

XXCOVID-19 Preparedness & Response Plan

For Lower and Medium Exposure Risk Employers ONLY

General

The following COVID-19 preparedness & response plan has been established for Saint Joseph County Transportation Authority (SJCTA) 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. Allen Balog has read these emergency rules carefully, developed the safeguards appropriate to SJCTA based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

SJCTA 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) are Allen Balog, Gail Huff, and Chris Yorks. 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 via website and or hardcopy.

Exposure Determination

SJCTA 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. Allen Balog is responsible for the exposure determination.

SJCTA 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.

Allen Balog verifies that SJCTA 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.

SJCTA 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)
Medical transport	Medium	
General transportation	Medium	
Escort	Medium/low	
Dispatch	Low	No public contact
Management	Low	No public contact

Engineering Controls

SJCTA 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.

Allen Balog 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
Dispatch	work remotely
Drivers	mask, clear curtain barrier. Take temp before start of shift. Using PPE
Management	Use PPE. Temp taken before shift and using PPE.
	https://www.cdc.gov

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. Director 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 SJCTA:
Follow all CDC guidelines for the safety of employees and riders. Temp and questioner completed at beginning of shift. Taking Temp. of riders prior to being allowed on the bus. Reporting to management any possible COVID exposure.

Job/Task	Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)
All employees	Maintain at least six feet from everyone on the worksite.
X	Use ground markings, signs, and physical barriers to prompt employees to remain six feet from others.
X	Promote remote work (telecommuting) to the fullest extent possible.
X	Promote flexible work hours (staggered shifts) to minimize the number of employees in the facility at one time.
X	Establish alternating days or extra shifts to reduce the total number of employees in the facility at a given time.
X	Restrict business-related travel for employees to essential travel only.
X	Restrict face-to-face meetings. Communicate with others through phone, email, teleconferencing, and web conferencing.
X closed to public	Restrict the number of customers in the establishment at any given time.
X	Minimize the sharing of tools, equipment, and items.
X	Provide employees with non-medical grade face coverings (cloth face coverings).
X	Require employees to wear cloth face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.
X	Require customers and the public to wear cloth face coverings.
X	Keep customers informed about symptoms of COVID-19 and ask sick customers to stay at home until healthy again.
N/A	Provide customers and the public with tissues and trash receptacles.
N/A	Encourage customers to place orders for merchandise or services through the phone or web.
N/A	Promote curbside and home delivery to minimize contact with customers.

X	Encourage proper cough and sneeze etiquette by employees, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands.
X	Ensure that sick leave policies are flexible and consistent with public health guidance, so employees do not go to work sick.
N/A	Do not require a healthcare provider's note for employees who are sick with acute respiratory illness to validate their illness.
X	Maintain flexible policies that permit employees to stay home to care for a sick family member.

Hand Hygiene

Management 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, SJCTA shall provide employees with antiseptic hand sanitizers or towelettes. SCTA will provide time for employees to wash hands frequently and to use hand sanitizer.

SJCTA 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. Installed blow dryers in restrooms and hand sanitizer..

Disinfection of Environmental Surfaces

SJCTA 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). SJCTA will make cleaning supplies available to employees upon entry and at the worksite.

Management 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, SJCTA 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
	clean and disinfect	Daily
All surfaces that employees come in contact with.		

SJCTA 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. Management will be responsible for seeing that this protocol is followed.

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

Personal Protective Equipment (PPE)

SJCTA 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: PPE will be provided to all employees.

- 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.

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

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

Job/Task	PPE
All	Mask and follow CDC and state guidelines
	https://www.cdc.gov

Health Surveillance

SJCTA. 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. Management 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, SJCTA will have employees self-screen for COVID-19. SJCTA 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. SJCTA 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 Management before and during the work shift. SJCTA 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:

SJCTA 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.

SJCTA 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, HR manager 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, SJCTA will not reveal the name or identity of the confirmed case.

SJCTA 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

Safety officer shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

SJCTA 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.

Safety officer shall create a record of the training. Records should include the name of the employee(s) trained and the date of the training.

Recordkeeping

SJCTA 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.

HR 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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