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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

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

SUBJECT: Safe Start Best Practices – Insurance Companies

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 companies to safely re-open offices and for employees and the public to return to those office.

Volunteers for the advisory group were solicited and 18 individuals representing life, health, and property and casualty insurance carriers across the state participated. Participants are members of larger trade associations including the Insurance Alliance of Michigan (IAM), the Michigan Association of Health Plans (MAHP), and the Life Insurance Association of Michigan (LIAM).

The advisory group met twice (May 26, and May 27). 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.

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.

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 screening employees for exposure or having employees complete a daily self-assessment screening. Screening 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 employees, 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 utilizing security cameras or electronic badge access to monitor and control site access within the business location.

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 business travel and other non-essential travel and consider resuming non-essential travel in accordance with state and local regulations and guidance.
- Employees who have engaged in personal travel should adhere 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. Consider modifying shared desks to individualized desk spaces for employees.
- Increase physical space between employees. 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 between employees and with outside contractors, customers, clients, or any on-site visitors.
- Consider utilizing email, phone calls, or video calls to communicate with and minimize in-person appointments.
- For business functions where maintaining adequate social distancing is not possible, such as mail room functions, consider adjusting processes or utilizing other strategies to reduce risk of exposure as much as possible. This could include shift rotations or additional PPE.

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, cafeterias, kitchen areas, gyms, elevators, or break areas.
- Limit the maximum number of people that may simultaneously use elevators and provide signage outside elevators to help maintain social distancing.

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 maintaining a lower percentage of employees at office locations or having a certain percentage of employees return to the workplace at a time.
- Consider what is appropriate for individual employees. Consider voluntary return policies so the employee can choose the work environment that works best for them.

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.
- Consider having employees routinely clean their workspaces at the beginning and end of each workday. Consider maintaining clear desk policies to make frequent cleaning of workspaces easier.
- Custodial services can provide a deep clean between employee workday shifts.

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 utilizing signs to indicate the frequency certain equipment or spaces should be cleaned.

PPE

Enforce use of facial coverings.

- Consider using masks in common areas or in spaces where social distancing is not possible such as mail rooms.

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. Providing additional gloves or protective coats to employees may be appropriate in these conditions.
- 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.

- When employees report suspected exposure, assess what other employees were in contact with the exposed employee.
- Review benefit and compensation policies for employees that are subject to a mandated quarantine. Also consider providing other resources for employees such as mental health services.
- 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 should 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).