

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 the Huron School District in accordance with MIOSHA Emergency Rules for Coronavirus disease 2019 (COVID-19). The purpose of this plan is to minimize or eliminate employee exposure to SARS-CoV-2.

The Emergency Rules have general safeguards applicable for all workplaces and specific safeguards for certain industries. The Superintendent has read these emergency rules carefully, developed the safeguards appropriate to the Huron School District based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

The Huron School District 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 the Buildings and Grounds Supervisor. 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 our employees and their representatives. The plan will be made available via www.huronschools.org or can be requested as a hard copy, available in the Huron School District Central Office.

✔ Exposure Determination

The Huron School District 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. The Superintendent was responsible for the exposure determination.

The Huron School District 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.

The Superintendent verifies that the Huron School District 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.

The Huron School District 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 (Ex. No Public Contact, Public Contact)
Cooks, Cook Assistants, Assistant Food Facilitator & Food Facilitator	Medium	Public Contact
Support Staff Aides	Medium	Public Contact
Clerical Secretaries	Medium	Public Contact
Bus Drivers, Assistant Bus Drivers, Bus Aides, & Transportation Facilitator	Medium	Public Contact

Custodian	Medium	Public Contact
Maintenance I, II, III, & Mechanics	Medium	Public Contact
Master Mechanics & Mechanic Helper	Medium	Public Contact
Teacher	Medium	Public Contact
Administrator/Central Office/Director	Medium	Public Contact

✔ Engineering Controls

The Huron School District 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.

The Building and Grounds Supervisor 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
Teachers	Plexiglass barriers installed
Clerical Secretaries	Plexiglass barriers installed
All Staff	Increase amount of fresh air intake using

	existing HVAC units.

✔ Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. The Superintendent 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 Huron School District:

(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	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.

✔ Hand Hygiene

The Buildings and Grounds Supervisor 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, the Huron School District shall provide employees with antiseptic hand sanitizers or towelettes. The Huron School District will provide time for employees to wash hands frequently and to use hand sanitizer.

The Huron School District shall promote frequent and thorough hand washing, including by providing workers, customers, and worksite visitors with a place to wash their hands. If soap and running water are not immediately available, provide antiseptic hand sanitizers or alcohol-based hand towelettes containing at least 60 percent alcohol.

✔ Disinfection of Environmental Surfaces

The Huron School District 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). The Huron School District will make cleaning supplies available to employees upon entry and at the worksite.

The Buildings and Grounds Supervisor 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, The Huron School District 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 Items in Classrooms	3M Disinfectant Cleaner RCT	After Every Class Period
Bathrooms	3MTM Disinfectant Cleaner RCT & Electrostatic Sprayer	Minimum Every 4 Hours
Classrooms	3MTM Disinfectant Cleaner RCT & Electrostatic Sprayer	Nightly
Offices	3MTM Disinfectant Cleaner RCT & Electrostatic Sprayer	Nightly
Hallways/Lockers	Electrostatic Sprayer – 3M Disinfectant Cleaner RCT	Minimum, every 4 hours
Buses	3M Disinfectant Cleaner RCT	After Every Group of Students – Between Runs
Buses	Electrostatic Sprayer – 3M Disinfectant Cleaner RCT	Between Runs

The Huron School District 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. The Buildings and Grounds Supervisor will be responsible for seeing that this protocol is followed.

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

Any time enhanced disinfection is needed additional spraying with Electrostatic sprayer will be performed of entire room.

✔ Personal Protective Equipment (PPE)

The Huron School District will provide employees with the types of personal protective equipment, including respirators if necessary, for protection from SARS-CoV-2 appropriate to the exposure risk associated with the job. The employer must follow current CDC and OSHA guidance for personal protective equipment.

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 Huron School District will provide non-medical grade face coverings (cloth face coverings) to employees (cloth face coverings are technically not considered PPE). The Huron School District will require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace. The Huron School District 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 Staff	Cloth Facial Coverings
Teacher/Custodial Cleaning	Face Shield
Teacher/Custodian	Vinyl Gloves for Cleaning
Special Education Teachers	See through facial coverings

✔ Health Surveillance

The Huron School District will conduct a daily entry self-screening protocol for all employees or contractors entering the workplace, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19, together with, if possible, a temperature screening. The Building Principals 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 Huron School District will have employees self-screen for COVID-19. The Huron School District 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. The Huron School District 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 direct supervisor before and during the work shift. The Huron School District 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:

Employees should complete daily survey even if not at work to document possible symptoms. If an employee becomes ill while at workplace they are to immediately notify supervisor.

The Huron School District 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 Huron School District 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, the direct supervisor or building principal 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 Huron School District will not reveal the name or identity of the confirmed case.

The Huron School District 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

The Huron School District shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

The Huron School District 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.

The Central Office shall create a record of the training. Records should include the name of the employee(s) trained and the date of the training.

Recordkeeping

The Huron School District 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.

Laura DiMambro 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.

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