Southwestern Michigan College
COVID-19 Preparedness and Response Plan

In accordance with Michigan Executive Orders 2020-59 and 2020-91, Southwestern Michigan College (“The college”) institutes this COVID-19 Preparedness and Response Plan (“Plan”).

The college aims to protect its workforce by enacting all appropriate prevention efforts. The college is continually monitoring guidance from local, state, and federal health officials and implementing workplace and plan modifications where appropriate.

In addition, the college has designated workplace coordinators in order to implement, monitor, and report on the COVID-19 control strategies it has developed. One designated coordinator shall remain on-site at all times when employees are present on campus.

The college has enacted a phased approach to reopening its campuses in order to provide for the safety of its community (see SMC Campus Reopening Plan at the end of this document). Each phase incorporates the below mitigation efforts in various degrees and is designed to methodically reopen the campus while allowing for restrictions to be reenacted if necessary.

Employees with questions are encouraged to contact Human Resources via phone at 269-783-2110 and/or email at hr@swmich.edu.

Prevention Efforts and Workplace Controls

Training
The college will train all employees on the following:

- The proper use of personal protective equipment.
- Steps the employee must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
- How to report unsafe working conditions.
- Measures and procedures the employer is implementing to prevent employee exposure.
- Other state or federal recommended/mandated employee COVID-19 awareness material.

Cleanliness and Social Distancing

Employees who are able to perform their essential duties remotely may be permitted to work from home in accordance with approved telework arrangements.

Only employees performing necessary work are directed to report on-site. For such workers, the college abides by the recommended social distancing and other safety measures and establishes the following:

- All persons shall be health screened using government-recommended procedures prior to entering campus buildings.
  - This screening shall take place in person, online or via exterior building signage and may be amended as necessary.
- Face coverings are required and made available to all persons entering campus buildings.
  - Employees are required to wear face coverings upon entering a campus building, in shared spaces, for in-person meetings, in restrooms, in hallways and when they cannot consistently maintain six feet of person-to-person separation and/or barriers are not available.
- Employees are required to maintain social distance when reporting to and leaving from work.
  - Each building shall have a designated public entry. Employees shall use entrances separate from these public entry points (when in use) in order to minimize congestion.
  - The college shall provide visual indicators of appropriate social distancing spacing at building entrances in case of congestion.
• Campus buildings remain closed to all non-essential (non-college-business-related) visitors until further notice.
  o Visitors who arrive on campus to conduct college business may enter designated campus buildings upon screening, respecting social distance and mask use in buildings.
  o The times that each building is open to the public may be limited in order to provide for cleaning and disinfecting.
  o Appointments and virtual meetings are encouraged and/or required dependent on the Plan (see Attachment A).
• Employees are encouraged to maintain physical distance even when on break, as well as before and after working hours.
• Employees’ work stations should be no fewer than six feet apart.
• The college shall restrict non-essential common spaces and provide visual cues and signage to guide movement and activity (e.g., restricting elevator capacity, single building entrance and exits, directional signage, etc.).
• All meetings are held remotely when possible and any in-person meetings shall only take place using social distancing guidelines and with the use of proper barriers such as masks.
• Social gatherings and meetings that do not allow for social distancing or that create unnecessary movement through the office are prohibited.
• Physical barriers shall be placed in locations where employees must meet with the public/students.
• Employees should consider use of virtual meetings for most one-on-one student or authorized visitor meetings and are discouraged from meeting with the public in their personal office or work space without physical barriers in place.
  o One-on-one meeting locations that provide mitigation barriers and allow for privacy shall be set aside for use when virtual meetings are not practical or available.
• Employees’ interactions with the general public will be modified to allow for additional physical space between parties.
• The college may use flexible work hours, whenever possible, to limit the number of employees simultaneously working on-site.
• Signage encouraging hand washing, social distancing and mask use will be posted throughout all buildings, bathrooms and common areas.
• Non-essential business travel is postponed or cancelled until further notice.

In addition, the college is instituting the following cleanliness measures:
• Where possible, increasing ventilation rates and circulation throughout work sites;
• Performing routine environmental cleaning and disinfection, especially of common areas;
• Where available, providing hand sanitizer in high-traffic areas;
• Providing disinfecting supplies and requiring that employees wipe down their work stations at least at the beginning and end of each work day; and
• Deactivating all water fountain spouts.

Employees are expected to minimize COVID-19 exposure by:
• Cleaning work stations and high-touch surfaces at the beginning and end of each shift;
• Avoiding, when possible, the use of other employees’ phones, desks, offices, or other work tools and equipment;
• Frequently washing hands with soap and water for at least 20 seconds;
• Using hand sanitizer when soap and water are unavailable;
• Avoiding touching their faces with unwashed hands;
• Avoiding handshakes or other physical contact;
• Avoiding close contact with sick people;
• Practicing respiratory etiquette, including covering coughs and sneezes with their arms;
• Immediately reporting unsafe or unsanitary conditions on the college premises to their supervisors;
• Complying with the college’s daily screening processes;
• Notifying the college and seeking medical attention and/or following medical advice if experiencing COVID-19 symptoms; and
• Complying with self-isolation or quarantine orders.
Supplemental Measures Upon Notification of Employee’s COVID-19 Diagnosis and/or Symptoms

A person with a COVID-19 diagnosis or who displays symptoms consistent with COVID-19 must be immediately removed from campus.

In response to a confirmed diagnosis, within 24 hours the college will:

- Inform all employees, contractors or suppliers with and near whom the diagnosed person was in contact with of a potential exposure;
- Notify the Cass/Van Buren or Berrien Health Department;
- Keep confidential the identity of the diagnosed/symptomatic employee to the extent possible; and
- Conduct deep cleaning of the diagnosed/symptomatic employee’s workstation, as well as those common areas potentially infected by the employee.
- Complete an OSHA Form 300A “if it is more likely than not that a factor or exposure in the workplace caused or contributed to the illness.”
  - If an employee infects a coworker, the coworker has suffered a work-related illness if one of the recording criteria (e.g., medical treatment or days away from work) is met.

All employees who worked in sustained, close proximity to the diagnosed/symptomatic employee will also be removed from the worksite for at least 14 days; however, should these exposed employees later develop COVID-19 symptoms and/or receive a confirmed diagnosis, they may not report on-site until all return-to-work requirements are met, as defined below.

Worker Exposure Classification

Employees’ “worker exposure” is classified as medium risk by the Occupational Safety and Health Administration’s guidance because they frequently and/or closely interact with the general public.

Given this classification, the college provides the following controls in addition to the above-summarized prevention efforts: installing physical barriers where feasible, limiting exposure to the general public, and minimizing face-to-face contact.

Identification and Isolation of Sick and/or Exposed Employees

Risk and exposure determinations are made without regard to employees’ protected characteristics, as defined by local, state, and federal law.

Any health-related information and documentation gathered from employees is maintained confidentially and in compliance with state and federal law. Specifically, medical documentation is stored separate from employees’ personnel documentation.

Employees’ Self-Monitoring

The following employees should not report to work and, upon notification to the college, will be removed from the regular work schedule:

- Employees who display COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting, whether or not accompanied by a formal COVID-19 diagnosis;
- Employees who, in the last 14 days, have had close contact with and/or live with any person having a confirmed COVID-19 diagnosis; and
- Employees who, in the last 14 days, have had close contact with and/or live with any person displaying COVID-19 symptoms, such as fever, cough, shortness of breath, sore throat, new loss of smell or taste, and/or gastrointestinal problems, including nausea, diarrhea, and vomiting.

Such employees may only resume in-person work upon meeting all return-to-work requirements, as defined below.

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**Daily Screenings**

To prevent the spread of COVID-19 and reduce the potential risk of exposure, the college screens employees on a daily basis.

Employees are asked the following questions before entering the worksite:

- Have you experienced any of the following symptoms?
  - Chills or repeated shaking due to chills; a new, uncontrolled cough that causes difficulty breathing; acute loss of taste or smell; digestive symptoms (diarrhea, vomiting, or abdominal pain); muscle pain; a new severe headache; sore throat
- Have you traveled outside of the US within the last 14 days?
- Have you had close contact (within 6 feet for 15 minutes or longer) with a confirmed or probable COVID-19 case?
- Is your temperature greater than 100.4 degrees?

A “yes” answer to any of these questions will require the employee to not come to work and to notify Human Resources.

Employees who develop symptoms during their shift must immediately report to their supervisor and/or Human Resources.

**Return-to-Work Requirements**

Employees who were themselves diagnosed with COVID-19 may only return to work upon confirmation of the cessation of symptoms and contagiousness, proof of which may be acquired via the test-based strategy or the non-test-based strategy.

The test-based strategy is preferred but relies upon the availability of testing supplies and laboratory capacity. Under this strategy, employees may discontinue isolation and return to work upon achieving the following conditions:

- Resolution of fever without the use of fever-reducing medications;
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); and
- Negative results of an FDA Emergency Use Authorized molecular assay for COVID-19 from two consecutive nasopharyngeal swab specimens collected at least 24 hours apart.

Under the non-test-based strategy, employees may discontinue isolation and return to work upon achieving the following conditions:

- At least 1 days (24 hours) have passed since recovery, defined as the resolution of fever without the use of fever-reducing medications;
- Improvement in respiratory symptoms (e.g., cough, shortness of breath); and
- At least 10 days have passed since symptoms first appeared.

Employees who have tested positive for COVID-19 but have no symptoms must not return to work for 10 days since the positive test as long as they remain asymptomatic.

Employees who came into close contact with, or live with, an individual with a confirmed diagnosis or symptoms may return to work after either 14 days have passed since the last close contact with the diagnosed/symptomatic individual, or the diagnosed/symptomatic individual receives a negative COVID-19 test.

Employees are typically required to submit a release to return to work from a health care provider; given the current stressors on the healthcare system, the college may accept written statements from employees confirming all the factors supporting their release.

**Workplace Flexibilities and Potential Benefits for Employees Affected by COVID-19**

Employees may be eligible for paid and unpaid leaves of absence.

Employees may be permitted to use available paid time off provided under college policy, concurrently with or to supplement any approved leave.

Revised 8/11/2020
FFCRA

Employees may qualify for two different types of paid leave under the Families First Coronavirus Response Act ("FFCRA").

Under the Emergency Paid Sick Leave Act ("EPSLA"), employees may request up to two weeks of paid leave for the following reasons:

- Subject to a Federal, State, or local quarantine or isolation order related to COVID-19;
- Advised to self-quarantine due to concerns related to COVID-19;
- Experiencing symptoms of COVID-19 and seeking a medical diagnosis;
- Caring for an individual subject to a quarantine or isolation order or advised to self-quarantine due to concerns related to COVID-19;
- Caring for a son or daughter whose school or childcare provider is closed or unavailable due to COVID-19 precautions; or
- Experiencing any other substantially similar condition specified by the Secretary of Health and Human Services, in consultation with the Secretary of the Treasury and the Secretary of Labor.

For full-time employees, two weeks of leave equates to 80 hours; for part-time employees, two weeks of leave equates to a number of hours equivalent to the number of hours usually worked in a two-week period.

Paid leave for reasons 1, 2, and 3 above is paid at the employee’s regular rate of pay, capped at $511/day. Paid leave for reasons 4, 5, and 6 above is paid at a rate equivalent to two-thirds of an employee’s regular rate of pay or minimum wage, whichever is greater, capped at $200/day.

Under the Emergency Family and Medical Leave Expansion Act, employees may seek up to twelve weeks of leave to care for a son or daughter whose school or childcare provider is closed or unavailable due to COVID-19 precautions. The first two weeks of leave, which run concurrently with the EPSLA leave, may be unpaid; the remaining ten weeks of leave are paid at a rate equivalent to two-thirds of an employee’s regular rate of pay or minimum wage, whichever is greater, capped at $200/day.

Executive Order 2020-36

Employees who require leave beyond the EPSLA because of their own COVID-19 diagnosis/symptoms, or because they have had close contact or live with an individual with a COVID-19 diagnosis/symptoms, may be eligible for unpaid leave under Executive Order 2020-36 until permitted thereunder to return to work.

Unemployment Compensation Benefits

Under Executive Order 2020-57 and the federal CARES Act, unemployment compensation benefits are expanded in terms of eligibility, amount, and duration.

Employees who are unable to report to work for reasons related to COVID-19 are referred to Human Resources for information on unemployment compensation benefits. Such reasons include the following:

- Being under self-isolation or self-quarantine in response to elevated risk from COVID-19 due to being immunocompromised;
- Displaying at least one of the principal symptoms of COVID-19 (i.e., fever, atypical cough, atypical shortness of breath);
- Having close contact in the last 14 days with a confirmed COVID-19 diagnosis;
- Needing to care for someone with a confirmed COVID-19 diagnosis; and
- Fulfilling a family care responsibility as a result of a government directive (e.g., caring for a child whose school or childcare provider is closed or otherwise unavailable due to COVID-19).

FMLA and ADA

Employees may be entitled to unpaid leave under the Family and Medical Leave Act ("FMLA") if their absence is related to their own serious health condition or that of a family member. COVID-19 may constitute a serious health condition where “complications arise.”

The college is also mindful of its obligations under the Americans with Disabilities Act ("ADA"). Specifically, if an employee requests an accommodation because of a condition that may be complicated by COVID-19

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(e.g., cystic fibrosis, emphysema, COPD), then the college engages in the interactive process to provide a reasonable accommodation. This may mean allowing the employee to work remotely (if reasonable) or work an alternative schedule.

**Plan Updates and Expiration**
This Plan responds to the COVID-19 outbreak. As this pandemic progresses, the college will update this Plan and its corresponding processes.

This plan will expire upon conclusion of its need, as determined by the college and in accordance with guidance from local, state, and federal health officials.

Nothing in this plan shall supersede local, state, or federal law.
<table>
<thead>
<tr>
<th>PHASE 0</th>
<th>PHASE 1</th>
<th>PHASE 2</th>
<th>PHASE 3</th>
<th>PHASE 4</th>
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</thead>
<tbody>
<tr>
<td>CURRENT</td>
<td>TENTATIVE DATE: JUNE 8</td>
<td>TENTATIVE DATE: TBD</td>
<td>TENTATIVE DATE: TBD</td>
<td>TENTATIVE DATE: TBD</td>
</tr>
<tr>
<td>Campus is closed to all but designated necessary personnel and residential housing students.</td>
<td>Campus is open to designated necessary personnel only.</td>
<td>Campus is open to designated necessary personnel, to the public by appointment only, and to the minimal staff needed to fulfill appointments.</td>
<td>Campus is open to all employees and the public with restrictions.</td>
<td>Campus is open with limited or no restrictions.</td>
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<tr>
<td>• Necessary personnel who come to campus are screened daily and must follow SMC COVID-19 safety guidelines.</td>
<td>• Necessary personnel are only those who are needed to assist in preparing for public interaction or who have been identified to complete specific tasks.</td>
<td>• Additional personnel are designated to work on campus to serve the public.</td>
<td>• Employee PPE is provided and mandatory when social distancing and physical barriers are not possible.</td>
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<tr>
<td>○ Daily health screening form</td>
<td>○ Employee PPE is provided and mandatory when social distancing and physical barriers are not possible.</td>
<td>○ Workspaces are reconfigured to safely serve the public.</td>
<td>○ Necessary personnel who come to campus are screened daily and continue to follow COVID-19 safety guidelines.</td>
<td>○ Necessary personnel who come to campus are screened daily and continue to follow COVID-19 safety guidelines.</td>
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<tr>
<td>○ Physical distancing</td>
<td>○ Remote work continues for all other employees.</td>
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<td>○ Virtual meetings only</td>
<td>○ Employee hours are 8 a.m.- 5 p.m., subject to adjustment by department managers.</td>
<td>○ Most instruction continues online. Instruction that is not online follows the SMC COVID-19 Response Plan for campus instruction.</td>
<td>○ Employee PPE is provided and mandatory when social distancing and physical barriers are not possible.</td>
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<tr>
<td>○ Frequent handwashing and sanitizing</td>
<td></td>
<td>○ The bookstore and a few in-person instruction classrooms may open on a limited basis.</td>
<td>○ Employees who visit campus are screened daily and required to follow COVID-19 safety guidelines.</td>
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<td>○ No group meals</td>
<td></td>
<td>○ Public access is limited to the Briegel Building and the Niles Campus with pre-arranged appointments between 10 a.m.-3 p.m. only. Members of the public are screened and required to wear masks (provided) to enter buildings.</td>
<td>○ High-risk employees encouraged to work from home, subject to the needs of their department.</td>
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<tr>
<td>• All other employees work from home.</td>
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<td>○ Limited campus tours by appointment (five persons maximum) may begin.</td>
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