

COVID-19 Preparedness and Response Plan

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Purpose

The following COVID-19 preparedness & response plan has been established for Proos in accordance with MIOSHA Emergency Rules for Coronavirus disease 2019 (COVID-19). The purpose of this plan is to minimize or eliminate exposure to SARS-CoV-2.

The Emergency Rules have general safeguards applicable for all workplaces and specific safeguards for Manufacturing employers. Proos' Chief of Staff, Alisha Warner, has read these emergency rules carefully, developed the safeguards appropriate to Proos, and has incorporated those safeguards into this COVID-19 preparedness & response plan.

Proos has designated one or more COVID-19 Safety Coordinators to implement, monitor and report on the COVID-19 control strategies developed in this plan. One or more COVID-19 Safety Coordinators will always remain onsite when employees are present on site.

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This plan will be provided to all new employees. The plan will be made available via a shared network. Changes to this plan will be communicated via email and bulletin board notices.

COVID-19 Safety Coordinators

Proos has assigned the following employees as COVID-19 Safety Coordinators.

COVID-19 SAFETY COORDINATORS		
Facility	Shift	COVID-19 Safety Coordinator(s)
Ball	1st	Kristafer Fox
Dodge	1st	Rik Evans Alexandra Evans
Industrial	1st	Jason Vanderklok Alisha Warner/Cerria Rozeboom
Industrial	3rd	Zeb Snow Joel Zwylghuizen

Plan Updates and Expiration

This plan responds to the COVID-19 outbreak. Proos will update this Plan and its corresponding processes on an as-needed basis.

This plan will expire upon conclusion of its need, as determined by Proos and in accordance with guidance from local, state, and federal health officials.

Exposure Determination

Proos 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.

Proos has determined that its employee's jobs fall into only the lower exposure and medium exposure risk categories as defined by the OSHA Guidance on Preparing Workplaces for COVID-19. Proos does not have any high exposure risk jobs (high potential for exposure to known and suspected cases of COVID-19).

Lower Exposure Risk Jobs

These jobs do not require contact with known or suspected cases of COVID-19 nor frequent close contact with the public. Workers in this category have minimum contact with other co-workers.

Medium Exposure Risk Jobs

These jobs are those that require frequent or close contact with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients.

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Proos has categorized its jobs as follows:

Department	Exposure Risk
Assembly	Medium
Continuous Improvement	Low
Electrical	Low
Engineering	Low
Accounting/Human Resources	Low
Inventory	Low
IT/Logistics	Low
Laser	Low
Laser Unload	Medium
Maintenance	Medium
Material Handling	Low
Operations Mgt and Supervision	Low
Paint Line	Medium
Press Brake	Low
Quality	Low/Medium
	*Management is low exposure
Purchasing/Sales	Low
Project Management/Coordination	Low
Scheduling	Low
Stamp	Low
Tool Crib	Low/Medium
	*2+ employees in the area = medium exposure risk
Weld	Low

Engineering Controls

Proos has implemented the following engineering controls to minimize employee exposure to COVID-19.

- Altered the exhaust fans to run 100% of the time to increase the airflow in the building.

Administrative Controls

Proos has implemented the following policies, procedures, and practices to minimize or eliminate employee exposure to COVID-19.

Job/Task	Administrative Control
All employees	Proos will ensure workspaces are 6 feet apart whenever possible.
All employees	Proos will prohibit in-person work when tasks can be performed remotely.
All employees	Proos will provide non-medical grade face coverings at no cost to the employee.

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All employees	Proos will require employees to wear cloth face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.
All employees	Proos will require customers and the public to wear cloth face coverings.
All employees	Proos will enforce social distancing whenever possible, including during lunch and break periods and during clock-in and clock-out.
All employees	Proos will restrict business-related travel for employees to essential travel only.
All employees	Proos will require staggered meal and break times.
All employees	Proos will limit in-person meetings and require phone, email, or web/video conferencing whenever possible.
All employees	Proos will restrict visitors to essential visitors only.
All employees	Proos will require employees to wear masks in shared spaces, including during in-person meetings and in restrooms and hallways.
All employees	Proos will minimize the sharing of tools and equipment where possible.
All employees	Proos will use ground markings, signs, and physical barriers to remind employees to remain 6 feet from others.

Disinfection of Environmental Surfaces

Proos will increase facility cleaning and disinfection to limit exposure to COVID-19. Proos will make cleaning supplies available to employees as requested.

Proos has contracted with a 3rd party for workplace cleaning and disinfection. Proos will clean and disinfect all facilities 5-days a week. Proos will ensure cleaning and disinfecting of high-touch surfaces and the 3rd party will choose cleaning chemicals that have EPA-approved disinfect labels with claims against emerging viral pathogens.

Proos has also contracted with a 3rd party to perform enhanced cleaning and disinfecting after persons confirmed to have COVID-19 have been in the work area. Purchasing is responsible for scheduling this, upon notification from HR.

Personal Protective Equipment (PPE)

Proos will provide employees with the types of PPE appropriate to the exposure risk associated with the job.

Proos will provide non-medical grade face coverings (cloth face coverings) to employees and require employees to wear face covering when they cannot consistently maintain six feet of separation from other individuals in the workplace.

Hygiene

Proos will promote frequent and thorough hand washing and will provide employees, visitors, suppliers, and contractors with a place to wash their hands. Proos will also provide hand sanitizer containing at least 60 percent alcohol in high traffic areas and when soap and water are unavailable.

Additionally, Proos will promote respiratory etiquette and will ask employees to refrain from touching their eyes, nose, and mouth and to refrain from physical contact, such as handshakes.

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Health Surveillance

Proos will conduct a daily entry self-screening protocol for all employees, visitors, suppliers, and contractors entering the workplace. The protocol will cover symptoms and exposure to suspected or confirmed cases of COVID-19. The protocol will also include a temperature screening. The COVID-19 Safety Coordinators, Supervisors and Managers will be responsible for ensuring that all required health surveillance provisions are performed.

Daily Self-Screening

Employees, visitors, suppliers, and contractors will complete a health screening prior to entering the workplace each day. Health screens will be completed verbally or electronically. The health screening will cover symptoms of COVID-19; exposure to suspected or confirmed cases of COVID-19; and COVID-19 testing for which results are still pending. Employees will also participate in temperature screening.

Employees are provided with training on how to report symptoms of COVID-19 and/or exposure to COVID-19.

- Employees are required to notify HR immediately if they develop COVID-19 symptoms and/or were exposed to a suspected or confirmed case of COVID-19.
- Employees are prohibited from entering the workplace if they are symptomatic or have been exposed to COVID-19.
- If employees develop symptoms at work or learn that that were exposed at work, they must leave the workplace immediately and stay home.
- Employees will be required to self-isolate or quarantine in accordance with the most recent CDC guidance.

Confirmed Cases

When an employee is identified with a confirmed case of COVID-19, Proos will notify the Kent County Health Department. Proos will clean and disinfect all areas associated with a confirmed case of COVID-19 and will notify any co-workers, visitors, suppliers, or contractors who may have had contact with the person who is the confirmed case of COVID-19, within 24 hours of learning of the confirmed case. Proos will perform contact tracing and direct any close contacts to begin quarantine in accordance with the most recent CDC guidance. Proos will maintain confidentiality in accordance with all HIPAA regulations.

Proos will monitor all confirmed cases of COVID-19.

Contact Tracing

Upon learning of a confirmed case of COVID-19, Proos will perform contact tracing through verbal discussions with the confirmed case, as well as through reviewing data collected via the Instant-Trace badge system.

Return to Work Requirements

Proos 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 CDC guidance.

Retaliation

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

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Training

The Chief of Staff shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

Proos will train workers on:

- What SARS-CoV-2 is and how it is transmitted
- How employees can protect themselves and others
- Symptoms of SARS-CoV-2 and what employees should do if they are sick
- What employees should do if they are exposed to SARS-CoV-2
- When employees should stay home from work
- When employees can return to work after self-isolation or quarantine
- Worker exposure classification
- Workplace infection preventative measures
- How to wear a mask
- How to report unsafe working conditions

The HR Coordinator shall create a record of the training. Records should include the name of the employee(s) training and the date of the training.

Recordkeeping

Proos will maintain records of the following requirements:

- COVID-19 employee training records.
- Screening records for all employees and visitors entering the workplace.
- Records of notifications to the Kent County Health Department when an employee is identified with a confirmed case of COVID-19.
- Records of notifications to co-workers, contractors, or suppliers who may have come in to contact with an employee with a confirmed case of COVID-19.

In-Person versus Remote Work

Proos prohibits in-person work for employees who can perform their work remotely. The chart below identifies which positions must report for in-person work and why they must be physically present in the workplace.

Proos will not consider productivity, efficiency or additional costs when determining which positions must report for in-person work and which position must work remotely.

Proos is a critical manufacturer. Most employees work on the manufacturing floor and must be on-site where the product is manufactured. Employees who can perform most duties remotely may also be required to come on-site to provide support on the manufacturing floor in various situations, as noted below. New employees who are in an orientation and training period will be required to come on-site.

Position	In-Person/Remote	Assessment Details
Accounting	Remote In-Person as Needed	Employees can feasibly perform most duties remotely. The Accounting team will need to come on site as needed to print and sign checks and scan documents.

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Assembly	In-Person	Employees cannot feasibly perform any work remotely. Employees in this department work on the manufacturing floor and must be on site where the product is manufactured.
Continuous Improvement	In-Person	Employees cannot feasibly perform work remotely. The continuous improvement team needs to communicate and engage with operations to complete continuous improvement projects.
CNC Programming	Remote In-Person as Needed	Employees can feasibly perform most duties remotely. Employees may have to come on-site to assist with on-site programming as needed.
Drivers	In-Person	Employees cannot feasibly perform any work remotely.
Design Engineering	Remote In-Person as Needed	Employees can feasibly perform most duties remotely. Employees may have to come on-site as needed to review or troubleshoot designs on the manufacturing floor.
Electrical	In-Person	Employees cannot feasibly perform any work remotely. Employees in this department work on the manufacturing floor and must be on site where the product is manufactured.
Human Resources	Remote In-Person as Needed	Employees can feasibly perform most duties remotely. The HR team will have one person on site each day to act as the COVID-19 Safety Coordinator. Additionally, the HR team will need to come on site as needed to perform new employee orientation, benefits enrollment, training, and attend employee training and meeting that cannot be done remotely.
Inventory	In-Person	Employees cannot feasibly perform work remotely. The inventory team needs to visually verify and inspect all parts before any inventory transaction can be made.
Information Technology	In-Person	Employees cannot feasibly perform work remotely. IT Help Desk issues require on-site presence for resolution.
Laser	In-Person	Employees cannot feasibly perform any work remotely. Employees in this department work on the manufacturing floor and must be on site where the product is manufactured.
Logistics/Material Handling	In-Person	Employees cannot feasibly perform any work remotely. Employees in this department support manufacturing by shipping and receiving materials and moving material throughout the facilities.
Maintenance	In-Person	Employees cannot feasibly perform any work remotely. Employees in this department work on the

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		manufacturing floor and must be on site where the product is manufactured.
Manufacturing Engineering	In-Person	Employees cannot feasibly perform any work remotely. Employees must be on-site to support the manufactured product.
Paint	In-Person	Employees cannot feasibly perform any work remotely. Employees in this department work on the manufacturing floor and must be on site where the product is manufactured.
Press Break	In-Person	Employees cannot feasibly perform any work remotely. Employees in this department work on the manufacturing floor and must be on site where the product is manufactured.
Project Management/Coordination	Remote In-Person as Needed	Employees can perform most work remotely. They will be needed on site when managing testing of prototypes or hosting customer meetings.
Purchasing	Remote In-Person as Needed	Employees can perform work remotely. On a periodic basis, they are required to physically check-in, inspect, validate supplies and supplier performance on-site.
Quality	In-Person	Employees cannot feasibly perform any work remotely. Employees must visually inspect parts on-site on the manufacturing floor, as well as perform audits on site (including supplier sites) as needed.
Sales	Remote In-Person as Needed	Employees can perform work remotely. On a case by case, sales will be required to meet on-site to resolve customer issues.
Scheduling	In-Person	Employees cannot feasibly perform any work remotely. Constant verbal communication is required between the scheduling team and operations to maintain our visual scheduling board.
Stamp	In-Person	Employees cannot feasibly perform any work remotely. Employees in this department work on the manufacturing floor and must be on site where the product is manufactured.
Supervision and Management	In-Person	Employees cannot feasibly perform any work remotely. Supervisors and managers must be on-site, on the manufacturing floor, to oversee the manufactured product and to be immediately available for any critical issues.
Tool Crib	In-Person	Employees cannot feasibly perform any work remotely. Employees must be on-site in the tool crib to provide items to employees on the manufacturing floor as needed.
Weld	In-Person	Employees cannot feasibly perform any work remotely. Employees in this department work on the manufacturing floor and must be on site where the product is manufactured.

NOTE: Team Leads are included with their department in the list above.