the individual to complete outside, in their vehicle, or take home and complete. Ask them to wait until you step behind the table to enter.
 - A staff member shall give them instructions through the door or by observing social distancing.
 - Upon completion of paperwork and return of the client, a staff person will verify through the closed glass window or at a social distance the client who is signing the paper(s) and once the client(s) has stepped far enough away, goes and retrieves the papers with gloves on.
 - The designated staff does the rest of the work in her office with the client outside.
- Staff should record the conversation date and time in the notes section of the paperwork and write COVID-19 in the details. Staff should record the time of pickup as well.
- Restricted lobby area will be wiped down after each client exiting, including door handles on both sides.
- Staff will be required to wear gloves while touching any paperwork passed from clients. Dispose of gloves after each time paperwork is touched.

Contractors, Service Personnel, and Deliveries

Contractors and service personnel are essential to the operations of the agency. When needed they will be contacted to perform services. All contractors coming from areas in which COVID-19 cases are confirmed or having been in areas with confirmed cases should adhere to the following:

- Notification of work must be given 24 hours in advance to the personnel scheduling the work to be done.

- If work can be done after hours it must be. Keys can be given to contractors by the designated staff person on site in each of the counties.
- If work cannot be done while there is no staff in the building the following guidelines must be adhered to at all times:
 - Must practice social distancing.
 - Wash hands and use hand sanitizer regularly throughout the duration of their service.
 - Do not come in contact with any staff.
 - Communicate by telephone or at appropriate social distancing designated personnel.
 - Clean areas they have touched thoroughly before leaving.

Staff members who are responsible for the contact should ensure the office or area they worked in is cleaned and sanitized after their departure. All staff should adhere to all rules set forth for any type of contact with people during this pandemic.

Deliveries should be handled outside the agency doors. No delivery person should enter the building. All boxes should be left outside the front door, the driver must knock on the doors, use the bells, or call the office for a staff member to come to the door and give their name. If they require a signature use best cleaning practices before handling pens pads.

Electronic Signature

An electronic signature is a paperless method used to authorize or approve documents which indicates that a person adopts or agrees to the meaning or content of the document. During the pandemic electronic signatures may take the place of actual signatures on all documentation throughout the agency unless otherwise specified by a grantee or funder.

Receiving Report Procedures

Receiving reports should be done in accordance with the policies already set in place. To expedite the process of signed receiving reports the following procedures should be followed:

- An email detailing the expenditures must be sent to the program director. The following information must be included:
 - Date of purchase
 - Line Item
 - Program Paid From
 - Products purchased
 - Total Amount of Purchases
 - Details explaining what was purchased and for what reason
 - Attach the receiving report, the invoice, and the purchase request to the email
- Program Directors will review the purchases and approve by sending an approval email to the Executive Director, who will then approve and send to the bookkeeping department.
- Save all receiving reports to be sent over to bookkeeping at a later date.
- If unable to scan and attach the receiving report and invoice in a timely manner, pay the bill, send the receiving report information, and contact Bookkeeping.

Communications

All messaging being communicated both internally and externally should be clear, concise, informative, transparent and keep safety & well-being front and center. Primary communication should originate from the Capacity Director and/or Crisis Communication Team to ensure consistency and validity of

information. Communication is of the utmost importance and information should be disseminated to Staff, Community Members, Clients, Policy Makers, and Donors on a regular basis.

Crisis Communication Team

Capacity Director, Executive Director, Operations Director, HR Manager with input from program directors.

Internal Messaging

Internal messaging should focus on pertinent agency/program information, including agency information: office closures, availability of services, shifts in hours, how to keep updated, HR information, telecommuting policy, sick leave, mental health/self-care resources, compliance with local restrictions, and public health information. All communication to INCA staff, upon approval from leadership, should be administered by the Capacity Director and/or Crisis Communication Team through Constant Contact email marketing tool for consistency and validity. Program directors should advise staff that all official statements and updates will be shared in this manner. Staff can also be directed to incacaa.org/covid19 for updates.

External Messaging

External messaging should focus on pertinent agency/program information, including office/program closures, availability of services, mental health/self-care resources, compliance with local restrictions, how to help, how to make donations, and public health information. All approved communication to the public should be administered by the Capacity Director and/or Crisis Communication Team through social media channels(see social media guidelines below), INCA's website, and email marketing as necessary. The Capacity Director should work with leadership staff to develop a contact list from each program and community to ensure partners and stakeholders are kept abreast to any updates about INCA, including other service organizations, policy makers, and community members. External communication should be frequent and updated on a regular basis to reflect the latest information pertinent to the community and customers. INCA is a trusted source of information and consistency and accuracy of content is extremely important. Branding guidelines for all original content still apply to all Crisis and COVID-19 related communication. Staff are encouraged to share content from INCA's official social media channels and website.

Positive Messaging/Staff Participation

Staff are encouraged to send pictures, videos, stories, and other content about the work they are doing in their community, or pertinent to their community to the Capacity Director for use online. It is important to keep both staff and community morale positive during a crisis and sharing our positive impact is crucial to our mission and the situation.

Social Media Guidelines

Social media content is primarily distributed by the Capacity Director but shared content can be administered by specific staff as assigned. The following are guidelines for social media outlets:

- Facebook/Twitter/Instagram - INCA Community Services Inc.
 - Leadership staff is responsible for posting on the page with the Capacity Director's oversight of the page.
 - All original content should be consistent with INCA and Community Action's branding, including messaging, hashtags, logos, and colors.
 - All original content/graphics should be posted on the INCA's page, to establish community rapport and validity, and subsequently shared on other pages and groups.

- All staff are encouraged to share content related to the page, confidentiality of all program participants must be maintained at all times.
- Expressed content that is not in the best interest of the agency is to be refrained from at all times when it is in direct relation to the pages of the agency.
- Facebook - Head Start
 - Facebook groups will be assigned to each classroom by the Capacity Director, through INCA Head Start's official Facebook page.
 - Groups should be the basis of an online classroom and should contain information that is pertinent to the age group of the students and should be relatively related to a learning mechanism that will enhance learning by students.
- Facebook - JAMM Transit
 - The Transit Operations Director is responsible for the content on the Facebook Page.
 - Employees are encouraged to share content posted on the JAMM Transit - INCA Community Services, Inc. Facebook page.
 - Employees are encouraged to refrain from negative content about passengers, drivers, or staff members to avoid creating negative content.
- Facebook - RAVE
 - The RAVE Director is responsible for the content on the Facebook page.
 - Staff is encouraged to share content from the page but confidentiality of all clients and program participants must be adhered to at all times.
- Facebook - RSVP
 - The RSVP Director is responsible for the content on the page.
 - Volunteers and staff are encouraged to share content on the page but to maintain privacy of anyone who is in direct relation to the program unless otherwise stated.
- Facebook - General
 - All staff are encouraged to share the social media content displayed across the pages but to remember the code of conduct as an agency.
 - The agency will continue to post updates, share information, and give guidance to the community members as made available.

Cleaning Steps

- Stay home when you are sick.
- Wash your hands frequently with warm, soapy water for at least 20 seconds.
- Cover your mouth with tissues whenever you sneeze, and discard used tissues in the trash.
- Avoid people who are sick with respiratory symptoms.
- Clean frequently touched surfaces.
- Routinely clean all frequently touched surfaces in the workplace, such as workstations, countertops, and doorknobs. Use the cleaning agents that are usually used in these areas and follow the directions on the label.
- Vehicles and areas where outside personnel are coming in contact with need to be cleaned every 2 to 3 hours each day with disinfectant

Additional Safety Measures

- JAMM Transit will not collect cash fares during this pandemic.
- Head Start will provide distance learning for all students.
- Clothing banks will be closed during the state of emergency as declared by the governor.
- Rotating essential staff schedules to minimize exposure.

Dissemination of Policy

The policy will be made available to all employees through the agency's website. The agency will educate and train employees and supervisors regarding the policy and any conduct that could constitute a violation of the policy.