



## COVID-19 Preparedness & Response Plan For Lower and Medium Exposure Risk Employers

### General

The following COVID-19 preparedness & response plan has been established for the City of Mount Clemens 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. Administration has read these guidance documents carefully, found the safeguards appropriate to the City of Mount Clemens 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. The City Manager 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](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 September 24, 2020.

The City of Mount Clemens 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 respective Department Heads, Administrative Staff or other supervisory employees. 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 the City of Mount Clemens' website, internal shared network under Human Resources Policies, and/or hard copy available in the Human Resources Department or onsite at each facility in the supervisor's office.

### Exposure Determination

The City of Mount Clemens 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. In conjunction with City Administration, Sara Price, Human Resources Director was responsible for the exposure determination.

The City of Mount Clemens 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.

Sara Price, Human Resources Director verifies that the facilities at City Hall, the Department of Public Services, Dial-A-Ride, the Wastewater Treatment Plant and the Water Filtration Plant have 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. A separate policy will be in place for staff at the Fire Department.

The City of Mount Clemens 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.)

<b>Job/Task</b>	<b>Exposure Risk Determination (Lower or Medium)</b>	<b>Qualifying Factors (For Example, No Public Contact, Public Contact)</b>
Non Union Administration	Lower or Medium	Public Contact
Clerical Office	Lower or Medium	Public Contact
Blight Enforcement	Lower	Public Contact
Maintenance Workers	Lower	Limited Public Contact
Operators/Crew Leaders/Laboratory Technicians	Lower	Limited Public Contact
Traffic Control Technician	Lower	Limited Public Contact
Mechanics	Lower	Limited Public Contact
Parking Enforcement	Lower or Medium	Public Contact
Bus Drivers/Dispatchers	Lower or Medium	Public Contact

## Engineering Controls

The City of Mount Clemens 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.

Donald Johnson, City Manager 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:

<b>Job/Task</b>	<b>Engineering Control</b>
Clerical Office	Physical barriers (sneeze guards) have been installed at all front counter locations which interact with the public.
All City facilities	Ventilation systems have been upgraded

All City facilities	Hand sanitizer stations have been installed at all City facilities.
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## Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. City 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 the City of Mount Clemens:

<b>Job/Task</b>	<b>Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)</b>
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 non-bargaining/clerical	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 and independent contractors	Minimize the sharing of tools, equipment, and items.
All employees and independent contractors	Provide employees with non-medical grade face coverings (cloth face coverings).
All employees and independent contractors	Require employees to wear cloth face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.
All City facilities open to the public	Require customers and the public to wear cloth face coverings.
All City facilities open to the public	Keep customers informed about symptoms of COVID-19 and ask sick customers to stay at home until healthy again. Encourage sick customers to handle transactions over the phone or through the City's website
All City facilities open to the public	Provide customers and the public with tissues and trash receptacles.
All employees and independent contractors	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

City Administration 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 City of Mount Clemens shall provide employees with antiseptic hand sanitizers or towelettes. The City of Mount Clemens will provide time for employees to wash hands frequently and to use hand sanitizer.

## Disinfection of Environmental Surfaces

The City of Mount Clemens 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 City of Mount Clemens will make cleaning supplies available to employees upon entry and at the worksite.

City Administration 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 City of Mount Clemens 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
Counters	EPA approved disinfectants	Daily or as needed
Shared copiers, printers, scanners	EPA approved disinfectants	Daily or as needed
Bus Interiors	EPA approved disinfectants and clothing steamer	Daily or as needed
Bathroom facilities	EPA approved disinfectants	Daily or as needed
Exterior doors	EPA approved disinfectants	Daily or as needed
Stair rails	EPA approved disinfectants	Daily or as needed
Door knobs	EPA approved disinfectants	Daily or as needed
Shared tools and surfaces at DPS	EPA approved disinfectants	Daily or after each use

The City of Mount Clemens 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. City Administration will be responsible for seeing that this protocol is followed.

## Personal Protective Equipment (PPE)

The City of Mount Clemens 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.

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

<b>Job/Task</b>	<b>PPE</b>
All employees and independent contractors	Provide non-medical grade face coverings (cloth face coverings).
All employees and independent contractors	Provide non-medical grade gloves when handling documents/payments from the public.

## **Health Surveillance**

The City of Mount Clemens 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 supervisors and the Human Resources Department 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 City of Mount Clemens will have employees self-screen for COVID-19. The City of Mount Clemens 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 City of Mount Clemens will similarly screen independent contractors entering the worksite.

Employees have been directed to promptly report any signs and symptoms of COVID-19 to their supervisor and/or the Human Resources Department before and during the work shift. The City of Mount Clemens 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:

### **Employee Suspected or Confirmed as a COVID-19 Case**

A screening questionnaire must be completed by each staff member prior to starting their shift. Answering yes to any question on the screening questionnaire will prompt additional questions being asked by supervisors or the human resources department. The employee may be sent home for follow up care from a physician or to self-monitor their symptoms.

An employee will be considered to have a Suspected Case of COVID-19 if:

1. The employee is experiencing any of the following COVID-19 symptoms: fever, shortness of breath, and/or continuous cough; or
2. The employee is experiencing at least two of the following COVID-19 symptoms: chills, repeated shaking with chills, muscle pain, headache, sore throat, and/or loss of taste or smell.
3. An immediate family member or a person who the employee is residing with has tested positive for or exhibited symptoms of COVID-19; or,
4. In the last fourteen (14) days, the employee has been exposed to a person who has tested positive for COVID-19.

An employee suspected as a COVID-19 Case is required to:

1. Immediately notify the employee's direct supervisor and/or human resources.
2. Self-quarantine for fourteen (14) days.
3. Seek immediate medical evaluation and care.

If an employee qualifies as a suspected COVID-19 case, the city will:

1. Notify all employees who may have come into close contact (defined as being within six feet for a prolonged period of time without personal protection equipment) with the employee in the past fourteen (14) days; and,
2. Ensure that the employee's work area is thoroughly disinfected.

An employee will be considered to have a Confirmed Case of COVID-19 if the employee has been working on-site in the past fourteen (14) days and tested positive for COVID-19.

An employee suspected as a COVID-19 Case is required to:

1. Immediately notify the employee's direct supervisor and/or Human Resources; and,
2. Remain off work until cleared to return in accordance with the requirements of this plan.
3. If an employee qualifies as a suspected COVID-19 case, the city will:
4. Notify all employees who may have come into close contact (defined as being within six feet for a prolonged period of time without personal protection equipment) with the employee in the past fourteen (14) days;
5. Ensure that the employee's work area is thoroughly disinfected.
6. If necessary, close the work area until all necessary disinfecting is completed; and,
7. Communicate with employees about the presence of a confirmed COVID-19 case and the disinfecting plan, including when the work area will be available

Employee Return to Work – An employee who has a suspected COVID-19 case is prohibited from returning to work until:

1. Fourteen (14) days have lapsed since the employee was quarantined; or,
2. The employee has had no fever for at least 72 hours (i.e. 3 full days of no fever without the use of medicine that reduces fevers), other symptoms have improved, and at least 7 days have passed since symptoms first appeared; or,
3. The employee receives a negative COVID-19 test.

The city reserves the right to require a COVID-19 test as a condition of return to work.

In the case of a confirmed case of COVID-19, the employee will be permitted to return to work if

1. The employee no longer has a fever (without the use of medicine that reduces fevers)
2. Other symptoms have improved, and
3. the employee tests negative on two COVID-19 tests administered 24 hours apart following CDC guidelines.

Return to work rules for firefighters will be administered in accordance with Center for Disease Control (CDC) guidelines for first responders, as amended.

The City of Mount Clemens 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 City of Mount Clemens 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, the City Manager or Human Resources Director 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, the City of Mount Clemens will not reveal the name or identity of the confirmed case.

Employees seeking leave under the Families First Coronavirus Response Act are encouraged to contact Human Resources.

## **Training**

The Human Resources Department shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

The City of Mount Clemens 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.
3. Symptoms of COVID-19.
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.

The Human Resources Department 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**

The City of Mount Clemens 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.

The Human Resources Department will ensure that the records are kept.



**COVID-19 Health Screening Questionnaire**

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Dept.: \_\_\_\_\_

TEMPERATURE: \_\_\_\_\_

All City employees are **REQUIRED** to complete the COVID-19 screening form at the start of their shift.

1. Do you have new or unexplained symptoms of fever (100.4 or above), cough (without known cause), shortness of breath, muscle aches, sore throat, nausea/diarrhea, chills, shaking, congestion, eye irritation or loss of taste/smell?

Yes  No

If so, please list: \_\_\_\_\_

2. Have you been directed or told by the local health department or your healthcare provider to self-isolate or self-quarantine?

Yes  No

3. Have you been in close contact\* with anyone who has tested positive or has a probable case of COVID-19 in the past 14 days?

Yes  No

I attest that all answers to the questions in this questionnaire are accurate to the best of my knowledge.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**If the answer is “yes” to any of the questions, do not report to work and notify your supervisor immediately.**

\* Close contact is defined as being within six (6) feet of a COVID-19 infected person for ten (10) minutes or longer, or having direct contact for any length of time with the infectious secretions (e.g., being coughed or sneezed on) of a COVID-19 infected person.