



OSHA (ETS) COVID-19 Preparedness and Response Plan

The City of Birmingham has prepared this COVID-19 Preparedness and Response Plan in compliance with Occupational Safety & Health Administration (OSHA) requirements and the Center for Disease Control (CDC). The City will continue to proactively monitor and respond to the public health emergency in a calm and rational manner, and in compliance with Federal, State, and County orders and other guidance.

City employees will also continue to work diligently and tirelessly to maximize public health and safety while minimizing the social and economic impacts of the emergency. Ensuring that critical infrastructure is maintained and operational, the City's finances remain in excellent order, and planning and preparation for future projects and initiatives to continue forward is also a high priority as the City strives to emerge from the pandemic.

This Plan is a living document and is subject to change as the COVID-19 emergency continues to evolve. New Federal, State, and County orders and guidance, including but not limited to CDC recommendations and other pertinent orders, will be considered as part of this plan as they are issued.

I. General Information / Proper Hygiene

A. The most common symptoms for COVID-19 infected persons include:

1. Fever or Chills
2. Cough
3. Shortness of Breath or Difficulty Breathing
4. Fatigue
5. Muscle or body aches
6. Headache
7. New loss of taste or smell
8. Sore throat
9. Congestion or running nose
10. Nausea or vomiting
11. Diarrhea

B. Precautions that individuals can take to help stop the spread of the virus have been promulgated by the Centers for Disease Control and Prevention (CDC) and the Occupational Safety and Health Administration (OSHA) and include:

1. Staying home when sick.

2. Frequently washing your hands with soap and warm water for at least 20 seconds. Help young children. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol.
3. Avoiding touching your eyes, nose, or mouth with unwashed hands.
4. Covering your nose and mouth with a tissue when you cough or sneeze, or cough/sneeze in your upper sleeve. Immediately throw away used tissues in the trash, and then wash hands.
5. Avoid sharing a ride with people outside your household.
6. Avoiding close contact, sharing cups, or sharing eating utensils.
 - a. Cleaning and disinfecting frequently touched surfaces, such as toys, counters, handrails, and doorknobs.
 - b. Avoiding close contact with people who are sick.
 - c. Practicing good health habits. Get plenty of sleep, be physically active, manage your stress, drink plenty of fluids, and eat nutritious food.
 - d. Being prepared with the following supplies:
 - i. Maintaining a two-week supply of water and food at home;
 - ii. Routinely checking your regular prescription drugs to ensure that you won't run out;
 - ii. Keeping non-prescription drugs and other health supplies on hand;
 - iii. Getting copies and maintaining electronic versions of health records;
 - iv. Talking with family members about how they would be cared for if they got sick and what would be needed to care for them in your home.

C. Positive Diagnosis or Symptoms of COVID-19

If you test positive for COVID-19, or think you might have COVID-19, follow the recommendations of the CDC as follows:

1. Stay home except to get medical care:
 - a. Stay home. Most people with COVID-19 have mild illness and are able to recover at home without medical care. Do not leave your home, except to get medical care. Do not visit public areas.
 - b. Stay in touch with your doctor. Call before you get medical care. Be sure to get care if you have trouble breathing, or have any other emergency warning signs, or if you think it is an emergency.
 - c. Avoid public transportation: Avoid using public transportation, ride-sharing, or taxis.
2. Separate yourself from other people in your home, which is known as home isolation:

Stay away from others: As much as possible, stay away from others. You should stay in a specific "sick room" if possible, and away from other people in your home. Use a separate bathroom, if available.

II. City Hall and Public Buildings (All Occupants)

- A. While City offices continue to serve the public, access to all municipal buildings is limited to staff only, except for the lobby of City Hall, until further notice. Social distancing guidelines remain in place for staff to minimize public contact and provide the safest environment possible for our employees. The public is encouraged to contact any department requiring assistance via phone or email. Visit www.bhamgov.org/contacts to view a list of departmental contact numbers for services needed.
- B. Mail and other deliveries are accepted at designated outside entrances only. Essential City contractors may be allowed in City buildings for needed building repairs, by appointment only, and are required to follow established entry and social distancing protocols in effect for City staff.
- C. In-person meetings between the employees of City Hall and the public will be allowed at a table in the west hallway of the first floor of City Hall.
- D. High touch point areas, including but not limited to door knobs, handrails, countertops, lunchrooms, restroom stalls and sinks, shall be cleaned and disinfected daily by Signature Cleaning Company.
- E. Hand sanitizers are placed in multiple conspicuous locations in each occupied City building, and shall be kept filled.
- F. Guidance posters promoting proper hand hygiene, cough and sneeze etiquette, and staying home when sick, have been placed in multiple conspicuous locations in each occupied City building.
- G. Maintenance personnel shall ensure that all lavatories have adequate soap and towels to accommodate increased use.
- H. Building offices and common areas are fogged with disinfectant on Tuesday and Thursday evenings by the City of Birmingham Facilities Maintenance Superintendent or designee utilizing an electrostatic sprayer with a CDC-approved cleaning solution that kills COVID-19.
- I. Engineering Controls
 - 1. Plexiglass partitions have been installed at all public counters to protect staff and customers while allowing transactions with full visibility.
 - 2. Plexiglass partitions have been installed in offices where desks are in close proximity.
 - 3. Interior doors should be left open during working hours to promote airflow.
 - 4. High-efficiency filters have been installed in each City building HVAC system. Air handling unit fans are set to run continuously and with fresh air inlets open.
 - 5. City Hall elevator occupancy will be limited to one person at a time, with appropriate signage.
 - 6. Visual indicators of six-foot spacing have been placed outside designated building entrances.
 - 7. City employees may now use any entrance or exit of City Hall.

8. Portable air cleaners have been placed in high-density areas to provide additional filtration.

III. Public Meetings and City Programs

- A. Effective July 1st, 2021, the City will hold hybrid virtual/in person board and Commission meetings. Staff have been encouraged to also conduct all non-public meetings through virtual means to minimize face-to-face contact.
 - a. Signs are posted at the doors of the Commission and conference rooms to have all attendees wear a CDC approved face mask.
 - b. Signs will be posted at the doors of the Commission and conference rooms to remind attendees not to enter if they are exhibiting any COVID-19 symptoms.
 - c. HVAC controls will be set to circulate air continuously and portable air purifiers will be placed in the Commission and conference rooms to help clean and circulate room air.
 - d. Signs will be placed on seats in the Commission room to ask participants to maintain social distance.
 - e. The City Commission room will be cleaned before and after any meeting with an electrostatic sprayer using an EPA approved solution.

IV. **Mandatory COVID 19 Vaccination Requirement - All Full-Time and Part-Time City Employees; (Seasonal City employees that exclusively work outdoors are exempt from vaccination and weekly testing).**

The COVID-19 pandemic is continuing to affect the health and safety of our residents and personnel. The FDA-approved Pfizer COVID-19 vaccine is a safe and effective preventative measure to protect against serious, long-lasting health effects and death. It is mission critical to take all available precautions to prevent the spread of this contagious virus to co-workers, citizens, family members, and friends.

Per OSHA and CDC COVID-19 guidance, all personnel should be fully vaccinated against COVID-19. The City is mandating vaccination against COVID-19 for all employees. Personnel must have a vaccine card on file with the City by December 1, 2021. The vaccine mandate began on September 2, 2021 for the fire department, September 20, 2021 for the police department and November 1, 2021 for all other City employees.

Employees that wish to get vaccinated on City time will be allowed up to 4-hours paid time off to receive the COVID-19 vaccination and boosters. **Additionally, up to two days paid time off will be allowed, from the appropriate leave time bank, for any adverse reactions from the vaccine.**

Exceptions to becoming and considered fully vaccinated are as follows:

- A. Non-vaccinated personnel must consent to regular weekly COVID-19 testing.

1. Testing procedures:
 - a. Department designated supervisors will supervise and conduct the tests weekly to their respective personnel. Current FDA Emergency Use Authorization (EUA) antigen over the counter (OTC) test kits require the nasal passage to be swabbed once on day one at the beginning of a shift and a second nasal swab test administered 24 to 36 hours later (2 swabs weekly). The non-vaccinated employee will swab their own nasal passages in accordance with the test directions and under supervision.
 - b. The employee and test supervisor shall fill out the COVID-19 testing consent form and turn it into Human Resources for recordkeeping.
 - c. All rapid test results that are positive for COVID-19 shall be followed up by having the employee obtain a nucleic acid amplification test (NAAT) at Beaumont Urgent Care. These employees shall remain on-duty while a NAAT test is performed (for a maximum of 3 hours). During this time, employees awaiting results may perform work while fully masked and isolated away from other employees. If the NAAT results take longer than 3 hours, employees will then be placed on the appropriate leave until they are cleared by receiving the results of a negative NAAT test. If the employee has a positive NAAT test, they will remain off duty for at least 10 full days per the CDC.
 - d. Non-vaccinated personnel shall be responsible for ensuring their weekly test is performed on time. Tests will be witnessed and documented by the designated supervisor.
 - e. Test kit information is available upon request.
 - f. Testing commencement, testing frequency, and termination of testing will be determined by the City.
2. Employees who object to City provided nasal swab testing for medical reasons shall provide a weekly negative alternative FDA EUA test at the employee's expense and time since this is an alternative to a mandatory vaccine requirement.
3. Employees that are unvaccinated but have been diagnosed with COVID-19 in the last 90 days do not get tested weekly.
4. Training for administering the OTC COVID-19 test for unvaccinated employees will be provided by a Birmingham Fire Department paramedic. After the initial swab collection (by the unvaccinated employee) a few timed steps are needed to ensure the accuracy of the test which will be performed by the supervisor.
5. For confidentiality, test results and vaccination status will only be shared with pertinent supervisors and HR.
6. Test results will be provided to the employee upon request and all records will be kept per HIPAA.

V. Employees / Workplace (Exposure Determination and Preventative Measures)

A. Essential Workers

City employees have been deemed essential in support of the specified exemptions of critical infrastructure as well as our first responders. As such, employees are expected to report to work at their regular starting times. However, the City is maximizing the use of appropriate and feasible remote work in continuing to re-evaluate our service level needs and essential functions, and our employees' role in meeting these needs as they evolve during this crisis.

The City of Birmingham has evaluated routine and reasonably anticipated tasks and procedures for all employees to determine whether there is actual or reasonably anticipated employee exposure to COVID-19. Department Heads, along with the Fire Chief/Emergency Manager, are responsible for the exposure determination.

The City has determined that its employees' jobs (excluding the Fire Department and Police Department) fall into only the medium exposure risk categories as defined by the MIOSHA Guidance on Preparing Workplaces for Covid-19.

Job/Task	Exposure Risk Determination (Lower or Medium)	Qualifying Factors (Ex. No Public Contact, Public Contact)
Office/Clerical (City Hall)	Medium	Public Contact
Inspection/Code Enforcement (City Hall)	Medium	Public Contact
Office/Clerical (Library)	Medium	Public Contact
Office/Clerical (Museum)	Medium	Public Contact
Office/Clerical (Ice Arena)	Medium	Public Contact
Water/Sewer/Roads/Parks (DPS)	Medium	Per DPS Policies / Protocols
Firefighting/EMS (Fire)	High	Per Fire Policies / Protocols
Office/Clerical – City Hall (Police)	High	Public Contact
Patrol (Police)	High	Per Police Policies / Protocols

B. Employee and Workplace Safety (Health Surveillance)

1. Prior to leaving home for work, all employees must self-answer the COVID-19 screening questions along with taking their temperature. Employees who do not have a thermometer should contact their department head and a thermometer will be issued to them. If an employee has a temperature at or greater than 100.4°F or is positive for any COVID-19 symptoms, they shall not come to work and they must contact their direct supervisor immediately.
2. Pursuant to CDC guidance, employees who are feeling ill have been encouraged to stay at home and take the appropriate measures to become well. At the workplace, employees have been strongly encouraged to social distance by at

- least six feet and follow all personal hygiene recommendations including those listed in Section I (B) above, in order to help keep each other healthy.
3. Employees shall be provided with cleaning and disinfectant supplies and shall be required to wipe down their workstations at least twice daily.
 4. Face masks must follow CDC recommendations and shall exclude the following:
 - a. Cloth/fabric masks with less than two layers;
 - b. Masks that do not cover the nose and mouth;
 - c. Neck "gaiters";
 - d. Masks with exhalation valves; and
 - e. Neckerchiefs.
 5. **Face masks shall be worn by all City employees** in stairwells, hallways, restrooms, common areas such as conference rooms, printer locations, locker rooms, on City property while entering and exiting buildings, and while inside any non-city owned buildings. Face masks are also required in any shared spaces where 6 feet or more of physical distancing cannot be maintained. This section does not apply to individuals who are unable to medically tolerate face masks.
 6. **Face masks must be worn at all times by non-vaccinated workers, except while alone in a vehicle, while eating, or while alone in a single fully enclosed office.**
 - a. **Suspected violators of the City's mask policy will be reported to their Department Head and City Manager, with corrective action to follow from HR.**
 7. Face shields and N95 respirators will be required and shall be provided when employees cannot consistently maintain three feet of separation from other individuals in the workplace.
 8. Non-medical grade face masks will be provided to non-first responder employees.
 9. When the City becomes aware that an employee has been identified with a confirmed case of COVID-19, the City will, within one business day, notify the Oakland County Health Division and any City employees, contractors and suppliers who may have come into contact with the individual. No protected health information will be released.
 10. In the event of a known, positive COVID-19 case in the workplace involving either an employee or visitor, the immediately affected area will be deep cleaned and disinfected by the City of Birmingham Facilities Maintenance Superintendent or designee. The area will remain temporarily closed and evacuated until cleaning and disinfection are completed. Cleaning may include a combination of fogging, surface wiping, and electrostatic spraying with a CDC-approved cleaning solution that kills COVID-19. Employees working in those areas will be temporarily reassigned unless self-quarantining is necessary due to close contact with the infected individual.
 11. The City will notify employees upon learning that an individual such as a customer, supplier or visitor with a confirmed case of COVID-19 has visited the workplace. No protected health information will be released.
 12. Social gatherings and meetings that do not allow for physical distancing of six feet or more are prohibited.
 13. Employee sharing of phones, computers, equipment, and food is prohibited.
 14. Department Heads are responsible for ensuring compliance with this plan. Each Department Head shall appoint one or more workplace COVID-19 coordinator(s)

to implement, monitor, and report to them on the COVID-19 control strategies contained in this plan. The supervisor shall remain on-site at all times when employees are present, and an on-site employee may be designated to perform in this role. Department Heads shall provide the names of their respective worksite supervisors to HR.

15. In accordance with the City's Employee Handbook, employees are obligated to report to their supervisor any condition that might be hazardous to the safety of City employees or the public. This may be in writing or verbally.
16. Any employee who believes that a safety issue exists that has not been addressed by the City in a timely matter can contact MIOSHA at (800) 866-4674 or online at <https://safetyhealthhazards.apps.lara.state.mi.us>.
17. Employees who are experiencing suspected COVID-19 symptoms or who have received a suspected or confirmed diagnosis of COVID-19 shall so notify their Department Head. In-person notification is not required, and is in fact discouraged for safety reasons. Upon notification by an employee, the Department Head shall notify HR and the Emergency Manager.
18. Employees who are symptomatic are not required to physically visit their doctor's office for medical documentation, but rather shall contact their doctor to have such documentation sent to HR. Employees requesting the use of time under the Families First Coronavirus Response Act (FFCRA) shall complete and submit the City's Leave Request Form, per City policy (see below).
19. Employees who are self-quarantining in order to care for a sick individual at home will be required to adhere to CDC guidelines while in quarantine and to wear a face mask for one week upon return to work provided they are medically able to tolerate a face mask
20. Training: Below are education publications that each employee is to be aware of and review.

<https://www.nationaljewish.org/patients-visitors/patient-info/important-updates/coronavirus-information-and-resources/health-tips/self-care-tips/how-to-put-on-a-surgical-mask>

<https://www.youtube.com/watch?v=9pVy8sRC440>

https://www.cdc.gov/coronavirus/2019-ncov/vaccines/effectiveness.html?s_cid=10493:us%20vaccine:sem.ga:p:RG:GM:gen:PTN:FY21

[Penalties for Knowingly Supplying False Information](#)

<https://www.osha.gov/sites/default/files/publications/OSHA4157.pdf>

<https://www.osha.gov/coronavirus/ets2>

- a. Training shall also include weekly department head staff meeting discussions of COVID-19 updates as provided by City staff.

21. Employees are discouraged from occupying a City vehicle together. When two or more employees must occupy a City vehicle, the occupants must wear a CDC approved face mask and have the windows partially down for better circulation.

22. Recordkeeping:

- a. The Human Resources Department and Assistant to the City Manager will maintain records of the following requirements:
 - i. Training
 - ii. Screening Protocols
 - iii. Vaccination status
 - iv. COVID-19 test results
 - v. Quarantine employee memos
 - vi. Isolation employee memos
 - vii. Confirmed Covid-19 cases; to include the following:
 - a. Date on which the Oakland County Health Department was notified of positive case; and
 - b. List of co-workers, contractors, and suppliers who may have had close contact with the positive COVID-19 case.

C. Remote Work/Staggered Shifts/Alternative Workspaces

In accordance with CDC recommendations and MDHHS/OSHA orders, temporary remote work has been offered to exempt and non-exempt employees on a full or partial week basis in order to reduce building occupancy while continuing to maintain operations and perform essential functions. Employees approved for remote work are required to read and sign the City's COVID-19 Remote Work Policy and Notice inclusive of the approved remote work schedule, and to submit a weekly log and attestation of the job tasks performed remotely. The completed and approved weekly log and attestation must be received by HR no later than Noon on the Monday following the remote work week in order to process payroll hours and compensation for that week. Employees will not be paid for remote work that is not properly documented and reported on time. Additionally, each department shall stagger daily shifts and breaks to ease congestion in break rooms, locker rooms, and employee entrances, as well as utilize alternative unused City building workspaces, where available.

D. Employee Leave

As explained in the COVID-19 Leave Policy for Staff, the City has provided an additional COVID-19 Leave Bank of 64 hours and 32 hours, respectively, for full and part-time employees. This bank of time, which is in addition to other paid leave time, is available for COVID-19 related purposes utilizing the eligibility criteria contained in the Federal Emergency Paid Sick Leave Act (EPSLA). COVID Leave remains available for use until December 31, 2021.

On January 1, 2022, all remaining COVID-19 and EPSL bank time for non-vaccinated personnel will be zeroed out if a current COVID-19 vaccine card is not on file with the City. **Additionally, all City employees must have had the CDC and FDA recommended booster shot within one month of eligibility or of the date of this memo (whichever date is later), to keep the current COVID-19 and EPSL bank.**

Fully vaccinated (including recommended boosters) personnel's COVID-19 and EPSL banks will be extended through **December 31, 2022**. Employees with verified medical exemptions for not becoming fully vaccinated that are provided by their personal medical doctor and verified by the City, will also have their COVID-19 leave banks added to and extended in the same manner. In addition, the COVID-19 Leave Policy also details the City's implementation of the FFCRA, inclusive of the EPSLA and Emergency Family and Medical Leave Expansion Act (EFMLEA), which is available to all employees who have been employed for at least thirty (30) calendar days.

E. Temporary Medical Plan Amendments Related to COVID-19

As part of the City's continued efforts to meet the health and wellness needs of employees and covered dependents, the City has enhanced medical plan coverage for care related to the diagnosis and testing of COVID-19.

Effective March 15, 2020, through June 30, 2022, the City has waived deductibles and copays for provider office visits, and urgent care visits related to **symptomatic** COVID-19 testing for all members enrolled in the City of Birmingham medical plan.

The following medical plan coverage will apply during this period:

1. Virtual care is highly encouraged as a way to help avoid germs and lessen the burden on emergency departments. Effective April 1, 2020, the City has added the Teladoc virtual care service at 100% with no cost to members for any of the services provided. Please use Teladoc virtual care for online visits at www.teladoc.com. You may also download the Teladoc app to your mobile device. For questions, please call 1-800-Teladoc.
2. Office visit copays as well as urgent care and emergency room visit copays related to COVID-19 will be covered at 100%.
3. Laboratory charges directly related to COVID-19 **testing for symptomatic employees** will be covered with no member deductibles or copays, regardless of whether the testing occurs at a physician's office, clinic, urgent care or emergency department.
4. There are no prior authorization requirements for members to receive COVID-19 testing or treatment. This authorization waiver includes any inpatient hospitalization related to COVID-19.
5. Emergency department visits will continue to be covered under the current schedule of benefits. Members will be encouraged to contact their primary care

provider for care direction and guidance to help minimize the burden on Emergency Room staff and facilities.

6. Charges associated with treatment, hospitalization, or other care will continue to be covered according to the member's current medical plan.

F. Exposure to COVID-19

Please refer to Section I (C) above if you have COVID-19 symptoms.

1. **Non-vaccinated** City employees that are exposed to COVID-19 must report the exposure to their department head immediately to determine quarantine time. Exposed non-vaccinated employees will be quarantined per the CDC for 14 days. Employee quarantine memos directing the employees quarantine time must be signed and returned to the Assistant to the City Manager and Fire Chief within 24 hours of issuance.
2. Vaccinated City employees that are exposed to COVID-19 do not need to be quarantined or report an exposure. Per CDC, you should get tested 3-5 days after the exposure, wear a face mask for 14 days, and continue monitoring symptoms after the exposure.
3. **Any employee that experiences COVID-19 symptoms, regardless of vaccination status, must get a NAAT test (such as a PCR test) for COVID-19 prior to returning to work. Weekly rapid screening tests are not for symptomatic employees at this time. NAAT test results are to be sent to the Assistant to the City Manager, HR, and the Fire Chief. COVID-19 positive employees must be isolated and cannot return to work for 10 days from a positive NAAT test or 10 days from symptoms that lead to a positive NAAT test. Employees must also have improved symptoms and be fever free for 24 hours without fever reducing medication prior to returning to work.**

VI. Emergency Command and Operations

A. Emergency Operations Center (EOC)

Under the City's Emergency Response Plan (ERP), the City has activated the EOC which is staffed by the City Manager and representatives of all City Departments. The purpose of the EOC is to plan, implement, and coordinate the City's response to the COVID-19 emergency. Virtual EOC meetings are held as needed. The Fire Chief serves as the City's Emergency Manager under Michigan Public Act 390 of 1976, and the City's ERP.