

Jay:

Please accept this e-mail as feedback on the proposed regulation. It is my belief this regulation lacks consistency with the current Phase 2 orders that are in place. It is my opinion that the proposed regulation places employers in a Phase 1 status while their employees are in a Phase 2 status. My business is an insurance services business not a healthcare business. Here are my concerns:

1. I should not be asked to classify my employees as "suspected COVID-19".
2. I should not be expected to have policies that allow employees to report they are experiencing symptoms.
3. I should not be asked to make my own determination if someone is symptomatic. For example, I am asthmatic which means I have been COVID-19 symptomatic since 1970. I should not be classified as "Suspected Covid-19".
4. I should not have to verify what my subcontractors are doing. Based on the reading of this, I need to confirm how the US Postal Service is handling the matter. This shouldn't be my job.
5. I should not have to keep a log of everyone that may have been in office space for the past 14 days. I operate in 165,000 square foot space with 4 entrances. There is no way that this can happen.
6. Testing should not be at the discretion of the employee based on the overall policy. We either do this or we don't. Employees need to be accountable for their behavior. They should be required to be tested, if available.
7. Employers should be permitted to terminate employees that have been found to have violated the Governor's current Phase orders that exist. These plans cannot be made to work if employees are not complying with the law.
8. The WHO and CDC have already established that surfaces are low risk and it is mainly be transmitted human to human. The common area, breakroom and lunch room provisions should be eliminated and replaced with the social distancing guideline.
9. The sanitation guideline 1.2 should have an exception to the disinfecting guideline if disposable gloves were utilized.

My main issue with the proposed regulation is that it places a huge requirement on the employer without placing any real requirement for compliance on the employee. The implementation of this plan almost requires that you set up lifeguard stations in the office space to ensure compliance is universally occurring but as soon as the employee leaves the office space they can do whatever they want with no repercussion. This seems unfair and burdensome. I would ask you to go to a Lowe's store or a Wal-mart, they are not requiring masks and less than 25% of their shoppers wear a mask into the store. As an employer, how do you ask me to regulate that type of disconnect?

I feel as though this document is not consistent with the current orders in place. This is the document that should have been in place when we originally went into lockdown but is too stringent for where we are in Phase 2. Our employees have re-gained to many of their normal activities to ask an employer to implement this stringent of a requirement.

I have already notified my staff that if this is the final regulation that we will not bring anyone back into the workplace prior to January 1, 2021. I have not notified my staff

that this regulation is likely to trigger the start of an effort to downsize staff and lay people off. You need to understand that the timing of this document comes at the same time that employers have utilized their PPP Loan money and are no longer required to maintain their staff to get full forgiveness of the loan.

I appreciate your consideration. Thanks.

Chris Carey
President
Metis Holdings, Inc.