

COVID-19 Preparedness & Response Plan

General

The following COVID-19 preparedness and response plan has been established for Western Michigan University Homer Stryker M.D. School of Medicine (WMed) in accordance with the requirements in the [Michigan Department of Labor and Economic Opportunity MIOSHA Emergency Rules](#), the [OSHA Guidance on Preparing Workplaces for COVID-19](#), and the latest [guidance](#) from the US Centers for Disease Control and Prevention (CDC). The purpose of this plan is to minimize or eliminate employee and learner exposure to SARS-CoV-2.

The MIOSHA rules, OSHA guidance, and CDC guidance for COVID-19 have general safeguards applicable for all workplaces and specific safeguards for certain industries. The WMed Rapid Response Team has read these guidance documents carefully, found the safeguards appropriate to WMed based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

As the COVID-19 situation evolves, the emergency rules and CDC guidance are periodically updated. The Rapid Response Team is responsible for visiting the MIOSHA, OSHA, and CDC guidance webpages regularly (for example, weekly) for the latest information and for revising the plan as necessary. This plan reflects the guidance as of June 23, 2021.

WMed has designated all leaders who serve in a supervisory role to implement, monitor, and report on the COVID-19 control strategies developed in this plan. Designated supervisors will remain on-site at all times when employees or learners are present. An on-site employee may be designated to perform the supervisory role within a specific department or administrative unit, if necessary.

The plan is made readily available to employees and learners via the *WMed Coronavirus Response* webpage on the institutional website at <https://med.wmich.edu/coronavirusresponse>.

Exposure Determination

Due to the nature of the work provided by WMed including medical education, patient care, and research, the Rapid Response Team has determined that its employees' jobs fall into all three exposure risk categories as defined by the OSHA Guidance on Preparing Workplaces for COVID-19:

1. **Lower Exposure Risk Jobs.** These jobs do not require contact with known or suspected cases of COVID-19 nor frequent close contact (for example, within six feet) with the general public. Workers in this category have minimal occupational contact with the public and other coworkers.
2. **Medium Exposure Risk Jobs.** These jobs are those that require frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients.
3. **High Exposure Risk Jobs.** These jobs are those that require frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, who are known or suspected COVID-19 patients.

Engineering Controls

WMed has implemented feasible engineering controls to minimize or eliminate employee and learner exposure to SARS-CoV-2. Engineering controls involve isolating individuals from hazards using ventilation and other engineered solutions. In environments where they are appropriate, these types of controls reduce exposure to hazards without relying on individual behavior and can be the most cost-effective solution to implement. The Director of Facilities is responsible for seeing that the correct engineering controls are chosen, installed, maintained for effectiveness, and serviced when necessary. The following engineering controls have been implemented:

1. Installation of plexiglass barriers at all registration, reception, security desks, and podiums.
2. Increasing the amount of ventilation and air exchange in all facilities with consistent monitoring in place.
3. Separation of chairs in patient waiting areas to promote social distancing.
4. Floor markers for social distancing are used at patient care facility entrances, elevators, and registration desks.
5. The WMed Fitness Center was reopened on September 21, 2020 with new rules and a scheduling process to support the health and safety of all patrons.

Administrative Controls

Administrative controls are policies, procedures, and practices that minimize or eliminate individual exposure to the hazard. The Rapid Response Team is responsible for seeing that the correct administrative controls are chosen, implemented and maintained for effectiveness.

The following administrative controls have been established and implemented for WMed:

1. Employees and learners are required to stay home when sick, and to report signs and symptoms to Occupational Health.
2. Voluntary COVID-19 testing is available to all employees and learners (with or without symptoms).
3. Policy *IC12 Employee and Student Restrictions for Infectious Diseases* has been undated to include COVID-19 information and a new Fit for Duty Attestation that is required by all employees and learners.
4. For non-vaccinated individuals social distancing (at least six feet) is to be maintained whenever possible.
5. Individuals are encouraged to use the stairs instead of elevators to avoid crowding.
6. Non-vaccinated individuals should sit at least six feet apart when eating in designated eating areas.
7. Policy *HR95 Working Remotely* provided for employees to temporarily work remotely when extraordinary circumstances require it. This policy has been revised to be the *Flexible Working Solutions* policy that allows employees to return to work in person while also having flexible scheduling options to work from home if deemed appropriate.
8. Face-to-face meetings occur but remote options are offered. Microsoft Teams, phone, and email are primary sources for communication and learning.
9. Visitor (guests, suppliers, vendors, etc.) access at all facilities is permitted as of June 23, 2021. Visitors must attest to COVID-19 symptoms prior to entry and non-vaccinated visitors must wear a face mask and practice social distancing.
10. Sharing of tools, equipment, and items is discouraged.
11. Individuals in clinical settings are provided with appropriate personal protective equipment (PPE) and non-medical grade face masks (cloth face coverings) are provided to all individuals in non-clinical settings.
12. Non-vaccinated individuals are required to wear a face mask at all times except when alone in a room with the door closed or when eating or drinking in a designated eating area. Face masks are required for all individuals in a healthcare setting.
13. Patients are screened at the entrance of clinical facilities, informed about symptoms of COVID-19, and potential COVID-19 patients use telehealth services and curbside testing services.
14. A separate patient entrance and isolation rooms are available for suspected or confirmed COVID-19 patients.
15. All individuals are provided with access to hand sanitizer, tissues, and trash receptacles.
16. Telehealth services are available if patients request it.
17. All are encouraged to follow proper cough and sneeze etiquette, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands.
18. Sick leave policies are flexible and consistent with public health guidance, so employees and learners do not come to WMed sick.
19. Occupational Health documents and confirms employee and learner illness.
20. Family leave and paid time off policies permit employees to stay home to care for a sick family member.
21. Signage and consistent internal communication are used to prompt individuals to follow all safety guidelines.

Hand Hygiene

The Infection Control Committee is responsible for seeing that adequate handwashing facilities are available in the facilities and that regular handwashing is required. Frequency of such handwashing is determined in part by factors such as when and how often the individuals' hands are potentially exposed to SARS-CoV-2. When handwashing facilities are not available, WMed shall provide individuals with antiseptic hand sanitizer. WMed will provide time for individuals to wash hands frequently and to use hand sanitizer.

Disinfection of Environmental Surfaces

WMed has increased 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. WMed makes cleaning supplies available to employees and learners at all facilities.

The Director of Facilities is responsible for seeing that environmental surfaces are cleaned and disinfected. Frequency of such disinfection is 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, WMed consults 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 are strictly adhered to.

WMed will perform enhanced cleaning and disinfection after persons confirmed to have COVID-19 have been in a work or learning area. In the interim, that area will be temporarily closed, and individuals will be sent home or relocated. Occupational Health is responsible for seeing that this protocol is followed. In all clinical settings, the appropriate CDC-approved disinfection protocols are followed with enhanced terminal cleaning of patient waiting areas on a daily basis. Sick and well areas are designated in all waiting rooms. In research labs, additional cleaning protocols are in place as well as audit and compliance procedures.

Personal Protective Equipment (PPE)

WMed provides employees and learners with personal protective equipment for protection from SARS-CoV-2 appropriate to the exposure risk associated with the job or learning environment. The PPE policy follows the CDC and OSHA guidance applicable to the industry and types of jobs at the workplace and is in accordance with latest EOs. All types of PPE are to be:

- Selected based upon the hazard to the individual.
- Properly fitted and periodically refitted as applicable.
- Consistently and properly worn.
- Regularly inspected, maintained, and replaced, as necessary.
- Properly removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, others, or the environment.

PPE use and cleaning are based on CDC guidelines and have been approved by the Infection Control Committee.

WMed will provide one reusable, non-medical grade face mask (cloth face coverings) to each non-clinical employee and learner. One surgical mask per day will be provided for individuals working or learning in a clinical setting. Face shields are not necessary for individuals in the non-clinical setting, but individuals can bring their own.

Health Surveillance

WMed has implemented a screening protocol to identify known or suspected cases of COVID-19 among employees and learners and isolate them from the remainder of the medical school community. Occupational Health is responsible for ensuring that all required health surveillance provisions are performed. Each time an employee, learner, contractor, or visitor enters a WMed facility, they must complete a health self-screening that includes the following:



Employees, Students, and Visitors

The health and safety of you and our WMed community is very important.

Health Screening: You must answer the following questions before entering this facility.

1. Do you have any of the following signs or symptoms?

- Fever, defined as temperature over 100.4° F (or 38°C)
- Chills
- Cough
- Shortness of breath or difficulty breathing
- Fatigue
- Muscle or body aches
- Headache
- New loss of taste or smell
- Sore throat
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea
- Symptoms or indications of a communicable disease

2. Did you provide care or have close contact with a person with probable or confirmed COVID-19 while they were ill, and you did not wear appropriate PPE?

Employees and Students:

- If you answer **YES** to either question: **DO NOT** enter this facility. Contact Occupational Health at 337-4418 immediately.
- If you answer **NO** to both questions: By entering the facility, you are attesting to answering **NO** to both questions and that you do not pose a known risk of a communicable disease.

Visitors:

- If you answer **YES** to either question: **DO NOT** enter this facility. You should contact your healthcare provider for possible COVID-19 testing or further guidance.
- If you answer **NO** to both questions: By entering the facility, you are attesting to answering **NO** to both questions and that you do not pose a known risk of a communicable disease.

Employees and learners have been directed to promptly report any signs and symptoms of COVID-19 to Occupational Health. WMed has provided employees and learners with instructions for how to make such a report including calling or emailing Occupational Health at (269)337-4418, x6338, x4449, pager (269)232-5215 or occupational.health@med.wmich.edu.

WMed will physically isolate any individuals with known or suspected COVID-19 from the remainder of the workforce or campus, using measures such as, but are not limited to:

- Not allowing known or suspected cases to report to or remain at their work or learning location.
- Sending known or suspected cases to a location (for example, home) where they are self-isolating during their illness.

WMed will not discharge, discipline, or otherwise retaliate against employees or learners who stay at home or who leave work or school when they are at particular risk of infecting others with COVID-19. When an employee or learner is identified with a confirmed case of COVID-19, within 24 hours, Occupational Health will notify both the local public health department, and any co-workers, students, faculty, contractors, or suppliers who may have come into contact with the person who is the confirmed case of COVID-19. When notifying others, WMed will not reveal the name or identity of the confirmed case. WMed will allow employees or learners with a confirmed or suspected case of COVID-19 to return to the workplace or campus only after they are no longer infectious according to the latest guidelines from the CDC.

Training

The Rapid Response Team shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements. WMed will train workers and learners on, at a minimum:

1. Routes by which the virus causing COVID-19 is transmitted from person to person.
2. Distance that the virus can travel in the air, as well as the time it remains viable in the air and on environmental surfaces.

3. Symptoms of COVID-19.
4. Workplace and campus infection-control practices.
5. The proper use of PPE, including the steps for putting it on and taking it off.
6. Steps the individual must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
7. How to report unsafe working or learning conditions.

Two required online training courses were required for all employees and learners to complete by no later than July 20, 2020 or before returning to work or school. A consolidated training course is to be completed by all new hires as they start employment with WMed and all new students as part of their pre-matriculation requirements. This required education is important, and components are required by the State of Michigan, and also supports expectations from our accrediting bodies. Individuals are responsible for knowing this information.

Human Resources will create a record of the training. The record will list the names of the employees and students trained, the training date, and content of training.

Recordkeeping

WMed will maintain the following records as they relate to the COVID-19 preparedness and response plan:

1. Training records.
2. A record of daily entry self-screening results for all individuals entering the facilities, including questions covering signs and symptoms of COVID-19 and exposure to people with suspected or confirmed COVID-19.
3. When an individual is identified with a confirmed case of COVID-19, a record that within 24 hours the local public health department was notified as well as any co-workers, learners, contractors, or suppliers who may have come into contact with the person who was the confirmed case of COVID-19.

Occupational Health and Human Resources will ensure that the records are kept.

Reporting Unsafe Conditions

WMed encourages all individuals to report any safety and health concerns. The following steps are recommended to enable WMed to respond in a timely manner.

1. Notify the immediate supervisor, faculty instructor, resident program director, Human Resources, Office of Student Affairs, Office of Resident Affairs, or Occupational Health.
2. Notify the administrative director, department chair, associate dean or the dean.
3. Use the anonymous Compliance and Concern hotline at www.lighthouse-services.com/WMed or call (833)222-1416 only to remain anonymous.
4. If WMed has not responded to the concern in a timely fashion, an individual has the right to file a complaint with MIOSHA.

Promoting Psychological Safety

The WMed Wellness Ambassadors developed the following tips to promote psychological safety for all individuals:

1. **Follow guidelines** regarding mask usage and social distancing to help ensure not only collective safety and well-being but also emotional well-being.
2. **Remind others** of these results to help all find new habits for interacting safely.
3. **Be aware** that each individual may be triggered/affected by different circumstances or have different concerns about transitioning back to work or school.
4. **Be generous** in giving yourself and others a break and extending compassion – it has been and may continue to be an unprecedented time of high stress for many at WMed.
5. **Reach out** to others who may be in need, to the Employee Assistance program for individual well-being and that of family members, or to well@med.wmich.edu if there are opportunities for additional supportive activities or forums.

WMed Wellness Initiative

The wellness of all within the WMed community is paramount to our mission at the medical school. We seek to provide employees with the resources they need to support work-life balance and give our learners the tools to navigate the rigors of undergraduate and graduate medical education. [Wellness offerings and resources](#) have been and continue to be offered ongoing and with a weekly schedule through the coronavirus pandemic. A new Working and Learning From Home Tips During COVID-19 [portal page](#) is published with additional resources.