

**DELTA COLLEGE's COVID-19  
EXPOSURE CONTROL PLAN**  
June 15, 2020

# **DELTA COLLEGE**

## **COVID-19 EXPOSURE CONTROL PLAN**

### Purpose

It is the policy of Delta College to provide a safe and healthful work environment for our employees. In pursuit of this endeavor, the following Exposure Control Plan (ECP) has been developed to eliminate or minimize occupational exposure to COVID-19 in accordance with Centers for Disease Control (CDC), Michigan Department of Health and Human Services (MDHHS), and Bay County Health Department.

This ECP includes:

- Determination of employee exposure - Screening questions
- Implementation of various methods of exposure control, including:
  - Engineering and work practice controls
  - Housekeeping, and
  - Personal protective equipment (PPE)
- Communication of hazards to employees and training
- Contact tracing procedures.

### Scope & Application

This ECP applies to all employees, contractors and vendors of Delta College working on any College campus, and any employee while performing College business outside of their home during this COVID-19 pandemic.

### Employee Exposure Determination

All employees have some degree of occupational exposure to COVID-19 and must comply with the procedures and work practices outlined in this document, including but not limited to:

- Social Distancing Guidelines
- Self-Check Health Screening
- Frequent Hand Washing
- Self-Quarantine (not coming to campus)

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

DIAGRAM from OSHA 3990-03-2020



**VERY HIGH EXPOSURE RISK** Jobs with a high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures. Workers include: • Healthcare and morgue workers performing aerosol-generating procedures on or collecting/handling specimens from potentially infectious patients or bodies of people known to have, or suspected of having, COVID-19 at the time of death.

**HIGH EXPOSURE RISK** Jobs with a high potential for exposure to known or suspected sources of COVID-19. Workers in this category include: • Healthcare delivery, healthcare support, medical transport, and mortuary workers exposed to known or suspected COVID-19 patients or bodies of people known to have, or suspected of having, COVID-19 at the time of death.

**MEDIUM EXPOSURE RISK** Jobs that require frequent/close contact with people who may be infected, but who are not known or suspected patients. Workers in this category include: • Those who may have contact with the general public (e.g., schools, high-population-density work environments, some high-volume retail settings), including individuals returning from locations with widespread COVID-19 transmission.

**LOWER EXPOSURE RISK (CAUTION)** Jobs that do not require contact with people known to be, or suspected of being, infected. • Workers in this category have minimal occupational contact with the public and other coworkers.

Delta College has determined that the following positions/jobs/tasks have been determined to have the following exposure determination(s).

<b>Positions/job/task</b>	<b>Determination</b>	<b>Qualifying Factors (i.e. no public contact, public contact, job task description)</b>
Administration/ Support Staff employees	Medium Exposure Risk	Regular contact/interactions with co-workers and students
Faculty employees	Medium Exposure Risk	Regular contact/interactions with co-workers and students
	High Exposure Risk	Faculty working in healthcare clinical settings (will follow safety requirements of clinical site)
Facilities employees	Medium Exposure Risk	Regular contact/interactions with co-workers and students, cleaning and environmental responsibilities, shared equipment
Food Services employees	Medium Exposure Risk	Regular contact/interactions with employees and students
Public Safety employees	Medium Exposure Risk	Regular contact/interactions with employees and students
	High Exposure Risk	Campus first responders
Student employees	Medium Exposure Risk	Regular contact/interaction with students and co-workers

### Engineering Controls

Delta College has implemented feasible engineering controls to prevent employee exposure to COVID-19. 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.

The Director of Facilities will be responsible for seeing that the correct engineering controls are chosen, installed and maintained and serviced for effectiveness as often as required.

## **METHODS OF IMPLEMENTATION AND EXPOSURE CONTROL**

All employees performing tasks identified in Employee Exposure Determination will comply with the procedures outlined below.

### General Methods of Exposure Reduction

- All Delta employees will conform to frequent hand washing.
  - Hand washing is the most effective method of preventing the spread of COVID-19.
  - Proper hand washing is more effective than hand sanitizer.
- ALL Delta employees shall practice social distancing.
  - Keeping six feet between people as much as possible
  - Distances will be marked in queuing areas
  - Seating in waiting areas will be marked to indicate recommended distances
  - Workstations will be staffed to allow for maximum distancing
- Face masks (coverings) are required in all common areas and classrooms for all employees (homemade face masks may be worn if preferred)
- ALL Delta employees shall complete a health assessment survey. Attachment A prior to reporting to work each day. If answering “yes” to any of the screening questions employees **do not report to work** and must contact their supervisor. The supervisor should contact Human Resources.
- Avoid touching your eyes, nose, face or mouth with unwashed hands.
- Where practical employees will refrain from using other employees’ computers, desks, and phones.
- All equipment will be disinfected where equipment is shared
- Use of shared non-essential equipment (microwave ranges, coffee makers, refrigerators, etc.) should be avoided. If used, be sure to wipe down before and after use.

### Engineering Controls for Medium Risk Exposure

- Where practical, barriers will be installed to provide a physical separation between the employee and student/customer.

### Administrative Controls for Medium Risk Exposure

- Efforts will be made to eliminate Face-to-Face transactions. Functions such as registration, payment, applications for financial aid, Counseling/Advising, transcript requests, etc... shall be conducted whenever practical via phone, electronic and/or web based methods.

- Inform students and patrons of the symptoms of COVID-19 and advise them to not come to campus if they are symptomatic.
- This messaging will be shared through signage and on the college website
- Delta will provide remote work options where feasible

## Disinfection of Environmental Surfaces

Delta College 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). Delta College will make cleaning supplies available to employees upon entry and at the worksite.

The Operations Manager 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, Delta College 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
High Touch Surfaces – door handles/hand rails/etc.	Bnc15/Spartan Ph7q/Betco	Daily/as needed
Restrooms		Twice per day
Counter tops/work surfaces		Daily/as needed

Delta College 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. Nick Bovid, Director of Facilities will be responsible for seeing that this protocol is followed.

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

This protocol is for cleaning and disinfection of areas where a person with COVID-19 spent time in College spaces. It is applied from 48 hours prior to the onset of symptoms until seven days have passed since the person was present in a College space.

After notification of a person with confirmed COVID-19 on a Delta College campus, the following cleaning and disinfecting protocol will be followed:

- A. Buildings and/or specific rooms and areas where a COVID-19 positive person spent time will be assessed on a case-by-case basis.
- B. Facilities staff will do the following (as applicable):
  - i. Identify areas that require restricted access during and immediately following enhanced cleaning.
  - ii. Communicate with impacted department(s).
  - iii. Coordinate with building managers.
- C. The cleaning crew will:
  - i. Follow the Enhanced Cleaning for Prevention guidance outlined in this document.
  - ii. Open windows to the outside to increase air circulation, if possible.
  - iii. If possible, wait 24 hours after a person with COVID-19 was present in a space prior to beginning cleaning and disinfection.
  - iv. If it is not possible to wait 24 hours, the cleaning crew should increase the level of PPE used while cleaning and disinfecting, including using a N95 filtering respirator (if available).
  - v. If an outside contractor is used for cleaning and disinfection, the proposed scope of work, including the products and their respective safety data sheets (SDSs), and application methods must be provided to Delta College Facilities prior to work commencing.
- D. Wear the required personal protective equipment (PPE) during cleaning and disinfecting:
  - i. Disposable gloves
  - ii. Safety glasses/goggles when there is a potential for splashing/spraying the disinfectant
  - iii. If entering the space less than 24 hours after the ill person was present, the cleaning crew should wear a N95 respirator (if available)

## Housekeeping Requirements

- Delta College has in place a robust facility cleaning procedure where all public spaces are cleaned on a daily basis. These cleaning procedures follow the recommendations put in place by the CDC for disinfecting spaces and high-touch point surfaces such as countertops, toilet rooms, drinking fountains, waiting rooms, seating, door handles and push/pull devices, light switches, etc...
- Employees will be responsible to disinfect their workspace routinely throughout the day. This supplemental cleaning shall include paying specific attention to:
  - Phones
  - Computer Keyboard and Mouse
  - Printers and Copiers
  - Credit Card Devices
  - Power Equipment and Tools
- Each department will develop area specific cleaning procedures base on the usage and needs of the department
- Supplies required for this cleaning will be provided

## Personal Protective Equipment (PPE)

Delta College will provide employees with personal protective equipment for protection from COVID-19 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:

- Determined based upon the hazard to the worker.  
*Face coverings will be required in all public/shared use spaces and when co-workers/students cannot consistently maintain six feet of separation from other individuals.*
- 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.

## Health Screening and Response Procedures

To reduce the risk for exposure to COVID-19, procedures for health screening and responding to potential exposure events have been developed. These procedures will focus on collecting information to reduce or eliminate the spread of COVID-19 at Delta College.

- Employees and students must complete the online health screening questionnaire prior to coming on campus. (<https://apps.delta.edu/CovidScreening/>)
- Individuals who self-report symptoms or a recent known exposure are not cleared to come to campus.
- Employees who test positive for COVID-19 must notify Human Resources.



- Students who test positive for COVID-19 must notify the Vice President of Student and Educational Services, if they have recently been on campus.

In the event an employee develops COVID-19 symptoms while at work, the following procedures shall be implemented;

- The symptomatic employee shall be directed to leave work by the most direct route and go home or to their health care provider
- The employee will be contacted by Human Resources to conduct Contact Tracing and provide further direction on returning to work
- The employee will be allowed to return to work based on the most current guidance from the CDC and Michigan Department of Health and Human Services

Delta College 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.

Delta College has established specific protocols in accordance with the CDC guidance for employees and students that outline the procedures and timeframes for returning to campus following the report of symptoms, high risk exposure and/or positive test results.

### Contact Tracing

In an effort to keep the college community safe Contact Tracing will be performed when the college is informed of any employee, student, and other visitors to the College exhibiting symptoms, and/or confirmed to be positive for COVID-19. Contact Tracing is vital to contain the spread of COVID-19 and only identified close contacts will be interviewed.

- Contact Tracing interviews will be conducted in conjunction with the Bay County Health Department and Delta Human Resources
- Contact Tracing information will be used by the college to inform employees who have had close contact with symptomatic employees.

### Training

The Director of Human Resources coordinate COVID-19 training and ensure compliance with all training requirements.

Train workers on, at a minimum:

- Routes by which the virus causing COVID-19 is transmitted from person to person and environmental surfaces.

- Symptoms of COVID-19.
- Steps the worker must take to notify Delta of any symptoms of COVID- 19 or a suspected or confirmed diagnosis of COVID-19.
- Measures that Delta College is taking to prevent worker exposure to the virus, as described in the COVID-19 preparedness and response plan required under the most recent Executive Order.
- Protocols/behaviors that employees and students must follow in order to prevent exposure to and spread of the virus.
- The use of personal protective equipment, including the proper steps for putting it on and taking it off.

### Recordkeeping

The Director of Human Resources coordinate COVID-19 required recordkeeping and ensure compliance with all such requirements, including those specified in the most recent Executive Order.

The following records are required to be maintained

- Required training.
- 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.
- When an employee is identified with a confirmed case of COVID-19.

For questions regarding this **COVID-19 Exposure Control Plan**, contact **Scott Lewless, Director of Human Resources** at [scottlewless@delta.edu](mailto:scottlewless@delta.edu).