



COVID-19 Preparedness & Response Plan For Lower and Medium Exposure Risk Employers

General

The following COVID-19 preparedness & response plan has been established for Macomb Academy 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.

The EOs, OSHA guidance, and CDC guidance for COVID-19 have general safeguards applicable for all workplaces and specific safeguards for certain industries. Anne-Marie Sladewski, Macomb Academy Executive Director, has read these guidance documents carefully, found the safeguards appropriate to Macomb Academy 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. Anne-Marie Sladewski, Macomb Academy Executive Director, 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.](#) This plan reflects the EOs and CDC guidance as of August 3, 2020.

Anne-Marie Sladewski, Macomb Academy Executive Director, has designated one or more worksites supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The worksite supervisor(s) is Anne-Marie Sladewski, Macomb Academy Executive Director and Pam Miller, Business Manager. 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 website and hard copy, by request.

Exposure Determination

Macomb Academy has evaluated routine and reasonably anticipated tasks and procedures for all employees to determine whether there is actual or reasonably anticipated employee exposure to SARS-CoV-2. Anne-Marie Sladewski, Macomb Academy Executive Director, was responsible for the exposure determination.

Macomb Academy 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.
- **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 SARS-CoV-2, 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.

Anne-Marie Sladewski, Macomb Academy Executive Director, verifies that Macomb Academy 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. This sample plan is not intended for employers who have high exposure risk jobs.

Macomb Academy has categorized its jobs as follows:

(NOTE: Some jobs may have more than one type of exposure risk depending on the task or qualifying factors.)

| Job/Task | Exposure Risk Determination (Lower or Medium) | Qualifying Factors (For Example, No Public Contact, Public Contact) |
|--------------------------------------|--|---|
| Executive Director | Medium | Requires frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients |
| Executive Assistant/Business Manager | Medium | Requires frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients |
| Records Secretary | Medium | Requires frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients |
| Building Manager | Medium | Requires frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients |
| Teacher | Medium | Requires frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, but who are not |

| | | |
|--|--------|---|
| | | known or suspected COVID-19 patients |
| Paraprofessional/Classroom and Job Coach | Medium | Requires frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients |
| Substitute | Medium | Requires frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients |
| Vendor Services | Medium | Requires frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients |

Engineering Controls

Macomb Academy has implemented feasible engineering controls to minimize or eliminate employee exposure to SARS-CoV-2. 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.
- Installing a drive-through window for customer service.
- Increasing the amount of ventilation in the building.
- Increasing the amount of fresh outdoor air that is introduced into the building.

Anne-Marie Sladewski, Macomb Academy Executive Director, 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:

| Job/Task | Engineering Control |
|----------------------------|--|
| Macomb Academy Main Office | Clear plastic barrier between office staff and Macomb Academy community |
| Classrooms | Tables Separated and facing the front and clear plastic barrier between tables |
| Signage | Masks, Distancing, Handwashing; Limiting visitors |
| Distancing | Markers on floor; Limited seating in common areas; suspend drinking fountain use |
| Hygiene | Hand sanitizing stations throughout building |
| Cleaning | Thorough cleaning daily; desks and chairs after each class; hourly schedule for commonly touched surfaces and frequently used areas; individual cleaning of area used before leaving area. |

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazards. Anne-Marie Sladewski, Macomb Academy Executive Director, 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 Macomb Academy:

(Choose the controls below that are feasible for your workplace. Delete the controls that are not feasible or applicable. Add additional rows for other feasible administrative controls that will be implemented. In the first column, indicate which jobs or tasks will use each administrative control.)

| 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. |
| 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 establishment 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 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 | Maintain flexible policies that permit employees to stay home to care for a sick family member. |

Hand Hygiene

Anne-Marie Sladewski, Macomb Academy Executive Director, will be responsible for seeing that adequate handwashing facilities are available in the workplace 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 SARS-CoV-2. When handwashing facilities are not available, Macomb Academy shall provide employees with antiseptic hand sanitizers or towelettes. Macomb Academy will provide time for employees to wash

hands frequently and to use hand sanitizer.

Disinfection of Environmental Surfaces

Macomb Academy 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, vehicles). Macomb Academy will make cleaning supplies available to employees upon entry and at the worksite.

Anne-Marie Sladewski, Macomb Academy Executive Director, 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 SARS-CoV-2. When choosing cleaning chemicals, Macomb Academy 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 SARS-CoV-2 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 |
|--|--|--|
| Frequently Touched Surfaces (light switches, doors, lockers) | EPA Approved Disinfectant or Diluted Bleach Solution | As used by individuals; hourly cleaning schedule |
| Classroom Tables, Desks and Chairs | EPA Approved Disinfectant or Diluted Bleach Solution | End of each class period; end of the morning; end of the afternoon |
| Bathrooms | EPA Approved Disinfectant or Diluted Bleach Solution | After individual use; Hourly |
| Computers; Hands-On Classroom Materials; Supplies | EPA Approved Disinfectant or Diluted Bleach Solution | After each use |
| Conference Room; Break Room Table and Chairs and Surfaces | EPA Approved Disinfectant or Diluted Bleach Solution | After each use |
| Office Area | EPA Approved Disinfectant or Diluted Bleach Solution | Individual work stations/after each use; and offices at the end of the day |

Macomb Academy 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. Anne-Marie Sladewski, Macomb Academy Executive Director, will be responsible for seeing that this protocol is followed.

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

- Electrostatic Spray: use in common areas and classrooms in between different groups use or in between use of the same cohort.
- Chloride Dioxide wide-form spray (lasts 1 day): use at the end of the day after all staff are out of the building.
- CoverShield: 24/7 protection; lasts 60 days on frequently used/cleaned surfaces (tables, door handles) and lasts a lifetime on walls until repainted: spray entire building when no one is in the building.

Personal Protective Equipment (PPE)

Macomb Academy will provide employees with personal protective equipment for protection from SARS-CoV-2 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.

Macomb Academy will provide non-medical grade face coverings (cloth face coverings) to employees. (Cloth face coverings are technically not considered PPE.) Macomb Academy will require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace. Macomb Academy 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 |
|---|--|
| Executive Director | Mask (mandatory); gloves and shield, as needed |
| Executive Assistant/Business Manager | Mask (mandatory); gloves and shield, as needed |
| Records Secretary | Mask (mandatory); gloves and shield, as needed |
| Building Manager | Mask (mandatory); gloves and shield, as needed |
| Teachers | Mask (mandatory); gloves and shield, as needed |
| Paraprofessionals/Instructional Support in the classroom and school environment, and instructional support in the community for employment training | Mask (mandatory); gloves and shield, as needed |
| Vendors for Contract Services | Mask (mandatory); gloves and shield, as needed |

Health Surveillance

Macomb Academy 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. Anne-Marie Sladewski, Macomb Academy Executive Director, 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, Macomb Academy will have employees self-screen for COVID-19. Macomb Academy will have employees complete 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. Macomb Academy 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 Anne-Marie Sladewski, Executive Director or Pamela Miller, Executive Assistant/Business Manager, before and during the work shift. Macomb Academy has provided employees with instructions for how to make such a report to the employer.

The specific instructions for employee reporting signs and symptoms of COVID-19 are as follows:

- Cooperate with the local public health department regarding implementing protocols for screening staff.
- Staff who develop a fever or become ill with COVID-19 symptoms at school will be quarantined. They should wear a mask and transport themselves, or be transported by their emergency contact, or ambulance if clinically unstable, for off-site testing.
- Staff who develop a fever or become ill with COVID-19 symptoms at school should wear a mask and be transported for off-site testing.
- Symptomatic staff sent home from school should be kept home until they have tested negative for

COVID-19, or have been released from isolation according to CDC guidelines.

- Staff will be notified of the presence of any laboratory positive or clinically diagnosed cases of COVID-19 in the building to encourage closer observation of themselves for any symptoms at home.
- In the event of a lab or clinically diagnosed case of COVID-19, immediate efforts will be made to contact any close contacts (those who spent more than 15 minutes less than six feet in close proximity to the staff member) so that they can be quarantined for 14 days at home. Students will be closely monitored for any symptoms of COVID-19. At this time, empiric testing of all staff members in the building is not recommended. Only those that develop symptoms require testing for COVID-19.
- Staff members are encouraged to check their temperature at home every morning using oral, tympanic (ear), or temporal scanners; staff with a temperature of 100.4 or greater must stay home and consider coronavirus testing.
- Staff are encouraged to monitor for symptoms of COVID-19. The presence of any unexplained symptoms, including cough or shortness of breath, should prompt the staff member to stay home and to follow up with their primary care provider.
- Notify local health officials immediately of any possible case of COVID-19 while maintaining confidentiality consistent with the Americans with Disabilities Act (ADA) and other applicable federal and state privacy laws.
- The Local Health Department will initiate contact tracing, following regular public health practice. Anyone who was within close contact of the case (less than six feet apart for 15+ minutes) will be asked to self-quarantine for up to 14 days after exposure. Local health officials, depending on the situation, may identify other contacts who require quarantine. Schools can help the local health department by collecting data and contact information of those exposed.
- Macomb Academy will provide staff with guidance on confidentiality laws and statutes that protect staff health information. Staff communicable disease related information is protected health information. (Even if a staff member acknowledges and publicly discloses a positive test, school staff and officials must not participate in discussions or acknowledge a positive test).
- Employees with a confirmed case of COVID-19 should only return to the workplace after they are no longer infectious. Local health officials will provide instruction about return to work, using the most current guidelines from the CDC for this determination.

Macomb Academy 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.

Macomb Academy 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, Anne-Marie Sladewski, Macomb Academy Executive Director, 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, Macomb Academy will not reveal the name or identity of the confirmed case.

Macomb Academy 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

Anne-Marie Sladewski, Macomb Academy Executive Director, shall coordinate SARS-CoV-2 training and ensure

compliance with all training requirements.

Macomb Academy 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.

Anne-Marie Sladewski, Macomb Academy Executive Director, 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

Macomb Academy 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.

Anne-Marie Sladewski, Macomb Academy Executive Director, will ensure that the records are kept.

FREE ONSITE CONSULTATION SERVICE FOR EMPLOYERS

To help employers better understand and voluntarily comply with the MIOSHA Act, free Onsite Consultation programs are available to help small employers Identify and correct potential safety and health hazards



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Consultation Education and Training Division
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