

Milan Area Schools

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 Milan Area Schools 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. Bryan Girbach, Superintendent of Schools, has read these emergency rules carefully, developed the safeguards appropriate to Milan Area Schools based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

Milan 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 Sean DeSarbo and Lisa Mellinger for Paddock Elementary School, Jennifer Bookout for Symons Elementary School, Shanna Spicakrd and Kim Jasper for Milan Middle School, and Aaron Shinn and Chris Gill for Milan High School. 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 website.

✔ Exposure Determination

Milan 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. Bryan Girbach was responsible for the exposure determination.

Milan 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.

Bryan Girbach, Superintendent of Schools, verifies that Milan 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.

Milan 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)
Custodial	Medium	During face to face instruction - Public Contact; During Virtual - Limited to no public contact

Maintenance	Medium	During face to face instruction - Public Contact; During Virtual - Limited to no public contact
Food Service	Medium	During face to face instruction - Public Contact; During Virtual - Limited to no public contact
Transportation	Medium	During face to face instruction - Public Contact; During Virtual - Limited to no public contact
Administration	Medium	During face to face instruction - Public Contact; During Virtual - Limited to no public contact
Nurse	Medium	During face to face instruction - Public Contact; During Virtual - Limited to no public contact
Teachers	Medium	During face to face instruction - Public Contact; During Virtual - Limited to no public contact
Paraprofessionals	Medium	During face to face instruction - Public Contact; During Virtual - Limited to no public contact
Support Staff (Comm. Ed, Preschool, Administrative Assistants)	Medium	During face to face instruction - Public Contact; During Virtual - Limited to no public contact

 **Engineering Controls**

Milan 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.

The Director of Buildings and Grounds 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
Install Barriers in Office Spaces	Clear Plastic Sneeze Guards are installed in each building's office space.
Increased building ventilation	Running intake before, during, and after building occupancy
Increased fresh outdoor air	Running intake before, during, and after building occupancy
Space Mitigation	Socially distances furniture and work places based on the 6 foot recommendations from CDC.
Remote Work	Where possible, staff are working remotely.
Scheduled disinfecting and cleaning	Increased response times and scheduled additional custodial services based on building and occupancy
Limited building access	Limited access to students and staff only
FFE Restrictions and controls implemented	Shut down communal furnishings, removed access to common gathering spaces.

✔ Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. The Administrative Team and school nurse 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 Milan Area Schools:

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 students 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 inside buildings. Mask breaks can only be taken when staff are by themselves or outside.
All employees	Require students and the public to wear cloth face coverings.
All employees	Keep students/families informed about symptoms of COVID-19 and ask sick customers to stay at home until healthy again. Encourage sick students to use drive-

	through services, curbside pickup, or home delivery.
All employees	Provide students and the public with tissues and trash receptacles.
All employees	Encourage students to place orders for services through the phone or web.
All employees	Promote curbside pick-up to minimize contact with customers.
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 Director of Buildings and Grounds and the Administrative Team 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, Milan Area Schools shall provide employees with antiseptic hand sanitizers or towelettes. Milan Area Schools will provide time for employees to wash hands frequently and to use hand sanitizer.

Milan Area Schools 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

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

The Director of Buildings and Grounds 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, Milan 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
Contact surfaces within classrooms and office spaces	Spray chemical disinfectant	At least daily but more frequent based on occupancy (classroom surfaces between student groups)
Common Areas	Spray chemical disinfectant	Multiple times per day
Covid Risk/Event	Electro-Static spray of disinfectant	By event/notification

Milan 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 Administrative Team will be responsible for seeing that this protocol is followed.

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

- Regular Disinfecting of Frequently Touched Services
- Regular Disinfecting of Student Furniture
- Daily Disinfecting of All Common Spaces

✔ Personal Protective Equipment (PPE)

Milan Area Schools 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.

Milan Area Schools will provide non-medical grade face coverings (cloth face coverings) to employees (cloth face coverings are technically not considered PPE). Milan Area Schools will require employees to wear face coverings at all times in the workplace. Mask breaks can only be taken when staff are by themselves or outside. Milan Area Schools will provide face shields when employees request them.

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

Job/Task	PPE
All Employees / Students	Face coverings
Disinfecting Process	Rubber Gloves, face shields, face coverings
Response to in building illness	Medical grade face covering (KN-95), disposable gloves, face masks and shields

Health Surveillance

Milan Area Schools 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 Administrative Team and School Nurse will be responsible for ensuring that all required health surveillance provisions are performed.

Milan 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 direct supervisor before and during the work shift. Milan 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: Contact direct supervisor by email, text, or phone

Milan Area Schools will physically isolate any employees or students 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.

Milan 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, Bryan Girbach will notify the local public health department immediately, and any co-workers, contractors, or suppliers who may have come into close contact with the person who is the confirmed case of COVID-19, within 24 hours. When notifying coworkers, contractors, and suppliers, Milan Area Schools will not reveal the name or identity of the confirmed case.

Milan 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

Milan Area Schools shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

Milan 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.

Milan Area Schools shall create a record of the training. Records should include the name of the employee(s) trained and the date of the training.

✔ Recordkeeping

Milan 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.

Bryan Girbach 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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