

# **COVID-19 Preparedness and Response Plan**

*Effective June 5, 2020*

## **INTRODUCTION**

V2Soft, Inc. (hereinafter “Company”) takes the health and safety of our workers very seriously. With the spread of the coronavirus or “COVID-19,” a respiratory disease caused by the SARS-CoV-2 virus, the Company must remain vigilant in mitigating COVID-19’s impact. In order to promote safety and maintain operations, we have developed this COVID-19 Preparedness and Response Plan (“Plan”) to be implemented effective as of June 5, 2020 throughout the Company.

This Plan is based on information available from the U.S. Department of Health and Human Services’ Centers for Disease Control and Prevention (“CDC”), the U.S. Department of Labor’s Occupational Safety and Health Administration (“OSHA”), Mich. Exec. Order No. 2020-36 (Apr. 3, 2020), [https://www.michigan.gov/whitmer/0,9309,7-387-90499\\_90705-524136--,00.html](https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705-524136--,00.html) (“Order 2020-36”), Mich. Exec. Order No. 2020-110 (June 1, 2020), [https://www.michigan.gov/whitmer/0,9309,7-387-90499\\_90705-530620--,00.html](https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705-530620--,00.html) (“Order 2020-110”), and Mich. Exec. Order No. 2020-114 (June 5, 2020), [https://www.michigan.gov/whitmer/0,9309,7-387-90499\\_90705-531123--,00.html](https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705-531123--,00.html) (“Order 2020-114”) at the time of its development, and is subject to change based on further information provided by the CDC, OSHA, and other public officials. The Company may also amend this Plan based on operational needs.

The Company will use good faith, at all times, in employing the safety measures and procedures of the Plan.

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## **RESPONSIBILITIES OF MANAGERS AND SUPERVISORS**

All managers and supervisors must be familiar with this Plan and be ready to answer questions from employees. Managers and supervisors must follow this Plan at all times at work. Managers and supervisors must require this same behavior from all employees.

## **RESPONSIBILITIES OF EMPLOYEES**

In our efforts to protect the health and safety of our employees, the Company is asking every one of our employees to play their part. As set forth in this Plan, the Company has instituted various practices, which all employees must follow at work. If employees have specific questions about this Plan or COVID-19, such employees should ask the Company's workplace coordinator responsible for COVID-19 issues or their manager or supervisor.

## **BASIC INFECTION PREVENTION MEASURES**

The Company has implemented the following basic infection prevention measures.

All managers, supervisors, and employees of the Company (collectively, "workers") must:

- Frequently and thoroughly wash their hands with soap and water for at least 20 seconds.
  - Use an alcohol-based hand rub with at least 60% alcohol if soap and running water are not immediately available.
- Avoid touching their eyes, noses, or mouths with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering coughs and sneezes.
- Stay home if they are sick.
- Refrain from using other workers' phones, desks, offices, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.
- Adhere to social distancing practices and mitigation measures recommended by the CDC, including but not limited to:
  - Remaining at least 6 feet from people from outside the workers' households to the extent feasible under the circumstances.
  - Wearing cloth masks outside their homes where other social distancing practices are difficult to follow, and especially in areas of significant community-based transmission.
- Wear a covering over their noses and mouths—such as a homemade mask, scarf, bandana, or handkerchief—when:
  - in any enclosed public space if they are able to medically tolerate a face covering; or
  - workers cannot consistently maintain 6 feet of separation from other individuals in the workplace.

The Company will:

- Require any work that is capable of being performed remotely (i.e., without the worker leaving his or her home or place of residence) be performed remotely.

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- Establish policies and practices to promote remote work to the fullest extent possible, such as flexible worksites (e.g., telecommuting) and flexible work hours (e.g., staggered shifts) to increase the physical distance among workers and between workers and others in accordance with mandatory social distancing measures.
- Stay abreast of guidance from federal, state, local, tribal, and/or territorial health agencies, and consider how to incorporate those recommendations and resources into the Plan.
- Make cleaning supplies available to workers upon entry and at the worksite.
  - Provide workers, customers, and worksite visitors with a place to wash their hands.
    - Provide them an alcohol-based hand rub with at least 60% alcohol if soap and running water are not immediately available.
  - Provide workers time to wash hands frequently or to use hand sanitizer.
- Provide customers and the public with tissues and trash receptacles.
- Keep everyone on the worksite premises at least 6 feet from one another to the maximum extent possible, including through the use of ground markings, signs, and physical barriers, as appropriate to the worksite.
- Conduct a daily entry self-screening protocol for all workers or contractors entering the workplace, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19.
  - An individual may be required to temporarily remove a face covering upon entering an enclosed public space for identification purposes.
  - The Company must maintain a record of the daily self-screenings.
  - The Company, and those authorized to act on its behalf, are permitted to deny entry or access to any individual who refuses to comply with requirements regarding wearing a covering over one's nose and mouth.
- Follow social distancing practices and mitigation measures recommended by the CDC, to the extent practicable and applicable to the Company's business.
- Establish an emergency communications plan.
  - Identify key contacts (with back-ups), chain of communications (including suppliers and customers), and processes for tracking and communicating about business and worker status.
  - Share Plan with workers and clearly communicate expectations.
- Conduct a thorough hazard assessment to determine if workplace hazards are present, or are likely to be present, and determine what type of controls or PPE are needed for specific job duties.
- Modify the layout of lobbies, break rooms, lunch rooms, and other common areas to reduce the number of tables, chairs, and other furniture to maintain proper social distancing practices as necessary.
- Restrict business-related travel for workers to essential travel only.
- Encourage workers to use Personal Protective Equipment ("PPE") and hand sanitizer on public transportation.
- Provide to its workers, at a minimum, non-medical grade face coverings.
  - Supplies of N95 masks and surgical masks should generally be reserved, for now, for health care professionals, first responders (e.g., police officers, fire fighters, paramedics), and other critical workers.

- Consider face shields when workers cannot consistently maintain 3 feet of separation from other individuals in the workplace.
- Enhance regular housekeeping practices to limit exposure to COVID-19, including increasing the frequency and thoroughness of cleaning and disinfecting of surfaces, equipment, and other elements of the work environment, especially high-touch surfaces (e.g., door handles) and parts, products, and shared equipment (e.g., tools, machinery, vehicles), and use U.S. Environmental Protection Agency (“EPA”)-approved disinfectants with claims against emerging viral pathogens and follow the manufacturer’s instructions for use of all cleaning and disinfection products (e.g., concentration, application method and contact time, and PPE).
  - If practicable, provide disposable wipes so that commonly used surfaces (for example, doorknobs, keyboards, remote controls, desks, other work tools and equipment) can be wiped down by workers before each use.
  - Follow the CDC’s Interim Recommendations for U.S. Community Facilities with Suspected/Confirmed Coronavirus Disease 2019 (COVID-19) (<https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html>) if a Company facility has a suspected or confirmed case of COVID-19.

### **OFFICE-SPECIFIC INFECTION PREVENTION MEASURES**

At Company’s office(s), the Company will:

- Assign dedicated entry point(s) for all workers to reduce congestion at the main entrance.
- Provide visual indicators of appropriate spacing for workers outside the building in case of congestion.
- Take steps to reduce entry congestion and to ensure the effectiveness of screening (e.g., by staggering start times, adopting a rotational schedule in only half of workers are in the office at a particular time).
- Require face coverings in shared spaces, including during in-person meetings and in restrooms and hallways.
- Increase distancing between workers by spreading out workspaces, staggering workspace usage, restricting non-essential common space (e.g., cafeterias), providing visual cues to guide movement and activity (e.g., restricting elevator capacity with markings).
- Prohibit social gatherings and meetings that do not allow for social distancing or that create unnecessary movement through the office. Use virtual meetings whenever possible.
- Provide disinfecting supplies and require workers wipe down their work stations at least twice daily.
- Post signs about the importance of personal hygiene.
- Disinfect high-touch surfaces in offices (e.g., whiteboard markers, restrooms, handles) and minimize shared items when possible (e.g., pens, remotes, whiteboards).
- Institute cleaning and communications protocols when workers are sent home with symptoms.
- Notify workers if the Company learns that an individual (including a customer, supplier, or visitor) with a confirmed case of COVID-19 has visited the office.
- Suspend all nonessential visits by others.

- Restrict all non-essential travel, including in-person conference events.

### **POLICIES AND PROCEDURES FOR WORKERS PLACED AT CLIENT SITES**

The Company will:

- Require workers placed at client sites to follow:
  - Client's policies, procedures, and measures for COVID-19 infection prevention and mitigation; and
  - Applicable governmental directives regarding COVID-19.
- Encourage workers to report any unsafe working conditions at client sites.
  - Work with client and worker(s) to remedy any unsafe working conditions in accordance with Company policy and applicable governmental directives.

### **POLICIES AND PROCEDURES FOR PROMPT IDENTIFICATION AND ISOLATION OF SICK PEOPLE**

Prompt identification and isolation of potentially infectious individuals is a critical step in protecting workers, customers, visitors, and others at a worksite.

The Company has implemented the following policies and procedures for prompt identification and isolation of sick people:

- Workers must self-monitor for signs and symptoms of COVID-19 if they suspect possible exposure.
- Workers exhibiting signs and symptoms of COVID-19 or suspecting exposure to COVID-19 are prohibited from entering any Company premise or client-worksite.
- Workers testing positive for COVID-19 or demonstrating principal symptoms of COVID-19, such as fever, atypical cough, or atypical shortness of breath must not come into work.
  - Instead, such workers must notify their manager or supervisor right away.
  - Such workers may only come into work:
    - After 3 days have elapsed since their symptoms resolved, and 14 days have passed since their symptoms first appeared or since they were swabbed for the test that yielded the positive result; or
    - After their symptoms have resolved and they have received negative results of an FDA Emergency Use Authorized molecular assay for COVID-19 from at least 2 consecutive respiratory specimens collected  $\geq 24$  hours apart (total of 2 negative specimens).
- Workers must not come into work if they have had close contact with an individual who tests positive for COVID-19 or with an individual who displays one or more of the principal symptoms of COVID-19 (fever, atypical cough, or atypical shortness of breath).
  - Instead, such workers must notify their manager or supervisor right away.
  - Such workers may only come into work:
    - After 14 days have passed since the last close contact with the sick or symptomatic individual assuming they have not subsequently developed symptoms; or

- They have received negative results of an FDA Emergency Use Authorized molecular assay for COVID-19 from at least 2 consecutive respiratory specimens collected  $\geq 24$  hours apart (total of 2 negative specimens).
- The Company will designate and train certain workers as point persons for how to immediately isolate a person who shows symptoms of COVID-19 at work.
  - In such a case, while maintaining proper social distancing, the point person should take the potentially infectious person to a location away from workers, customers, and other visitors.
    - If not acutely sick, send the potentially infectious person home and instruct them to call a medical provider.
    - If acutely sick, refer the potentially infectious person to a medical facility.
    - Although most worksites do not have specific isolation rooms, designated areas with closable doors may serve as isolation rooms until a potentially sick person can be removed from the worksite.
- The Company must take steps to limit spread of the respiratory secretions of a person who may have COVID-19, including providing a face mask and asking the person to wear it.
- If possible, the Company must isolate people suspected of having COVID-19 separately from those with confirmed cases to prevent further transmission using either a permanent (e.g., wall/different room) or temporary barrier (e.g., plastic sheeting).
- The Company must restrict the number of workers and others entering isolation areas.
- The Company must protect workers in close contact with (i.e., within 6 feet of) a sick person or who have prolonged/repeated contact with such persons by using additional engineering and administrative controls, safe work practices, and PPE.
- If a worker is confirmed to have COVID-19 or has been determined to be presumptively positive for COVID-19, the Company must notify the local public health department immediately and any fellow workers, contractors, or suppliers who may have come into contact with the person confirmed, or presumptively determined, to have COVID-19 of their possible exposure to COVID-19 in the workplace within 24 hours but maintain confidentiality as required by the Americans with Disabilities Act (“ADA”).
  - The Company must maintain a record of making any such notifications.
  - The Company will instruct such fellow workers and any other applicable individuals about how to proceed based on the CDC Public Health Recommendations for Community-Related Exposure (<https://www.cdc.gov/coronavirus/2019-ncov/php/public-health-recommendations.html>).
- If a sick worker is suspected or confirmed to have COVID-19, the Company will follow the CDC cleaning and disinfection recommendations, which may include temporary closures of all or part of the workplace to allow for deep cleaning.

## **WORKPLACE FLEXIBILITIES AND PROTECTIONS**

The Company is first and foremost concerned about the health and safety of its workers. The Company’s policies and procedures serve to protect its workers and their families.

The Company has implemented the following workplace flexibilities:

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- Unless other leave or payments required and/or permitted by law are available, the Company will treat a worker who is absent from work because that worker is at particular risk of infecting others with COVID-19 pursuant to the Company's leave policies and the Families First Coronavirus Response Act as applicable.
- The Company will follow Order 2020-36, and any executive orders that follow it, that prohibit discharging, disciplining, or otherwise retaliating against workers who stay home or who leave work when they are at particular risk of infecting others with COVID-19.
  - However, those workers who are allowed to return to work but decline to do so may face discipline up to and including termination of employment.
  - Furthermore, workers who return to work, if they test positive for COVID-19 or who display one or more of the principal symptoms of COVID-19, before 3 days have elapsed since their symptoms resolved, or before 14 days have passed since their symptoms first appeared or since they were swabbed for the test that yielded the positive result, or before 14 days have passed since the last close contact with a sick or symptomatic individual, or the symptomatic individual receives a negative COVID-19 test may be disciplined up to and including termination of employment because such behavior places other workers and their families at *an increased risk* of contracting COVID-19.
    - The Company will allow workers 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 they are released from any quarantine or isolation by the local public health department.
- Although the Company will not require a healthcare provider's note for workers who are sick with COVID-19, unless otherwise permitted by law, to validate their illness or to return to work, the Company expects workers to utilize honest, good-faith, and honorable conduct when making decisions regarding COVID-19 related sick leave and returning to work.
- In the event leave is related to the care of a family member who is sick with COVID-19 while the worker is not, the Company will try, to the extent possible, to utilize the worker in a remote working capacity in order to reduce the leave necessary for the worker to expend. However, there are circumstances and worker-titles that do not support remote working and possibly cannot be accommodated.

The Company has implemented the following workplace protections:

- The Company will communicate with any businesses that provide the Company with contract or temporary workers about the importance of sick workers staying home and encourage the businesses to develop non-punitive leave policies that comply with applicable law.
- The Company's policies and procedures pertaining to COVID-19 are contained in this guide. Such policies and procedures and other best practices will be disseminated via electronic communication, and posted at all worker entrances, exits, and common areas.
- Within two weeks of resuming in-person activities, the Company must make the Plan readily available to workers, labor unions, and customers, whether via website, internal network, or by hard copy.

- HR Department and, specifically, SUMATHY GANESH will have the complete compilation of the Company's workplace protections and other related policies. These policies and procedures can be reviewed at any point during business hours.
- Operations Department and, specifically, SUMATHY GANESH will have information specific to the medical insurance plan offered by the Company. Workers should contact the aforementioned with questions about medical care in the event of a COVID-19 outbreak.
  - VARCHASVI SHANKAR, SUMATHY GANESH will be the workplace coordinators who will be responsible for implementing, monitoring, and reporting on the COVID-19 control strategies developed under the Plan.
  - At least one workplace coordinator must always remain on-site when workers are present on site.
  - An on-site worker may be designated to perform the workplace coordinator role.
  - The workplace coordinator will be responsible for designating and training workers as point persons to help manage COVID-19 issues and their impact at the workplace.
  - The workplace coordinator will provide, and maintain a record of, COVID-19 training to all workers that covers, at a minimum:
    - Workplace infection-control practices.
    - The proper use of PPE.
    - Steps the worker must take to notify the Company of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
    - How to report unsafe working conditions.
  - The workplace coordinator must be familiar with OSHA's Guidance on Preparing Workplaces for COVID-19 (attached as **Appendix 2**) and ensure that the Company follows such guidance.

### **EXISTING OSHA STANDARDS**

While there is no specific OSHA standard covering exposure to COVID-19, existing OSHA standards may apply to protect workers from such exposure. Hence, the Company must follow all existing OSHA standards.

### **CONTINGENCY PLANS**

The Company must follow federal and state, local, tribal, and/or territorial recommendations regarding development of contingency plans for situations that may arise as a result of outbreaks, such as:

- Increased rates of worker absenteeism.
- The need for social distancing, staggered work shifts, downsizing operations, delivering services remotely, and other exposure-reducing measures.
- Options for conducting essential operations with a reduced workforce, including cross-training workers across different jobs in order to continue operations or deliver surge services.
- Interrupted supply chains or delayed deliveries.

## **LEVEL OF RISK OF OCCUPATIONAL EXPOSURE**

The Company must determine the level(s) of risk of occupational exposure to COVID-19 associated with various worksites and job tasks workers perform at those sites. During an outbreak, the levels may vary from very high to high, medium, or lower (caution) risk. The level of risk depends in part on the industry type, need for contact within 6 feet of people known to be, or suspected of being, infected with SARS-CoV-2, or requirement for repeated or extended contact with persons known to be, or suspected of being, infected with SARS-CoV-2.

### *Very High Exposure Risk*

Very high exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures. Workers in this category include:

- Healthcare workers (e.g., doctors, nurses, dentists, paramedics, emergency medical technicians) performing aerosol-generating procedures (e.g., intubation, cough induction procedures, bronchoscopies, some dental procedures and exams, or invasive specimen collection) on known or suspected COVID-19 patients.
- Healthcare or laboratory personnel collecting or handling specimens from known or suspected COVID-19 patients (e.g., manipulating cultures from known or suspected COVID-19 patients).
- Morgue workers performing autopsies, which generally involve aerosol-generating procedures, on the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death.

### *High Exposure Risk*

High exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19. Workers in this category include:

- Healthcare delivery and support staff (e.g., doctors, nurses, and other hospital staff who must enter patients' rooms) exposed to known or suspected COVID-19 patients. (Note: when such workers perform aerosol-generating procedures, their exposure risk level becomes very high.)
- Medical transport workers (e.g., ambulance vehicle operators) moving known or suspected COVID-19 patients in enclosed vehicles.
- Mortuary workers involved in preparing (e.g., for burial or cremation) the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death.

### *Medium Exposure Risk*

Medium exposure risk jobs include those that require frequent and/or close contact with (i.e., within 6 feet of) people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients. In areas without ongoing community transmission, workers in this risk group may have frequent contact with travelers who may return from international locations

with widespread COVID-19 transmission. In areas where there is ongoing community transmission, workers in this category may have contact with the general public (e.g., schools, high-population-density work environments, some high-volume retail settings).

*Lower Exposure Risk (Caution)*

Lower exposure risk (caution) jobs are those that do not require contact with people known to be, or suspected of being, infected with SARS-CoV-2 nor frequent close contact with (i.e., within 6 feet of) the general public. Workers in this category have minimal occupational contact with the public and other coworkers.

The Company has determined that it has lower exposure risk for its workers.

**PROTECTING WORKERS WITH JOBS AT LOWER EXPOSURE RISK (CAUTION)**

The Company must implement workplace controls sufficient to protect workers with jobs at lower exposure risk (caution).

*Engineering Controls*

Engineering controls involve isolating workers from work-related hazards.

The Company has implemented the following engineering controls:

- For work activities where social distancing is a challenge, consider limiting the duration of these activities and/or implementing innovative approaches, such as temporarily moving or repositioning workstations to create more distance or installing barriers (e.g., plexiglass shields) between workstations.
- Ensure the safety of the Company's building(s) water system(s).

The Company should consider improving the Company's building(s) ventilation system(s). This may include some or all of the following activities:

- Increase ventilation rates.
- Ensure ventilation systems operate properly and provide acceptable indoor air quality for the current occupancy level for each space.
- Increase outdoor air ventilation, using caution in highly polluted areas. With a lower occupancy level in the building, this increases the effective dilution ventilation per person.
- Disable demand-controlled ventilation ("DCV").
- Further open minimum outdoor air dampers (as high as 100%) to reduce or eliminate recirculation. In mild weather, this will not affect thermal comfort or humidity. However, this may be difficult to do in cold or hot weather.
- Improve central air filtration to the MERV-13 or the highest compatible with the filter rack, and seal edges of the filter to limit bypass.
- Check filters to ensure they are within service life and appropriately installed.

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- Keep systems running longer hours, 24/7 if possible, to enhance air exchanges in the building space.

Additional engineering controls are not recommended for workers in the lower exposure risk group. However, the Company must ensure that engineering controls, if any, used to protect workers from other job hazards continue to function as intended.

### *Administrative Controls*

Administrative controls require action by the worker or Company. Typically, administrative controls are changes in work policy or procedures to reduce or minimize exposure to a hazard.

The Company has implemented the following administrative controls:

- Monitor public health communications about COVID-19 recommendations and ensure that workers have access to that information.
- Frequently check the CDC COVID-19 website: [www.cdc.gov/coronavirus/2019-ncov](http://www.cdc.gov/coronavirus/2019-ncov).
- Collaborate with workers to designate effective means of communicating important COVID-19 information.

### *Personal Protective Equipment*

Examples of PPE include: gloves, goggles, face shields, face masks, and respiratory protection. During an outbreak of COVID-19, recommendations for PPE specific to occupations or job tasks may change depending on geographic location, updated risk assessments for workers, and information on PPE effectiveness in preventing the spread of COVID-19.

The Company must check the OSHA and CDC websites regularly for updates about recommended PPE. Additional PPE is not recommended for workers in the lower exposure risk group. Workers should continue to use the PPE, if any, that they would ordinarily use for other job tasks.

## **ADDITIONAL LEGAL REQUIREMENTS AND EXCEPTIONS**

The Company will:

- Follow the CDC's Interim Guidance for Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19, attached as **Appendix 1**, to the extent practicable and applicable to the Company's business.
- Follow OSHA's Guidance on Preparing Workplaces for COVID-19, attached as **Appendix 2**, to the extent practicable and applicable to the Company's business. Such plan must be available at Company headquarters or the Company's worksite.

For additional legal requirements and exceptions as well as CDC and OSHA guidance, please see the following:

- Interim Guidance for Businesses and Employers at [https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html?CDC\\_AA\\_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fspecific-groups%2Fguidance-business-response.html](https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fspecific-groups%2Fguidance-business-response.html).
- Guidance on Hazard Recognition at <https://www.osha.gov/SLTC/covid-19/hazardrecognition.html>.
- COVID-19 Control and Prevention at [https://www.osha.gov/SLTC/covid-19/controlprevention.html#interim\\_guidance](https://www.osha.gov/SLTC/covid-19/controlprevention.html#interim_guidance).
- Prepare your Small Business and Employees for the Effects of COVID-19 at <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-small-business.html>.
- Discontinuation of Isolation for Persons with COVID-19 Not in Healthcare Settings at <https://www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html>.