

COVID-19 WORKPLACE PREPAREDNESS AND RESPONSE PLAN

In accordance with State of Michigan requirements, **Huron Academy** (“Academy”) institutes this COVID-19 Workplace Preparedness and Response Plan (“Plan”).

The Academy aims to protect its workforce by enacting all appropriate prevention efforts. The Academy is continually monitoring guidance from local, state, and federal health officials and implementing workplace and Plan modifications where appropriate. The Academy will provide any communication and training materials on COVID-19 in the languages that are common to its employee population.

Staff members with questions about this plan are encouraged to contact the School Leader via phone at (586) 690-8180 and/or email at talbotm@huronacademy.org or sobczakj@huronacademy.org.

The Academy designates the following COVID 19 Safety Coordinators to implement, monitor, and report on the COVID-19 control strategies required for the worksite: Mark Talbot, Paula Bremerkamp, and Joshua Sobczak. The Academy will designate additional individuals as needed. Additionally, the Academy expects that all supervisors will set a good example by following this plan. This includes practicing good personal hygiene and jobsite safety practices to prevent the spread of the virus. Supervisors must encourage this same behavior from all staff members.

This Plan is maintained and posted on the Partner Solutions Employee Portal.

The Academy will consider any other social distancing practices, mitigation measures and guidelines recommended by the Centers for Disease Control and Prevention (CDC), Occupational Health and Safety Administration (OSHA), Michigan Occupational Health and Safety Administration (MIOSHA), Michigan Department of Health and Human Services (MDHHS), and other administrative agencies.

- Interim Guidance for Administrators of US K-12 Schools and Child Care Programs found at <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/guidance-for-schools.html>
- For Academies offering food distribution, the Academy will follow Michigan Department of Education guidance found at https://www.michigan.gov/mde/0,4615,7-140-66254_34491_96106-523138--,00.html

Additionally, the Academy will also comply with any and all applicable local county health orders and applicable State and Federal law.

Definitions: Throughout this document, the “principal symptoms of COVID-19” means at least 1 of fever, uncontrolled cough, or a typical new onset of shortness of breath, or at least 2 of the following not explained by a known physical condition: loss of taste or smell, muscle aches, sore throat, severe headache, diarrhea, vomiting, or abdominal pain. “Fever” is defined as 100.4 degrees Fahrenheit or more. “Close contact” means being within six feet of an individual for a total of fifteen minutes or more over a 24 hour period. If the COVID-19 positive person had symptoms, the contact time would start 2 days (48 hours) before they developed symptoms. If the person did not have symptoms, the contact time would start 2 days (48 hours) before the date the positive COVID-19 test was taken. “Gathering” means any occurrence, either indoor or outdoor where two or more persons from more than one household are present in a shared space. “Household” means a group of persons living together in a shared dwelling with common kitchen or bathroom facilities. In dwellings with shared or kitchen bathroom facilities occupied by 20 or more unrelated persons, households are defined by individuals who share a bedroom. “Face mask” means a tightly woven cloth or other multilayer absorbent material that closely covers an individual’s mouth and nose.

1. Prevention Efforts and Workplace Controls

a. Cleanliness and Social Distancing

During this Pandemic, staff members who are able to perform their essential duties remotely may be permitted to work from home in accordance with approved telework arrangements.

The Academy abides by the recommended social distancing and other safety measures and establishes the following:

- **Gatherings:** Gatherings are only allowed if in alignment with local requirements (following all gathering limits and facial covering requirements). Indoor and outdoor gathering limitations will be determined by the Michigan Department of Health and Human Services Epidemic Orders. Currently, limited attendance for indoor gatherings are not prohibited at non-residential venues, except for a small number of specific exemptions. All outdoor gatherings are permitted only as follows: (a) 25 or fewer persons are gathered at a venue without fixed seating, and attendance is limited to 20 persons per 1,000 square feet, including within any distinct area within the event space; (b) 25 or fewer persons are gathered at a venue with fixed seating, and attendance is limited to 20% of seating capacity of the venue. Incidental, temporary gatherings of persons in a shared space such as an airport, exercise facility, food service establishment, shopping mall, or public pool are not included in these limitations.

The limitations to gatherings do not apply to education and support services at schools serving students in pre-kindergarten through grade 12 or persons traveling on a school bus. Gatherings at schools for the purpose of conducting in-person instruction of pupils in pre-kindergarten through grade 12 are subject to local health department and school district decisions on remote learning. Gatherings for the purpose of sports and extracurricular activity are prohibited. Gatherings are permitted in the school cafeteria. If people are seated at tables, they must be 6 feet apart, or members of a household may share a table and tables must be spaced minimum of 6 feet apart.

Gatherings at schools are permitted for the purpose of providing services to students in need, including food distribution, access to internet connectivity, physical and mental health care services, and child care.

Face mask requirement at gatherings:

- a. All persons participating in gatherings are required to wear a face mask.
- b. As a condition of gathering for the purpose of transportation, transportation providers must require all staff and patrons to use face masks, and must enforce physical distancing among all patrons to the extent feasible.
- c. The Academy prohibits gatherings of any kind unless individuals in such gatherings (including employees) wear a face mask, and denies entry or service to all persons refusing to wear face masks while gathered.
- d. For child care, gatherings are not allowed unless face masks are worn by all staff. Children must wear face masks as indicated below:
 - i. All children 2 years and older when on a school bus or other transportation provided by the child-care organization;
 - ii. All children 4 years and older when in indoor hallways and indoor common areas;
 - iii. All children 5 years and older when in classrooms or any indoor settings

All gatherings must also include 6 feet of social distance between households.

Workplace gatherings are prohibited under the following circumstances: it is not necessary to perform job duties; employees not wearing face coverings cannot maintain 6 feet of distance from others; employees not wearing face coverings occupy the same shared space; if they include any person who is experiencing COVID-19 symptoms or who is subject to a CDC recommendation to isolate or quarantine.

Additional requirements:

- Staff meetings are completed remotely or in accordance with current health guidance;
- Staff members are encouraged to maintain physical distance even when on break, as well as before and after working hours;
- Staff members' work stations are no fewer than six feet apart whenever possible;
- The Academy may utilize flexible work hours, wherever possible, to limit the number of staff members simultaneously working on-site;
- Staff members' interactions with the general public and delivery personnel are modified to allow for social distancing and additional physical space between parties; and
- Non-essential travel is postponed or cancelled.

The Academy provides staff members with, at a minimum, non-medical grade face coverings.

In addition, the Academy is instituting the following cleanliness measures:

- Where possible, increasing ventilation rates and circulation throughout work sites;
- Performing routine environmental cleaning and disinfection, especially of shared spaces; and
- Where available, providing hand sanitizer in high-traffic areas.

Staff members are expected to minimize COVID-19 exposure by:

- Staying home if you are sick;
- Complying with the Academy's site entry procedure;
- Complying with the posters, signs and floor markers about health precautions;
- Cleaning work stations regularly;
- Staying 6 feet apart whenever possible;
- Avoiding, when possible, the use of other staff members' phones, desks, offices, or other work tools and equipment;
- Washing hands frequently with soap and water for at least 20 seconds;
- Discontinuing the use of hand dryers;
- Utilizing alcohol-based hand sanitizer containing at least 70% alcohol when soap and water are unavailable;
- Avoiding touching their faces with unwashed hands;
- Avoiding handshakes or other physical contact;
- Avoiding close contact with sick people;
- Practicing respiratory etiquette, including covering coughs and sneezes;
- Immediately reporting unsafe or unsanitary conditions on the Academy premises;
- Seeking medical attention and/or following medical advice if experiencing COVID-19 symptoms;
- Complying with self-isolation or quarantine orders and
- Utilizing personal protective equipment and hand sanitizer on public transportation.

Staff are trained on the information contained within this plan and any other requirements as established by applicable law. Non-compliance with this plan and COVID-19 procedures may result in discipline up to and including termination.

b. Supplemental Measures Upon Notification of Staff member's COVID-19 Diagnosis and/or Symptoms

A staff member with a COVID-19 diagnosis or who displays symptoms consistent with COVID-19 must be immediately removed from the worksite. Staff members with the principal symptoms should be tested for COVID-19 within 24 hours and must make reasonable efforts to schedule a test within three days. The test result should be sent to Human Resources.

In response to a confirmed or presumed diagnosis of COVID-19 symptoms, the Academy:

- Informs all staff members and visitors who may have come into contact with the diagnosed staff member in the 48 hours preceding the onset of symptoms of a potential exposure;
- Keeps confidential the identity of the diagnosed staff member unless permission has been given by that staff member;
- Implements its response plan; and
- Conducts cleaning and disinfecting protocols, including shutting down appropriate areas of the premises, increasing ventilation, and conducting a deep cleaning of the diagnosed staff member’s workstation and those shared spaces potentially infected by the staff member.

All staff members who worked in sustained, close proximity to the diagnosed staff member (i.e., those staff members who worked within six feet of the diagnosed individual for at least fifteen minutes) in the 48-hour timeframe prior to the principal symptoms of COVID-19 are also removed from the worksite for at least fourteen (14) days however, should these exposed staff members later develop the principal symptoms of COVID-19 and/or receive a confirmed diagnosis, they may not report on-site until all return-to-work requirements are met, defined below.

A log of diagnosed/symptomatic employees will be maintained confidentially. Within 24 hours of a confirmed COVID-19 diagnosis, the local public health department will be notified. In addition, documentation related to exposure notifications will be maintained. Upon request, the Academy must provide names and phone numbers of individuals with possible COVID-19 exposure to the MDHHS and local health departments to aid in contact tracing and case investigation efforts. Data collected under this section:

1. Must not be sold, or used for sales or marketing purposes without the express consent of each person;
2. Must be protected as confidential information to the fullest extent of the law;
3. Must not be provided to law enforcement or immigration officials except upon receipt of a lawful subpoena from a court or other lawful court order;
4. Must be retained by the Academy for 28 days, after which time the data must be destroyed. If using existing data to fulfill this requirement, the Academy may instead follow their own pre-existing data retention and destruction policies at the conclusion of the 28-day retention period.

The Academy notifies their HR Manager to determine if an OSHA Form 300, as well as a Form 301, “if it is more likely than not that a factor or exposure in the workplace caused or contributed to the illness” needs to be completed. If a staff member infects a coworker, the coworker has suffered a work-related illness if one of the recording criteria (e.g., medical treatment or days away from work) is met.

c. Worker Exposure Classification

Staff members’ “worker exposure” is classified as medium risk by the Occupational Safety and Health Administration’s (OSHA) guidance because the work they perform requires frequent and/or close contact with people known or suspected to be infected with COVID-19 or frequent contact with the public.

Given this classification, the Academy provides the following controls in addition to the above summarized prevention installing physical barriers where feasible, limiting exposure to the general public, and minimizing face-to-face contact.

2. Identification and Isolation of Sick and/or Exposed Staff members

Risk and exposure determinations are made without regard to staff members’ protected characteristics, as defined by local, state, and federal law.

Any health-related information and documentation gathered from staff members are maintained confidentially and in compliance with state and federal law. Specifically, medical documentation is stored separate from staff members' personnel documentation.

a. Staff members' Self-Monitoring and Daily Screenings

The company will require and keep a record of all self-screening protocols for all staff members entering the worksite, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed cases of COVID-19. All staff must complete this self-screening protocol in the parking lot of the Academy prior to entering the worksite.

Staff members should **not** report to work on-site and should notify their Supervisor if they can answer yes to any of the questions below. Such staff members may only resume in-person work upon meeting all return-to-work requirements, defined below.

To prevent the spread of COVID-19 and reduce the potential risk of exposure, the Academy screens staff members and visitors on a daily basis at dedicated entry points. The Academy ensures that staff members and visitors utilize these entry points by barring entry via other egresses.

Staff members are asked the following questions before entering the worksite:

1. In the past 24 hours, have you experienced any of the principal symptoms of COVID-19?:
 - (a) Any one of the following not explained by a known medical or physical condition: fever (100.4 degrees F or more), an uncontrolled cough, or new onset of shortness of breath; or
 - (b) At least two of the following not explained by a known medical or physical condition: loss of taste or smell, muscle aches ("myalgia"), sore throat, severe headache, diarrhea, vomiting, abdominal pain.

If a touchless thermometer is available, temperature checks may be performed.

If the person answers "yes" to any of these symptoms and they are not due to an existing condition, then access is denied, and staff member is advised to self-isolate/self-quarantine at home. Staff member may only resume in-person work upon meeting all return-to-work requirements, defined below.

2. Have you tested positive in the past 14 days, or are currently awaiting the results of a COVID-19 test?

If yes, access is denied, and staff member is advised to self-isolate/self-quarantine at home. The Academy will contact the local health department and receive advice on next steps. Staff member may only resume in-person work upon meeting all return-to-work requirements, defined below.
3. Have you had close contact with someone that is confirmed positive for COVID-19 in the past 14 days (within 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24 hour period starting 2 days before illness onset (or for asymptomatic patients, 2 days prior to test specimen collection)?)

If yes, access is denied. The Academy will contact the local health department and receive advice on next steps. Staff member may only resume in-person work upon meeting all return-to-work requirements, defined below.

Visitors who reply "Yes" to any of the above questions are not permitted entrance.

Staff members who develop any of the principal symptoms of COVID-19 during their shift must immediately leave the site and report it to their supervisor.

b. Return-to-Work Requirements

Staff members who answered positive to question number 1 may return to work if the staff member is ill with mild symptoms that improved in a short period of time; that person has tested negative for COVID-19; and that person has received clearance from the local health department.

Staff members who test positive for COVID-19 may discontinue isolation and return to work upon achieving the following conditions:

- At least 10 days have passed since symptom onset or since they were swabbed for the test that yielded the positive result, whichever is later;
- At least 24 hours have passed since resolution of fever without the use of fever-reducing medications; **AND**
- Other symptoms have improved, **OR**
- The staff member has been advised by their health care provider that their isolation period is complete.

For patients with severe illness, duration of isolation for up to 20 days after symptom onset may be warranted. Consider consultation with infection control experts in these cases. For persons who never develop symptoms, isolation and other precautions can be discontinued 10 days after the date of their first positive COVID-19 test.

Staff member who exhibits the primary symptoms of COVID-19 but has not been tested may return upon achieving the following conditions:

- Employee receives a negative test result; **OR**
- At least 10 days have passed since symptom onset date or since a test was taken, whichever is later;
- At least 24 hours have passed since resolution of fever without the use of fever-reducing medications; **AND**
- Other symptoms have improved

Staff members who came into close contact with, or live with, an individual who has tested positive for COVID-19 may return to work after:

- 14 days have passed since the last date of close contact with the diagnosed/symptomatic individual; **OR**
- If approved by the Local Health department:
 - 10 days have passed since the date of last close contact; **OR**
 - 7 days have passed since last date of close contact **AND** staff member was tested at least 5 days after contact with a negative test result

If the staff member develops the principal symptoms while in quarantine, they must then revert to the 10 days past symptoms; 24 hours without fever without the use of fever-reducing medications; and other symptoms have improved requirements. It is important to note that the quarantine period does not begin until after the last date of close contact with the positive individual. For this reason it is critical for positive individuals to isolate from other household members. If they do not properly isolate, the close contact would be out of work during the 10 days of the positive household member's isolation time period, PLUS an additional 10-14 days of quarantine.

Staff members are typically required to submit a release to return to work from a healthcare provider; given the current stressors on the healthcare system, Academy may accept written statements from employees confirming all the factors supporting their release.

3. Workplace Flexibilities and Potential Benefits for Staff members Affected by COVID-19

Staff members may be eligible for paid and unpaid leaves of absence.

Staff members may be permitted to work from home in accordance with approved telework arrangements.

a. Leave Time

Staff members who require leave because of their own COVID-19 diagnosis/symptoms, or because they have had close contact or live with an individual with a COVID-19 diagnosis, may be eligible for unpaid leave ~~under Executive Orders~~ until permitted thereunder to return to work.

b. Unemployment Compensation Benefits

Under State legislation, and the Federal CARES Act, unemployment compensation benefits are expanded in terms of eligibility, amount, and duration.

Staff members who are unable to report to work for reasons related to COVID-19 are referred to Human Resources for information on unemployment compensation benefits. Such reasons include the following:

1. Being under self-isolation or self-quarantine in response to elevated risk from COVID-19 due to being immunocompromised;
2. Displaying at least one of the principal symptoms of COVID-19;
3. Having close contact in the last 14 days with a confirmed COVID-19 diagnosis;
4. Needing to care for someone with a confirmed COVID-19 diagnosis; and
5. Fulfilling a family care responsibility as a result of a government directive (e.g., caring for a child whose school or childcare provider is closed or otherwise unavailable due to COVID-19).

c. FMLA and ADA

Staff members may be entitled to unpaid leave under the Family and Medical Leave Act (“FMLA”) if their absence is related to their own serious health condition or that of a family member. COVID-19 may constitute a serious health condition where “complications arise.”

The Academy is also mindful of its obligations under the Americans with Disabilities Act (“ADA”). Specifically, if a staff member requests an accommodation because of a condition that may be complicated by COVID-19 (e.g., cystic fibrosis, emphysema, COPD), then the Academy engages in the interactive process to provide a reasonable accommodation. This may mean allowing the staff member to work remotely (if reasonable) or work an alternative schedule.

4. Plan Updates and Expiration

This Plan responds to the COVID-19 outbreak. As this pandemic progresses, the Academy will update this Plan and its corresponding processes.

This Plan will expire upon conclusion of its need, as determined by the Academy and in accordance with guidance from local, state, and federal health officials.

Remote Work Policy for Schools

In the interest of protecting employee health and safety, and proactively slowing the spread of the COVID-19 virus, the Academy has implemented an emergency remote work plan following MiOSHA Emergency Rules dated October 14,

REV. January 7, 2021

2020, stating “**the employer shall create a policy prohibiting in-person work for employees to the extent that their work activities can feasibly be completed remotely.**” MDHHS further clarified on November 15, 2020 that in-person work is only allowed when doing that work remotely is not possible.

To this end, all employees are expected to employ the practice of working at home, instead of working at the primary place of work (e.g. the school), unless otherwise specified below.

The Academy reserves the right to terminate or extend the emergency remote work plan at any time given the constantly evolving nature of the COVID-19 situation. Employee compensation, benefits, work status, and work responsibilities will not change because of the emergency remote work plan.

This coronavirus (COVID-19) company policy is subject to changes with the introduction of additional governmental guidelines. If so, we will update this plan with changes.

Emergency Remote Work Guiding Principles

In implementing emergency remote work, the Company has followed these principles:

- If the business needs to change, emergency remote work logistics may change
- The program will be transparent to all employees
- The program will be consistently applied to all eligible employees

Scope

This policy applies to all regular full-time and part-time employees at the Academy.

Elements

Core Business Hours: Unless otherwise specified, core business hours at the Academy are 7am-5pm. The standard work week is 40 hours. Standard working hours are defined per position.

Eligibility Criteria: Full-time/part-time employees whose work can be done, even partially, without a physical presence in the workplace.

Following the Authorizer and Academy Board approved Return To School plan, not all roles are feasible for remote work because they require active collaboration and support of the Academy’s plan for instruction and continued business operations. Additionally, they may require extensive use of onsite resources, hands-on service, or other business operations. The following roles may not be eligible for remote work due to the following necessary reasons:

Administrators, Teachers, & Support Staff: Students are attending school in a face to face model, to ensure components of return to school plan are being met, observation of teaching methods, collaboration, training, access to technology and files.

Office Staff: Answering Academy phones, addressing visitors and supporting student enrollment processes.

Bus Drivers: Bus Drivers and Bus Aides that need to transport students to and from the brick and mortar building and/or assist with food or supply deliveries.

Food Service: Providing food service to students either in brick and mortar building or through food distribution if students are in virtual settings.

Custodial: Cleaning and maintenance of Academy buildings.

As the Return to School plan shifts among the Phased plans, a continual reevaluation of which roles are eligible for remote work will be completed.

Employees are required to follow the Telework Policy located in the Employee Handbook while working remotely.