



# **COVID-19 Preparedness and Response Plan**

## **For Lower and Medium Exposure Risk Employees**

The Monroe County Road Commission (“MCRC”) is committed to keeping our employees, their families and the community safe and healthy. As we face this unprecedented challenge, we must remain vigilant in mitigating this outbreak. The MCRC is an essential critical infrastructure service. It is the goal of the MCRC to operate effectively, ensure that all essential services are continuously provided and that our employees are safe within the workplace. This COVID-19 Preparedness and Response Plan has been developed in accordance with MIOSHA Emergency Rules for Coronavirus disease 2019 (COVID-19), the OSHA Guidance on Preparing Workplaces for COVID-19 and the latest guidance from the US Centers for Disease Control and Prevention (CDC). The purpose of this plan is to minimize or eliminate employee exposure to COVID-19 and will be implemented throughout the entire organization in order to maintain a safe workplace and ensure the continuity of our operations during this pandemic.

This plan is based on information currently available from the CDC and MIOSHA at the time of development, and is subject to change based on further information provided by the CDC, MIOSHA and other public officials. The MCRC may amend this plan based on operational needs and subsequent state and local orders.

## **GENERAL INFORMATION ABOUT COVID-19**

### ***What is COVID-19?***

Coronavirus (COVID-19) is an illness caused by a virus that can spread from person to person. The virus that causes COVID-19 is a new coronavirus that has spread throughout the world with symptoms that can range from mild or no symptoms to severe illness.

### ***How is COVID-19 spread?***

According to the CDC website, you can become infected by coming into close contact (about 6 feet) with a person who has COVID-19. It is primarily spread from person to person. You can become infected from respiratory droplets when an infected person coughs, sneezes or talks. You may also be able to get it by touching a surface or object that has the virus on it and then by touching your mouth, nose or eyes.



## ***How to protect yourself and prevent the spread of COVID-19.***

There is currently no vaccine available to protect against COVID-19. The best way to protect yourself is to avoid being exposed to the virus. Stay at home as much as possible and wear a cloth face covering that covers your nose and mouth if you do have to be in public settings. Thoroughly clean and disinfect frequently touched surfaces and wash your hand often with soap and water or use alcohol based hand sanitizer. Practice social distancing by buying necessary items online, limit in-person contact as much as possible and keep a 6-foot distance from others when required. The CDC also recommends to stay home if you are sick (except to seek medical care) and avoid public transportation ride-sharing and taxis if possible. Everyone is at risk of getting COVID-19, however older adults and people of any age who have a serious underlying medical condition may be at higher risk.

## **GENERAL**

The Emergency Rules, OSHA guidance and CDC guidance for COVID-19 have general safeguards applicable for all workplaces and specific safeguards for certain industries. The management team has read these guidance documents carefully, found the safeguards appropriate to the MCRC based on its type of operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

As the COVID-19 situation evolves, [OSHA](#) and [CDC](#) guidance are periodically updated. The Human Resources Department will be responsible for visiting these guidance webpages regularly for the latest information and for revising the plan as necessary. This plan reflects CDC and MIOSHA guidance as of 10/22/2020.

The MCRC has designated two worksite supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The worksite supervisors are Camden Regis and David Leach. The supervisors will remain on-site at all times when employees are present on site. An on-site employee may be designated and trained to perform the supervisory role.

Management will regularly coordinate with state and local health officials to obtain timely and accurate information, and will disseminate that information, as well as required steps to be taken as recommended or required by any state or local laws. Management must be familiar with this plan and be ready to answer questions from employees. Management should follow



all guidelines put in place to prevent the spread of the virus and encourage the same from all employees.

The plan will be made readily available to employees and labor unions. Hard copies of the plan will be posted in all lunchrooms, conference rooms, and the office of the Human Resources Department.

## **DETERMINING EXPOSURE**

The MCRC 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 Human Resources Director was responsible for the exposure determination.

The MCRC 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 with the general public. Workers in this category have minimal occupational contact with the public and other coworkers.

**Medium Exposure Risk Jobs.** These jobs are those that require frequent or close contact with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients.

The Human Resources Director verifies that The MCRC has no high-risk exposure jobs. High exposure risk jobs have high potential for exposure to known and suspected cases of COVID-19, such as healthcare, medical transport, and correctional facilities.

The MCRC has categorized its jobs as follows:

**NOTE:** Some jobs may have more than one type of exposure risk depending on the task or qualifying factors.



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| Job/Task                                | Exposure Risk Determination | Qualifying Factors                             |
|---|-----------------------------|--|
| Truck Drivers/Heavy Equipment Operators | Lower                       | Little to no public contact                    |
| Maintenance Supervisors                 | Medium                      | Public Contact                                 |
| Specialty Crews                         | Medium                      | Close contact with co-workers                  |
| Mechanics                               | Medium                      | Close contact with co-workers                  |
| Purchasing Agent                        | Medium                      | Close contact with co-workers and vendors      |
| Customer Service Agent                  | Medium                      | Close contact with co-workers and vendors      |
| Engineers                               | Low/Medium                  | Public and co-worker Contact                   |
| Finance/Director                        | Low/Medium                  | Little to no public contact; co-worker contact |
| Managing Director                       | Medium                      | Public and co-worker Contact                   |
| HR Director                             | Medium                      | Public and co-worker Contact                   |
| Superintendent of Maintenance           | Medium                      | Public and co-worker Contact                   |
| Administrative Assistant                | Low/Medium                  | Little to no public contact; co-worker contact |



## ENGINEERING CONTROLS

The MCRC has implemented feasible engineering controls to minimize or eliminate employee exposure to COVID-19. 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. The Human Resources Director and Superintendent of Maintenance will be responsible for seeing that the correct engineering controls are chosen, installed, maintained for effectiveness, and serviced when necessary. The following engineering controls have been implemented:

| Job/Task                 | Engineering Control   |
|--------------------------|---|
| Maintenance Supervisors  | Continue with social distancing and wearing a mask                          |
| Specialty Crews          | Continue with social distancing and wearing a mask                          |
| Mechanics                | Continue with social distancing and wearing a mask                          |
| Purchasing Agent         | Install plastic barrier at window   |
| Customer Service Agent   | Install plastic barrier at window   |
| Engineers                | Permits – stand behind plastic barrier placed in front of computer in lobby |
| Managing Director        | Continue with social distancing and wearing a mask                          |
| HR Director              | Continue with social distancing and wearing a mask                          |
| Administrative Assistant | Continue with social distancing and wearing a mask                          |



|                               |   |
|-------------------------------|---|
|                               |   |
| Superintendent of Maintenance | Continue with social distancing and wearing a mask                        |
| General                       | Keep doors propped open during the day to decrease touching of door knobs |

## ADMINISTRATIVE CONTROLS

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

| Job/Task              | Administrative Control   |
|-----------------------|--|
| All employees         | Maintain at least six feet from everyone on the worksite, or when interacting with the public, or wear a mask  |
| Front Lobby           | Use ground markings and signs to prompt visitors to remain six feet from others.   |
| All employees         | Restrict business-related travel for employees to essential travel only.   |
| All Maintenance Crews | Minimize the sharing of tools, equipment, and vehicles. All equipment and tools should be wiped down with disinfecting wipes at the end of each shift. If feasible, each employee should use/drive the same truck or piece of equipment every shift. |



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| All employees | Whenever you use a room, wipe down tables, chairs, counters and door handles used with disinfectant spray or wipes.  |
| All employees | When using common areas/equipment, wipe the equipment used (copier, postage machine, etc.)   |
| All Employees | Provide employees with non-medical grade face coverings  |
| All employees | Restrict face-to-face meetings. Communicate with others through phone, email, teleconferencing, and web conferencing.  |
| All Employees | If a face-to-face meeting is unavoidable, minimize the meeting time and choose a large room (such as the board room) and sit at least 6 feet apart. Do not shake hands and wear your mask at all times |
| All Employees | Require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace, or when in public areas of any building.               |
| All employees | To limit movement between buildings, only managers and personnel with a regular workstation are to enter any buildings. Any employee with HR business may enter provided they are wearing a mask.      |
| Front Lobby   | There will be no public use of drinking fountains or restrooms.  |
| Front Lobby   | Require customers and the public to wear face coverings.   |
| Front Lobby   | Keep customers informed about symptoms of COVID-19 and ask sick customers to stay at home until healthy again. Encourage citizens to utilize FB, email, or phone.                                      |
| Front Lobby   | Provide customers and the public with tissues, hand sanitizer, masks and trash receptacles.  |



|               |  |
|---------------|--|
| All employees | Encourage proper cough and sneeze etiquette by employees, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands. |
| All employees | Employees have been given a stylus to use the KIOSK for clocking in and out. This is to be kept by the employee.   |
| All employees | Must wear a mask when riding two or more in a vehicle  |
| HR Department | Ensure that sick leave policies are flexible and consistent with public health guidance, so employees do not go to work sick.                                |
| HR Department | Maintain flexible policies that permit employees to stay home to care for a sick family member.  |

## HAND HYGIENE

The HR Director 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 COVID-19. When handwashing facilities are not available, The MCRC shall provide employees with antiseptic hand sanitizers or towelettes. The MCRC will provide time for employees to wash hands frequently and to use hand sanitizer.

To minimize the spread of COVID-19, employees are expected to cooperate in taking steps to reduce the transmission of the virus by following the guidelines put in place by the management team. The CDC recommends the following guidelines:

- Wash your hands often with soap and water for at least 20 seconds, especially after going to the bathroom; before eating; and after blowing your nose, coughing, or sneezing
- Use hand sanitizer if water is not available
- Avoid touching your face
- Covering your mouth whenever you sneeze or cough
- Maintain social distancing (6 feet apart)
- Cover your mouth and nose with a face cover





## DISINFECTION OF ENVIRONMENTAL SURFACES

The MCRC will increase facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces, paying special attention to parts, products, and shared equipment. The MCRC will make cleaning supplies available to employees upon entry and at the worksite.

The HR Director will be responsible for seeing that environmental surfaces in the workplace are cleaned and disinfected. Frequency of such disinfection will be determined in part by factors such as when and how often the environmental surfaces are potentially exposed to COVID-19. The manufacturer’s instructions for use of all cleaning and disinfection products will be strictly adhered to. When feasible, doors should be propped open to ensure limited amount of handling. Management will regularly meet and discuss the progress of the virus, the impacts on the MCRC, and our evolving response.

The MCRC 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 HR Director will be responsible for seeing that this protocol is followed.

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

| Surface                           | Method/Disinfectant Used | Schedule/Frequency |
|-----------------------------------|--------------------------|--------------------|
| Table tops/chairs in common areas | Disinfectant wipes/spray | After each use     |
| Copiers, postage machine          | Disinfectant wipes       | After each use     |
| Door knobs                        | Disinfectant wipes       | After each use     |
| All surfaces in all offices       | Disinfectant wipes       | Daily              |
| Bathroom Fixtures                 | Disinfectant wipes       | After each use     |
| All general surfaces              | Cleaning Company         | Three times/week   |



## **PERSONAL PROTECTIVE EQUIPMENT (PPE)**

The MCRC will provide employees with personal protective equipment for protection from COVID-19 appropriate to the exposure risk associated with the job. The PPE policy will follow the CDC and OSHA guidance applicable.

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.

The MCRC will provide non-medical grade face coverings to employees. The MCRC will require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.

## **HEALTH SURVEILLANCE**

The MCRC has implemented a screening protocol to identify known or suspected cases of COVID-19 among employees and isolate them from the remainder of the workforce. The HR Director 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, The MCRC will have employees self-screen for COVID-19. All employees will be required to complete a questionnaire covering the signs and symptoms of COVID-19 and their exposure to people with suspected or confirmed COVID-19. A no-touch thermometer will be used for temperature screening of employees

Employees have been directed to promptly report any signs and symptoms of COVID-19 to the HR Director before and during the work shift. The MCRC 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:

- If you are not at work and develop symptoms or come in close contact (less than six feet, for a total of 15 minutes in a 24-hour period) of someone who is symptomatic or is a confirmed case, please stay home and seek medical advice (Telehealth, urgent care, family doctor, etc.). Notify HR by the start of your next shift.
- If you are at work, notify your supervisor (preferably by phone), go to a place where you can temporarily isolate (ex. your car) and call HR for further instructions.

The MCRC will not allow known or suspected cases to report to or remain at their work location and will be sent home

The MCRC 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.

An employee should get tested if:

- They have symptoms of COVID-19
- They have had close contact (within 6 feet for a total of 15 minutes within a 24-hour period) with someone with confirmed COVID-19
- They have been asked or referred to get testing by their healthcare provider, local or state health department

If you come in contact with a confirmed case, you will be asked to quarantine for 14 days, or get tested. As critical infrastructure employees, you may return to work after a negative test, however you will need to wear a mask for 14 days from the last day you came in contact with a positive case. Continue to monitor for symptoms.

When an employee is identified with a confirmed case of COVID-19, The HR 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, the employee's name and identity will not be revealed.

The MCRC will allow employees with a confirmed case of COVID-19 to return to the workplace only after they are no longer infectious according to the latest guidelines from the CDC.



An employee may return to work when they have:

- had no fever for 24 hours without the use of medicine  
**AND**
- symptoms have improved (loss of taste and smell may persist for weeks or months after recovery and need not delay the end of isolation)  
**AND**
- at least 10 days have passed since your symptoms first appeared

\*\*All employees must procure a note from their doctor stating they are cleared to return to work. Any medical information obtained will be treated as a confidential medical record and disclosure will be limited to only those as required by law.

Employees should be aware of the symptoms of COVID-19. According to the CDC, those include:

- Cough
- Shortness of breath or difficulty breathing
- Fever (100.4 and above)
- Chills
- Muscle pain
- Sore throat
- New loss of taste or smell
- Nausea, vomiting or diarrhea

Additionally, employees should seek medical attention if the following occur:

- Trouble breathing
- Persistent pain or pressure in the chest
- New confusion
- Inability to wake up or stay awake
- Bluish lips or face

## **TRAINING**

The Human Resources Director shall coordinate COVID-19 training and ensure compliance with all training requirements.



The MCRC will training workers on, at a minimum:

- Workplace infection-control practices
- The proper use of personal protective equipment
- Steps the employee must take to notify the MCRC of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19
- How to report unsafe working conditions

The HR director shall create a record of the training. Records should include the name of the employees trained and the date of the training.

## RECORDKEEPING

The MCRC 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 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 HR Director will ensure that the records are kept.

### **\*\*NOTE: The CDC has redefined the definition of “close contact.”**

The CDC defines close contact as someone who was within 6 feet of an infected person for a cumulative total of 15 minutes or more over a 24-hour period\* starting from 2 days before illness onset (or, for asymptomatic patients, 2 days prior to test specimen collection) until the time the patient is isolated.

\* Individual exposures added together over a 24-hour period (e.g., three 5-minute exposures for a total of 15 minutes).

## OSHA RECORDKEEPING REQUIREMENTS

OSHA recordkeeping requirements at 29 CFR Part 1904 mandate covered employers record certain work-related injuries and illnesses on their OSHA 300 log. COVID-19 can be a recordable illness if a worker is infected as a result of performing their work-related duties. However, employers are only responsible for recording cases of COVID-19 if **ALL** of the following are true:

- 1) The case is a confirmed case of COVID-19
- 2) The case is work related (as defined by 29 CFR 1904.5)
- 3) The case involves one or more of the general recording criteria set forth in 29 CFR 1904.7 (i.e. medical treatment beyond first aid, days away from work)

Employers of workers in the healthcare industry, emergency response organizations (e.g., emergency medical, firefighting, and law enforcement services), and correctional institutions must continue to make work-relatedness determinations pursuant to 29 CFR § 1904. Until further notice, however, OSHA will not enforce 29 CFR § 1904 to require other employers to make the same work-relatedness determinations, except where:

1. There is objective evidence that a COVID-19 case may be work-related. This could include, for example, a number of cases developing among workers who work closely together without an alternative explanation; and
2. The evidence was reasonably available to the employer. Examples of reasonably available evidence include information given to the employer by employees, as well as information that an employer learns regarding its employees' health and safety in the ordinary course of managing its business and employees

OSHA feels this enforcement policy will help employers focus their response efforts on implementing good hygiene practices in their workplaces, and otherwise mitigating COVID-19's effects, rather than on making difficult work-relatedness decisions in circumstances where there is community transmission. As a result, the MCRC will not report positive COVID-19 case, however will keep track of those positive cases.