# COVID-19 Preparedness & Response Plan

# For Lower and Medium Exposure Risk Employers ONLY

**General**

The following COVID-19 preparedness & response plan has been established for Alta Equipment Company 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. Christine Miller has read these emergency rules carefully, developed the safeguards appropriate to Alta Equipment Company based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

Alta Equipment Company has designated one or more worksite supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan. The worksite supervisor(s) is a branch or service manager. The supervisor will remain on-site at all times 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 internal website and/or hard copy.

**Exposure Determination**

Alta Equipment Company 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. Christine Miller was responsible for the exposure determination.

Alta Equipment Company 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.

Christine Miller verifies that Alta Equipment Company 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.

Alta Equipment Company 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.

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| **Job/Task** | **Exposure Risk Determination  (Lower or Medium)** | **Qualifying Factors**  **(Ex. No Public Contact, Public Contact)** |
| Shop Tech | Lower | No Public Contact |
| Truck Driver | Lower/Medium | No Public Contact/Public Contact |
| Field/Road Tech | Lower/Medium | No Public Contact/Public Contact |
| Parts Clerk | Lower/Medium | No Public Contact/Public Contact |
| Parts Mgr | Lower | No Public Contact |
| Service Admin | Lower | No Public Contact |
| Service/Branch Mgr | Lower | No Public Contact |
| **Job/Task** | **Exposure Risk Determination  (Lower or Medium)** | **Qualifying Factors**  **(Ex. No Public Contact, Public Contact)** |
| Account Mgr | Medium | Public Contact |
| Yard Specialist | Lower/Medium | Public Contact |
| Office/admin | Lower | No Public Contact |
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**Engineering Controls**

Alta Equipment Company 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. In workplaces where they are appropriate, these types of controls reduce exposure to hazards without relying on worker behavior and can be the most cost-effective solution to implement.

For lower exposure risk jobs, new engineering controls are not required. For medium exposure risk jobs, engineering controls can include:

■ Installing physical barriers (such as clear plastic sneeze guards) between coworkers or between workers and customers.

■ Installing a drive-through window for customer service.

■ Increasing the amount of ventilation in the building.

■ Increasing the amount of fresh outdoor air that is introduced into the building.

Branch/Service Manager will be responsible for seeing that the correct engineering controls are chosen, installed, maintained for effectiveness, and serviced when necessary.

The following engineering controls have been implemented:

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| **Job/Task** | **Engineering Control** |
| Internal Parts Distribution | Physical barrier between workers as well as lockers to place parts in the place of face to face contact. |
| Customer Parts Distribution | Drive up parts delivery to the customer in the parking lot. Reduced on site exposure in the branch. Also, have the physical barrier in the event a customer comes into the building. |
| Break room and common area spacing | Removed seats in common areas as well as designated spacing in common areas. |
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**Administrative Controls**

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. Branch/Service Manager will be responsible for seeing that the correct administrative controls are chosen, implemented, and maintained for effectiveness.

The following administrative controls have been established for Alta Equipment Company:

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| **Job/Task** | **Administrative Control**  **(For Example, Workplace Distancing, Remote Work, Notifying Customers)** |
| 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 | Promote remote work (telecommuting) to the fullest extent possible. |
| All employees | Establish alternating days or extra shifts to reduce the total number of employees in the facility at a given time. |
| 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. |
| All employees | Restrict the number of customers 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 (cloth face coverings). |
| All employees | Require employees to wear cloth face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace. |
| All employees | Require customers and the public to wear cloth face coverings. |
| All employees | Keep customers informed about symptoms of COVID-19 and ask sick customers to stay at home until healthy again. Encourage sick customers to use drive-through services, curbside pickup, or home delivery. |
| All employees | Encourage customers to place orders for merchandise or services through the phone or web. |
| All employees | Encourage proper 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. |
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**Hand Hygiene**

Branch/Service Manager will be responsible for seeing that adequate handwashing facilities are available in the workplace and that regular handwashing 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, Alta Equipment Company shall provide employees with antiseptic hand sanitizers or towelettes. Alta Equipment Company will provide time for employees to wash hands frequently and to use hand sanitizer.

Alta Equipment Company shall promote frequent and thorough hand washing, including by providing workers, customers, 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**

Alta Equipment Company 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 (for example tools, machinery, vehicles). Alta Equipment Company will make cleaning supplies available to employees upon entry and at the worksite.

Branch/Service Manager will be responsible for seeing that environmental surfaces in the workplace are cleaned and disinfected. Frequency of such 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, Alta Equipment Company 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:

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| **Surface** | **Method/Disinfectant Used** | **Schedule/Frequency** |
| Counter tops | Bleach based solution | At least Daily |
| Door handles | Bleach based solution | At least Daily |
| Desktops | Bleach based solution | At least Daily |
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Alta Equipment Company will perform enhanced cleaning and disinfection after persons confirmed to have COVID-19 have been in a work area. In the interim, that work area will be temporarily closed, and employees will be sent home or relocated. Branch/Service Manager will be responsible for seeing that this protocol is followed.

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

***Utilize an external cleaning company to do some or all of the following:***

* ***Conduct fogging of the building or area that is required;***
* ***Undergo and additional wipe down of high touch areas;***

**Personal Protective Equipment (PPE)**

Alta Equipment Company will provide employees with the types of personal protective equipment, including 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.

Alta Equipment Company will provide non-medical grade face coverings (cloth face coverings) to employees (cloth face coverings are technically not considered PPE). Alta Equipment Company will require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace. Alta Equipment Company will consider face shields when appropriate or requested by an employee.

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

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| **Job/Task** | **PPE** |
| All Jobs | Masks |
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**Health Surveillance**

Alta Equipment Company 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,together with, if possible, a temperature screening. Branch/Service Manager will be responsible for ensuring that all required health surveillance provisions are performed.

As workers enter the place of employment at the start of each work shift, Alta Equipment Company will have employees self-screen for COVID-19. Alta Equipment Company 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 obtainable, a no-touch thermometer will be used for temperature screening of employees. Alta Equipment Company 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 immediate supervisor before and during the work shift. Alta Equipment Company 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:

* Please see Alta’s COVID Protocols for details.

Alta Equipment Company 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.

Alta Equipment Company 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, Branch/Service/Operations Manager 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, Alta Equipment Company will not reveal the name or identity of the confirmed case unless authorized by that employee.

Alta Equipment Company 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.

**Training**

Safety/Operations Manager shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

Alta Equipment Company 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.

Safety Manager shall create a record of the training. Records should include the name of the employee(s) trained and the date of the training.

**Recordkeeping**

Alta Equipment Company 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.

Safety Manager will ensure that the records are kept.

**Work from Home**

Employees that are able to work from home must work from home. If there is a need to be in the office, you are to speak with your manager and request approval. If you do not have the ability to work from home due to not having the technical requirements, equipment or anything else required to work remote then we will allow you to work in the office. If there is something that Alta Equipment Company can support in allowing you to work from home, please make this request to your manager. The company will try and support any reasonable requests to make remote work a possibility.

Jobs that cannot work from home:

* Service based positions: Branch Managers, Service Managers, Dispatchers, Service Admin, Technicians, Shop Supervisors, CDL Drivers
* Parts based positions: Parts Manager, Parts Supervisor, Parts Clerks