

# 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 the Diocese of Lansing 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. Lisa Kutas has read these emergency rules carefully, developed the safeguards appropriate to the Diocese of Lansing based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

Each location within the diocese 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/are \_\_\_\_\_. The supervisor will remain on-site during business hours when employees are present on site. Another on-site employee may be designated to perform the supervisory role as needed.

The plan will be made readily available to our employees and their representatives. The plan will be made available via Human Resources website and via email.

### Exposure Determination

The Diocese of Lansing 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. Lisa Kutas was responsible for the exposure determination.

The Diocese of Lansing has determined that its employees' jobs fall into only the lower exposure risk category 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.

Lisa Kutas verifies that the Diocese of Lansing 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.

## **Engineering Controls**

The Diocese of Lansing 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.

A local facilities manager will be responsible for seeing that the correct engineering controls are chosen, installed, maintained for effectiveness, and serviced when necessary.

### Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. A local representative 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 Diocese of Lansing:

<b>Job/Task</b>	<b>Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)</b>
All non-vaccinated employees	Maintain at least six feet from everyone on the worksite.
All employees	Restrict business-related travel for employees to essential travel only.
All employees	Minimize the sharing of tools, equipment, and items.
All non-vaccinated employees when six feet of distance cannot be maintained	Provide employees/visitors with non-medical grade face coverings (cloth face coverings).
All employees	Provide employees and the public with tissues and trash receptacles.
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.
HR Director	Ensure that diocesan sick leave policies are flexible and consistent with public health guidance, so employees do not go to work sick.
HR Director	Maintain flexible diocesan policies that permit

	employees to stay home to care for sick family member.
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**✔ Hand Hygiene**

A local designated contact 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 Diocese of Lansing shall provide employees with antiseptic hand sanitizers or towelettes. The Diocese of Lansing will provide time for employees to wash hands frequently and to use hand sanitizer.

The Diocese of Lansing 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**

The Diocese of Lansing will increase facility cleaning and application of disinfectant to limit exposure to COVID-19, especially on high-touch surfaces (for example, doorknobs, push bars, handrails, light switches.). The Diocese of Lansing will make cleaning supplies available to employees upon entry and at the worksite.

A local representative at each location 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 Diocese of Lansing 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:

<b>Surface</b>	<b>Method/Disinfectant Used</b>
Door knobs	Bioesque

Handrails	Bioesque
Light switches	Bioesque
Common area tables	Bioesque
Break area sinks/counters	Bioesque
Bathrooms	Bioesque

The Diocese of Lansing 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. A local designated representative will be responsible for seeing that this protocol is followed.

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

- If it has been less than 7 days since the sick employee used the facilities, clean and apply disinfectant to all areas used by the sick employee following the **CDC recommendations and the Guidance for the Cleaning and Application of Disinfectant in a Pandemic Situation**.
- If it has been 7 days or more since the sick employee used the facility, additional cleaning and application of disinfectant is not necessary. Continue routine cleaning and application of disinfectant to all high touch surfaces in the facility.

### **Personal Protective Equipment (PPE)**

The Diocese of Lansing will provide employees with the types of personal protective equipment, such as masks and gloves, 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.
- Properly fitted and periodically refitted as applicable.
- Consistently and properly worn.
- Regularly inspected, maintained, and replaced, as necessary.

The Diocese of Lansing will provide non-medical grade face coverings (cloth face coverings) to employees (cloth face coverings are technically not considered PPE). The

Diocese of Lansing will provide non-vaccinated employees with face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.

## Health Surveillance

The Diocese of Lansing requires all employees to self-screen from home prior to coming to work. If an employee is experiencing symptoms of illness, that employee is required to stay home for the duration of the symptoms.

Employees who experience symptoms while at work are instructed to let their immediate supervisor know and to go home until symptoms subside.

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

***If an employee is tested for COVID, whether they have symptoms or not, they may not return to work until they receive a negative test result. They must let their immediate supervisor know that they have been tested and whether they are experiencing symptoms.***

***If a non-vaccinated employee has had close contact (15 minutes of contact less than 6 feet apart) with someone within 48 hours of the person exhibiting symptoms of COVID or testing positive for COVID, the employee must self-quarantine according to the local health department guidelines.***

***If a non-vaccinated employee had close contact (15 minutes of contact less than 6 feet apart) with someone within 48 hours of the person exhibiting symptoms of COVID and the contact is seeking a test, the employee must self-quarantine according to the local health department guidelines or until the employee receives a medical determination that the close contact does not have COVID.***

***If a non-vaccinated employee takes an international flight, they must self-quarantine according to the local health department guidelines upon return to the US.***

The Diocese of Lansing 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 home where they are self-isolating during their illness.

The Diocese of Lansing 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, the employer 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, the Diocese of Lansing will not reveal the name or identity of the confirmed case.

The Diocese of Lansing 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

The Diocese of Lansing shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

<https://www.360training.com/course/coronavirus-awareness>

The Diocese of Lansing 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.

The local parish/school/agency shall create a record of the training. Records should include the name of the employee(s) trained and the date of the training.

### Recordkeeping

The local employer will maintain records of the following requirements:

- Training. The employer shall maintain a record of all COVID-19 employee training.

- 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.

## **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](http://www.michigan.gov/miosha).

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