COVID-19 Workplace Preparedness Plan

General

The following COVID-19 preparedness & response plan has been established for Covenant House Academy in accordance with the requirements in the Executive Orders (EOs) for COVID-19 signed by Governor Gretchen Whitmer, 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 EOs, OSHA guidance, and CDC guidance for COVID-19 have general safeguards applicable for all workplaces and specific safeguards for certain industries. Tanya Duffy, Assistant Superintendent, has read these guidance documents carefully, found the safeguards appropriate to Covenant House Academy 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, the EOs and CDC guidance are periodically updated. Tanya Duffy, Assistant Superintendent, will be responsible for visiting the EO webpage and CDC guidance webpage regularly (for example, weekly) for the latest information and for revising the plan as necessary. The EOs are found at: https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705---,00.html. The CDC guidance documents are found at: https://www.cdc.gov/coronavirus/2019-ncov/communication/guidance-list.html?Sort=Date%3A%3Adesc. This plan reflects the EOs and CDC guidance as of July 30, 2020.

Covenant House Academy has designated one or more worksite supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The worksite supervisor(s) is Terrence George (Southwest Campus), Stephen Stewart (Central Campus), Nate King (East Campus), and Tanya Duffy (District Administration Building). 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 website and emailed to employees.

Exposure Determination

Covenant House Academy 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. Terrence George was responsible for the exposure determination.
Covenant House Academy 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.

Terrence George, Superintendent, verifies that Covenant House Academy 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.

Covenant House Academy 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.)

<table>
<thead>
<tr>
<th>Job/Task</th>
<th>Exposure Risk Determination (Lower or Medium)</th>
<th>Qualifying Factors (For Example, No Public Contact, Public Contact)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Classroom Teachers</td>
<td>Medium</td>
<td>Daily contact with students</td>
</tr>
<tr>
<td>Building Administrators</td>
<td>Medium</td>
<td>Daily Contact with students</td>
</tr>
<tr>
<td>Instructional Support</td>
<td>Medium</td>
<td>Daily Contact with Students</td>
</tr>
<tr>
<td>District Administration</td>
<td>Lower</td>
<td>Intermittent contact with students</td>
</tr>
</tbody>
</table>
Covenant House Academy 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.

Terrence George, Superintendent, 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:

<table>
<thead>
<tr>
<th>Job/Task</th>
<th>Engineering Control</th>
</tr>
</thead>
<tbody>
<tr>
<td>Receptionists/Secretaries/Security/Counselor/Social workers</td>
<td>Sneeze guards</td>
</tr>
<tr>
<td>Classroom teachers</td>
<td>Sneeze guards</td>
</tr>
<tr>
<td>Classroom teachers</td>
<td>Window fans</td>
</tr>
<tr>
<td>Classroom Teachers</td>
<td>Air Filters</td>
</tr>
<tr>
<td>Classrooms</td>
<td>Student desks spaced apart and not facing each other</td>
</tr>
</tbody>
</table>
### Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. Terrence George, 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 Covenant House Academy:

(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.)

<table>
<thead>
<tr>
<th>Job/Task</th>
<th>Administrative Control</th>
</tr>
</thead>
<tbody>
<tr>
<td>All employees</td>
<td>Maintain at least six feet from everyone on the worksite.</td>
</tr>
<tr>
<td></td>
<td>Use ground markings, signs, and physical barriers to prompt employees to remain six feet from others.</td>
</tr>
<tr>
<td></td>
<td>Promote remote work (telecommuting) to the fullest extent possible.</td>
</tr>
<tr>
<td></td>
<td>Establish alternating days or extra shifts to reduce the total number of employees in the facility at a given time.</td>
</tr>
<tr>
<td></td>
<td>Restrict business-related travel for employees to essential travel only.</td>
</tr>
<tr>
<td></td>
<td>Restrict face-to-face meetings. Communicate with others through phone, email, teleconferencing, and web conferencing.</td>
</tr>
<tr>
<td></td>
<td>Restrict the number of customers in the establishment at any given time.</td>
</tr>
<tr>
<td></td>
<td>Minimize the sharing of tools, equipment, and items.</td>
</tr>
</tbody>
</table>

Commented [A1]: Delete?
Commented [A2]: Delete?
Commented [A3]: Limit
Commented [A4]: Limit
Commented [A5]:
<table>
<thead>
<tr>
<th><strong>Provide employees with non-medical grade face coverings (cloth face coverings).</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Require employees to wear cloth face coverings at all times, except when in offices by themselves, when eating or drinking, or if they cannot medically tolerate a mask. If the employee is not unable to wear a mask, they will wear a face shield.</strong></td>
</tr>
<tr>
<td><strong>Require customers and the public to wear cloth face coverings.</strong></td>
</tr>
<tr>
<td><strong>Keep customers informed about symptoms of COVID-19 and ask sick customers to stay at home until healthy again.</strong></td>
</tr>
<tr>
<td><strong>Provide customers and the public with tissues and trash receptacles.</strong></td>
</tr>
<tr>
<td><strong>Encourage proper cough and sneeze etiquette by employees, including covering coughs and sneezes and coughing and sneezing in one’s elbows rather than hands.</strong></td>
</tr>
<tr>
<td><strong>Ensure that sick leave policies are flexible and consistent with public health guidance, so employees do not go to work sick.</strong></td>
</tr>
<tr>
<td><strong>Do not require a healthcare provider’s note for employees who are sick with acute respiratory illness to validate their illness.</strong></td>
</tr>
<tr>
<td><strong>Maintain flexible policies that permit employees to stay home to care for a sick family member.</strong></td>
</tr>
</tbody>
</table>

**Hand Hygiene**

_Terrence George, Superintendent_ 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, **Covenant House Academy** shall provide employees with antiseptic hand sanitizers or towelettes. **Covenant House Academy** will provide time for employees to wash hands frequently and to use hand sanitizer.
Disinfection of Environmental Surfaces

Covenant House Academy 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). Covenant House Academy will make cleaning supplies available to employees upon entry and at the worksite.

Building Maintenance Staff 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, Covenant House Academy 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:

<table>
<thead>
<tr>
<th>Surface</th>
<th>Method/Disinfectant Used</th>
<th>Schedule/Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Door handles/Countertops/light switches</td>
<td>Sprayed or wiped/ Bleach-water solution and Diffense</td>
<td>4 times per day</td>
</tr>
<tr>
<td>Bathrooms</td>
<td>Super HDQ L10; TB Cide Quat; Diffense</td>
<td>4 times per day</td>
</tr>
<tr>
<td>Technology</td>
<td>Wiped off daily and UV light wand</td>
<td>Each will occur 1 times per day</td>
</tr>
<tr>
<td>Sneeze Guards</td>
<td>Sprayed or wiped/ Bleach-water solution and Diffense</td>
<td>4 times per day</td>
</tr>
<tr>
<td>Entire building</td>
<td>Disinfectant Fogger</td>
<td>1 time per week</td>
</tr>
</tbody>
</table>

Covenant House Academy 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. [Name and job title] will be responsible for seeing that this protocol is followed.

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

- Vacuum the space if needed. Use vacuum equipped with high-efficiency particulate air (HEPA) filter, if available.
- Do not vacuum a room or space that has people in it. Wait until the room or space is empty to vacuum, such as at night, for common spaces, or during the day for private rooms.
- Consider temporarily turning off room fans and the central HVAC system that services the room or space, so that particles that escape from vacuuming will not circulate throughout the facility.

**Personal Protective Equipment (PPE)**

[Covenant House Academy] 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.

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

<table>
<thead>
<tr>
<th>Job/Task</th>
<th>PPE</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Staff</td>
<td>Disposable Mask; face shield; gloves</td>
</tr>
</tbody>
</table>
Health Surveillance

____ Covenant House Academy____ 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. (Name and job title of person) 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, ____ Covenant House Academy____ will have employees self-screen for COVID-19. ____ Covenant House Academy____ 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. ____ Covenant House Academy____ 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 ____ Building Supervisor____ before and during the work shift. ____ Covenant House Academy____ 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:

■ Staff members will report symptoms prior to entering the building through the completion of the MIsymptoms app questionnaire.

■ If symptoms are present, the employee does not report to work.

■ If the employee becomes symptomatic at work, he or she will immediately report their symptoms to the building principal.

____ Covenant House Academy____ 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.

____ Covenant House Academy____ 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, within 24 hours, Building Supervisor will notify both the local public health department, and any co-workers, contractors, or suppliers who may have come into contact with the person who is the confirmed case of COVID-19. When notifying coworkers, contractors, and suppliers, Covenant House Academy will not reveal the name or identity of the confirmed case. Covenant House Academy 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

Building Supervisors in conjunction with District Administration shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements. Covenant House Academy will train workers on, at a minimum:

1. Routes by which the virus causing COVID-19 is transmitted from person to person.
2. Distance that the virus can travel in the air, as well as the time it remains viable in the air and on environmental surfaces.
4. Workplace infection-control practices.
5. The proper use of PPE, including the steps for putting it on and taking it off.
6. Steps the worker must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
7. How to report unsafe working conditions.

Kathy Zadroga, Human Resource Coordinator, shall create a record of the training. The record will list the names of the employees trained, the training date, name of trainer, and content of training.

Recordkeeping

Covenant House Academy will maintain the following records as they relate to the COVID-19 preparedness and response plan:

1. Training records.
2. A record of daily entry self-screening results for all employees or contractors entering the workplace, including a questionnaire covering signs and symptoms of COVID-19 and exposure to people with suspected or confirmed COVID-19.
3. When an employee is identified with a confirmed case of COVID-19, a record that within 24 hours 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.

_Terrence George, Superintendent will ensure that the records are kept._
How to Safely Wear and Take Off a Cloth Face Covering

WEAR YOUR FACE COVERING CORRECTLY
- Wash your hands before putting on your face covering
- Put it over your nose and mouth and secure it under your chin
- Try to fit it snugly against the sides of your face
- Make sure you can breathe easily
- Do not place a mask on a child younger than 2

USE THE FACE COVERING TO HELP PROTECT OTHERS
- Wear cloth face coverings in public settings and when around people who don’t live in your household, especially when other social distancing measures are difficult to maintain
- Don’t put the covering around your neck or up on your forehead
- Don’t touch the face covering, and, if you do, clean your hands

FOLLOW EVERYDAY HEALTH HABITS
- Stay at least 6 feet away from others
- Avoid contact with people who are sick
- Wash your hands often, with soap and water, for at least 20 seconds each time
- Use hand sanitizer if soap and water are not available

TAKE OFF YOUR CLOTH FACE COVERING CAREFULLY, WHEN YOU’RE HOME
- Unite the strings behind your head or stretch the ear loops
- Handle only by the ear loops or ties
- Fold outside corners together
- Place covering in the washing machine
- Wash your hands with soap and water

Cloth face coverings are not surgical masks or N 95 respirators, both of which should be saved for health care workers and other medical first responders.

For instructions on making a cloth face covering, see: cdc.gov/coronavirus
How to Protect Yourself and Others

Know how it spreads

- There is currently no vaccine to prevent coronavirus disease 2019 (COVID-19).
- The best way to prevent illness is to avoid being exposed to this virus.
- The virus is thought to spread mainly from person-to-person.
  - Between people who are in close contact with one another (within about 6 feet).
  - Through respiratory droplets produced when an infected person coughs, sneezes or talks.
  - These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs.
- Some recent studies have suggested that COVID-19 may be spread by people who are not showing symptoms.

Everyone should

Clean your hands often

- Wash your hands often with soap and water for at least 20 seconds especially after you have been in a public place, or after blowing your nose, coughing, or sneezing.
- If soap and water are not readily available, use a hand sanitizer that contains at least 60% alcohol. Cover all surfaces of your hands and rub them together until they feel dry.
- Avoid touching your eyes, nose, and mouth with unwashed hands.

Avoid close contact

- Limit contact with others as much as possible.
- Avoid close contact with people who are sick.
- Put distance between yourself and other people.
  - Remember that some people without symptoms may be able to spread virus.
  - This is especially important for people who are at higher risk of getting very sick. [www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-at-higher-risk.html](http://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-at-higher-risk.html)
Covenant House Academy

COVID-19 Preparedness and Response Plan

Cover your mouth and nose with a cloth face cover when around others

- You could spread COVID-19 to others even if you do not feel sick.
- Everyone should wear a cloth face covering in public settings and when around people not living in their household, especially when social distancing is difficult to maintain.
  - Cloth face coverings should not be placed on young children under age 2, anyone who has trouble breathing, or is unconscious, incapacitated or otherwise unable to remove the mask without assistance.
- The cloth face cover is meant to protect other people in case you are infected.
- Do NOT use a facemask meant for a healthcare worker.
- Continue to keep about 6 feet between yourself and others. The cloth face cover is not a substitute for social distancing.

Cover coughs and sneezes

- Always cover your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow.
- Throw used tissues in the trash.
- Immediately wash your hands with soap and water for at least 20 seconds. If soap and water are not readily available, clean your hands with a hand sanitizer that contains at least 60% alcohol.

Clean and disinfect

- If surfaces are dirty, clean them: Use detergent or soap and water prior to disinfection.
- Then, use a household disinfectant. You can see a list of [EPA-registered household disinfectants here](http://www.epa.gov/cleaningproducts).

[cdc.gov/coronavirus](http://www.cdc.gov/coronavirus)