

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 Johannesburg-Lewiston 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. Superintendent Xenakis-Makowski has read these guidance documents carefully, found the safeguards appropriate to Johannesburg-Lewiston 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. Superintendent Xenakis-Makowski 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.

Johannesburg-Lewiston 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) are the building administrators and maintenance/custodial workers. A supervisor will remain on-site at all times when employees are present on site. Employees are not to be onsite after 8pm without prior arrangements. 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 or internal shared folder.

Exposure Determination

Johannesburg-Lewiston 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. Superintendent Xenakis-Makowski was responsible for the exposure determination.

Johannesburg-Lewiston 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.

The Superintendent verifies that Johannesburg-Lewiston 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.

Johannesburg-Lewiston 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.

Job/Task	Exposure Risk Determination (Lower or Medium)	Qualifying Factors (Ex. No Public Contact, Public Contact)
Administrator	Medium	Some public contact
Non-Union Employees	Medium	Some public contact
Teacher	Medium	Some public contact
Support Staff	Medium	Some public contact

Engineering Controls

Johannesburg-Lewiston 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.
- Increasing the amount of ventilation in the building.
- Increasing the amount of fresh outdoor air that is introduced into the building.

The Maintenance 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
Dividers on tables that require non-masking for eating and less than 6 feet distance	Plexiglass dividers

Windows and doors to the outside, when monitored, can be left open for greater fresh air flow	N/A
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Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. The Superintendent and Administration 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 Johannesburg-Lewiston 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.)

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	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 when possible.
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 the public to wear cloth face coverings.
All employees	Keep families informed about symptoms of COVID-19 and ask sick students to stay at home until healthy

	again.
All employees	Provide the public and staff with tissues, trash receptacles, and hand sanitizer.
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	Do not require a healthcare provider's note for employees who are sick with acute respiratory illness to validate their illness.
All employees	Maintain flexible policies that permit employees to stay home to care for a sick family member.

Hand Hygiene

The Maintenance 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, Johannesburg-Lewiston Area Schools shall provide employees with antiseptic hand sanitizers or towelettes. Johannesburg-Lewiston Area Schools will provide time for employees to wash hands frequently and to use hand sanitizer.

Disinfection of Environmental Surfaces

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

The Maintenance Supervisor 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, Johannesburg-Lewiston 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:

Surface	Method/Disinfectant Used	Schedule/Frequency
Door handles/bathrooms	Disinfectant spray	4x daily
Classroom and office chairs/desks	Disinfectant spray and wipe down	Any time classes change
Classroom and office chairs and desks	Electrostatic disinfectant sprayer	1x daily (night)
Halls/bathrooms	Electrostatic disinfectant sprayer	1x daily (night)
Buses	Electrostatic disinfectant sprayer	2x daily (after route completed)

Johannesburg-Lewiston 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. The Superintendent will be responsible for seeing that this protocol is followed.

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

Electrostatic Disinfectant sprayer will be used in all areas of the district, including school buses for enhanced cleaning and disinfection in addition to increased sanitizing and standard disinfectant spraying.

Personal Protective Equipment (PPE)

Johannesburg-Lewiston 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.

Johannesburg-Lewiston Area Schools will provide non-medical grade face coverings (cloth face coverings) to employees (cloth face coverings are technically not considered PPE). Johannesburg-Lewiston Area Schools will require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace. Johannesburg-Lewiston Area Schools will consider face shields when employees provide medical documentation seeking an accommodation.

The following type(s) of PPE have been selected for use:

Job/Task	PPE
Cleaning desks/tables	Mask, shield, gloves
Cleaning buses or using sprayers	Mask, shield, gloves

Health Surveillance

Johannesburg-Lewiston 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. The Superintendent 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, Johannesburg-Lewiston Area Schools will have employees self-screen for COVID-19. Johannesburg-Lewiston 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. Screening tools are available on paper or via QR code. Johannesburg-Lewiston 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 their supervisor before and during the work shift. Johannesburg-Lewiston 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:

Employees who believe they have symptoms are not to report to work, to call in sick and notify their immediate supervisor of suspected/confirmed illness.

Johannesburg-Lewiston 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.

Johannesburg-Lewiston 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, the Superintendent 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, Johannesburg-Lewiston Area Schools will not reveal the name or identity of the confirmed case.

Johannesburg-Lewiston 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

The Superintendent shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

Johannesburg-Lewiston 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.

The Administrative 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

Johannesburg-Lewiston 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.

The Administrative Office 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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