

## HOUSING AUTHORITY CITY OF MILWAUKEE

### Department of Human Resources

#### POLICY AND ADMINISTRATIVE GUIDELINES CONSIDERATIONS RELATED TO THE CORONAVIRUS (COVID-19)

Effective Date: March 17, 2020

Updated Date: March 31, 2020

The Housing Authority of the City of Milwaukee has developed this Policy and Administrative Guidelines to address employment and workplace considerations related to the novel coronavirus, COVID-19. This document attempts to provide clarity about policies, practices and procedures that may be impacted in response to COVID-19. We anticipate that the content of this document will continue to evolve as new information becomes available and based on new, or changes to, guidance provided by the Centers for Disease Control (CDC), the EEOC, the Wisconsin Department of Health (DHS), and the Milwaukee Health Department (MHD).

As indicated by the CDC, the guidance provided by this Policy focuses on leave policies, teleworking options, encouraging or requiring employees with flu-like symptoms to stay at home, communicating personal protective measures among staff including hand washing and respiratory etiquette, enhanced environmental cleaning, and ensuring hand hygiene supplies are available.

The Authority is monitoring the federal government's actions to provide relief to individuals suffering physically, financially, and emotionally from the pandemic. We will review and analyze the final legislation and determine if additional changes are necessary.

If you have questions about the content of this document or concerns about information that is not addressed in this document, please contact Human Resources at extension #5886.

#### **POLICY STATEMENT**

The safety of our workforce and community is our highest priority. The Authority is committed to providing employees a safe and healthy work environment. Together we share a responsibility to help prevent the spread of illnesses in our community. Employees have an obligation to practice the CDC and Wisconsin Department of Health Services recommendations to help keep the spread of the virus to a minimum.

Managers and supervisors are expected to adhere to the guidance provided by this Policy and Administrative Guidelines in responding to employee concerns and questions. Department leadership has a responsibility to ensure compliance with all applicable provisions of these guidelines including those that require greater flexibility in determining schedules, work assignments, locations, scheduling and use of paid time off, and other related employment matters. The Policy and Administrative Guidelines apply to all employees of the Housing Authority of the City of Milwaukee (HACM) and its subsidiaries.

#### **HOW TO PREVENT THE SPREAD OF THE VIRUS**

Practicing good infection prevention behaviors creates good habits that will help prevent the spread of the virus during an outbreak. Prevention continues to be the priority at this time, especially because we are still in- the middle of cold and flu season. All employees – regardless of symptoms – are expected to take action to help prevent the spread of COVID-19. The symptoms that are currently being seen with COVID- 19 are fever and respiratory symptoms such as cough and shortness of breath. To help keep the spread off the virus to a minimum employees are asked to:

- Wash your hands often with soap and water for at least 20 seconds, especially after going to the bathroom, before eating, and after blowing your nose, coughing, or sneezing.
- Cover your nose and mouth with a tissue when coughing or sneezing (or an elbow or shoulder if no tissue is available)
- Avoid close contact with people who are sick
- Avoid touching your eyes, nose, and mouth with unwashed hands
- Clean and disinfect frequently touched objects and surfaces
- Use an alcohol-based hand sanitizer with at least 60% alcohol if soap is not available
- Stay home if they have symptoms of acute respiratory illness or a fever of 100.4 degrees or higher.

### **ADDITIONAL PREVENTION MEASURES**

Under applicable state regulations, the Authority has a general duty to furnish a place of employment that is free from recognized hazards that can cause harm or injury to the employees. The Authority is taking precautionary measures to comply with these regulations to protect, to the best of our ability, our employees.

**Facilitate infection control practices:** The Authority will make display posters available for distribution throughout workplaces that remind employees of the proper hand washing, respiratory hygiene, and cough etiquette to help prevent the transmission of this virus in the workplace.

**Social Distancing:** Viruses like COVID-19 are primarily spread by respiratory droplets expelled by coughs and sneezes. These droplets travel less than 6 feet before dropping out of the air due to gravity. Therefore, strategies of social distancing, staying about 6 feet or more away from other people, can be one of the most effective strategies to keep from becoming infected or spreading infection to others.

### **MANAGING TRAVELERS**

Departments and employees should check The Center of Disease Control (CDC) Traveler's Health Notices for the latest guidance and recommendations for each country to which they travel. This information is available at <https://www.cdc.gov/coronavirus/2019-cov/travelers/index.html>.

Official Authority travel must comply with the applicable guidance from The Center of Disease Control (CDC), the DHS and the MHD. *Note: Effective immediately, until further notice, all official travel out of the state has been suspended per Tony Pérez, Secretary Executive Director.*

Per CDC guidelines and The Milwaukee Health Department (MHD) recommendation, employees will be asked to self-quarantine at home for 14 days and monitor for symptoms of COVID-19 (including fever and cough) when they return from a country with a Level 3 Travel Health Notice or from a state or geographic area with sustained community transmission. For information visit <https://www.dhs.wisconsin.gov/disease/covid-19.htm>.

Depending on the location of a cruise, an employee may be required to self-quarantine as well. If the situation arises, contact Crystal Reed-Hardy at x5886 or [chardy@hacm.org](mailto:chardy@hacm.org) and HR will obtain a determination from the Health Department as to the requirements of the specific situation.

Upon implementation of this Policy departments may ask employees whether the employee has traveled to any of the high risk areas identified by the CDC. Employees who have traveled to any of the identified areas on HACM or personal business prior to the implementation of this policy will be subject to quarantine requirements. If the employee is not able to work remotely, paid time off benefits (including borrowed vacation, if available) may be used. Unpaid time off may also be used by employees subject to provisions of the Fair Labor Standards Act.

Travel on personal business to any of the areas identified above after the implementation of this Policy may result in additional restrictions to be determined by the MHD or HR as appropriate.

## **EMPLOYEES WITH SYMPTOMS, EXPOSURES AND EXCLUSION FROM WORK**

An important way to reduce the spread of both seasonal flu and COVID-19 is to actively encourage sick employees to stay home. Currently, in any of the following situations, employees can be carried on payroll using sick leave and all other accrued balances before going into unpaid status.

In accordance with this Policy employees will be required to self-quarantine at home for 14 days from the date of contact if they have had direct contact. Direct contact means contact that is greater than 6ft distance with a +COVID-19 case for a prolonged period of time (usually described as 10 minutes or more). In addition, in order to ensure compliance with CDC, DHS, and minutes or more. MHD guidance, HACM is implementing the following protocols:

**When employees call in sick:** ordinarily, HACM does not inquire into the details of an illness when an employee calls in sick; however, requesting information about the reason for the absence in order to protect the rest of the workforce during a coronavirus-like event is acceptable to avoid wide community spread provided that the question is restricted to whether the employee is experiencing flu-like symptoms, such as fever or chills and a cough or sore throat. If the employee is experiencing flu-like symptoms, the department will inform the employee that return to work will be allowed when the employee has had no fever for **72 hours** without fever-reducing medication and is no longer displaying other symptoms of the flu-like illness **AND at least 7 days have passed since symptoms first appeared.**

**When employees have flu-like symptoms upon arrival to work or become sick during the day: Symptoms of COVID-19 include a fever or flushed appearance, dry cough, and shortness of breath, aches and pains, fatigue, and sore throat.** Employees in the workplace who exhibit the above symptoms should be separated from other employees and **directed** to go home and stay at home until they have been fever-free for **72 hours** without fever-reducing medicine, and are no longer displaying other symptoms of the flu-like illness **AND at least 7 days have passed since symptoms first appeared.**

**When an employee is identified by a medical provider or a public health authority as a potential exposure to a confirmed case as defined by the CDC's most recent criteria:** the employee will be quarantined and will be required to stay at home for 14 days and monitor for symptoms. If symptoms develop or the employee tests positive for COVID-19, the employee will remain in isolation until a determination is made by the public health authority, in coordination with the CDC, that the individual is no longer infectious.

**When an employee is diagnosed with COVID-19:** the employee must follow medical orders and will remain in isolation until he or she is fever free for 72 hours without fever reducing medicine and is no longer displaying other symptoms AND at least 7 days have passed since the symptoms first appeared. Notification of return to work protocols can be coordinated with the Human Resource Department.

Recommended precautions by the CDC for household members when an employee has tested positive for COVID-19 can be found at: <https://www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-prevent-spread.html>

In addition, information regarding self-quarantine/isolation can be found at: <https://www.dhs.wisconsin.gov/covid-19/diagnosed.htm>

## **PROTOCOL FOR EMPLOYEE NOTIFICATION AND DEPARTMENTAL RESPONSE TO EMPLOYEES WITH SYMPTOMS, A PROBABLE CASE OR A CONFIRMED CASE OF COVID-19**

HACM is working diligently to protect the health and safety of its employees and that of the general public following guidance from the proper public health authorities. In conjunction with this effort, a protocol documenting employee notification and departmental response requirements has been developed to address the following situations:

The employee has been in contact with someone who was exposed but neither individual is showing symptoms.

1. The employee has been in Close Contact with someone who has been diagnosed with COVID-19.
2. The employee reports to work with symptoms of COVID-19, develops symptoms while at work, or calls in sick with symptoms consistent with COVID-19
3. The employee has tested positive for COVID-19.

The protocol can be found at: <https://www.hacm.org/Home/ShowDocument?id=6835>

### **ATTENDANCE POLICIES, SICK LEAVE PROCEDURES AND RETURN TO WORK CERTIFICATES**

Given the need to minimize the spread of COVID-19, employees who are sick should consult with their health care providers by phone before visiting the office or may seek guidance from the Workplace Clinic. UHC's virtual visits are also available to screen symptoms and obtain recommendations regarding the most appropriate care.

**The City's Workplace Clinic:** [https://city.milwaukee.gov/ImageLibrary/User/jkamme/Wellness/Wellness\\_WorkplaceClinic.pdf](https://city.milwaukee.gov/ImageLibrary/User/jkamme/Wellness/Wellness_WorkplaceClinic.pdf) is able to assess symptoms and recommend best care options given each individual's presenting symptoms.

**UHC Virtual Visits:** HACM employees and their families are encouraged to use virtual visits as a front line screening resource when they experience flu-like symptoms. Referrals to further in person screening or care will be provided as needed. To talk to a doctor 24/7 call 1-855-615-8335 | Visit myuhc.com.

**HUMANA Virtual Visits:** Travaux Inc, and Crucible Inc. employees and their families are encouraged to use virtual visits as a front line screening resource when they experience flu-like symptoms. To talk to a doctor download the app *drs on demand*.

**Temporary Relaxation of Attendance Policies and Sick Leave Procedures:** departments should also consider adjusting standards and definitions of unexcused absences for absences related to this outbreak. A temporary relaxation of attendance policies and sick leave procedures may encourage ill employees stay home from work, which is in line with the CDC and DHS recommendations. Employees must understand that decisions to relax the aforementioned protocols may be temporary and will cease to be in effect at the discretion of the Department Head.

Sick Leave Policy: HACM is directing departments to relax sick leave control protocols and not count absences due to quarantine or isolation orders, flu-like symptoms, or absences related to school closures, as occurrences.

Return to Work Certificates: consistent with CDC recommendations, HACM is directing departments to relax medical certification requirements for absences related to flu-like symptoms as a way to decrease the strain on healthcare systems. CDC guidance indicates that workers suffering from fever or respiratory illness stay home until they have been free of symptoms for 72 hours or have been cleared to report to work by a medical professional.

However in accordance with department specific work rules, a medical certificate may be required:

- for any FMLA qualifying event
- any absence of more than 3 days, for illness or injury other than flu-like illness
- any absence where sick leave is exhausted, for illness or injury other than flu-like illness

**When Sick Leave is not available:** Employees who run out of sick leave should be allowed to borrow vacation hours consistent with applicable regulations. We are also monitoring the federal government's efforts in this regard as legislation to address pay relief for employees who are ill, quarantined or are caring for others who are ill.

### **REFUSING TO WORK DUE TO CONCERNS ABOUT EXPOSURE TO COVID-19**

Generally an employee who refuses to work will not be paid and may be disciplined. However, situations involving high risk employees as defined by CDC, or other special circumstances, such as employees with already compromised immune systems or chronic medical conditions will be addressed on a case-by-case basis in accordance with applicable laws. Employees may also be permitted to work remotely in accordance with the department's protocols.

### **ADA CONSIDERATIONS**

Based on the medical information available at this time, COVID-19 on its own likely would not qualify as a disability under the Americans with Disabilities Act. In most cases, people infected with COVID-19 recover after a week or two, or up to several weeks depending on the severity of the illness. However, depending on the duration of the illness, COVID-19 may qualify as an ADA-recognized disability. Employees may also develop a disability from COVID-19 or aggravate a pre-existing disability. Employees with a disability are entitled to a reasonable accommodation, provided it does not cause an undue hardship or direct threat to health and safety.

**Disability related inquiries:** Under the ADA managers are restricted from making medical inquiries into an employee's medical status. However such inquiries may be permitted in order to protect the workforce during a coronavirus-like event. If the department has a reasonable belief that an employee poses a direct threat to the health or safety of others in the department the inquiry is permitted under the law. However such inquiry needs to be done in consultation with the HR Director.

Maintain the confidentiality of medical information received: all information about employee illness must be maintained as a confidential medical record in compliance with the ADA.

It is important to remember that during an influenza pandemic, there is community-wide transmission of the virus and the general workplace should not pose a greater risk than the risk of exposure while conducting daily activities in the community. People may be exposed anywhere — at work, at the grocery store, at the bank or anywhere they go.

However, since the MHD has declared a public health emergency given evidence of community transmission, departments are now required to:

1. Notify employees within their department of any confirmed case of COVID-19 reported by an employee. Inform employees that contact tracing will be performed by MHD. Employees who need to be quarantined per CDC guidelines will be notified accordingly.

2. Notify employees within their department of any exposure to a confirmed case by an employee and provide information about steps implemented in response to the notification and information on how to self-monitor for symptoms. For information on how to self-quarantine and self-monitor for symptoms please visit <https://www.dhs.wisconsin.gov/disease/covid-19.htm>.
3. Notify employees within their department that an employee is experiencing symptoms of COVID-19 (fever of 100.4, cough, shortness of breath) and that the employee has been asked to go home to self-quarantine for 14 days.

Reasonable Accommodations: departments may have employees with chronic health conditions that may provide a medical certificate indicating that they should not be at work because they are high risk for COVID-19. These situations do not appear to be covered by the newly enacted Families First COVID-19 legislation. We will be treating those as requests for accommodations under the ADA.

Please note that typically, it is not a reasonable accommodation to be absent from work indefinitely due to a chronic health condition but if someone has a chronic health condition and the doctor has indicated to stay home, they may be allowed under the ADA to stay home and use sick time (or go unpaid if they run out of sick time) for the extent of the COVID-19 pandemic (not indefinitely). Also according to the CDC older adults and people who have severe underlying medical conditions like heart or lung disease or diabetes seem to be at higher risk for developing more serious complications from COVID-19 illness. Please take this into account as employees approach you with relevant concerns.

For the most current information from the CDC on people who are at higher risk for severe illness please visit: <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-at-higher-risk.htm>

As always, ADA requests should be handled on a case-by-case basis. If leave is granted as an accommodation under the circumstances of an employee having a condition that causes the employee to be at greater risk due to the COVID 19 pandemic, long increments of time should not be granted, as the scope of the pandemic changes very rapidly. Depending on the situation, leave could be granted in increments of 2 weeks or 3 week periods with the option for an employee to request an extension; or HR can check on the status every 2-3 weeks, depending on what is going on with the COVID 19 pandemic in the Milwaukee area and the specific employee's situation.

If possible, remote work should be an option for a temporary accommodation as well. If working from home is permitted as an accommodation under the ADA, please make clear to the employee that the accommodation is temporary (for the extent of the COVID pandemic) and allowed under these special circumstances to comply with social distancing. If relevant, let the employee know that even though they are not able to perform all of the essential functions of their job at home, this temporary accommodation is an exception, given the pandemic.

**Questions about Travel:** Inquiring about whether an employee has traveled to an affected area or about possible exposure to a contagious illness during such travel would not constitute a disability-related inquiry. However, the extent to which a department may act on the information received will depend on the most recent information available from the CDC and other public health officials. Further, when you inquire into whether employees have traveled to areas identified per the CDC Traveler's Health Notices, you should do so of all employees known or believed to have recently traveled, rather than directing such inquiries only to employees of certain races, ethnicities, or national origins.

## ALTERNATIVE WORK ARRANGEMENTS AND TELECOMMUTING

With the spread of this disease, departments are asked to exercise judgment to protect employees and their families. Upon a directive by the appropriate authority, departments that are able to have employees work remotely should encourage or require them to do so. Additional measures to prevent the spread of the disease include hosting videoconferences instead of in-person meetings and canceling or rescheduling trainings, testing, and other group events.

Department Heads should work with the Authority's Information Technology Director to ensure that decisions regarding allowing work from home options are supported by the HACM telecommuting policies and that the appropriate IT infrastructure needed to ensure the security for remote work is available.

If a Department initially denies a request to telecommute or for an alternative work arrangement ("AWA"), that request can be revisited as circumstances change. Also, in situations where Departments would not normally approve telecommuting or AWAs, they are encouraged to give more leeway in granting these requests on a temporary basis given the circumstances. During this time, an employee may be assigned to work on a special project or training. Departments can also consider Alternative Work Schedules, such as working four ten-hour days, to allow for staggered shifts. Decisions regarding telecommuting options and the availability for staggered or alternative work schedules are at the discretion of the Department Heads.

When telework is not an option, paid time off requests should be given serious considerations even when they are submitted with little or no advance notice.

Many HACM positions consist of essential functions that cannot be performed remotely. The fact that not all essential functions of a position can be performed remotely does not mean that a department cannot or should not permit an employee to work remotely on a limited or temporary basis. If a department is temporarily expanding its rules on allowing employees to work from home, given the current health emergency and in an effort to limit person-to-person contact, the department should, for each employee permitted to work remotely, advise the employee what work they will be expected to perform, and document that communication, both as it is initially given, and as it may change or be modified over time. Also please advise the employee and document the fact that employees working remotely are not expected to be able to perform all of the position's essential functions, and should only concern themselves with functions they can perform remotely and other work directives given to them by their supervisor. This will be important to avoid employees having an unwarranted expectation that work from home is a viable option from a reasonable accommodation perspective in the future during non- health-emergency conditions.

## CARING FOR FAMILY MEMBERS

**Paid Time Off Options:** Earned and borrowed vacation hours should be granted to employees to care for family members who may have flu-like symptoms or who have been exposed to or diagnosed to COVID-19 ensuring maximum flexibility for allowing paid time off to care for those members is critical.

Sick leave benefits are not *currently* available to employees to care for those family members unless they qualify for FMLA. However, please note effective March 16, 2020, employees may use sick leave to care for family member, until further notice.

Emergency paid sick leave created under the FFCRA will be implemented on April 1st. Information regarding leave benefits available to care for an eligible individual under the Act will be made available the week of March 30<sup>th</sup>.

**Unpaid Time Off:** time without pay may be granted at departmental discretion to employees who have exhausted other leave balances.

**Be flexible when considering employee requests to telework or flex work schedules to care for family members who are sick with influenza or challenges associated with school-aged children needing to stay home because of school**

**closings:** While not all jobs permit this type of flexibility and some telework policies don't permit telework you are encouraged to be as flexible as possible.

## LEAVE BENEFITS

**Sick Leave:** employees who are experiencing flu-like symptoms should not report to work but should follow call-in protocols established by their departments. Paid sick leave benefits are available in accordance with Housing Authority HR Policies and Procedures. Paid sick leave will also be available to care for family members per Tony Pérez effect on March 16, 2020.

**FMLA:** Ordinarily the common cold and flu are not serious health conditions under provisions of the FMLA. However, more severe cases that require inpatient care or continuing treatment by a health care provider may meet the definitions of a serious health condition an employees may be entitled to leave under the federal or state FMLA. Employees diagnosed with COVID-19 may qualify for FMLA leave and will be provided with FMLA paperwork. Complications from the flu or other chronic medical conditions may also qualify for leave under provisions of FMLA. Please note that precautionary quarantines due to return from travel or exposure without a diagnosis likely do not involve a serious health condition and thus are unlikely to qualify for FMLA leave.

The Family First Coronavirus Response Act (FFCRA) requires the HACM to provide expanded family and medical leave for specified reasons related to COVID-19 effective April 1st. Information regarding this expansion of the FMLA will be available during the week of March 30th.

Employees and departments should consult with HR Director, Crystal Reed-Hardy by calling 414.286.5886 or emailing [chardy@hacm.org](mailto:chardy@hacm.org) to assess whether leave under FMLA for the serious health condition is available.

**Medical Leave:** employees who don't have access to paid sick leave or who are not eligible for leave under FMLA may be granted a medical leave of absence under the appropriate HACM policy. A short-term medical leave of absence may also qualify as a reasonable accommodation under the ADA.

**Staying home to avoid getting sick:** employees generally are not entitled to sick leave or FMLA or reasonable accommodation leave to stay at home to *avoid* getting sick (though exceptions may exist where a preexisting medical condition is likely to be worsened by exposure to a contagious disease). Please consult with HR if you believe you are dealing with circumstances that may be considered under such exception.

## WORKER COMPENSATION CONSIDERATIONS

Exposure to COVID-19 that is deemed to have arisen out of and in the course of employment may be eligible for worker compensation benefits, including injury pay. For claims to be compensable, however, it would have to be proven that the virus was, in fact, contracted at work, and exposure to the employee was not due to an alternative source.

## FAIR LABOR STANDARDS ACT (FLSA) CONSIDERATIONS

Before assessing how to pay employees while they are off work for COVID-19 related reasons, departments need to understand the employee's classification under the provisions of the FLSA.

**Employees subject to FLSA Provisions:** Hourly employees permitted to work remotely are required to track remote hours to limit potential wage claims. Also employees, who are required to self- quarantine for the reasons specified under applicable provisions of these guidelines, may take time without pay as necessary as regulations do not guarantee wages or hours and pay.

**Employees exempt from FLSA Provisions:** exempt employees are paid on a salary basis. This means that they must receive their full salary for any week in which the employee performs any work without regard to the number of days or hours worked. Deductions can be made when an exempt employee is absent from work for one or more full days for sickness or disability, if the employee works only a partial day because of sickness or disability, HACM cannot make deductions from the employee's salary for the lost time because the exempt employee must receive a full day's pay for the partial day worked in order for HACM to meet the "salary basis" rule. However, HACM can require an exempt employee to use available vacation or sick leave if the employee only works part of their regularly scheduled day due to sickness or disability. In summary, time away from work can be unpaid as long as it is in full-day increments if it is voluntary and initiated by the exempt employee. For time off mandated by the employer, the time away can be unpaid only in full-pay week increments.

### **PREVENTING DISCRIMINATION**

HACM is committed to providing employees with a workplace that is free of illegal bias, prejudice, discrimination, harassment, and retaliatory conduct. Employees who are experiencing any such behavior should notify their supervisor or manager immediately, or Human Resource Department.

While the HACM needs to prepare for COVID-19, we must also remain vigilant about preventing discrimination based upon race or national origin. There is no race or national origin, or other classification that makes any one individual more or less likely to acquire or spread COVID-19 than any other person.

### **UNEMPLOYMENT INSURANCE**

Unemployment benefits are generally available to individuals who are unemployed through no fault of their own. If COVID-19 causes a Department to shut down operations and no work is available, individuals may be eligible for unemployment benefits.

### **WORKPLACE PREPAREDNESS**

Departments need to consider how to best decrease the spread of acute respiratory illness and lower the impact of the coronavirus in their workplace. This may include preparing for possible increased numbers of employees absent due to their own illness or that of family members, dismissals of early childhood programs and schools due to high levels of absenteeism.

Departments should develop or revisit contingency and business continuity plans. Plans should project and plan for minimum staffing levels, document communication protocols and ways to share important information regarding services and should be prepared to re-schedule or cancel presentations, trainings, or events that result in large gatherings as a precaution. Other considerations related to departmental operations include:

1. Determine if the departments should continue to accept walk-ins or develop by appointment only service delivery.
2. When staff is visiting residences or commercial properties, schedule visit and screen for exposure potential using CDC guidelines.
3. Avoid or cancel in person group meetings and trainings.
4. Identify priority operations and who staffs them
5. Identify personnel who is able/unable to telecommute
6. Coordinate with IT to ensure appropriate security for remote work (including the security of computers, tables, and cell phones)
7. Consider building up inventory for essential goods and services.
8. Communicate with vendors and suppliers as necessary

9. Develop communication protocols for employees working remotely and those who are ill.
10. Plan for extended absences and replacement workers as necessary.
11. Determine if reduced or staggered schedules are an option consistent with social distancing strategies.
12. Consider using skype and phone interviews instead of in person interviews.
13. Consider implementing a restricted access process and/or SELF DECLARATION BY VISITOR process for guests, independent contractors, suppliers.

Questions or concerns should be directed to your immediate supervisor or your HR representative.

The interpretation and application of the procedures described here, minus those guided by Federal and State law, are ultimately within the discretion of the Authority. HACM reserves the rights to alter, add, reduce, or eliminate any procedure in whole or in part, without notice. These procedures are not a contract and should not be construed to impose any contractual obligation, expressed or implied, or to affect the employee's "at will" status.