



COVID-19 Business Operation Plan - Sulianich

Purpose

In order to support the safety of employees and customers as the local economy begins to recover with the reopening of businesses from the COVID-19 pandemic, each business shall establish a risk mitigation “Business Operation Plan” (Plan) and shall maintain each plan at their business location. **The purpose of the Plan is to formally develop and establish the Best Management Practices (BMPs) the business will complete and implement to ensure a safe environment.** The BMPs will explain the necessary policies, practices and conditions that will be implemented to meet the Centers for Disease Control and Prevention (CDC), Alaska Department of Health & Social Services, Northwest Arctic Borough (NAB), and City of Kotzebue guidelines for COVID-19, and also the federal Occupational Safety and Health Administration (OSHA) standards related to worker exposure to COVID-19.

The following minimum implementation measures are included in this plan, which must be met, expanded upon, and described by Sulianich:

1. Infection prevention measures;
2. Prompt identification and isolation of sick persons;
3. Engineering and administrative controls for social distancing, including reduced occupancy requirements;
4. Sanitation policies and procedures, including cleaning, disinfecting and decontamination;
5. Communications and training for managers and staff necessary to implement the plan; and
6. Procedures to ensure effective ongoing implementation of the plan.

In addition to the checklist of Best Management Practices, additional, supporting documentation shall always be available to provide additional specificity and expectations for all employees as the BMPs are implemented.

Enforcement of this plan is at the discretion of the appropriate governing body. **As such, it is the sole responsibility of the business establishment to implement this plan for the health and safety of their employees, patrons, and the common good.**



COVID-19 Business Operation Plan for Sulianich

Sulianich recognizes that in operating their business, there are risks of exposure to COVID-19 for employees and customers, as it is highly contagious and has a mortality rate greater than the flu. In addition:

- COVID-19 can spread easily and exponentially
- While persons of all ages are at risk for catching COVID-19, individuals with compromised immune systems and the elderly may be at particular risk.

In operating, Sulianich acknowledges the risks of COVID-19 exposure to its employees and customers and is committed to providing a safe and healthy business environment. To ensure that, the following Business Operation Plan (Plan) in response to the COVID-19 pandemic has been developed. All employees, including managers and staff, are responsible for implementing and complying with all aspects of this Plan to mitigate the potential for transmission of COVID-19 in our workplaces, and requires full cooperation among staff and management. Only through this cooperative effort can the safety and health of all staff and persons in our workplace be maintained and established. Sulianich managers and supervisors have full support in enforcing the provisions of this policy.

Our staff are our most important assets, and we want to ensure that they and our customers remain healthy and safe. We are serious about safety and health and keeping our staff working at Sulianich Our Plan follows Centers for Disease Control and Prevention (CDC), Alaska Department of Health & Social Services, Northwest Arctic Borough (NAB), and City of Kotzebue guidelines for COVID-19, as well as the federal OSHA standards related to COVID-19, and addresses the following:

1. Infection prevention measures;
2. Prompt identification and isolation of sick persons;
3. Engineering and administrative controls for social distancing, including reduced occupancy requirements;
4. Sanitation policies and procedures, including cleaning, disinfecting and decontamination;
5. Communications and training for managers and staff necessary to implement the plan; and
6. Procedures to ensure effective ongoing implementation of the plan.

Date of Implementation: 10-22-20

Authorized by: [Signature]

Title: Community & Economic Development Director (NAB)



Infection Prevention Measures

Protective Supplies:

- Masks
 - Provided to staff
 - Required to be worn by customers
 - Staff will wear masks provided by the NAB and Sulianich
- Gloves
 - Provided to staff for optional use
- Hand Sanitizer
 - Located in multiple places within Sulianich Building
- Disinfectant and sanitation materials provided to staff
 - Sanitizing Spray located in designated area in Sulianich Building _____
 - Sanitizing Wipes located in designated area in Sulianich Building
 - Alcohol-based (60%+) cleaning solutions located in designated area in Sulianich Building
 - Regular checks by NAB management and Sulianich staff for cleaning supply inventory

Sanitation and Respiratory etiquette:

- Directions are provided to staff and visitors on importance of using hand sanitizer
- Directions are provided to staff and visitors are being instructed to cover their mouth and nose with their sleeve or a tissue when coughing or sneezing and to avoid touching their face, in particular their mouth, nose and eyes, with their hands.
- Customers and artists will not be able to enter Sulianich Building

External Risk Mitigation:

- Deliveries only accepted from those that are masked. Upon accepting the delivery staff will use hand sanitation protocol
- Customers and artists will be able to visit upon appointment only. Facility will not have more than 10 people at one time in the facility and not more than one party.
- Customers, visitors and artists will be asked the following questions upon entering Sulianich Building
 - Are you experiencing any symptoms associated with COVID? (fever, sore throat, loss of taste and/or smell)
 - Have you been in contact with anyone in the past 14 days who has tested positive for COVID?
 - All customers and artists will sign in with a phone number for the sole purpose of notification of a potential exposure.
- If contact tracing identifies exposure the Sulianich building will be closed immediately for 48 hours and will activate the deep cleaning procedures and notifications will occur upon need.

Other:



Identification and Isolation

Screening Process:

- Staff have been informed of, and encouraged to, self-monitor for signs and symptoms of COVID-19
- Screening and evaluating staff who exhibit signs of illness

Sick Leave Policy:

- Policy has been implemented to protect the privacy of staff' health status and health information
 - See Attached

Quarantine Process:

- Those that report mild symptoms to remain at home until symptoms subside for at least 72 hours
- Those with symptoms to remain home for 14 days
- Those with symptoms to seek testing to confirm COVID-19 diagnosis and follow orders from healthcare provider
- Staff or artists are not able to return to the facility without 2 subsequent negative tests



Protocols for Social Distancing

Social distancing is being implemented in the workplace through the following engineering and administrative controls.

Employees:

- Maintain six feet of distance between staff
 - Provide signage or instructions
- Use hand sanitation procedures between all customer interactions

Customers:

- Customers and artists will be able to visit upon appointment only. Facility will not have more than 10 people at one time in the facility and not more than one party.
- Maintain six feet of distance between customers
 - Provide signage or instructions



Sanitation Policies and Procedures

Sulianich will use procedures supplied by the CDC (see links below)

Employee Hygiene:

- Handwashing guidance and instruction
- Handwashing requirement after handling external elements (e.g. mail and packages, currency, etc.)
- Requirement to use hand sanitizer between handwashing

Facility Housekeeping:

- General Workplace Environment cleaned every week
- Frequent cleaning and disinfecting will be conducted in high-touch areas, such as phones, keyboards, touch screens, controls, door handles, elevator panels, railings, copy machines, etc. cleaned every day
- Materials used to clean include the following:
 - Sanitizing Spray located in designated area in Sulianich Building _____
 - Sanitizing Wipes located in designated area in Sulianich Building
 - Alcohol-based (60%+) cleaning solutions located in designated area in Sulianich Building



Communications and Training

Plan Development:

- Plan was developed with input from the following staff: Sulianich Coordinator, NAB C&EDA Director, NAB C&EDA Administrator, NAB Public Services Administrator

- Describe how worker concerns have been addressed, how worker suggestions and feedback have been integrated into developing the plan: Employees were able to voice concerns and those concerns were added within this mitigation plan.

- Describe policies and protocols developed specifically tailored for the business, and how they relate:
 - Artists and customers are able to visit by appointment only.
 - Immediate closure upon information of known exposure

Initial Business Operation Plan Implementation:

- This Business Operation Plan was communicated to all staff on 10/1/20 in the following way:
 - Copy of BOP emailed to staff
 - Face to face meeting
- Additional communication and training will be ongoing and provided to all staff who did not receive the initial training in the following way.



Ongoing Implementation

Plan Effectiveness:

- Managers and supervisors are to monitor how effective the Plan has been implemented:
 - Weekly check-ins with staff regarding effectiveness of policy and protocols
 - Communication upon need as follows: In response to the feedback, the following changes are needed:
- Management and staff are to work through this new program together and update the training as necessary. Trainings include the following: BOP, cleaning procedures

Plan Revisions (upon need):

- Identify the reason and date of each revision that has been made below:
 - 1.
 - 2.
 - 3.
 - 4.
 - 5.
 - 6.
 - 7.



Appendix A – Guidance on COVID-19 Best Management Practices

www.cdc.gov/coronavirus/2019-nCoV

www.osha.gov

Handwashing

www.cdc.gov/handwashing/when-how-handwashing.html

www.cdc.gov/handwashing

<https://youtu.be/d914EnpU4Fo>

Respiratory etiquette: Cover your cough or sneeze

www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html

www.cdc.gov/healthywater/hygiene/etiquette/coughing_sneezing.html

Social distancing

www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html

Housekeeping

www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html

www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html

Employees exhibiting signs and symptoms of COVID-19

www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/steps-when-sick.html

6) LEAVE TIME

a) PERSONAL LEAVE:

- i) The Borough offers part- and full-time employees the benefit of paid personal leave. Personal leave is used when employees are absent from work for a variety of reasons, including vacation, medical or when they are sick. Employees may take planned personal leave upon prior written authorization by their supervisor (NABC 3.20.060). When employees are unable to work as scheduled (if their child is sick, for example), they must notify their supervisor as soon as possible in advance of taking personal leave. When an employee is absent for more than 3 working days for medical reasons, a doctor's certification may be required. Certifications received will be placed in the employee's confidential medical file.
- ii) Full-time employees accrue personal leave each pay period at the following rates per year, pursuant to NABC 3.20.010(A):

0 through 4 th year	25 days
5 th – 9 th year	30 days
10 th year and over	35 days
- iii) Employees on a flex schedule accrue personal leave according to NABC 3.20.010(B).
- iv) Part-time employees accrue personal leave time on a ratio of the hours they work to a 37.5-hour week (NABC 3.20.020).
- v) Employees exempt from the minimum wage and overtime requirements of the Fair Labor Standards Act ("FLSA") are held accountable for accomplishing the responsibilities of their positions and their salaries are not based on the number of hours worked. Each supervisor of an FLSA exempt employee is responsible for evaluating performance. If work hours are being abused and/or the employee is not completing job responsibilities, disciplinary action may be initiated. All employees must use personal leave for any time taken off in a regular workday.
- vi) Personal leave may not be taken during the probationary period (see section 4(c) above), but after completing the probationary period, personal leave shall accrue retroactive to date of hire and employees are eligible to take personal leave (NABC 3.20.110).
- vii) While on personal leave, Saturdays, Sundays, holidays and other regular scheduled days off will not be considered as personal leave time (NABC 3.20.050).
- viii) Unused personal leave time may be accumulated up to 30 working days. Employees accruing personal leave must take all accrued time off. If personal leave time exceeds 30 days in a year beginning July 1st and ending June 30th, the employee's excess time shall be forfeited by the employee unless the employee's supervisor certifies in

writing that the employee was denied use of accumulated leave time for reasons beyond the control of the employee. The employee's supervisor may postpone requested leave without loss for up to three additional months. No employee may use more than 16 consecutive working days of personal leave without the Mayor's approval (NABC 3.20.090).

- ix) There shall be no pay in lieu of earned personal leave except upon termination or death of the employee (NABC 3.20.100).
- x) No employee shall use more than 16 consecutive working days of personal leave without the Mayor's advance approval (NABC 3.20.090).
- b) TEMPORARY EMPLOYEES: Temporary employees shall not accrue personal leave and they are not entitled to holiday pay or subsistence leave. If a temporary employee is hired into a permanent position, the employee is entitled to personal leave accruals retroactive to the date of hire in the temporary position (NABC 3.20.030).
- c) LEAVE WITHOUT PAY: Employees may be granted leave without pay if approved by the Personnel Officer, provided the leave will not negatively impact the Borough (NABC 3.24.010). Personal leave time will not accrue while an employee is on leave without pay status (NABC 3.20.040).
- d) HOLIDAY LEAVE: The Borough recognizes the following as paid holidays for all but temporary employees:

- New Year's Day – January 1st
- Martin Luther King, Jr. Day – third Monday in January
- President's Day – third Monday in February
- NANA Day – the day of the NANA Annual Meeting
- Memorial Day – last Monday in May
- Fourth of July – July 4th
- Labor Day – first Monday in September
- Alaska Day – third Monday in October
- Veteran's Day – closest Monday to November 11th
- Thanksgiving Day – fourth Thursday in November
- Christmas Eve – December 24th
- Christmas Day – December 25th

When a holiday falls on a Saturday, the preceding Friday shall be observed as that holiday. When a holiday falls on a Sunday the following Monday shall be observed. Holidays falling on employee's personal leave time shall be counted as holiday leave (NABC 3.20.130).

- e) FAMILY LEAVE:

- i) The Borough is a covered employer under the Alaska Family Leave Act (“AFLA”), which is designed to help employees balance the demands of their jobs and the needs of their families. Under the AFLA, qualifying employees may take family leave as follows:
 - (1) Up to 18 workweeks in a 12-month period because of pregnancy and the birth of a child of the employee or the placement of a child with the employee for adoption;
or
 - (2) Up to 18 workweeks during any 24-month period because of the employee’s serious health condition or to care for the employee’s child, spouse, or parent who has a serious health condition. In this section, “child” includes the employee’s biological, adopted or foster child, stepchild, or legal ward.
- ii) An employee qualifies to take family leave if the employee has been employed at the Borough for at least 35 hours per week for at least six consecutive months or for at least 17.5 hours per week for at least 12 consecutive months immediately preceding the leave.
- iii) An employee taking leave under this section shall use accrued personal leave until the employee has only five days of personal leave remaining. The employee may choose whether to retain a balance of five days of personal leave and take the remaining leave as unpaid leave or whether to exhaust the personal leave balance.
- iv) If the necessity for family leave is foreseeable based on an expected birth or adoption or on planned medical treatment or supervision, the employee shall provide the department director with prior notice of the expected need for leave in a manner that is reasonable and practicable. If the necessity for leave is foreseeable based on planned medical treatment or supervision, the employee shall also make a reasonable effort to schedule the treatment or supervision so as not to disrupt the operations of the Borough.
- v) During the time that an employee is on leave under this section, the Borough shall maintain coverage under any group health plan at the level and under the conditions that coverage would have been provided if the employee had been employed continuously from the date the leave began to the date the employee returns from leave. However, the Borough may require that the employee pay all or part of the costs for maintaining health insurance coverage during a period of unpaid leave.
- vi) Unless the circumstances of the Borough have changed to make it impossible or unreasonable, when an employee returns from leave under this section, the Borough shall restore the employee to the position of employment held by the employee when the leave began or to a substantially similar position with substantially similar benefits, pay, and other terms and conditions of employment.

- f) ADMINISTRATIVE LEAVE: In certain special circumstances, an employee may be placed on paid or unpaid administrative leave by order of the Mayor. Circumstances may include family or personal emergencies, administrative policy review, or other extenuating circumstances.
- g) SCHOOL PARTICIPATION LEAVE: Employees may take reasonable paid leave to participate in school-related functions such as Inupiaq Day, parent-teacher conferences and volunteering, subject to prior approval of supervisor.
- h) SUBSISTENCE LEAVE: Subsistence leave is available to all but temporary employees, upon prior written approval of the supervisor and Mayor. "Subsistence" is defined as hunting, food gathering, and related traditional and cultural activities within the State of Alaska but does not include attending trade fairs. Subsistence leave is time off with pay. It is granted on the employee's anniversary date. Any unused portion from the previous year shall expire; it does not roll over from one year to the next. Subsistence leave cannot be cashed out if it is not used. Full-time employees are eligible to take subsistence leave based on the number of years of service as follows:

0 – 1 year	1 day
1 – 4 years	5 days
4 – 7 years	7 days
7 or more	10 days

Part-time employees who work 75 hours per pay period or more shall accrue subsistence leave at one-half the rate of full-time employees with the same time of service (NABC 3.20.070).

- i) BEREAVEMENT LEAVE: Employees may take paid bereavement leave of 3 consecutive work days in the event of a death in the immediate family, and 4 consecutive working days if travel out of state is required. "Immediate family" is defined as spouse, mother, father, brother, sister or dependent (child or other). Upon prior approval of their supervisors, employees may take leave during a workday to attend the funeral of a community member, including those outside of the immediate family.
- j) VOTING LEAVE: An employee who is a qualified voter who does not have sufficient time outside working hours to vote in a state election may, without loss of pay, take as much time off as will enable voting. Sufficient time outside working hours is 2 consecutive hours between the opening of the polls and the beginning of the employee's regular working shift, or between the end of the shift and the closing of the polls (NABC 3.24.050).
- k) ACTIVE MILITARY LEAVE: All employees, including those in probationary periods, shall be entitled to leaves of absence without pay to serve in the armed forces.