



Best Practices and Considerations for Nonprofit Re-engagement

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**CDC Guidelines Sample Families First Act Procedure** 

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# Continuing to Do Good

To all of my fellow nonprofit leaders in Florida,

The last several weeks have been incredibly challenging for the charitable sector. As 501c3s, we are called to serve our communities and our citizens. Whether we operate a shelter, a museum, a dog rescue, a counseling service, a social enterprise or one of hundreds of types of nonprofits, we wake up each day ready to "do good." Everywhere and every way we can.

COVID-19 has tested us in new ways. We adapted quickly and innovatively. And yet, through all the challenges, our sector has remained steadfast and continued to serve those in our communities.

Now, we begin a slow - and methodical - process of reopening our offices and facilities. It will not be like turning on a light switch. There are a number of procedures to follow. We will be doing business differently for the near future. But as nonprofits, we will continue to "do good," as that is what our missions compel us to do.

The Florida Nonprofit Alliance, with the guidance of the Oklahoma Center for Nonprofits, has put together this set of guidelines to use for reference as nonprofits begin to emerge back into open operations. These are guidelines and recommendations - certainly not edicts. It will be up to the decisions of leadership and boards of directors on how quickly you resume your general operations. I hope this tool serves as a useful guide to you as you navigate many important questions and discussions.

Thank you for all you do for Floridians.

Sabeen Perwaiz

# Important Disclaimer

The guidelines are intended simply as recommendations for organizations as those organizations put their own plans in place. Should nonprofits or congregations have specific questions regarding legal or financial issues, they should consult their own counsel and financial professionals.

Special Thanks to Oklahoma Center for Nonprofits for producing and sharing its statewide guide

## Florida Nonprofit Alliance

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# The Vision and Values of this Guidebook

#### **VISION**

The following ideals were used to give guidance and clarity.

- Follow all guidelines as directed by federal, state and local health departments as you begin this process.
- This is a process and not an event. Your organization may take a phased approach as you begin to reopen.
- Consider the health of your staff, volunteers, clientele and your constituents (donors, friends and allies) in all of your decision-making, especially as it relates to gatherings.
- Practice the "We love our neighbors" mantra, assessing potential risk for the people we work with and serve in all decisions.

#### **VALUES**

The following values were also expressed in the creation of these guidelines.

# **SAMPLE Oath of Personal Responsibility**[NONPROFIT NAME]

\_, am aware of the potential spread of COVID-19 that could result in severe illness and potential death. Therefore, I will, to the best of my ability, practice proper social distancing at work and outside of the office as recommended by health department directives. as well as practice good hygiene (handwashing, use of hand sanitizer, wearing of a mask when required, etc.) and follow other health recommendations. Should I become ill, I promise to self-report the illness and contact my nonprofit to let them know of my condition. I will adhere to testing guidelines and work with my own primary care providers. Finally, if I am exposed or suspected to be exposed to COVID-19, I will self-quarantine and notify my nonprofit.

- Put your mission, vision and values front and center in your approach to reopening. Consider the impacts on staff, volunteers, clientele and constituents.
- Approach decision-making with an eye for cultural competency, diversity, equity and inclusion.
   Consider repercussions for the most vulnerable of populations and do not put them at undue risk. These include populations such as minorities, persons living in poverty, persons with disabilities, immigrant communities, etc.
- Ask staff, volunteers and others to adhere to an Oath of Personal Responsibility. That would include language about social distancing outside of work, the wearing of masks, personal hygiene and handwashing, volunteer quarantining if necessary and other behaviors to continue flattening the curve and preventing the spread of COVID-19.
- Communicate any new procedures, policies and practices with all staff, volunteers, board members, clientele and constituents to ensure all individuals involved with your mission know what it is expected.
- Follow directions from health officials, experts and departments of health.

#### **GUIDING PRINCIPLES**

Over the next several weeks and months, as areas stabilize from the COVID-19 pandemic and stay-at-home restrictions are lifted, organizations will begin to bring workers back into the physical workplace. It's already begun in some parts of the world. The migration of a furloughed and Work from Home (WFH) workforce back to places of business will look different for every organization. The mix of returning employees will vary, and in some cases, a segment of the workforce may continue working remotely. One thing is clear, however—the management of the process is without precedent. How can employers ensure they are prepared to receive their workforce—and that their employees are prepared for the return—so that the transition is safe, efficient, effective and aligned to the needs of the organization and the needs of our people?

# What Should Guide Us in our Reopening

#### Readiness Essentials

- 1. Prepare for Re-engagement Office considerations, your staff and your clientele
- 2. Work with and Inform your Board Keep your board apprised
- 3. Communicate with Transparency Let your constituents and the public know your plans
- 4. Engage with Donors Tell the story

Faced with common challenges, nonprofits have a unique opportunity to come together in the true spirit of collaboration. We are already seeing it play out, and we believe there is no better path to successfully manage the complexity of the road that lies ahead.

#### **FINAL THOUGHTS**

First, the World Health Organization (WHO) and Centers for Disease Control (CDC), as well as the respective health departments, should be your primary sources for guidance on COVID-19 and other health-related issues.

Second, while the practices and recommendations in this guide at times reference office environments, they are largely applicable to other types of workforce environments and properties as well as many diverse missions and types of nonprofits.

Finally, the intention of this resource is to establish the foundation of ideas and recommendations upon which we can build—in collaboration with clients and partners—an increasingly useful guide.

# Operations and Workplace Readiness

The first task of any nonprofit as we re-engage is to establish a task force and task force leader that will be responsible for all decisions moving forward. In a small nonprofit. this will obviously be the job of the executive director. In much larger organizations, she/he will put together a staff-led task force. This should include an HR manager, Finance director and four to five other senior staff members to help guide decision-making.

Before returning to the office, do communicate new protocols and procedures BEFORE staff returns to the office. This not only establishes those best practices, but it also shows to your staff the seriousness and care we have in protecting their health and well-being. Additionally, keep the office as sanitized as possible. Consider assigning staff to a task force dedicated to keeping offices clean along with keeping staff up to date on protocols.

In the appendix you will find a comprehensive document from the CDC about spread of coronavirus and ways to mitigate that spread.

#### **Preparing the Workspace for Return**

- Thoroughly clean and sanitize the workspace, particularly common areas, bathrooms and other congregating facilities (lunch rooms or break areas, kitchens, conference rooms).
- Ensure you have cleaning supplies on hand for more active, daily cleaning for the foreseeable future. These include sanitizing wipes, bleach, disinfectant sprays, etc. Order online for best availability of supplies.
- Before staff arrival, assess the space for social distancing (desks six feet apart, use of cubicles, offices). Also look for areas where staff, volunteers or clientele could congregate (waiting rooms, conference rooms, etc.) and assess those spaces for social distancing (while a room may have a capacity of 30, to ensure social distancing is possible, consider changing the capacity to a third or 10 persons).
- Once arrived, enforce a clean desk policy.
- Make cleaning supplies and sanitizers available in all parts of the office.
- You may find that because of spacing issues, your organization might consider only bringing a portion of staff back to the office while others will continue working remotely.
- Follow any and all guidelines for sanitation and social distancing from your local health department.

#### **Ongoing Sanitation and Social Distancing Guidelines**

- Offices should be cleaned daily, especially where people congregate (waiting rooms, conference rooms, bathrooms). You may want to increase professional cleaning and sanitation for these reasons. Remove trash daily.
- Staff should wash hands regularly and should avoid excessive touching of communal surfaces if possible.
- Have disinfecting wipes available in all public areas as well as hand sanitizer.
- Ask staff to remember to also sanitize their own desks, equipment and office areas on a regular basis (at least daily) to prevent spread of germs. Also, sanitize common equipment (copiers, projectors, monitors, etc.) daily if multiple people are using it.

- Routinely clean and disinfect all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, and doorknobs.
- If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection.
- For disinfection, most common EPA-registered household disinfectants should be effective. Follow the manufacturer's instructions for all cleaning and disinfection products (e.g., concentration, application method and contact time, etc.).
- Discourage workers from using other co-workers' phones, desks, offices, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.
- 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 employees before each use. To disinfect, use products that meet the Environmental Protection Agency's criteria for use against COVID-19, and are appropriate for the surface.
- Use good judgement on sanitation and let all staff and volunteers know your internal procedures for cleaning to set expectations and alieve concerns.
- Nonprofits are full of huggers and hand-shakers. It will be hard, but we must avoid physical contact.
- If you do not require masks at work, please be sure to remind people of "respiratory etiquette" that includes covering a cough or sneeze, using and throwing away tissues, etc.
- Place signage in bathrooms to wash hands along with signage to remind people of social distancing and etiquette.
- When in doubt, do not put groups of people into hygienically compromising situations.
- Don't assume everyone understands hygienic concepts. You will find yourself in situations with some clientele who will need instruction, reminding and assistance with some basic tasks such as hand-washing, sanitizing, etc.

# • Consider the following social distancing suggestions to avoid unnecessary exposure:

- Implementing flexible worksites (e.g., telework)
- Implementing flexible work hours (e.g., staggered shifts)
- Increasing physical space between employees at the worksite
- Increasing physical space between employees and customers
- Implementing flexible meeting and travel options (e.g., postpone non-essential meetings or events)
- Downsizing operations
- Delivering services remotely (e.g. phone, video, or web)
- Delivering products through virtual and/or digital platforms
- Relying less on paper that is passed around the office.

#### **Food Handling**

- At first, you might require limited or no communal food in the office or organization. This could mean a requirement that all employees and volunteers bring their own meals or eat off site. We recommend avoiding potluck style meals or open, self-serve buffets, up to and including communal coffee service, for the time being.
- You might consider for a period of time asking all employees to eat alone to preserve social distancing.
- Your organization may also restrict how much communal food is left in refrigerators or communal cupboards.
- For any food prepared and served for clientele, all nonprofits should follow local health department guidelines. Additionally, the FDA has produced a set of guidelines for communal food preparation and service. (https://www.fda.gov/food/food-safety-during-emergencies/food-safety-and-coronavirus-disease-2019-covid-19)
- If you do serve any food at your offices, facilities, houses of worship, etc., remember that appetizers, hors d'oeuvres, food, and/or all beverages, including water, tea, wine, beer and/or adult beverages, should not be self-served. All food and beverages should be served from service staff that are wearing appropriate PPE to reduce any contamination. Organizations should not provide any buffets, tables with appetizers, and/or any self-serve wine and/or beverages to staff and/or attendees.

#### **Protocols for Public Opening and Closure**

- While your office may be ready to bring back employees and volunteers, your organization may not be accepting public appointments. Ensure you communicate on doors, your website and social media when public hours may resume.
- Inform employees about who is allowed in the building and who should not enter. This could include family members or friends of employees, donors, volunteers, etc.
- Let employees and volunteers know when the organization can receive visitors or the public.
- If you do receive the public, ensure signs about hygiene and disease prevention protocols are visible and accessible. If you reguarly work with clientele where English is not a first language, translate those into the appropriate languages.
- For contact-tracing purposes have ALL visitors sign in when they enter. That information may be necessary for local health departments.
- Regular visitors (including board, committee members, volunteeers, clientele, etc. should all read and/or sign the "Oath of Personal Responsibility."
- If you have mail services forwarded or collected, be sure to contact the USPS to ensure mail is delivered when ready.

# **Human Resources Considerations**

#### **Human Resources and Staffing**

- Once your office return is assessed and determined, organizational leadership should meet to discuss which staff should return to the office and when.
- These decisions should be very flexible, as you will not only have to consider staffing needs but also potential accommodations for some staff in certain categories.
- You might decide to give immediate accommodations to staff with known compromises to their health or those in high-risk health categories, age or disability.
- Be open to some staff requests for continued work remotely privileges, particularly those in higher-risk health categories.
- Familiarize yourself with the provisions in the Families First Coronavirus Response Act (FFCRA) and establish a procedure for accommodating requests for leave or accommodations requested by employees. (A copy of a sample procedure is in the addendum of this booklet.)
- Ensure you have communicated any new procedures and protocols to all returning staff members.
- Leadership and Human Resources should establish protocols for any employees requesting further work from home, accommodations or exceptions.
- You may continue (for the time being) work remotely plans for those who can effectively do their jobs away from the office to lower physical capacity and increase social distancing at the office or facility.
- Familiarize yourselves and your staff of all "paid-time-off" policies including vacation, sick leave, work remotely and provisions from the FFCRA.
- Ensure that sick leave policies are flexible and consistent with public health guidance and that employees are aware of and understand these policies.
- Maintain flexible policies that permit employees to stay home to care for a sick family member or take care of children due to school and childcare closures. Additional flexibilities might include giving advances on future sick leave and allowing employees to donate sick leave to each other.
- Employers that do not currently offer sick leave to some or all of their employees may want to draft non-punitive "emergency sick leave" policies.

Your staff and volunteers are the lifeblood of your nonprofit mission. A number of issues will arise as you bring staff back into offices and facilities. We highly recommend that you follow SHRM best practices and guidelines, as well as seek counsel with HR attorneys and professionals as you go through this process.

- Employers should not require a positive COVID-19 test result or a healthcare provider's note for employees who are sick to validate their illness, qualify for sick leave, or to return to work. Healthcare provider offices and medical facilities may be extremely busy and not able to provide such documentation in a timely manner.
- Your organization may wish to ask staff to take their temperatures. Any staff member who expresses any symptoms of COVID-19 or serious respiratory issues should leave the location immediately and go home.
- Provide access to testing or resources where employees can find testing.
- Review human resources policies to make sure that policies and practices are consistent with public health recommendations and are consistent with existing state and federal workplace laws (for more information on employer responsibilities, visit the Department of Labor and the Equal Employment Opportunity websites.
- Connect employees to employee assistance program (EAP) resources (if available) and community resources as needed. Employees may need additional social, behavioral, and other services, for example, to cope with their work with the field and/ or with the death of a loved one.
- Plan for staff absences. Staff need to stay home when they are sick, or they may need to stay home to care for a sick household member or care for their children in the event of school dismissals.
- Identify critical job functions and positions and plan for alternative coverage by cross-training staff (similar to planning for holiday staffing). Provide instructions about how and when to safely return to work.

#### Anxiety, Depression and Other Mental Health Issues

- For most, the COVID-19 quarantine experience has been very concerning, and some individuals will report significant anxiety, fear and reticence about re-entering the workplace. Organizations should not be dismissive or judgmental about this anxiety.
- It is important that staff members should have some avenue to express concerns – either with co-workers, leadership, an established employee, an Employee Assistance Program, or other outlet.
- Leadership, management and co-workers should be ready to work with staff members and volunteers in an **empathetic and trauma-informed behavior**.
- Remember, trauma and anxiety can manifest in a number of ways. Nonprofits should be ready to also refer employees to professional mental health services should the need arise.
- It is important for nonprofits to understand that this isn't "business as usual" and that we will need to be perceptive and attune to our staff's, volunteers' and clienteles' mental health.

#### Re-Engagement in Phases and Waves

- A larger nonprofit may bring employees back to the office or facility in phases and waves.
- Consider the timing and triggers for those phases back to the office.
- Also consider evaluating each phase as it happens before starting the next. This could be done through surveying or data exploration as well as using data and guidance from outside sources (health data, economic data, etc.).

#### Regression

At any point, there could be a resurgence of the virus, forcing organizations back into quarantine or work remotely situations. Should this occur, follow similar steps to a previous change to your operations. Ensure active and quick communication to your staff, volunteers, clientele and constituents. Have a plan at hand in case you need to move back a step or two in your re-engagement plan.

#### Oath of Personal Responsibility for Staff and Constituents

We have composed a simple "Oath of Personal Responsibility" that all staff, board members, frequent visitors and clientele should adhere to. While not legally binding, it does remind all of us of our responsibilities both inside and outside of the office to practice social distancing, good hygiene and disease detection and management. A sample is below.

## 

# **Board Governance**

Remembering that boards govern, not manage, these are some guiding thoughts of working with your board as your nonprofit re-engages as well lean on their possible resources as nonprofits move forward.

In a crisis, the balance of governing and managing can shift. These are considerations to have while your organization finds its new footing post-COVID-19. This will help your board focus on what needs to happen next.

#### **Board Communication**

- As you begin to re-engage, **inform the board of your plans, phases of re-engagement, etc.** Feel free to share this document with your board so that they understand the direction of re-opening.
- Work with the board chair and chair-elect in partnership with the executive director to ask for any possible assistance or advice through the process, particularly with those board members who are engaged in this process with their own respective companies and employers.
- Through the process, have **regular updates (weekly, typically)** to the board on how things are going.
- Remember, your nonprofit has a full-time job with your mission, and COVID-19-related activities are taking a lot of your time. Keep the board up-to-date on your mission-related activities as well.

#### **Policies and Procedures**

- Through the crisis, you may have had to alter, discontinue or enact policies and procedures as part of a continuation of business plan. On a regular basis, inform and work with board leadership on any other alterations you may need to make.
- Review bylaws and current policies in place before making big decisions in a time of crisis. This way, you are able to potentially give more leadership to an executive committee for emergency decisions.
- Management decisions should continue to be made by the executive director. Governance decisions are made by the board. Executive directors should keep board informed of those major management decisions happening at the staff level.
- Ensure that you have a crisis communications plan in place that establishes the spokesperson of the nonprofit.

#### Other Leadership Responsibilities

- Ensure board and leadership have a firm understanding of any risk, liability and who assumes it. The board should also approve an Emergency and Disaster Plan to mitigate future crises.
- Depending on circumstances, a board may have already or may establish a crisis task force depending on the nature of the business.
- Boards and committees SHOULD continue to meet on a regularly established schedule, and they may consider elongating meetings or having emergency or added meetings as the nonprofit deals with the crisis.

# Communications and Public Relations

#### To the Public

- Depending on your mission, you will want to communicate to the public your intentions about re-engagement. Let them know your general timeline and what to expect.
- This could be a press release, an email or a simple statement on social media and your website.
- As part of that communication, **be transparent** and let them know the processes that guide your decision-making.
- If you are a very public-facing organization that regularly engages the public, be detailed in your protocols to communicate that your organization is enacting the protocols to keep the public safe.
- Establish a "single point of contact" or spokesperson for all media and public relations purposes.

To Staff

- We can't stress enough that communication to staff, board and volunteers should be especially transparent and with as great as detail as necessary.
- Let them know immediately the plans to re-engage and give sufficient notice so that they can make their own accommodations as they begin to transition from working remotely.

#### **Ongoing Communications**

- You may want to devise a plan of ongoing communications for the next several months that focuses on both internal work (staff, board, clientele, etc.) and external work (donors, supporters, general public).
- This is especially important to keep individuals informed about changes in programming or program delivery, protocols or procedures, policy changes, etc.
- Ensure your website and social media communication are up-to-date. Hours of operation may change or you may need to communicate protocols for visitors, etc.

Communication is key in all of our relationships. Whether staff, board, volunteers, clientele, the media or the general public, during a crisis (even one we are all managing), transparency is essential. This is an optimal time to engage our closest allies as we navigate reopening.

# **Events and Donor Relations**

Nonprofits host a number of special events with a cadre of purposes. Below are a number of guidelines for these events that will depend heavily on health department regulations around gathering people together. We suggest nonprofits, performing arts organizations, congregations and other organizations gather groups together continue to follow those guidelines from the local and state health departments to preserve the health and safety of all involved.

#### **Special Events**

- Follow local regulations about the number of people allowed to be together.
- Ensure social distancing tactics are observed.
- Encourage those attending to wear masks and observe their own social distancing techniques.
- For food handling, use licensed caterers and allow no "self-service" type handling.
- Inform all guests of any special protocols in place at events before they attend (mask wearing, social distancing, food, other etiquette you will observe).
- Have contingencies in place in the event of postponement, cancellation, change of plans, etc.
- If you have postponed an event to late summer or fall of 2020, have a cancellation contingency in place.
- Keep donors informed of all contingencies.
- Consider online-only events.
- For performing arts events, see the section on Arts Organizations.
- For small events, work with a restaurant or licensed caterer to provide food. We do not recommend self-catered or "potluck" style group meals, particularly if you are working with individuals in high-risk groups.

#### **Granting or Sponsorship Relationships**

- Communicate with your program officer or community relations director (the person responsible for overseeing your grant or sponsorship) as soon as possible to check in. They want to hear from you.
- Let them know your plans on re-engagement and opening, any changes to program delivery, any changes on deliverables or expectations.
- Provide them information on your financial position and be completely transparent. Emergency grant programs along with various emergency funds have been established around the state.

- Work with them on unrestricting some funds if you're in need.
- Let them know if you successfully applied for and received PPP funding from the Small Business Administration.
- If you are postponing an event, contact donors first and then announce the postponement. Discuss any necessary contingencies about their donation.



# Implementation of Mitigation Strategies for Communities with Local COVID-19 Transmission

### **Background**

When a novel virus with pandemic potential emerges, nonpharmaceutical interventions, which will be called community mitigation strategies in this document, often are the most readily available interventions to help slow transmission of the virus in communities. Community mitigation is a set of actions that persons and communities can take to help slow the spread of respiratory virus infections. Community mitigation is especially important before a vaccine or drug becomes widely available.

The following is a framework for actions which local and state health departments can recommend in their community to both prepare for and mitigate community transmission of COVID-19 in the United States. Selection and implementation of these actions should be guided by the local characteristics of disease transmission, demographics, and public health and healthcare system capacity.

#### Goals

The goals for using mitigation strategies in communities with local COVID-19 transmission are to slow the transmission of disease and in particular to protect:

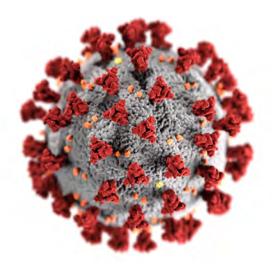
- Individuals at increased risk for severe illness, including older adults and persons of any age with underlying health conditions (See Appendix A)
- The healthcare and critical infrastructure workforces

These approaches are used to minimize morbidity and mortality and the social and economic impacts of COVID-19. Individuals, communities, businesses, and healthcare organizations are all part of a community mitigation strategy. These strategies should be implemented to prepare for and when there is evidence of community transmission. Signals of ongoing community transmission may include detection of confirmed cases of COVID-19 with no epidemiologic link to travelers or known cases, or more than three generations of transmission.

Implementation is based on:

- Emphasizing individual responsibility for implementing recommended personal-level actions
- Empowering businesses, schools, and community organizations to implement recommended actions, particularly in ways that protect persons at increased risk of severe illness
- Focusing on settings that provide critical infrastructure or services to individuals at increased risk of severe illness
- Minimizing disruptions to daily life to the extent possible





### **Guiding principles**

- Each community is unique, and appropriate mitigation strategies will vary based on the level of community transmission, characteristics of the community and their populations, and the local capacity to implement strategies (Table 1).
- Consider all aspects of a community that might be impacted, including populations most vulnerable to severe illness and those that may be more impacted socially or economically, and select appropriate actions.
- Mitigation strategies can be scaled up or down depending on the evolving local situation.
- When developing mitigation plans, communities should identify ways to ensure the safety and social well-being of groups that may be especially impacted by mitigation strategies, including individuals at increased risk for severe illness.
- Activation of community emergency plans is critical for the implementation of mitigation strategies. These plans may provide additional authorities and coordination needed for interventions to be implemented (Table 2).
- Activities in Table 2 may be implemented at any time regardless of the level of community transmission based on guidance on from local and state health officials.
- The level of activities implemented may vary across the settings described in Table 2 (e.g., they may be at a minimal/ moderate level for one setting and at a substantial level for another setting in order to meet community response needs).
- Depending on the level of community spread, local and state public health departments may need to implement mitigation strategies for public health functions to identify cases and conduct contact tracing (Table 3). When applied, community mitigation efforts may help facilitate public health activities like contact tracing

For more information: www.cdc.gov/COVID19

**Table 1. Local Factors to Consider for Determining Mitigation Strategies** 

Factor	Characteristics
Epidemiology	<ul> <li>Level of community transmission (see Table 3)</li> <li>Number and type of outbreaks (e.g., nursing homes, schools, etc.)</li> <li>Impact of the outbreaks on delivery of healthcare or other critical infrastructure or services</li> <li>Epidemiology in surrounding jurisdictions</li> </ul>
Community Characteristics	<ul> <li>Size of community and population density</li> <li>Level of community engagement/support</li> <li>Size and characteristics of vulnerable populations</li> <li>Access to healthcare</li> <li>Transportation (e.g., public, walking)</li> <li>Planned large events</li> <li>Relationship of community to other communities (e.g., transportation hub, tourist destination, etc.)</li> </ul>
Healthcare capacity	<ul> <li>Healthcare workforce</li> <li>Number of healthcare facilities (including ancillary healthcare facilities)</li> <li>Testing capacity</li> <li>Intensive care capacity</li> <li>Availability of personal protective equipment (PPE)</li> </ul>
Public health capacity	<ul> <li>Public health workforce and availability of resources to implement strategies</li> <li>Available support from other state/local government agencies and partner organizations</li> </ul>

Table 2. Community mitigation strategies by setting and by level of community transmission or impact of COVID-19

Potential mitigation activities according to level of community transmission or im			or impact of COVID-19 by setting
Factor	None to Minimal	Minimal to moderate	Substantial
Individuals and Families at Home "What you can do to prepare, if you or a family member gets ill, or if your community experiences spread of COVID-19"	<ul> <li>Know where to find local information on COVID-19 and local trends of COVID-19 cases.</li> <li>Know the signs and symptoms of COVID-19 and what to do if symptomatic:  » Stay home when you are sick  » Call your health care provider's office in advance of a visit  » Limit movement in the community  » Limit visitors</li> <li>Know what additional measures those at highrisk and who are vulnerable should take.</li> <li>Implement personal protective measures (e.g., stay home when sick, handwashing, respiratory etiquette, clean frequently touched surfaces daily).</li> <li>Create a household plan of action in case of illness in the household or disruption of daily activities due to COVID-19 in the community.</li> <li>» Consider 2-week supply of prescription and over the counter medications, food and other essentials. Know how to get food delivered if possible.</li> <li>» Establish ways to communicate with others (e.g., family, friends, co-workers).</li> <li>» Establish plans to telework, what to do about childcare needs, how to adapt to cancellation of events.</li> <li>• Know about emergency operations plans for schools/workplaces of household members.</li> </ul>	<ul> <li>Continue to monitor local information about COVID-19 in your community.</li> <li>Continue to practice personal protective measures.</li> <li>Continue to put household plan into action.</li> <li>Individuals at increased risk of severe illness should consider staying at home and avoiding gatherings or other situations of potential exposures, including travel.</li> </ul>	<ul> <li>Continue to practice personal protective measures.</li> <li>Continue to put household plan into place.</li> <li>All individuals should limit community movement and adapt to disruptions in routine activities (e.g., school and/or work closures) according to guidance from local officials.</li> </ul>

Factor	Potential mitigation activities according to level of community transmission or impact of COVID-19 by setting			
Factor	None to Minimal	Minimal to moderate	Substantial	
"What childcare facilities, K-12 schools, and colleges and universities can do to prepare for COVID-19, if the school or facility has cases of COVID-19, or if the community is experiencing spread of COVID-19)"	<ul> <li>Know where to find local information on COVID-19 and local trends of COVID-19 cases.</li> <li>Know the signs and symptoms of COVID-19 and what to do if students or staff become symptomatic at school/childcare site.</li> <li>Review and update emergency operations plan (including implementation of social distancing measures, distance learning if feasible) or develop plan if one is not available.</li> <li>Evaluate whether there are students or staff who are at increased risk of severe illness and develop plans for them to continue to work or receive educational services if there is moderate levels of COVID-19 transmission or impact.</li> <li>» Parents of children at increased risk for severe illness should discuss with their health care provider whether those students should stay home in case of school or community spread.</li> <li>» Staff at increased risk for severe illness should have a plan to stay home if there are school-based cases or community spread.</li> <li>• Encourage staff and students to stay home when sick and notify school administrators of illness (schools should provide non-punitive sick leave options to allow staff to stay home when ill).</li> <li>• Encourage personal protective measures among staff/students (e.g., stay home when sick, handwashing, respiratory etiquette).</li> <li>• Clean and disinfect frequently touched surfaces daily.</li> <li>• Ensure hand hygiene supplies are readily available in buildings.</li> </ul>	<ul> <li>Implement social distancing measures:         <ul> <li>Reduce the frequency of large gatherings (e.g., assemblies), and limit the number of attendees per gathering.</li> <li>Alter schedules to reduce mixing (e.g., stagger recess, entry/dismissal times)</li> <li>Limit inter-school interactions</li> <li>Consider distance or e-learning in some settings</li> </ul> </li> <li>Consider regular health checks (e.g., temperature and respiratory symptom screening) of students, staff, and visitors (if feasible).</li> <li>Short-term dismissals for school and extracurricular activities as needed (e.g., if cases in staff/students) for cleaning and contact tracing.</li> <li>Students at increased risk of severe illness should consider implementing individual plans for distance learning, e-learning.</li> </ul>	<ul> <li>Broader and/or longer-term school dismissals, either as a preventive measure or because of staff and/or student absenteeism.</li> <li>Cancellation of school-associated congregations, particularly those with participation of high-risk individuals.</li> <li>Implement distance learning if feasible.</li> </ul>	

	Potential mitigation activities according to level of community transmission or impact of COVID-19 by			
Factor	None to Minimal	Minimal to moderate	Substantial	
Assisted living acilities, senior living acilities and adult lay programs What facilities can do o prepare for COVID-19, if the facility has cases of COVID-19, or if the community is experiencing spread of COVID-19)"	<ul> <li>Know where to find local information on COVID-19.</li> <li>Know the signs and symptoms of COVID-19 and what to do if clients/residents or staff become symptomatic.</li> <li>Review and update emergency operations plan (including implementation of social distancing measures) or develop a plan if one is not available.</li> <li>Encourage personal protective measures among staff, residents and clients who live elsewhere (e.g., stay home or in residences when sick, handwashing, respiratory etiquette).</li> <li>Clean frequently touched surfaces daily.</li> <li>Ensure hand hygiene supplies are readily available in all buildings.</li> </ul>	Implement social distancing measures:  Reduce large gatherings (e.g., group socialevents)  Alter schedules to reduce mixing (e.g., stagger meal, activity, arrival/departure times)  Limit programs with external staff  Consider having residents stay in facility and limit exposure to the general community  Limit visitors, implement screening  Temperature and respiratory symptom screening of attendees, staff, and visitors.  Short-term closures as needed (e.g., if cases in staff, residents or clients who live elsewhere) for cleaning and contact tracing.	Longer-term closure or quarantine of facilit     Restrict or limit visitor access (e.g., maximum of 1 per day).	

	Potential mitigation activities according to level of community transmission or impact of COVID-19 by setting			
Factor	None to Minimal	Minimal to moderate	Substantial	
Workplace "What workplaces can do to prepare for COVID-19, if the workplace has cases of COVID-19, or if the community is experiencing spread of COVID-19)"	<ul> <li>Know where to find local information on COVID-19 and local trends of COVID-19 cases.</li> <li>Know the signs and symptoms of COVID-19 and what to do if staff become symptomatic at the worksite.</li> <li>Review, update, or develop workplace plans to include: <ul> <li>Liberal leave and telework policies</li> <li>Consider 7-day leave policies for people with COVID-19 symptoms</li> <li>Consider alternate team approaches for work schedules.</li> </ul> </li> <li>Encourage employees to stay home and notify workplace administrators when sick (workplaces should provide non-punitive sick leave options to allow staff to stay home when ill).</li> <li>Encourage personal protective measures among staff (e.g., stay home when sick, handwashing, respiratory etiquette).</li> <li>Clean and disinfect frequently touched surfaces daily.</li> <li>Ensure hand hygiene supplies are readily available in building.</li> </ul>	<ul> <li>Encourage staff to telework (when feasible), particularly individuals at increased risk of severe illness.</li> <li>Implement social distancing measures:         <ul> <li>Increasing physical space between workers at the worksite</li> <li>Staggering work schedules</li> <li>Decreasing social contacts in the workplace (e.g., limit in-person meetings, meeting for lunch in a break room, etc.)</li> </ul> </li> <li>Limit large work-related gatherings (e.g., staff meetings, after-work functions).</li> <li>Limit non-essential work travel.</li> <li>Consider regular health checks (e.g., temperature and respiratory symptom screening) of staff and visitors entering buildings (if feasible).</li> </ul>	<ul> <li>Implement extended telework arrangements (when feasible).</li> <li>Ensure flexible leave policies for staff who need to stay home due to school/childcare dismissals.</li> <li>Cancel non-essential work travel.</li> <li>Cancel work-sponsored conferences, tradeshows, etc.</li> </ul>	

	Potential mitigation activities according to level of community transmission or impact of COVID-19 by setting			
Factor	None to Minimal	Minimal to moderate	Substantial	
Community and faith-based organizations "What organizations can do to prepare for COVID-19, if the organizations has cases of COVID-19, or if the community is experiencing spread of COVID-19)"	<ul> <li>Know where to find local information on COVID-19 and local trends of COVID-19 cases.</li> <li>Know the signs and symptoms of COVID-19 and what to do if organization members/staff become symptomatic.</li> <li>Identify safe ways to serve those that are at high risk or vulnerable (outreach, assistance, etc.).</li> <li>Review, update, or develop emergency plans for the organization, especially consideration for individuals at increased risk of severe illness.</li> <li>Encourage staff and members to stay home and notify organization administrators of illness when sick.</li> <li>Encourage personal protective measures among organization/members and staff (e.g., stay home when sick, handwashing, respiratory etiquette).</li> <li>Clean frequently touched surfaces at organization gathering points daily.</li> <li>Ensure hand hygiene supplies are readily available in building.</li> </ul>	<ul> <li>Implement social distancing measures:         <ul> <li>Reduce activities (e.g., group congregation, religious services), especially for organizations with individuals at increased risk of severe illness.</li> <li>Consider offering video/audio of events.</li> </ul> </li> <li>Determine ways to continue providing support services to individuals at increased risk of severe disease (services, meals, checking in) while limiting group settings and exposures.</li> <li>Cancel large gatherings (e.g., &gt;250 people, though threshold is at the discretion of the community) or move to smaller groupings.</li> <li>For organizations that serve high-risk populations, cancel gatherings of more than 10 people.</li> </ul>	Cancel community and faith-based gatherings of any size.	

	Potential mitigation activities according to level of community transmission or impact of COVID-19 by setting			
Factor	None to Minimal	Minimal to moderate	Substantial	
Healthcare settings and healthcare provider (includes outpatient, nursing homes/long-term care facilities, inpatient, telehealth) "What healthcare settings including nursing homes/long-term care facilities, can do to prepare for COVID-19, if the facilities has cases of COVID-19, or if the community is experiencing spread of COVID-19)"	<ul> <li>Provide healthcare personnel ([HCP], including staff at nursing homes and long-term care facilities) and systems with tools and guidance needed to support their decisions to care for patients at home (or in nursing homes/long-term care facilities).</li> <li>Develop systems for phone triage and telemedicine to reduce unnecessary healthcare visits.</li> <li>Assess facility infection control programs; assess personal protective equipment (PPE) supplies and optimize PPE use.</li> <li>Assess plans for monitoring of HCP and plans for increasing numbers of HCP if needed.</li> <li>Assess visitor policies.</li> <li>Assess HCP sick leave policies (healthcare facilities should provide non-punitive sick leave options to allow HCP to stay home when ill).</li> <li>Encourage HCP to stay home and notify healthcare facility administrators when sick.</li> <li>In conjunction with local health department, identify exposed HCP, and implement recommended monitoring and work restrictions.</li> <li>Implement triage prior to entering facilities to rapidly identify and isolate patients with respiratory illness (e.g., phone triage before patient arrival, triage upon arrival).</li> </ul>	<ul> <li>Implement changes to visitor policies to further limit exposures to HCP, residents, and patients. Changes could include temperature/ symptom checks for visitors, limiting visitor movement in the facility, etc.</li> <li>Implement triage before entering facilities (e.g., parking lot triage, front door), phone triage, and telemedicine to limit unnecessary healthcare visits.</li> <li>Actively monitor absenteeism and respiratory illness among HCP and patients.</li> <li>Actively monitor PPE supplies.</li> <li>Establish processes to evaluate and test large numbers of patients and HCP with respiratory symptoms (e.g., designated clinic, surge tent).</li> <li>Consider allowing asymptomatic exposed HCP to work while wearing a facemask.</li> <li>Begin to cross train HCP for working in other units in anticipation of staffing shortages.</li> </ul>	<ul> <li>Restrict or limit visitors (e.g., maximum of 1 per day) to reduce facility-based transmission.</li> <li>Identify areas of operations that may be subject to alternative standards of care and implement necessary changes (e.g., allowing mildly symptomatic HCP to work while wearing a facemask).</li> <li>Cancel elective and non-urgent procedures</li> <li>Establish cohort units or facilities for large numbers of patients.</li> <li>Consider requiring all HCP to wear a facemask when in the facility depending on supply.</li> </ul>	

 Table 3. Potential mitigation strategies for public health functions

Public health control activities by level of COVID-19 community transmission				
None to Minimal	Minimal to Moderate	Substantial		
Evidence of isolated cases or limited community transmission, case investigations underway, no evidence of exposure in large communal setting,e.g., healthcare facility, school, mass gathering.	Widespread and/or sustained transmission with high likelihood or confirmed exposure within communal settings with potential for rapid increase in suspected cases.	Large scale community transmission, healthcare staffing significantly impacted, multiple cases within communal settings like healthcare facilities, schools, mass gatherings etc.		
<ul> <li>Continue contact tracing, monitor and observe contacts as advised in guidance to maximize containment around cases.</li> <li>Isolation of confirmed COVID-19 cases until no longer considered infectious according to guidance.</li> <li>For asymptomatic close contacts exposed to a confirmed COVID-19 case, consideration of movement restrictions based on risk level, social distancing.</li> <li>Monitoring close contacts should be done by jurisdictions to the extent feasible based on local priorities and resources.</li> <li>Encourage HCP to develop phone triage and telemedicine practices.</li> <li>Test individuals with signs and symptoms compatible with COVID-19.</li> <li>Determine methods to streamline contact tracing through simplified data collection and surge if needed (resources including staffing through colleges and other first responders, technology etc.).</li> </ul>	<ul> <li>May reduce contact tracing if resources dictate, prioritizing to those in high-risk settings (e.g., healthcare professionals or high-risk settings based on vulnerable populations or critical infrastructure).</li> <li>Encourage HCP to more strictly implement phone triage and telemedicine practices.</li> <li>Continue COVID-19 testing of symptomatic persons; however, if testing capacity limited, prioritize testing of high-risk individuals.</li> </ul>	<ul> <li>May reduce contact tracing if resources dictate, prioritizing to those in high-risk settings (e.g., healthcare professionals or high-risk settings based on vulnerable populations or critical infrastructure).</li> <li>Encourage HCP to more strictly implement phone triage and telemedicine practices.</li> <li>Continue COVID-19 testing of symptomatic persons; however, if testing capacity limited, prioritize testing of high-risk individuals.</li> </ul>		

# Appendix A: Underlying medical conditions that may increase the risk of serious COVID-19 for individuals of any age.

- Blood disorders (e.g., sickle cell disease or on blood thinners)
- **Chronic kidney disease** as defined by your doctor. Patient has been told to avoid or reduce the dose of medications because kidney disease, or is under treatment for kidney disease, including receiving dialysis
- Chronic liver disease as defined by your doctor. (e.g., cirrhosis, chronic hepatitis) Patient has been told to avoid or reduce the dose of medications because liver disease or is under treatment for liver disease.
- Compromised immune system (immunosuppression) (e.g., seeing a doctor for cancer and treatment such as chemotherapy or radiation, received an organ or bone marrow transplant, taking high doses of corticosteroids or other immunosuppressant medications, HIV or AIDS)
- Current or recent pregnancy in the last two weeks
- Endocrine disorders (e.g., diabetes mellitus)
- Metabolic disorders (such as inherited metabolic disorders and mitochondrial disorders)
- Heart disease (such as congenital heart disease, congestive heart failure and coronary artery disease)
- **Lung disease** including asthma or chronic obstructive pulmonary disease (chronic bronchitis or emphysema) or other chronic conditions associated with impaired lung function or that require home oxygen
- **Neurological and neurologic and neurodevelopment conditions** [including disorders of the brain, spinal cord, peripheral nerve, and muscle such as cerebral palsy, epilepsy (seizure disorders), stroke, intellectual disability, moderate to severe developmental delay, muscular dystrophy, or spinal cord injury].

## Families First Coronavirus Response Act (FFCRA) Procedure

**Background:** The Families First Coronavirus Response Act created two paid leave provisions for employers with fewer than 500 employees and public employers with at least one employee. The Emergency Paid Sick Leave (EPSL) provides up to two weeks of paid leave for qualifying reasons. The Emergency Family and Medical Leave Expansion Act (EFMLEA) expands the protections of the Family and Medical Leave Act (FMLA) to provide paid benefits in certain situations.

**Exemptions:** Employers of health care providers or emergency responders may elect not to provide this leave to those specific employees. Businesses with fewer than 50 employees are exempt from FMLA private causes of action under the Emergency Family and Medical Leave Expansion Act (EFMLEA), but <u>not</u> Department of Labor enforcement. Additionally, small businesses with fewer than 25 employees may be exempt from providing Emergency Paid Sick Leave (EPSL) and Emergency Family and Medical Leave Expansion Act (EFMLEA) if the leave request is because of the child's school or child care provider is closed due to COVID-19 related reasons and would cause an undue hardship on the organization. Also, small businesses with fewer than 25 employees may be exempt from reinstatement rights following an EFMLEA leave due to negative business or operational changes.

#### Statement of Procedure

This procedure is in place for Oklahoma Center for Nonprofits to comply with the requirements of the Federal Families First Coronavirus Response Act (FFCRA). The FFCRA provides employees with Emergency Paid Sick Leave (EPSL) and Emergency Family and Medical Leave Expansion Act (EFMLEA) for those affected by the COVID-19 pandemic, from April 1, 2020 through December 31, 2020.

### Two Types of Leave Covered Under FFCRA

### 1) Emergency Paid Sick Leave (EPSL)

Emergency paid sick leave will be available for an employee who is unable to work or work remotely because:

- 1. The employee is subject to a governmental quarantine or isolation order related to COVID-19;
- 2. The employee has been advised by a health care provider to self-quarantine due of COVID-19 concerns;
- 3. The employee is experiencing symptoms of COVID-19 and is seeking a medical diagnosis;
- 4. The employee is caring for an individual (does not have to be a family member) subject to governmental quarantine/isolation order or health care provider recommendation:
- 5. The employee is caring for an eligible son or daughter under age 18 whose school or place of care is closed due to COVID-19 precautions; or
- 6. The employee is experiencing any other substantially similar condition as specified by the Secretary of Health and Human Services.

#### **Eligibility for EPSL**

All employees, regardless of their tenure with the organization, with full-time or part-time status are eligible to receive this benefit.

#### **Paid Benefits for EPSL**

Eligible employees will receive up to two weeks of paid sick leave.

- Full-time employees (scheduled to work 40 or more hours per week): 80 hours at their regular rate of pay, subject to caps and reasons noted below.
- Part-time employees (scheduled to work less than 40 hours per week): the number of hours that the employee works, on average, over a two week period, subject to caps and reasons noted below.

Payments are capped at \$511 a day (\$5,110 in total) for dealing with an employee's own illness or quarantine (reasons 1, 2 and 3 above). Employees who are caring for an individual affected by COVID-19 and those whose children's schools or childcare providers have closed (reasons 4, 5 and 6 above) receive up to two-thirds of their pay, and that benefit is limited to \$200 a day (\$2,000 in total).

#### **Return to Work Following EPSL**

Employees are required to follow guidelines established by the Centers for Disease Control and Prevention as it relates to ceasing home isolation practices.

- If you will not have a test to determine if you are still contagious, you can leave home after these three
  things have happened:
  - You have had no fever for at least 72 hours (that is three full days of no fever without the use medicine that reduces fevers)
     AND
  - other symptoms have improved (for example, when your cough or shortness of breath have improved)
     AND
  - o at least 7 days have passed since your symptoms first appeared
- If you will be tested to determine if you are still contagious, you can leave home after these three things have happened:
  - You no longer have a fever (without the use medicine that reduces fevers)
     AND
  - other symptoms have improved (for example, when your cough or shortness of breath have improved)
     AND
  - o you received two negative tests in a row, 24 hours apart.

### 2) Emergency Family and Medical Leave Expansion Act (EFMLEA)

Employees will be entitled to take up to 12 weeks of leave if an employee is unable to work <u>or work remotely</u> due to caring for the employee's minor child because the child's school or child care provider has been closed because of COVID-19.

#### **Eligibility for EFMLEA**

Under EFMLEA, full-time and part-time employees who have been on Oklahoma Center for Nonprofits payroll for 30 calendar days, prior to taking the leave, are eligible for leave.

#### **Paid Benefits for EFMLEA**

The EFMLEA provides for a combination of unpaid and paid leave.

- The first 10 days of EFMLEA may be unpaid. An employee may choose to take an existing pay benefit (i.e. PTO, vacation, sick pay) during the 10-day unpaid period, or the 10 days may be paid under Emergency Paid Sick Leave (EPSL), if taken for a qualifying reason.
- After ten days of unpaid leave, employees are entitled to 10 weeks of leave at two-thirds their usual pay.
   Part-time employees are entitled to be paid two-thirds of their usual pay based on the average number of hours worked for the six months prior to taking the leave.
- The cap of the paid leave entitlement for employees is \$200 per day (\$10,000 in the aggregate).

### Notifying Company of the Need for FFCRA Leave

Employees should request their need for emergency paid leave as soon as possible, by notifying their immediate supervisor and human resources of the specific qualifying reason and date of requested leave. If an employee is incapacitated, the employee's representative should give verbal notice as soon as possible. Calling in "sick" does not qualify as adequate notice. An employee must provide sufficient information regarding the reason for an absence for the company to know that protection and benefits may exist under FFCRA.

### **Required Documentation**

IRS guidance outlines the information an eligible employer must receive from an employee and maintain to substantiate eligibility for sick leave or family leave credits.

The employee must provide:

- His or her name.
- The date or dates for which leave is requested.
- A statement of the COVID-19 reason the employee is requesting leave and written support for such reason.
- A statement that the employee is unable to work, including by means of telework, for such reason.

In the case of a leave request based on a quarantine order or self-quarantine advice, the statement from the employee should include the name of the governmental entity ordering quarantine or the name of the health care professional advising self-quarantine. If the person subject to quarantine is not the employee, that person's name and relation to the employee shall be provided.

If a school closes or child care provider is unavailable, the statement from the employee should include:

- The name and age of the child or children.
- The name of the school that has closed or place of care that is unavailable.
- A representation that no other person will be providing care for the child during the period for which the employee is receiving family medical leave.
- With the care of a child older than 14 during daylight hours, a statement that special circumstances
  exist requiring the employee to provide care.

### **Insurance Benefit Continuation During FFCRA Leave**

Coverage under group health insurance will continue while on leave, but employees must continue to pay their portion of the premium. Other employment benefits will also be continued during the leave, as long as the employee continues to pay any required contribution. Payment arrangements will be discussed with individuals as needed.

#### **Certification for FFCRA Leave**

Generally, the company will require certification to verify the qualifying reason for the leave. Employees should be prepared to provide documentation such as a copy of the individual's quarantine or isolation order, or written note by a health care provider advising self-quarantine, or a notice of closure of school or childcare provider (i.e. email, notification on website, or news article).

We understand that requesting healthcare provider documentation may place additional burdens on our medical community during this pandemic, therefore if an employee is unable to obtain this documentation, at a minimum, the name, address, and phone number of your treating healthcare provider must be provided. Oklahoma Center for Nonprofits also reserves the right to request additional documentation completed by your healthcare provider or childcare provider (as applicable) in situations where there is reason to believe an employee has fraudulently obtained leave or paid benefits.

#### **Intermittent Leave**

Intermittent leave will be permitted if the employee is unable to work his or her normal schedule of hours. The employee and employer will come to an agreement on a schedule that provides for the least amount of disruption to an employee's job. For EFLMEA purposes, the total amount of leave taken should not exceed the 12 weeks defined earlier in this procedure.

### **Rights Upon Return from FFCRA Leave**

An employee who takes leave under FFCRA may be reinstated to the same job or an equivalent position upon completion of the leave\*. If an individual has exhausted all leave under this FFCRA and is still unable to return to work, the situation will be reviewed on a case-by-case basis to determine what rights and protections might exist.

The law provides that an employee has no greater rights upon a return from leave than the individual would have had if s/he had continued to work. Therefore, an employee may be affected by a layoff, reorganization, furlough,

change in job duties or other change in employment if the action would have occurred had the employee remained actively at work.

\*Under the EFMLEA portion of FFCRA, employers with less than 25 employees may be excluded from restoring the employee to his or her previous position if all four of the following hardship conditions exist:

- The position no longer exists due to economic or operating conditions that affect employment and due to COVID-19 related reasons during the period of the leave;
- The company made reasonable efforts to restore the employee to the same or an equivalent position;
- The company makes reasonable efforts to contact the employee if an equivalent position becomes available; and
- The company continues to make reasonable efforts to contact the employee for one year beginning either
  on the date the leave related to COVID-19 reasons concludes or the date 12 weeks after the leave began,
  whichever is earlier.