

Amended COVID-19 Preparedness & Response Plan for Van Buren County Road Commission

General

The following COVID-19 preparedness & response plan has been established for Van Buren County Road Commission (VBCRC) 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 virus that causes COVID-19).

The Emergency Rules have general safeguards applicable for all workplaces and specific safeguards for certain industries. The Safety Coordinator has read these emergency rules carefully, developed the safeguards appropriate to VBCRC based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

VBCRC has designated one or more worksite supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The worksite supervisors are:

- Finance & Human Resources Director, Linnea Rader
- Roadside Group Leader, Jeff Daughtry
- Drainage Group Leader, Johnny Chancellor
- Surface Group Leader, Christopher Serdel
- Buildings & Maintenance Group Leader, Robert Drake

At least one of these supervisors will remain on-site at all times when employees are present on site. An on-site employee may be designated to perform the supervisory role.

The plan will be made readily available to our employees via hard copy and in an electronic version sent via the Remind Application.

Exposure Determination

VBCRC 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 Safety Coordinator was responsible for the exposure determination.

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

- **Lower Exposure Risk Jobs.** These jobs do not require contact with known or suspected cases of COVID-19 nor frequent close contact (for example, within six feet) with the general public. Workers in this category have minimal occupational contact with the public and other coworkers. Examples are small offices, small manufacturing plants (less than 10 employees),

small construction operations (less than 10 employees), and low-volume retail establishments, provided employees have infrequent close contact with coworkers and the public.

- **Medium Exposure Risk Jobs.** These jobs are those that require frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients. Examples are most jobs at manufacturing plants, construction sites, schools, high-volume retail settings, and other high-population-density work environments.

The Safety Coordinator verifies that VBCRC has no high-risk exposure jobs. High exposure risk jobs have high potential for exposure to known and suspected cases of COVID-19.

VBCRC has categorized its jobs as follows:

Job/Task	Exposure Risk Determination (Lower or Medium)	Qualifying Factors (Ex. No Public Contact, Public Contact)
Accounting/Receptionist Staff	Low	Minimal Public Contact
Engineering/Permit Staff	Low	Minimal Public Contact, Usually Outdoors, Masked
Mechanic Staff	Low	Minimal Public Contact
Road Maintenance Staff	Low	Minimal Public Contact, Usually Outdoors, Masked

Engineering Controls

VBCRC 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.

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. The Finance & Human Resources 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 VBCRC:

Job/Task	Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)
All Staff	Maintain at least six feet from everyone on the worksite.
All Staff	Use of signs to prompt employees to remain six feet from others.
All Administrative Staff	Promote remote work (telecommuting) to the fullest extent possible.
All Road Maintenance and Mechanic Staff	Promote flexible work hours (staggered shifts) to minimize the number of employees in the facility at one time.
All Administrative Staff	Restrict business-related travel for employees to essential travel only.
All Staff	Restrict face-to-face meetings. Communicate with others through phone, email, teleconferencing, and web conferencing.
All Staff	Restrict the number of visitors in the establishment at any given time.
All Staff	Provide employees with non-medical grade face coverings (cloth face coverings).
All Staff	Require employees to wear cloth face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.
All Administrative Staff	Require customers and the public to wear cloth face coverings.
All Administrative Staff	Keep visitors informed about symptoms of COVID-19 and ask sick visitors to stay at home until healthy again. Encourage sick visitors to use phone, email, or See.Click.Fix. to communicate road-related issues or complaints.
All Staff	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 Staff	Ensure that sick leave policies are flexible and consistent with public health guidance, so employees do not go to work sick.
All Staff	Do not require a healthcare provider's note for employees who are sick with acute respiratory illness to

	validate their illness.
All Staff	Maintain flexible policies that permit employees to stay home to care for a sick family member.
All Staff	Require all visitors complete COVID-19 health screening and contact information sheet

Hand Hygiene

The Safety Coordinator 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, VBCRC shall provide employees with antiseptic hand sanitizers or towelettes. VBCRC will provide time for employees to wash hands frequently and to use hand sanitizer.

VBCRC 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

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

All Group Leaders and the Safety Coordinator will be responsible for seeing that environmental surfaces (for example, table tops and door handles) 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, VBCRC will consult information on Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens. Products with EPA-approved emerging viral pathogens claims are expected to be effective against SARS-CoV-2 based on data for harder to kill viruses. The manufacturer's instructions for use of all cleaning and disinfection products will be strictly adhered to.

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

Surface	Method/Disinfectant Used	Schedule/Frequency
Desks, Tables, Counter-Tops, Work Benches	Re-Juv-Nal #816, 10 Minutes of Saturation or Q.T. Plus, 3 Minutes of Saturation	At Least Once Daily
Door Handles	Re-Juv-Nal #816, 10 Minutes of Saturation or Q.T. Plus, 3 Minutes of Saturation	At Least Once Daily
Phones, Keyboards, Mouse, other desk items	Re-Juv-Nal #816, 10 Minutes of Saturation or Q.T. Plus, 3 Minutes of Saturation	At Least Once Daily
Vehicle Door Handles, Steering Wheels, Radios	Q.T. Plus, 3 Minutes of Saturation	Upon Entry and Exit

VBCRC 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. The Finance & Human Resources Director will be responsible for seeing that this protocol is followed.

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

- **Employee's Disinfect All Areas, Tools, and Equipment Prior To and After Each Use**
- **Disinfectant Fogging Services provided by ServPro**

Personal Protective Equipment (PPE)

VBCRC will provide employees with the types of personal protective equipment 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.
- Properly removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, others, or the environment.

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

Health Surveillance

VBCRC will conduct a daily entry self-screening protocol for all employees entering the workplace, including a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19, and a temperature screening. All Group Leaders and the Safety Coordinator will be responsible for ensuring that all required health surveillance provisions are performed.

As workers enter the place of employment at the start of each work shift, VBCRC will have employees self-screen for COVID-19. VBCRC 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. A thermometer will be used for temperature screening of employees. VBCRC 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 Linnea Rader, Finance & Human Resources Director. VBCRC has provided employees with instructions for how to make such a report to the employer.

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

- 1. Call Linnea Rader at (269) 621-5282**
- 2. AND FOLLOW CALL-IN PROCEDURES AS DETAILED IN THE AGREEMENT**

VBCRC will physically isolate any employees with known or suspected COVID-19 from the remainder of the workforce, using measures such as, but are not limited to:

- Not allowing known or suspected cases to report to or remain at their work location.
- Sending known or suspected cases to a location where they are self-isolating during their illness.
- Assigning known or suspected cases to work alone at the location where they are self-isolating during their illness.

VBCRC 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 Finance & Human Resources Director 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, VBCRC will not reveal the name or identity of the confirmed case.

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

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

Recordkeeping

VBCRC will maintain records of the following requirements:

- Training. The employer shall maintain a record of all COVID-19 employee training.
- Screening protocols. The employer shall maintain a record of screening for each employee

or visitor entering the workplace.

■ When an employee is identified with a confirmed case of COVID-19, record when the local public health department was notified as well as any co-workers, contractors, or suppliers who may have come into contact with the person who was the confirmed case of COVID-19.

The Safety Coordinator will ensure that the records are kept.

In-Person Work Determination

VBCRC has put forth great effort to allow for many administrative staff to work from home, in coordination with the MIOSHA Emergency Rules. A Policy regarding remote work has been put in place prohibiting many aspects of in-person work in the office. All staff responsibilities and tasks have been reviewed and Appendix A contains a list of those tasks that currently necessitate in-person work at the VBCRC office.

Amended 12/22/2020

Department or Position	Task or Responsibility	Justification for the Necessity of In-Person Work
Accounting & HR	Proper storage of completed documents and files	The large number of files and documents house in the office cannot be digitized in a short amount of time and, thus, staff members completing this paperwork must return the paper versions to their proper storage location.
Various Administrative Staff Members	Scanner, Copier, Fax Use	While those staff members who have continual need for a scanner/printer/copier have been provided with this equipment at home, not all staff regularly use this, and it is necessary to visit the office when scanning or copying functions are needed. No one can fax from home.
Accounting & HR	Signatures	Various documents (letters, checks, project sheets, correspondence, etc.) are still mailed in hard copy and need signatures from management before being completed.
Accounting & HR	Acquisition of needed files and documents	The large amount of files and documents house in the office cannot be digitized in a short amount of time and, thus, staff members working with this paperwork must visit the office, get these files and documents, and transport them home for remote work.
All Administrative Staff Members	Inboxes	Documents and mail are being placed in various inboxes from other in-person necessary tasks and there is no process in place to digitize this information. These documents must be reviewed, and appropriate action taken to ensure smooth operations at the Road Commission.
Various Administrative Staff Members	Retrieving, Distributing the Mail from the Post Office	Administrative staff members completing work in the office are working together to ensure the mail is retrieved daily. There is one key to the post office box, housed at the office, and the mail must be distributed to the appropriate staff members.
Accounting & HR	Bill Payment	The process of paying bills has built-in checks and balances which are not digitized and require multiple staff members to authorize payment, print and sign checks, match checks with remittance information, and place in the mail.
Accounting & HR	Bond Payments	These payments are received in the mail and must be dropped off to the County Treasurer's Office upon receipt by the Road Commission.
Accounting & HR	Various Tax Payments	The process of paying various taxes has built-in checks and balances and requires the collaboration of multiple staff members.

Accounting & HR	Township and City/Village Billing	The process of invoicing various Townships, Cities, and Villages for programmed activities from the Road Commission requires the collaboration of multiple staff members and the necessary information is not digitized.
Accounting & HR	Digitizing Paper Files	Files are being scanned and organized digitally to allow further remote work.
Accounting & HR	Payroll Processing	Bi-weekly payroll processing often requires the use of multiple binders/files of information housed in the office. To ensure accurate pay and provide security of this information, payroll is currently processed in the office.
Accounting & HR	Sick and Vacation Leave Requests	Processing of these slips is done remotely, however, they must be collected from an inbox prior to processing and filed appropriately (with employee and management notification) when completed.
Accounting & HR	New Staff Training	The orientation process for new hires is multi-step and requires numerous face-to-face meetings with Administrative Staff over a designated period of time. Key cards must also be programmed in-person for new staff.
Accounting & HR	Office Supplies	To allow remote staff adequate in-home office supplies these orders must be placed and, once received, put in their designation location. Larger items such as printers have been shipped to personal residences; however, smaller items such as file folders, writing utensils, and the like are taken home from the office by staff members.
Accounting & HR	Road Crew Forms	Various forms and documents must be duplicated and distributed for daily use by the road crew.
Accounting & HR, Engineering Department	Processing Permits	Various channels exist for permit submittal including the fax machine. These permits must be picked up in the office and the process of issuing permits often requires the collaboration of numerous staff members.
Select Administration Staff	Vehicle Fuel, Maintenance	Those staff members with assigned Road Commission vehicles must be present at the facility for fuel and maintenance needs for these vehicles.
Engineering Department	Inspections	Various members of the Engineering Department are involved with on-site inspections requiring equipment to be picked up from the office. Documents relating to these inspections and projects are housed in the office and are not available in digital format.

Engineering Department	Plotter Use	It is necessary to print large-scale maps and blueprints from Permit submissions on the plotter and this piece of equipment cannot be accessed remotely.
Managing Director	Oversight	With many Administrative Staff members working remotely it is necessary to have the Managing Director in-office to coordinate any staffing issues that may arise as well as provide oversight of Road Commission operations.
Various Administrative Staff Members	COVID Coordination	Various staff members are responsible for different aspects of the Road Commission's COVID Procedure and, as such, must be on-site for these tasks.
Various Administrative Staff Members	Damage and Injury Reports	These reports are not digital and, as such, must be retrieved from the Safety Coordinator's inbox and processed accordingly (including, but not limited to communication with the involved staff, workers' compensation claim filing, etc.).
Fleet Superintendent	Oversight of Staff	Mechanic crews are essential and continue working a regular schedule, thus requiring a Supervisor on-site.