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STATE OF MICHIGAN
DEPARTMENT OF INSURANCE AND FINANCIAL SERVICES
LANSING

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Memorandum

DATE: October 28, 2020

TO: Safe Start Advisory Working Group – Insurance Agencies

FROM: Chad Arnold, Director, Office of Innovation and Research
Michigan Department of Insurance and Financial Services

SUBJECT: Safe Start Best Practices – Insurance Agencies

October 28, 2020 Update:

On October 26, 2020 the Department of Insurance and Financial Services (DIFS) issued Bulletin 2020-43-INS, 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 insurance agencies to safely re-engage in the economy.

Volunteers for the advisory group were solicited and 14 individuals representing large and small insurance agencies across the state participated. Additionally, the Michigan Association of Insurance Agents (MAIA) and the Michigan Association of Professional Insurance Agents (MIPIA) participated and provided input on behalf of many additional insurance agencies.

The advisory group met three times (May 26, May 27, and May 28). The group focused on mitigation of transmission risk in the workplace, including but not limited to,

administrative controls, access controls, social distancing, hygiene, sanitation, PPE, case monitoring, and facility closures.

The information contained within this memo is intended to represent a consensus of those that 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.

- Develop a plan in the event of COVID-19 exposure that is specific to your workplace. This could include but is not limited to, procedures for communicating with employees, clients, or outside vendors regarding possible exposure, identifying potential exposures, and control measures to eliminate or reduce exposures.

Establish a response team.

- Designate a team or an individual who will be responsible for COVID-19 issues and their impact at the workplace. Define the scope of duties for the response team.

Train employees.

- Make sure employees understand your exposure plans. Talk with your employees about planned changes and seek their input. Communicate with employees individually to assess their individual needs and comfort level regarding an exposure plan.

Access Control

Reduce congestion at start times and entry points.

- Consider staggering shifts so fewer people are entering the building at the same time or posting signs and other visual cues that help people maintain 6 feet apart near entry points.

Screen employee health and exposure.

- Consider having employees complete a daily self-assessment screening checklist before reporting to work. Self-assessment questions could include, but may not be limited to, asking the employee if they have been exposed to COVID-19, if the employee feels sick, or if they have traveled recently.

- Consider conducting daily in-person or virtual health checks (e.g., symptom and/or temperature screening) of employees before they enter the facility, in accordance with state and local public health authorities.

- Monitor federal, state, and local public health communications about COVID-19 screening protocols, guidance, and recommendations and ensure that workers have access to that information.

Actively encourage sick employees to stay home.

- Employees who have symptoms should notify their supervisor and stay home.

- Employees should not return to work until the criteria to discontinue home isolation are met, in consultation with healthcare providers and guidance from local public health authorities.

- Employees who are well but who have a sick family member at home with COVID-19 should notify their supervisor and follow CDC recommended precautions.

Control site access.

- Communicate to contractors, customers, clients, or any on-site visitors about changes that have been made to help control the spread of COVID-19. Ensure that they have the information and capability to comply with those policies.
- Consider posting signs on entry points to communicate with outside visitors of your workplace policies before they enter the building.

- Consider scheduling staggered in-person appointments with outside vendors or clients to minimize the amount of people in the workplace at a time.

Consolidate entry points.

- Control entry points for employees and outside visitors. Consider designating certain entry points for specific people and consider monitoring people moving through entry points.

Restrict travel and modify transportation policies.

- Minimize non-essential travel and consider resuming non-essential travel in accordance with state and local regulations and guidance.

- Employees who have engaged in considerable outside travel should consider adhering to self-isolation guidelines before returning to the workplace.

Social Distancing

Increase distance between people.

- Increase physical space between employees at the worksite by modifying the workspace.

- Increase physical space between employees and customers. Consider using physical barriers such as partitions. Use signs, tape marks, or other visual cues such as decals or colored tape on the floor, placed 6 feet apart, to indicate where to stand when physical barriers are not possible.

- Adjust your business practices to reduce close contact with customers. Consider utilizing email, phone calls, or video calls to communicate with customers and minimize in-person appointments.

- If in-person appointments are necessary, consider establishing social distancing protocols for in-person appointments. Consider creating a designated space for appointments, maintaining 6 feet apart during appointments, and minimizing or staggering the time of appointments with customers to reduce exposure risks.

Limit use of common spaces and "choke" areas.

- Close or limit access to common areas where employees are likely to congregate and interact. This could include meeting spaces, kitchen areas, or break areas.

Stagger shifts.

- Implement flexible worksites (e.g., telework).

- Implement flexible work hours (e.g., rotate or stagger shifts to limit the number of employees in the workplace at the same time).

- Consider what is appropriate for individual employees. Some employees may work better at the business location and some employees may work better at home.

Provide visual cues.

- Use signs, tape marks, or other visual cues such as decals or colored tape on the floor, placed 6 feet apart, to indicate where to stand when physical barriers are not possible.

Hygiene

Provide handwashing stations.

- Consider social distancing measures at hand washing stations and restrooms to minimize exposure.

Provide hand sanitization options.

Create personal hygiene policies.

- Place posters that encourage hand hygiene to help stop the spread at the entrance to your workplace and in other workplace areas where they are likely to be seen.

Sanitation

Conduct more frequent cleaning.

- Routinely clean all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, and doorknobs.

Provide cleaning materials.

- Provide disposable disinfecting wipes so that employees can wipe down commonly used surfaces before each use.

Establish protocols for sanitation of shared equipment.

- Discourage workers from using each other's phones, desks, offices, or other work tools and equipment, when possible.

- Consider requiring employees to clean shared equipment after individual use. Train employees on the expectations of cleaning shared spaces. Leadership should lead by example.

PPE

Enforce use of facial coverings.

- Consider using masks in common areas or in interactions where social distancing is not possible.

Distribute facial coverings and PPE.

- Consider distributing adequate masks and PPE to employees that are in workspaces where adequate social distancing may not be achievable.

- Give employees, customers, and visitors what they need to clean their hands and cover their coughs and sneezes.

Ensure PPE is appropriately stocked, and employees and visitors have access to PPE.

Provide adequate guidance and training to staff on the use of PPE.

Case Monitoring

Define positive case protocols for isolation and workplace contact tracing.

- Businesses and employers are encouraged to coordinate with state and local health officials to obtain timely and accurate information to inform appropriate responses for case monitoring. Local conditions will influence the decisions that public health officials make regarding community-level strategies.

Provide guidance to exposed employees.

- Inform employees of their possible exposure to COVID-19 in the workplace but maintain employee confidentiality.

Mark off and clean spaces identified in workplace contact tracing.

Facility Closure

Enforce appropriate shutdown / cleaning protocols.

- Have a plan in place in the event your business facility must close. Businesses and employers are encouraged to coordinate with state and local health officials to obtain timely and accurate information to inform appropriate facility closure responses. Local conditions will influence the decisions that public health officials make regarding community-level strategies.

Communicate exposure to employees.

- Inform employees of their possible exposure to COVID-19 in the workplace but maintain employee confidentiality.

Technology

Consider investing in technology infrastructure and equipment to allow your business to operate remotely and train employees on adequate use of technology (e.g. video calling, cyber security, virtual private networks).

Consider communicating use of technology to customers and outside vendors. Some customers may require additional assistance in understanding technology policies.

Organizational Resources

Consider reaching out to appropriate federal, state, or local government agencies for guidance or assistance.

Consider reaching out to other trade organizations such as state or local business chambers, the MAIA, MIPIA, or other national trade associations for additional business resources and expertise.