



Blue Water Developmental Housing, Inc. COVID-19 Preparedness & Response Plan

General

The following COVID-19 Preparedness & Response Plan has been established for Blue Water Developmental Housing, Inc. (BWDH) in accordance with Michigan Occupational Safety and Health Administration (MIOSHA) Emergency Rules for Coronavirus disease 2019 (COVID-19) filed with the secretary of state October 14, 2020. 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. The administrative services division director has read these emergency rules carefully, developed the safeguards appropriate to BWDH based on its type of business or operation and has incorporated those safeguards into this COVID-19 Preparedness and Response Plan.

All employees are responsible for implementing, monitoring, and reporting on the COVID-19 control strategies developed in this plan. On each shift, an on-site employee will be designated as the COVID-19 safety coordinator for that shift and will be responsible for ensuring COVID-19 policies and procedures are followed and applicable reporting is completed within a timely manner. All employees will receive training on these responsibilities during new hire training and annually and will be directed to contact their direct supervisor for assistance if needed.

The plan will be made readily available to our employees and their representatives via electronically in Paycor, physically posted at each work site, and on the company website.

Responsibility

When it comes to ensuring a safe workplace during the COVID-19 outbreak, both managers and employees have their role to play. The following is a breakdown of the responsibilities for BWDH leadership and staff.

Managers and Supervisors

BWDH leadership, including managers and supervisors, should familiarize themselves with the details of this plan. Above all, leadership must be prepared to answer questions from employees and set a good example by adhering to the guidance prescribed in the plan. This involves practicing physical distancing and good personal hygiene.

Employees

Employees play a critical role in BWDH's COVID-19 prevention efforts. To protect everyone in the facility, it is important that all employees familiarize themselves with the details of this plan and follow related policies and procedures.

Pandemic Response Team

The pandemic response team is a cross-functional team that recommends and oversees workplace protocols to control the spread of COVID-19. The team will include the following roles:

- **Senior Leadership**. The executive director is responsible for the BWDH's overall response plan. The executive director and division directors are responsible for working with company stakeholders and relevant health and safety bodies to manage this plan.
- **Virus Prevention and Protocols**. Division directors are responsible for recommending and developing protocols to ensure the wellness of all employees. They are also tasked with overseeing procedures for isolating employees should they become sick at work.
- **Sanitization and Disinfection Lead**. Program supervisors manage logistics related to daily and periodic sanitation and disinfection efforts. Their responsibilities include ensuring that routine cleanings are completed and that the necessary cleaning supplies are readily available.
- **Executive Team**. The executive team comprised of the executive director and division directors are tasked with managing all pandemic-related communications. They will work with the human resources manager and internal communication stakeholders to ensure COVID-19 training is completed and that employees and their managers understand their role in preventing the spread of the disease. The executive director will provide COVID-19 related updates monthly and as needed.

Exposure Determination

BWDH 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. The administrative services division director was responsible for the exposure determination.

BWDH has determined that its employees' jobs fall into lower, medium, high, and very high-risk categories as defined by the OSHA Guidance on Preparing Workplaces for COVID-19:

- **Lower Exposure Risk Jobs**. Lower exposure risk job tasks and procedures are those that do not require contact with people known to be or suspected of being infected with SARS-CoV-2 nor frequent close contact (e.g., within 6 feet) with the general public. Workers in this category have minimal occupational contact with the public and other coworkers.
- **Medium Exposure Risk Jobs**. Medium exposure risk job tasks and procedures are those that require frequent or close contact (for example, within six feet) with general public, people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients.
- **High Exposure Risk Jobs**. High exposure risk job tasks and procedures are those with high potential for exposure to known or suspected sources of COVID-19. Workers in this category could include any employee performing direct care in the community and residential program settings.
- **Very High Exposure Risk Jobs**. Very high exposure risk job tasks and procedures are those with high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures. Workers in this category can include any employee performing direct care in the community and residential program settings; especially those performing procedures such as assistance with oral hygiene or attending medical appointments with individuals served where a healthcare provider may perform aerosol-generating procedures (e.g., intubation, cough induction procedures, bronchoscopies, some dental procedures and exams, or invasive specimen collection) on known or suspected COVID-19 patients.

BWDH 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 (Ex. Lower, Medium, High, Very High)	Qualifying Factors (Ex. No Public Contact, Public Contact)
Executive Director, Division Director, Fiscal Analyst, Human Resources Manager, Executive Secretary, Accounts Clerk, Billing Clerk, Secretarial Assistant, Community Based Program Supervisor, Community Based Assistant Program Supervisor, Community Based Program Support	Lower	Low or no public contact, no contact with anyone with SARS-CoV-2 or known or suspected COVID-19 patients.
Community Services Division Director, Community Based Program Supervisor, Community Based Assistant Program Supervisor, Community Based Program Support, Community Based Team Coordinator, Community Based Support Worker, Residential Services Division Director, Residential Program Supervisor, Residential Assistant	Medium	Contact with the public and other employees or individuals served who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients.

<p>Program Supervisor, Residential Technician II, Residential Technician I, *Sanborn Gratiot Memorial Home Program Supervisor, *Sanborn Gratiot Memorial Home Assistant Program Supervisor</p>		
<p>Community Services Division Director, Community Based Program Supervisor, Community Based Assistant Program Supervisor, Community Based Program Support, Community Based Team Coordinator, Community Based Support Worker, Residential Services Division Director, Residential Program Supervisor, Residential Assistant Program Supervisor, Residential Technician II, Residential Technician I, *Sanborn Gratiot Memorial Home Program Supervisor, *Sanborn Gratiot Memorial Home Assistant Program Supervisor</p>	<p>High</p>	<p>Potential for exposure to known or suspected sources of COVID-19.</p>
<p>Community Services Division Director, Community Based Team Coordinator, Community</p>	<p>Very high</p>	<p>Potential for exposure to known or suspected sources of COVID-19 while performing procedures such</p>

Based Support Worker, Residential Services Division Director, Residential Program Supervisor, Residential Assistant Program Supervisor, Residential Technician II, Residential Technician I, *Sanborn Gratiot Memorial Home Program Supervisor, *Sanborn Gratiot Memorial Home Assistant Program Supervisor		as assistance with oral hygiene or attending medical appointments with individuals served where a healthcare provider may perform aerosol-generating procedures (e.g., intubation, cough induction procedures, bronchoscopies, some dental procedures and exams, or invasive specimen collection) on known or suspected COVID-19 patients.
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*BWDH has a service agreement to provide administrative and managerial services to Sanborn Gratiot Memorial Home (SGMH). The SGMH will be responsible for following its own COVID-19 Preparedness and Response Plan; however, BWDH employs two staff, the SGMH program supervisor and SGMH assistant program supervisor, that work at the SGMH worksite and shall adhere to and be trained on both BWDH and SGMH COVID-19 Response and Preparedness Plans and organization policies and procedures.

Engineering Controls

BWDH 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

Division Directors 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
Front desk staff	Clear glass customer service window.

Administrative staff	Open windows to increase fresh air (weather permitting).
Community Based and Residential staff	Due to the nature of the work sites, engineering controls are not feasible.

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. The administrative services division 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 BWDH:

Job/Task	Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)
All employees	Maintain at least six feet from everyone at the worksite whenever possible.
Front desk employees	Use ground markings, signs, and physical barriers to prompt employees and visitors to remain six feet from others.
All employees	Restrict business-related travel for employees to essential travel only. When travel is essential check the CDC's Traveler's Health Notices to the latest guidance and recommendations.
All employees	Restrict face-to-face meetings. Communicate with others through phone, email, teleconferencing, and web conferencing. When face-to-face meetings are required, conduct meeting in well-ventilated area, wear face coverings, and maintain six (6) feet of distance from others.
Supervisors	Provide employees with required personal protection equipment.
All employees	Wear appropriate face coverings when six feet of separation from other individuals in the workplace cannot be consistently maintained and when in shared spaces including in-person meetings, restrooms, and hallways.

All employees	Wear appropriate face coverings when outside your own workspace or if another individual enters your workspace.
All employees	Require any visitors to wear face coverings.
All direct care employees	Always wear appropriate face coverings in community based and residential worksite settings.
All employees	Keep visitors informed about symptoms of COVID-19 and ask sick visitors to stay at home until healthy again. Encourage visitors to use email, fax, postal service, or drop box whenever possible.
All employees	Provide visitors at administrative office tissues and trash receptacles.
All employees	Promote curbside and delivery to minimize contact with public.
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.
All employees	Prohibit employees from using other workers phones, desks, offices, or other work tools and equipment, when possible.
Supervisors	Ensure postings are maintained for their worksite on the following topics: encouraging employees to stay away from the workplace when sick, cough and sneeze etiquette, and proper hand hygiene practices. Ensure postings are where they are likely to be seen.
Front desk employees	Reduce lobby capacity to the number of individuals who can be present while staying six (6) feet away from one another and ask employees, contractors, or other visitors, if possible, to wait in their cars until they are called in.
All employees	Place hand sanitizer at entrances. Ensure hand sanitizer is placed at multiple locations to encourage hand hygiene. Provide face covering if needed.
All employees	Practice proper hand hygiene: washing hands regularly with soap and water for at 20 seconds. An alcohol-based hand sanitizer containing at least 60% alcohol can also be used. Employees should clean their hands:

	<ul style="list-style-type: none"> • Before eating food • After using the restroom • After blowing their nose, coughing, or sneezing • After putting on, touching, or removing face Masks • Before and after work shifts • Periodically throughout the day • Before and after work breaks
All employees	Encourage employees to avoid touching their eyes, nose, and mouth whenever possible.
All employees	Restrict entry to essential visitors only.
All employees	Employees are encouraged to voice concerns regarding COVID-19 to their supervisors.
All employees	BWDH will encourage the use of digital files to reduce the need to exchange paper documents.
Individuals served	Take temperatures daily and record.

Hand Hygiene

Division directors 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, BWDH shall provide employees with antiseptic hand sanitizers or towelettes. BWDH will provide time for employees to wash hands frequently and to use hand sanitizer.

BWDH shall promote frequent and thorough hand washing, including by providing workers, individuals served, 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

BWDH 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). BWDH will make cleaning supplies available to employees at each worksite.

Division directors 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 BWDH 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.

Cleaners will be checked against the EPA List N Tool website to ensure they are effective against COVID-19. <https://cfpub.epa.gov/giwiz/disinfectants/index.cfm>

The following is a list of environmental surfaces, methods used to disinfect, and the frequency of such disinfection:

Administrative Building

Surface	Method/Disinfectant	Schedule/Frequency
Doorknobs/handles	Spray/Wiped/EPA Approved	Once per weekday
Light switches/plates	Spray/Wiped/EPA Approved	Once per weekday
Copiers/printers	Spray/Wiped/EPA Approved	Once per weekday
Tools/items used at copiers (i.e., pens, stapler, paper punch, scissors, etc.)	Spray/Wiped/EPA Approved	Once per weekday
Fax machines	Spray/Wiped/EPA Approved	Once per weekday
Phones	Spray/Wiped/EPA Approved	Once per weekday
Postage meter	Spray/Wiped/EPA Approved	Once per weekday
Computers/keyboards/wrist rests/mouse	Spray/Wiped/EPA Approved	Once per weekday
Scanners	Spray/Wiped/EPA Approved	Once per weekday
Desktops/tables	Spray/Wiped/EPA Approved	Once per weekday
File drawer pulls/handles	Spray/Wiped/EPA Approved	Once per weekday
Refrigerator handles	Spray/Wiped/EPA Approved	Once per weekday
Microwave handles/buttons	Spray/Wiped/EPA Approved	Once per weekday
Conference room	Spray/Wiped/EPA Approved	Once per day and

tabletops, computer/ keyboards/wrist rests/ mouse/conference phone		Immediately following every use
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Community Based Program Locations

Surface	Method/Disinfectant	Schedule/Frequency
Doorknobs/handles	Spray/Wiped/EPA Approved	Once per day
Light switches/plates	Spray/Wiped/EPA Approved	Once per day
Phones	Spray/Wiped/EPA Approved	Once per day
Refrigerator handles	Spray/Wiped/EPA Approved	Once per day
Microwave handles/buttons	Spray/Wiped/EPA Approved	Once per day
Washer/dryer door handles	Spray/Wiped/EPA Approved	Once per day

Residential Group Homes

Surface	Method/Disinfectant	Schedule/Frequency
Doorknobs/handles	Spray/Wiped/EPA Approved	Twice per shift
Light switches/plates	Spray/Wiped/EPA Approved	Twice per shift
Phones	Spray/Wiped/EPA Approved	Twice per shift
Counters/faucets/ sinks/toilets	Spray/Wiped/EPA Approved	Twice per shift
Pens	Spray/Wiped/EPA Approved	Twice per shift
Appliances/doors/handles	Spray/Wiped/EPA Approved	Twice per shift
Computers/keyboards/ wrist rests/mouse	Spray/Wiped/EPA Approved	Twice per shift
Printer	Spray/Wiped/EPA Approved	Twice per shift
Trash can lid	Spray/Wiped/EPA Approved	Twice per shift
Handrails	Spray/Wiped/EPA Approved	Twice per shift
Med cart counter/handles	Spray/Wiped/EPA Approved	Twice per shift
Furniture/cushions	Spray/Wiped/EPA Approved	Twice per shift
Dressers/desks/ tabletops/chairs	Spray/Wiped/EPA Approved	Twice per shift
Remote controllers	Spray/Wiped/EPA Approved	Twice per shift

Enhanced Cleaning and Disinfection

BWDH will perform enhanced cleaning and disinfection after persons confirmed to have COVID-19 have been in a work area. That employee will be sent home, their workspace will be immediately thoroughly cleaned using soap and water then with an EPA-approved disinfectant and temporarily closed. The employee's supervisor will be responsible for designating an employee for cleaning and disinfecting the workspace of anyone who has tested positive for COVID-19. Any employee conducting such cleaning shall wear disposable gloves when cleaning and disinfecting the workspace of an employee who has tested positive for COVID-19.

The schedule/frequency for each surface identified in the tables above for the administrative building and Community Based program locations will be increased from once daily to twice daily for seven days and Residential Program locations will be increased from twice per shift to three times per shift for seven days. Each division director will be responsible for seeing that this protocol is followed in their division.

Personal Protective Equipment (PPE)

BWDH will provide employees with the types of PPE equipment required for each job task, including respirators if necessary, for protection from SARS-CoV-2 appropriate to the exposure risk associated with the job. BWDH will follow current Centers for Disease Control and Prevention (CDC) and OSHA guidance for PPE.

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.

BWDH will provide necessary PPE to all employees and 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:

Job/Task	PPE
Lower risk exposure	Cloth face covering
Medium risk exposure	Medical mask, face shield or splash barrier, and disposable gloves
High risk exposure	N95 or higher respirator, goggles or face shield, isolation gown, and clean, non-sterile gloves
Very high-risk exposure	N95 or higher respirator, goggles or face shield, isolation gown, and clean, non-sterile gloves

Each work site will maintain their own inventory of PPE. Prior to leaving their shift, each designated safety coordinator shall inspect inventory levels. Any emergency needs shall be communicated to the appropriate team coordinator or supervisor immediately. Each site supervisor (team coordinators for community based and supervisors for residential) shall report weekly as designated by each division director, PPE current inventory levels and inventory needs for each work site by submitting a Request for Personal Protective Equipment form to the appropriate division director. Each division director shall ensure that a 30-day supply is readily available. Each division director will ensure inventory levels remain sufficient and that requests for PPE are satisfied appropriately.

Health Surveillance

BWDH 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. Division directors will be responsible for ensuring that all required health surveillance provisions are performed following BWDH's COVID-19 Health Surveillance procedure.

Before workers enter the place of employment at the start of each work shift, BWDH will have employees self-screen for COVID-19. Employees will be asked to assess if they have had any symptoms from the COVID-19 Symptom Chart develop in the last two weeks, if they have a temperature of 100.4 or higher (if they have access to a thermometer), if they had close contact with someone who was diagnosed with COVID-19 in the past two weeks or have been diagnosed with COVID-19 in the past two weeks. If an employee answers yes to any of those questions, they will be directed to stay home and follow the provisions outlined in the COVID-19 Employee Tracking procedure.

When employees arrive to the worksite BWDH 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. BWDH 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 their direct supervisor before and during the work shift. BWDH has provided employees with instructions for how to make such a report to the employer.

The specific instructions for employees reporting signs and symptoms of COVID-19 are as indicated in the procedures:

- Requiring COVID-19 Employee Tracking Procedure
- Requiring COVID-19 Health Surveillance Questionnaire Procedure

BWDH 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:

- Requiring employees to self-screen prior to entering the workplace and requiring a self-screening to be documented at the workplace at the beginning of an employee's shift.
- Not allowing employees who have COVID-19 symptoms to report to work.
- Requiring employees who have reported COVID-19 symptoms prior to the start of their shift or during their shift, is a confirmed close contact, or has tested positive for COVID-19, to self-isolate or self-quarantine following the organization's COVID-19 Employee Tracking procedure, which is based on the current CDC or local health department recommendations.

BWDH 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 individual served or worksite visitor is identified with a confirmed case of COVID-19, the appropriate division director will be responsible for ensuring notification is provided to the applicable 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, BWDH will not reveal the name or identity of the confirmed case.

The human resources manager will be responsible for reporting employee confirmed cases to the applicable local health department immediately and any coworkers, 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, BWDH will not reveal the name or identity of the confirmed case.

St. Clair County Health Department reporting shall be done through the following link: <https://www.stclaircounty.org/offices/health/covid19.aspx>

Select “Employer or Organization” under “Report a Positive COVID-19 Case” and submit requested information.

Macomb County Health Department reporting shall be done through the following link: <https://business.macombgov.org/business-ResourcesBusinessesCovid-19>

Select “online reporting from” and submit requested information.

BWDH 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, have completed the required self-isolation or self-quarantine, and meet the criteria to safely return as outlined in the organization’s COVID-19 Employee Tracking procedure.

If an employee is considered a close contact based on the CDC definition but has not tested positive and has no symptoms, the employee may continue to work or return from quarantine early. This practice is a last resort and will only be authorized when a staffing shortage arises. See the Employee Tracking procedure for specific guidance.

Training

The administrative services division director shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

BWDH will train workers on, at a minimum:

- Workplace infection-control practices.

- The proper use of PPE.
- 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 administrative services division director shall create a record of the training. Records should include the name of the employee(s) trained and the date of the training.

Recordkeeping

BWDH 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.
- **Contact Tracing:** 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 coworkers, contractors, or suppliers who may have come into contact with the person who was the confirmed case of COVID-19.

The administrative services division director will ensure that the records are kept. Employers are required to maintain records for one (1) year from time of generation.

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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