COVID-19 Preparedness and Response Plan for
On-campus Employees during the COVID-19 Pandemic

Updated June 1, 2021

This Plan has been amended to include elements from the MDHHS Emergency Order: Gatherings and Face Mask Order as applicable to the workplace. This is set to expire on July 1, 2021. Text is in green to highlight short-term nature.
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Introduction

Coronavirus Disease 2019 (COVID-19) is a respiratory disease caused by the SARS-CoV-2 virus. This document will summarize the University of Michigan preparedness and response actions for COVID-19 based on traditional infection prevention and industrial hygiene practices. It focuses on the implementation of engineering, administrative, and work practice controls and personal protective equipment (PPE), in the effort to control employee exposures to the extent feasible.

This plan is intended to provide information on the risk levels in workplace settings and the appropriate control measures that should be implemented based on the risk present. This document will be adjusted as needed as COVID-19 outbreak conditions change, including new information about the virus, its transmission, and impacts, becomes available.

This document serves as the UM workplace expectations and guidelines for staff that are on-campus in regard to management of COVID-19 risk mitigation. All policies, protocols, and requirements are expected to be followed and failure to do so may result in corrective action. Many of the required elements within this document are derived from the MIOSHA Emergency COVID-19 Rules issued on May 24, 2021. Employers must provide a place of employment that is free from recognized hazards that are causing, or are likely to cause, death or serious physical harm to an employee.

Guidance for academic areas is referenced in this document and those requirements are specific to those areas.


The MIOSHA home page also offers COVID-19 information specifically for workers and employers in Michigan: https://www.michigan.gov/leo/0,5863,7-336-78421_11407---,00.html.

Additionally, the State of Michigan’s Coronavirus webpage is updated daily and provides current public health and safety resources for employers, employees, and the general public https://www.michigan.gov/coronavirus/

The University communicates frequently to our employees and students, providing health and safety guidance and direction while encouraging them to stay informed by checking the following university websites and resource pages:

U-M Maize and Blue Print website: https://campusblueprint.umich.edu/guiding-principles

UM EHS COVID-19: https://ehs.umich.edu/2020/03/24/ehs-covid-19-information/

Note: These practices are intended to apply to on-campus employees only. The practices outlined in this document do not apply to employees who are working remotely although it would be prudent to follow the general guidance to minimize risk of exposure.

Environment, Health & Safety is available for consultation at 734-647-1143
About COVID-19

Symptoms of COVID-19

Infection with SARS-CoV-2, the virus that causes COVID-19, can cause illness ranging from mild to severe and, in some cases, can be fatal. Symptoms typically include cough, shortness of breath or difficulty breathing, fever or chills, repeated shaking with chills, muscle pain, headache, sore throat and new loss of taste or smell. Some people infected with the virus have reported experiencing other non-respiratory symptoms. Other people, referred to as asymptomatic cases, have experienced no symptoms at all.

According to the CDC, symptoms of COVID-19 may appear in as few as 2 days or as long as 14 days after exposure.

How COVID-19 Spreads

COVID-19 spreads when an infected person breathes out droplets and very small particles that contain the virus. These droplets and particles can be breathed in by other people or land on their eyes, noses, or mouth. In some circumstances, they may contaminate surfaces they touch. People who are closer than 6 feet from the infected person are most likely to get infected.

COVID-19 is spread in three main ways:

- Breathing in air when close to an infected person who is exhaling small droplets and particles that contain the virus.
- Having these small droplets and particles that contain virus land on the eyes, nose, or mouth, especially through splashes and sprays like a cough or sneeze.
- Touching eyes, nose, or mouth with hands that have the virus on them.

Workplace Requirements

Currently the university is expected to comply with the MIOSHA Emergency COVID-19 rules as they pertain to returning to work under a controlled set of requirements. There is no longer a prohibition on in-person work from these rules.

Each department, school or college needs to obtain permission to resume in-person work through the process developed by their reporting Executive Officer. A COVID-19 Work plan needs to be developed and maintained accordingly. Plans should address the need to change as the pandemic changes and must be updated as changes are made.

Department-specific COVID-19 Work Plan

Each department will be expected to create a departmental specific COVID-19 work plan for their area to document their COVID-19 assessment and plan. Each unit should obtain approval from their Executive Officer per their process, prior to returning to work. Templates are available on the EHS COVID-19 page for General workplaces. Research and Academic Areas have separate processes which should be followed or update plans as needed.

Remote Work

Current university policy is that all campus employees working from home will continue to do so through at least mid-summer. Employees will begin a gradual return to more on-site work in the coming months at the direction of their unit’s leaders. Continuing all work that can be done remotely will reduce the total number of individuals coming to campus which lowers the risk of infection overall. This will also allow for density reductions within the workplace to allow for proper social distancing of the on-site personnel. There are no specific density requirements in place.

Consideration for employees’ needs for computers and other items, ensuring access to departmental shared drives and programs, and ensuring that workers' new workspace will not contribute to ergonomic discomfort must be in place.

Refer to ITS Remote resource guide to aid students, staff and faculty to work or learn remotely. Refer to an EHS document regarding considerations for Ergonomics of working from home.

U-M Exposure Determination

Worker risk of occupational exposure to SARS-CoV-2, the virus that causes COVID-19, during an outbreak may vary from very high to high, medium, or lower (caution) risk. The level of risk depends in part on the type of work conducted, need for contact within 6 feet of people known to be, or suspected of being, infected with SARS-CoV-2, or requirement for repeated or extended contact with persons known to be, or suspected of being, infected with SARS-CoV-2.

MIOSHA has divided job tasks into four risk exposure levels: very high, high, medium, and lower risk and employers are required to make a determination of exposure for their staff. The following is the UM Exposure Determination:

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<th>Exposure Risk</th>
<th>Description</th>
<th>U-M Specific</th>
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| Very High Exposure Risk: | These jobs are those with high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem, or laboratory procedures. | • Health care workers performing invasive specimen collection  
• Dentists performing some aerosol-generating procedures and exams  
• Autopsy/Medical Examiners  
• COVID-19 researchers working with live SARS-CoV-2 |
|--------------------------|-------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| High Exposure Risk:      | High exposure risk jobs are those with high potential for exposure to known or suspected sources of COVID-19. | • Healthcare delivery and support staff exposed to known or suspected COVID-19 patients.  
• DPSS transport workers moving known or suspected COVID-19 patients in enclosed vehicles.  
• Police Officers  
• Staff members responsible for cleaning area where COVID positive individuals were occupying |
| Medium Exposure Risk:    | These jobs include those that require frequent and/or close contact (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 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). | • Cashiers  
• Receptionists  
• Customer Service  
• Transit Operators  
• Maintenance & Trades personnel that perform essential work tasks that require close contact.  
• Trainer staff that need to interact directly with athletes.  
• Day care staff that must have contact with children (e.g. Infants/toddlers)  
• Faculty/Instructors of lab/studio courses where interaction is needed.  
• Researchers conducting human subjects research where they are unable to maintain >6ft distance.  
• Clinicians (Psychologists, Social Workers and Speech Language Pathologists) unable to maintain >6 ft. with clients who may not be able to wear face coverings. |
| Lower Exposure Risk      | 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 (within six feet) with the general public. Workers in this category have minimal occupational contact with the public and other coworkers. | Includes all individuals that can perform job duties maintaining social distancing. Includes:  
• Office/Admin personnel  
• Staff performing research  
• Custodians  
• Delivery personnel |
Measures must be put into place to minimize worker exposures to SARS-CoV-2 based on an employee exposure determination. See the table below and refer to Appendix A for further information. Details of additional requirements based on exposure determination should be included in your departmental COVID-19 work plan. Non-routine tasks can be handled separately through a risk assessment process as well.

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<th>Exposure Determination</th>
<th>Workplace Controls</th>
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| Lower Exposure Risk    | ✓ Implement all Workplace Requirements  
                          ✓ Implement all Health & Safety Guidance  
                          ✓ Require Use of Face Coverings when in indoor public spaces |
| Medium Exposure Risk   | ✓ Above items, plus:  
                          ✓ Install physical barriers, such as clear plastic sneeze guards, where feasible  
                          ✓ If public interaction is necessary, require face coverings to be worn.  
                          ✓ Consider strategies to minimize face-to-face contact (e.g., phone-based communication, telework).  
                          ✓ Conduct a Risk Assessment to determine the need for additional PPE or other controls. Contact EHS for assistance. |
| High or Very Exposure Risk | ✓ Above items, plus:  
                          ✓ Ensure appropriate air-handling systems are installed and maintained in healthcare facilities. CDC recommends that patients with known or suspected COVID-19 should be placed in an airborne infection isolation room.  
                          ✓ For postmortem activities, use autopsy suites or other similar isolation facilities when performing aerosol-generating procedures on the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death.  
                          ✓ Use special precautions associated with Biosafety Level 3 when handling specimens from known or suspected COVID-19 patients.  
                          ✓ Develop and implement policies that reduce exposure, such as cohorting (i.e., grouping) COVID-19 patients when single rooms are not available.  
                          ✓ Post signs requesting patients and family members to immediately report symptoms of respiratory illness on arrival at the healthcare facility and use disposable face masks.  
                          ✓ Consider offering enhanced medical monitoring of workers during COVID-19 outbreaks.  
                          ✓ Ensure that psychological and behavioral support is available.  
                          ✓ Conduct a Risk Assessment to determine the need for additional PPE or other controls. Contact EHS for assistance. |
COVID-19 Daily Self-Screening Protocols

All employees should be reminded that they are required to stay home if they are feeling sick or if at work, they should leave immediately if they begin to feel unwell. If they need to remain at work for a period of time before going home, an area with closable doors should be dedicated to isolate the ill individual from other co-workers. Sick leaves policies have been updated to ensure they are flexible and consistent with public health guidelines and posted on the University Human Resources COVID-19 website. The university is prohibited from discharging, disciplining or otherwise retaliating against employees who stay home or who leave work when they are at particular risk of infecting others with COVID-19.

Each day, all employees or contractors of our campus community who will enter campus buildings will be required to check themselves for COVID-19 symptoms by answering a brief set of questions. The ResponsiBLUE, our daily symptom checker tool, should be used to meet this required surveillance and it can also be completed on a desktop computer. For more information on ResponsiBLUE, click here. Other means of obtaining this information such as through us of time clocks, paper methods, etc. are also allowable if the questions are consistent and records are able to be maintained. Alternatively, this form can be used.

Requiring the use of the ResponsiBlue app for those coming onto campus and maintaining records of this data satisfies the requirements of the MIOSHA Emergency Rules which requires recordkeeping for six months. Centrally the aggregate reports will be viewed to gauge usage, thus units do not need individual data to verify compliance. Units can do periodic spot checks in the workspace, if desired.

University of Michigan Occupational Health Services (OHS) has established a COVID-19 hotline at 734-764-8021 (select prompt 1) to manage and triage employees for testing and tracking as required. The current hours (subject to change) are everyday from 7:00 AM to 5:00 PM. After regular hours, employees are instructed to leave a message for a return call within 24 hours.

All university employees are encouraged to report symptoms through this mechanism and all employees are required to report if they have been tested positive for COVID-19 if they seek testing through another source. Students, faculty and staff on the Ann Arbor campus, including Michigan Medicine, who have tested positive for COVID-19 within the past 90 days outside of U-M—that is, outside University Health Service (UHS), Occupational Health Services (OHS), or the Community Sampling and Tracking Program (CSTP)—are asked to report their positive test result here.

COVID-19 Positive Cases, Contact Tracing and Employee Notification

Employees working on campus should utilize OHS for testing when symptomatic or notified of a workplace close contact exposure. Employees that test positive for COVID-19 will be notified by OHS and provided guidance for self-isolation. Contact tracing and Employee Notification will be coordinated between OHS, University Health Service (UHS) and EHS. When an employee is identified with a confirmed case of COVID-19, the local health department and any co-workers, contractors or suppliers who may have come in contact with the individual will be notified within 24 hours of case investigation completion.

Contact Tracing is a public health tool that has been used for decades to identify people who have come in contact with an SARS-CoV-2 positive individual in an attempt to reduce the spread of a disease. It will be used at the University of Michigan to:

- Alert coworkers who may have been in close contact of the potential exposure;
• Identify localized outbreaks and ultimately control the spread of illness across campus.

Medical confidentiality and privacy will be maintained. Contacts will only be told they have been exposed to a positive case, but the identity of that case will NOT be directly revealed. Sensitivity to individual situations will be maintained.

Employees with a confirmed or suspected case of COVID-19 can return to the workplace only after they are no longer infectious according to the latest guidelines from the Centers for Disease Control and Prevention (“CDC”). The local health department and OHS will provide guidance about returning to work.

Refer to the COVID-19 Exposure, Testing and Mandatory Contact Tracing Guidance for Non-Lab Employees and Supervisors for more information on the process.

**Vendors, Contractors and Visitors**

Screening protocols that are required for areas must also include contractors. They must use the guest version of ResponsiBLUE (guest.responsiblue.umich.edu) whenever they come to campus and be prepared to show verification if requested. Alternatively, this form can be used and maintained by the department for up to six months.

Contractors working on U-M construction projects will have their own screening protocols which are verified internally through EHS. Contractors or vendors coming into units to conduct work on equipment under the direction of a department or unit should be screened. U-M Facilities and Operations personnel are required to conduct daily screenings as well.

Short-term visitors such as delivery personnel, suppliers, etc. are not required to perform screening.

Vendors, suppliers, contractors, etc. must follow their company COVID-19 Preparedness and Response plan and must wear face coverings per U-M policy. Some locations do not allow a personal face covering and in those areas, all that enter will be provided a face covering for use during visit.

Any outside entity must notify their university contact if they or a member of their team has a confirmed COVID-19 cases that occurs within 14 days of their last day on campus. If a confirmed case occurs in a building or a worksite, EHS will conduct contact tracing and notify medium and high risk exposure individuals, including contractors within 24 hours of notification.

**Training**

All employees on-site are required to take SARS-Cov2 and COVID-19 Training that at a minimum covers the following:

• Workplace infection-control practices, including information on vaccinations available for COVID-19.
• The proper use of personal protective equipment.
• Steps the employee must take to notify the university of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
• How to report unsafe working conditions.

Below are training modules available in My LINC:

EHS_OHS_COVIDw COVID-19: Working Safely at U-M
To view COVID-19 training completions for your area using our interactive dashboard, please contact SafetyTraining@umich.edu to request access.

**COVID-19 Safety Coordinator**

Each department must designate one or more supervisors (also known as worksite COVID-19 safety coordinator) to implement, monitor and report on the department specific COVID-19 plan.

COVID supervisor/coordinator is responsible for:

1. Reading and understanding the U-M COVID-19 Preparedness & Response Plan
2. Making sure all elements of the Departmental Specific COVID Work Plan are implemented and then understood/followed by employees.
3. Having the authority to implement and enforce the Work Plan.

**Travel Restrictions**

All international and domestic business travel by faculty and staff on behalf of the University of Michigan is suspended until further notice. More details about U-M travel restrictions and guidance can be found on the Global Michigan website, which will be updated to reflect changes. Information for students traveling back to campus in the fall will be posted in the near future.

Persons not on University business traveling internationally by air must meet CDC requirements before returning to the United States.

- CDC Returning From International Travel Order (effective Jan 26, 2021, updated May 19th, 2021)

Before returning to the United States, passengers, including US citizens and fully vaccinated people, returning from international air travel are required to:

- Provide proof of a negative COVID-19 test no more than 3 days before returning by air to the United States
- Documentation of having recovered from COVID-19

After returning to the United States from International travel the CDC recommends:

- Fully Vaccinated Travelers:
  - Get tested 3-5 days after travel AND self monitor for symptoms

- Not Vaccinated Travelers:
  - Stay home to self-quarantine for 7 days after travel.
  - Even if you test negative, stay home to self-quarantine for the full 7 days.
  - If you don't get tested, it's safest to stay home to self-quarantine for 10 days after travel.
Always follow [state and local recommendations](https://travel.state.gov) or requirements related to travel.

- U.S. Department of State (DOS) travel advisories: [travel.state.gov](https://travel.state.gov)
Health & Safety Measures

Protecting workers from exposure to SARS-CoV-2 is dependent on requiring basic infection prevention measures to be in place. The following are required practices that must be part of all workplace plans and enforced as standard practices for workplace health and safety. COVID-19 Signage and Floor markings is available for download and purchase and Plexiglas shields and partitions are available for purchase.

Signage
Posters should be placed that encourage staying away from the workplace when sick, cough and sneeze etiquette and proper handwashing.

Face-coverings
U-M requires all students, staff, faculty, and visitors (including those that are vaccinated) to wear a face covering that covers the mouth and nose on U-M property (including the Ann Arbor, Dearborn and Flint campuses as well as properties off campus). This includes when inside buildings, on U-M transportation, participating in organized contact sports, and when outdoors in gatherings of 100 or more. View the entire policy at University of Michigan Face Covering Policy for COVID-19.

Per CDC guidance, the use of face coverings with exhalation valves is not permitted on campus and a face shield cannot be used in lieu of a face covering.

Individuals can provide their own face coverings if they desire; however, departments are responsible for providing non-medical grade face coverings to employees. U-M Procurement has additional guidance available on face covering purchases.

Respiratory Etiquette
Individuals should be reminded to always cover their cough or sneeze with a tissue or the inside of their elbow, throw away all tissues and immediately wash their hands with soap and water for 20 seconds or use hand sanitizer that contains at least 60% alcohol.

Social Distancing
Keeping adequate spacing between yourself and others is one of the most important behaviors that can minimize your risk of being exposed to SARS-CoV-2 virus. Remember that some people without symptoms may be able to spread virus so it is important to stay at least 6 feet (about 2 arms’ length) from other people. Casual conversations and interactions should be limited.

Work should be conducted in a manner that 6 ft of distancing is maintained to the maximum extent feasible. The use of ground markings, signs and physical barriers should be used as appropriate in the workplace.

If work tasks are not feasible to maintain 6ft distancing, EHS can assist with a risk assessment for tasks.

Handwashing
Frequent and thorough hand washing with soap and water for at least 20 seconds especially after an individual has been in a public place or after sneezing, coughing, blowing your nose or touching one’s face must be followed
stringently. Workplaces should be provided with adequate access to handwashing facilities. Paper toweling is preferred over hand drying machines. If soap and running water are not immediately available, provide alcohol-based hand rubs containing at least 60% alcohol. Refer to the CDC video on Proper Handwashing for more details on technique. Placement of hand sanitizer stations can present an issue with egress, refer to EHS guidance on Placement of Alcohol Based Hand Sanitizer in Non-Healthcare Facilities.

**Personal Protective Equipment (PPE)**

Glove use is necessary for healthcare professionals, food industry workers and individuals performing cleaning duties or other job tasks that require gloves as a standard part of their PPE. In most other situations wearing gloves is not necessary and departments should focus on promoting frequent handwashing in lieu of general use of gloves as a control strategy for COVID-19 prevention.

Similarly, individuals do not need to wear goggles, safety eyewear or face shields for general activity on campus for COVID-19 prevention. Normal job tasks that require the use of this PPE from a safety or workplace requirement perspective should continue to be followed.

**Cleaning and Disinfection**

Custodial teams across campus have increased their cleaning frequency of high-touch surfaces in common spaces to meet current CDC guidelines. Building occupants should also perform additional cleaning of high-touch surfaces and shared equipment within their work areas not performed by custodial teams. Additional cleaning and disinfection guidance from the CDC can be found here.

Each department is responsible for ensuring that employees have access to cleaning and need to be provided time for hand-washing and cleaning as necessary.

In the event an employee tests positive for COVID-19 in the workplace, supervisors are expected to contact EHS for further guidance. EHS protocols are in place to evaluate the situation and determine the need for additional cleaning and disinfection of the worksite.
Guidance for Specific Areas

On-Campus Vehicle Usage

For those employees that utilize university vehicles or personal vehicles for their work on campus, use should be restricted to no more than one person per vehicle, if feasible. If more than one person per vehicle is unavoidable, all individuals must wear face coverings and windows should be open. Also if work vehicles are not dedicated to a specific individual for their exclusive use, departments must ensure disinfection occurs after each use. For trips off-campus, a risk and needs assessment should be completed.

Public Transportation

Many workers rely on city or university bus travel for their commute as well as their daily travel across campus. Per the State of Michigan Safe Start guidance for K-12, CDC guidance and internal recommendations, U-M Logistics, Transportation and Parking has implemented the following recommendations:

- Placement of hand sanitizer where feasible for riders upon entering the bus.
- Entry and Exit through the rear doors with exception for those needing accessible entry
- Requirement to wear face coverings while on the bus and signage posted.
- Daily cleaning and disinfection of busses
- Weather permitting, keeping windows open while the vehicle to increase air circulation
- Limit trip duration to 15 minutes or less.

Individuals should social distance at bus stops and as soon as possible after-disembarking, wash their hands or use alcohol-based hand sanitizer with greater than 60% alcohol.

Corridors and Stairwells and Elevators

As the primary means of circulation, these areas will be open for circulation throughout the buildings. Individuals should not linger in hallways and stairwells in order to minimize periods of contact with others, and reduce congestion.

Momentarily passing by another person does not significantly increase an individuals’ risk and is not considered “close contact.” Other visual cues (floor decals, tape) can be used to indicate usable spaces and help maintain the required 6 foot physical distancing between occupants.

Restrooms

Physical distancing of 6 feet should be maintained while in restrooms. There is no need for occupancy indicators, but signage can be added to direct individuals to the locations that have additional bathrooms if the particular one is crowded. Per code requirements, sinks, stalls or urinals should not be blocked from use. No modifications to university toilets are required or deemed necessary.

For areas with doors, place a trash can by the door for those that wish to use paper towel when using the handle. The trash can should not impede egress. Paper toweling for hand drying is preferred over air dryers, but air dryers are allowable.

Atrium/Common Spaces
Atriums and common spaces may not be used for congregating, but these areas can be repurposed as spaces for individuals that do not have an alternate location to take breaks or eat their meals. Social distancing is required as is cleaning and disinfection between individuals. Cleaning and disinfection supplies should be made available.

**Conference Rooms/Huddle Rooms/Training Rooms**

Meetings and training sessions should be conducted remotely using phone or video conferencing (zoom, google meet, blue jeans, etc.) if possible. Even while working on campus, employees should communicate as needed by email, instant message, telephone or other available technology rather than face-to-face.

Conference, huddle, and training rooms should be limited to a maximum occupancy of 144 square feet per person. Use signage, tape off, or stack chairs (if feasible) that should not be used, in order to maintain six feet between people. Conference rooms can also be considered for use to expand work/desk space if needed. Conference rooms that are used should be disinfected on a daily basis at minimum. Materials can be left in the room and employees should clean their surface and equipment used.

**Guidelines for Research Facilities**

The Office of Research developed guidance for the activation of laboratory, studio and field research. and the [U-M Office of Research COVID-19 Research Reengagement website](https://research.umich.edu/covid-19) for additional details.
Building-wide Considerations

Ventilation

Increasing ventilation can help minimize exposures in workspaces. Although the SARS-CoV-2 virus is thought to primarily be spread through person-to-person contact, increasing ventilation within a system’s operating parameters can be part of a strategy for workplaces. Refer to HVAC Guidelines for University of Michigan Facilities.

Building Water Management

As many buildings on campus were at reduced building occupancy, a potential exists for stagnant water due to lowered or no use. Stagnant water can result in iron deposit, sediment formation, bacterial growth, heavy metal contamination, and aesthetic concerns such as discolored water with objectionable tastes and smells. Frequent flushing of building water lines can reduce these issues. Therefore a routine flushing program is recommended to prevent building water problems. Facilities & Operations is managing this for the campus buildings that they serve following an established protocol. Other areas should consider flushing in the building by running all sources of water for several minutes before use.

Drinking fountains, water coolers, coffee stations

Drinking fountains, water coolers, coffee stations and other shared equipment should either have reminders about proper hand washing and cleaning/disinfection for shared items. Departments should supply materials for cleaning and disinfecting these items. Adopting best practices such as using touchless refillable water bottle stations or bringing your own water bottle instead of using shared equipment are encouraged. Ice machines that require a handheld scoop should not be used, as it is difficult to control potential contamination.
Unit-specific Workplace Requirements

These additional requirements are imposed per the current MDHHS June 1, 2021 Gatherings and Face Mask Order which specifies additional requirements for certain industries. The basic requirements covered in this document apply to all areas of employment and must also be followed.

Establishments (Business, store, office, government office, school, organized event, public transit service, or other public or private operation or facility where gatherings may occur).

- Indoor gatherings are permitted at establishments only if occupancy does not exceed the greater of:
  - 50% of the limits established by the State Fire Marshal or a local fire marshal (or 30 persons per 1,000 square feet if no applicable fire marshal limit exists); or
  - 25 persons
- Does not apply to the following:
  - Workplace gatherings that occur consistent with the Emergency Rules issued by MIOSHA on October 14, 2020, and subsequently extended or replaced;
  - Voting or official election-related activities;
  - Education and support services at public, nonpublic, and boarding schools, colleges, and universities;
  - Children in a child care organization, after school program, or camp setting;
  - Persons traveling on a school bus or public transit;
  - Gatherings for the purpose of medical treatment, including mental health and substance use disorder support services;
  - Residential care facilities, which are subject to the March 17, 2021, epidemic order entitled "Requirements for Residential Facilities," or any replacement of that order;
  - Gatherings for public health or other emergency purposes

Organized Sports

- Gatherings for the purpose of sports practice and competition involving persons ages 13 to 19 are prohibited unless all such persons comply with a testing program as specified in the MDHHS publication entitled “Interim Guidance for Athletics” issued May 24, 2021.
- For gatherings where the sports organizer has determined that it would be unsafe for indoor sport participants to wear a mask, participants who are not fully vaccinated persons must be tested consistent with the MDHHS publication entitled “Interim Guidance for Athletics” issued May 24, 2021.

Food Service Establishments

- Gatherings are prohibited at indoor food service establishments unless the establishment maintains accurate records, including date and time of entry, names of patrons, and contact information, to aid with contact tracing.
Appendix A: Workplace control examples

Occupational safety and health professionals use a framework called the “hierarchy of controls” to select ways of controlling workplace hazards. In other words, the best way to control a hazard is to systematically remove it from the workplace, rather than relying on workers to reduce their exposure.

During a COVID-19 outbreak, when it may not be possible to eliminate the hazard, the most effective protection measures are (listed from most effective to least effective): engineering controls, administrative controls, safe work practices (a type of administrative control), and PPE. There are advantages and disadvantages to each type of control measure when considering the ease of implementation, effectiveness, and cost. In most cases, a combination of control measures will be necessary to protect workers from exposure to SARS-CoV-2.

Engineering Controls

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:

- Increasing ventilation rates in the work environment.
- Installing physical barriers, such as clear plastic sneeze guards.
- Specialized negative pressure ventilation in some settings, such as for aerosol generating procedures (e.g., airborne infection isolation rooms in healthcare settings).

Examples of engineering controls implemented on campus include the following:

- Bus Partitions to create a physical barrier of separation of 6 feet between the bus driver and passengers
- Isolation rooms that provide one-pass air to reduce the need for higher level PPE in the general room area.
- Experimental helmet apparatus for COVID patient use to provide HEPA exhausted enclosure around the patient to eliminate need for upgraded PPE during certain procedures.

Administrative Controls

Administrative controls require action by the worker or employer. Typically, administrative controls are changes in work policy or procedures to reduce or minimize exposure to a hazard. Administrative controls for SARS-CoV-2 include:

- Minimizing contact among workers by replacing face-to-face meetings with virtual communications and implementing telework, if feasible.
- Establishing alternating days or extra shifts that reduce the total number of employees in a facility at a given time, allowing them to maintain distance from one another while maintaining a full onsite work week.
- Developing emergency communications plans, including a forum for answering workers’ concerns and internet-based communications, if feasible.
- Providing workers with up-to-date education and training on COVID-19 risk factors and protective behaviors (e.g., cough etiquette and care of PPE).
- Training workers who need to use protecting clothing and equipment how to put it on, use/wear it, and take it off correctly, including in the context of their current and potential duties.
Safe Work Practices

Safe work practices are types of administrative controls that include procedures for safe and proper work used to reduce the duration, frequency, or intensity of exposure to a hazard. Safe work practices for SARS-CoV-2 include:

- Providing resources and a work environment that promotes personal hygiene. For example, provide tissues, no-touch trash cans, hand soap, alcohol-based hand rubs containing at least 60 percent alcohol, disinfectants, and disposable towels for workers to clean their work surfaces.
- Requiring regular hand washing or using of alcohol-based hand rubs. Workers should always wash hands when they are visibly soiled and after removing any PPE.
- Post handwashing signs in restrooms.
- Practicing social distancing.

Personal Protective Equipment (PPE)

While engineering and administrative controls are considered more effective in minimizing exposure to SARS-CoV-2, PPE may also be needed to prevent certain exposures. While correctly using PPE can help prevent some exposures, it should not take the place of other prevention strategies.

Examples of PPE include: gloves, goggles, face shields, face masks, and respiratory protection, when appropriate. During an outbreak of an infectious disease, such as COVID-19, recommendations for PPE specific to occupations or job tasks may change depending on geographic location, updated risk assessments for workers, and information on PPE effectiveness in preventing the spread of COVID-19.

The University of Michigan Personal Protection Equipment Program provides additional detail regarding hazard assessment, selection, maintenance and use of required PPE.

Employers are obligated to provide their workers with PPE needed to keep them safe while performing their jobs. The types of PPE required during a COVID-19 outbreak will be based on the risk of being infected with SARS-CoV-2 while working and job tasks that may lead to exposure.

Current required respirator usage for COVID-19 protection on Campus:

- Workers, including those who work within 6 feet of patients known to be, or suspected of being, infected with SARS-CoV-2 and those performing aerosol-generating procedures, need to use respirators that are National Institute for Occupational Safety and Health (NIOSH)-approved, N95 filtering facepiece respirators or better and follow the University of Michigan Respiratory Protection Plan. Respirators must be used in the context of a comprehensive, written respiratory protection program that includes fit-testing, training, and medical exams. Surgical N95 respirator will be used when both respiratory protection and resistance to blood and body fluids is needed.
- N95 filtering facepiece respirators are required for DPSS transport of suspected COVID-19 individuals.
- PAPRs may be required to be worn by Hospital maintenance personnel if entering a room with a known or suspected to be COVID-19 patient during or within one hour of an aerosolization procedure.
- N95 respirators are worn during COVID-19 research if work may generate aerosols or other risk of exposure.
- Face shields may also be worn on top of a respirator to prevent bulk contamination of the respirator.

Appendix B: Record of Significant Updates
<table>
<thead>
<tr>
<th>Date</th>
<th>Additions/Modifications</th>
</tr>
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</table>
| 6/22/20   | ▪ Added Appendix C to track changes  
▪ Added UM Health Screen URL  
▪ Added EHS Hand Sanitizer Guidance, Stairway Guidance, and Water Quality document  
▪ Added Training Link for Human Subject Research and Link to Tiers under Research section  
▪ Added a link for Risk Assessment Document  
▪ Added UM Maize and BluePrint website.                                                                                                               |
| 6/23/20   | ▪ Updated info on signage and corrected broken links, errors                                                                                                                                                             |
| 6/29/20   | ▪ Removed intro language about virus origins  
▪ Added links to supplement info on daycare, gyms, libraries, museums, etc.  
▪ Added links for human subject research                                                                                                                                 |
| 7/8/2020  | ▪ Changed maximum capacity to 50% from 30% as a goal in staffing management based on guidance from Provost’s committee.                                                                                               |
| 7/10/2020 | ▪ Updated UM Travel Policy Info                                                                                                                                                                                        |
| 7/23/2020 | ▪ Added sentence regarding students to introduction  
▪ Added COVID-19 Supervisor duties  
▪ Added link to U-M Health Screen to screening section  
▪ Updated language for Elevators, Corridors and Stairwells, and Restrooms to match Provost guideline document.  
▪ Added section on Academic Areas  
▪ Moved Research information under Academic area information  
▪ Changed section heading to “Guidance for Specific Areas”  
▪ Added section for Building-wide considerations for HVAC, water management and drinking fountains/water coolers and coffee stations. |
| 7/27/2020 | ▪ Added training report information                                                                                                                                                                                    |
| 8/26/2020 | ▪ Updated screening info for ResponsiBlue  
▪ Updated OHS hotline hours  
▪ Updated info for on-campus vehicle use and bus transportation.  
▪ Added info on exhalation valved masks and face shields                                                                                                                                                     |
|           | ▪ Added info for new training dashboard access                                                                                                                                                                          |
| 11/16/2020| ▪ Updated reference from Executive Orders to MIOSHA Emergency Rules as the authoritative reference for requirements.  
▪ Deleted items that are no longer required by the new rules.                                                                                           |
<table>
<thead>
<tr>
<th>Date</th>
<th>Changes</th>
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<tbody>
<tr>
<td>1/29/2021</td>
<td>• Added link to a paper form that can be used to document daily entry</td>
</tr>
<tr>
<td></td>
<td>screening for employees if Responsiblue is not used.</td>
</tr>
<tr>
<td></td>
<td>• Added specific references as required by MDHHS Emergency Rules on</td>
</tr>
<tr>
<td></td>
<td>Gatherings and Face Mask Order</td>
</tr>
<tr>
<td></td>
<td>• Added updated specific references as required by MDHHS Emergency</td>
</tr>
<tr>
<td></td>
<td>Rules on Gatherings and Face Mask Order</td>
</tr>
<tr>
<td></td>
<td>• Added additional Unit-Specific Workplace Requirements per MIOSHA</td>
</tr>
<tr>
<td></td>
<td>• Updated CDC Guidance for Returning from International Travel</td>
</tr>
<tr>
<td>2/23/2021</td>
<td>• Added updated specific references as required by MDHHS Emergency</td>
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<tr>
<td></td>
<td>Rules on Gatherings and Face Mask Order Effective 2/4/2021- 3/29/2021</td>
</tr>
<tr>
<td></td>
<td>• Added additional Unit-Specific Workplace Requirements per MIOSHA for</td>
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<tr>
<td></td>
<td>Restaurants and Indoor Dining</td>
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<tr>
<td>3/3/2021</td>
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<td>Rules on Gatherings and Face Mask Order Effective 3/5/2021- 4/19/2021</td>
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<td>6/1/2021</td>
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<td>• Removed specific references as required by the MIOSHA Emergency Rules</td>
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<tr>
<td></td>
<td>• Updated the Ways COVID-19 Spreads according to the latest CDC guidance</td>
</tr>
<tr>
<td></td>
<td>published on May 13, 2021.</td>
</tr>
<tr>
<td></td>
<td>• Updated recordkeeping requirements for all employers per MIOSHA</td>
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<tr>
<td></td>
<td>Emergency Rules Coronavirus Disease 2019 (COVID-19) issued on May 24,</td>
</tr>
<tr>
<td></td>
<td>2021.</td>
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<tr>
<td></td>
<td>• Updated training requirements for all employers MIOSHA Emergency Rules</td>
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</tbody>
</table>
- Updated Face Covering Guidance per U-M Face Covering Policy
- Appendix A Removed - Duplicate of U-M Exposure Determination already in body of document.
- Updated International Travel Order per revised CDC guidelines
- Removed occupant density guidance.
- Updated Cleaning and Disinfection guidance in response to the latest CDC guidance published on April 5, 2021.