



Holly Academy Workplace COVID-19 Preparedness and Response Plan

For Lower and Medium Exposure Risk Employers

General

The following COVID-19 preparedness & response plan has been established for Holly Academy in accordance with the requirements in the [Executive Orders \(EOs\)](#) for COVID-19 signed by Governor Gretchen Whitmer, 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 SARS-CoV-2.

The EOs, OSHA guidance, and CDC guidance for COVID-19 have general safeguards applicable for all workplaces and specific safeguards for certain industries. Julie Kildee has read these guidance documents carefully, found the safeguards appropriate to Holly Academy based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

As the COVID-19 situation evolves, the EOs and CDC guidance are periodically updated. Julie Kildee will be responsible for visiting the EO webpage and CDC guidance webpage regularly (for example, weekly) for the latest information and for revising the plan as necessary. The EOs are found at: https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705---,00.html. The CDC guidance documents are found at: <https://www.cdc.gov/coronavirus/2019-ncov/communication/guidance-list.html?Sort=Date%3A%3Adesc>. This plan reflects the EOs and CDC guidance as of July 16, 2020.

Holly Academy has designated one or more worksite supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The worksite supervisor(s) are Jose Melero and Ken Kander. The supervisor 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 employees and labor unions. The plan will be made available via the school website.



Exposure Determination

Holly Academy 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. Julie Kildee was responsible for the exposure determination.

Holly Academy 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.

Julie Kildee verifies that Holly Academy has no high-risk exposure jobs. High exposure risk jobs have high potential for exposure to known and suspected cases of COVID-19. Examples are most jobs in healthcare, medical transport, nursing homes and residential care facilities, mortuaries, law enforcement, and correctional facilities. This plan is not intended for employers who have high exposure risk jobs.

Holly Academy has categorized its jobs as follows:

Job/Task	Exposure Risk Determination (Lower or Medium)	Qualifying Factors (For Example, No Public Contact, Public Contact)
Administrator	Medium	Public contact with individuals who may be infected with



		SARS-CoV-2, but who are not known or suspected COVID-19 patients.
Teacher	Medium	Public contact with individuals who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients.
Office staff	Medium	Public contact with individuals who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients.
Support staff (paraprofessionals, interventionists)	Medium	Public contact with individuals who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients.
Custodial	Medium	Public contact with individuals who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients.

Engineering Controls

Holly Academy 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. For medium exposure risk jobs, engineering controls can include:

- Installing physical barriers (such as clear plastic sneeze guards) between coworkers or between workers and customers.
- Installing a drive-through window for customer service.
- Increasing the amount of ventilation in the building.
- Increasing the amount of fresh outdoor air that is introduced into the building.

The Holly Academy administrative team will be responsible for seeing that the correct engineering controls are chosen, installed, maintained for effectiveness, and serviced when necessary.

Job/Task	Engineering Control
Teachers will keep classroom windows open, when feasible.	Increasing the amount of fresh outdoor air that is introduced into the school.
Custodial staff will install a plexiglass barrier between front office staff and guests.	Reducing the exposure to public contact with individuals who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients.
Students will be provided with plexiglass protective barriers.	Reduce exposure to students/teachers who may be infected with COVID-19, but who are not known or suspected COVID patients.



All Holly Academy students and staff will be provided with a facial covering.	Facial coverings significantly reduce the transmission of COVID-19.
The Facilities Director will ensure our HVAC systems are serviced prior to the start of the 20/21 school year.	Increasing the amount of ventilation in the school.
The Facilities Director has purchased hand-sanitizing stations to place throughout the school.	Hand washing is essential to reducing exposure to COVID-19.

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. Julie Kildee 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 Holly Academy:

Job/Task	Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)
All staff and students	As feasible, maintain at least six feet from everyone in the school.



All staff	Use ground markings, signs, and physical barriers to prompt staff and students to remain six feet from others.
All staff	All staff will be temperature checked daily and will be required to fill out a health screener prior to being allowed in the school.
All staff	No assemblies will take place involving more than one cohort of students.
All staff	No school-related travel will take place.
All staff	Limit face-to-face meetings beyond the scope of the classroom.
School-wide	Restrict the number of people in the school at any given time.
Staff and students	Minimize the sharing of supplies, equipment, and items.
Staff and students	Require staff and middle school students to wear cloth face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.
School-wide	Require the public to wear cloth face coverings.
School-wide	Keep families informed about symptoms of COVID-19 and



	ask sick students to stay at home until healthy again.
School-wide	Provide visitors with hand sanitizer, tissues, and trash receptacles.
Staff and students	Encourage proper cough and sneeze etiquette by staff and students, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands.
Staff	Ensure that sick leave policies are flexible and consistent with public health guidance, so staff do not go to work sick.
Staff	Do not require a healthcare provider's note for staff who are sick with acute respiratory illness to validate their illness.
Staff	Maintain flexible policies that permit staff members to stay home to care for a sick family member.

Hand Hygiene



The Facilities 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 SARS-CoV-2. When handwashing facilities are not available, Holly Academy shall provide employees with antiseptic hand sanitizers or towelettes. Holly Academy will provide time for employees to wash hands frequently and to use hand sanitizer.

Disinfection of Environmental Surfaces

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

The Holly Academy Facilities 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 SARS-CoV-2. When choosing cleaning chemicals, Holly Academy 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
Doors, benches, and restrooms	EPA approved disinfectant or diluted bleach solution	Minimally, every four hours
Library and computer labs	EPA approved disinfectant or diluted bleach solution	After every class period
Student and office	EPA approved disinfectant or	After every class period or



desks	diluted bleach solution	every two hours Student desks will be wiped down before and after meals
Playground structures	“Normal” cleaning solution	Once per week
Athletic equipment	EPA approved disinfectant or diluted bleach solution	After each use

Holly Academy 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 closed for 24 hours to minimize the risk of any airborne particles, and employees will be sent home or relocated. Julie Kildee, Holly Academy’s Director, will be responsible for seeing that this protocol is followed.

Holly Academy’s cleaning staff will wear a surgical mask, gloves, and a face shield when performing deep cleaning in the affected areas for enhanced cleaning and disinfection.

Personal Protective Equipment (PPE)

Holly Academy will provide employees with personal protective equipment for protection from SARS-CoV-2 appropriate to the exposure risk associated with the job. The PPE policy will follow the CDC and OSHA guidance applicable to the industry and types of jobs at the workplace, and it will be in accordance with latest EOs.

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.



Holly Academy will provide non-medical grade face coverings (cloth face coverings) to employees (cloth face coverings are technically not considered PPE). Holly Academy will require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace. Holly Academy 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 facial coverings
Custodial staff	Cloth facial covering and face shields
Staff members who cannot tolerate a cloth facial covering	Face shields

Health Surveillance

Holly Academy 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. Julie Kildee 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, Holly Academy will have employees self-screen for COVID-19. Holly Academy 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. When obtainable, a no-touch thermometer will be used for temperature screening of employees. Holly Academy 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 a member of administration or the office manager before and during the work shift. Holly Academy 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:

Staff who develop a fever or become ill with COVID-19 symptoms at school will wear a mask and be transported out of the building for possible COVID testing. Staff members will not return to school until no symptoms are present.

Holly Academy 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 (for example, home) 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.

Holly Academy 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, within 24 hours, the office manager will notify both the local public health department, and any co-workers, contractors, or suppliers who may have come into contact with the person who is the confirmed case of COVID-19. When notifying coworkers, contractors, and suppliers, Holly Academy will not reveal the name or identity of the confirmed case.

Holly Academy 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 Holly Academy administrative team and Facilities Director shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

Holly Academy will train workers on, at a minimum:

1. Routes by which the virus causing COVID-19 is transmitted from person to person.
2. Distance that the virus can travel in the air, as well as the time it remains viable in the air and on environmental surfaces.



3. Symptoms of COVID-19.
4. Workplace infection-control practices.
5. The proper use of PPE, including the steps for putting it on and taking it off.
6. Steps the worker must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
7. How to report unsafe working conditions.

The Director or Curriculum Director shall create a record of the training. The record will list the names of the employees trained, the training date, name of trainer, and content of training.

Recordkeeping

Holly Academy will maintain the following records as they relate to the COVID-19 preparedness and response plan:

1. Training records.
2. A record of daily entry self-screening results for all employees or contractors entering the workplace, including a questionnaire covering signs and symptoms of COVID-19 and exposure to people with suspected or confirmed COVID-19.
3. When an employee is identified with a confirmed case of COVID-19, a record that within 24 hours 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 Director will ensure that the records are kept.