



BENTLEY COMMUNITY SCHOOL DISTRICT

COVID-19 PREPAREDNESS & RESPONSE PLAN

General

The following COVID-19 Preparedness & Response plan has been established for Bentley Community Schools ("The District") in accordance with MIOSHA Emergency Rules for Coronavirus disease 2019 (COVID-19). The purpose of this plan is to minimize or eliminate employee exposure to SARS-CoV-2.

The Emergency Rules have general safeguards applicable for all workplaces and specific safeguards for certain industries. The District has read these emergency rules carefully, developed the safeguards appropriate to Bentley Community Schools based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

The following individuals are designated as COVID-19 Workplace Coordinators/Supervisors: Dr. Kristy Spann, Superintendent and Elizabeth Buckhold, Director of Curriculum and Technology Initiatives. The Coordinators are responsible for staying abreast of federal, state, and local guidance and incorporating those recommendations into the District's workplace. The Coordinator/Supervisors are also responsible for reviewing policies and practices to make sure they are consistent with this Plan, District operations, and existing federal, state, and local requirements. They are also responsible for implementing, monitoring, and reporting on the COVID-19 control strategies that are required per Executive or Emergency Orders (EO). Please contact one of the following coordinators to report any unsafe working conditions.

Dr. Kristy Spann

Superintendent

kspann@bentleyschools.org

810.591.9120

Ms. Elizabeth Buckhold

Director of Curriculum & Media Initiatives

ebuckhold@bentleyschools.org

810.591.9123

Bentley Community Schools has designated one or more worksites supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The worksite supervisor(s) are:

- Dale Bednarski, Maintenance and Custodial Supervisor
- Tony Sell, Maintenance
- Jill Ott, Brenda Pyles, Mary Pyles, Mona Sowa, Samantha Sycamore, Laura Wetherwax-Custodians
- Debra Gooch, Principal (Barhitte Elementary)
- Christine Brockmon, Principal (Bentley Middle School)
- Justin Dickerson, Principal (Bentley High School)
- Scott Bednarski Director of Athletics (High School)
- Kristy Spann, Superintendent

The supervisor will remain on-site when employees are present on site. An on-site employee may be designated to perform the supervisory role.

The plan will be made readily available to our employees and their representatives. The plan will be made available via hard copy.

Exposure Determination

Bentley Community Schools has evaluated routine and reasonably anticipated tasks and procedures for all employees to determine whether there is actual or reasonably anticipated employee exposure to SARS-CoV-2. Bentley Community Schools has determined that its employees' jobs fall into only the lower exposure and medium exposure risk categories as defined by the OSHA Guidance on Preparing Workplaces for COVID-19:

- **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. Examples are small offices, small manufacturing plants (less than 10 employees), small construction operations (less than 10 employees), and low-volume retail establishments, provided employees have infrequent close contact with coworkers and the public.
- **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. Examples are most jobs at manufacturing plants, construction sites, schools, high-volume retail settings, and other high-population-density work environments.

Bentley Community Schools has no high-risk exposure jobs. High exposure risk jobs have high potential for exposure to known and suspected cases of COVID-19. Examples are most jobs in healthcare, medical transport, nursing homes and residential care facilities, mortuaries, law enforcement, and correctional facilities.

Bentley Community Schools has categorized its jobs as follows:

NOTE: Some jobs may have more than one type of exposure risk depending on the task or qualifying factors.

Job/Task	Exposure Risk Determination (Lower or Medium)	Qualifying Factors (Ex. No Public Contact, Public Contact)
Superintendent	Medium	Public Contact
District Office Administrators	Medium	Public Contact
District Office Staff	Medium	Public Contact
Building Administrators	Medium	Public Contact
Building Office Staff	Medium	Public Contact
Food Service Staff	Medium	Public Contact
Counselor	Medium	Public Contact
Teacher	Medium	Public Contact
Social Worker	Medium	Public Contact
Speech Therapist	Medium	Public Contact
Teacher Consultant	Medium	Public Contact
Paraprofessionals	Medium	Public Contact
Technology staff	Medium	Public Contact
Support Staff	Medium	Public Contact
Maintenance	Medium	Public Contact
Athletic Director	Medium	Public Contact

Coaches & Student Activity Leaders	Medium	Public Contact
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Workplace Prevention Measures

The District is asking every one of our employees to help with our preventative efforts while at work. In order to minimize the impact of COVID-19 at our worksite(s), everyone must play their part. The District has implemented the following best practices and steps to minimize exposure and prevent spread in the workplace.

Best Practices to Minimize spread of COVID-19:

- 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 wash 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
- Cough into your elbow whenever possible. If you do happen to cough or sneeze on your hands, wash your hands immediately.
- Maintain appropriate social distance of six feet to the greatest extent possible
- Avoid close contact* with people who are sick

The District will:

1. Provide all employees with non-medical grade masks (a cloth material that covers the nose and mouth) to wear while at work, if needed:
 - Employees are required to wear masks when they are indoors at all work locations, unless they are alone in an office/room with the door closed.
 - The CDC does not recommend the use of face shields as a substitute for masks. However, face shields may be used as an accommodation in certain circumstances, along with other mitigation.
 - Consider use of other Personal Protective Equipment (PPE) as appropriate (e.g. gloves, gowns).
 - Make reasonable accommodations for those who are unable to medically wear a mask.
2. Educate all 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:
 - Posting COVID-19 related policies and resources on the District's website.
 - Posting CDC and/or Michigan Department of Health and Human Services (MDHHS) information, including recommendations on risk factors at home and in the community.
 - Training all employees on the workplace infection-control practices in place, the proper use of personal protective equipment (PPE), the steps employees must take to notify BCS if they experience any symptoms of COVID-19 or have a suspected or confirmed diagnosis of COVID-19, and
 - How to report unsafe working conditions, including available reporting avenues.
 - Informing employees of the importance of good hand hygiene and providing 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 must use alcohol-based hand sanitizer that is at least 60% alcohol. If hands are visibly dirty, soap and water must be chosen over hand sanitizer.
 - Promoting and encouraging good hand hygiene by ensuring that adequate supplies of soap and hand sanitizer are maintained and placing hand sanitizers in multiple locations.
 - Discouraging handshaking and instead encouraging the use of other non-contact methods of greeting.
 - Prohibiting employees from using other employees' phones, desks, offices, other work tools and equipment, and other commonly touched surfaces when possible. If necessary, clean and disinfect them before and after use.
 - Reminding and encouraging employees to eat separately and never less than six feet apart.
 - Requiring and reminding employees that they must wear masks at all times whenever they are not alone in an office/room with the door closed.
 - Encouraging and requiring social distancing to the greatest extent possible while in the workplace
3. Develop protocol for social distancing practices:
- Keep everyone on the worksite premises at least six feet from one another to the maximum extent possible, including through the use of ground markings, signs, and physical barriers, as appropriate to the worksite.
 - Evaluate areas in which employees work within 6 feet of each other and determine options to increase distance apart.
 - Limit in-person meetings and if necessary, the number of people who can attend an in-person meeting to the number recommended by public health and medical officials.
 - Prohibit in-person work for employees to the extent that their work activities can feasibly be completed remotely. See Attachment G for in-person work guidelines. Staggered work shifts/start and end times will be implemented to the greatest extent feasible.
4. Restrict employees from the workplace if they display symptoms of COVID-19:
- All employees are required to complete a daily entry [MiSafeApp](#) that includes, 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, as long as recommended by the CDC, OSHA, or any other state or federal governmental body, including Executive Orders.
 - This self-screening may be completed before employees arrive at work or within one hour of employees arriving at work.
 - Employees must self-report to their supervisor as soon as possible after developing signs or symptoms of COVID-19.
 - Employees with symptoms will be immediately separated from others using measures such as but not limited to:
 - Requiring employees to leave the workplace.
 - Prohibiting employees from reporting to work
 - Allowing remote work if feasible

- Employees with a confirmed or suspected case of COVID-19 may only return to the workplace after they are no longer infectious according to the most recent CDC guidance and they are released from any quarantine or isolation order by the local public health department, if applicable.
5. The District will follow MDHHS/OSHA requirements and protocols if an employee, visitor, or student has a confirmed case of COVID-19, including reporting and recordkeeping requirements. In particular, the District will collect the contact information for any close contacts of the affected individual from two days before he or she showed symptoms to the time when he or she was last present at the school.
 - Close contact has been defined by the Genesee County Health Department as a person who was within 6 feet of a person infected with COVID-19 for more than 15 minutes with or without a mask.
 6. Perform increased routine environmental cleaning and disinfection:
 - The District will train the custodial staff and will comply with the OSHA standards for cleaning school buildings and other District facilities. The District will increase facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (e.g., door handles), paying special attention to parts, products, and shared equipment (e.g. tools, machinery, and vehicles).
 - The District will only use Environmental Protection Agency (EPA) N List approved disinfectants that are expected to be effective against COVID-19 based on data for harder to kill viruses. Employees will follow the manufacturer's instructions for use of all cleaning and disinfection products (e.g., concentration, application method and contact time, and personal protective equipment).
 - The District will maintain Safety Data Sheets of all disinfectants used on site.
 - Employees will be encouraged to sanitize their personal work areas upon arrival, throughout the workday, and immediately before departure, when practicable. Cleaning products will be available to employees to clean on a regular basis.
 - Employees will be instructed to routinely clean and disinfect all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, and doorknobs.
 - Employees will be provided with cleaning and disinfecting products so that commonly used surfaces (e.g. door knobs, keyboards, remote controls, desks, other work tools and equipment) can be wiped down by employees before each use.
 - The District has established procedures for disinfection in accordance with CDC guidance if it is suspected or confirmed that an employee, visitor, or student has a known case of COVID-19.
 7. The District does not have air conditioning and offers radiant heating. Thus, air purifiers have been provided for each classroom.
 8. Continue to evaluate options for employees at a higher risk for serious illness due to COVID-19.

9. Absenteeism will be monitored to ensure that the District is not experiencing an outbreak.
 - Implement plans to continue essential functions in case we experience higher than usual absenteeism.
 - Cross-train employees to perform functions so the workplace can operate even if key employees are absent provided such functions are within their scope of practice and consistent with applicable laws and regulations and collective bargaining agreements.

Complaint process for violations of this Plan

- **PROMPT NOTIFICATION OF COMPLAINT/CONCERN REQUIRED:**
 - Given the magnitude of responsibility and risk that employers and employees have in a return to work situation under the COVID-19 hazard, it is imperative that employees know they have not only a right but an affirmative duty to come forward and inform management about any matter of safety concern or activity involving themselves, a fellow coworker or operational problem related to the implementation of the COVID-19 Plan. Unlike other kinds of workplace hazards, a contagious virus is extremely time sensitive and deserves urgent attention. Any issue or unsafe action, behavior or operational process which an employee believes is causing or may cause potential threat of virus exposure is advised to immediately inform their principal/supervisor, any one of the designated COVID-19 Coordinators. This will enable the administration to promptly address the matter. No complaint is too big or too small to be given direct attention. The Complaint process is an important tool to help us quickly handle and resolve any issue.
- **CONFIDENTIALITY:**
 - The concern or complaint may be in regard to another coworker, a visitor, vendor or anyone coming into the District and therefore must be handled in a confidential manner. Upon submission a complaint and/or concern, only those who need to know in order to resolve the issue, will be provided the information. All matters will be investigated promptly. When appropriate, a response may result in updated educational announcements and/or policy reminders which will be sent to staff.
- **RETALIATION PROHIBITED:**
 - It is illegal to engage in any retaliatory conduct towards an employee who is raising a safety hazard complaint. No retaliation of any sort will be tolerated towards someone who files a COVID-19 related complaint. Anyone found to engage in any retaliatory conduct for such filing will face discipline up to and including discharge.

Employee Responsibilities to reduce the spread of COVID-19:

- All employees and contractors will:
 - Participate in COVID-19 Preparedness Plan Training
 - Read and comply with the BCS COVID-19 Preparedness & Response Plan
 - Complete the [Acknowledgment Form](#) for the BCS COVID-19 Preparedness & Response Plan
- Daily, conduct the [BCS Workplace Health Screener](#) prior to entering the workplace
- Employees will practice good hand hygiene as outlined in this plan
- Employees will avoid handshaking and instead use other non-contact methods of greeting

- Employees will avoid other employees' workspaces and commonly touched workplace tools (i.e. phones, computers, desks, copiers, printers, water coolers, refrigerators, etc.). If necessary, clean and disinfect them before and after use
- Employees will avoid sharing any items that would cross contaminate saliva (i.e. water bottles, food utensils)
- Employees will wear masks while in an enclosed location if 6 feet of social distance cannot be maintained

Engineering Controls

Bentley Community Schools has implemented feasible engineering controls to minimize or eliminate employee exposure to SARS-CoV-2. Engineering controls involve isolating employees from work-related hazards using ventilation and other engineered solutions.

For medium exposure risk jobs, engineering controls can include:

- Installing physical barriers (such as clear plastic sneeze guards) between coworkers or between workers and stakeholders.
- Increasing the amount of ventilation in the building.
- Increasing the amount of fresh outdoor air that is introduced into the building.

The following engineering controls have been implemented:

Job/Task	Engineering Control
Office Staff and others as necessary	Protective shields as a barrier
All employees	Increased outdoor air as part of air exchanges to system maximum (doubled outdoor air)
All employees	Removed unnecessary furniture to maximize space to maintain safe social distancing
All employees	Created safer social distancing at lunchtime by converting large spaces into additional lunchroom seating (media center, aux gym, etc.)
Employees working with unmasked K-12 students	Deployed HEPA MERV 17 air filtration systems which can filter the room air down to 0.3 microns approximately 6 times per hour.

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. The following administrative controls have been established for Bentley Community Schools:

Job/Task	Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Stakeholders)
Students	All students will maintain at least 3 feet from everyone when seated.
All employees	Maintain at least six feet from everyone on the worksite.
All employees	Use ground markings, signs, and physical barriers to prompt employees to remain six feet from others.
All employees	Restrict business-related travel for employees to essential travel only.
All employees	Restrict face-to-face meetings. Communicate with others through phone, email, teleconferencing, and web conferencing.

Athletics spectator limits, not allowing visitors or outside groups into our facilities	Restrict the number of people in the establishment at any given time.
All employees	Minimize the sharing of tools, equipment, and items.
All employees	Provide employees with non-medical grade face coverings and face shields
All employees	Require employees to wear cloth face coverings at all times, except when eating or drinking or when not medically viable.
All occupants	Require stakeholders and the public to wear cloth face coverings.
All employees	Provide employees with cleaning solutions, supplies, gloves, and protective shields
All employees	Keep stakeholders informed about symptoms of COVID-19 and ask sick individuals to stay at home until healthy again.
All employees	Provide stakeholders and the public with tissues and trash receptacles.
All employees	Promote curbside and home delivery to minimize contact with stakeholders.
All employees	Encourage proper handwashing, cough, and sneeze etiquette by employees, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands.
All employees	Ensure that sick leave policies are flexible and consistent with public health guidance, so employees do not go to work sick.
All employees	Do not require a healthcare provider's note for employees who are sick with acute respiratory illness to validate their illness.
All employees	Maintain flexible policies that permit employees to stay home to care for a sick family member.
All employees	Alter lunch schedules and locations to limit the number of students in the lunchroom spaces at one time.
All employees	Change pickup/dropoff times or locations to prevent congregating of students.
All employees	Enforce traffic flow guidelines in corridors and other public spaces

Hand Hygiene

Adequate hand washing facilities are available in the workplace and regular hand washing is required. Frequency of such handwashing will be determined in part by factors such as when and how often the employees' hands are potentially exposed to SARS-CoV-2. When handwashing facilities are not available, Bentley Community Schools shall provide employees with antiseptic hand sanitizers or towelettes.

Bentley Community Schools shall promote frequent and thorough hand washing, including by providing workers, stakeholders, and worksite visitors with a place to wash their hands. If soap and running water are not immediately available, provide antiseptic hand sanitizers or alcohol-based hand towelettes containing at least 60 percent alcohol.

Disinfection of Environmental Surfaces

Bentley Community Schools will increase facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (for example, door handles), paying special attention to parts, products, and shared equipment. Bentley Community Schools will make cleaning supplies available to employees.

Frequency of cleaning and disinfection will be determined in part by factors such as when and how often the environmental surfaces are potentially exposed to SARS-CoV-2. When choosing

cleaning chemicals, Bentley Community Schools will consult information on Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens. Products with EPA-approved emerging viral pathogens claims are expected to be effective against SARS-CoV-2 based on data for harder to kill viruses. The manufacturer's instructions for use of all cleaning and disinfection products will be strictly adhered to.

The following is a list of environmental surfaces, methods used to disinfect, and the frequency of such disinfection:

Surface	Method/Disinfectant Used	Schedule/Frequency
Desks/tables/counters	Spray and wipe with Envirox	At least every four hours (elementary level); after every class period grades 6-12.
Door handles	Spray and wipe with Envirox	At least every four hours
Fixtures	Spray and wipe with Envirox	At least every four hours
Switches	Spray and wipe with Envirox	At least every four hours
Restrooms	Spray and wipe with Envirox	Regular intervals during the day but no less than every four hours.
Athletic equipment	Spray and wipe with Envirox	After each use
Classroom materials	Spray and wipe with Envirox	After each use
Food service	Spray and wipe with Envirox	After each use
Bus seats, handles, etc.	Spray and wipe with Envirox	After each run
Technological devices	Disinfecting wipes	Devices are not shared amongst individuals. Devices are cleaned prior to being used by a different individual in cases where a device needs repair.

Bentley Community Schools will perform enhanced cleaning and disinfection after persons confirmed to have COVID-19 have been in a work area.

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

- Elementary school enhanced cleaning involves the utilization of the Electrostatic Victory Sprayer with Envirox 118.
- Secondary school enhanced cleaning involves the utilization of the Electrostatic Victory Sprayer with Envirox 118.

Personal Protective Equipment (PPE)

Bentley Community Schools will provide employees with the types of personal protective equipment, including KN95 respirators if necessary, for protection from SARS-CoV-2 appropriate to the exposure risk associated with the job. The employer must follow current CDC and OSHA guidance for personal protective equipment.

All types of PPE are to be:

- Selected based upon the hazard to the worker.
- 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.

Bentley Community Schools will provide non-medical grade face coverings (cloth face coverings) to employees (cloth face coverings are technically not considered PPE). Bentley Community Schools will require employees to wear face coverings at all times, except when eating or drinking or when not medically viable.

The following type(s) of PPE have been selected for use:

Job/Task	PPE
Cleaning/disinfecting staff	Surgical masks, vinyl or nitrile gloves, face shields, hand sanitizer
Teachers and other instructional staff	Surgical masks, rubber gloves, hand sanitizer
Non-instructional employees	Surgical masks, hand sanitizer
Employees deep cleaning	Surgical masks, disposable gloves, face shields, disposable gowns

Health Surveillance

Bentley Community Schools will conduct a daily entry self-screening protocol for all employees or contractors entering the workplace, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19.

As workers enter the place of employment at the start of each work shift, Bentley Community Schools will have employees [self-screen](#) for COVID-19. Bentley Community Schools will have employees complete a questionnaire covering the signs and symptoms of COVID-19 and their exposure to people with suspected or confirmed COVID-19. When necessary non-touch thermometers will be used for temperature screening. Bentley Community Schools will similarly screen contractors, suppliers, and any other individuals entering the worksite.

Employees have been directed to promptly report any signs and symptoms of COVID-19 to their supervisor. Bentley Community Schools has provided employees with instructions for how to make such a report to the employer.

The specific instructions for employee reporting signs and symptoms of COVID-19 are as follows:

- An employee is deemed "AT-RISK" by GCHD guidance if they or someone they live with answers yes to any of the following:
 - Temperature 100.4 or higher
 - Having ONE of the following primary symptoms
 - New Cough
 - Loss of taste or smell
 - OR having TWO of the following "concerning symptoms:

- Fever (measured or subjective)
- Chills
- Body aches
- Headache
- Sore throat
- Nausea or vomiting
- Diarrhea
- Fatigue
- Congestion or runny nose
- Tested POSITIVE for COVID-19 in the past 2 weeks
- Come in close contact with someone who tested POSITIVE for COVID-19 in the last 2 weeks
- Lives with an individual who has COVID-19 related primary or concerning symptoms
- If "At-Risk", the employee will not be allowed to enter the building until cleared

Bentley Community Schools will physically isolate any employees with known or suspected COVID-19 from the remainder of the workforce, using measures such as, but are not limited to:

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

Bentley Community Schools will not discharge, discipline, or otherwise retaliate against employees who stay at home or who leave work when they are at particular risk of infecting others with COVID-19.

When an employee is identified with a confirmed case of COVID-19, their supervisor will notify the local public health department immediately, and any co-workers, contractors, or suppliers who may have come into contact with the person who is the confirmed case of COVID-19, within 24 hours. When notifying coworkers, contractors, and suppliers, Bentley Community Schools will not reveal the name or identity of the confirmed case.

Bentley Community Schools will allow employees with a confirmed or suspected case of COVID-19 to return to the workplace only after they are no longer infectious according to the latest guidelines from the CDC.

Presence of a Positive Test for COVID- 19

- The employee must notify their direct supervisor.
- The District will notify the local health department.
- The employee who tested positive must stay home until:
 - They are fever free for at least 24 hours without the use of fever reducing medications **AND**
 - Other symptoms have improved **AND**
 - At least 10 days have passed since their symptoms first appeared or since they tested positive for COVID-19

- The District will determine which building the positive employee entered and conduct an immediate thorough cleaning and disinfecting of the premises using state, federal, and local guidelines. The District may temporarily close all or part of the workplace to allow for deep cleaning.

“Close Contact” with someone identified with a positive COVID-19 test

- If an employee comes into close contact with someone who is identified with a positive COVID-19 test or lives with someone who has tested positive for COVID-19, the employee must quarantine for 10 days.
- The employee must notify their direct supervisor.
- The District will notify the local health department.
- “Close contact” is not brief or incidental contact. Instead, the CDC defines “close contact” as either:
 - Being within approximately six feet of a COVID-19 infected person for a “prolonged period of time” (more than 15 minutes) or
 - Having direct contact with infectious secretions from a COVID-19 infected person or a person with any COVID-19 symptom(s) (e.g., being coughed on)

Guidelines for Symptoms that Develop While in the Workplace:

- If an employee shows symptoms of COVID-19 during the day, the employee should immediately put on a mask and isolate from others.
- The Employee must notify their direct supervisor immediately, leave the District, and consult their healthcare provider.

Communication Guidelines for Positive COVID-19 Cases at the Workplace:

- BCS will communicate with employees if there is a confirmed case of COVID-19 within our employee groups/buildings as necessary (including third party workers) via email. BCS will not share the employee’s name or personally identifiable information.
- BCS will notify and work with the Genesee County Health Department.
- BCS will clean and disinfect all areas of the building(s) that the employee might have come in contact with.

Training

Before entering into in-person employment all employees will:

- Participate in COVID-19 Preparedness Plan Training
- Read and comply with the BCS COVID-19 Preparedness & Response Plan
- Complete the [Acknowledgment Form](#) for the BCS COVID-19 Preparedness & Response Plan

Bentley Community Schools will train workers on, at a minimum:

- Workplace infection-control practices.
- 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.

Recordkeeping

Bentley Community Schools will maintain records of the following requirements:

- Training. The employer shall maintain a record of all COVID-19 employee training.
- Screening protocols. The employer shall maintain a record of screening for each employee or visitor entering the workplace.
- When an employee is identified with a confirmed case of COVID-19, record when the local public health department was notified; as well as any co-workers, contractors, or suppliers who may have come into contact with the person who was the confirmed case of COVID-19.

Confidentiality/Privacy

The confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under individual circumstances. When disclosure is required, the number of persons who will be informed of an affected individual's identity will be limited to those necessary to comply with reporting requirements, administration of benefits, and to limit the potential transmission to others. Notwithstanding the foregoing, BCS reserves the right to inform other employees and stakeholders that an unnamed BCS employee might have been exposed to COVID-19, so those individuals may take measures to protect their own health. Except as detailed above, staff who believe they may have been exposed to COVID-19 at work by a fellow employee may only share the details of the exposure with their personal healthcare provider or the appropriate County Health Department.

Temporary Remote Work - Written Policy

The following is Bentley Community Schools' written policy pursuant to MIOSHA Emergency Rule 5(8), "The employer shall create a written policy prohibiting in-person work for employees to the extent that their work activities can feasibly be completed remotely." Given that the MIOSHA Emergency Rule does not define the term "feasibly," the District interprets this requirement based on the common definition of the term, which is "capable of being used or dealt with successfully." Based upon this obligation and interpretation, and consistent with the guidance document issued by the MDHHS on November 6, 2020 (which provides that the guidance document does not supersede decisions of local school districts about virtual versus in-person schooling, and that a decision to move to virtual schooling should be made in conjunction with the local health department), the District establishes the following guidelines:

A. IN-PERSON INSTRUCTION: If the District is providing in-person instruction, and the employee is directly responsible for providing services to students or staff engaging in in-person instruction, then the employee may not work remotely, unless required pursuant to Paragraph C below. The following list identifies those positions where in-person work is required:

- **Professional Staff** - to perform duties associated with in-person learning

- **School Based Administrators/Directors** - to perform duties associated with in-person learning
- **Central Office Administrators/Directors** - to perform duties associated with oversight for in-person instruction
- **Secretaries** - to perform duties associated with in-person learning and perform duties legally required such as processing mail, student accounting, and student file management.
- **Food service employees** - to perform duties related to the meal distribution program associated with in-person learning
- **Maintenance/Grounds** - to perform duties associated with maintaining district property including the repair and maintenance of district equipment necessary for in-person work
- **Cleaning/Custodial** - to clean buildings to ensure compliance with MIOSHA standards for the Coronavirus
- **Technology Staff** - to perform duties in support of in-person learning and to collect, repair, and distribute district technology to parents, students, and staff
- **Finance/Human Resources** - to process the payment of district financial obligations and meet other legal requirements including payroll
- **Administration Building Support Staff** - to perform duties associated with in-person learning, duties which serve public obligations and other requirements which have on-site expectations
- **Paraprofessionals** - to perform duties associated with in-person learning with on-site expectations

B. REMOTE INSTRUCTION: If the District, or any segment of the district, is providing full remote instruction, the Superintendent or designee may determine which employee(s) can feasibly work remotely to effectively and efficiently perform their job duties and responsibilities, as permitted by law. An employee who is permitted to work remotely by the District may be recalled to in-person work if the District subsequently determines that the employee's work cannot feasibly be performed remotely.

- **Professional Staff (Teachers and Ancillary staff) Requirements:** In order for remote work to be feasibly performed, it must be performed successfully. When providing virtual instruction, teachers/ancillary staff may work remotely if it is necessary and the professional staff member can satisfy all of the following conditions:
 - The employee has reliable high-speed internet capable of video streaming. The expectation from the District is that the employee has their camera on at all times during virtual instruction.
 - The employee can fulfill the instructional requirements for K-12 virtual learning schedule(s).
 - The employee can fulfill the instructional responsibilities for students who are still permitted to attend in-person learning during periods of full virtual instruction.
 - The employee can implement the full board approved curriculum without reductions or modifications to learning objectives, common assessments, or educational goals.
 - The employee can ensure accommodations and supports identified in student IEPs and 504 plans are fulfilled with fidelity.

- The employee protects and maintains student privacy, including but not limited to adequately secure and prevent disclosure of student education records.
- The employee has a private area for remote work and virtual instruction that is not accessible by others and free from distractions and disruptions.
- The employee provides necessary teaching resources that may be accessible in a classroom setting. Examples include manipulatives, lab equipment, musical instruments, whiteboard or chart paper, or mentor texts.
- The employee may not remove from their classroom computer equipment such as desktop computers, cameras, microphones, document cameras, etc. without permission from the building administrator.
- The employee can resolve technology hardware issues that may disrupt the successful delivery of instruction that otherwise would be resolved by district technology staff onsite.
- The employee must post Google Meet or Zoom links in their Canvas courses or Google Classroom playlists that allow building administrators to conduct both formal and informal observations of virtual instruction.
- The employee is available and responsive with communication, including but not limited to, email and telephone.
- Social Media may only be utilized for school related purposes during normal school hours.

If all of the above conditions are met, the staff member may provide virtual instruction remotely. If at any time, remote work is not deemed of the quality necessary to be successful as determined by the school principal through feedback and formal or informal observations, the employee will be required to work on-site. The principal or supervisor may waive a condition based on the extenuating circumstances of an employee and will be addressed on a case-by-case basis. Any performance-related issue should be documented and shared with the staff member through feedback and observation feedback.

- **Building and District Support Staff (All non-teaching staff members) Requirements**
The Superintendent will instruct supervisors to determine which employee classifications can feasibly work remotely to effectively and efficiently perform their job duties and responsibilities, as permitted by law. If an employee classification cannot perform the duties of the job remotely they will be required to perform in-person work. Additionally, support staff may be redeployed to support other critical district functions.
- **All other employees, including: District Office and Building Administrators, Technology**
 - The employee has reliable high-speed internet capable of video streaming. The expectation from the District is that the employee has their camera on at all times during video conferencing meetings (when scheduled) and is available by telephone throughout the workday.
 - The employee can fulfill the requirements and responsibilities of their job.
 - The employee protects and maintains privacy and security of sensitive district records, including but not limited to employee records, student records, financial records, and all other business matters normally considered confidential.

- The employee has a private area for remote work not accessible by others and free from distractions and disruptions.
- The employee provides necessary resources in order to conduct work remotely.
- The employee may not remove from their workspace: desktop computers, cameras, microphones, etc.
- The employee can resolve technology hardware issues that may disrupt the successful ability to perform their job functions.
- ~~The use of Social Media is prohibited during normal school hours.~~
- Social Media may only be utilized for school related purposes during normal school hours.

- **Custodial and Maintenance Requirements:** Due to the nature of these jobs, remote work is infeasible. Custodian and Maintenance employees must be onsite in order to repair, clean, and maintain facilities and operations.

C. Notwithstanding anything to the contrary in this Policy, a person with a disability may request remote work as a reasonable accommodation for a disability that has been confirmed by a medical practitioner. In such cases, the employer and employee will engage in the interactive process consistent with the Americans with Disabilities Act (ADA) of 1990.

Granting of remote work as a reasonable accommodation during the COVID-19 pandemic shall be temporary, and does not obligate the District to grant remote work as a continuing reasonable accommodation after the expiration of Emergency Rule 5(8). The determination of whether remote work is a permanent reasonable accommodation for an employee with a disability will be made on a case-by-case basis. Virtual teachers previously approved to work remotely due to high risk factors associated with COVID-19 may continue to work remotely.

D. This Policy shall not limit the District's ability to determine the method of instruction to students or to provide instruction in the best interest of its students. The Board has the authority to determine whether students will receive instruction in-person, remotely, or through an alternative method.

E. Employees who are required to work in-person may appeal that decision in writing to Kristy Spann, Superintendent, kspann@bentleyschools.org.

F. Employees who work remotely are expected to follow all applicable work rules (e.g., work hours, start times, attendance rules, leave requests, etc.)

G This Policy will expire April 14, 2021, unless Emergency Rule 5(8) is otherwise extended, or unless expressly extended by the Board.