



EASTERN MICHIGAN UNIVERSITY

**COVID-19 PREPAREDNESS, RESPONSE, AND SAFE RETURN TO
CAMPUS OPERATIONS PLAN**

I. PURPOSE

- A. **Goal:** The goal of this Eastern Michigan University (“EMU” or “University”) COVID-19 Preparedness, Response, and Safe Return to Campus Operations Plan (the “Plan”) is to:
1. reduce the spread, and mitigate the impacts, of the COVID-19 virus on EMU’s campus;
 2. outline University standards for a safe, phased return to on-campus operations; and
 3. provide an outline for how the University will respond if the COVID-19 outbreak expands in the future.
- B. **Compliance:** This Plan is designed to comply with applicable executive orders (“EO”) from the State of Michigan, any other applicable government directives and guidelines, and suggestions from the “Guidance for Preparing Workplaces for COVID-19” (“OSHA Guidance”) published by the U.S. Occupational Safety & Health Administration (“OSHA”). **The information and protocols in this Plan are therefore subject to change.**
- C. **Minimizing risk exposure:** Current OSHA Guidance classifies all of the University’s employees as having either “low” or “medium” risk of workplace exposure to COVID-19. This guidance does not classify any of the University’s employees as having “high” or “very high” risk of workplace exposure to COVID-19. This Plan is therefore designed to meet the recommendations in the OSHA Guidance for mitigating “low” and/or

“medium” risk exposures for employees.

II. SCOPE & APPLICATION

- A. **University-wide application:** This Plan applies to all employees, contractors, students, and visitors at EMU.
- B. **Unit application:** Each University division/college/department (“unit”) will prepare a written plan(s) outlining the step that unit will take to comply with this Plan and other standards applicable to that unit as part of their safe phased return to on-campus operations. The content of each unit-based plan may differ because the protocols between units vary based on the type of work performed by the unit, the physical location of the unit, the unit’s office layout, government regulations that apply specifically to that unit depending on the type of work performed in the unit (e.g., office, recreational), and other relevant factors. The vice president of each division will decide which units within their division need their own plans and will appoint the individual(s) who will be responsible for developing, implementing, and enforcing such plans.
- C. This Plan and the unit plans, and the policies and practices outlined in those plans, will remain in effect until otherwise determined by the University.

III. IMPLEMENTATION

- A. **Publication:** This Plan or a modified version of it will be published as follows (Ref: EO 2020-114 Sec. 1(a)):
 - 1. Website: <https://www.emich.edu/coronavirus/>
 - 2. Hard copy: Individuals may request a copy of this Plan by contacting Kathryn Wilhoff, Director of Environmental Health & Safety (“EHS”), at kwilhoff@emich.edu or 734-487-0794.
- B. **Supervision:** The following individuals and departments are designated to implement, monitor, and report on the strategies developed under this Plan. (Ref: EO 2020-114 Sec. 1(b)):

1. Each unit's plan shall identify the employee(s) responsible for ensuring compliance with that unit's plan.
2. Deans, Directors, Department Heads, Executive Directors and Vice Presidents shall provide assistance and support to this Plan and their unit plan(s), and shall empower the designated supervisor(s) for their units to achieve compliance with these plans.
3. University Human Resources shall provide guidance and assistance to this Plan and the unit plans for issues regarding sick time, employee non-compliance concerns, claims of disparate treatment or retaliation, or other similar concerns. The contact is hr_employment@emich.edu.
4. The Dean of Students shall provide guidance and assistance to this Plan and unit plans for issues regarding COVID-19 reporting. The contact is Ellen Gold, Dean of Students, at emu_deanofstudents@emich.edu.
5. The Office of Wellness and Community Responsibility shall provide guidance and assistance regarding student non-compliance issues. The contact is emu_owcr@emich.edu.
6. EMU's Office of Environmental Health and Safety is responsible for oversight of compliance with this Plan and its control strategies and assisting units with compliance concerns. The contact is Kathryn Wilhoff, Director of Environmental Health & Safety ("EHS"), at kwilhoff@emich.edu or 734-487-0794.

IV. UNIVERSITY POLICIES AND PRACTICES

A. Training:

1. **Policy:** Employees covered by this Plan who return to work on campus will complete training that covers, at a minimum, workplace-infection control practices, the proper use of protective equipment, steps an employee must take to notify the University of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19, and how to report unsafe working conditions. Training may be customized for various employees depending on the nature

of their work. Training may be delivered online through the University's Bridge portal, in paper format, or verbally. Training should be documented in writing. (Ref: EO 2020-114, Sec. 1(c).

2. **Implementation:** Each unit shall designate a supervisor(s) who is responsible for ensuring that covered employees complete the required training and maintaining records of such training.
3. **Enforcement:** Questions regarding training should be directed to the employee's supervisor. Questions or issues regarding Bridge training should be directed to University Human Resources (cdotson@emich.edu). For assistance with training or questions regarding COVID training, contact Environmental Health and Safety at 734-487-0794. . Compliance will be monitored by departmental administration, University Human Resources and Environmental Health and Safety, as applicable.

B. Daily Entry Self-Screening: EMU has implemented the following systems to ensure that employees and contractors who work on campus, and all students and visitors, complete a daily self-screening protocol. (Ref: EO 2020-114 Sec. 1(d)):

1. **Transition period**

- a) In March 2020, EMU developed a screening form – available both online and in paper form – to be completed by employees who work on-campus before they arrive on campus.
- b) The form was prepared based on guidance from the Washtenaw County Health Department and asks employees several questions whether they have specific symptoms of COVID-19 and about their possible recent exposure to COVID-19. The online form can be found here: https://docs.google.com/forms/d/e/1FAIpQLSc3q9jJpHHcbdydrJBGadHTklhKhMV8_Y-ELkB4tc7XvySh7g/viewform
- c) During the current transition period, employees are required to complete the form every day on which they intend to come

to campus, before arriving on campus.

- d) After an employee completes this form, the completed form is automatically sent via e-mail to the employee's supervisor for review and approval.
- e) The form instructs employees who have identified symptoms of COVID-19, or who may have been exposed to the disease through travel or close contact, not to come to campus.

2. Phased safe return to on-campus operations

- a) The University will continue to use daily health screening in the fall to help mitigate the spread of COVID-19. This strategy has been successful in grocery stores, hospitals, and elsewhere. The specific details of this screening procedure are being developed, will be updated in this Plan before fall, and will be communicated broadly to campus stakeholders.

C. **Physical distancing:** EMU has implemented the following protocols to encourage "physical distancing" of six feet or more between individuals on campus. (Ref: EO 2020-114 Sec. 1(e))

1. **Policy:** All individuals on University grounds must maintain physical distance of six feet or more from other individuals whenever safely possible.
2. **Classrooms:** Individual classrooms are being evaluated to assess new capacity restrictions and seating configurations to allow for physical distancing. The outcome will be different for every classroom based on its configuration, whether furniture is fixed or movable, etc.
3. **Building common areas:** The Facilities Division will assess on a building-by-building basis whether there should be designated entry points, exit points, hallway traffic management including single-direction traffic flow, and other standards to promote physical

distancing based on each building's unique layout and use.

4. **Communication:** This policy shall be communicated to students and employees through a variety of channels, including but not limited to, website, e-mail, and signage. Signage to promote this policy, including floor markings to note six-foot distancing, has been developed by the Communications & Marketing Division and is available to staff who are charged with placing signage as follows:
 - a) **Public areas:** The Facilities Division will place appropriate signage to promote physical distancing in public areas, such as building entrances, elevators, and public restrooms.
 - b) **Units:** Unit supervisors will select and place appropriate signage to promote physical distancing in their individual unit areas.

5. **Enforcement:** Enforcement of these protocols shall occur as follows:
 - a) Students who do not comply with this policy are subject to the University's Code of Community Responsibility. Questions regarding enforcement involving students should be directed to the Office of Wellness & Community Responsibility at emu_owcr@emich.edu or 734-487-2157.
 - b) Employees who do not comply with this policy are subject to disciplinary action as outlined in applicable University Board policies, administrative policies, and collective bargaining agreements. Questions regarding enforcement involving employees should be directed to University Human Resources at hr_employment@emich.edu.
 - c) Other questions about safety related to this policy may be directed to the Office of Environmental Health and Safety (kwilhoff@emich.edu or 734-487-0794).

6. **Unit standards:** Each unit shall, as part of its unit-based plan, apply these standards for that unit based on the layout of office(s), interaction with visitors, etc. These unit-based plans shall also include information about the placement of signage, placement of physical barriers (if any), work schedules, and other practices within the unit's work space to encourage compliance with this policy.

D. **Face coverings:** EMU has implemented the following protocols regarding the wearing of face coverings while on campus. (Ref: EO 2020-144 Sec. 1(f) and 1(g))

1. **Policy:**

- a) All individuals must wear a face covering inside any EMU enclosed public space whenever they are in close proximity (e.g., six feet or less) of any other individual unless the individual is in a closed/isolated space (e.g., private office) and another individual is not present. For purposes of this policy, enclosed public spaces include, but are not limited to, classrooms, building corridors, stairways, hallways, restrooms, conference rooms, waiting rooms, offices, office suites, and vehicles with more than one occupant.
- b) The vast majority of the University's employees are neither required nor expected to wear an N-95 mask based on their job duties. Employees who are required to wear an N-95 mask as part of their job will be provided with a mask by the University. Employees who are not required to wear an N-95 mask as part of their job, but nonetheless choose to do so while working, must notify the Office of Environmental Health & Safety (kwilhoff@emich.edu). Supervisors of such employees must also notify the Office of Environmental Health & Safety (kwilhoff@emich.edu).

2. **Accommodation:** An individual who believes that they have a medical condition that prohibits them from wearing a face covering shall contact the following office to request an accommodation excusing them from, or allowing them to modify their compliance with, this policy:

- a) Students must contact the Disability Resource Center at drc@emich.edu.
- b) Employees must contact the Office of University Human Resources at hr_employment@emich.edu.

3. **Availability:** To promote compliance with this policy, the University shall make face coverings available to all students and employees.

Each unit will include in its unit plan details for obtaining and distributing face coverings for individuals who interact with that unit (e.g., employees, visitors).

4. **Communications:** This requirement shall be communicated to students and employees through a variety of channels, including but not limited to, website, e-mail, and signage. Signage to promote this policy has been developed by the Communications & Marketing Division and is available to staff who are charged with placing signage as follows:
 - a) **Public areas:** The Facilities Division will place appropriate signage in public areas to promote the wearing of face coverings.
 - b) **Units:** Unit supervisors will select and place signage in their individual unit areas to remind individuals about the requirement to use face coverings.
5. **Enforcement:** Enforcement of these standards shall occur as follows:
 - a) Students who do not comply with this policy are subject to the University's Code of Community Responsibility. Questions regarding enforcement involving students should be directed to the Office of Wellness and Community Responsibility at emu_owcr@emich.edu or 734-487-2157.
 - b) Employees who do not comply with this policy are subject to disciplinary action as outlined in applicable University Board policies, administrative policies, and collective bargaining agreements. Questions regarding enforcement involving employees should be directed to University Human Resources at hr_employment@emich.edu.
 - c) Other questions about safety related to this policy may be directed to the Office of Environmental Health and Safety (kwilhoff@emich.edu or 734-487-0794).
6. **Unit standards:** Each unit shall, as part of its unit-based plan, apply these standards for that unit based on the layout of office(s), interaction with visitors, etc. These unit-based plans shall also include information about the placement of signage within the unit's

work space to encourage compliance with this policy.

E. **Hygiene etiquette:** EMU has implemented the following protocols to encourage employees to use proper personal hygiene. (Ref: EO 2020-114, Sec. 1(j); OSHA Guidance)

1. **Policy:** The University encourages all students, employees, and visitors to regularly wash their hands with soap and water for at least 20 seconds, use hand sanitizer when needed (but not in lieu of handwashing when soap and water are available), use tissues as needed to manage coughing and sneezing, and to properly manage coughing/sneezing pursuant to health guidelines (e.g., coughing into your sleeve/elbow)
2. **Availability:** The University's Facilities Division shall ensure that public restrooms are equipped with soap for hand washing. The University's Facilities Division shall install and maintain hand sanitizer stations inside buildings across campus. The specific locations of hand sanitizer stations will vary by building based on the building's size, layout, and use. Individual offices may purchase hand sanitizer and tissues for the office(s) covered by their unit plan(s).
3. **Communications:** This policy shall be communicated to students and employees through a variety of channels, including but not limited to, website, e-mail, and signage. Signage to promote this policy has been developed by the Communications & Marketing Division and is available to staff who are charged with placing signage as follows:
 - a) **Public areas:** The Facilities Division will place signage in public areas to promote personal hygiene.
 - b) **Units:** Unit supervisors will select and place signage in their individual unit areas to promote personal hygiene.
4. **Enforcement:** If hand washing supplies need refilling, or sanitizer or tissues are not available in a specific public area, individuals may contact Dieter Otto at Dotto@emich.edu.

5. **Unit standards: Each unit is responsible for procuring and placing hand sanitizer and tissues in its office(s).** Each unit shall, as part of its unit-based plan, note the nearest location(s) for employees to wash their hands, obtain hand sanitizer, and obtain tissues. The standards for each unit plan will differ based on the layout of office(s), location of sinks, number of employees, etc. These unit-based plans shall also include information about the placement of signage within the unit's work space to encourage the protocol outlined in this policy.

F. **General cleaning standards:** EMU has implemented the following protocols for enhanced facility cleaning. (Ref: EO 2020-114 Sec. 1(h))

1. **University standards:** All EMU public areas (e.g., restrooms, hallways, etc.) are cleaned more frequently compared to the time period before COVID-19. In addition to increasing the frequency of cleaning, the type of cleaning has also been enhanced. For example, disinfectant fogging is used in large areas and touch points (e.g., light switches and door handles) are cleaned on a regular basis. The standards for each building vary based on the building size, layout, use, and other relevant criteria. Cleaning standards may evolve depending on the time of year, day of the week, modifications to University policies and government regulations, and other relevant criteria. Dieter Otto, Director of Custodial Services & Grounds, (dotto@emich.edu), oversees the University's cleaning process.
2. **Unit standards:** The precise type and frequency of cleaning within various units varies based on a variety of relevant criteria which include, but are not limited to, whether the office is open to the public, the number of people who work in and visit the office on a daily basis, etc. The standards also change based on the time of year, day of the week, modifications to University policies and government regulations, and other relevant criteria. For example, classroom buildings are cleaned more frequently between Monday-Thursday during the fall and winter semester. Individuals may contact Dieter Otto, Director of Custodial Services & Grounds (dotto@emich.edu), for information about the type and frequency of cleaning for a specific building or office.

Each unit shall, as part of its unit-based plan, include standards to require employees to clean shared spaces at least twice per day (see also Section IV(M)).

G. Notice of positive cases: EMU has implemented the following notification protocols when an individual tests positive for COVID-19. (Ref: EO 2020-114 Sec. 1(k))

1. Employees who test positive for COVID-19 shall notify the following individuals:
 - a) Their supervisor (only to inform the supervisor that the employee is ill); and
 - b) The Office of the Dean of Students at emu_deanofstudents@emich.edu.
2. Students who test positive for COVID-19 shall notify the following individuals:
 - a) Their supervisor (if they are employed on campus, and only to notify the supervisor that the student is ill); and
 - b) The Office of the Dean of Students at emu_deanofstudents@emich.edu.
3. The Office of the Dean of Students is responsible for maintaining records of positive cases of COVID-19 involving University employees and students, and for notifying the Washtenaw County Health Department about all known cases of a COVID-19 positive test involving an employee or student on the University's campus.
4. All notifications to impacted individuals who have come in contact with an individual who has tested positive for COVID-19 will be coordinated by the Office of the Dean of Students and completed in coordination with, and at the direction of, the Washtenaw County Health Department.
5. The University will not announce individual positive test results via campus message as a matter of course. Privacy considerations restrict communication about individual cases. The University understands that many people will want to know where the

individual was on campus and who they may have interacted with. As stated above, all notifications to impacted individuals who have come in contact with an individual who has tested positive for COVID-19 will be coordinated by the Office of the Dean of Students and completed in coordination with, and at the direction of, the Washtenaw County Health Department.

H. **Cleaning standards in the event of a COVID-19 positive test:** EMU has implemented the following protocols to disinfect areas where an individual who has tested positive for COVID-19 is known to have visited during relevant time periods as identified through contact tracing. (Ref: EO 2020-114 Sec. 1(i))

1. **Employees:** If the University is notified that an employee has tested positive for COVID-19, the University's Facilities Division disinfects the employee's work area, all touch points in the building where the employee worked, and any other areas (e.g., classroom) where the employee recently visited as identified through contact tracing coordinated by the Washtenaw County Health Department. This cleaning process includes, where applicable, fogging of entire rooms or buildings.
2. **Students and visitors:** If the University is notified that a student or visitor has tested positive for COVID-19, the University's Facilities team disinfects the student's residence hall room/apartment (if applicable), and any other areas (e.g., classrooms) where the student or visitor recently visited as identified through contact tracing. This cleaning process includes, where applicable, fogging of rooms, hallways, or buildings.
3. **Enforcement:** The cleaning processes outlined in this section are managed by Dieter Otto, Director of Custodial Services & Grounds (DOtto@emich.edu).

I. **Staying home if sick:** The University has established the following protocols to ensure that employees who are sick stay home, and that employees with a confirmed or suspected case of COVID-19 return to the workplace only after they are no longer infectious. (Ref: EO 2020-114 Sec.

1(l) and 1(m); OSHA Guidance)

1. Employees who are sick should stay home until symptoms pass and isolation times, if applicable, have passed. Employees who are sick should notify their supervisor.
 2. If an employee is sick or becomes sick at work, they should notify their supervisor immediately and make arrangements to go home as soon as possible. They should avoid contact with other individuals as much as possible and remain home until symptoms pass and isolation times, if applicable, have passed.
 3. To promote compliance with these policies, the vast majority of EMU's workforce has access to paid sick time as outlined in Board Policy 3.2.5 (for non-bargained-for employees) and the collective bargaining agreements (for employees employed in a collective bargaining unit).
 4. The University does not retaliate against employees (through discharge, discipline or otherwise) who stay home or leave work when they are sick, or when they are at particular risk of infecting others with COVID-19. University Human Resources (hr_employment@emich.edu) is responsible for ensuring compliance with this policy and investigating allegations that this policy has been violated.
 5. Units that work with external contractors shall encourage those contractors to instruct their employees who may be assigned to work on-site at the University to stay home if they are sick and to immediately report to their University contact any instance when an employee assigned to work on-site at the University has tested positive for COVID-19.
- J. **Response plan for COVID-19 positive cases:** The University has established the following protocols for dealing with a confirmed infection of COVID-19 in the workplace. (Ref: EO 2020-114 Sec. 1(n))
1. As outlined in Section IV(G) of this Plan (above), employees who test positive for COVID-19 must notify their supervisor and the

Office of the Dean of Students (emu_deanofstudents@emich.edu). Students who test positive for COVID-19 must notify their supervisor (if they are employed on campus) and the Office of the Dean of Students (emu_deanofstudents@emich.edu).

2. As outlined in Section IV(H) of this Plan (above), the University has established cleaning protocols for when the University learns that an employee, student, or visitor tests positive for COVID-19.
3. As outlined in Section IV(I) of this Plan (above), the University has established protocols for employees to remain at home if they test positive for COVID-19.
4. The University will close certain buildings and/or the campus in the event of a COVID-19 positive case based on the scope of any outbreak of COVID-19 and in consultation with the Washtenaw County Health Department. The decision to close a building and/or the campus in this context is made by the President of the University.
5. In addition to these protocols for responding to instances when an employee tests positive for COVID-19, the University's Office of Housing & Residence Life will, as part of its unit plan, include standards for isolating students who test positive for COVID-19 and who live in the University's residence halls and/or apartments.
6. As outlined in Section IV (G) of this Plan (above), the University will not announce via campus message individual positive test results as a matter of course. As stated above, all notifications to impacted individuals who have come in contact with an individual who has tested positive for COVID-19 will be coordinated by the Office of the Dean of Students and completed in coordination with, and at the direction of, the Washtenaw County Public Health Department.

K. **Travel:** The University has established the following protocols regarding travel.

1. Since March 2020, the University has prohibited all University-sponsored air travel by employees and students.

Requests to travel by air for essential work must be reviewed and approved by the Chief Financial Officer and/or Executive Vice President & Provost. (Ref. EO 2020-114 Sec. 1(o))

2. Students and employees who use public transportation (e.g., buses) are encouraged to: always wear a face covering; practice physical distancing at all times; and wash their hands after their trip or, if soap and water are not readily available, carry and use hand sanitizer immediately after their trip. The University shall communicate these guidelines in the fall semester to the campus community through a variety of channels including, but not limited to, website, e-mail, and signage. (Ref: EO 2020-114 Sec. 1(p))

L. **Remote work and flexible work:** The University has established the following policies and practices to promote remote work. (Ref: EO 2020-114 Sec. 1(q); OSHA Guidance).

1. Beginning March 16, 2020, all University employees began working remotely except for those employees performing critical infrastructure or minimum basic operations work. That policy remains in effect through the end of July 2020 with limited exceptions that are reviewed and granted by supervisors and University administrators on a case-by-case basis to ensure compliance with applicable government guidance.
2. Employees are encouraged to hold meetings via Zoom whenever possible. In-person meetings should not occur except in rare cases and, in such rare cases, the other protocols outlined in this Plan must be followed (e.g., physical distancing, face coverings, health screening before coming to campus, etc.).
3. The University will phase in a return to on-campus operations on a unit basis. The timing will vary based on the nature of the unit's work and other details outlined in unit plans.
4. After a unit resumes on-campus operations, employees will be encouraged to work remotely when possible through the following practices:

- a) Each unit will, in its unit plan, outline details regarding remote work and flexible work schedules, if any, for employees in that unit.
- b) The University has developed a [dedicated website](#) to outline the technologies available to support remote work.
- c) The University has secured technology to enhance remote work, including, but not limited to, doubling VPN capacity, a campus-wide Zoom license, a process for employees to bring desktop computer equipment home, softphone software that allows employees to make and receive telephone calls from their computer using their University telephone number, and voicemail forwarding to email.
- d) The University will continue to encourage employees through various communications (e-mails, website, etc.) to conduct meetings remotely (in part or in full) whenever practicable.

M. Discourage equipment sharing: As suggested in the OSHA Guidance, each unit shall as part of its unit plan, include applicable information to discourage employees from sharing equipment whenever possible. Equipment in this context includes, but is not limited to, telephones, computer devices, and copier machines. In instances when equipment must be shared, each unit shall include standards in its unit plan to mandate that employees clean shared spaces at least twice per day. (Ref: EO 2020-114 Sec. 7(g); OSHA Guidance)

N. Unsafe working conditions: Employees who believe they are subject to unsafe working conditions, or who have concerns regarding compliance with the University's COVID-19 plans as applied, should immediately contact their supervisor, followed by, if needed, that individual's supervisor. Employees who have contacted their supervisor(s) with concerns may also contact the Office of Environmental Health and Safety (kwilhoff@emich.edu or 734-487-0794).

Date: June 30, 2020