

COVID-19 Preparedness and Response Plan

Effective June 10, 2020

INTRODUCTION

City of New Buffalo, Michigan (hereinafter “City”) takes the health and safety of our workers very seriously. With the spread of the coronavirus or “COVID-19,” a respiratory disease caused by the SARS-CoV-2 virus, the City must remain vigilant in mitigating COVID-19’s impact. In order to promote safety and maintain operations, we have developed this COVID-19 Preparedness and Response Plan (“Plan”) to be implemented effective as of June 10, 2020 throughout the City.

This Plan is based on information available from the U.S. Department of Health and Human Services’ Centers for Disease Control and Prevention (“CDC”), the U.S. Department of Labor’s Occupational Safety and Health Administration (“OSHA”), Mich. Exec. Order No. 2020-36 (Apr. 3, 2020), https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705-524136--,00.html (“Order 2020-36”), Mich. Exec. Order No. 2020-110 (June 1, 2020), https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705-530620--,00.html (“Order 2020-110”), and Mich. Exec. Order No. 2020-114 (June 5, 2020), https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705-531123--,00.html (“Order 2020-114”) at the time of its development, and is subject to change based on further information provided by the CDC, OSHA, and other public officials. The City may also amend this Plan based on operational needs.

The City will use good faith, at all times, in employing the safety measures and procedures of the Plan.

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RESPONSIBILITIES OF MANAGERS AND SUPERVISORS

All managers and supervisors must be familiar with this Plan and be ready to answer questions from employees. Managers and supervisors must follow this Plan at all times at work. Managers and supervisors must require this same behavior from all employees.

RESPONSIBILITIES OF EMPLOYEES

In our efforts to protect the health and safety of our employees, the City is asking every one of our employees to play their part. As set forth in this Plan, the City has instituted various practices, which all employees must follow at work. If employees have specific questions about this Plan or COVID-19, such employees should ask the City's workplace coordinator responsible for COVID-19 issues or their manager or supervisor.

BASIC INFECTION PREVENTION MEASURES

The City has implemented the following basic infection prevention measures.

All managers, supervisors, and employees of the City (collectively, "workers") must:

- Frequently and thoroughly wash their hands with soap and water for at least 20 seconds.
 - Use an alcohol-based hand rub with at least 60% alcohol if soap and running water are not immediately available.
- Avoid touching their eyes, noses, or mouths with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering coughs and sneezes.
- Stay home if they are sick.
- Refrain from using other workers' phones, desks, offices, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.
- Adhere to social distancing practices and mitigation measures recommended by the CDC, including but not limited to:
 - Remaining at least 6 feet from people from outside the workers' households to the extent feasible under the circumstances.
 - Wearing cloth masks outside their homes where other social distancing practices are difficult to follow, and especially in areas of significant community-based transmission.
- Wear a covering over their noses and mouths—such as a homemade mask, scarf, bandana, or handkerchief—when:
 - in any enclosed public space if they are able to medically tolerate a face covering; or
 - workers cannot consistently maintain 6 feet of separation from other individuals in the workplace.

The City has to date and/or must:

- Require any work that is capable of being performed remotely (i.e., without the worker leaving his or her home or place of residence) be performed remotely.

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- Establish policies and practices to promote remote work to the fullest extent possible, such as flexible worksites (e.g., telecommuting) and flexible work hours (e.g., staggered shifts) to increase the physical distance among workers and between workers and others in accordance with mandatory social distancing measures.
- Stay abreast of guidance from federal, state, local, tribal, and/or territorial health agencies, and consider how to incorporate those recommendations and resources into the Plan.
- Make cleaning supplies available to workers upon entry and at the worksite.
 - Provide workers, constituents, and worksite visitors with a place to wash their hands.
 - Provide them an alcohol-based hand rub with at least 60% alcohol if soap and running water are not immediately available.
 - Provide workers time to wash hands frequently or to use hand sanitizer.
- Provide workers, constituents, and the public access to tissues and trash receptacles in City facilities and worksites.
- Keep everyone on the worksite premises at least 6 feet from one another to the maximum extent possible, including through the use of ground markings, signs, and physical barriers, as appropriate to the worksite.
- Conduct a daily entry self-screening protocol for all workers or contractors entering the workplace, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19.
 - An individual may be required to temporarily remove a face covering upon entering an enclosed public space for identification purposes.
 - The City must maintain a record of the daily self-screenings.
 - The City, and those authorized to act on its behalf, are permitted to deny entry or access to any City facility to any individual who refuses to comply with requirements regarding wearing a covering over one's nose and mouth.
- Follow social distancing practices and mitigation measures recommended by the CDC, to the extent practicable and applicable to the City's operations.
- Establish an emergency communications plan.
 - Identify key contacts (with back-ups), chain of communications (including suppliers and applicable constituents), and processes for tracking and communicating about work and worker status.
 - Share Plan with workers and clearly communicate expectations.
- Conduct a thorough hazard assessment to determine if workplace hazards are present, or are likely to be present, and determine what type of controls or PPE are needed for specific job duties.
- Modify the layout of lobbies, break rooms, lunch rooms, and other common areas to reduce the number of tables, chairs, and other furniture to maintain proper social distancing practices as necessary.
- Restrict work-related travel for workers to essential travel only.
- Encourage workers to use Personal Protective Equipment ("PPE") and hand sanitizer on public transportation.
- Provide to its workers, at a minimum, non-medical grade face coverings.

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- Supplies of N95 masks and surgical masks should generally be reserved, for now, for health care professionals, first responders (e.g., police officers, fire fighters, paramedics), and other critical workers.
- Consider face shields when workers cannot consistently maintain 3 feet of separation from other individuals in the workplace.
- Enhance regular housekeeping practices to limit exposure to COVID-19, including increasing the frequency and thoroughness of cleaning and disinfecting of surfaces, equipment, and other elements of the work environment, especially high-touch surfaces (e.g., door handles) and parts, products, and shared equipment (e.g., tools, machinery, vehicles), and use U.S. Environmental Protection Agency (“EPA”)-approved disinfectants with claims against emerging viral pathogens and follow the manufacturer’s instructions for use of all cleaning and disinfection products (e.g., concentration, application method and contact time, and PPE).
 - If practicable, provide disposable wipes so that commonly used surfaces (for example, doorknobs, keyboards, remote controls, desks, other work tools and equipment) can be wiped down by workers before each use.
 - Follow the CDC’s Interim Recommendations for U.S. Community Facilities with Suspected/Confirmed Coronavirus Disease 2019 (COVID-19) (<https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html>) if a City facility has a suspected or confirmed case of COVID-19.

OFFICE-SPECIFIC INFECTION PREVENTION MEASURES

At City offices, the City has to date and/or must:

- Assign dedicated entry point(s) for all workers to reduce congestion at the main entrance.
- Provide visual indicators of appropriate spacing for workers outside the building in case of congestion.
- Take steps to reduce entry congestion and to ensure the effectiveness of screening (e.g., by staggering start times, adopting a rotational schedule in only half of workers are in the office at a particular time).
- Require face coverings in shared spaces, including during in-person meetings and in restrooms and hallways.
- Increase distancing between workers by spreading out workspaces, staggering workspace usage, restricting non-essential common space (e.g., cafeterias), providing visual cues to guide movement and activity (e.g., restricting elevator capacity with markings).
- Prohibit social gatherings and meetings that do not allow for social distancing or that create unnecessary movement through the office. Use virtual meetings whenever possible.
- Provide disinfecting supplies and require workers wipe down their work stations at least twice daily.
- Post signs about the importance of personal hygiene.
- Disinfect high-touch surfaces in offices (e.g., whiteboard markers, restrooms, handles) and minimize shared items when possible (e.g., pens, remotes, whiteboards).
- Institute cleaning and communications protocols when workers are sent home with symptoms.

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- Notify workers if the City learns that an individual (including a constituent, supplier, or visitor) with a confirmed case of COVID-19 has visited the office.
- Suspend all nonessential visits by others.
- Restrict all non-essential travel, including in-person conference events.

OUTDOOR WORK-SPECIFIC INFECTION PREVENTION MEASURES

The City has to date and/or must:

- Prohibit gatherings of any size in which people cannot maintain 6 feet of distance from one another.
- Limit in-person interaction with constituents and others to the maximum extent possible, and bar any such interaction in which people cannot maintain 6 feet of distance from one another.
- Provide and require the use of PPE such as gloves, goggles, face shields, and face coverings, as appropriate for the activity being performed.
- Adopt protocols to limit the sharing of tools and equipment to the maximum extent possible and to ensure frequent and thorough cleaning and disinfection of tools, equipment, and frequently touched surfaces.

Unless otherwise prohibited by local regulation, outdoor parks and recreational facilities may be open, provided that the City makes any reasonable modifications necessary to enable workers and patrons not part of the same household to maintain six feet of distance from one another, and provided that areas in which social distancing cannot be maintained be closed, subject to guidance issued by the Department of Health and Human Services.

CONSTRUCTION-SPECIFIC INFECTION PREVENTION MEASURES

The City has to date and/or must:

- Conduct a daily entry screening protocol for workers, contractors, suppliers, and any other individuals entering a worksite, including a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19, together with, if possible, a temperature screening.
- Create dedicated entry point(s) at every worksite, if possible, for daily screening as provided in the above sub-provision, or in the alternative, issue stickers or other indicators to workers to show that they received a screening before entering the worksite that day.
- Provide instructions for the distribution of PPE and designate on-site locations for soiled face coverings.
- Require the use of work gloves where appropriate to prevent skin contact with contaminated surfaces.
- Identify choke points and high-risk areas where workers must stand near one another (such as hallways, hoists and elevators, break areas, water stations, and buses) and control their access and use (including through physical barriers) so that social distancing is maintained.
- Ensure there are sufficient hand-washing or hand-sanitizing stations at the worksite to enable easy access by workers.

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- Notify contractors (if a subcontractor) or owners (if a contractor) of any confirmed COVID-19 cases among workers at the worksite.
- Restrict unnecessary movement between project sites.
- Create protocols for minimizing personal contact upon delivery of materials to the worksite.
- Allow workers to wear masks over their nose and mouth to prevent them from spreading the virus.
- Continue to use other normal control measures, including PPE, necessary to protect workers from other job hazards associated with construction activities.
- Advise workers to avoid physical contact with others and direct workers/contractors/visitors to increase personal space to at least 6 feet, where possible.
- Where work trailers are used, direct all workers to maintain social distancing while inside the trailers.
- Train workers how to properly put on, use/wear, and take off protective clothing and equipment.
- Use Environmental Protection Agency-approved cleaning chemicals from List N or that have label claims against the coronavirus.
- To the extent tools or equipment must be shared, provide and instruct workers to use alcohol-based wipes to clean tools before and after use.
 - When cleaning tools and equipment, workers should consult manufacturer recommendations for proper cleaning techniques and restrictions.
- Keep in-person meetings (including toolbox talks and safety meetings) as short as possible, limit the number of workers in attendance, and use social distancing practices.
- Clean and disinfect portable jobsite toilets regularly.
 - Hand sanitizer dispensers should be filled regularly.
 - Frequently-touched items (i.e., door pulls and toilet seats) should be disinfected.
- Encourage workers to report any safety and health concerns.

FIRST RESPONDER-SPECIFIC INFECTION PREVENTION MEASURES

The City has to date and/or must:

- For firefighters, EMS providers, law enforcement, and other first responders, follow the CDC's First Responder Guidance (<https://www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-for-ems.html>), Information for Law Enforcement Personnel (<https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-law-enforcement.html>), and Information for Firefighters & EMS Providers at <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/firefighter-EMS.html>, to the extent practicable and applicable to the City's operations.
- Have a trained Emergency Medical Service/Emergency Medical Technician ("EMS/EMT") assess and transport anyone that might have COVID-19 to a healthcare facility.
- Ensure only trained personnel wearing appropriate PPE have contact with individuals who have or may have COVID-19.

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- The City must provide protection that is at least as great as that provided by the minimum amount of PPE recommended. Different styles of PPE may be necessary to perform operational duties.
 - The minimum PPE recommended for first responders is:
 - A single pair of disposable examination gloves.
 - Disposable isolation gown or single use/disposable coveralls.
 - If unable to wear a disposable gown or coveralls because it limits access to duty belt and gear, ensure duty belt and gear are disinfected after contact with individual.
 - Any NIOSH-approved particulate respirator (i.e., N-95 or higher level respirator).
 - Facemasks may be an acceptable alternative under certain circumstances if there are supply issues with respirators.
 - Eye protection (i.e., goggles or disposable face shield that fully covers the front and sides of the face).
- Ensure that first responders clean and disinfect duty belts and gear prior to reuse.
- Follow standard operating procedures for the reusing, reprocessing, storing, and disposal of used or compromised PPE.
 - Follow CDC Guidance on how to Optimize PPE Supply (<https://www.cdc.gov/coronavirus/2019-ncov/hcp/ppe-strategy/index.html>).
 - Should reserve PPE (e.g., medical facemasks, N95 respirators) for first responders.
- Follow standard operating procedures and CDC Guidance for containing and laundering clothes.
 - Ensure that first responders avoid shaking the clothes.
- Require patients, suspects, victims, or other individuals encountering first responders to wear facemasks or cloth face coverings for source control, if they can tolerate it.
- Limit the number of first responders in vehicle compartments with patients, suspects, victims, or other individuals to minimize possible exposures.
- Use EPA-registered hospital-grade disinfectant to disinfect non-porous surfaces of ambulances, gurneys, clipboards, radios, and other frequently touched surfaces or equipment according to the manufacturer's recommendations.
 - Non-porous surfaces of PPE such as powered air-purifying respirators ("PAPRs") should be cleaned and disinfected in accordance with the manufacturer's recommendation.
- Deliver up-to-date safety messaging on the current status of resources and protocols.
- Use National Incident Management System ("NIMS") forms to document protective actions.
- Fit test first responders for appropriate respirators.
 - Train them on proper donning, doffing, and maintenance of all PPE.
 - All PPE should be accessible to first responders when needed and available.
- Implement a specific protocol with dispatch centers to determine if a caller or patient may have signs or symptoms and risk factors for COVID-19, and communicate that information to first responders.
- During pre-hospital care, take steps for universal source control for anyone (e.g., first responders, patients, family members), regardless of whether they have symptoms:
 - Cloth face coverings are not considered PPE but can be used for source control.

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- Follow CDC guidance for when first responders can return to work:
 - Following potential exposure to patients with COVID-19.
 - After being diagnosed with confirmed or suspected COVID-19.

ENVIRONMENTAL SERVICES-SPECIFIC INFECTION PREVENTION MEASURES

The City has to date and/or must:

- Follow OSHA Guidance on Environmental Services Workers and Employers (<https://www.osha.gov/SLTC/covid-19/environmental-services.html>), Environmental Cleaning and Decontamination (https://www.osha.gov/SLTC/covid-19/controlprevention.html#environmental_cleaning), and Disinfecting Your Facility (<https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>).
- Assess the hazards to which environmental services workers (i.e., janitorial, cleaning) may be exposed; evaluate the risk of exposure; and select, implement, and ensure environmental services workers use controls to prevent exposure.
- Generally, not take special precautions beyond those already used to protect environmental services workers from the hazards they encounter during their routine job tasks.
 - However, various combinations of engineering and administrative controls, safe work practices, and PPE may be appropriate for environmental services workers, depending on the results of the City's hazard and risk assessments.

SANITATION AND WASTEWATER MANAGEMENT-SPECIFIC INFECTION PREVENTION MEASURES

The City has to date and/or must:

- Follow CDC Guidance on Sanitation and Wastewater Workers (<https://www.cdc.gov/coronavirus/2019-ncov/community/sanitation-wastewater-workers.html>).
- Follow OSHA Guidance on Solid Waste and Wastewater Management Workers and Employers (<https://www.osha.gov/SLTC/covid-19/solid-waste-wastewater-mgmt.html>).

POLICIES AND PROCEDURES FOR PROMPT IDENTIFICATION AND ISOLATION OF SICK PEOPLE

Prompt identification and isolation of potentially infectious individuals is a critical step in protecting workers, constituents, visitors, and others at a worksite.

The City has implemented and/or must implement the following policies and procedures for prompt identification and isolation of sick people:

- Workers must self-monitor for signs and symptoms of COVID-19 if they suspect possible exposure.

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- Workers exhibiting signs and symptoms of COVID-19 or suspecting exposure to COVID-19 are prohibited from entering any City premise or client-worksites.
- Workers testing positive for COVID-19 or demonstrating principal symptoms of COVID-19, such as fever, atypical cough, or atypical shortness of breath must not come into work.
 - Instead, such workers must notify their manager or supervisor right away.
 - Such workers may only come into work:
 - After 3 days have elapsed since their symptoms resolved, and 14 days have passed since their symptoms first appeared or since they were swabbed for the test that yielded the positive result; or
 - After their symptoms have resolved and they have received negative results of an FDA Emergency Use Authorized molecular assay for COVID-19 from at least 2 consecutive respiratory specimens collected ≥ 24 hours apart (total of 2 negative specimens).
- Workers must not come into work if they have had close contact with an individual who tests positive for COVID-19 or with an individual who displays one or more of the principal symptoms of COVID-19 (fever, atypical cough, or atypical shortness of breath).
 - Instead, such workers must notify their manager or supervisor right away.
 - Such workers may only come into work:
 - After 14 days have passed since the last close contact with the sick or symptomatic individual assuming they have not subsequently developed symptoms; or
 - They have received negative results of an FDA Emergency Use Authorized molecular assay for COVID-19 from at least 2 consecutive respiratory specimens collected ≥ 24 hours apart (total of 2 negative specimens).
- The City will designate and train certain workers as point persons for how to immediately isolate a person who shows symptoms of COVID-19 at work.
 - In such a case, while maintaining proper social distancing, the point person should take the potentially infectious person to a location away from workers, constituents, and other visitors.
 - If not acutely sick, send the potentially infectious person home and instruct them to call a medical provider.
 - If acutely sick, refer the potentially infectious person to a medical facility.
 - Although most worksites do not have specific isolation rooms, designated areas with closable doors may serve as isolation rooms until a potentially sick person can be removed from the worksite.
- The City must take steps to limit spread of the respiratory secretions of a person who may have COVID-19, including providing a face mask and asking the person to wear it.
- If possible, the City must isolate people suspected of having COVID-19 separately from those with confirmed cases to prevent further transmission using either a permanent (e.g., wall/different room) or temporary barrier (e.g., plastic sheeting).
- The City must restrict the number of workers and others entering isolation areas.
- The City must protect workers in close contact with (i.e., within 6 feet of) a sick person or who have prolonged/repeated contact with such persons by using additional engineering and administrative controls, safe work practices, and PPE.
- If a worker is confirmed to have COVID-19 or has been determined to be presumptively positive for COVID-19, the City must notify the local public health department

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immediately and any fellow workers, contractors, or suppliers who may have come into contact with the person confirmed, or presumptively determined, to have COVID-19 of their possible exposure to COVID-19 in the workplace within 24 hours but maintain confidentiality as required by the Americans with Disabilities Act (“ADA”).

- The City must maintain a record of making any such notifications.
- The City will instruct such fellow workers and any other applicable individuals about how to proceed based on the CDC Public Health Recommendations for Community-Related Exposure (<https://www.cdc.gov/coronavirus/2019-ncov/php/public-health-recommendations.html>).
- If a sick worker is suspected or confirmed to have COVID-19, the City will follow the CDC cleaning and disinfection recommendations, which may include temporary closures of all or part of the workplace to allow for deep cleaning.

WORKPLACE FLEXIBILITIES AND PROTECTIONS

The City is first and foremost concerned about the health and safety of its workers. The City’s policies and procedures serve to protect its workers and their families.

The City has implemented and/or must implement the following workplace flexibilities:

- Unless other leave or payments required and/or permitted by law are available, the City will treat a worker who is absent from work because that worker is at particular risk of infecting others with COVID-19 pursuant to the City’s leave policies and the Families First Coronavirus Response Act as applicable.
- The City will follow Order 2020-36, and any executive orders that follow it, that prohibit discharging, disciplining, or otherwise retaliating against workers who stay home or who leave work when they are at particular risk of infecting others with COVID-19.
 - However, those workers who are allowed to return to work but decline to do so may face discipline up to and including termination of employment.
 - Furthermore, workers who return to work, if they test positive for COVID-19 or who display one or more of the principal symptoms of COVID-19, before 3 days have elapsed since their symptoms resolved, or before 14 days have passed since their symptoms first appeared or since they were swabbed for the test that yielded the positive result, or before 14 days have passed since the last close contact with a sick or symptomatic individual, or the symptomatic individual receives a negative COVID-19 test may be disciplined up to and including termination of employment because such behavior places other workers and their families at an increased risk of contracting COVID-19.
 - The City will allow workers 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 and they are released from any quarantine or isolation by the local public health department.
- Although the City will not require a healthcare provider’s note for workers who are sick with COVID-19, unless otherwise permitted by law, to validate their illness or to return to work, the City expects workers to utilize honest, good-faith, and honorable conduct when making decisions regarding COVID-19 related sick leave and returning to work.

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- In the event leave is related to the care of a family member who is sick with COVID-19 while the worker is not, the City will try, to the extent possible, to utilize the worker in a remote working capacity in order to reduce the leave necessary for the worker to expend. However, there are circumstances and worker-titles that do not support remote working and possibly cannot be accommodated.

The City has implemented and/or must implement the following workplace protections:

- The City will communicate with any businesses that provide the City with contract or temporary workers about the importance of sick workers staying home and encourage the businesses to develop non-punitive leave policies that comply with applicable law.
- The City's policies and procedures pertaining to COVID-19 are contained in this guide. Such policies and procedures and other best practices will be disseminated via electronic communication, and posted at all worker entrances, exits, and common areas.
- Within two weeks of resuming in-person activities, the City must make the Plan readily available to workers, labor unions, and constituents, whether via website, internal network, or by hard copy.
- [INSERT] Department and, specifically, [INSERT CONTACT NAME] will have the complete compilation of the City's workplace protections and other related policies. These policies and procedures can be reviewed at any point during business hours.
- [INSERT] Department and, specifically, [INSERT CONTACT NAME] will have information specific to the medical insurance plan offered by the City. Workers should contact the aforementioned with questions about medical care in the event of a COVID-19 outbreak.
- [INSERT CONTACT NAME] will be the workplace coordinator(s) who will be responsible for implementing, monitoring, and reporting on the COVID-19 control strategies developed under the Plan.
 - At least one workplace coordinator must remain on-site at all times when workers are present on site.
 - An on-site worker may be designated to perform the workplace coordinator role.
 - The workplace coordinator will be responsible for designating and training workers as point persons to help manage COVID-19 issues and their impact at the workplace.
 - The workplace coordinator will provide, and maintain a record of, COVID-19 training to all workers that covers, at a minimum:
 - Workplace infection-control practices.
 - The proper use of PPE.
 - Steps the worker must take to notify the City of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
 - How to report unsafe working conditions.
 - The workplace coordinator must be familiar with OSHA's Guidance on Preparing Workplaces for COVID-19 (attached as **Appendix 2**) and ensure that the City follows such guidance.

EXISTING OSHA STANDARDS

While there is no specific OSHA standard covering exposure to COVID-19, existing OSHA standards may apply to protect workers from such exposure. Hence, the City must follow all existing OSHA standards.

CONTINGENCY PLANS

The City must follow federal and state, local, tribal, and/or territorial recommendations regarding development of contingency plans for situations that may arise as a result of outbreaks, such as:

- Increased rates of worker absenteeism.
- The need for social distancing, staggered work shifts, downsizing operations, delivering services remotely, and other exposure-reducing measures.
- Options for conducting essential operations with a reduced workforce, including cross-training workers across different jobs in order to continue operations or deliver surge services.
- Interrupted supply chains or delayed deliveries.

LEVEL OF RISK OF OCCUPATIONAL EXPOSURE

The City must determine the level(s) of risk of occupational exposure to COVID-19 associated with various worksites and job tasks workers perform at those sites. During an outbreak, the levels may vary from very high to high, medium, or lower (caution) risk. The level of risk depends in part on the industry type, need for contact within 6 feet of people known to be, or suspected of being, infected with SARS-CoV-2, or requirement for repeated or extended contact with persons known to be, or suspected of being, infected with SARS-CoV-2.

Very High Exposure Risk

Very high exposure risk jobs 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 include:

- Healthcare workers (e.g., doctors, nurses, dentists, paramedics, emergency medical technicians) performing 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.
- Healthcare or laboratory personnel collecting or handling specimens from known or suspected COVID-19 patients (e.g., manipulating cultures from known or suspected COVID-19 patients).
- Morgue workers performing autopsies, which generally involve aerosol-generating procedures, on the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death.

High Exposure Risk

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High exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19. Workers in this category include:

- Healthcare delivery and support staff (e.g., doctors, nurses, and other hospital staff who must enter patients' rooms) exposed to known or suspected COVID-19 patients. (Note: when such workers perform aerosol-generating procedures, their exposure risk level becomes very high.)
- Medical transport workers (e.g., ambulance vehicle operators) moving known or suspected COVID-19 patients in enclosed vehicles.
- Mortuary workers involved in preparing (e.g., for burial or cremation) the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death.

Medium Exposure Risk

Medium exposure risk jobs include those that require frequent and/or close contact with (i.e., within 6 feet of) people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients. In areas without ongoing community transmission, workers in this risk group may have frequent contact with travelers who may return from international locations with widespread COVID-19 transmission. In areas where there is ongoing community transmission, workers in this category may have contact with the general public (e.g., schools, high-population-density work environments, some high-volume retail settings).

Lower Exposure Risk (Caution)

Lower exposure risk (caution) jobs 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 with (i.e., within 6 feet of) the general public. Workers in this category have minimal occupational contact with the public and other coworkers.

The City has determined that it has medium exposure risk for its workers.

PROTECTING WORKERS WITH JOBS AT MEDIUM EXPOSURE RISK

The City must implement workplace controls sufficient to protect workers with jobs at medium exposure risk.

Engineering Controls

Engineering controls involve isolating workers from work-related hazards.

The City has implemented and/or must implement the following engineering controls:

- Install physical barriers, such as clear plastic sneeze guards, where feasible.
- For work activities where social distancing is a challenge, consider limiting the duration of these activities and/or implementing innovative approaches, such as temporarily moving

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or repositioning workstations to create more distance or installing barriers (e.g., plexiglass shields) between workstations.

- Ensure the safety of the City's building(s) water system(s).
- Ensure that other engineering controls, if any, used to protect workers from other job hazards continue to function as intended.

The City should consider improving the City's building(s) ventilation system(s). This may include some or all of the following activities:

- Increase ventilation rates.
- Ensure ventilation systems operate properly and provide acceptable indoor air quality for the current occupancy level for each space.
- Increase outdoor air ventilation, using caution in highly polluted areas. With a lower occupancy level in the building, this increases the effective dilution ventilation per person.
- Disable demand-controlled ventilation ("DCV").
- Further open minimum outdoor air dampers (as high as 100%) to reduce or eliminate recirculation. In mild weather, this will not affect thermal comfort or humidity. However, this may be difficult to do in cold or hot weather.
- Improve central air filtration to the MERV-13 or the highest compatible with the filter rack, and seal edges of the filter to limit bypass.
- Check filters to ensure they are within service life and appropriately installed.
- Keep systems running longer hours, 24/7 if possible, to enhance air exchanges in the building space.

Administrative Controls

Administrative controls require action by the worker or City. Typically, administrative controls are changes in work policy or procedures to reduce or minimize exposure to a hazard.

The City has implemented and/or must implement the following administrative controls:

- Offer face masks to ill workers (and constituents where practicable and on-site) to contain respiratory secretions until they are able leave the workplace (i.e., for medical evaluation/care or to return home). In the event of a shortage of masks, a reusable face shield that can be decontaminated will be used.
- Will, to the extent practicable, follow CDC/NIOSH guidance for optimizing respirator supplies, which discusses the use of surgical masks, at: www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy.
- Keep constituents informed about symptoms of COVID-19 and ask sick constituents to minimize contact with workers until healthy again by posting signs about COVID-19 in City facilities where sick constituents may visit or including COVID-19 information in automated messages.
- Limit constituents' and the public's access to the worksite, or restrict access to only certain workplace areas.
- Implement strategies to minimize face-to-face contact through telework and phone-based communications.

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- Communicate the availability of medical screening or other worker health resources.
- Monitor public health communications about COVID-19 recommendations and ensure that workers have access to that information.
- Frequently check the CDC COVID-19 website: www.cdc.gov/coronavirus/2019-ncov.
- Collaborate with workers to designate effective means of communicating important COVID-19 information.

Personal Protective Equipment

Examples of PPE include: gloves, goggles, face shields, face masks, and respiratory protection. During an outbreak of COVID-19, recommendations for PPE specific to occupations or job tasks may change depending on geographic location, updated risk assessments for workers, and information on PPE effectiveness in preventing the spread of COVID-19.

The City must check the OSHA and CDC websites regularly for updates about recommended PPE.

- [INSERT HERE]
- [NOTE TO CITY: When selecting PPE, consider factors such as function, fit, decontamination ability, disposal, and cost.
 - Evaluate whether PPE will have to be used repeatedly for a long period of time, and determine whether a more expensive and durable type of PPE may be less expensive overall than disposable PPE.
 - Select the combination of PPE that protects workers specific to its workplace.
- Evaluate the need for use of respirators, and if determined that it is applicable, review and implement information from OSHA's COVID-19 webpage: www.osha.gov/covid-19 on respirators.

Workers with medium exposure risk may need to wear some combination of gloves, a gown, a face mask, and/or a face shield or goggles. PPE ensembles for workers in the medium exposure risk category will vary by work task, the results of the City's hazard assessment, and the types of exposures workers have on the job. The City will clearly direct workers to the specific PPE required in the workers' job task.]

Workers should continue to use the PPE, if any, that they would ordinarily use for other job tasks.

ADDITIONAL LEGAL REQUIREMENTS AND EXCEPTIONS

The City has to date and/or must:

- Follow the CDC's Interim Guidance for Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19, attached as **Appendix 1**, to the extent practicable and applicable to the City's operations.
- Follow OSHA's Guidance on Preparing Workplaces for COVID-19, attached as **Appendix 2**, to the extent practicable and applicable to the City's operations. Such plan must be available at City headquarters or the City's worksite.

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For additional legal requirements and exceptions as well as CDC and OSHA guidance, please see the following:

- Interim Guidance for Businesses and Employers at https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fspecific-groups%2Fguidance-business-response.html.
- Guidance on Hazard Recognition at <https://www.osha.gov/SLTC/covid-19/hazardrecognition.html>.
- COVID-19 Control and Prevention at https://www.osha.gov/SLTC/covid-19/controlprevention.html#interim_guidance.
- Prepare your Small Business and Employees for the Effects of COVID-19 at <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-small-business.html>.
- Discontinuation of Isolation for Persons with COVID-19 Not in Healthcare Settings at <https://www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html>.
- Covid-19 Guidance for the Construction Workforce at <https://www.osha.gov/Publications/OSHA4000.pdf>.