

COVID-19 Preparedness & Response Plan for MIOSHA Safety Training Venue at 600 Lakeshore Ave., Houghton, Michigan

General

The following COVID-19 preparedness & response plan has been established for MIOSHA Safety Training hosted by the Keweenaw Economic Development Alliance (KEDA) in Houghton Michigan 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. Jeff Ratcliffe, KEDA's executive Director has read these guidance documents carefully, found the safeguards appropriate for hosting MIOSHA safety training at a public venue provided by Michigan Technological University, known at the Lake Shore Center Community Room 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. Jeff Ratcliffe 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. [Click here for the EOs](#). [Click here for the CDC guidance documents](#). This plan reflects the EOs and CDC guidance as of August 17, 2020.

KEDA has designated one or more training venue supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The training venue supervisor(s) are Jeff Ratcliffe and the designated MIOSHA training instructor. A supervisor will remain on-site at all times when employees are present on site.

The plan will be made readily available to attendees. The plan will be made available via KEDA's website at www.kedabiz.com.

Exposure Determination

KEDA has evaluated routine and reasonably anticipated tasks and procedures for all attendees to determine whether there is actual or reasonably anticipated attendee exposure to SARS-CoV-2. Jeff Ratcliffe was responsible for the exposure determination.

KEDA has determined that attendance at MIOSHA safety training sessions 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.

Jeff Ratcliffe verifies that the MIOSHA safety training and venue has no high risk exposures. 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.

KEDA has categorized the training and venue as follows:

Training/Venue	Exposure Risk Determination (Lower or Medium)	Qualifying Factors (For Example, No Public Contact, Public Contact)
Safety Training	Lower	Attendees masked, distanced and stationary other than at breaks

Engineering Controls

There are no engineering controls being used for the venue. Capacity restrictions, distancing, masking, and hand washing will be the only controls used for the training course.

Administrative Controls

Administrative controls are policies, procedures, and practices that minimize or eliminate attendee exposure to the hazard. Jeff Ratcliffe 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 the MIOSHA safety training in Houghton:

(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 attendees and instructors	Maintain at least six feet from everyone in the venue with a maximum of three people per row.
All attendees and instructors	Restrict the number of attendees including instructors in the venue to 16.
All attendees and instructors	Require that attendees wash hands thoroughly before entering the classroom or use hand sanitizer
All attendees and instructors	Provide attendees with face coverings if they don't have one.
All attendees and instructors	Require attendees to wear cloth face coverings when they are inside the Lakeshore Center. If outside, a mask is required if they cannot maintain six feet distance from other people.
All attendees and instructors	Encourage proper cough and sneeze etiquette by employees, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands.

Hand Hygiene

Jeff Ratcliffe will be responsible for seeing that adequate handwashing facilities are available at the venue and that regular handwashing is required. Frequency of such handwashing will be determined in part by factors such as when and how often the attendee's hands are potentially exposed to SARS-CoV-2. When handwashing facilities are not available, KEDA shall provide attendees with antiseptic hand sanitizers or towelettes. KEDA and the MIOSHA instructor will provide time for attendees to wash hands frequently and to use hand sanitizer.

Disinfection of Environmental Surfaces

MTU, the venue owner will manage facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (for example, door handles).

The Lakeshore Center custodial staff 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-CoV-2. When choosing cleaning chemicals, MTU 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
Tables & Chairs	Spray disinfectant	Daily
Door handles	Spray disinfectant	Daily
Light switches	Spray disinfectant	Daily
Lectern & Technology	Spray disinfectant	Daily

MTU 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. MTU custodial staff will be responsible for seeing that this protocol is followed.

Personal Protective Equipment (PPE)

KEDA will provide attendees 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.

KEDA will make available non-medical grade face coverings (cloth face coverings) to attendees who do not bring their own. (Cloth face coverings are technically not considered PPE.) KEDA will require attendees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the venue.

Health Surveillance

KEDA has implemented a screening protocol to identify known or suspected cases of COVID-19 among attendees and restrict them from attending the training. Jeff Ratcliffe will be responsible for ensuring that all required health surveillance provisions are performed.

As attendees enter the training venue KEDA will have attendees self-screen for COVID-19. KEDA will have attendees complete a questionnaire covering the signs and symptoms of COVID-19 and their exposure to people with suspected or confirmed COVID-19. KEDA will similarly screen the instructor(s) entering the venue.

Attendees and instructors have been directed to promptly report any signs and symptoms of COVID-19 to Jeff

Ratcliffe before and during the training course. KEDA 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:

Cannot attend class if experiencing any of the following symptoms that developed within the last two weeks:

- a. Fever
- b. Chills
- c. Persistent coughs
- d. Shortness of breath
- e. Muscle aches
- f. Headache
- g. Loss of taste or smell
- h. Sore throat
- i. Runny nose
- j. Nausea or vomiting

KEDA will require any attendee with known or suspected COVID-19 to physically isolate from the remainder of the class, and not allow known or suspected cases to report to or remain at the training venue.

When an attendee is identified with a confirmed case of COVID-19, Jeff Ratcliffe will notify the local public health department immediately, and any other attendees and instructor(s) who may have come into contact with the person who is the confirmed case of COVID-19, within 24 hours. When notifying other attendees and instructor(s) KEDA will not reveal the name or identity of the confirmed case.

Training

Jeff Ratcliffe shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

KEDA will train attendees 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 attendee must take to notify the host of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
7. How to report unsafe venue conditions.

Jeff Ratcliffe shall create a record of the training. The record will list the names of the attendees trained, the training date, name of trainer, and content of training.

Recordkeeping

KEDA 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 attendees and instructors entering the venue, including a questionnaire covering signs and symptoms of COVID-19 and exposure to people with suspected or confirmed COVID-19.
3. When an attendee is identified with a confirmed case of COVID-19, record when the local public health department was notified; as well as any co-attendees and instructor(s) who may have come into contact with the person who was the confirmed case of COVID-19.

Jeff Ratcliffe will ensure that the records are kept.

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