

COVID-19 Preparedness Plan for Windsor Companies

Windsor Companies is committed to providing a safe and healthy workplace for all our workers and customers, clients, patrons, guests and visitors. To ensure we have a safe and healthy workplace, **Windsor Companies** has developed the following COVID-19 Preparedness Plan in response to the COVID-19 pandemic. Managers and workers are all responsible for implementing this plan. Our goal is to mitigate the potential for transmission of COVID-19 in our workplaces and communities, and that requires full cooperation among our workers and management. Only through this cooperative effort can we establish and maintain the safety and health of all persons in our workplaces.

The COVID-19 Preparedness Plan is administered by **Steven Oelrich – Safety Compliance Liaison**, who maintains the overall authority and responsibility for the plan. However, management and workers are equally responsible for supporting, implementing, complying with and providing recommendations to further improve all aspects of this COVID-19 Preparedness Plan. Windsor Companies managers and supervisors have our full support in enforcing the provisions of this plan.

Our workers are our most important assets. **Windsor Companies** is serious about safety and health and protecting its workers. Worker involvement is essential in developing and implementing a successful COVID-19 Preparedness Plan. We have involved our workers in this process by **conducting an initial COVID-19 meeting/discussion involving Lawn Enhancement and Landscape Construction personnel with behavioral guidelines and mask distribution. We have also placed an emphasis on continued communication regarding updates and changes to policies with employees as information and regarding the transmission and characteristics of COVID 19 from the CDC have evolved. Lastly, weekly management meetings have addressed plans, protocol initiation, and amendments throughout the pandemic.**

Windsor Companies COVID-19 Preparedness Plan follows the industry guidance developed by the state of Minnesota, which is based upon Centers for Disease Control and Prevention (CDC) and Minnesota Department of Health (MDH) guidelines for COVID-19, Minnesota Occupational Safety and Health Administration (MNOSHA) statutes, rules and standards, and Minnesota's relevant and current executive orders. It addresses:

- ensuring sick workers stay home and prompt identification and isolation of sick persons;
- social distancing – workers must be at least six-feet apart;
- worker hygiene and source controls;
- workplace building and ventilation protocol;
- workplace cleaning and disinfection protocol;
- drop-off, pick-up and delivery practices and protocol; and
- communications and training practices and protocol.

Windsor Companies has reviewed and incorporated the industry guidance applicable to our business provided by the state of Minnesota for the development of this plan, including the following industry guidance for Construction. Other conditions and circumstances included in the industry guidance and addressed in the plan that are specific to our business include:

- additional protections and protocols for customers, clients, guests and visitors;
- additional protections and protocols for personal protective equipment (PPE);
- additional protections and protocol for access and assignment;
- additional protections and protocol for sanitation and hygiene;
- additional protections and protocols for work clothes and handwashing;
- additional protections and protocol for distancing and barriers;
- additional protections and protocols for managing occupancy;
- additional protocols to limit face-to-face interaction;
- additional protections for receiving or exchanging payment; and
- additional protections and protocols for certain types of businesses within an industry.

Ensure sick workers stay home and prompt identification and isolation of sick persons

Workers have been informed of and encouraged to self-monitor for signs and symptoms of COVID-19. The following policies and procedures are being implemented to assess workers' health status prior to entering the workplace and for workers to report when they are sick or experiencing symptoms.

***Any Windsor employee demonstrating COVID 19 symptoms will call office or crew foreman indicating symptoms. The employee will remain away from work, self-quarantining, until they are symptom free and a negative COVID 19 test result can be provided by a qualified physician. Windsor Companies provides a list of free testing locations for employees upon request.**

***Windsor employees demonstrating COVID 19 symptoms on a jobsite will report directly to foremen and begin a self-quarantine until they are symptom free and a negative COVID 19 test result can be provided from a qualified physician. If the employee does not have transportation on the jobsite, they will remain isolated and properly self-distanced until transportation can be arranged by the employee.**

Windsor Companies has implemented leave policies that promote workers staying at home when they are sick, when household members are sick, or when required by a health care provider to isolate or quarantine themselves or a member of their household. **For any Windsor employee demonstrating symptoms of COVID 19 and self-quarantining while seeking COVID 19 testing, Windsor Companies will provide compensation for the employee for two-thirds of the hourly wage for up to two weeks in accordance with the parameters stipulated in the Payroll Protection Plan.** Accommodations for workers with underlying medical conditions or who have household members with underlying health conditions have been implemented. **Windsor employees with underlying conditions or family members with underlying health conditions have been given the option of working remotely if possible. All Windsor office staff members have more than a six-foot distance between**

working areas. Lastly, employees with underlying conditions are encouraged to wear masks and keep workstations sanitized while maintaining appropriate social distancing.

Windsor Companies has also implemented a policy for informing workers if they have been exposed to a person with COVID-19 at their workplace and requiring them to quarantine until a negative COVID 19 test can be provided by a qualified physician.

Windsor employees who test positive for COVID-19 and have symptoms should stay isolated at home and away from others in the house until all three of the following are true:

- *Symptoms have improved; AND
- *At least 10 days have passed since symptoms first appeared; AND
- *At least 24 hours have passed without fever, without using fever-reducing medications.

Employees who test positive for COVID-19, but do not have symptoms, must stay isolated at home and away from other people in the house for 10 days from their testing date.

Windsor Companies will compensate employees who have tested positive for COVID 19 2/3 of their hourly wage for the 10-day duration of the absence in accordance with the parameters stipulated in the Payroll Protection Plan.

Windsor Companies Seasonal Snow Employees who are demonstrating COVID 19 symptoms will report to supervisor and begin a self-quarantine until they are symptom free and a negative COVID 19 test result can be provided from a qualified physician.

Windsor Companies Seasonal Snow Employees who test positive for COVID 19 and have symptoms should stay isolated at home and away from others in the house until all three of the following are true:

- *Symptoms have improved; AND
- *At least 10 days have passed since symptoms first appeared; AND
- *At least 24 hours have passed without fever, without using fever-reducing medications.

Employees who test positive for COVID-19, but do not have symptoms, must stay isolated at home and away from other people in the house for 10 days from their testing date.

Windsor Companies will compensate Seasonal Snow Employees who have tested positive for COVID 19 2/3 of their hourly wage for an eight-hour workday for each day of snow removal during the 10-day quarantine in accordance with the parameters stipulated in the Payroll Protection Plan.

Any Windsor employee who has tested positive for COVID-19, is symptom free, and can provide a negative test result, may return to work without fulfilling the 10-day isolation period.

In addition, a policy has been implemented to protect the privacy of workers' health status and health information **by adhering to the standards outlined in in relation to COVID 19 and HIPPA at:**

<https://www.hhs.gov/hipaa/for-professionals/special-topics/hipaa-covid19/index.html>

Social distancing – Workers must be at least six-feet apart

Social distancing of at least six feet will be implemented and maintained between workers in the workplace and on jobsites through the following engineering and administrative controls:

- *Windsor employees are given the option of working from home if necessary.**
- *Windsor Companies has and may continue to conduct virtual meetings for those employees with underlying conditions or family members with underlying conditions. Windsor Companies conducts management meetings with at least six feet of social distancing recognition.**
- *All Windsor Companies office workstations are at least six feet apart recognizing social distancing protocols.**
- *Only one Windsor employee to utilize restroom facilities at a time.**
- *Only one Windsor employee can use the copier at a time.**
- *All common use areas in the office are disinfected every morning. Windsor drivers are instructed to disinfect vehicles each morning with a provided bleach solution, spray bottle, and shop towels.**
- *Any Windsor employees riding together in a Windsor vehicle are required to wear masks.**
- *All necessary PPE (including masks and bandanas) are provided to Windsor employees. Moreover, an initial meeting was conducted regarding the appropriate use of masks and the importance of social distancing on the job.**

Worker hygiene and source controls

Basic infection prevention measures are being implemented at our workplaces at all times. Workers are instructed to wash their hands for at least 20 seconds with soap and water frequently throughout the day, but especially at the beginning and end of their shift, prior to any mealtimes and after using the restroom. All customers, clients, patrons, guests and visitors to the workplace are provided hand sanitizer at the reception desk.

In addition, Windsor companies has implemented the following to address hygiene and source controls:

- *All Windsor field employees are provided with the appropriate PPE including washable masks.**
- *All common use areas at Windsor Companies office facility are sanitized every morning.**
- *All restroom supplies are regularly monitored and continually stocked daily.**
- *Paper towel dispensers are provided throughout the office and shop to encourage proper sneeze and coughing etiquette accompanied by touch free garbage receptacles.**
- *All Windsor drivers are provided with bleach solution, spray bottle, and shop towels to adequately disinfect vehicles each morning.**

Windsor employees 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, particularly their mouth, nose and eyes, with their hands. **Windsor employees** are expected to dispose of tissues in provided trash receptacles and wash or sanitize their hands immediately afterward. Respiratory etiquette will be demonstrated on posters and supported by making tissues and trash receptacles available to all workers and other persons entering the workplace.

Workplace building and ventilation protocol

Operation of the building in which the workplace is located, includes necessary sanitation, assessment and maintenance of building systems, including water, plumbing, electrical, and heating, ventilation and air conditioning (HVAC) systems. **Windsor companies is regulating and changing air filters on a scheduled basis to ensure healthy air quality within the office.** The maximum amount of fresh air is being brought into the workplace, air recirculation is being limited, and ventilation systems are being properly used and maintained. Steps are also being taken to minimize air flow blowing across people. **When temperatures permit, windows and doors are opened throughout the office to encourage a fresh outdoor air flow.**

Workplace cleaning and disinfection protocol

Regular practices of cleaning and disinfecting have been implemented, including a schedule for routine cleaning and disinfecting of work surfaces, equipment, tools and machinery, vehicles and areas in the work environment, including restrooms, break rooms, lunch rooms, meeting rooms, checkout stations, fitting rooms, and drop-off and pick-up locations. Frequent cleaning and disinfecting is being conducted of high-touch areas, including phones, keyboards, touch screens, controls, door handles, elevator panels, railings, copy machines, credit card readers, delivery equipment, etc.

***All common use areas at Windsor Companies office facility are sanitized every morning including door handles, copier, key location for drivers, water cooler, microwave, and other common use areas.**

***All Windsor drivers are provided with bleach solution, spray bottle, and shop towels to adequately disinfect vehicles each morning.**

***Windsor office staff members have been provided sanitation wipes for their workspace and encouraged to sanitize daily.**

Appropriate and effective cleaning and disinfecting supplies have been purchased and are available for use in accordance with product labels, safety data sheets and manufacturer specifications, and are being used with required personal protective equipment for the product.

Drop-off, pick-up and delivery practices and protocol

- *Windsor delivery drivers must maintain a six feet distance during drop-offs, pick-ups, and deliveries.
- *Windsor delivery drivers must minimize unnecessary exchanging or sharing of scanners, pens, or other tools while making deliveries.
- *Windsor office and shop staff will receive deliveries in a contactless method, when possible.
- *A six-foot social distancing protocol is followed for visitors in the reception area and hand sanitizer is provided.

Communications and training practices and protocol

This COVID-19 Preparedness Plan was communicated **via email** to all workers on **July 23, 2020** and all necessary information was provided. Additional communication and training will be ongoing **via email and phone contact for anyone experiencing COVID 19 symptoms or an employee who has been in contact with someone with a positive COVID 19 test.** Information will be provided to all workers who did not receive the initial training and prior to initial assignment or reassignment.

Instructions will be communicated to all workers, including employees, temporary workers, staffing and labor-pools, independent contractors, subcontractors, vendors and outside technicians about protections and protocols, including: 1) social distancing protocols and practices; 2) drop-off, pick-up, delivery and general in-store shopping; 3) practices for hygiene and respiratory etiquette; 4) recommendations or requirements regarding the use of masks, face-coverings and/or face-shields by workers. **All Windsor employees will also be advised not to enter the workplace if they are experiencing symptoms or have contracted COVID-19.**

Managers and supervisors are expected to monitor how effective the program has been implemented. **Windsor Companies management will evaluate the effectiveness of strategies and protocols implemented and make any necessary amendments to protect the well-being of all Windsor employees.** All management and workers are to take an active role and collaborate in carrying out the various aspects of this plan, and update the protections, protocols, work-practices and training as necessary. This COVID-19 Preparedness Plan has been certified by **Windsor Companies** management and the plan was posted throughout the workplace and made readily available to employees. It will be updated as necessary by **Steven Oelrich, Safety Compliance Liaison.**

Additional protections and protocols

Other conditions and circumstances addressed in this plan that are specific to our business include: **all Windsor Employees following external COVID 19 plans and policies determined by General Contractors on jobsites where Windsor Landscape Construction employees are working or any properties where Windsor Landscape Maintenance and Enhancement crews are working.**

Additional protocols for the use of face coverings

1. **Windsor's Operations Manager and Windsor Foreman will** evaluate work activities to ensure social distancing can be maintained and identify those activities where social distancing is difficult to maintain to determine if they can be done in an alternative way. Work activities must not be performed if adequate protective measures cannot be implemented.
2. **Windsor employees** must wear face coverings that covers their mouth and nose in accordance with Executive Order 20-81. This Executive Order requires everyone—including workers—to wear a face covering in indoor businesses and indoor public spaces. Additionally, the Executive Order requires workers to wear face coverings when working in outdoor settings in situations where social distancing (*i.e.*, keeping at least 6 feet of physical distance from other individuals not in the same household) cannot be maintained.

This Executive Order includes exemptions for people who are unable to wear or tolerate a face covering due to medical or mental health condition or other reasons—such as when wearing a face covering would create a job hazard. There are also situations in which a face covering may be temporarily removed. More information about face covering requirements and exemptions is available on the MDH website at

The following individuals are exempt from the face covering requirements of E.O. 20-81:

* Individuals with a medical condition, mental health condition, or disability that makes it unreasonable for the individual to maintain a face covering. This includes, but is not limited to, individuals who have a medical condition that compromises their ability to breathe, and individuals who are unconscious, incapacitated, or otherwise unable to remove a face covering without assistance.

*Individuals when wearing a face covering would create a job hazard for the individual or others, as determined by local, state or federal regulators or workplace safety and health standards and guidelines.

3. Windsor workers are instructed to:

*Maintain an adequate number of face-coverings during their shift or work-day that allows the worker to exchange face-coverings as they become saturated, dirty, or compromised during use.

*Launder reusable face coverings before each daily use according to CDC guidelines at Use of Cloth Face Coverings to Help Slow the Spread of COVID-19.

4. Windsor Companies has taken reasonable steps to ensure that workers, customers, clients and visitors wear face coverings in accordance with Executive Order 20-81, and conspicuously post face covering policies for workers, customers, clients and visitors. Cloth face coverings are NOT a substitute for maintaining a physical distance of 6-feet from other people.

***All Windsor employees were provided washable face masks and bandanas with additional supplies available if necessary.**

***All clients, customers, and visitors are offered hand sanitizer and complimentary face coverings in the reception area.**

5. Windsor employees involved in team-driving wear face-coverings at all times while inside the vehicle in accordance with Executive Order 20-81.

6. Ensure all persons, including customers, clients, and visitors bring their own face coverings, or offer face coverings for use.

*** All clients, customers, and visitors are offered hand sanitizer and complimentary face coverings in the reception area.**

7. Establish a protocol for accommodating workers who cannot wear a face covering due to a medical condition, mental health condition, or disability. Businesses must comply with applicable law, including civil rights laws, relating to verification of a worker's disability or medical condition.

*** If a Windsor Employee is unable to use a face covering due to a medical condition**, mental health condition, or disability, then **Windsor Companies will engage** with the worker to identify and implement alternative protections as to ensure the worker, as well as other customers, visitors, and workers, maintain a similar level of protection.

8. Windsor Field Operations Manager and Windsor Foremen will address instances where the use of a face-covering may present a hazard to the worker, and identifying and implementing alternatives to minimize the risk to the worker. However, the business must work to identify and implement alternative protections as to ensure the worker, as well as customers, visitors, and other workers, maintain a similar level of protection whenever possible for:

*environments involving extreme temperatures (e.g. heat, cold) and/or wet environments (e.g. wet processes, rain), face shields may be used in lieu of face-coverings.

*work-activities that may present a risk of entanglement, businesses must ensure the machine/tool is properly guarded as to eliminate the risk of the face-covering becoming entangled into the machine/tool, and that the selection and use of the face-covering protects the worker from the risk of entanglement (e.g. using ear-loops instead of tie-backs).

*work-activities that may present a risk of hazardous chemicals becoming absorbed and/or saturated within the materials of face-covering, the use of engineering controls (e.g. ventilation), administrative controls (e.g. work-practices), or personal protective equipment (e.g. respiratory protection) must be considered and implemented whenever possible.

9. **Windsor Companies can establish** a protocol for accommodating customers, clients and visitors who cannot wear a face covering due to a medical condition, mental health condition, or disability. Businesses may not require customers to provide proof of a medical condition mental health condition, or disability, or require customers to explain the nature of their conditions or disability.

10. **Windsor Companies has established a** protocol for customers, clients and visitors who refuse to wear a face covering where wearing a face covering is required. **Windsor Companies** may refuse entry or services to customers, clients, or visitors who refuse to wear a face covering when required by Executive Order 20-81or when otherwise required by the business even if not required by the Executive Order.

Certified by:

Terry Childers – President Windsor Companies

February 3, 2021

Appendix A – Guidance for developing a COVID-19 Preparedness Plan

General

Centers for Disease Control and Prevention (CDC): Coronavirus (COVID-19) – www.cdc.gov/coronavirus/2019-nCoV

Minnesota Department of Health (MDH): Coronavirus – www.health.state.mn.us/diseases/coronavirus

State of Minnesota: COVID-19 response – <https://mn.gov/covid19>

Businesses

CDC: Resources for businesses and employers – www.cdc.gov/coronavirus/2019-ncov/community/organizations/businesses-employers.html

CDC: General business frequently asked questions – www.cdc.gov/coronavirus/2019-ncov/community/general-business-faq.html

CDC: Building/business ventilation – www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html

MDH: Businesses and employers: COVID-19 – www.health.state.mn.us/diseases/coronavirus/businesses.html

MDH: Health screening checklist – www.health.state.mn.us/diseases/coronavirus/facilityhlthscreen.pdf

MDH: Materials for businesses and employers – www.health.state.mn.us/diseases/coronavirus/materials

Minnesota Department of Employment and Economic Development (DEED): COVID-19 information and resources – <https://mn.gov/deed/newscenter/covid/>

Minnesota Department of Labor and Industry (DLI): Updates related to COVID-19 – www.dli.mn.gov/updates

Federal OSHA – www.osha.gov

Handwashing

MDH: Handwashing video translated into multiple languages – www.youtube.com/watch?v=LdQuPGVcceg

Respiratory etiquette: Cover your cough or sneeze

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

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

MDH: www.health.state.mn.us/diseases/coronavirus/prevention.html

Social distancing

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

MDH: www.health.state.mn.us/diseases/coronavirus/businesses.html

Housekeeping

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

CDC: www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/disinfecting-your-home.html

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

Environmental Protection Agency (EPA): www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2

Employees exhibiting signs and symptoms of COVID-19

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

MDH: www.health.state.mn.us/diseases/coronavirus/basics.html

MDH: www.health.state.mn.us/diseases/coronavirus/facilityhlthscreen.pdf

MDH: www.health.state.mn.us/diseases/coronavirus/returntowork.pdf

State of Minnesota: <https://mn.gov/covid19/for-minnesotans/if-sick/get-tested/index.jsp>

Training

CDC: www.cdc.gov/coronavirus/2019-ncov/community/guidance-small-business.html

Federal OSHA: www.osha.gov/Publications/OSHA3990.pdf

MDH: www.health.state.mn.us/diseases/coronavirus/about.pdf

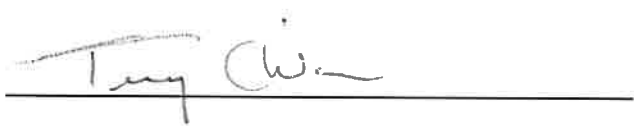
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9. **Windsor Companies can establish** a protocol for accommodating customers, clients and visitors who cannot wear a face covering due to a medical condition, mental health condition, or disability. Businesses may not require customers to provide proof of a medical condition mental health condition, or disability, or require customers to explain the nature of their conditions or disability.

10. **Windsor Companies has established** a protocol for customers, clients and visitors who refuse to wear a face covering where wearing a face covering is required. **Windsor Companies** may refuse entry or services to customers, clients, or visitors who refuse to wear a face covering when required by Executive Order 20-81or when otherwise required by the business even if not required by the Executive Order.

Certified by:

A handwritten signature in black ink, appearing to read "Terry Childers", is written over a solid horizontal line.

Terry Childers – President Windsor Companies

February 3, 2021

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