

COVID-19 Preparedness & Response Plan

For Lower and Medium Exposure Risk Employers ONLY

✔ General

The following COVID-19 preparedness & response plan has been established for NorthCare Network 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 Emergency Rules have general safeguards applicable for all workplaces and specific safeguards for certain industries. Lynn Bowman and Sandra Lambert have read these emergency rules carefully, developed the safeguards appropriate to NorthCare Network based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

NorthCare Network has designated one or more worksites supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The worksite supervisor(s) are Judi Brugman, Tami LeBlanc, Megan Rooney and Bob Wedin. 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. – N/A

The plan will be made readily available to our employees and is accessible on the NorthCare Network website at www.northcarenetwork.org under About – Quick Links and on the N:Drive at [N:\Policies-Plans-SOPs\Current Policies,Plans,SOPs--Word Format\Plans\Plan - COVID 19 Preparedness and Response Plan 120420 \[F\]](N:\Policies-Plans-SOPs\Current Policies,Plans,SOPs--Word Format\Plans\Plan - COVID 19 Preparedness and Response Plan 120420 [F]).

✔ Exposure Determination

NorthCare Network 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. N/A was responsible for the exposure determination.

NorthCare Network 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.

Lynn Bowman verified that NorthCare Network 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 sample plan is not intended for employers who have high exposure risk jobs.

NorthCare Network 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.

Job/Task	Exposure Risk Determination (Lower or Medium)	Qualifying Factors (Ex. No Public Contact, Public Contact)
Administrative	Lower	No Public Contact
Clinical	Lower	No Public Contact
SIS Assessor	Medium	Occasional Public Contact
Supervisors	Lower	No Public Contact

Engineering Controls

NorthCare Network 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.

CEO 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
CEO	All staff wear masks upon entering the building and while they are in the building
CEO	Staff are sitting at least six feet apart
CEO	Clorox wipes and disinfectant sprays are available for all staff
CEO	Lakestate Industries cleans the office three times a week

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. Tim Kangas 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 NorthCare Network:

(Choose the controls below that are feasible for your workplace. Delete the controls that are not feasible or applicable. Add additional rows for other feasible administrative controls that will be implemented. In the first column, indicate which jobs or tasks will

use each administrative control.)

Job/Task	Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)
All employees	Maintain at least six feet from everyone in the office.
All employees	Promote remote work (telecommuting) to the fullest extent possible.
All employees	Restrict business-related travel for employees to essential travel only.
All employees	Restrict face-to-face meetings. Communicate with others through phone, email, teleconferencing and web conferencing.
All employees	Restrict the number of visitors in the office at any given time.
All employees	Minimize the sharing of tools, office equipment, and items.
All employees	Require employees to wear cloth face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.
All employees	Require visitors to wear cloth face coverings.
All employees	Provide visitors with tissues and trash receptacles.
All employees	Encourage proper cough and sneeze etiquette of employees, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands.
All employees	Ensure that sick leave policies are flexible and consistent with public health guidance, so employees do not go to work sick.
All employees	Do not require a healthcare provider's note for employees who are sick with acute respiratory illness to validate their illness.
All employees	Maintain flexible policies that permit employees to stay home to care for a sick family member.

Hand Hygiene

Tim Kangas 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, NorthCare Network shall provide employees with antiseptic hand sanitizers or towelettes. NorthCare Network will provide time for employees to wash hands frequently and to use hand sanitizer.

NorthCare Network 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

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

Tim Kangas 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, NorthCare Network 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
Counters	Clorox wipes/disinfectant spray	As used
Desks	Clorox wipes/disinfectant spray	As used
Tables	Clorox wipes/disinfectant spray	As used
Printer/Scanner/Fax	Clorox wipes/disinfectant spray	As used
Door handles	Clorox wipes/disinfectant spray	As used
Chairs	Clorox wipes/disinfectant spray	As used
Phone/fax	Clorox wipes/disinfectant spray	As used
Toilets	Clorox wipes/disinfectant spray	As used
Sinks and faucets in bathrooms	Clorox wipes/disinfectant spray	As used

Kitchens/Board Room/Conference Rooms	Clorox wipes/disinfectant spray	As used
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Tim will meet with Sandra Lambert and Jason Wallner to discuss which cleaning company will be contacted to perform enhanced cleaning and disinfection of the office after staff have confirmed testing positive for COVID-19 and was at the office when positive. In the interim, that work area will be temporarily closed, and employees will be sent home or relocated. Sandra and or Jason will be responsible for ensuring the company who was contracted to deep clean followed protocol.

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

(LIST ENHANCED METHODS)

☑ Personal Protective Equipment (PPE)

NorthCare Network will provide employees with the types of personal protective equipment, including respirators if necessary, 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.

NorthCare Network will provide non-medical grade face coverings (cloth face coverings) to employees (cloth face coverings are technically not considered PPE. NorthCare Network will require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.

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

Job/Task	PPE
All Employees who are in the office	Gloves

☑ Health Surveillance

NorthCare Network will conduct a 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, together with, if possible, a temperature screening. All employees 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, NorthCare Network will have employees self-screen for COVID-19. NorthCare Network 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. NorthCare Network 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 their Supervisor and or the HR Coordinator before and during the work shift. NorthCare Network 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:

(LIST REPORTING INSTRUCTIONS PROVIDED TO EMPLOYEES)

NorthCare Network 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.

NorthCare Network 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 Supervisor and or the HR Coordinator 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, NorthCare Network will not reveal the name or identity of the confirmed case.

NorthCare Network 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

Lynn Bowman/HR Coordinator shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

NorthCare Network 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.

Lynn Bowman/HR 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

NorthCare Network 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.

Lynn Bowman/HR Coordinator will ensure that the records are kept.