

COVID-19 PREPAREDNESS AND RESPONSE PLAN

Western Theological Seminary takes the health and safety of our employees extremely seriously. With the spread of COVID-19 and the need for certain employees to continue in-person work, we are committed to reducing the risk of exposure to COVID-19 at work and to promoting healthy and safe workplace practices for all employees.

This Plan is based on information and guidance from the CDC, OSHA, MIOSHA, and the State of Michigan at the time of its development and is subject to change based on further information provided by any of these entities. We are following the experts and are committed to following all legal requirements and to implementing best practices to protect our employees.

This Plan incorporates riders or attachments that will set forth the most current requirements and practices for our specific industry, if appropriate.

We have identified the following potential sources of possible spread COVID-19 in the workplace

- Employees
- Students
- Visitors
- Library patrons

COVID-19 WORKPLACE COORDINATOR

We have designated Rayetta Perez, Director of Administration and Human Resources, as our COVID-19 Workplace Coordinator. The Coordinator is responsible for staying abreast of federal, state and local guidance and incorporating those recommendations into the Seminary's workplace. The Coordinator is also responsible for reviewing human resources policies and practices to make sure that they are consistent with this Plan and existing federal, state and local requirements.

The Workplace Coordinator can be reached at the following:

Rayetta Perez
Director of Administration and Human Resources
(616) 392.8555 x 103
rayetta.perez@westernsem.edu

We have also designated David Becker, Superintendent of Buildings and Grounds, as our COVID-19 Safety Coordinator to implement, monitor, and report on the COVID-19 control strategies contained in this Plan.

RESPONSIBILITIES OF SUPERVISORS AND MANAGERS

All managers and supervisors must be familiar with this Plan and be ready to answer questions from employees. Managers and supervisors must set a good example by following this Plan at all times. This involves practicing good personal hygiene and worksite safety practices to prevent the spread of the virus. Managers and supervisors must encourage this same behavior from all employees.

RESPONSIBILITIES OF EMPLOYEES

All employees are expected to help with our prevention efforts while at work. To minimize the spread of COVID-19 at the seminary, everyone must play their part. As set forth below, we have instituted various housekeeping, social distancing, and other best practices at WTS to minimize exposure to COVID-19 and prevent its spread in the workplace. All employees must follow these best practices at all times for them to be effective. Beyond these best practices, we require employees to report immediately to their managers or supervisors if they are experiencing signs or symptoms of COVID-19, as described below. If employees have a specific question about this Plan, they should ask their manager or supervisor or contact Rayetta Perez. If employees have concerns about their working conditions or safety, they should contact Rayetta to implement, monitor, and report on the rules and measures contained in this Plan.

OSHA and the CDC have provided the following control and preventive guidance for all employees, regardless of exposure risk:

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes.
- Avoid close contact with people who are sick.
- While COVID-19 is a pandemic, all non-vaccinated employees must maintain appropriate social distance of six feet to the greatest extent possible.

In addition, employees must familiarize themselves with the symptoms and exposure risks of COVID-19. The principal symptoms of COVID-19 include the following:

- Any **one** of the following:
 - Fever;
 - Uncontrolled cough;
 - atypical new onset of shortness of breath
- Or, **at least two** of the following not explained by a known physical condition:
 - Loss of taste or smell;
 - Muscle aches;
 - Sore throat;
 - Severe headache;
 - diarrhea;
 - vomiting;
 - abdominal pain

If employees develop the principal symptoms of COVID, they must not to report to work or leave work immediately, notify their supervisor immediately after leaving the premises, and consult their healthcare provider. Likewise, if a non-fully vaccinated employee come into close contact with someone who tests positive for COVID-19, they must notify their supervisor immediately and consult their healthcare provider.

Do so without coming into the facility. The seminary will work to identify any employees who have close contact with individuals with COVID-19 symptoms.

“Close contact” is not brief or incidental contact with a person with COVID-19 symptoms. Instead, the CDC¹ defines “close contact” as being within six feet of a COVID-19 infected person for a cumulative total of 15 minutes or more over a 24-hour period starting from two days before illness onset (or, for asymptomatic patients, two days prior to specimen collection) until the time the person is isolated.

WORKSITE PREVENTIVE MEASURES

Minimizing exposure from co-workers.

WTS will take the following steps to minimize exposure from co-workers to COVID-19:

- Provide non-fully vaccinated employees with non-medical grade face masks to wear while at work.
- Require all non-fully vaccinated employees to wear masks when they cannot consistently maintain six feet of separation from other individuals in the workplace.
- Educate employees on protective behaviors that reduce the spread of COVID-19 and provide employees with the necessary tools for these protective behaviors, including the following:
 - Post CDC information, including recommendations on risk factors at home and in the community
 - Train all employees on the workplace infection-control practices in place, including information on vaccinations available for COVID-19, the proper use of personal protective equipment (PPE), the steps employees must take to notify the Seminary if they experience any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19, and how to report unsafe working conditions, including available reporting avenues.
 - Maintain a record or log of all employees who received training for six months from the date of training.
 - Inform employees of the importance of good hand hygiene and provide time for employees to wash hands regularly with soap and water for at least 20 seconds because this is one of the most effective ways for employees to minimize exposure to COVID-19. If soap and water are not readily available, employees should use alcohol-based hand sanitizer that is at least 60% alcohol. If hands are visibly dirty, soap and water should be chosen over hand sanitizer.
 - Remind non-fully vaccinated employees that they should wear masks, at a minimum, whenever they cannot consistently maintain six feet of distance from others while working
 - Encourage and require all non-fully vaccinated employee to implement social distancing to the greatest extent possible while in the workplace.
 - Require all employees to wear face masks and follow social distancing to the maximum extent possible if using public transportation to travel to or for work.
- Develop protocol for social distancing practices for non-fully vaccinated employees, such as:
 - Evaluate areas in which employees work within 6 feet of each other and determine options to increase distance apart.

¹ Definitions of “close contact” may vary. Employers should follow the guidance of their local public health departments.

- Restrict employees from the workplace if they display symptoms of COVID-19
 - Conduct a daily entry self-screening protocol for all employees or contractors entering the workplace. This will include, at a minimum, a questionnaire to determine whether the employee has symptoms of COVID-19 or exposure to an individual that could have COVID-19, and if possible, a temperature screening.
 - Maintain documentation or a log for non-fully vaccinated employees, showing this daily protocol was followed.
 - Encourage employees to self-report to supervisor as soon as possible after developing symptoms of COVID-19.
 - Immediately separate any employee with symptoms from other individuals and send him/her home.
 - Allow employees who display the principal symptoms of COVID-19, who have not yet tested positive for COVID-19, to return to the workplace only after:
 - The employee receives a negative COVID-19 test result; or
 - The CDC isolation period has passed (currently 10 days after the onset of symptoms, 24 hours have passed since the resolution of a fever without the use of fever reducing medications, and all symptoms have improved).
 - Follow all Michigan MDHHS orders, MIOSHA rules, Michigan law, and any county health department rules regarding safety.

- Actively encourage sick employees to stay home
 - Apply available paid time off options and flexible attendance requirements
 - Follow state and federal guidance for return to work
 - Implement protocol for return to work after symptoms of COVID-19

- Actively encourage non-fully vaccinated employees to stay home if they have been in close contact with a confirmed or suspected case of COVID-19
 - Apply available paid time off options and flexible attendance requirements
 - Follow state and federal guidance for return to work
 - Implement protocol for return to work after potential exposure to COVID-19
 - Follow CDC guidance
 - Follow Michigan law regarding the period of time an employee should stay home from work

- Develop protocol to follow if an employee has a confirmed case of COVID-19
 - Isolate and send potentially exposed employees home
 - Notify all non-fully vaccinated individuals who were in close contact with the confirmed case of COVID-19 during the applicable time period and send those employees home to quarantine until either of the following are met:
 - 14 days has passed from the date of last close contact; or
 - The local health department or health care provider has advised the employee that he or she can follow the CDC's option to reduce the quarantine period to 10 days (without testing) or seven days (with testing).
 - Notify the seminary's leadership of the confirmed case of COVID-19
 - Within 24 hours of learning of employee who tests positive for COVID-19:
 - Notify any co-workers, contractors, or suppliers/vendors who may have come in contact with the person with a confirmed case of COVID-19

- Document efforts resulting in notification
 - Evaluate OSHA reporting/recordkeeping requirements
 - Allow employees with a confirmed case of COVID-19 to return to the workplace only after:
 - The CDC isolation period has passed (this is currently 10 days from the date of the positive test or 10 days from when the employee developed symptoms, whichever is later);
 - 24 hours have passed since the resolution of fever without the use of fever reducing medications; and
 - All symptoms have improved.
 - Maintain records of notification to all individuals who may have come into contact with the infected employee
- Perform increased routine environmental cleaning and disinfection
 - Increase facility cleaning and disinfection to limit exposure to COVID-19 in accordance with the latest CDC guidance.
 - Use Environmental Protection Agency (EPA)-approved disinfectants that are expected to be effective against COVID-19 based on data for harder to kill viruses.
 - Provide employees with time to wash their hands regularly or, alternatively, use alcohol-based hand sanitizer.
 - Maintain Safety Data Sheets of all disinfectants used on site
- Evaluate engineering controls using the building ventilation system with the goal of:
 - Increasing ventilation rates.
 - Increasing the percentage of outdoor air that circulates into the system.
- Evaluate options for employees at a higher risk for serious illness due to COVID-19
- Plan to monitor and respond to absenteeism
 - Implement plans to continue your essential business functions in case you experience higher than usual absenteeism.
 - Cross-train employees to perform essential functions so the workplace can operate even if key employees are absent.
- Remind employees about the employee assistance program (EAP) resources and community resources as needed.
- Talk with companies that provide contract or temporary employees about the importance of sick employees staying home and encourage them to develop non-punitive leave policies.

Minimizing exposure from coworkers, students, visitors, and library patrons

- Evaluate what business practices are needed to maintain critical operations (e.g., identify alternative suppliers, prioritize existing customers, or temporarily suspend some of your operations if needed).
- Develop protocol for face mask and social distancing practices
 - Require non-fully vaccinated persons to wear a face mask. WTS will post a sign notifying people that wearing a mask is required unless a person falls into a specified exemption.
- Evaluate options for assessing symptoms of COVID-19 and removing individuals from the workplace with symptoms

Minimizing exposure from visitors

- Talk with business partners about the Seminary's Plan
- If needed, identify alternate supply chains for critical goods and services. Some goods and services may be in higher demand or unavailable
- Develop protocol for health screening/questionnaire for visitors/vendors

Minimizing exposure from the general public

- Be prepared to change business practices if needed to maintain critical operations (e.g., identify alternative suppliers, prioritize existing customers, or temporarily suspend some operations if needed).

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