COVID-19 Preparedness and Response Plan

Date Implemented: May 1, 2020
In order to respond to the current state of emergency related to the novel coronavirus ("COVID-19") and to comply with relevant state and local orders related to COVID-19, Cornerstone University (University) has prepared the following COVID-19 Preparedness and Response Plan ("Plan"). This Plan may be updated as this situation evolves or as state or local orders related to COVID-19 are issued or amended.

Essential Workers Necessary to Perform Critical Infrastructure Functions or Conduct Minimum Basic Operations

Executive Order 2020-42 prohibits businesses or operations to operate a business or conduct operations that require workers to leave their homes except to the extent those workers are necessary to sustain or protect life (i.e., critical infrastructure workers) or to conduct minimum basic operations. Appendix A contains a list of critical infrastructure workers as described by the U.S. Cybersecurity and Infrastructure Security Agency in its March 19, 2020 guidance as well as additional categories of such workers identified by Governor Whitmer in Executive Order 2020-42.

Under Executive Order 2020-42, workers who are necessary to conduct minimum basic operations are “those workers whose in-person presence is strictly necessary to allow the business or operation to maintain the value of inventory and equipment, care for animals, ensure security, process transactions (including payroll and employee benefits), or facilitate the ability of other workers to work remotely.”

Only “critical infrastructure workers” or those required to conduct minimum basic operations may be permitted to perform in-person activities so long as any in-person work is performed consistently with the social distancing and mitigation measures required under any relevant executive order or public health order. Workers designated as critical infrastructure workers or those required to conduct minimum basic operations will be informed of such designations in writing, if so required.

Protective Safety Measures

Sick Leave Employees are permitted to take paid sick leave. Any onsite employee who appears to have a respiratory illness may be separated from other employees and sent home.

Remote Work All employees who are not essential to operations, and whose job duties reasonably allow them to telework, will work remotely.
**Employee Screening Before Entering the Workplace** A sample Employee Entry Screening Questionnaire is attached as Appendix B. The online COVID-19 Google Form should be completed by all employees before being permitted to enter the workplace and should comply with any required screening process required by the state or local jurisdiction in which the business is located. If an employee fails the screening process, he or she should be sent home until allowed to return to work under the relevant executive orders or public health orders, which requirements are explained in detail in the Return to Work Plan, attached as Appendix C.

**Enhanced Social Distancing** Supervisors will direct employees to perform their work in such a way so as to reasonably avoid coming within six feet of other individuals. The number of employees permitted in any break room or lunch room shall be limited to ensure social distancing restrictions can be followed. Employees should remain in their assigned work areas as much as possible. Employees whose job duties regularly require them to be within six feet of members of the public will be provided with appropriate personal protective equipment or physical barriers commensurate with their level of risk of exposure to COVID-19.

**Enhanced Hygiene** Employees are instructed to wash their hands frequently, to cover their coughs and sneezes with tissue, and to avoid touching their faces. Employees will be provided with access to places to frequently wash hands or to access hand sanitizer. Signs regarding proper hand washing methods will be posted in all restrooms. Hand shaking is also strongly discouraged to ensure good hand hygiene.

**Enhanced Cleaning and Disinfecting** Increased cleaning and disinfecting of surfaces, equipment, and other elements of the work environment will be performed regularly (at least every 24 hours for all public spaces) using products containing EPA-approved disinfectants. Employees will be provided with access to disposable disinfectant wipes so that any commonly used surfaces can be wiped down before each use. In the event that an employee that has been in the workplace in the past 14 days tests positive for COVID-19, the University will perform a deep disinfecting clean or outsource the cleaning to a third-party company before any other employees use the space.

**Visitors** No visitors should be allowed in the workplace unless they are deemed essential to address an issue related to critical infrastructure functions. If a visitor presents with symptoms of COVID-19 or answers yes to any of the screening questions do not allow them into the building.
Employees with Suspected or Confirmed COVID-19 Cases

**Suspected Cases**

An employee will be considered to have a Suspected Case of COVID-19 if:

- They are experiencing any of the following COVID-19 symptoms:
  - Fever;
  - Shortness of breath; and/or
  - Continuous cough.
- They have been exposed to a COVID-19 positive person, meaning:
  - An immediate family member has tested positive for or exhibited symptoms of COVID-19; or
  - In the last 14 days, the employee came in close contact with someone who has tested positive for COVID-19.

If an employee believes that he or she qualifies as a Suspected Case (as described above), he or she must:

- Immediately notify supervisor and/or Human Resources contact;
- Self-quarantine for 14 days; and
- Seek immediate medical care or advice.

If an employee qualifies as a Suspected Case, then the University will:

- Notify all employees who may have come into close contact (being within approximately six feet for a prolonged period of time without PPE) with the employee in the past 14 days (while not disclosing the identity of the employee to ensure the individual’s privacy); and
- Ensure that the employee’s work area is thoroughly cleaned.

**Confirmed Cases**

An employee will be considered a Confirmed Case of COVID-19 if the employee has been performing in- person operations in the past 14 days and that person tested positive for COVID-19.

If an employee believes that he or she qualifies as a Confirmed Case (as described
above), he or she must:

- Immediately notify supervisor and/or Human Resources contact of his or her diagnosis; and
- Remain out of the workplace until they are cleared to return to work.

If an employee qualifies as a Confirmed Case, then the University will:

- Notify all employees who may have come into close contact with the employee (being within approximately six feet for a prolonged period of time without PPE) in the past 14 days (while not disclosing the identity of the employee to ensure the individual’s privacy);
- Ensure that the entire workplace, or affected parts thereof (depending on employee’s presence in the workplace), is thoroughly cleaned and disinfected;
- If necessary, close the work area or workplace, until all necessary cleaning and disinfecting is completed; and
- Communicate with employees about the presence of a confirmed case, the cleaning/disinfecting plans, and when the workplace will reopen.

**Business Continuity Plans**

The COVID-19 Workplace Coordinator will: (1) work with management to cross-train employees to perform essential functions so the workplace can operate even if key employees are absent; (2) identify alternate supply chains for critical goods and services in the event of disruption; and (3) develop an emergency communication plan to communicate important messages to employees and constituents.
APPENDIX A

CRITICAL INFRASTRUCTURE WORKERS

Consistent with the March 19, 2020 CISA guidance document, critical infrastructure workers include some workers in each of the following sectors:

a. Health care and public health.
b. Law enforcement, public safety, and first responders. c. Food and agriculture.
d. Energy.
e. Water and wastewater.
f. Transportation and logistics.
g. Public works.
h. Communications and information technology, including news media.
i. Other community-based government operations and essential functions.
j. Critical manufacturing.
k. Hazardous materials.
l. Financial services.
m. Chemical supply chains and safety.
n. Defense industrial base.

For purposes of Executive Order 2020-42, critical infrastructure workers also include:

a. Child care workers (including workers at disaster relief child care centers), but only to the extent necessary to serve the children or dependents of workers required to perform in-person work as permitted under this order. This category includes individuals (whether licensed or not) who have arranged to care for the children or dependents of such workers.

Under Executive Order 2020-42, necessary government activities may continue, which include activities performed by critical infrastructure workers as well as the following government activities including, but not limited to, public transit, trash pick-up and disposal (including recycling and composting), activities necessary to manage and oversee elections, operations necessary to enable transactions that support the work of a business’s or operation’s critical infrastructure workers, and the maintenance of safe and sanitary public parks so as to allow for outdoor activity permitted under Executive Order 2020-42. In- person government activities are subject to the same social distancing and mitigation measures prescribed under the executive order for businesses.
b. Workers at suppliers, distribution centers, or service providers, as described below.

1. Any suppliers, distribution centers, or service providers whose continued operation is necessary to enable, support, or facilitate another business’s or operation’s critical infrastructure work may designate their workers as critical infrastructure workers, provided that only those workers whose in-person presence is necessary to enable, support, or facilitate such work may be so designated.

2. Any suppliers, distribution centers, or service providers whose continued operation is necessary to enable, support, or facilitate the necessary work of suppliers, distribution centers, or service providers described in subprovision (1) of this subsection may designate their workers as critical infrastructure workers, provided that only those workers whose in-person presence is necessary to enable, support, or facilitate such work may be so designated.

3. Consistent with the scope of work permitted under subprovision (2) of this subsection, any suppliers, distribution centers, or service providers further down the supply chain whose continued operation is necessary to enable, support, or facilitate the necessary work of other suppliers, distribution centers, or service providers may likewise designate their workers as critical infrastructure workers, provided that only those workers whose in-person presence is necessary to enable, support, or facilitate such work may be so designated.

4. Suppliers, distribution centers, and service providers that abuse their designation authority under this subsection shall be subject to sanctions to the fullest extent of the law.

c. Workers in the insurance industry, but only to the extent that their work cannot be done by telephone or remotely.

d. Workers and volunteers for businesses or operations (including both religious and secular nonprofit organizations) that provide food, shelter, and other necessities of life for economically disadvantaged or otherwise needy individuals, individuals who need assistance as a result of this emergency, and people with disabilities.

e. Workers who perform critical labor union functions, including those who administer health and welfare funds and those who monitor the well-being and safety of union members who are critical infrastructure workers, provided that any
administration or monitoring should be done by telephone or remotely where possible.

f. Workers at retail stores who sell groceries, medical supplies, and products necessary to maintain the safety, sanitation, and basic operation of residences, including convenience stores, pet supply stores, auto supplies and repair stores, hardware and home maintenance stores, and home appliance retailers.

g. Workers at laundromats, coin laundries, and dry cleaners.

h. Workers at hotels and motels, provided that the hotels or motels do not offer additional in-house amenities such as gyms, pools, spas, dining, entertainment facilities, meeting rooms, or like facilities. i. Workers at motor vehicle dealerships who are necessary to facilitate remote and electronic sales or leases, or to deliver motor vehicles to customers, provided that showrooms remain closed to in-person traffic.
APPENDIX B

SAMPLE EMPLOYEE ENTRY SCREENING QUESTIONNAIRE

1. Have you experienced any of the following symptoms in the last 3 days?

   Yes / No  Fever (temperature greater than 100.4 degrees)
   Yes / No  Atypical shortness of breath
   Yes / No  Atypical cough

   If YES to any, you are restricted from entering the building. In order to return to work, you must be both symptom-free for 3 days and 7 days must have passed since your symptoms first appeared. If NO, proceed to the next question.

2. Have you been in close contact (being within approximately six feet for a prolonged period of time) with anyone who has been diagnosed with COVID-19 or who has exhibited the above symptoms in the last 14 days?

   Yes / No

   If YES to any, you are restricted from entering the building. If NO, proceed to sign below and enter the building.

   Name:__________________________ Date: ________________
*This questionnaire is available as an online form at cornerstone.edu/coronavirus

APPENDIX C

EMPLOYEE RETURN TO WORK PLAN

Consistent with Executive Order 2020-36, employees who fail entrance screening will only be permitted to return to work under the following circumstances.

Employees who test positive for COVID-19 or display one or more of the principal symptoms of COVID-19 (fever, atypical cough, or atypical shortness of breath) will not be permitted to return to work until either:

1. Both 3 days have passed since their symptoms have resolved and 7 days have passed since their symptoms first appeared or since they were swabbed for the test that yielded the positive result; or

2. They receive a negative COVID-19 test.

Employees* who have been in “close contact” (being within approximately six feet for a prolonged period of time) with an individual who tests positive for COVID-19 or who displays one or more of the principal symptoms of COVID-19 will not be permitted to return to work until either:

1. 14 days have passed since the last close contact with the sick or symptomatic individual; or

2. The symptomatic individual receives a negative COVID-19 test.

*The “close contact” rule does not apply to the following classes of workers: health care professionals; workers at a health care facility (including hospitals, surgical centers, health maintenance organizations, nursing homes, hospice, and veteran’s facilities); first responders (e.g., police officers, fire fighters, paramedics); child protective service employees; workers at child caring institutions, as defined in MCL 722.111; and workers at correctional facilities.
Governor Whitmer’s Executive Order 2020-42:
https://www.michigan.gov/whitmer/0,9309,7-387-90499_90705-525182--,00.html

FAQs from Governor Whitmer on Executive Order 2020-42:
https://www.michigan.gov/coronavirus/0,9753,7-406-98178_98455-525278--,00.html

Helpful CDC Guidance:

CDC Handwashing Fact Sheet:

CDC Fact Sheet and Poster on Preventing the Spread of Germs:

CDC Fact Sheet on What to Do if You Are Sick:

CDC Poster for Entrance Reminding Employees Not to Enter When Sick:
APPENDIX E

Cornerstone University COVID-19
PREPAREDNESS AND RESPONSE PLAN

Certification by Responsible Public Official

This is to certify that I have reviewed Cornerstone University’s COVID-19 Preparedness and Response Plan attached hereto and to the best of my knowledge and belief:

1.) It complies with Michigan Executive Order #2020-42 dated Thursday, April 9, 2020.

2.) The plan is consistent with the guidance from the U.S. Department of Labor, Occupational Health and Safety Administration publication OSHA 3990-03-2020, Guidance on Preparing Workplaces for COVID-19.

3.) The plan is available on the Cornerstone University website at cornerstone.edu/coronavirus and in the Welch Administration Building where in-person operations take place during the COVID-19 emergency.

I declare that the foregoing is true and correct.

Signature: ____________________________

Name of Official: Peter G. Osborn

Title: Executive Vice President & Chief Operations Officer

Date: 05/01/2020