

# COVID-19 Preparedness & Response Plan

## For Lower and Medium Exposure Risk Employers ONLY

### ✔ General

The following COVID-19 preparedness & response plan has been established for Waldron Area Schools in accordance with MIOSHA Emergency Rules for Coronavirus disease 2019 (COVID-19), 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 Emergency Rules, OSHA guidance and CDC guidance for COVID-19 have general safeguards applicable for all workplaces and specific safeguards for certain industries. Mike Potts, Superintendent, has read these guidance documents carefully, found the safeguards appropriate to Waldron Area Schools 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, [OSHA](#) and [CDC](#) guidance are periodically updated. Jenn Fether and Jon Burk will be responsible for visiting these guidance webpages regularly (for example, weekly) for the latest information and for revising the plan as necessary. This plan reflects the EOs and CDC guidance as of 10/12/2020.

Waldron Area Schools 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 Jenn Fether and Jon Burk. 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 in the administration office.

## ✓ Exposure Determination

Waldron Area Schools 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. Mike Potts was responsible for the exposure determination.

Waldron Area Schools 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.

Mike Potts verifies that Waldron Area Schools 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.

Waldron Area Schools 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.

<b>Job/Task</b>	<b>Exposure Risk Determination (Lower or Medium)</b>	<b>Qualifying Factors (Ex. No Public Contact, Public Contact)</b>
Teachers	Medium	Student Contact
Teacher Aides	Medium	Student Contact
Administration	Medium	Public and Student Contact
Maintenance	Low	Minimum Student Contact
Custodial	Medium	Student Contact
Bus Drivers	Medium	Student Contact
Cafeteria	Medium	Student Contact
Coaching Staff	Medium	Public and Student Contact

### ✓ **Engineering Controls**

Waldron Area Schools 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.

Jon Burk 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:

<b>Job/Task</b>	<b>Engineering Control</b>
Cafeteria	Plexiglas barrier at serving station
Main Office	Plexiglas barrier at serving station
Ventilation	Adjust economizer to allow fresh air into classrooms, daily.
Bathroom Cleaning	Utilizing a cleaning sprayer device to clean and disinfect bathrooms without having to touch surfaces.

### **Administrative Controls**

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. Jenn Fether 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 Waldron Area Schools:

(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.)

<b>Job/Task</b>	<b>Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)</b>
All employees	Maintain at least six feet from everyone on the worksite.
Director of Operations	Use ground markings, signs, and physical barriers to prompt employees to remain six feet from others.
Principal and teachers	Promote remote work (telecommuting) to the fullest extent possible.
Superintendent and Principal	Restrict face-to-face meetings. Communicate with others through phone, email, teleconferencing, and web conferencing.

Director of Operations	Minimize the sharing of tools, equipment, and items.
Director of Operations/Administration	Provide employees with non-medical grade face coverings (cloth face coverings).
Superintendent	Require employees to wear cloth face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.
Superintendent	Require visitors to wear cloth face coverings.
School Health Professional	Keep visitors informed about symptoms of COVID-19 and ask sick visitors to stay at home until healthy again.
Director of Operations Administration	Provide visitors with tissues and trash receptacles.
Administration	Encourage visitors and parents to utilize the district website, mobile app, and social media for information as opposed to coming to the building.
School Health Professional and Teachers	Encourage proper cough and sneeze etiquette by employees and students, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands.
Superintendent/HR	Ensure that sick leave policies are flexible and consistent with public health guidance, so employees do not go to work sick.
Superintendent/HR	Do not require a healthcare provider's note for employees who are sick with acute respiratory illness to validate their illness.
Superintendent/HR	Maintain flexible policies that permit employees to stay home to care for a sick family member.

### ✔ Hand Hygiene

Jon Burk 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, Waldron Area Schools shall provide employees with antiseptic hand sanitizers or towelettes. Waldron Area Schools will provide time for employees to wash hands frequently and to use hand sanitizer.

### ✔ Disinfection of Environmental Surfaces

Waldron Area Schools 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). Waldron Area Schools will make cleaning supplies available to employees upon entry and at the worksite.

Jon Burk will be responsible for seeing that environmental surfaces 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, Waldron Area Schools 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:

<b>Surface</b>	<b>Method/Disinfectant Used</b>	<b>Schedule/Frequency</b>
Desks	Clorox Wipes or Disinfectant	Hourly
Bathrooms	Disinfectant Sprayer	Early morning and mid day
Door Handles	Disinfectant Spray	Evening
Cafeteria Tables	Disinfectant Cleaner	Twice per day

Waldron Area Schools 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. Jon Burk will be responsible for seeing that this protocol is followed.

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

- Disinfect and detail clean entire affected work area immediately.
- Relocate employees and/or students to a different area of the building.
- Disinfect and detail clean areas where person confirmed with COVID-19 had gone to throughout building.

- Coordinate with Kalamazoo Sanitary Supply (KSS (district environmental supply provider)) or local health department for further guidance.

### ✔ Personal Protective Equipment (PPE)

Waldron Area Schools 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.

Waldron Area Schools will provide non-medical grade face coverings (cloth face coverings) to employees (cloth face coverings are technically not considered PPE). Waldron Area Schools will require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace. Waldron Area Schools 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:

<b>Job/Task</b>	<b>PPE</b>
All Employees	Disposable Surgical Masks
Teachers	Clear Disposable Facial Masks
Employees with a medical waiver for facial masks	Face Shields
Custodial and Maintenance	Latex Gloves
Cafeteria	Plexiglas Partitions

## ✔ Health Surveillance

Waldron Area Schools 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. Vickie Lee and Jenn Fether 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, Waldron Area Schools will screen employees for COVID-19. Waldron Area Schools 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. A no-touch thermometer will be used for temperature screening of employees. Waldron Area Schools 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 Mike Potts and Jack Ledford before and during the work shift. Waldron Area Schools 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:

- Provide a notification of symptoms consistent with COVID-19 to the employee, recommending they contact their health professional.
- Provide a notification letter to parents and community regarding a positive COVID-19 staff member or student.
- Provide FFCRA leave paperwork to employee.

Waldron Area Schools 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.

Waldron Area Schools 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, Mike Potts or Jenn Fether 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, Waldron Area Schools will not reveal the name or identity of the confirmed case.

Waldron Area Schools 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

Jenn Fether shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

Waldron Area Schools will train workers on, at a minimum:

- Workplace infection-control practices.
- The proper use of personal protective equipment.
- Steps the employee must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
- How to report unsafe working conditions.

Jenn Fether shall create a record of the training. Records should include the name of the employee(s) trained and the date of the training.

## ✔ Recordkeeping

Waldron Area Schools will maintain records of the following requirements:

- Training. The employer shall maintain a record of all COVID-19 employee training.
  
- Screening protocols. The employer shall maintain a record of screening for each employee or visitor entering the workplace.
  
- 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.

Vickie Lee and Jenn Fether 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.

Michigan Occupational Safety and Health Administration  
Consultation Education and Training Division  
530 W. Allegan Street, P.O. Box 30643  
Lansing, Michigan 48909-8143

For further information or to request consultation, education and training services call 517-284-7720 or visit our website at [www.michigan.gov/miosha](http://www.michigan.gov/miosha).

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