

Coronavirus Action Plan – Hotels and Lodging

Location:

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Sterling Insurance Group Demo Account

This is a sample Coronavirus Action Plan. It is not meant to be exhaustive or construed as legal advice. Consult additional insurance and/or legal counsel for professional advice. Please modify this action plan to meet your business needs, taking all relevant federal, state and local compliance requirements into account.

The coronavirus (COVID-19) outbreak has impacted businesses across a variety of industries, forcing them to rethink their daily operations to ensure the safety of their employees and the general public. This is no different for hospitality operations, where multiple workers may come into contact with innumerable guests throughout the workday when checking them in, cleaning their rooms or providing other guest services. In these instances, just one misstep can lead to the quick spread of COVID-19, jeopardizing the well-being of workers.

To help slow the spread of COVID-19 and safeguard our staff, Sterling Insurance Group Demo Account has created an action plan for responding to COVID-19. This plan, which is based on Centers for Disease Control and Prevention (CDC) and Occupational Safety and Health Administration (OSHA) guidance, highlights the responsibilities of managers and employees, and outlines the steps Sterling Insurance Group Demo Account is taking to address COVID-19.

RESPONSIBILITIES

When it comes to ensuring a safe workplace during the COVID-19 outbreak, both managers and employees have their role to play. The following is a breakdown of the responsibilities for Sterling Insurance Group Demo Account leadership and staff.

Managers and Supervisors

Sterling Insurance Group Demo Account leadership, including managers and supervisors, should familiarize themselves with the details of the action plan. Above all, leadership must be prepared to answer questions from employees and set a good example by adhering to the guidance prescribed in the plan. This involves practicing social distancing and good personal hygiene.

Employees

Employees play a critical role in Sterling Insurance Group Demo Account's COVID-19 prevention efforts. To protect everyone in the facility, Sterling Insurance Group Demo Account has a number of general best practices employees should follow:

- Understand the signs and symptoms of COVID-19, and stay home if you are feeling sick—Any employee who
 is experiencing symptoms of COVID-19 (e.g., fever, cough, shortness of breath, sore throat, runny nose, body aches,
 chills or fatigue) should stay home. Individuals experiencing such symptoms should also be instructed to consult
 guidance from the CDC on seeking medical care.
- **Practice good hygiene**—Employees should clean their hands often, either with an alcohol-based hand sanitizer, or soap and water. Hand sanitizers should contain at least 60%-95% alcohol, and employees should wash their hands with soap for at least 20 seconds. In addition, employees should avoid touching their face and cough into their arm.
- Practice social distancing—Social distancing is the practice of deliberately increasing the physical space between people to avoid spreading illness.

For specific employee safety protocols, click here.

Pandemic Response Team

The pandemic response team is a cross-functional team that recommends and oversees workplace protocols to control the spread of COVID-19. The team will include the following roles:

Provided by Sterling Insurance Group

- Manager—[Insert name of individual or department] is responsible for the facility's overall action plan. [Insert name of
 individual or department] is responsible for working with stakeholders and relevant health and safety bodies to
 manage this action plan.
- Virus prevention and protocols lead—[Insert name of individual or department] is responsible for recommending
 and developing protocols to ensure the wellness of all employees. They are also tasked with overseeing procedures
 for isolating employees should they become sick at work.
- Sanitization and disinfection lead—[Insert name of individual or department] manages logistics related to daily and periodic sanitation and disinfection efforts. Their responsibilities include ensuring that routine cleanings are completed and that the necessary cleaning supplies are readily available.
- Communication lead—[Insert name of individual or department] is tasked with managing any and all pandemicrelated communications. They will work with human resources and internal communication stakeholders to ensure
 COVID-19 training is completed and that employees and their managers understand their role in preventing the
 spread of the disease. [Insert name of individual or department] will provide COVID-19 related updates on a [Insert
 frequency] basis and as needed.

OPERATING PROTOCOLS

In order to keep staff safe and prevent the spread of COVID-19, Sterling Insurance Group Demo Account requires the following workplace protective measures:

General Safety Policies

- Employees who exhibit signs or symptoms of COVID-19 will be asked to leave the facility.
- Access to hand-washing stations and alcohol-based hand sanitizers will be provided to employees and guests. [Insert details].
- Employees can voice COVID-19 concerns by [Insert details].
- Sterling Insurance Group Demo Account will establish flexible work practices to reduce the number of individuals in the hotel during normal business hours.
- Sterling Insurance Group Demo Account will comply with mandated occupancy limits. [Insert details. Take state and local rules into account].
- Sterling Insurance Group Demo Account will provide tissues and no-touch disposal receptacles. [Insert details].
- Sterling Insurance Group Demo Account will place posters that encourage hand hygiene to help stop the spread of COVID-19 at the entrance to the workplace and in other workplace areas where they are likely to be seen. [Insert details].
- Sterling Insurance Group Demo Account will increase ventilation rates in an effort to reduce the abundance of potentially harmful particles.
- Sterling Insurance Group Demo Account will perform more frequent cleanings of common areas. [Insert details].
- Sterling Insurance Group Demo Account will reduce housekeeping hours and will not mandate room cleanings during the day. [Insert details].
- Sterling Insurance Group Demo Account is aware that some employees may be at higher risk for serious illness, such as older adults and those with chronic medical conditions. To safeguard at-risk workers, we will take steps to ensure they have minimal contact with others. [Insert details].
- Sterling Insurance Group Demo Account is prepared to change our business practices if needed to maintain critical operations. [Insert details].
- Sterling Insurance Group Demo Account will assess food services, providing to-go options and other alternatives to traditional sit-down dining to ensure staff and guest safety. [Insert details].
- Sterling Insurance Group Demo Account has identified alternate supply chains for critical goods and services. [Insert details].
- Sterling Insurance Group Demo Account has contingency plans in place should absenteeism spike as a result of COVID-19. [Insert details].
- Sterling Insurance Group Demo Account will ensure there's a minimum of 6 feet of space between all desks and workspaces. Seating in the lobby, outdoor areas and meeting rooms will also be appropriately spaced.

- Sterling Insurance Group Demo Account will modify the flow of traffic to minimize potential close contact with others.
- Sterling Insurance Group Demo Account will refrain from offering valet services. [Insert details].
- Sterling Insurance Group Demo Account will establish protocols for food delivery and pickup. Food delivery from outside vendors will be restricted to lobby handoffs. [Insert details].
- In order to protect staff when working around guests, Sterling Insurance Group Demo Account may provide:
 - Gloves—Employees may contract COVID-19 by touching contaminated surfaces and then touching their face. Gloves are an effective way to prevent COVID-19 from getting on an employee's skin. They are also a good reminder for employees not to touch their face.
 - Face masks—Viruses can be transmitted through the mouth via tiny viral particles known as aerosols. Face
 masks can help protect employees from these particles.

Protocols for Workers

To ensure safety at Sterling Insurance Group Demo Account facilities, employees will be asked to:

- Educate themselves on guest protocols and procedures.
- Notify their supervisor and stay home if they are experiencing COVID-19 symptoms (e.g., fever, cough or shortness of breath).
- Stagger lunches to limit the number of individuals congregating in break areas. Sterling Insurance Group Demo
 Account may divide crews to reduce the number of workers in the facility at a given time.
- Limit close contact with others, maintaining a distance of at least 6 feet when possible. Workers are encouraged to
 remind guests to maintain at least 6 feet of distance from workers and other guests. Above all, avoid job tasks that
 require face-to-face contact with others where possible. If this is unavoidable, employees will be provided with face
 masks, physical barriers and other workplace controls to ensure their safety.
- Wear face masks where other social distancing measures are difficult to maintain.
- Refrain from sharing equipment. In instances when this is unavoidable, Sterling Insurance Group Demo Account will
 provide alcohol-based wipes and other cleaning materials that employees can use to clean equipment.
- Keep the following in mind when exchanging paper and coin money:
 - Do not touch your face after the exchange.
 - o Ask guests to place cash on the counter rather than directly into your hand.
 - Place money directly on the counter when providing change back to guests.
 - o Sanitize the counter between guest check-in and check-out.
- Clean and disinfect frequently touched surfaces, including workstations, payment terminals, door handles, tables and countertops on a regular basis.
- Take care when attending meetings and gatherings:
 - Consider using videoconferencing or teleconferencing when possible for work-related meetings and gatherings. When videoconferencing or teleconferencing is not possible, hold meetings in open, wellventilated spaces.
 - o Consider canceling or postponing large work-related meetings or gatherings that can only occur in-person.
- Practice proper hand hygiene. Wash your hands regularly with soap and water for at least 20 seconds. An alcohol-based hand sanitizer containing at least 60% alcohol can also be used. Employees should clean their hands:
 - Before, during and after food preparation
 - o Before eating food
 - After using the restroom
 - o After blowing their nose, coughing or sneezing
 - o After putting on, touching or removing face masks
 - o Before and after work shifts
 - Periodically throughout the day

- Before and after work breaks
- After touching money or objects that have been handled by guests
- Avoid touching your eyes, nose and mouth whenever possible.
- Avoid contact with others whenever possible (e.g., handshakes).
- Avoid gathering when entering and exiting the facility. Employees should also only enter and exit designated areas.
- Follow any posted signage regarding COVID-19 social distancing practices.

Protocols for Guests

In order to protect Sterling Insurance Group Demo Account guests as well as our staff, we will:

- Communicate our safety protocols and why we are taking specific precautions. This will be done using signage, social media and other available communication channels. Guests will also be provided with information regarding other Sterling Insurance Group Demo Account safety protocols upon check-in.
- Encourage guests to practice social distancing when in the facility. Guests will be asked to maintain at least 6 feet of distance from staff via written signage or instructions provided prior to their visit.
- Place hand sanitation stations and wipes throughout the facility and encourage guests to use them frequently.
 Dispensers will be touchless where possible and will be located in reception areas, hotel lobbies, restaurant entrances, meeting and convention spaces, elevator landings, pool areas and exercise facilities.
- Ensure guests use entrances that utilize touchless, automatic doors where possible.
- Require guests to use masks in common areas or where maintaining social distancing precautions are difficult. We
 will provide guests with masks if possible. Information regarding proper mask use will be communicated through
 signage and during guest check-ins.
- Limit the number of guests allowed in elevators at a given time. We will also use floor markings to encourage social distancing practices.
- Place disinfectants and sanitizers in guest rooms to promote regular cleanings.
- Remove items from guest rooms that aren't single-use or are otherwise unnecessary (e.g., reading material, throw pillows and menus).
- Encourage the use of touchless payment options to minimize handling cash, credit cards and reward cards.
- Increase cleaning and sanitizing of all high-touch surfaces (e.g., ATMs, pens, touch screens and carts).
- Minimize person-to-person contact where possible. This could involve establishing rules regarding the number of guests allowed in the lobby at a given time.
- Update messaging on our websites to educate quests on operational precautions and hours.
- Move the credit card reader farther away from the individual working the check-in counter. This increases the
 distance between the guests and the employee.
- Place visual cues, such as floor decals, colored tape or signs, to illustrate where guests should stand during check-in and check-out.

Additional Safety Policies

[Insert CVOID-19 response protocols for specific aspects of your facility's operations].

Sick Leave Policy

• [Insert policies specific to your facility's operations].

CLEANING AND DISINFECTING PROCEDURES

- Surfaces and equipment will be disinfected at the end of each shift, before and after use, or—for frequently touched items—multiple times a day. The following items will be cleaned regularly:
 - Door handles and push plates
 - Restrooms
 - Handles on beverage dispensers

- Refrigerator and freezer handles
- Plastic curtains on walk-in refrigerators and freezers

- Display screens, handles and buttons on equipment
- Thresholds and hand railings
- Display cases
- Self-service areas
- Kiosks
- Sneeze guards
- Pens or other writing utensils
- Clipboards
- Elevator buttons
- Employee linens
- Ice scoops
- Sink handles
- Soap dispenser push plates
- Towel dispenser push plates
- Trash receptacle touch points
- Cleaning tools
- o Buckets
- Telephones
- Computers
- Office cabinet handles
- Tables, chairs, booths and other furniture
- Counters and other surfaces
- Vending machine buttons
- o Baby changing stations in restrooms
- o Pens or other writing utensils
- Shared work vehicles

- o Floors
- o Hostess stands
- o Telephones
- Touchscreens and keypads
- Remotes
- Coffee and beverage stations
- Menus and brochures
- Safety latches and peepholes
- Lamps
- Light switches and thermostats
- Drapery pull handles
- Alarm clocks
- o Minibars
- o Irons
- Luggage racks
- o Hair dryers
- Faucets and toilet/urinal handles
- Seat covers
- Stall latches
- Sanitary receptacles
- Sharps containers
- Public areas, including pool, spa and gym facilities
- Stairwells
- Carpets
- o Food prep areas.
- Dishes and cutlery
- If we determine one of our guests has tested positive for COVID-19, either during or after their stay, their room will be removed from service. Rooms will only be returned to service after undergoing a deep cleaning performed by a licensed third party.
- Guest rooms will be left vacant for a predetermined period of time before cleaning will begin. Guest rooms that have been disinfected will be tagged properly. [Insert details].
- Special precautions will be taken when it comes to laundering sheets, towels and other items:
 - All items will be washed at a high temperature and in accordance with CDC guidelines.
 - Dirty laundry will be stored in bags to reduce employee contact.
- Employees responsible for cleaning will be given the appropriate protective equipment. Cleaning should be completed using CDC-recommended products, including:
 - Environmental Protection Agency-registered household disinfectants
 - Alcohol solutions with at least 60% alcohol
 - o Diluted household bleach solutions (if appropriate for the surface)
- Trash will be collected from the workplace regularly. Those collecting trash will be instructed to wear nitrile, latex or

vinyl gloves.

- HVAC air filters will be cleaned and disinfected regularly.
- Hand sanitizer dispensers will be refilled frequently.
- When an employee has tested positive for COVID-19, deep cleaning will be triggered and Sterling Insurance Group Demo Account will ensure areas in which the individual worked are cleaned thoroughly. In regard to deep-cleaning practices:
 - Sterling Insurance Group Demo Account will identify an approved external company to complete a deep cleaning of the facilities. This external company will be equipped with the proper training, permits and cleaning equipment to complete the task.
 - o The pandemic response team will coordinate and supervise deep-cleaning efforts to ensure:
 - There is a specific plan and strategy in place, and that plan accounts for all machinery, equipment, common areas, tools and offices.
 - Authorized individuals are the only ones allowed access to the site during the deep cleaning.
 - Employees are aware of deep-cleaning practices.
 - The company contracted to perform the deep cleaning uses the appropriate PPE during the process and disposes of potentially contaminated items properly.

EXPOSURE SITUATIONS

Sterling Insurance Group Demo Account has response plans in place for situations when employees exhibit symptoms of or test positive for COVID-19.

Employee Exhibits Symptoms of COVID-19 Before Entering the Facility

- The employee reports their symptoms to their supervisor, who then communicates that an employee is exhibiting symptoms of COVID-19 to the relevant parties (e.g., human resources).
- The employee is given a face mask and gloves, and is sent to a designated isolation room for further evaluation by the virus prevention and protocols lead or another designated individual. This evaluation will examine an employee's symptoms in more detail, flagging employees who are experiencing the following:
 - o A fever of 100.4 F or higher
 - Shortness of breath or difficulty breathing
 - A cough
 - A runny nose
 - Muscle pain
 - Tiredness
- If COVID-19 symptoms are confirmed, employees may be asked to go home and speak with their health care
 provider. Sterling Insurance Group Demo Account will ensure employees are able to get home safely before
 dismissing them. If, after an evaluation, the employee is not exhibiting COVID-19 symptoms, they may return to work
 at the discretion of the virus prevention and protocols lead.

Self-quarantining and Return to Work

Employees who test positive for COVID-19 or believe they have been infected will be instructed to follow the advice of a qualified medical professional and self-quarantine. When self-quarantining, employees should:

- Stay away from other people in their home as much as possible, staying in a separate room and using a separate restroom if available.
- Not allow visitors.
- Wear a face mask if they have to be around people.
- Avoid sharing household items, including drinking cups, eating utensils, towels and bedding.
- Clean high-touch surfaces daily.
- Continue monitoring their symptoms, calling their health care provider if their condition worsens.

Notably, employees who are symptomatic or who have tested positive should not return to work until the conditions outlined in the table below are met:

Return to Work Considerations	
Employee was symptomatic but was not tested for COVID-19.	Employee was tested for COVID-19.
The employee may return to work if:	The employee may return to work if:
 They have not had a fever for at least 72 hours and have not used fever-reducing medication during that time. 	They no longer have a fever.Coughs and other symptoms have improved.
Coughs and other symptoms have improved. Soven days have passed since they first.	They have received two negative COVID-19 tests in a row.
 Seven days have passed since they first experienced symptoms. 	

When an employee tests positive for COVID-19, deep-cleaning procedures will be triggered. Furthermore, employees who have been in close contact with an individual who has tested positive for COVID-19 will be instructed to self-quarantine.

OSHA RECORDKEEPING AND REPORTING

Sterling Insurance Group Demo Account will adhere to OSHA-mandated requirements as they relate to recording and reporting certain work-related injuries and illnesses.

QUESTIONS

If employees have any questions regarding the content of this action plan, they should be instructed to speak with their supervisor. Furthermore, while the strategies highlighted in this document can protect workers from COVID-19, it's important to follow CDC guidance at all times. For more information, click here.