

CROSSROADS INDUSTRIES

COVID-19 Preparedness & Response Plan For Lower and Medium Exposure Risk Employers

(Updated on January 11, 2021)

Foreword

Crossroads Industries takes the health and safety of our employees and clients seriously. We are all living through the spread of COVID-19 and the need for certain employees to continue in-person work. Others either are or will soon be welcomed back into work, either because they are critical infrastructure workers, because they are needed to conduct minimum basic operations for our business or because our business is once again allowed to open.

Crossroads Industries wants you to know that we are committed to reducing the risk of exposure to COVID-19 and we are ready to provide a healthy and safe workplace for our employees, clients, customers and guests. We are focused on three lines of defense:

1. Limiting the number of people together at the same time in the same place,
2. Regularly sanitizing all common areas, and
3. Requiring appropriate personal protection equipment including masks, gloves, etc.

The spread of COVID-19 in the workplace can come from several sources:

- Co-workers
- Clients
- Customers
- Guests - visitors/vendors/family members
- The General Public

General

The following COVID-19 preparedness & response plan has been established for **Crossroads Industries** 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). As of 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. Crossroads' **Executive Director** has read these guidance documents carefully, found the safeguards appropriate to **Crossroads Industries** 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. Crossroads' **Executive Director** 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 June 22, 2020.

Crossroads Industries has designated the following staff as its COVID-19 Workplace Coordinators:

- **Rik Rambo**, Executive Director, rrambo@crossrdsmi.org, 231-881-4574
- **Carrie Borowiak**, CBS Business Manager, cborowiak@crossrdsmi.org, 989-448-7450

- **Vicky Otto**, Program Manager, votto@crossrdsmi.org, 989-732-1233
- **Brandon Sieggreen**, CP Connections Coordinator, bspiye@crossrdsmi.org, 989-448-2288

The **Executive Director** will implement, monitor, and report on the COVID-19 control strategies developed in this plan. The worksite supervisor(s) are **Vicky Otto**, at Studio45, and **Carrie Borowiak**, at Crossroads Business Services. The supervisors 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.

This plan will be made readily available to employees via website and hard copy.

Exposure Determination

Crossroads Industries 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. Crossroads' **Executive Director** was responsible for the exposure determination.

Crossroads Industries 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.

Crossroads' **Executive Director** verifies that **Crossroads Industries** has no high exposure risk 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.

Crossroads Industries has categorized its jobs as follows:

Job/Task	Exposure Risk Determination (Lower or Medium)	Qualifying Factors (For Example, No Public Contact, Public Contact)
Direct Care Worker	Medium	Client & Public Contact
Employment Specialist/Job Coach	Medium	Client & Public Contact
Store Manager & Business Mgr	Medium	Client & Public Contact
Administrative Staff	Medium	Client & Public Contact

Engineering Controls

Crossroads Industries 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.

Crossroads' **Executive Director** 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 at Crossroads Industries:

Job/Task	Engineering Control
Client Program Management	Sneeze guards when less than 6' separation
Creative Pursuit Management	Open North and South doors for fresh outdoor air
CBS Management	Windows open for fresh outdoor air + Physical barrier at front counter

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. Crossroads' **Executive 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 **Crossroads Industries**:

Job/Task	Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)
All employees	Maintain at least six feet from everyone on the worksite.
	Provide employees and clients with non-medical grade face coverings (cloth face coverings).
	Require employees and clients to wear cloth face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace. <i>(Per MIOSHA, masks are Mandatory when social distancing and physical barriers are not possible)</i>
	Employees must "wear face coverings in shared spaces, including during in-person meetings and in restrooms and hallways," regardless of social distancing. <i>(new per MIOSHA COVID-19 Emergency Rules 10-14-20)</i>
	Move tables and equipment to increase distances between individuals.
	Use visual cues such as ground markings, signs, and physical barriers to prompt individuals to remain six feet from others.
	Implement staggered breaks.
	Promote remote work (telecommuting) to the fullest extent possible.
	Restrict business-related travel for employees to essential travel only.
	Restrict face-to-face meetings. Communicate with others through phone, email, teleconferencing, and web conferencing.
	Restrict the number of customers in the establishment at any given time.
	Minimize the sharing of tools, equipment, and items.
	Require customers and the public to wear cloth face coverings.
	Make cloth face coverings available to customers who do not have one.
	Keep customers informed about symptoms of COVID-19 and ask sick customers to stay at home until healthy again.
	Provide customers and the public with tissues and trash receptacles.
	Encourage proper cough and sneeze etiquette by employees, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands.
	Encourage hand hygiene etiquette & use of noncontact methods of greeting.
	Ensure that sick leave policies are flexible and consistent with public health guidance, so employees do not go to work sick.
	Do not require a healthcare provider's note for employees who are sick with acute respiratory illness to validate their illness.

	Maintain flexible policies that permit employees to stay home to care for a sick family member.
	Post signs related to COVID-19 signs, symptoms & related resources.

Personal Protective Equipment (PPE)

Crossroads Industries 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.

Crossroads Industries will provide non-medical grade face coverings (cloth face coverings) to employees.

Crossroads Industries will require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace. **Crossroads Industries** will consider face shields when employees cannot consistently maintain three feet of separation from other individuals in the workplace.

Hand Hygiene

Crossroads' **Executive 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, **Crossroads Industries** shall provide employees with antiseptic hand sanitizers or towelettes. **Crossroads Industries** will provide time for employees to wash hands frequently and to use hand sanitizer.

Health Surveillance

Crossroads Industries 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. Crossroads' **Executive 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, **Crossroads Industries** will have employees self-screen for COVID-19. **Crossroads Industries** 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. A no-touch thermometer will be used for temperature screening of employees. **Crossroads Industries** will similarly screen clients, contractors, suppliers, and any other individuals entering the worksite.

Employees have been directed to promptly report any signs and symptoms of COVID-19 to **Vicky Otto**, Program Supervisor at Studio45, or **Carrie Borowiak**, Business Manager at Crossroads Business Services, before and during the work shift. **Crossroads Industries** 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 can be found in Crossroads' **Infectious Disease Control Policy**, Version 0.1.

Crossroads Industries will physically isolate any employees or clients with known or suspected COVID-19 from

all other individuals, 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.

Crossroads Industries 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, Crossroads' **Executive Director** will notify both the local public health department, and any co-workers, clients, client's homes, 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, **Crossroads Industries** will not reveal the name or identity of the confirmed case.

Crossroads Industries 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

Crossroads' **Executive Director** (or designee) shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

Crossroads Industries 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.

Crossroads' **Human Resources representative** 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.

Visitors

As we work to help keep everyone safe during the COVID-19 pandemic, we are limiting guests/visitors in our facilities. All visitors must immediately check-in with either the Program Manager (at Studio45), or the Business Manager (at CBS) before any visit takes place. If allowed, visitors must follow guidelines to help increase their and others safety and limit potential exposures to COVID-19 while in our facilities. Visit will be documented in visitor log to include name of visitor, purpose of visit, date and times of visit. Visitors will be required to wear a mask at all times, except when eating or drinking, practice social distancing and wash their hands frequently. All visitors will be asked health screening questions and have their temperature checked upon arrival. Visitors with COVID-19 symptoms or a fever will be asked to visit at another time. The Manager that approves the visit will ensure all COVID protocols are being followed by visitor at all times.

Recordkeeping

Crossroads Industries 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, clients, 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.

Crossroads' **Executive Director** will ensure that the records are kept.

Insufficient Staffing

If there are not enough staff to provide safe programming, the Program Manager will contact all affected homes immediately so that arrangements can be made for keeping people home that day. If a staffing shortage occurs during the program day, the following steps will be taken in order:

1. Remaining staff will be reassigned as available, following existing staff to client ratios. Priority will be given to client programming.
2. If staff to client ratios cannot be maintained and/or safe programming cannot be provided, homes will be contacted, and transportation will be arranged to take affected clients home.

Disinfection of Environmental Surfaces

Crossroads Industries will increase facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (for example, tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, toilets, faucets, sinks, etc.), paying special attention to parts, products, and shared equipment (for example tools, computers, vehicles). **Crossroads Industries** will make cleaning supplies available to employees upon entry and at the worksite.

Crossroads' **Managers** 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, **Crossroads Industries** 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.

Crossroads Industries 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. Crossroads' **Executive Director** will be responsible for seeing that this protocol is followed.

Per the Centers for Disease Control (CDC), the following procedure will be followed for enhanced cleaning and disinfection after persons suspected/confirmed to have COVID-19 have been in a facility that "does not house people overnight" (<https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html>):

- Close off areas visited by the ill persons. Open outside doors and windows and use ventilating fans to increase air circulation in the area. Wait 24 hours or as long as practical before beginning cleaning and disinfection.
- **Clean and disinfect all areas such as offices, bathrooms, common areas, shared electronic equipment (like tablets, touch screens, keyboards, remote controls, and ATM machines) used by the ill persons, focusing especially on frequently touched surfaces.**
 - What's most important when a workspace is contaminated is to methodically track the steps of the infected person and clean any shared surfaces they touched with effective cleaning solutions.

- Per the CDC, if it has been more than 7 days since the person with suspected/confirmed COVID-19 visited or used the facility, additional cleaning and disinfection is not necessary.

How to Clean and Disinfect (per CDC)

Hard (Non-porous) Surfaces

- If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection.
- For disinfection, most common EPA-registered household disinfectants should be effective.
 - A list of products that are EPA-approved for use against the virus that causes COVID-19 is available at <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2-covid-19>. Follow the manufacturer's instructions for all cleaning and disinfection products for concentration, application method and contact time, etc.
 - Additionally, diluted household bleach solutions (at least 1000ppm sodium hypochlorite, or concentration of 5%–6%) can be used if appropriate for the surface. Follow manufacturer's instructions for application, ensuring a contact time of at least 1 minute, and allowing proper ventilation during and after application. Check to ensure the product is not past its expiration date. Never mix household bleach with ammonia or any other cleanser. Unexpired household bleach will be effective against coronaviruses when properly diluted. Bleach solutions will be effective for disinfection up to 24 hours.
 - Prepare a bleach solution by mixing:
 - 5 tablespoons (1/3 cup) bleach per gallon of room temperature water or
 - 4 teaspoons bleach per quart of room temperature water.
- **Cleaning staff and others should clean hands often**, including immediately after removing gloves and after contact with an ill person, by washing hands with soap and water for 20 seconds. If soap and water are not available and hands are not visibly dirty, an alcohol-based hand sanitizer that contains at least 60% alcohol may be used. However, if hands are visibly dirty, always wash hands with soap and water.
- Follow normal preventive actions while at work and home, including cleaning hands and avoiding touching eyes, nose, or mouth with unwashed hands.
 - Additional key times to clean hands include:
 - After blowing one's nose, coughing, or sneezing.
 - After using the restroom.
 - Before eating or preparing food.
 - After contact with animals or pets.
 - Before and after providing routine care for another person who needs assistance such as a child.

Soft (Porous) Surfaces

- For soft (porous) surfaces such as carpeted floor, rugs, and drapes, remove visible contamination if present and clean with appropriate cleaners indicated for use on these surfaces. After cleaning:
 - If the items can be laundered, launder items in accordance with the manufacturer's instructions using the warmest appropriate water setting for the items and then dry items completely.
 - Otherwise, use products as identified at <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2-covid-19>, and that are suitable for porous surfaces.

Electronics

- For electronics such as tablets, touch screens, keyboards, remote controls, and ATM machines, remove visible contamination if present.
 - Follow the manufacturer's instructions for all cleaning and disinfection products.
 - Consider use of wipeable covers for electronics.
 - If no manufacturer guidance is available, consider the use of alcohol-based wipes or sprays containing at least 70% alcohol to disinfect touch screens. Dry surfaces thoroughly to avoid pooling of liquids.

In all cleaning instances, ensure the disinfectant stays on for the kill time. Most Clorox or Lysol wipes have a four-minute kill claim, which means the surface needs to stay wet for four minutes if using those disinfectants.