

## **SARS-CoV-2 Preparedness & Response Plan for Low & Medium Risk Employees**

### **General**

The following SARS-CoV-2 Preparedness & Response Plan has been established for ACCESS TITLE AGENCY, LLC, in accordance with the requirements in the most recent Executive Order (EO) concerning employee safety and health, and all requirements therein signed by Governor Gretchen Whitmer, and also in accordance with Guidance on Preparing Workplaces for COVID-19 as referenced by EO. *Specific requirements for employers in various industry sectors are contained in the associated EO.*

This program must be available at the company or at the worksite. The purpose of this program is to minimize or eliminate employee exposure to SARS-CoV-2. A copy of this program shall be provided to employees upon their request. Refer to the EO and referenced Guidance on Preparing Workplaces for COVID-19 therein for specific requirements. **(NOTE: *This sample program is not appropriate for employees who are high risk or very high risk.*)**

### **Exposure Determination**

ACCESS TITLE AGENCY, LLC will evaluate 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. Karen Kohler will be responsible for seeing that exposure determination is performed.

An employer shall categorize all its employees' jobs into the following risk categories:

***Lower exposure risk jobs.*** These jobs are those that do not require contact with people known to be, or suspected of being, infected with SARS-CoV-2 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.

***Medium exposure risk jobs.*** These jobs include those that require frequent and/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. In areas without ongoing community transmission, workers in this risk group may have frequent contact with travelers who may return from locations with widespread SARS-CoV-2 transmission. In areas where there is ongoing community transmission, workers in this category may have contact with the general public and coworkers (for example, schools, high-population-density work environments, high-volume retail settings).

ACCESS TITLE AGENCY has determined that the following positions/jobs/tasks have been determined to have the following exposure determination(s).

(NOTE: Some employers may have more than one type of exposure determination in the workplace depending on the evaluation of each positions/jobs/tasks in the workplace. Likewise, employees may perform tasks that have differing exposure determinations depending on assignment or need.)

Positions/job/task	Determination	Qualifying Factors (i.e. no public contact, public contact, job task description)
Closer	Medium	Some public contact
Administrative	Medium	Some public contact

### Engineering controls

ACCESS TITLE AGENCY, LLC has implemented feasible engineering controls to prevent employee exposure to SARS-CoV-2. Engineering controls involve isolating employees from work-related hazards. 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.

Engineering controls for SARS-CoV-2 include:

- Installing physical barriers, such as clear plastic sneeze guards.
- Installing a drive-through window for customer service.

NOTE: Additional engineering controls are not recommended for low exposure risk employees.

Karen Kohler will be responsible for seeing that the correct engineering controls are chosen, installed and maintained and serviced for effectiveness as often as required.

The following engineering controls have been implemented. (Example: specify the engineering control for each of the positions/job/task listed in the exposure determination, and how each engineering control is intended to function to prevent the spread of SARS-CoV-2.)

Positions/job/task	Engineering Control
Front Desks	Plastic Sneeze Guards

## Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. Melissa Schaub and Brandi Wolf will be responsible for seeing that the correct administrative controls are chosen, implemented and maintained effectiveness in order to minimize or eliminate employee exposure to SARS-CoV-2.

Additional engineering controls are not recommended for workers in the lower exposure risk group. Low exposure risk group employers should monitor public health communications about COVID-19 recommendations and ensure that workers have access to that information. Frequently check the CDC COVID-19 website: [www.cdc.gov/coronavirus/2019-ncov](http://www.cdc.gov/coronavirus/2019-ncov).

Examples of administrative controls for SARS-CoV-2 in medium risk groups include:

- Consider offering face masks to ill employees and customers to contain respiratory secretions until they are able leave the workplace (i.e., for medical evaluation/care or to return home). In the event of a shortage of masks, a reusable face shield that can be decontaminated may be an acceptable method of protecting against droplet transmission. See CDC/NIOSH guidance for optimizing respirator supplies, which discusses the use of surgical masks, at: [www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy](http://www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy).
- Keep customers informed about symptoms of COVID-19 and ask sick customers to minimize contact with workers until healthy again, such as by posting signs about COVID-19 in stores where sick customers may visit (e.g., pharmacies) or including COVID-19 information in automated messages sent when prescriptions are ready for pick up.
- Where appropriate, limit customers' and the public's access to the worksite, or restrict access to only certain workplace areas.
- Consider strategies to minimize face-to-face contact (e.g., drive-through windows, phone-based communication, telework).
- Communicate the availability of medical screening or other worker health resources (e.g., on-site nurse; telemedicine services).

The following administrative controls have been established for ACCESS TITLE AGENCY, LLC.

(Example: specify the Administrative control for each of the positions/job/task listed in the exposure determination, and how each engineering control is intended to function to prevent the spread of SARS-CoV-2.)

Positions/job/task	Administrative Control Type (workplace distancing, remote work, notifying customers)
Closer	Workplace distancing, curbside closings
Administrative	Workplace distancing, sneeze guards, limit public contact


## Hand Hygiene & Disinfection of Environmental Surfaces

Melissa Schaub and Brandi Wolf 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 employee's hands are potentially exposed to SARS-CoV2-19. When provision of handwashing facilities is not feasible, the employer shall provide employees with antiseptic hand sanitizers or towelettes.

Melissa Schaub and Brandi Wolf will be responsible for seeing that environmental surface 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-CoV2-19. When choosing cleaning chemicals, ACCESS TITLE AGENCY, LLC 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.

An enhanced cleaning and disinfection shall be performed after persons suspected or confirmed to have SARS-CoV2-19 have been in the workplace. Melissa Schaub and Brandi Wolf will be responsible for seeing that such a cleaning and disinfection is performed as required.

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/phones	Chlorox wipes	Twice a day
Scanner/copier	Chlorox wipes	Twice a day
Door knobs	Chlorox wipes	Twice a day

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

*(LIST ENHANCED METHODS)*

## Personal Protective Equipment (PPE)

ACCESS TITLE AGENCY, LLC will provide employees with personal protective equipment for protection from SARS-CoV-2 appropriate to the exposure risk associated with the

job following the CDC and OSHA guidance applicable to the industry and types of jobs at the workplace and in accordance with latest EO..

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 when required.
- 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.
- *Require masks to be worn when workers cannot consistently maintain six feet of separation from other individuals in the workplace and consider face shields when workers cannot consistently maintain three feet of separation from other individuals in the workplace.*

The construction industry must provide specific instructions for the distribution of personal protective equipment and designate on-site locations for soiled masks.

The following type(s) of PPE have been selected for use:

<b>Positions/job/task</b>	<b>PPE</b>
Closers	Face Masks
Administrative	Face Masks

**Health Surveillance**

ACCESS TITLE AGENCY, LLC \_\_\_ 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.                     Melissa Schaub and Brandi Wolf\_\_\_ will be responsible for ensuring that all required health surveillance provisions are performed as required.

At the beginning of each day at the start of each work shift           Melissa Schaub and Brandi Wolf\_\_\_ will screen employees for signs and symptoms COVID-19 as required. Employees have been directed to promptly report any signs and symptoms of COVID-19 to           Melissa Schaub and Brandi Wolf\_\_\_ before and during the work shift and have provided employees with instructions for how to make such a report to the employer.

Manufacturing facilities must also conduct a daily entry screening protocol for workers, contractors, suppliers, and any other individuals entering the facility, including a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19, together with temperature screening as soon as no-touch thermometers can be obtained.

Businesses or operations in the construction industry must also: Conduct a daily entry screening protocol for workers, contractors, suppliers, and any other individuals entering a worksite, including a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19, together with, if possible, a temperature screening.

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

*(DETAIL REPORTING INSTRUCTIONS PROVIDED TO EMPLOYEES HERE)*

\_\_\_\_\_ ACCESS TITLE AGENCY \_\_\_\_\_ 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:

- (a) Not allowing known or suspected cases to report to or remain at their work location.
- (b) Sending known or suspected cases to a location (for example, home) where they are self-isolating during their illness.
- (c) Assigning known or suspected cases to work alone at the location where they are self-isolating during their illness.

## **Training**

\_\_\_\_\_ Karen Kohler \_\_\_\_\_ shall coordinate SARS-CoV2 training and ensure compliance with all training requirements.

Train workers on, at a minimum:

- A. Routes by which the virus causing COVID-19 is transmitted from person to person.
- B. Distance that the virus can travel in the air, as well as the time it remains viable in the air and on environmental surfaces.
- C. Symptoms of COVID-19.
- D. 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.
- E. Measures that the facility is taking to prevent worker exposure to the virus, as described in the COVID-19 preparedness and response plan required under the most recent EO.
- F. Rules that the worker must follow in order to prevent exposure to and spread of the virus.
- G. The use of personal protective equipment, including the proper steps for putting it on and taking it off.

**NOTE:** It is recommended that records of employee training be maintained that at a minimum document the name(s) of employee(s) trained, date of training, name of trainer, and content of training.

## **Recordkeeping**

\_\_\_\_\_(name or job title)\_\_\_\_\_ shall coordinate SARS-CoV-2 required recordkeeping and ensure compliance with all such requirements, including those specified in the most recent EO.

The following records are required to be maintained:

1. Required training.
2. A record of daily entry self-screening protocol for all employees or contractors entering the workplace, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19.
3. When an employee is identified with a confirmed case of COVID-19.

## FREE ONSITE CONSULTATION SERVICE FOR EMPLOYERS

To help employers better understand and voluntarily comply with the MIOSHA Act, free Onsite Consultation programs are available to help small employers identify and correct potential safety and health hazards.



Michigan Occupational Safety and Health Administration  
Consultation Education and Training Division  
530 W. Allegan Street, P.O. Box 30643  
Lansing, Michigan 48909-8143

For further information or to request consultation, education and training services  
call 517-284-7720

or

visit our website at [www.michigan.gov/miosha](http://www.michigan.gov/miosha)

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