

COVID-19 Preparedness & Response Plan

GENERAL

The following COVID-19 Preparedness & Response Plan has been established for Crest Ford (the “Dealership”) in accordance with the requirements in the [Executive Orders \(EOs\)](#) for COVID-19 signed by Governor Gretchen Whitmer, the OSHA [Guidance on Preparing Workplaces for COVID-19](#), and the latest [guidance](#) from the US Centers for Disease Control and Prevention (CDC). The purpose of this plan is to minimize or eliminate employee exposure to SARS-CoV-2 (“COVID-19”).

The EOs, OSHA guidance, and CDC guidance for COVID-19 have general safeguards applicable for all workplaces and specific safeguards for certain industries. David Way has read these guidance documents carefully, found the safeguards appropriate to the Dealership based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

As the COVID-19 situation evolves, the EOs and CDC guidance are periodically updated. David Way (General Manager) and Rachel Moran (Human Resource Manager) will be responsible for visiting the EO webpage and CDC guidance webpage regularly (for example, weekly) for the latest information and for revising the plan as necessary. [Click here for the EOs](#). [Click here for the CDC guidance documents](#).

The Dealership has designated one or more worksites supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The name(s) of the supervisor(s) is/are Jim Clark, Sam Haynes, Rachel Moran, and David Way. The supervisor will remain on-site at all times when employees are present on site. An on-site employee may be designated to perform the supervisory role.

The plan will be made readily available to employees and labor unions. The plan will be made available via email, www.crestfordcenterline.com, and hardcopy at each supervisor’s office and the lunchrooms.

EXPOSURE DETERMINATION

Worker risk of occupational exposure to COVID-19, during an outbreak may depend in part on the industry type and need for contact within 6 feet of people known to have, or suspected of having, COVID-19. OSHA has divided job tasks into four risk exposure levels, as shown below. Most American workers will likely fall in the lower exposure risk (caution) or medium exposure risk levels.



The Dealership has evaluated routine and reasonably anticipated tasks and procedures for all employees to determine whether there is actual or reasonably anticipated employee exposure to COVID-19. David Way was responsible for the exposure determination. The Dealership has determined that its employees' jobs fall into only the lower exposure and medium exposure risk categories as defined by the OSHA Guidance on Preparing Workplaces for COVID-19:

- **Lower Exposure Risk Jobs.** These jobs do not require contact with known or suspected cases of COVID-19 nor frequent close contact (for example, within six feet) with the general public. Workers in this category have minimal occupational contact with the public and other coworkers. Examples are small offices, small manufacturing plants (less than 10 employees), small construction operations (less than 10 employees), and low-volume retail establishments, provided employees have infrequent close contact with coworkers and the public. For auto dealerships, this category includes office staff, technicians, body shop employees and painters.
- **Medium Exposure Risk Jobs.** These jobs are those that require frequent or close contact (for example, within six feet) with people who may be infected with COVID-19, but who are not known or suspected COVID-19 patients. Examples are most jobs at manufacturing plants, construction sites, schools, high-volume retail settings, and other high-population-density work environments. For auto dealerships, this category includes all sales staff, managers, cleaning staff, drivers, porters, parts department employees, services advisors and service managers.

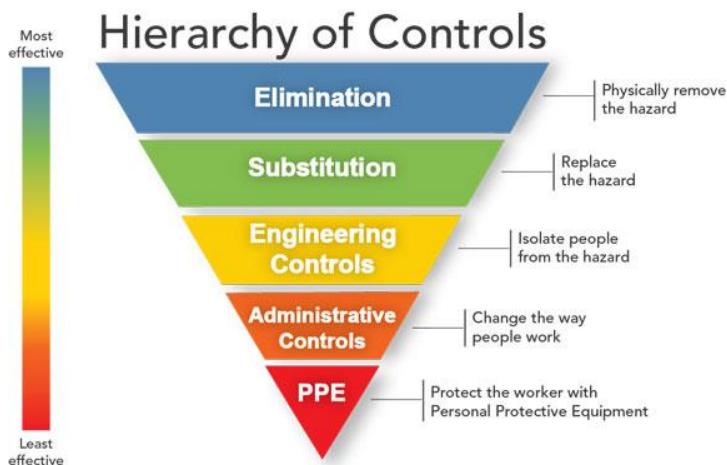
David Way has verified that the Dealership has no high-risk exposure jobs. High exposure risk jobs have high potential for exposure to known and suspected cases of COVID-19. Examples are most jobs in healthcare, medical transport, nursing homes and residential care facilities, mortuaries, law enforcement, and correctional facilities.

The Dealership has categorized its jobs as follows:

Job/Task	Exposure Risk Determination (Lower or Medium)	Qualifying Factors (For Example, No Public Contact, Public Contact)
Driver, Porter	Medium	May be within 6 feet of customers and co-workers
Janitor/cleaning crew	Medium	May be within 6 feet of customers and co-workers
Parts Department employees	Medium	May be within 6 feet of customers and co-workers
Sales staff and management	Medium	May be within 6 feet of customers and co-workers
Service Advisors	Medium	May be within 6 feet of customers and co-workers
Service Manager(s)	Medium	May be within 6 feet of customers and co-workers
Technicians	Low/Medium	May come in contact with infected surfaces and within 6 feet of co-workers
Body shop employees/painters	Low	May come in contact with infected surfaces
Office staff	Low/Medium	May come in contact with infected surfaces, no/minimal public contact, may be within 6 feet of co-workers

Controlling exposures to occupational hazards is the fundamental method of protecting workers. Traditionally, a hierarchy of controls has been used as a means of determining how to implement feasible and effective control solutions.

One representation of this hierarchy is as follows:



<https://www.cdc.gov/niosh/topics/hierarchy/default.html>

ELIMINATION AND SUBSTITUTION CONTROLS

In a dealership setting, elimination of the hazard, COVID-19, is difficult to achieve; however, the Dealership has implemented feasible elimination and substitution controls. Elimination controls involve completely eliminating employee exposure to the hazard and substitution means replacing the hazard with a non-hazardous method or device. The following elimination and substitution controls have been implemented:

ELIMINATION CONTROL
Permit remote work when feasible or when the virus risk is high in the geographic area of the Dealership
Require employees to stay home when feeling ill and establish flexible policies to permit leave time as appropriate
Require isolation of customers and employees exhibiting symptoms
Restrict the number of employees and customers in the dealership
Restrict access to employee areas and customer waiting areas
Encourage customers to use credit cards instead of cash
Encourage customers to use curb-side service or home delivery

ENGINEERING CONTROLS

The Dealership has implemented feasible engineering controls to minimize or eliminate employee exposure to COVID-19. Engineering controls involve isolating employees from work-related hazards using ventilation and other engineered solutions. In workplaces where they are appropriate, these types of controls reduce exposure to hazards without relying on worker behavior and can be the most cost-effective solution to implement.

For lower exposure risk jobs, new engineering controls are not required. For medium exposure risk jobs, engineering controls can include:

- Installing physical barriers (such as clear plastic sneeze guards) between coworkers or between workers and customers.
- Implementing touchless payment for customers and encouraging curbside service for customers.
- Increasing the amount of ventilation in the building.
- Increasing the amount of fresh outdoor air that is introduced into the building.

David Way will be responsible for seeing that the correct engineering controls are chosen, installed, maintained for effectiveness, and serviced when necessary.

The following engineering controls have been implemented:

ENGINEERING CONTROL
Install sneeze guards or other physical barriers
Increase ventilation in work areas by opening windows and doors
Rearrange customer waiting areas to reduce seating capacity
Remove food and drink serving stations and complimentary items
Reduce entry and exit points to be used by customers and employees
Rearrange of employee break rooms to remove tables and chairs to reduce capacity
Email customer documents, repair orders where feasible instead of providing hard copies
Clean break/lunchroom and bathroom areas frequently. Employees performing cleaning will be issued proper personal protective equipment such as nitrile, latex, or vinyl gloves and gowns, as recommended by the CDC
Disinfect vehicles when a vehicle is brought in for service, when it is returned to a customer, when a vehicle is taken from inventory for a test drive, and when a used vehicle is taken into the dealership as a trade or from auction. Focus on "high touch areas" including seat belt components, handles, drive shaft, visors and the gas cap
Utilize steering wheel, seat, gear shift, and floor mat covers in vehicles
All employees involved in touching customers' vehicles must use rubber gloves and change them frequently and must change or wash gloves before working on a different vehicle
If a vehicle may have been exposed to someone with COVID-19 do not touch it for 24 hours, then disinfect it.
Routine cleaning and disinfecting all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, and doorknobs
Wipe down the exterior door handles before opening vehicles

ADMINISTRATIVE CONTROLS

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. David Way and Rachel Moran will be responsible for seeing that the correct administrative controls are chosen, implemented and maintained for effectiveness.

The following administrative controls have been established for the Dealership:

Job/Task	Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)
All employees	Maintain at least six feet from everyone on the worksite.
All employees	Use ground markings, signs, and physical barriers to prompt employees to remain six feet from others and to notify employees and customer of any face covering requirements.
All employees	Promote remote work (telecommuting) to the fullest extent possible.
All employees	Promote flexible work hours (staggered shifts) to minimize the number of employees in the facility at one time.
All employees	Establish alternating days or extra shifts to reduce the total number of employees in the facility at a given time.
All employees	Restrict business-related travel for employees to essential travel only.
All employees	Restrict face-to-face meetings. Communicate with others through phone, email, teleconferencing, and web conferencing.
All employees	Restrict the number of customers in the dealership at any given time.
All employees	Minimize the sharing of tools, equipment, and items.
All employees	Provide employees with non-medical grade face coverings (cloth face coverings).
All employees	Require employees to wear cloth face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.
All employees	Require customers and the public to wear cloth face coverings.
All employees	Keep customers informed about symptoms of COVID-19 and ask sick customers to stay at home until healthy again. Encourage sick customers to use drive-through services, curbside pickup, or home delivery.
All employees	Provide customers and the public with tissues and trash receptacles.
All employees	Encourage customers to place orders for vehicles, parts or services through the phone or web.
All employees	Promote curbside and home delivery to minimize contact with customers.
All employees	Encourage proper cough and sneeze etiquette by employees, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands.
All employees	Ensure that sick leave policies are flexible and consistent with public health guidance, so employees do not go to work sick.
All employees	Do not require a healthcare provider's note for employees who are sick with acute respiratory illness to validate their illness.
All employees	Maintain flexible policies that permit employees to stay home to care for a sick family member.
All employees	Stagger employee breaks and lunches, if practicable, to reduce the size of any group at any one time to less than ten (10) people
All employees	Minimize or eliminate ride-sharing. While in vehicles, employees must ensure adequate ventilation.
All employees	Each employee should use/drive the same truck or piece of equipment and not rotate vehicles. Additionally, employees and customers using demonstrator vehicles should be advised to limit other vehicle passengers, such as family members, from using/riding in the vehicle.

HAND HYGIENE

David Way will be responsible for seeing that adequate handwashing facilities are available in the Dealership and that regular handwashing is required. Frequency of such handwashing will be determined in part by factors such as when and how often the employees' hands are potentially exposed to COVID-19. When handwashing facilities are not available, the Dealership shall provide employees with antiseptic hand sanitizers or towelettes. The Dealership will provide time for employees to wash hands frequently and to use hand sanitizer.

DISINFECTION OF ENVIRONMENTAL SURFACES

The Dealership will increase facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (for example, door handles), paying special attention to parts, products, and shared equipment (for example tools, machinery, office equipment such as copiers, telephones, fax machines, and vehicles). The Dealership will make cleaning supplies available to employees upon entry and at the worksite.

David Way will be responsible for seeing that environmental surface in the workplace are cleaned and disinfected. Frequency of such disinfection will be determined in part by factors such as when and how often the environmental surfaces are potentially exposed to COVID-19. When choosing cleaning chemicals, the Dealership will consult information on Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens. Products with EPA-approved emerging viral pathogens claims are expected to be effective against COVID-19 based on data for harder to kill viruses. The manufacturer's instructions for use of all cleaning and disinfection products will be strictly adhered to.

The following is a list of environmental surfaces, methods used to disinfect, and the frequency of such disinfection:

Surface	Method/Disinfectant Used	Schedule/Frequency
Desks / Keyboard / Door handles	Common Cleaning solutions that kill 99.9% of bacteria etc.	Nightly after store closing, and twice daily
Interior of service vehicles	Clobberizer spray	When vehicle enters and exits service
Inventory Vehicles	Clorox / Generic Wipes	After usage
Hands	Bathroom Soap, and Alcohol Hand Sanitizer	As needed

The Dealership will perform enhanced cleaning and disinfection after persons confirmed to have COVID-19 have been in a work area. In the interim, that work area will be temporarily closed, and employees will be sent home or relocated. David Way and Rachel Moran will be responsible for seeing that this protocol is followed.

The following methods will be used for enhanced cleaning and disinfection:

- Close off areas used by the person who is sick.
- Open outside doors and windows to increase air circulation in the area.
- Wait 24 hours before cleaning or disinfecting. If 24 hours is not feasible, wait as long as possible.
- Clean and disinfect all areas used by the person who is sick, such as offices, bathrooms, common areas, shared electronic equipment like tablets, touch screens, keyboards, remote controls, and ATM machines.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

The Dealership will provide employees with personal protective equipment for protection from COVID-19 appropriate to the exposure risk associated with the job. The PPE policy will follow the CDC and OSHA guidance applicable to the industry and types of jobs at the workplace, and it will be in accordance with latest EOs.

All types of PPE are to be:

- Selected based upon the hazard to the worker.
- Properly fitted and periodically refitted as applicable.
- Consistently and properly worn.
- Regularly inspected, maintained, and replaced, as necessary.
- Properly removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, others, or the environment.

The Dealership will provide non-medical grade face coverings (cloth face coverings) to employees. (Cloth face coverings are technically not considered PPE.) The Dealership will require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace. The Dealership will consider face shields when employees cannot consistently maintain three feet of separation from other individuals in the workplace.

The following type(s) of PPE have been selected for use:

Job/Task	PPE
All Employees	Require all employees to wear masks when performing in-person work with co-workers and customers
All Employees	Require all employees to wear masks where maintaining 6 feet of distance from another person is not possible
All Employees	Require all employees to wear masks when walking through or sitting in area near customers or co-workers
All Employees	Instruction employees on proper mask wearing
All Employees	Require employees to wear gloves when cleaning or handling potentially contaminate services or equipment

HEALTH SURVEILLANCE

The Dealership has implemented a screening protocol to identify known or suspected cases of COVID-19 among employees and isolate them from the remainder of the workforce. Jim Clark and Sam Haynes will be responsible for ensuring that all required health surveillance provisions are performed.

As workers enter the place of employment at the start of each work shift, the Dealership will have employees self-screen for COVID-19. The Dealership will have employees complete or respond to a questionnaire covering the signs and symptoms of COVID-19 and their exposure to people with suspected or confirmed COVID-19. When obtainable, a no-touch thermometer will be used for temperature screening of employees. The Dealership will similarly screen contractors, suppliers, and any other individuals entering the worksite.

Employees have been directed to promptly report any signs and symptoms of COVID-19 to their department manager before and during the work shift. The Dealership has provided employees with instructions for how to make such a report to the employer.

The specific instructions for employee reporting are as follows:

Employee with confirmed case of COVID-19

- Immediately contact supervisor
- Leave work immediately or do not report to work (or leave as soon as you report the situation to your supervisor)

Employee suspects he/she is showing symptoms

- Immediately contact supervisor
- Leave work immediately or do not report to work (or leave as soon as you report the situation to your supervisor)

Employee exposed to confirmed or presumptive positive case of COVID-19

- Immediately contact supervisor to determine whether self-isolation is required pursuant to current CDC guidance

The Dealership will physically isolate any employees with known or suspected COVID-19 from the remainder of the workforce, using measures such as, but are not limited to:

- Not allowing known or suspected cases to report to or remain at their work location.
- Sending known or suspected cases to a location (for example, home) where they are self-isolating during their illness.
- Assigning known or suspected cases to work alone at the location where they are self-isolating during their illness.

The Dealership will not discharge, discipline, or otherwise retaliate against employees who stay at home or who leave work when they are at particular risk of infecting others with COVID-19.

When an employee is identified with a confirmed case of COVID-19, Rachel Moran will notify the local public health department immediately, and any co-workers, contractors, or suppliers who may have come into contact with the person who is the confirmed case of COVID-19, within 24 hours. When notifying coworkers, contractors, and suppliers, the Dealership will not reveal the name or identity of the confirmed case.

The Dealership will allow employees with a confirmed or suspected case of COVID-19 to return to the workplace only after they are no longer infectious according to the latest guidelines from the CDC.

TRAINING

Rachel Moran shall coordinate COVID-19 training and ensure compliance with all training requirements.

The Dealership will train workers on, at a minimum:

1. Routes by which the virus causing COVID-19 is transmitted from person to person.
2. Distance that the virus can travel in the air, as well as the time it remains viable in the air and on environmental surfaces.
3. Symptoms of COVID-19.
4. Workplace infection-control practices.
5. The proper use of PPE, including the steps for putting it on and taking it off.
6. Steps the worker must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
7. How to report unsafe working conditions.

Rachel Moran shall create a record of the training. The record will list the names of the employees trained, the training date, name of trainer, and content of training.

RECORDKEEPING

The Dealership will maintain the following records as they relate to the COVID-19 preparedness and response plan:

1. Training records.
2. A record of daily entry self-screening results for all employees or contractors entering the workplace, including a questionnaire covering signs and symptoms of COVID-19 and exposure to people with suspected or confirmed COVID-19.
3. When an employee is identified with a confirmed case of COVID-19, record when the local public health department was notified; as well as any co-workers, contractors, or suppliers who may have come into contact with the person who was the confirmed case of COVID-19.

Kristi Frelich and Rachel Moran will ensure that the records are kept. Any health-related information and documentation gathered from employees is maintained confidentially and in compliance with state and federal law. Specifically, medical documentation is stored separate from employees' personnel documentation.

FACE COVERINGS

When wearing the face mask, the mask shall be worn in a manner that follows the below CDC guidelines:

- Place the mask over your mouth and nose.
- Tie it behind your head or use ear loops and make sure it is flush/snug against face.
- Do not touch your mask while wearing it.
- If you accidentally touch your mask, wash or sanitize your hands.
- Remove the mask by untying it or lifting off the ear loops without touching the front of the mask or your face.
- Employees are responsible for regularly washing their face mask with soap and water in the washing machine.

Medical issues that interfere with wearing face coverings:

The Dealership will engage in an interactive process with such employees as required by the Americans with Disabilities Act (ADA). Potential accommodations may include:

- Provision of an alternative face mask or covering/face shield that can be tolerated with the medical condition
- Removal/transfer of employee from customer-facing responsibilities
- Provide employee with unpaid leave until face coverings are no longer required in the workplace
- Accommodate the employee in some other fashion

The Dealership may request additional information including medical documentation from the employee regarding his or her medical condition and restriction against wearing a face mask or covering. Until the issue of wearing a face covering is resolved, the employee may be temporarily sent home or reassigned to a non-customer facing position. Employees who fail or refuse to wear face coverings, but do not have a valid medical or other legally protected objection, will not be permitted to work and shall be disciplined for not following work requirements.

The Dealership will follow all Executive Orders issued by the State of Michigan and local municipalities regarding the service of customers and use of face masks and coverings.

If a Dealership employee encounters a customer who refuses to wear a face covering, due to the declaration by the EEOC that an individual with COVID-19 poses a direct threat to the health of others, a Dealership employee shall as the customer the following:

- Are you unable to wear a mask because of a disability?
 - If the answer is "Yes":
 - Ô Do not ask additional questions regarding the disability
 - Ô Do not ask for documentation for proof of a disability
 - Ô Do work with the customer to find a way to meet their needs without risking the safety of other customers and employees by offering curbside service outside of the dealership
 - If the answer if "No" we may:
 - Ô Offer the customer a face mask to use while inside the dealership/service area
 - Ô Refuse entry to the dealership/service area if the customer still refuses to wear a mask
 - Ô Arrange a socially distanced customer experience or offer the customer curbside service if feasible

EXPOSURE AND RETURN TO WORK REQUIREMENTS

Employee Exhibits COVID-19 Symptoms Without Test Results: If an employee exhibits COVID-19 symptoms, with or without test results confirming a COVID-19 diagnosis (or is unable to be tested), the employee must be sent home and remain at home until either:

- At least 10 days since symptoms first appeared **and**
- At least 24 hours with no fever without fever-reducing medication **and**
- Symptoms have improved

Or

- no fever **and**
- respiratory symptoms have improved **and**
- employee receives two negative test results in a row, at least 24 hours apart.

Employee Exhibits COVID-19 Symptoms and Tests Positive: If an employee tests positive for COVID-19 and exhibits COVID-19 symptoms, the employee must be sent home and remain at home until either:

- At least 10 days since symptoms first appeared **and**
- At least 24 hours with no fever without fever-reducing medication **and**
- Symptoms have improved

Or

- no fever **and**
- respiratory symptoms have improved **and**
- employee receives two negative test results in a row, at least 24 hours apart.

Employee Tests Positive for COVID-19 with no symptoms: An employee who tests positive for COVID-19 will be directed to self-quarantine away from work. Employees that test positive and continue to remain symptom free may return to work when:

- 10 days have passed since test

Or

- After the employee receives two negative test results in a row, at least 24 hours apart.

Employee Has Close Contact with an Individual Who Has Tested Positive for COVID-19: Employees who have come into close contact with an individual who has tested positive for COVID-19 (co-worker or otherwise) will be directed to self-quarantine for 14 days from the last date of close contact with that individual. Close contact is defined as six (6) feet for a prolonged period of time.

WORKPLACE FLEXIBILITIES AND POTENTIAL BENEFITS FOR EMPLOYEES AFFECTED BY COVID-19

Employees may be eligible for paid and unpaid leaves of absence. Employees may be permitted to utilize available paid time off provided under the Dealership policies concurrently with or to supplement any approved leave.

FAMILIES FIRST CORONAVIRUS RESPONSE ACT (“FFCRA”)

Employees may qualify for two different types of paid leave under the “FFCRA.”

Under the Emergency Paid Sick Leave Act (“EPSLA”), employees may seek up to two weeks (i.e., 10 business days) of paid leave for the following reasons:

1. Subject to a Federal, State, or local quarantine or isolation order related to COVID-19;
2. Advised to self-quarantine due to concerns related to COVID-19;
3. Experiencing symptoms of COVID-19 and seeking a medical diagnosis;
4. Caring for an individual subject to a quarantine or isolation order or advised to self-quarantine due to concerns related to COVID-19;
5. Caring for a son or daughter whose school or childcare provider is closed or unavailable due to COVID-19 precautions; and
6. Experiencing any other substantially similar condition specified by the Secretary of Health and Human Services, in consultation with the Secretary of the Treasury and the Secretary of Labor. (Please note, the Secretary of Health and Human Services has not defined conditions which trigger this subpart under the EPSLA.)

For full-time employees, two weeks of leave equates to 80 hours; for part-time employees, two weeks of leave equates to a number of hours equivalent to the number of hours usually worked in a two-week period.

Paid leave for reasons 1, 2, and 3, above, is paid at the employee's regular rate of pay, capped at \$511/day. Paid leave for reasons 4, 5, and 6, above, is paid at a rate equivalent to two-thirds of an employee's regular rate of pay or minimum wage, whichever is greater, capped at \$200/day.

Under the Emergency Family and Medical Leave Expansion Act, employees may seek up to twelve weeks of leave to care for a son or daughter whose school or childcare provider is closed or unavailable due to COVID-19 precautions. The first two weeks of leave, which run concurrently with the EPSLA leave, may be unpaid; the remaining ten weeks of leave are paid at a rate equivalent to two-thirds of an employee's regular rate of pay or minimum wage, whichever is greater, capped at \$200/day.

EXECUTIVE ORDER 2020-36

Employees who require leave beyond the EPSLA because of their own COVID-19 diagnosis/symptoms, or because they have had close contact or live with an individual with a COVID-19 diagnosis/symptoms, may be eligible for unpaid leave under Executive Order 2020-36 until permitted thereunder to return to work.

UNEMPLOYMENT COMPENSATION BENEFITS

Under Executive Order 2020-76, unemployment compensation benefits are expanded in terms of eligibility, amount, and duration.

Employees who are unable to report to work for reasons related to COVID-19 may be eligible for these benefits. Such reasons include the following:

- Being under self-isolation or self-quarantine in response to elevated risk from COVID-19 due to being immunocompromised;
- Displaying at least one of the principal symptoms of COVID-19 (i.e., fever, atypical cough, atypical shortness of breath);
- Having close contact in the last 14 days with a confirmed COVID-19 diagnosis;
- Needing to care for someone with a confirmed COVID-19 diagnosis; and
- Fulfilling a family care responsibility as a result of a government directive (e.g., caring for a child whose school or childcare provider is closed or otherwise unavailable due to COVID-19).

FMLA and ADA

Employees may be entitled to unpaid leave under the Family and Medical Leave Act ("FMLA") if their absence is related to their own serious health condition or that of a family member. COVID-19 may constitute a serious health condition where "complications arise."

The Dealership is also mindful of its obligations under the Americans with Disabilities Act ("ADA"). Specifically, if an employee requests an accommodation because of a condition that may be complicated by COVID-19 (e.g., cystic fibrosis, emphysema, COPD), then the Dealership engages in the interactive process to provide a reasonable accommodation. This may mean allowing the employee to work remotely (if reasonable) or work an alternative schedule.

PLAN UPDATES AND EXPIRATION

This Plan responds to the COVID-19 outbreak. As this pandemic progresses, the Dealership will update this Plan and its corresponding processes.

This Plan will expire upon conclusion of its need, as determined by the Dealership and in accordance with guidance from local, state, and federal health officials.