

As of 5/16/2020 at 12am



MICHIGAN DEPARTMENT OF
**LABOR & ECONOMIC
OPPORTUNITY**

As of 5/16/2020 at 12am

Department of Labor and Economic Opportunity
Employer guidance on best practices: Laboratory Research

PRELIMINARY AND PRE-DECISIONAL | MAY 15TH, 2020



Eight steps for employers to keep their workers safe, within the hierarchy of controls



1 Administrative controls



2 Access control



3 Distancing



4 Sanitation



5 Hygiene



6 PPE



7 Positive case protocols



8 Facility closure

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 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
 - Policies governing
- The exposure control plan should incorporate the latest guidance for COVID-19 from the Center for Disease Control and Prevention (CDC), and any federal requirements issued by: federal, state, county, and municipal authorities; employers; and project owners
- The exposure control plan may differentiate between workers commensurate with their exposure risk, with more stringent measures for higher risk categories



1

Administrative controls

Establish response owners

- A central point of contact should be identified for implementation of the exposure control plan
At minimum, one COVID-19 response manager should be identified for every facility
- If feasible and depending on size of worksite, 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 labor union and state and local public health agencies
- If feasible, leverage a digital tool or dashboard to track implementation of protocols and opportunities to tighten or improve



1

Administrative controls



1

Administrative controls

Train employees

- Employers should develop training materials and schedule training time with all employees prior to return to work
- Employers should conduct this training module at all facilities / on all jobsites, before resumption of work, and consider sharing guidelines with workers in advance of return
- 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; this includes informing vulnerable workers of their ability to draw down UI benefits instead of returning to work
 - “Translate” guidance to applicable situations encountered during everyday work
- Training should be jointly led by the ranking manager on the jobsite, a labor union representative, and designated members of the COVID-19 response team
- Subsequent training may be necessary to update employees on evolving guidance / policy
- Employers should conduct periodic Q&A with team members to answer questions

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)

Screen employee health / exposure:

- Employers should conduct daily entry self-screening protocol for all employees i.e., symptom tracking and exposure questionnaire, with HR team prepared to receive and respond to alerts
- Employers should screen worker temperatures as a condition for daily site 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
- Employers should ensure physical barriers are in place to prevent anyone from bypassing health screenings and entering the facility
- If feasible, and more likely long term, on-site partnerships with state and local healthcare to facilitate rapid diagnostic testing should be considered



2 Access control

Control site access for non-employees

- Employers should bar all non-essential visitors and contractors from the worksite
- Employers should require that essential visitors 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)
- Create non-contact delivery protocols



2 Access control

Restrict business and personal travel

- Employers should only permit business critical travel
- Employers should reduce risk from contractors by restricting unnecessary movement between project sites and establishing minimal handoff deliveries
- Employers should require 14-day quarantine after returning from any necessary personal travel (confirm with site leader upon return)

If possible, modify transportation practices

- If transportation is employer owned / managed, employer should consider utilizing assigned seating to simplify contact tracing should an employee be diagnosed as COVID-19 positive
- Employers should work with transportation provider(s) to review health screening (reducing shift changeover time) and disinfection protocols for seats and other common surfaces



2 Access control



2 Access control

Questions:

Enter the team member EmplID (If KBS, Paramount or Serv U, enter name) * Required Response

Do you have any new and unusual of the following symptoms: fever greater than 100.4 degrees F, cough, difficulty breathing or shortness of breath, diarrhea, chills or sore throat? * Required Response

- Yes
- No

If a touchless thermometer has been provided to your store, confirm the team member's temperature below.

Select N/A if no thermometer has been provided * Required Response

- Yes (Temperature is > 100.4° F)
- No (Temperature is <= 100.4° F)
- N/A

Have you had or have you been notified that you have had close contact with a person that has been diagnosed with COVID-19 through a positive test result? * Required Response (does not apply to Pharmacists or Pharmacy Techs)

- Yes
- No

Have you travelled internationally or domestically (i.e. air travel or cruise) within the last 14 days?

* Required Response (does not apply to Pharmacists or Pharmacy Techs)

- Yes
- No

If "Yes" was answered to any questions above:

- The team member is not permitted to work that day
- The team member must contact ILM at 1-800-854-7062
- The team leader must enter 2 hours of pay for the team member

Illustrative

Increase distance between people

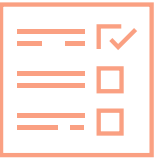
- Employers should restrict capacity of labs to 1-2 people or 1 person per 144 square feet, and post relevant signage in individual lab spaces
- Employers should facilitate separate working hours or separate policy for vulnerable populations, or those who share a home with a high-risk individual
- Employers should eliminate occasion for interactions with visitors or the general public
- Employers should prohibit handshake and other high-risk behaviors
- Employers should issue policies ensuring that office and dry lab research remain remote

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, cafeterias
- Employers should limit capacity in dense rooms (e.g., consider closing off every other urinal in restrooms)
- Employers should consider turning off shared water fountains, ice makers, restroom hand dryers, and other highly tactile equipment



3 Social distancing



3 Social distancing

Stagger shifts and timing to reduce congestion

- Employers should consider implementing rotational shift schedules (e.g., increasing number of shifts, alternating days of the week) to reduce headcount in facility at any given time
- Employers should consider staggering start times and mealtimes (e.g., by 15 mins)
- Employers should consider limiting stairwells and entry points to one-way flow of traffic, demarcated with signage / visual cues and reinforced by training

Provide visual cues 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
- Employers should consider closing off seats (or removing) to ensure appropriate distancing

Create physical separation barriers

- Wherever possible, employers should install temporary barriers in areas where workers congregate in normal course of business (e.g., between workstations on an assembly line)

Provide handwashing / sanitation options

- Employers should provide soap and running water wherever possible on job sites to permit frequent handwashing
- Alcohol-based sanitizers (greater than 60% ethanol or 70% isopropanol) should be provided as a backup, only in the event that 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 tools, 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)



4 Hygiene

Conduct more frequent cleaning

- Employers should fully disinfect workstations and high-touch surfaces prior to site reopen
- Employers should identify responsible party for cleaning / sanitation by project site (e.g., one person/shift or every worker), and clearly communicate this to employees
- Employers should frequently clean and disinfect high touch surfaces on job sites
 - “High touch surfaces” will include shared tools, equipment, handrails, doorknobs, etc. frequently, per CDC guidelines; for shared items like tools, wipe with disinfectant before being transferred
 - Employers should consider shutting down use of high-touch items that are not essential (e.g., hand dryers or ice machines) if frequent enough disinfection is impractical
- Employers should consider locally ventilating high-density areas, installing high-efficiency filters, and increasing percentage of outside air in HVAC system



5 Sanitation

Provide cleaning materials and establish protocols

- Employers should encourage employees to clean personal items prior to entry (e.g., personal cellular phones)
- Employers should provide disinfecting materials, EPA-approved for emerging viral pathogens
- Employers should designate a cleaning protocol for all areas and post specifically and visibly, e.g., 2-6x per day (depends on high-touch frequency)
- Employers should implement clean-desk policies and procedures to be executed at the end of each day
- Implement a compliance procedure to ensure that cleaning criteria remain consistent
- Monitor lab cleanliness with checklist from virus response team
- Employers should close the facility long enough to allow for intensive overnight cleaning
- Employers should communicate expectations of third-party janitorial contractors and independently verify that they are exercising proper protocols



5 Sanitation

Illustrative

Conduct more frequent daily cleaning of all high touch areas and post protocols publicly

Establish employee cleaning protocols

Elevate daily cleaning and deep cleaning by 3rd parties

Conduct routine checks for cleaning procedures



5 Sanitation

2. Cleaning

- Implement a mildly enhanced cleaning service, substitute cleaning solutions to better attack virus (with bleach or other ingredients that state EPA approved emerging viral pathogens or Clorox 360 machines), focus attention on communal, public and highly trafficked areas and increase frequency of cleaning to the following minimum standards.

3. Restrooms:

- Counter tops, sinks, faucets, toilets, urinals, stalls, doors. Light switches, soap dispensers, sanitary dispensers
- Recommended frequency – 1x daily

4. Break Areas:

- Tabletops, chairs, benches, trash receptacles, buffet lines, registration stations, doors, vending machine stations, refrigerators, handles, doors, light switches, napkin holders
- Recommended frequency – 1x daily

5. Common areas:

- Concierge stations, elevators, stairs coffee machines, phones, light switches, doors,
- Recommended frequency – 1x per day

6. Conference rooms:

- Table tops, chairs, phones, white boards and utensils, light switches, doors
- Depending upon the face to face guideline recommendation, conference room use may be at a minimum. Recommended – 1x per day

7. Offices:

- Table tops, chairs, key boards, phones, light switches, doors
- Recommended frequency – 1x per day

Workspace Hygiene

Janitorial services at DTE does not include cleaning of individual workstations. Individual users are responsible for cleaning the workstations that they use. These simple solutions can assist in keeping your area clean.

PRACTICE GOOD PERSONAL HYGIENE

- wash hands often with soap and water. If not available, use hand sanitizer
- avoid touching your eyes, nose, or mouth with unwashed hands
- avoid contact with people who are sick
- stay home while you are sick and avoid close contact with others
- cover your mouth/nose with a tissue or sleeve when coughing or sneezing

Keyboards. Wet a paper towel with water and a small dab of soap and lightly clean any dirty areas. They are safe to be wiped down with a sanitizer wipe.

Computer mouse. They are safe to be wiped down with a sanitizer wipe.

Computer monitor. LCD or LED screens require special cleaning procedures. It is important to remember not to spray any liquids onto the screen directly. Cleaning solution should be applied to a soft cotton or microfiber cloth and then gently wipe the screen. Rubbing alcohol on a microfiber cloth works well.

Phones and headsets. Avoid sharing phones and headsets. These items can all be cleaned with sanitizer wipes. Cell phones should be cleaned as well.

Staplers and tape dispensers. Be certain to use sanitizer wipes to clean all surface areas of the stapler and tape dispensers, top, bottom, and sides. These items are often picked up, and more than just the top should be cleaned.

Penkits and pens. These tools are best cleaned by wiping them down with sanitizer wipes individually since they are held and pass through many hands.

Chairs. Chairs should be wiped down with antibacterial wipes.

Desktop. The final step of a clean workspace is a disinfected desk. Once you've cleaned the other items on your desk, you're ready for the finishing touch. Use disinfectant wipes to thoroughly clean the entire surface. Do not ignore spaces that aren't easily accessible. For instance, lift photo frames to wipe underneath them.

Common work areas. Don't forget to disinfect common work areas as well. Areas like printers and equipment in copy rooms carry the same risk of germs as do the items in an individual work area.

Kitchen spaces. When using kitchen areas, be sure to wipe down with sanitizer wipes after use. Don't use aerosol in these areas, as the chemicals may contaminate food and beverage containers.

Touch Point	Enhanced Frequency			
	Process Owner			
	Day Porters	Facilities (Daily)	Janitorial	Tot
RESTROOMS				
Restroom Sinks/Handles	3x	N/A	1x	4x
Restroom Vanities/Countertops	3x	N/A	1x	4x
Stall Doors	3x	N/A	1x	4x
Entrance Door Handles	3x	N/A	1x	4x
Toilet Handles/Buttons	3x	N/A	1x	4x
TP Dispensers	3x	N/A	1x	4x
Soap Dispensers	3x	N/A	1x	4x
Feminine Waste Receptacles	3x	N/A	1x	4x
KITCHENS				
Kitchen Sinks/Handles	3x	N/A	1x	4x
Kitchen Countertops	3x	2x	1x	6x
Microwave Door Handles	3x	2x	1x	6x
Refrigerator Door Handles	3x	2x	1x	6x
Vending Machine Key Pads	3x	2x	1x	6x
Toasters	N/A	2x	N/A	2x
Dishwasher Doors	3x	N/A	1x	4x
Cabinet Handles/Knobs	3x	2x	1x	6x

Layered Audit Checklist

tasks: Implement Audit

Conforming Audit Card

Shift: _____

Inspection Area: _____

General Disinfection Measures

- Did the cleaning crew / employees review / retrain about the disinfection method and frequency?
- Was hospital grade disinfectant or bleach (10% chlorine bleach solution bottom dependent on dilution used as appropriate)?
- Did the team conduct a comprehensive cleaning in all work and common surfaces (control buttons, touch conveyors, trays, containers, forks/knives, machines)?
- Did the team conduct a comprehensive cleaning in all offices, desk and conference rooms (cabinets, desk, table and their surface)?
- Did the team conduct a comprehensive cleaning in all general objects of use (used or touched) (stairs, railings, handles, faucets, walls, keyboards)?
- Did the team conduct a comprehensive cleaning in cafeteria/lounge (tables, chair surfaces, dispensers, vending machines, etc.)?
- Did the team conduct a comprehensive cleaning in all common surfaces of personal buses (hand surfaces, walls, belts, door, windows, floor)?
- Did the team conduct a comprehensive cleaning in floors, walls and multiuse areas (tables, chair surfaces, dispensers, vending machines, etc.)?

2nd Layer Audit: Audit of the above performed by a higher-level manager

9. Were non conformities raised? Y/N

10. If yes, were they actioned?

11. If no, please provide reason:

3rd Layer Audit: Audit of Layer 2 by 3rd or a higher-level manager

13. Were all non conformities closed? Y/N

14. If no, please provide reason:



Enforce PPE use

- Employers should analyze and understand requirements (consistent with guidance and requirements issued by: Federal, state, county / municipal authorities, employers, owners)
- Employers should ensure that team members have access to facial coverings (surgical masks or cloth masks made to public health specifications)
- Employers should consider procuring thermometers, facial coverings, and sanitizer
- Employers should consider face shields for all employees who cannot consistently maintain 6 feet of separation from other employees
- Employers should require that employees use facial coverings before employees approach the facility entrance check point

Distribute PPE

- Employers should distribute necessary PPE at morning check-in or at building entry
- As appropriate, employers should disinfect / wash facial coverings / masks overnight
- Employers should record and track who has received their masks (e.g., weekly allotment for employees)



Ensure stocking

- Employers should confirm stock of facial coverings, face shields, gloves, and glasses on site and on order with lead time
- Employers should ensure that the site has the ability to collect temperature readings, i.e., by procuring non-contact infrared thermometers or thermal cameras for building entry
- 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 provide guidance on PPE use on the worksite (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 hygiene, distancing, disinfection
- Employers should permit voluntary individual use of masks in excess of guidelines
- Employers should coordinate procedures with suppliers and contractors that may be onsite in normal course of operations, to ensure that protocols align
- In case of any conflict between any of foregoing guidance, the strictest measure should apply



Illustrative

Ensure PPE (facial coverings, hand sanitizer) is stocked

Cloth mask



Surgical mask



Provide guidance for PPE usage and reasoning

Coronavirus ("COVID-19") Preparedness: Critical Onsite Team Member Guidelines

The health and wellbeing of our team members remains of utmost importance to us. We continue to monitor evolving CDC guidelines and state directives on best practices to maintain a healthy work environment. Below are our updated guidelines for our critical onsite team members, effective immediately until further notice.

HAND WASHING; COUGHS AND SNEEZES:

You can help minimize the spread of COVID-19 by practicing good hygiene etiquette.

1. Wash your hands often with soap and water for at least 20 seconds (sing "happy birthday" twice) especially after you have been in a public place, or after blowing your nose, coughing, or sneezing. A helpful guide on proper hand washing can be viewed here: <https://www.youtube.com/watch?v=d214EnU4Fo&feature=youtu.be>
2. If soap and water are not readily available, use a hand sanitizer that contains at least 60% alcohol. Cover all surfaces of your hands and rub them together until they feel dry. Hand sanitizer can be found in common areas on the floor such as the kitchen.
3. Avoid touching your eyes, nose, and mouth with unwashed hands.
4. Remember to always cover your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow. A helpful guide can be viewed here: <https://www.youtube.com/watch?v=vesl8Xv2l0g>
5. Throw used tissues in the trash.

MASKS AND GLOVES:

1. We are requiring all team members to wear a mask that covers your nose and mouth or other face covering (scarf, bandana) while you are in the office.
2. You will be supplied with a mask to wear during your workday. If you need a face mask, reach out to your team leader to get one for you.
3. You can supply your own mask if it is in line with the CDC's guidelines. Here are some helpful tools on how to make your own mask if you wish:
 - a. <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/diy-cloth-face-coverings.html>
 - b. <https://www.youtube.com/watch?v=iPx1yqv0t4&feature=youtu.be>

<https://www.cdc.gov/handwashing/when-how-handwashing.html>



6 PPE

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 should identify and train Isolation Coordinator(s) for on-site assistance
- 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



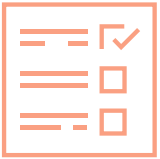
7 Case monitoring

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 worksite (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). See details on how to qualify “contact” on following page
- 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



7 Case monitoring

Enforce appropriate shutdown / cleaning protocols

- Employers should establish site specific response plan for confirmed cases (e.g., investigate, formulate response and cleaning procedures); if a worker goes home from the site with symptoms disinfect the area, supplies, and tools that person worked with immediately.
- Employers should shut down appropriate locations on the site 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
- Employers should ensure appropriate documentation of positive cases for necessary parties (labor union, health services, health insurance), and record confirmed cases
- Employers should ensure employees who were potentially exposed to a positive case on site to monitor symptoms closely and stay home if there was a high risk of exposure or symptoms occur (while maintaining employee privacy)



8 Facility closure