

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 Montcalm Community College 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 Executive Team has read these emergency rules carefully, developed the safeguards appropriate to Montcalm Community College based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

Montcalm Community College 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 Vice President for Administrative Services. 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 email and the MCC Coronavirus page.

✔ Exposure Determination

Montcalm Community College 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 Executive Team was responsible for the exposure determination.

Montcalm Community College 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 Vice President for Administrative Services verifies that Montcalm Community College 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.

Montcalm Community College has categorized its jobs as follows:

Job/Task	Exposure Risk Determination (Lower or Medium)	Qualifying Factors (Ex. No Public Contact, Public Contact)
WHEN STUDENTS NOT ON CAMPUS	**ALL JOBS ARE LOW-MEDIUM EXPOSURE RISK	
Position/Employee Group	Can employee/group feasibly complete all work remotely?	If not, the following aspects of the work performed by each employee/group that cannot feasibly be complete remotely (i.e., providing assistance to students).
		These aspects of work cannot feasibly be completed remotely and employee/group must be physically present in the workplace for the specified periods of time for the following reasons (i.e., requires face to face interaction with students).
Academic Affairs	Yes	
Activities	Mostly	Auxiliary Services Manager to come in to do some maintenance on machines and testing for the pool
Business Office	Mostly	Employees will alternate times on campus to pay bills, run reports and other operating system tasks.
CIS Lab	Yes	
Communications/Marketing	Mostly	All employees can work from home; however they may periodically need to go in if there is a special print job requiring office equipment, tasks with large files needing special software or faster internet speeds, or tasks involving materials or supplies only available at the office.
Facilities	No	
		All work for these employees is 'hands-on'. All employees are wearing masks and keeping their distance to complete their tasks.
Faculty (FT & PT)	Mostly	Outside of labs for nursing/health careers.
Financial Aid	Mostly	A couple days a week 1 person will come to campus to check mail and do scanning that cannot be done remotely
Human Resources	Mostly	Payroll Manager to come to campus 1-2 days every 2 weeks to run payroll/print checks through 2020. In January 2021, she will need to be there for some year end reporting tasks that cannot be done remotely.
IT	Mostly	These employees are working remotely unless they need to come to campus to get equipment or fix equipment for employees.
Lab Assistants/ Lab Monitors/Lab Supervisors	Yes	
Library	Yes	
Math/Writing Centers	Yes	
President's Office	Yes	
Student Services	Mostly	Some employees come in periodically through the week to run daily reports
Student Success Center	Yes	
Tutors/SILS	Yes	

Engineering Controls

Montcalm Community College 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 Vice President of Administrative Services & the Director of Facilities 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
Any job that requires person to person interaction	All EE's are required to do a health screening before coming to campus and are required wear face coverings. There are plexiglass guards in place on all front-facing workspaces and all have been appropriately spaced.

✔ Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. The Executive Team 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 Montcalm Community College:

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/students to utilize online services.
All employees	Provide customers and the public with tissues and trash receptacles.
All employees	Encourage customers to place orders for merchandise or services through the phone or web.
All employees	Promote virtual services or by appointment only to minimize contact.
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.
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✔ Hand Hygiene

MCC Director of Facilities 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, MCC shall provide employees with antiseptic hand sanitizers or towelettes. MCC will provide time for employees to wash hands frequently and to use hand sanitizer.

Montcalm Community College 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

Montcalm Community College 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). MCC will make cleaning supplies available to employees upon entry and at the worksite.

MCC Director of Facilities 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, MCC 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
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Door Handles/Exit Devices	Quat disinfectant/ammonium chloride wipes	Once every two hours from 7 AM to 9 PM
Vending Machines	Quat disinfectant/ammonium chloride wipes	Once every two hours from 7 AM to 9 PM
Bathroom Fixtures	Quat disinfectant/ammonium chloride wipes	Once every two hours from 7 AM to 9 PM
Public use countertops	Quat disinfectant/ammonium chloride wipes	Once every two hours from 7 AM to 9 PM

Montcalm Community College 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. MCC Director of Facilities will be responsible for seeing that this protocol is followed.

✔ Personal Protective Equipment (PPE)

Montcalm Community College 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.
- 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.

Montcalm Community College will provide non-medical grade face coverings (cloth face coverings) to employees (cloth face coverings are technically not considered PPE). MCC will require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace. MCC 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 employees	Cloth face coverings (face shields, gloves and wipes also available)

✔ Health Surveillance

Montcalm Community College 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. MCC Vice President of Administrative Services 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, Montcalm Community College will have employees self-screen for COVID-19. MCC 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. MCC 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 MCC's Executive Team and Director of Human Resources before and during the work shift. MCC 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:

Montcalm Community College 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.

Montcalm Community College 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, MCC's College President 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, Montcalm Community College will not reveal the name or identity of the confirmed case.

Montcalm Community College 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

MCC's Director of Human Resources shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

Montcalm Community College 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.

MCC's Director of Human Resources shall create a record of the training. Records should include the name of the employee(s) trained and the date of the training.

✔ Recordkeeping

Montcalm Community College 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.

MCC Director of Human Resources 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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