



COVID-19 Preparedness & Response Plan

GENERAL

The following COVID-19 Preparedness & Response Plan has been established for Cueter Chrysler Jeep Dodge Ram of Lansing (the “Dealership”) in accordance with the requirements in the Michigan Occupational Safety and Health Administration Emergency Rules for COVID-19 and the latest guidance from the US Centers for Disease Control and Prevention (CDC). The purpose of this plan is to minimize or eliminate employee exposure to SARS-CoV-2 (“COVID-19”).

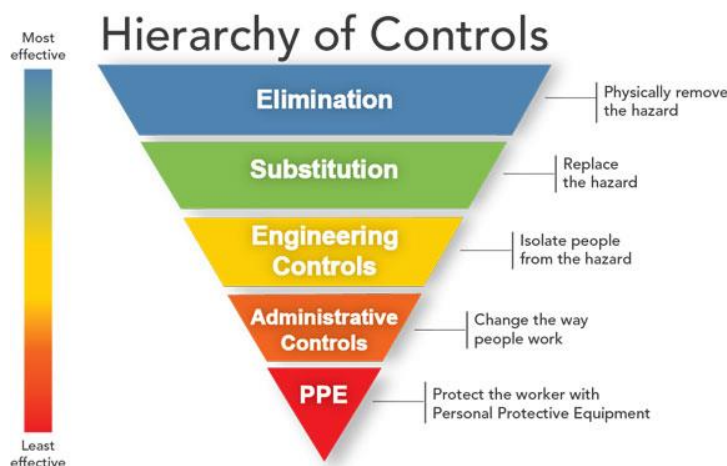
As the COVID-19 situation evolves, the EOs and CDC guidance are periodically updated. Steve Demers will be responsible for visiting the EO webpage and CDC guidance webpage regularly (for example, weekly) for the latest information and for revising the plan as necessary.

The Dealership has designated one or more worksites supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The name(s) of the supervisor(s) is/are Steve Demers. The supervisor will remain on-site at all times when employees are present on site. An on-site employee may be designated to perform the supervisory role.

The plan will be made readily available to employees and labor unions. The plan will be made available via Internal posting in all break rooms and/or each check in station located at department entrances.

Controlling exposures to occupational hazards is the fundamental method of protecting workers. Traditionally, a hierarchy of controls has been used as a means of determining how to implement feasible and effective control solutions.

One representation of this hierarchy is as follows:



<https://www.cdc.gov/niosh/topics/hierarchy/default.html>

ELIMINATION AND SUBSTITUTION CONTROLS

In a dealership setting, elimination of the hazard, COVID-19, is difficult to achieve; however, the Dealership has implemented feasible elimination and substitution controls. Elimination controls involve completely eliminating employee exposure to the hazard and substitution means replacing the hazard with a non-hazardous method or device. The following elimination and substitution controls have been implemented:

ELIMINATION CONTROL
Permit remote work when feasible or when the virus risk is high in the geographic area of the Dealership
Require employees to stay home when feeling ill and establish flexible policies to permit leave time as appropriate
Require isolation of customers and employees exhibiting symptoms
Restrict the number of employees and customers in the dealership
Restrict access to employee areas and customer waiting areas
Encourage customers to use credit cards instead of cash
Encourage customers to use curbside service or home delivery

ENGINEERING CONTROLS

The Dealership has implemented feasible engineering controls to minimize or eliminate employee exposure to COVID-19. Engineering controls involve isolating employees from work-related hazards using ventilation and other engineered solutions. In workplaces where they are appropriate, these types of controls reduce exposure to hazards without relying on worker behavior and can be the most cost-effective solution to implement.

Engineering controls can include:

- Installing physical barriers (such as clear plastic sneeze guards) between coworkers or between workers and customers.
- Implementing touchless payment for customers and encouraging curbside service for customers.
- Increasing the amount of ventilation in the building.
- Increasing the amount of fresh outdoor air that is introduced into the building.

Steve Demers will be responsible for seeing that the correct engineering controls are chosen, installed, maintained for effectiveness, and serviced when necessary.

The following engineering controls have been implemented:

ENGINEERING CONTROL
Install sneeze guards or other physical barriers
Increase ventilation in work areas by opening windows and doors
Rearrange customer waiting areas to reduce seating capacity
Remove food and drink serving stations and complimentary items
Reduce entry and exit points to be used by customers and employees
Rearrange of employee break rooms to remove tables and chairs to reduce capacity
Email customer documents, repair orders where feasible instead of providing hard copies
Clean break/lunchroom and bathroom areas frequently. Employees performing cleaning will be issued proper personal protective equipment such as nitrile, latex, or vinyl gloves and gowns, as recommended by the CDC
Disinfect vehicles when a vehicle is brought in for service, when it is returned to a customer, when a vehicle is taken from inventory for a test drive, and when a used vehicle is taken into the dealership as a trade or from auction. Focus on "high touch areas" including seat belt components, handles, drive shaft, visors and the gas cap
Utilize steering wheel, seat, gear shift, and floor mat covers in vehicles
All employees involved in touching customers' vehicles must use rubber gloves and change them frequently and must change or wash gloves before working on a different vehicle
If a vehicle may have been exposed to someone with COVID-19 do not touch it for 24 hours, then disinfect it.
Routine cleaning and disinfecting all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, and doorknobs
Wipe down the exterior door handles before opening vehicles

ADMINISTRATIVE CONTROLS

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. Steve Demers will be responsible for seeing that the correct administrative controls are chosen, implemented and maintained for effectiveness. The following administrative controls have been established for the Dealership and will be implemented as applicable:

Job/Task	Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)
All employees	Maintain at least six feet from everyone on the worksite if not fully vaccinated.
All employees	Use ground markings, signs, and physical barriers to prompt unvaccinated employees to remain six feet from others and to notify employees and customer of any face covering requirements.
All employees	Promote remote work (telecommuting) to the fullest extent possible for those employees who are not fully vaccinated.
All employees	Restrict face-to-face meetings if not vaccinated. Communicate with others through phone, email, teleconferencing, and web conferencing.
All employees	Restrict the number of customers in the dealership at any given time.
All employees	Provide unvaccinated employees with non-medical grade face coverings (cloth face coverings).
All employees	Require unvaccinated employees to wear cloth face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.
All employees	Require unvaccinated customers and the public to wear cloth face coverings.
All employees	Keep customers informed about symptoms of COVID-19 and ask sick customers to stay at home until healthy again. Encourage sick customers to use drive-through services, curbside pickup, or home delivery.
All employees	Provide customers and the public with tissues and trash receptacles.
All employees	Encourage customers to place orders for vehicles, parts or services through the phone or web.
All employees	Promote curbside and home delivery to minimize contact with customers.
All employees	Encourage proper cough and sneeze etiquette by employees, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands.
All employees	Ensure that sick leave policies are flexible and consistent with public health guidance, so employees do not go to work sick.
All employees	Maintain flexible policies that permit employees to stay home to care for a sick family member.
All employees	Stagger employee breaks and lunches, if practicable, to reduce the size of any group at any one time to less than ten (10) people
All employees	Minimize or eliminate ridesharing. While in vehicles, employees must ensure adequate ventilation.

HAND HYGIENE

Steve Demers will be responsible for seeing that adequate handwashing facilities are available in the Dealership and that regular handwashing is required. Frequency of such handwashing will be determined in part by factors such as when and how often the employees' hands are potentially exposed to COVID-19. When handwashing facilities are not available, the Dealership shall provide employees with antiseptic hand sanitizers or towelettes. The Dealership will provide time for employees to wash hands frequently and to use hand sanitizer.

The Dealership shall promote frequent and thorough hand washing, including by providing employees, customers, and worksite visitors with a place to wash their hands. If soap and running water are not immediately available, the Dealership shall provide antiseptic hand sanitizers or alcohol-based hand towelettes containing at least 60 percent alcohol.

DISINFECTION OF ENVIRONMENTAL SURFACES

The Dealership will increase facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (for example, door handles), paying special attention to parts, products, and shared equipment (for example tools, machinery, office equipment such as copiers, telephones, fax machines, and vehicles). The Dealership will make cleaning supplies available to employees upon entry and at the worksite.

Steve Demers will be responsible for seeing that environmental surface in the workplace are cleaned and disinfected. Frequency of such disinfection will be determined in part by factors such as when and how often the environmental surfaces are potentially exposed to COVID-19. When choosing cleaning chemicals, the Dealership will consult information on Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens. Products with EPA-approved emerging viral pathogens claims are expected to be effective against COVID-19 based on data for harder to kill viruses. The manufacturer’s instructions for use of all cleaning and disinfection products will be strictly adhered to.

The following is a list of environmental surfaces, methods used to disinfect, and the frequency of such disinfection:

Surface	Method/Disinfectant Used	Schedule/Frequency
Doors/shared eqpt	Alcohol 70% spray and wipe	Every hour
Sales and service desks	Alcohol 70% spray and wipe	After each use
Bathroom touch points	Alcohol 70% spray and wipe	Every hour
Sales and Service Vehicles	Interior Vaporizer Ethanol 80%	After each use

The Dealership will perform enhanced cleaning and disinfection after persons confirmed to have COVID-19 have been in a work area. In the interim, that work area will be temporarily closed, and employees will be sent home or relocated. Steve Demers will be responsible for seeing that this protocol is followed.

The following methods will be used for enhanced cleaning and disinfection:

- Close off areas used by the person who is sick.
- Open outside doors and windows to increase air circulation in the area.
- Wait 24 hours before cleaning or disinfecting. If 24 hours is not feasible, wait as long as possible.
- Clean and disinfect all areas used by the person who is sick, such as offices, bathrooms, common areas, shared electronic equipment like tablets, touch screens, keyboards, remote controls, and ATM machines.

FACE COVERINGS (PPE) FOR EMPLOYEES

The Dealership will provide non-medical grade face coverings (cloth face coverings) to employees. The Dealership will require unvaccinated¹ employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.

The Dealership will require the following:

Job/Task	PPE
All Employees	Require all unvaccinated employees to wear masks when performing in-person work with co-workers and customers
All Employees	Require all unvaccinated employees to wear masks where maintaining 6 feet of distance from another person is not possible
All Employees	Require all unvaccinated employees to wear masks when walking through or

¹ “Fully vaccinated persons” means persons for whom at least 2 weeks have passed after receiving the final dose of an FDA-approved or authorized COVID-19 vaccine. For purposes of this Plan, “unvaccinated” employee shall mean any person who does not fit into the definition of “Fully vaccinated persons.”

	sitting in area near customers or co-workers
All Employees	Instruct employees on proper mask wearing
All Employees	Require employees to wear gloves when cleaning or handling potentially contaminate services or equipment

HEALTH SURVEILLANCE

The Dealership has implemented a screening protocol to identify known or suspected cases of COVID-19 among employees and isolate them from the remainder of the workforce. Steve Demers will be responsible for ensuring that all required health surveillance provisions are performed.

As workers enter the place of employment at the start of each work shift, the Dealership will have employees self-screen for COVID-19. The Dealership will have employees complete or respond to a questionnaire covering the signs and symptoms of COVID-19 and their exposure to people with suspected or confirmed COVID-19. When obtainable, a no-touch thermometer will be used for temperature screening of employees. The Dealership will similarly screen contractors, suppliers, and any other individuals entering the worksite.

Employees have been directed to promptly report any signs and symptoms of COVID-19 to Steve Demers before and during the work shift. The Dealership has provided employees with instructions for how to make such a report to the employer.

The specific instructions for employee reporting are as follows:

Employee with confirmed case of COVID-19

- Immediately contact supervisor
- Leave work immediately or do not report to work (or leave as soon as you report the situation to your supervisor)

Employee suspects he/she is showing symptoms

- Immediately contact supervisor
- Leave work immediately or do not report to work (or leave as soon as you report the situation to your supervisor)

Employee exposed to confirmed or presumptive positive case of COVID-19

- Immediately contact supervisor to determine whether self-isolation is required pursuant to current CDC guidance

The Dealership will physically isolate any employees with known or suspected COVID-19 from the remainder of the workforce, using measures such as, but are not limited to:

- Not allowing known or suspected cases to report to or remain at their work location.
- Sending known or suspected cases to a location (for example, home) where they are self-isolating during their illness.
- Assigning known or suspected cases to work alone at the location where they are self-isolating during their illness.

The Dealership will not discharge, discipline, or otherwise retaliate against employees who stay at home or who leave work when they are at particular risk of infecting others with COVID-19.

When an employee is identified with a confirmed case of COVID-19, **Steve Demers** will notify any co-workers, contractors, or suppliers who may have come into close contact with the person who is the confirmed case of COVID-19, within 24 hours. When notifying coworkers, contractors, and suppliers, the Dealership will not reveal the name or identity of the confirmed case.

The Dealership will allow employees with a confirmed or suspected case of COVID-19 to return to the workplace only after they are no longer infectious according to the latest guidelines from the CDC and the State of Michigan.

Training

Steve Demers shall coordinate COVID-19 training and ensure compliance with all

training requirements. The Dealership will train workers on, at a minimum:

1. Routes by which the virus causing COVID-19 is transmitted from person to person.
2. Distance that the virus can travel in the air, as well as the time it remains viable in the air and on environmental surfaces.
3. Symptoms of COVID-19.
4. Workplace infection-control practices.
5. The proper use of PPE, including the steps for putting it on and taking it off.
6. Steps the worker must take to notify the Dealership of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
7. How to report unsafe working conditions.

Steve Demers shall create a record of the training. The record will list the names of the employees trained, the training date, name of trainer, and content of training.

RECORDKEEPING

The Dealership will maintain the following records as they relate to the COVID-19 preparedness and response plan:

1. Training records.
2. A record of daily entry self-screening results for all unvaccinated employees entering the workplace, including a questionnaire covering signs and symptoms of COVID-19 and exposure to people with suspected or confirmed COVID-19.
3. Records sufficient to verify vaccination status of employees asserting such.
4. When an employee is identified with a confirmed case of COVID-19, record when any co-workers, contractors, or suppliers who may have come into contact with the person who was the confirmed case of COVID-19 were notified.

Steve Demers from employees is maintained confidentially and in compliance with state and federal law. Specifically, medical documentation is stored separate from employees' personnel documentation.

PROPER USE OF FACE COVERINGS AND EXCEPTIONS

For those employees and customers who are not fully vaccinated, the following shall apply:

When wearing the face mask, the mask shall be worn in a manner that follows the below CDC guidelines:

- Place the mask over your mouth and nose.
- Tie it behind your head or use ear loops and make sure it is flush/snug against face.
- Do not touch your mask while wearing it.
- If you accidentally touch your mask, wash or sanitize your hands.
- Remove the mask by untying it or lifting off the ear loops without touching the front of the mask or your face.
- Employees are responsible for regularly washing their face mask with soap and water in the washing machine.

Medical issues that interfere with wearing face coverings:

The Dealership will engage in an interactive process with such employees as required by the Americans with Disabilities Act (ADA). Potential accommodations may include:

- Provision of an alternative face mask or covering/face shield that can be tolerated with the medical condition
- Removal/transfer of employee from customer-facing responsibilities
- Provide employee with unpaid leave until face coverings are no longer required in the workplace
- Accommodate the employee in some other fashion

The Dealership may request additional information including medical documentation from the employee regarding his or her medical condition and restriction against wearing a face mask or covering. Until the issue of wearing a face covering is resolved, the employee may be temporarily sent home or reassigned to a non-customer facing position. Employees who fail or refuse to wear face coverings, but do not have a valid medical or other legally protected objection, will not be permitted to work and shall be disciplined for not following work requirements.

The Dealership will follow all Orders issued by the State of Michigan and its agencies and local municipalities regarding the service of customers and use of face masks and coverings.

If a Dealership employee encounters an unvaccinated customer who refuses to wear a face covering, due to the declaration by the EEOC that an individual with COVID-19 poses a direct threat to the health of others, a Dealership employee shall ask the customer the following:

- Are you unable to wear a mask because of a disability?
 - If the answer is “Yes”:
 - Do not ask additional questions regarding the disability
 - Do not ask for documentation for proof of a disability
 - Do work with the customer to find a way to meet their needs without risking the safety of other customers and employees by offering curbside service outside of the dealership
 - If the answer if “No” we may:
 - Offer the customer a face mask to use while inside the dealership/service area
 - Refuse entry to the dealership/service area if the customer still refuses to wear a mask
 - Arrange a socially distanced customer experience or offer the customer curbside service if feasible

EXPOSURE AND RETURN TO WORK REQUIREMENTS

Employee Exhibits COVID-19 Symptoms With or Without Test Results: If an employee exhibits COVID-19 symptoms, with or without test results confirming a COVID-19 diagnosis (or is unable to be tested), the employee must be sent home and remain at home until either:

- At least 10 days since symptoms first appeared **and**
- At least 24 hours with no fever without fever-reducing medication **and**
- Symptoms have improved

Employee Tests Positive for COVID-19 with no symptoms: An employee who tests positive for COVID-19 will be directed to self-quarantine away from work. Employees that test positive and continue to remain symptom free may return to work when:

- 10 days have passed since positive test

Employee Has Close Contact with an Individual Who Has Tested Positive for COVID-19: Employees who have come into close contact with an individual who has tested positive for COVID-19 (co-worker or otherwise) must be sent home and remain at home until 14 days after the employee’s last exposure to that person.

Quarantine instructions for employees who are fully vaccinated: Fully vaccinated employees who meet the following criteria are no longer be required to quarantine following an exposure to someone with COVID-19²:

- People are considered fully vaccinated:
 - 14 days after the second dose if given a two dose vaccine (Pfizer, Moderna)
 - 14 days after the one dose if given a one dose vaccine (Johnson & Johnson)

Employees should keep their COVID-19 Vaccination Record Card to confirm their exemption from quarantine.

WORKPLACE FLEXIBILITIES AND POTENTIAL BENEFITS FOR EMPLOYEES AFFECTED BY COVID-19

² If a fully vaccinated employee tests positive or develops symptoms of COVID-19, the employee is no longer exempt from quarantine and must follow the quarantine protocols for symptomatic and/or positive-testing employees.

Employees may be eligible for paid and unpaid leaves of absence. Employees may be permitted to utilize available paid time off provided under the Dealership policies concurrently with or to supplement any approved leave.

FMLA and ADA

Employees may be entitled to unpaid leave under the Family and Medical Leave Act (“FMLA”) if their absence is related to their own serious health condition or that of a family member. COVID-19 may constitute a serious health condition where “complications arise.”

The Dealership is also mindful of its obligations under the Americans with Disabilities Act (“ADA”). Specifically, if an employee requests an accommodation because of a condition that may be complicated by COVID-19 (e.g., cystic fibrosis, emphysema, COPD), then the Dealership engages in the interactive process to provide a reasonable accommodation. This may mean allowing the employee to work remotely (if reasonable) or work an alternative schedule.

ACT NO. 238 PUBLIC ACTS OF 2020

Sec. 3.

(1) Except as provided in subsection (2), an employer shall not discharge, discipline, or otherwise retaliate against an employee who does any of the following:

- (a) Complies with section 5, including where an employee who displays the principal symptoms of COVID-19 does not report to work and later tests negative for COVID-19.
- (b) Opposes a violation of this act.
- (c) Reports health violations related to COVID-19.

(2) Subsection (1) does not apply to an employee described in section 5 who, after displaying the principal symptoms of COVID-19, fails to make reasonable efforts to schedule a COVID-19 test within 3 days after receiving a request from their employer to get tested for COVID-19.

Sec. 5.

(1) An employee who tests positive for COVID-19 must not report to work until they are advised by a health care provider or public health professional that they have completed their isolation period, or all of the following conditions are met:

- (a) If the employee has a fever, 24 hours have passed since the fever has stopped without the use of fever reducing medications.
- (b) The isolation period has passed.
- (c) The employee’s principal symptoms of COVID-19 have improved.
- (d) If the employee has been advised by a health care provider or public health professional to remain isolated, the employee is no longer subject to such advisement.

(2) An employee who displays the principal symptoms of COVID-19 but has not yet tested positive shall not report to work until 1 of the following conditions are met:

- (a) A negative diagnostic test result has been received.
- (b) All of the following apply:
 - (i) The isolation period has passed since the principal symptoms of COVID-19 started.
 - (ii) The employee’s principal symptoms of COVID-19 have improved.
 - (iii) If the employee had a fever, 24 hours have passed since the fever subsided without the use of fever-reducing medication.

(3) Except as provided in subsection (4), an employee who has close contact with an individual who tests positive for COVID-19 shall not report to work until 1 of the following conditions is met:

- (a) The quarantine period has passed since the employee last had close contact with the individual.
- (b) The employee is advised by a health care provider or public health professional that they have completed their period of quarantine.

(4) Subsection (3) does not apply to an employee who is any of the following:

- (a) A health care professional.
- (b) A worker at a health care facility.

- (c) A first responder.
- (d) A child protective service employee.
- (e) A worker at a child caring institution, as that term is defined in section 1 of 1973 PA 116, MCL 722.111.
- (f) A worker at an adult foster care facility, as that term is defined in section 3 of the adult foster care facility licensing act, 1979 PA 218, MCL 400.703.
- (g) A worker at a correctional facility.
- (h) A worker in the energy industry who performs essential energy services as described in the United States Cybersecurity and Infrastructure Security Agency's Guidance on the Essential Critical Infrastructure Workforce: Ensuring Community and National Resilience in COVID-19 Response, Version 2.0, March 28, 2020.
- (i) A worker identified by the director of the department of health and human services as necessary to ensure continuation of essential public health services and enforcement of health laws, or to avoid serious harm or danger to public health or public safety. The director of the department of health and human services shall designate categories of critical employees at facilities where cessation of operations would cause serious harm or danger to public health or safety.

PLAN UPDATES AND EXPIRATION

This Plan responds to the COVID-19 outbreak. As this pandemic progresses, the Dealership will update this Plan and its corresponding processes.

This Plan will expire upon conclusion of its need, as determined by the Dealership and in accordance with guidance from local, state, and federal health officials.