



COVID-19 Preparedness & Response Plan

Berrien Regional Education Service Agency

For Lower and Medium Exposure Risk Employers ONLY

General

The following COVID-19 preparedness & response plan has been established for Berrien Regional Education Service Agency (RESA) 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 staff 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. **Troy Boone, Supervisor of Facilities and Operations**, has read these guidance documents carefully, found the safeguards appropriate to Berrien RESA 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. **Troy Boone, Supervisor of Facilities and Operations**, will be responsible for reviewing the latest information and revising the plan as necessary. This plan reflects the EOs and CDC guidance as of 10/12/2020.

Berrien RESA has designated its supervisors/superintendent's designee to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The supervisors/superintendent's designee will remain on-site at all times when staff are present on site.

The plan will be made readily available to staff and labor unions. The plan will be made available via the district's website.

Exposure Determination

Berrien RESA has evaluated routine and reasonably anticipated tasks and procedures for all staff to determine whether there is actual or reasonably anticipated staff exposure to SARS-CoV-2. Lynda Hurlow, Executive Director of Human Resources is responsible for the exposure determination.

Berrien RESA has determined that its staffs' 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 staff), small construction operations (less than 10 staff), and low-volume retail establishments, provided staff 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.

Lynda Hurlow, Executive Director of Human Resources, verifies that Berrien RESA 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.

Berrien RESA 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)
Teachers	Medium	Public Contact
Paraprofessionals	Medium	Public Contact
School Psychologists	Medium	Public Contact
Teacher Consultants	Medium	Public Contact
Social Workers	Medium	Public Contact
Occupational Therapists	Medium	Public Contact
Physical Therapists	Medium	Public Contact
Speech Pathologists	Medium	Public Contact
Early ON Specialists	Medium	Public Contact
All Secretaries/Printer	Medium	Public Contact
General Education Consultants	Medium	Public Contact
Administrators	Medium	Public Contact
Facility & Operations Personnel	Medium	Public Contact
Administrative Services Personnel	Medium	Public Contact
Technology Personnel	Medium	Public Contact

Engineering Controls

Berrien RESA has implemented feasible engineering controls to minimize or eliminate staff exposure to SARS-CoV-2. Engineering controls involve isolating staff 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.

Troy Boone, Supervisor of Facilities and Operations will be responsible for seeing that the correct engineering controls are chosen, installed, maintained for effectiveness, and serviced when necessary.

Engineering controls are outlined in the Berrien RESA SMART Re-Start Plan and the Welcome Back documents found on the [Berrien RESA website](#).

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate staff exposure to the hazard. (name or job title) 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 Berrien RESA:

Job/Task	Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)
All staff	Maintain at least six feet from everyone on the worksite.
All staff	Use ground markings, signs, and physical barriers to prompt staff to remain six feet from others.
All staff	Restrict business-related travel for staff to essential travel only.
All staff	Restrict face-to-face meetings. Communicate with others through phone, email, teleconferencing, and web conferencing.
Public	Restrict the number of customers in the establishment at any given time.
All staff	Minimize the sharing of tools, equipment, and items.
All staff	Provide staff with non-medical grade face coverings (cloth face coverings).
All staff	Require staff to wear cloth face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.
All individuals who enter buildings	Require customers and the public to wear cloth face coverings.

All staff, students, parents	Keep customers informed about symptoms of COVID-19 and ask sick customers to stay at home until healthy again.
All staff	Encourage proper cough and sneeze etiquette by staff, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands.
All staff	Ensure that sick leave policies are flexible and consistent with public health guidance, so staff do not go to work sick.
All staff	Maintain flexible policies that permit staff to stay home to care for a sick family member.

 **Hand Hygiene**

Troy Boone, Supervisor of Facilities and Operations, 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 staffs' hands are potentially exposed to SARS-CoV-2. When handwashing facilities are not available, Berrien RESA shall provide staff with antiseptic hand sanitizers or towelettes. Berrien RESA will provide time for staff to wash hands frequently and to use hand sanitizer.

 **Disinfection of Environmental Surfaces**

Berrien RESA 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). Berrien RESA will make cleaning supplies available to staff upon entry and at the worksite.

Troy Boone, Supervisor of Facilities and Operations will be responsible for seeing that environmental surfaces in the workplace are not infected. 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, Berrien RESA 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.

Methods used to disinfect and the frequency of such disinfection is outlined in the [Berrien RESA SMART Re-Start Plan](#).

Berrien RESA will perform enhanced cleaning and disinfection after persons confirmed to have COVID-19 have been in a work area. Troy Boone, Supervisor of Facilities and Operations, will be responsible for seeing that this protocol is followed.

Personal Protective Equipment (PPE)

Berrien RESA will provide staff 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.
- Consistently and properly worn.
- Properly removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, others, or the environment.

Berrien RESA will provide non-medical grade face coverings (cloth face coverings) to staff (cloth face coverings are technically not considered PPE). Berrien RESA will require staff to wear appropriate personal protection equipment as outlined in the [Berrien RESA SMART Re-Start plan](#).

Health Surveillance

Berrien RESA has implemented a screening protocol to identify known or suspected cases of COVID-19 among staff and isolate them from the remainder of the workforce. Lynda Hurlow, Executive Director of Human Resources, 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 day, Berrien RESA will have staff self-screen for COVID-19. Berrien RESA will have staff complete a

questionnaire covering the signs and symptoms of COVID-19 and their exposure to people with suspected or confirmed COVID-19. Berrien RESA will similarly screen contractors, suppliers, and any other individuals entering the worksite.

Staff have been directed to promptly report any signs and symptoms of COVID-19 to Lynda Hurlow, Executive Director of Human Resources, before and during the work day. Berrien RESA has provided staff with instructions for how to make such a report to the employer.

The specific instructions for staff reporting signs and symptoms of COVID-19 are as follows:

(LIST REPORTING INSTRUCTIONS PROVIDED TO STAFF)

Berrien RESA will physically isolate any staff 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.

Berrien RESA will not discharge, discipline, or otherwise retaliate against staff who stay at home or who leave work when they are at particular risk of infecting others with COVID-19.

When a staff member is identified with a confirmed case of COVID-19, Lynda Hurlow, Executive Director of Human Resources 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, Berrien RESA will not reveal the name or identity of the confirmed case.

Berrien RESA will allow staff 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

Lynda Hurlow, Executive Director of Human Resources shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

Berrien RESA will train workers on, at a minimum:

- Workplace infection-control practices.
- The proper use of personal protective equipment.
- Steps the staff 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.

Human Resources will have a record of the training.

Recordkeeping

Berrien RESA will maintain records of the following requirements:

- Training. The employer shall maintain a record of all COVID-19 staff training.
- Screening protocols. The employer shall maintain a record of screening for each staff or visitor entering the workplace.
- When a staff 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.

Lynda Hurlow, Executive Director of Human Resources, will ensure that the records are kept.

Additional COVID-19 protocols and expectations can be found in [Berrien RESA's Welcome Back guide](#) that was provided to staff at the start of the 2020-21 school year.

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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