

BEDFORD PUBLIC SCHOOLS

COVID-19 WORKPLACE SAFETY PREPAREDNESS AND RESPONSE PLAN

In accordance with Emergency Rules issued by the Michigan Occupational Safety and Health Administration (“MIOSHA”) in response to the novel coronavirus (COVID-19), the District has developed this COVID-19 Preparedness and Response Plan to provide for the health and safety of District employees, contractors, students, and visitors while on District property. This plan takes into account guidance from the Centers for Disease Control and Prevention (the “CDC”) and guidance from the Michigan Department of Health and Human Services (“MDHHS”), as well as other sources.

I. Definitions

For purposes of this COVID-19 Preparedness and Response Plan, the following definitions apply:

- A. **Symptoms of COVID-19** the symptoms of COVID-19 include fever, cough, fatigue, and shortness of breath. The District will also refer to CDC and MDHHS guidance for the most current information available on the symptoms of COVID-19.
- B. **Close contact** means someone who was within 6 feet of an infected person for at least 15 minutes from 2 days before illness onset (or, for asymptomatic patients, 2 days prior to specimen collection) until the time the person is isolated. The District will also consider the most recent guidance from the CDC and MDHHS when determining what constitutes close contact.
- C. **Known case of COVID-19** means a person who have been confirmed through diagnostic testing to have COVID-19.
- D. **Suspected case of COVID-19** means a person who has symptoms of COVID-19 but has not been confirmed through diagnostic testing or person who has had close contact with a person who has been confirmed through diagnostic testing to have COVID-19.

II. Measures to Prevent Exposure

The District is taking the following steps, consistent with MIOSHA Emergency Rules 5, 6, 7 and 8 and with the employee exposure risk determinations set forth in Section VI, below, to mitigate the risk of exposure to COVID-19 for students, staff, and other members of the school community.

- A. All employees, contractors, visitors, and students shall wear face coverings at all times, including in classrooms, hallways, restrooms, on school transportation, and in other shared spaces.
- B. Employees and students must stay home if they are experiencing symptoms of COVID-19.
- C. Employees shall immediately self-report to their immediate supervisor if they:
 - 1. Test positive or are diagnosed with COVID-19;

2. Begin experiencing symptoms of COVID-19;
 3. Have close contact with a suspected or confirmed case of COVID-19; or
 4. Are otherwise required to self-quarantine or self-isolate pursuant to orders from the CDC or MDHHS or District policy.
- D. The District will encourage respiratory etiquette, including covering coughs and sneezes, frequent and thorough handwashing, and other recommendations found in the [MDHHS Guidelines for Operating Schools Safely](#).
- E. Employees are discouraged from using other workers' phones, desks, offices, or other work tools and equipment, when possible.
- F. In order to increase the physical distance among employees, the District will continue to evaluate exposure-reducing measures, such as the extent to which employees are able to work remotely and in staggered work shifts. Employees, students, and other individuals who are on district property should keep six feet (minimum of three feet in classrooms) from one another to the maximum extent possible.
- G. The District is also aware that some employees and students may be at higher risk for serious illness, such as older adults and those with chronic medical conditions and will continue to evaluate exposure-reducing measures.
- H. The District will continue to maintain routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment.
- I. The District will comply with applicable local orders issued by the County Health Department.

III. Self-Screening and Self-Reporting by Employees, Contractors, and Students

- A. Before or upon entering a District building or District property for the first time each day, each employee, contractor, parent, visitor, or member of the public must complete a self-screening questionnaire.
1. An employee who fails to complete the questionnaire, or who knowingly provides false answers to any of the questions, shall be subject to discipline, up to and including discharge.
 2. A parent, visitor, or member of the public who refuses to complete the questionnaire or who knowingly provides false answers to any of the questions shall be asked to leave. If the visitor refuses to comply with this request, subsequent District action may include calling local police to request their assistance in removing the visitor, charges under state law or local ordinance for trespassing, and/or banning the visitor from District property. See [MCL 750.552](#).

- B. The self-screening questionnaire will require the employee, contractor, parent, visitor, or member of the public to provide information regarding:
 - 1. Whether he or she has experienced any symptoms of COVID-19 within the past 24 hours; and
 - 2. Whether he or she has tested positive for COVID-19, or has been in close contact with anyone suspected or confirmed to have COVID-19, within the past 14 days.
- C. If an employee, contractor, parent, visitor, or other member of the public answers affirmatively to any of the inquiries on the self-screening questionnaire, he or she must leave District property if already on site and should return or remain at home. An employee or contractor shall also notify his or her immediate supervisor immediately if he or she has answered affirmatively to any of the questions in the self-screening protocol.
 - 1. A supervisor must immediately notify the Executive Director of Human Resources & Labor Relations if the supervisor is notified by an employee or contractor that the employee or contractor has answered affirmatively to any questions on the self-screening questionnaire.
 - 2. Return to work and reentry onto District property is governed by Section V of this policy.
- D. The building administrator shall monitor employees' responses on the screening questionnaire to ensure employees and contractors who answer affirmatively to any questions leave the premises, if applicable, and stay home in accordance with the procedures set forth in Section V.

IV. Response Plan for Confirmed Case of COVID-19

The District will take the following steps to address a confirmed infection in a District building or on District property.

- A. **Isolation.** If the individual is an employee or contractor on District property, the individual will be immediately isolated from others and arrangements made for the employee to go home or receive medical care (as applicable) immediately.
- B. **Notification.**

When an employee notifies the District that he or she has a confirmed case of COVID-19, the Superintendent shall:

- 1. Immediately notify the Monroe County Health Department; and
- 2. Within 24 hours, notify any co-workers, contractors, or suppliers who may have come into contact with the person with a known case of COVID-19.

- C. If the District learns a student, employee, contractor, visitor, or other member of the school community has tested positive for COVID-19, it will alert families by providing general communication about the positive case while protecting the identity of the individual who is infected.
- D. **Cleaning and Disinfecting.** Any areas used for prolonged periods of time by an individual with a confirmed case of COVID-19, or an individual suspected of having COVID-19 based on his or her symptoms, will be closed off, cleaned, and disinfected in accordance with [guidance from the CDC](#).
- E. **Return to Work.** If the individual with a confirmed diagnosis is a District employee or contractor, the individual may not return to work on-site or reenter District property except pursuant to Section V below.
- F. **Others with Close Contact.** District employees or contractors who were in close contact with the individual with a confirmed infection of COVID-19 will be sent home and prevented from entering District property except pursuant to Section V below.

V. Exclusion from District Property and Reentry

- A. The District will refer to guidance from the CDC, MDHHS, and the Monroe County Health Department to determine which employees, students, contractors, or visitors must be excluded from District property, and the required length of such quarantine. The following individuals *may* be excluded from District property: (1) individuals who have tested positive for COVID-19; (2) individuals who have symptoms of COVID-19; (3) individuals who have recently been in close contact with an individual confirmed or suspected to have COVID-19; and (4) individuals who have recently traveled.
- B. Once required to self-quarantine, employees and contractors may not return for in-person work, and students may not return for in-person learning or other in-person activities, until they have received permission to do so from the District. The District will grant such permission in accordance with the guidance currently available. Similarly, parents and other visitors who have been excluded from District property for reasons related to COVID-19 will not be permitted to reenter District property except in accordance with guidance currently available.
- C. An employee may be required to provide verification acceptable to the District of (1) the employee's need to self-quarantine; and/or (2) the employee's eligibility to return to work, given the current availability of tests and other relevant factors, and in accordance with current federal, state, and local laws and guidance.
- D. Any application or documentation requirements for an employee to be eligible for paid or unpaid leave under the law, District policy, or an applicable employment contract (i.e., the Family Medical Leave Act, Michigan Paid Leave Act, or paid sick leave under an individual contract or collective bargaining agreement) remain in effect.
- E. An employee required to self-quarantine but capable of performing work may be required to work remotely.

VI. Remote Work

Pursuant to MIOSHA Emergency Rule 5(8), the District prohibits in-person work for employees to the extent that their work activities can feasibly be completed remotely.

A. If the District is providing in-person instruction to students, then the District has determined that the following employees cannot feasibly complete their work activities remotely:

1. Administrators;
2. Directors;
3. Teachers and other professional staff;
4. Paraprofessionals;
5. Lunch monitors;
6. Crossing guards;
7. Secretaries;
8. Daycare employees;
9. School nurses;
10. Food service employees;
11. Custodians and maintenance employees; and
12. Bus drivers and transportation employees.

B. If the District is not providing in-person instruction to students, the Superintendent and/or Executive Director of Human Resources & Labor Relations shall determine which employee groups or individual employees can feasibly complete their work activities remotely, with consideration given to the following factors:

1. The employee's job duties and the extent to which they can be performed remotely;
2. The employee's access to necessary technology while at home;
3. The employee's need to collaborate, communicate, and interact with other employees to perform his or her duties and the extent to which this can occur virtually or by telephone;
4. The employee's need to communicate and interact in-person with parents, vendors, and others;

5. Any applicable terms in the collective bargaining agreement if one applies;
 6. The employee's need to access information and resources only available on-site in order to perform his or her job duties; and
 7. Any other relevant factors.
- C. The Superintendent and/or Executive Director of Human Resources & Labor Relations has the discretion to require an employee or employee group for in-person work upon determining they cannot perform their work remotely, even after initially determining that the employee or employee group is able to perform their work activities remotely.
- D. If the District is providing in-person instruction for some students and not others, then the Superintendent and/or Executive Director of Human Resources & Labor Relations shall identify which employees must report for work in person and which employees can feasibly perform their work duties remotely.

VII. Exposure Risk Classifications

The District has evaluated the routine and reasonably anticipated tasks and procedures of its employees to determine whether there is actual or reasonably anticipated employee exposure to COVID-19. Based on those evaluations, the District has made the determinations below with respect to its employees' exposure risks. Given those risks, the District is taking the steps set forth in Section II, above, and consistent with [MIOSHA Emergency Rules 5, 6, 7 and 8](#), to reduce exposure to COVID-19.

Risk Category	Employee Tasks and Procedures
<p>Lower Exposure Risk</p> <p>These job tasks and procedures 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. See MIOSHA COVID-19 Emergency Rule 3(2)(a).</p>	<p>The routine and reasonably anticipated tasks and procedures of the following District employees are categorized as lower exposure risk:</p> <ul style="list-style-type: none"> • Any employee working remotely; and • Employees who have <i>minimal</i> contact with the public and other coworkers. This may include, but is not limited to: <ul style="list-style-type: none"> ○ Certain secretaries and support staff; ○ Certain custodians or maintenance staff; and ○ Teachers, administrators, paraprofessionals, aides, support staff, and similar employees when the District is providing instruction to students remotely.
<p>Medium Exposure Risk</p> <p>These job tasks and procedures include those requiring frequent or close contact (e.g., within 6 feet) with people who may be infected with</p>	<p>The routine and reasonably anticipated tasks and procedures of all District employees not listed above are categorized as medium exposure risk. This includes the following categories of employees:</p>

Risk Category	Employee Tasks and Procedures
<p>SARS-CoV-2, but who are not known or suspected COVID-19 patients. . . . 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, high-volume retail settings). See MIOSHA COVID-19 Emergency Rule 3(2)(b).</p>	<ul style="list-style-type: none"> • The following employees when the District is providing in-person instruction to students: <ul style="list-style-type: none"> ○ Teachers; ○ Administrators; ○ Paraprofessionals and aides; ○ Bus drivers and other transportation employees; ○ Food service employees; ○ Secretaries and support staff; ○ Custodians and maintenance employees; and ○ Other employees who have more than minimal contact with coworkers, students, the general public, or others as part of their job duties. • Employees who have more than minimal contact with the students, coworkers, the general public, or others as part of their job duties, even when the District provides instruction to students remotely; this may include food service employees.
<p>High Exposure Risk</p> <p>These job tasks and procedures are those with high potential for exposure to known or suspected sources of COVID19. Workers in this category could include licensed health care professionals, medical first responders, nursing home employees, law enforcement, correctional officers, or mortuary workers. See MIOSHA COVID-19 Emergency Rule 3(2)(c).</p>	<p>Not applicable</p>
<p>Very High Exposure Risk</p> <p>These 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 include, e.g., healthcare workers performing aerosol-generating procedures (like intubation) on known or suspected COVID-19 patients. See MIOSHA COVID-19 Emergency Rule 3(2)(d).</p>	<p>Not applicable</p>

VIII. Employee Rights and Confidentiality

- A. An employee shall not be discharged, disciplined, or otherwise retaliated against for staying at home because he or she has COVID-19, has symptoms of COVID-19, or has had close contact with an individual with COVID-19.
 - 1. An employee who is allowed to return after the periods described above in Section V but declines to do so may be subject to discipline, up to and including discharge.
- B. The District will take reasonable precautions to protect health information pursuant to all applicable laws and statutes, including, but not limited to, the Americans with Disabilities Act (ADA), the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Family Education Rights and Privacy Act of 1974 (FERPA).

IX. Record-Keeping

The Superintendent and/or his designee shall ensure compliance with the record-keeping requirements of MIOSHA Emergency Rule 11 by:

- A. Maintaining records of training performed pursuant to Section IV(B)(3), including the topics covered, a list of participants, copies of any materials used, the identity of the trainer, and any other information deemed relevant.
- B. Maintaining copies, whether digitally or in hard copy, of the self-screening questionnaires completed daily by employees and contractors. These questionnaires shall be maintained in a confidential paper and/or digital file, with access restricted.
- C. Maintaining a copy of the notices provided to the Monroe County Health Department and to District employees and contractors working in the building or area visited by an employee who has been identified with a confirmed case of COVID-19. Notices sent to the Monroe County Health Department shall be maintained in a separate, confidential file with access restricted.

Expiration

This policy and the requirements under this policy shall remain in effect for as long as required by the MIOSHA Emergency Rules or other law or order, or so long as this policy and its requirements are determined necessary for the health and safety of students, employees, and visitors.

Legal

MIOSHA [COVID-19 Emergency Rules](#) (10/14/2020)

[Michigan Department of Health and Human Services \(“MDHHS”\) Orders](#)

Occupational Health and Safety Administration Guidance on Preparing Workplaces for COVID-19

[COVID-19 Guidance](#) from the Centers for Disease Control and Prevention (“CDC”)

[COVID-19 Guidance](#) from the Michigan Department of Health and Human Services

MDHHS [Guidelines for Operating Schools Safely](#)