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DEPARTMENT OF INSURANCE AND FINANCIAL SERVICES
LANSING

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Memorandum

DATE: October 28, 2020

TO: Safe Start Advisory Working Group – Financial Institutions

FROM: David Merchant, Banking Specialist
Department of Insurance and Financial Services

SUBJECT: Safe Start Best Practices – Financial Institutions

October 28, 2020 Update:

On October 26, 2020, the Department of Insurance and Financial Services (DIFS) issued Bulletin [2020-42-BT/CF/CU](#), which requires regulated entities and individuals to comply with applicable provisions of the Michigan Department of Health and Human Services' [Emergency Orders](#), the Michigan Occupational Safety and Health Administration's (MIOSHA) [Emergency Rules](#), and any other applicable law, rule, or regulation related to the public health emergency caused by the COVID-19 pandemic or other emergency orders or rules issued or enacted at the federal, state, or local level.

The Bulletin further requires regulated entities and individuals to remain apprised of and in compliance with new or amended laws intended to address the public health emergency caused by the COVID-19 pandemic. Examples include, but are not limited to, Public Acts [236](#), [237](#), [238](#), and [239](#) of 2020.

On May 19, 2020, DIFS announced the creation of an advisory workgroup tasked with collecting input on best practices for financial institutions to safely re-open offices and for employees and the public to return to those offices.

Volunteers for the advisory group were solicited and more than 60 individuals representing banks, credit unions, debt management firms, mortgage companies and their respective trade associations participated.

The full advisory group met twice (May 26 and May 28). The group focused on mitigation of transmission risk in the workplace, including but not limited to, administrative controls, access control, social distancing, hygiene, sanitation, PPE, case

monitoring, and facility closure. Breakout sessions were held on May 27, with smaller groups meeting based upon comparable size and regional location.

The information contained within this memo is intended to represent a best practice consensus of those who participated. The information is advisory in nature and is not meant to be a substitute for legal advice. Each business should make its own determination about accepting or rejecting any or all elements of this memo. Businesses and employers are encouraged to coordinate with state and local health officials to obtain timely and accurate information to inform appropriate responses. Local conditions will influence the decisions that public health officials make regarding community-level strategies.

Administrative Controls

Create an exposure control plan:

- Document and share written exposure control plan to mitigate employee exposure.
- This plan should include an exposure risk determination for all employees, and detail measures the employer will take to prevent exposure, including:
 - Administrative controls, including access.
 - Engineering controls, including any steps taken to physically reconfigure the workspace and workflows.
 - Policies governing social distancing.
 - Policies governing personal hygiene.
 - Policies governing cleaning and disinfection.
 - Policies governing personal protective equipment.
- The exposure control plan should incorporate the latest guidance for COVID-19 from the Center for Disease Control and Prevention (CDC), and any additional requirements issued by federal, state, county, and municipal authorities, and local health officials.
- The exposure control plan may differentiate between workers commensurate with their exposure risk, with more stringent measures for higher risk categories.

Establish response owners:

- Team members with individual accountability should be identified, tasked with management and direct verification of implementation of all elements of the exposure control plan.
- Consider assigning one COVID-19 response manager for every individual branch.

- If feasible and depending on resources, consider dedicating staff to virus response (sole or primary responsibility).

Define the scope of the response team, including:

- Design, implement, and report out to management on workplace risk mitigation program.
- Create and complete a “health checklist” or daily symptom tracking survey.
- Establish points of contact and appropriate communications cadence with relevant state and local public health agencies.
- Work with the response team members to improve safety protocols and to ensure robust enforcement and reporting of workplace health / safety events.

Train employees:

- The curriculum of this training should:
 - Explain all elements of the exposure control plan, with specific guidance on access control, distancing, sanitation, hygiene, and use of personal protective equipment.
 - Include demonstration of proper use of personal protective equipment, including donning and doffing.
 - Explain worker’s rights and protections, including access to leave, and specify the steps that the employee can take if they feel unsafe in the workplace.
- Training should be jointly led by designated members of the COVID-19 response team.

Access Controls

Reduce congestion at start times and entry points:

- Employers should assign dedicated entry point(s) for all employees or groups to reduce congestion at main entrance, help with screening needs, and help with tracing.
- Employers should label queue spots with X’s outside building in case of congestion.

- If feasible, employers should consider staggering start times for locations to ensure social distancing and effectiveness of screening protocols (50/50 rotational schedules).
- If feasible, employers should create one-way flow corridors into the office, wherever possible.

Screen employee health / exposure:

- Employers should conduct daily entry self-screening protocol for all employees i.e., symptom tracking and exposure questionnaire.
- Employers may consider taking temperatures as a condition for daily entry.
- Workers should be barred entry if they have a fever (100.4°F based on temperature checks); or otherwise if the employee identifies coughing, or shortness of breath each day before leaving for work, before the shift, mid-shift, and at end of shift.

Control access for non-employees:

- Employers should implement procedures to identify customers/members upon entry.
- Employers should require that vendors and contractors schedule their visits ahead of time and attain explicit approval before arrival (e.g., conduct visitor questionnaire virtually and deny visitors who do not meet requirements).
- Employers should control site access (e.g., restrict visitors, contractors, deliveries – implement screening practices similar to employees), or in the alternative issue stickers or other indicators to workers to show that they received a screening before entering the office that day.

Consolidate entry points:

- Employer should put physical barriers (e.g., caution tape, plastic netting, gates) in place to prevent anyone from bypassing screening (if not possible, ensure there is some indication of employees having gone through screening –e.g., sticker).

Control access for non-employees:

- Employers should limit all non-essential visitors and contractors from the office site.
- Vendors and contractors should schedule their visits ahead of time and attain explicit approval before arrival (e.g., conduct visitor questionnaire virtually and deny visitors who do not meet requirements).

- Employers should control site access (e.g., restrict visitors, contractors, deliveries – implement screening practices similar to employees).

Social Distancing

Increase distance between people:

- Employers should establish officewide requirement for social distancing in accord with CDC guidelines (6 ft) [When 6 ft distancing is not feasible, workers are at higher risk; see PPE section for additional guidance].

Limit use of common spaces:

- Employers should identify (with signage) and consider closure / occupancy limits for common choke points where workers are forced to stand together, such as hallways, hoists and elevators, break/lunch areas, buses (see “provide reinforcements” section for details).
- Employer should require physical distancing in lunch and break areas and provide physical markers (e.g., tape on the ground to assist).
- If feasible close break/lunch areas if possible and encourage employees to eliminate eating in groups (eat in personal vehicles).

Stagger shifts and timing to reduce congestion:

- Employers should consider staging / staggering crews and modifying work schedules to limit number of workers in the office.
- Employers should consider Stagger start times and meal times (e.g., by 15 mins).
- Employers should minimize interactions when picking up or delivering equipment or materials (e.g., PPE, surface disinfection).

Provide visual cue to reinforce distancing expectations:

- Employers should employ visual cues to enforce distancing wherever possible (e.g., tape, ground markings, walking traffic patterns marked, physical barriers, elevator guidelines, signs with social distancing requirements).
- Employers should post signage and train people not to congregate at break areas, lunch areas, etc.

Sanitation

Conduct more frequent cleaning:

- Employers should fully disinfect office areas and common surfaces regularly.
- Employers should identify responsible party for cleaning / sanitation (e.g., one person/shift or every worker or external), and clearly communicate this to employees.
- Employers should frequently clean and disinfect high touch surfaces in the office.
 - “High touch surfaces” will include shared equipment, handrails, doorknobs, etc. frequently, per CDC guidelines; for shared items wipe with disinfectant before being transferred.
 - Employers should more frequently clean toilets and restrooms.
- If feasible, employers should ensure optimal turnover of fresh/clean air on site if enclosed (e.g. bay and other doors/windows opened where feasible).

Provide cleaning materials and establish protocols:

- Employers should provide disinfecting materials, EPA-approved for emerging viral pathogens.
- Employers should create policies governing cleaning shared items and require disinfection at the beginning and end of individual usage.
- Employers should provide time for employees to clean at the start and end of shifts.

Hygiene

Provide handwashing / sanitation options:

- Employers should provide soap and running water wherever possible to permit frequent handwashing.
- Alcohol-based sanitizers (greater than 60% ethanol or 70% isopropanol) should be provided as a backup, only if providing supply of running water is impossible.
- Employers should provide individual hand sanitizer bottles to workers, and position extra hand sanitizer in areas next to shared equipment, and materials.
- Employers should develop policies specifying that handwashing is required for all workers at the start of the shift, breaks, bathroom trips, lunch, team huddles, at the

end of the shift, and after any close contact with someone displaying cough or cold symptoms.

- Employers should post signage for hygiene (wash hands, cover cough, don't touch face).

PPE

Enforce PPE use:

- Employers should analyze and understand requirements (consistent with guidance and requirements issued by: Federal, state, county / municipal authorities, employers, health officials).
- Employers should require that facial coverings be worn by all employees who cannot consistently maintain 6 ft of separation from other employees (provided by employer), as appropriate and dictated by activity.
- Employers should require that employees use facial coverings before employees approach the facility entrance check point.

Distribute PPE:

- Employers should consider establishing a mask pick-up location on site for those who need replacement.

Ensure stocking:

- Employers should confirm stock of facial coverings, face shields, gloves, and glasses on site and on order with lead time.
- Employers should confirm that the operation has an adequate supply of additional health supplies (e.g., soap, disinfectant, hand sanitizer, paper towels and tissues).
- Employers should target no more than 30-day stock of critical supplies (e.g., sanitizer, masks) on site or on order with sufficient lead time and avoid stockpiling.

Provide guidance on PPE:

- Employers should communicate guidance on PPE use while in the office, which may vary by employee.

- Employers should train employees on the use of PPE (including storage, doffing and re-donning facial covering), in addition to the protective triad of personal hygiene, social distancing and frequent disinfection.
- Employers should permit voluntary individual use of masks in excess of guidelines.
- In case of any conflict between any of foregoing guidance, the strictest measure should apply.

Case Monitoring

Define protocols for symptomatic employees:

- Employers should ensure that employees with symptoms (based on self-assessment, screening etc.) are sent home.
- Employers should instruct that sick employees stay home in accordance with most recent Executive Orders.
- Employers should ensure protocols are visible in the facility (e.g., post signage to stay at home if specified symptoms occur).
- Employers should ensure isolation protocol and areas established to isolate symptomatic employees prior to sending to medical care or home to self-quarantine.
- Employers may also provide guidance where appropriate and support for employees (e.g. virtual training, etc.).
- Employers should check in periodically with employee on symptoms and work ability.
- Employer should report confirmed cases and outbreaks to state and local public health authorities, including any relevant information on circumstances of transmission and contacts of the infected worker.

Provide guidance to exposed employees:

- Employers should follow CDC response guidelines for exposure cases.
- Employers should inform team members and relevant managers of their potential exposure when employee is sent home.

- Employers should enact policies to encourage workers to stay home / leave the office (e.g., temp paid sick leave) when feeling sick, or after close contact with a confirmed positive case.
- Employers should trace close contacts of the infected worker within the workplace, for 3-7 days prior to onset of symptoms (based on where employee was and whether PPE was worn).
- Communicate procedures with employees.

Mark off and clean spaces identified in workplace tracing:

- Employer should clean appropriate areas based on tracing procedures and CDC recommendations whenever a person has been sent home for symptoms.
- Employer should perform a site area deep cleaning/disinfection (e.g., misting) as well as physical disinfection of common tools and surfaces whenever a COVID-19 person has been confirmed at the site.
- If feasible, employer should consider leveraging a third-party cleaning service.

Facility Closure

Enforce appropriate shutdown / cleaning protocols:

- Employers should establish specific response plan for confirmed cases (e.g., investigate, formulate response and cleaning procedures); if a worker goes home from the office with symptoms disinfect the area, supplies, and tools that person worked with immediately.
- Employers should shut down appropriate locations at the office down for deep cleaning (enforce appropriate amount of shutdown time) if there was a confirmed positive case.

Communicate exposure to employees:

- Employers should conduct workplace contact tracing investigation for confirmed cases and notify those contacted or suspected of being in contact (e.g., notify contractual upstream entity: if subcontractor, notify Contractor; if Contractor, notify Owner).
- Employers should ensure appropriate documentation of positive cases for necessary parties (health services, health insurance), and record confirmed cases.

- Employers should ensure employees who were potentially exposed to a positive case to monitor symptoms closely and stay home if there was a high risk of exposure or symptoms occur (while maintaining employee privacy).