

ITH of MICHIGAN LLC

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

General

The following SARS-CoV-2 Preparedness & Response Plan has been established for ITH of Michigan LLC, dba ITH Staffing, 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.

Exposure Determination

ITH of Michigan 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. Susan Schalk, Human Resources Manager, 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).

ITH of Michigan LLC 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)
Accounting	Low exposure	No public contact, only employee office on lower level of building
Management	Low exposure	Little exposure to public contact, private office, little contact within 6 feet
Human Resources	Low exposure	Little exposure to public contact, private office, little contact within 6 feet
Staffing Coordinator	Medium Risk	Some public contact during new hire orientations; some in-person interviews. Face masks required and little contact within 6 feet, plexiglass barrier over office counter
Field Temporary Employees	Medium Risk	Some public and co-worker contact; social distancing rules in place, face masks provided. Following protocols and given PPE same as direct employees of clients.

Engineering controls

ITH of Michigan 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. Sharon Miller, President, 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:

Positions/job/task	Engineering Control
Staffing Coordinator/Visitor Check-in Counter	Installed physical barrier, clear plastic sneeze guard
All staff and visitors	Food/drink touch points eliminated

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. ITH of Michigan LLC 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.

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.
- 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 ITH of Michigan LLC,

Positions/job/task	Administrative Control Type (workplace distancing, remote work, notifying customers)
All	Cloth facemasks were provided by employer to all staff; disposable face masks were purchased for visitors who enter the building without a face mask.
Employees/Visitors	Posters have been placed throughout the building for both employees and visitors with symptoms of COVID-19, hand washing, and personal hygiene. Posters have been placed on the only entry door for visitors with a list of symptoms and instructing visitors who have symptoms not to enter building, but to call and reschedule appointment
Visitors	One entry entrance and limited access to areas in the building
Staffing Coordinator	Interviews via Zoom, FaceTime and other virtual platforms whenever possible
Staff	Virtual meetings whenever possible, alternating between remote and in-person work through Phase 4, in-person interviews or new hire orientations by appointment
Staff	Staff are discouraged from using other workers' phones, desks or other work tools and equipment
Field Employees	Clients required to submit their Coronavirus Safety Plan that covers their employees as well as our employees assigned to their location. Employees instructed to call if they have safety concerns. Additional safety training and exposure/symptom protocols sent to all field employees.

Hand Hygiene & Disinfection of Environmental Surfaces

Sharon Miller, President, 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.

Sharon Miller, President 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, ITH of Michigan 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. Susan Schalk, Human Resources Manager,

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
Office (entirety)	Professional Cleaners with approved disinfectant	Weekly
Staff	Individual hand sanitizers over 60% distributed, hand sanitizer stations throughout building, Chlorox/Lysol wipes and spray and liquid hand sanitizer/ disinfectant available to all staff to use in their work areas	Daily – Frequently throughout day
Visitors	Individual hand sanitizers over 60% distributed to visitors, hand sanitizer stations in visitor designated areas. All touch points in designated areas cleaned with Chlorox/Lysol wipes and spray following visitors’ exit	Upon visitor entrance/exit
Staff/Visitors	Handwashing protocol posted in employee/staff rest rooms	Daily

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

The Envirox 118 product used by our professional cleaners diluted to 10oz per gallon for disinfecting in the past has been changed to 18 oz per gallon dilution during the outbreak of Covid 19.

Gallons of Savant Group Alcohol Antiseptic 80% topical solution hand sanitizer and disinfectant purchased and available for use throughout the building.

Personal Protective Equipment (PPE)

ITH of Michigan 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:

Positions/job/task	PPE
All employees	Cloth face masks to be worn when workers cannot consistently maintain six feet of separation from other individuals in the workplace
Visitors	Visitors are requested to wear cloth face covering when coming for their appointment via phone instructions and also a poster on the visitor entrance. If they do not, disposable masks have been purchased and will be given to them.

Health Surveillance

ITH of Michigan 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.

Susan Schalk, Human Resources Manager, 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 ITH of Michigan LLC 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 Sharon Miller, President or Susan Schalk, Human Resources Manager 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:

Employees should report symptoms or Covid 19 diagnosis to Sharon Miller or Susan Schalk as soon as known or suspected via in-person, email, or video chat such as FaceTime or Microsoft Teams.

ITH of Michigan LLC 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

Susan Schalk, Human Resources Manager, 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

Susan Schalk, Human Resources Manager, 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 visitors entering the workplace.
3. When an employee is identified with a confirmed case of COVID-19.