



COVID-19 RETURN TO WORK PLAN

For Public Facing Workspaces/Customers

This document may be revised or amended to reflect changes in directives and introduce new pertinent information or recommended practices.

February 2021

General

The Michigan State Housing Development Authority (MSHDA) is committed to providing a safe and healthy workplace for all employees, vendors, and customers. As part of this effort, we have developed the following COVID-19 Return to Work Plan for public customers. Our goal is to mitigate the potential for transmission of COVID-19 in our workplace and communities.

This plan has been established in accordance with the Governor's latest [Executive Directives](#), [MIOSHA Emergency Rules](#), [DHHS Epidemic Orders](#), and [CDC guidance](#). This plan was developed to meet the expectations for the Michigan Department of Labor and Economic Opportunity (LEO) agencies. Please refer to [LEO's Return to Work Framework](#) for additional details.

The Emergency Rules have general safeguards applicable for all workplaces and specific safeguards for certain industries. MSHDA's Return to Work Task Force has read these emergency rules carefully, developed the safeguards appropriate to MSHDA based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan. MSHDA's Return to Work Task Force will implement, monitor, and report on the COVID-19 control strategies developed in this plan.

This plan will be made available on MSHDA's public website and upon request. Questions about the plan should be directed to MSHDA's Human Resources Director at [MSHDA-Human-Resources-General](#) or call (517) 241-6281.

Roles and Responsibilities

In accordance with the State of Michigan's Safely Returning Employees to the Workplace, MSHDA has established the MSHDA Safe Start Team, the Return to Work Task Force, and the Business Recovery/Quality Assurance Team. These teams will be responsible for establishing and implementing return to workplace goals, periodically reviewing the COVID-19 Return to Work Plan and identifying lessons learned, best practices, and improvement needs stemming from agency communications, engineering and administrative work practice controls, and personal protective equipment used during the pandemic.

MSHDA's Safe Start Team is comprised of the agency's executive committee members who are involved in the Authority's overall strategic direction. The Safe Start Team identifies and prioritizes MSHDA's services and programs that will return to the workplace first with consideration to the agency's physical and business operations.

MSHDA Safe Start Team Members

- Gary Heidel, Executive Director
- Jeff Sykes, Chief Financial Officer

- Kelly Rose, Chief Housing Solutions Officer/Chief Housing Investment Officer
- Clarence Stone, Director of Legal Affairs
- Chad Benson, Director of Development
- Troy Thelen, Director of Asset Management
- Mary Townley, Director of Homeownership
- Katie Bach, Communications Director
- Tiffany King, Equity and Inclusion Officer
- Tonya Young, Housing Initiatives NE Team Manager
- Daphne Wells, Director of Operations

MSHDA's Return to Work Task Force (RTF) works collaboratively to implement return protocols. The team is comprised of the agency's Operations management team and other employees assigned this special role. MSHDA's RTF will engage subject matter experts and management representatives as appropriate to develop and initiate the risk management controls in this plan. Chris Hudson, Facilities Management, is designated as MSHDA's Safety Coordinator.

MSHDA Return to Work Task Force (RTF) Members

- Chris Hudson, Facilities Management & Safety Coordinator
- Mary Cook, Director of Office Services
- Lori Fedewa, Human Resources Director
- Mark Whitaker, IT Director
- Sara Driver, Rental Assistance & Homeless Solutions
- Fred Durhal, Community Outreach
- Sherry Hicks, Departmental Manager (Cadillac Place Liaison)
- Burney Johnson, Deputy Director SE Michigan Office (Cadillac Place Liaison)
- Katy Twining, Hardest Hit Operations Manager
- Mary Townley, Director of Homeownership
- Daphne Wells, Director of Operations

The **Business Recovery/Quality Assurance Team** shall be comprised of the Return to Work Task Force members. Other MSHDA employees may be assigned to special roles. The Quality Assurance Team will periodically review MSHDA's COVID Return to Work Plan to identify lessons learned and improvements. This information will be forwarded to MSHDA's executive director to enhance the agency's Continuity of Operations Plan (COOP). The information may also be shared with the Office of the State Employer (OSE) upon request.

Priority Services to Return to the Workplace

MSHDA does not plan to transition its employees back to the office in the immediate future and this plan may be further expanded and developed in collaboration with staff and building management. The purpose of this program is to minimize or eliminate employee, vendor, and customer exposure to COVID-19.

MSHDA's Safe Start Team will identify critical services to open to the public as soon as appropriate and develop a strategy to return services and employees to the workplace that is consistent with the agency's operational needs. The plan will be submitted to the Office of Human Resources (OHR) and approved by the Office of the State Employer prior to implementation. Those employees returning to their workplace must follow department and agency protocols developed for a safe return to work.

Prohibiting In-Person Work

Until such time as the Governor begins allowing further expansion of in-person work, the Michigan Department of Labor and Economic Opportunities (LEO) and all agencies and bureaus within LEO must prohibit employees from working in person to the extent feasible. Recognizing that some employees must report for in-person work, MSHDA will apply all the following to in-person work requests:

- Managers must identify those positions that require in-person work within their return to work plans, as well as define whether full-time or part-time in-person work is required. Managers must also identify sporadic in-person needs.
- Managers must include the reason that the work must be performed in-person, e.g., database connectivity if VPNs are not possible, physical documents or other physical work, equipment needs, etc.
- Trainings and hearing processes that do not require compliance with the Open Meetings Act, must be conducted remotely. Exceptions may be requested and must include an explanation of why such meetings or processes cannot be conducted remotely. The requests must be submitted to OHR and approved by the Office of State Employer.

Exposure Determination

MSHDA 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. The Safe Start Team was responsible for the exposure determination.

MSHDA has determined that its employees' jobs fall into only the lower exposure and medium exposure risk categories as defined by the OSHA Guidance on Preparing Workplaces for COVID-19:

■ **Lower Exposure Risk Jobs.** These jobs do not require contact with known or suspected cases of COVID-19 nor frequent close contact (for example, within six feet) with the general public. Workers in this category have minimal occupational contact with the public and other coworkers. Examples are small offices, small manufacturing plants (less than 10 employees), small construction operations (less than 10 employees), and low-volume retail establishments, provided employees have infrequent close contact with coworkers and the public.

■ **Medium Exposure Risk Jobs.** These jobs are those that require frequent or close contact (for example, within six feet) with people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients. Examples are most jobs at manufacturing plants, construction sites, schools, high-volume retail settings, and other high-population-density work environments.

MSHDA's Safe Start Team verifies that the agency has no high-risk exposure jobs. High exposure risk jobs have high potential for exposure to known and suspected cases of COVID-19. Examples are most jobs in healthcare, medical transport, nursing homes and residential care facilities, mortuaries, law enforcement, and correctional facilities. This plan is not intended for employers who have high exposure risk jobs.

MSHDA has categorized its jobs as follows:

NOTE: Some jobs may have more than one type of exposure risk depending on the task or qualifying factors.

Job/Task	Exposure Risk Determination (Lower or Medium)	Qualifying Factors (Ex. No Public Contact, Public Contact)
Front receptionists	Medium	Public, community contact
Lobby security	Medium	Public, community contact
Equity & Engagement	Medium	Public, community contact
Audit/Mortgage Servicing	Medium	Public, community contact
Marketing	Medium	Public, community contact
Michigan Outreach	Medium	Public, community contact
Office Services	Medium	Public, community contact
Construction	Medium	Public, community contact
Asset Management	Medium	Public, community contact
Business Development Team	Medium	Public, community contact
Non-public facing positions	Lower	Infrequent or no public contact

Engineering Controls

MSHDA has implemented feasible engineering controls to minimize or eliminate employee exposure to SARS-CoV-2. Engineering controls involve isolating employees from work-related hazards using ventilation and other engineered solutions. In workplaces where they are appropriate, these types of controls reduce

exposure to hazards without relying on worker behavior and can be the most cost-effective solution to implement.

For lower exposure risk jobs, new engineering controls are not required. For medium exposure risk jobs, engineering controls can include:

- Installing physical barriers (such as clear plastic sneeze guards) between coworkers or between workers and customers.
- Installing a drive-through window for customer service.
- Increasing the amount of ventilation in the building.
- Increasing the amount of fresh outdoor air that is introduced into the building.

MSHDA's RTF and Safety Coordinator, will be responsible for seeing that the correct engineering controls are chosen, installed, maintained for effectiveness, and serviced when necessary.

DTMB Buildings Operations will work with MSHDA at its Cadillac Place location to see that the correct engineering controls are chosen, installed, and maintained and serviced for effectiveness as often as required.

The following engineering controls have been implemented:

Job/Task	Engineering Control
Public- & internal-facing receptionists	Clear protective barrier
Lobby security	Clear protective barrier
Equity & Engagement	Engineered controls not currently necessary. PPE is appropriate.
Audit/Mortgage Servicing	Engineered controls not currently necessary. PPE is appropriate.
Marketing	Engineered controls not currently necessary. PPE is appropriate.
MI Outreach	Engineered controls not currently necessary. PPE is appropriate.
Office Services	Engineered controls not currently necessary. PPE is appropriate.
Construction	Engineered controls not currently necessary. PPE is appropriate.

Job/Task	Engineering Control
Business Development Team	Engineered controls not currently necessary. PPE is appropriate.

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. MSHDA's RTF will be responsible for seeing that the correct administrative controls are chosen, implemented, and maintained for effectiveness.

The following administrative controls have been established for MSHDA:

Job/Task	Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)
All employees	Maintain at least six feet from everyone on the worksite.
All employees	Promote remote work (telecommuting) to the extent possible.
All employees	Promote flexible work hours (staggered shifts) to minimize the number of employees in the facility at one time.
All employees	Require health screenings prior to start of work, entering building.
All employees	Restrict business-related travel for employees to essential travel only.
All employees	Restrict face-to-face meetings. Communicate with others through phone, email, teleconferencing, and web conferencing.
All employees	Suspend conferences and large in-person meetings until further notice.
All employees	Provide EPA-approved disinfecting supplies to clean workstation surfaces and high-touch common area surfaces.
All employees	Provide employees with non-medical grade face coverings (cloth face coverings).
All employees	Require employees to wear cloth face coverings in building common areas such as lobby, elevators, hallways, restrooms, etc.
All employees	Require customers and the public to wear cloth face coverings.
All employees	Suspend all non-essential visitors.
All employees	Ask sick customers to stay at home until healthy again. Encourage sick customers to use online and phone services.

Job/Task	Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)
All employees	Close breakrooms and areas where social distancing is not possible, i.e., lower level exercise room.
All employees	Promote phone and online communications to minimize in-person contact with public.
All employees	Encourage proper cough and sneeze etiquette by employees, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands.
All employees	Post signage in office locations about COVID symptoms, wearing face masks, hand hygiene, cover your cough, etc.
All employees	Post signage indicating maximum capacity for social distancing in elevators, conference rooms, breakrooms, kitchenettes, supply/storage rooms, etc.
All employees	Replace existing drinking fountains with touch-free fountain/bottle filling stations.
Public-facing positions (Medium exposure)	Limit customer and public access to appointment-only. Post signage at lobby entrance to notify visitors of appointment-only process and provide contact information to arrange an online or phone appointment.

Visitors/Customers and Facility Precautions

During COVID and until further notice, MSHDA will limit customer and public access to appointment-only. Signage notifying visitors and customers of the appointment-only process will be posted at lobby entrance. The notification will provide contact information to arrange an online or phone appointment.

Process for Appointments

Customers whose concerns cannot be addressed remotely may call 517-335-9885 to schedule an appointment at our Lansing office or 313-456-0710 to schedule an appointment at our Detroit office.

Public Communications

MSHDA's website and social media pages will communicate the expectations of customers who visit our offices. Electronic and verbal communication with people who make appointments or contact MSHDA will emphasize all steps they should take to prepare for appointments, including health and safety measures. Customers must wear a mask that covers their mouth and nose and follow all signage to maintain adequate social distancing. They will be asked to attend their appointment alone unless one other family member is needed. Staff will disinfect public spaces between each customer/visitor.

Signage will remind the public of physical distance requirements. Customers and visitors will be advised to not enter the office if they are experiencing COVID-19 symptoms. MSHDA will post DO NOT ENTER signage for those with or exposed to someone with a diagnosis and/or individuals in quarantine, fever, cough, shortness of breath.

Dropping Off Materials, Packages

Staff and visitors, including mail service couriers, who must leave business materials or packages for MSHDA staff may drop off items in the foyer of our Lansing office or the MSHDA reception area in our Cadillac Place location. Signage will be posted indicating the process and designated receptacles.

Hand Hygiene

MSHDA's RTF will be responsible for seeing ensure that adequate handwashing facilities are available in the workplace and that regular handwashing is required. Frequency of such handwashing will be determined in part by factors such as when and how often the employees' hands are potentially exposed to SARS-CoV-2. When handwashing facilities are not available, MSHDA shall provide employees with antiseptic hand sanitizers or towelettes. MSHDA will provide time for employees to wash hands frequently and to use hand sanitizer.

MSHDA shall promote frequent and thorough hand washing, including by providing workers, customers, and worksite visitors with a place to wash their hands. If soap and running water are not immediately available, provide antiseptic hand sanitizers or alcohol-based hand towelettes containing at least 60 percent alcohol.

Disinfection of Environmental Surfaces

Our on-site facility manager, in partnership with our contracted management company MRT for 735 E. Michigan and the Michigan Department of Technology, Management and Budget (DTMB) building management in our Cadillac Place location, will be responsible for seeing that environmental surfaces in the workplace are cleaned and disinfected. Frequency of such disinfection will be determined in part by factors such as when and how often the environmental surfaces are potentially exposed to SARS-CoV-2. When choosing cleaning chemicals, MSHDA will consult information on Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens. Products with EPA-approved emerging viral pathogens claims are expected to be effective against SARS-CoV-2 based on data for harder to kill viruses. The manufacturer's instructions for use of all cleaning and disinfection products will be strictly adhered to (e.g., concentration, application method and contact time, and personal protective equipment).

An enhanced cleaning and disinfection shall be performed after persons suspected or confirmed to have SARS-CoV2-19 have been in the workplace. The cleaning frequency, method, and other needs will follow CDC guidelines.

Personal Protective Equipment (PPE)

MSHDA will provide employees with the types of personal protective equipment, including respirators if necessary, for protection from SARS-CoV-2 appropriate to the exposure risk associated with the job. The employer must follow current CDC and OSHA guidance for personal protective equipment.

All types of PPE are to be:

- Selected based upon the hazard to the worker.
- Properly fitted and periodically refitted as applicable.
- Consistently and properly worn.
- Regularly inspected, maintained, and replaced, as necessary.
- Properly removed, cleaned, and stored or disposed of, as applicable, to avoid contamination of self, others, or the environment.

MSHDA will provide non-medical grade face coverings (cloth face coverings) to employees (cloth face coverings are technically not considered PPE). MSHDA will require employees to wear face coverings in the workplace. MSHDA will consider face shields when employees cannot consistently maintain three feet of separation from other individuals in the workplace.

The following type(s) of PPE have been selected for use:

Job/Task	PPE
Non-public facing (Lower exposure risk)	Face masks (non-medical grade cloth face covering)
Public-facing positions that require in-person contact with the public, community, visitors, contractors. (Medium exposure risk)	Face masks (non-medical grade cloth face covering), gloves, goggles <i>* Additional PPE may be required for medium exposure jobs.</i>
All staff	Face coverings must be worn in compliance with Executive Order 2020-153 and 2020-161 and LEO's departmentwide plan.

For the purposes of this plan, a nonmedical cloth face covering is NOT considered PPE. All employees who are medically able are required to wear a nonmedical cloth face covering in accordance with CDC guidance when at MSHDA office locations. Visitors to MSHDA offices will be provided a disposable mask.

All MSHDA employees will be provided two reusable nonmedical cloth face coverings. Employees using their own masks must adhere to the following:

- Completely cover the mouth, nose, and chin; and are at least as effective as the nonmedical cloth face covering provided to all employees.
- Face coverings worn in the workplace shall NOT be political, offensive or contain vulgar, obscene, abusive, or confrontational gestures, language, pictures, websites, etc. Face coverings representing certain colleges, universities, sports teams, etc. are permissible provided they meet the above-mentioned criteria.
- Face coverings or masks that incorporate a valve or other openings, holes, or visible gaps in the design or material to facilitate easy exhaling are NOT sufficient face coverings because they allow respiratory droplets to be released into the air.
- Neck gaiter tube-style face scarves and open-chin triangle bandanas are also not allowed.
- Face coverings are to be worn in the workplace whenever in shared spaces (e.g., in-person meetings, hallways, restrooms, breakrooms, elevators, lobby, etc.).
- Employees who cannot consistently maintain 3' of separation from other individuals in the workplace should also consider wearing a face shield.

Please contact Human Resources Director or the [agency Safety Coordinator](#) with any questions. Employees who are medically unable to wear a cloth face covering MUST contact MSHDA's [Reasonable Accommodation Coordinators](#) to initiate the reasonable accommodation process. Reasonable accommodations are available to qualified applicants and employees with disabilities.

Health Surveillance

MSHDA will utilize health screening protocols to identify known or suspected cases of COVID-19 among employees and visitors and isolate them from the remainder of the workforce. MSHDA will ensure that all required health surveillance provisions are performed as required.

Upon an employee's return to the workplace, they will be required to participate in daily health screenings. These health screenings are typically comprised of COVID-related questions about symptoms, testing positive, etc. Employees exhibiting [signs of illness](#) or having a fever of 100.4 or above will not be permitted into the building. These health screenings can occur through one or more ways (e.g., completion of a questionnaire; attest they are fever and symptom-free each time they login to their state-issued electronic devices (e.g., computers, notebooks, tablets, cell phones, etc.) or swipe their employee identification badge/access card to enter restricted areas (e.g., parking lot, buildings, rooms, locked

storage areas, etc.); or some other alternative method (e.g., MI Symptoms app, etc.). All alternative health surveillance methods and processes **MUST** be approved by OSE prior to implementation.

MSHDA will similarly screen contractors, suppliers, and any other individuals entering the worksite.

Employees must promptly report any signs and symptoms of COVID-19 to the Human Resources Director before and during the work shift.

Feeling Sick and Work-Related Post-Exposure Evaluation & Follow-Up

Employees should **stay home** and contact their immediate supervisor and healthcare provider if they have a fever, cough, or other symptoms, or believe they might have COVID-19. Employees should contact their Human Resources Director if they, a family member, or someone they live with tests positive for COVID-19 so they can trace and monitor others with whom they have been in close contact while at work. The evaluation of a work-related exposure incident, follow up, and coordination of proper cleaning and disinfecting activities will be conducted by Human Resources.

During their work shift employees must promptly report any signs and symptoms of COVID-19 to Human Resources via telephone or online resources. In-person contact is prohibited.

MSHDA will physically isolate any employees with known or suspected COVID-19 from the remainder of the workforce, using measures such as, but are not limited to:

- Not allowing known or suspected cases to report to or remain at their work location.
- Sending known or suspected cases to a location (for example, home) where they are self-isolating during their illness.
- Assigning known or suspected cases to work alone at the location where they are self-isolating during their illness.

When an employee is identified with a confirmed case of COVID-19, the Human Resources Director will notify the local public health department immediately, and any co-workers, contractors, or suppliers who may have come into contact with the person who is the confirmed case of COVID-19, within 24 hours. When notifying coworkers, contractors, and suppliers, MSHDA will not reveal the name or identity of the confirmed case.

MSHDA 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 guidelines from the CDC.

Recordkeeping

Per the [MIOSHA Emergency Rule](#), MSHDA shall maintain all COVID-19 employee training records, health surveillance records, and records of required notifications. The following records will be maintained for one (1) year from the date of generation:

1. Required training.
2. A record of daily entry self-screening protocol for all employees or contractors entering the workplace, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19.
3. When an employee is identified with a confirmed case of COVID-19.
4. The notification of a known case of COVID-19 to the local public health department and any co-workers, contractors, or suppliers who may have come into contact with the person.

MSDHA's Human Resources Director will ensure that the records are kept.

Resources, Websites and Contacts

- [State of Michigan Executive Orders & Directives](#)
- [State of Michigan Agency/Department Return to Work Plans](#)
- [DHHS Epidemic Orders](#)
- [Michigan.gov/coronavirus](#)
- [MIOSHA COVID-19 Resources](#)
- [MIOSHA Emergency Rules](#)
- [MIOSHA General Industry Safety & Health Standards](#)
- [CDC](#)
- [OSHA COVID-19 Resources](#)
- [Michigan Department of Labor and Economic Opportunities Return to Work Framework](#)

Unsafe conditions or violations of the protocols established in this plan should be reported to:

Chris Hudson, Safety Coordinator

HudsonC5@Michigan.gov

(517) 335-9904

OR

Lori Fedewa, Human Resources Director

FedewaL2@Michigan.gov

(517) 599-6968

OR

You can send an email to:

[MSHDA-Human-Resources-General](#) or call (517) 241-6281.