



**SUBJECT:** Reasonable Accommodations for Protected Individuals, Department Safety Program, and Lead Exposure

**TO:** Members of the Department

This Order establishes department policy and member responsibilities for the following:

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## 24.1 REASONABLE ACCOMMODATIONS FOR PROTECTED INDIVIDUALS UNDER THE AMERICANS WITH DISABILITIES ACT (ADA) TO PERFORM ESSENTIAL JOB FUNCTIONS

This section provides guidance in applying and providing reasonable accommodations for qualified protected individuals to perform essential job functions and applies to the selection, placement, recruitment, training, promotion, transfer, assignment, and reassignment of individuals presently on the job, those returning from disability or medical leave, and applicants for employment. This section establishes the department's compliance with [Section 504 of the Rehabilitation Act of 1973 \(Section 504\)](#), [29 U.S.C. 701 et seq.](#), the [Persons with Disabilities Civil Rights Act, MCL 37.1101 et seq.](#), the [Americans with Disabilities Act of 1990, as amended \(ADA\)](#), [42 U.S.C. 12101 et seq.](#), and [ADA Accessibility Guidelines](#).

### 24.1.1. DEFINITIONS

- A. **Disability:** A physical or mental impairment incurred on or off duty, which substantially limits one or more of the major life activities of such individual; a record of such impairment; or being regarded as having such an impairment. Major life activities include functions such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.
- B. **Essential Job Duties or Functions:** Essential job duties are contained in the standard Civil Service position description on file for all positions.
- C. **Qualified Protected Individual:** An individual whose background meets the education and experience qualifications, as defined by Civil Service, and who, with reasonable accommodation, can perform the essential job functions of the position in question.
- D. **Reasonable Accommodation:** An adjustment made to a job or the work environment that enables a qualified protected individual to perform the essential job functions of that position without causing an undue hardship on the employer.

E. Undue Hardship:

- (1) A hardship caused by an expense that would be cost prohibitive under the budget or a requirement that would change a program's operation. Undue hardship shall be determined on a case-by-case basis by evaluating the impact of the required adjustments on the appointing authority's operation of its program.
- (2) In determining whether an accommodation would impose an undue hardship on the operation of the program in question, the department shall consider the following factors:
  - a. The overall size of the department's program with respect to the number of members, number and type of facilities, and size of budget.
  - b. The type of the department's operation, including the composition and structure of the department's work force.
  - c. The nature and cost of the accommodation needed. In estimating a financial hardship, the department shall consider the resources of the agency as a whole and not simply the particular program in question.

24.1.2. IDENTIFICATION AS AN INDIVIDUAL WITH A DISABILITY BY CIVIL SERVICE

A person may identify as an individual with a disability by completing the appropriate Civil Service form CS-1668, Reasonable Accommodation Request – (ENC-071), and submitting them to Civil Service. Civil Service certification as a protected individual is voluntary and refusal to provide information regarding a disability will not subject one to discharge or disciplinary treatment. Information obtained by Civil Service concerning a disability is confidential and is not shared with department representatives. Identification by Civil Service as a protected individual does not necessarily meet the standards for a disability under the ADA.

24.1.3. RETURN FROM DISABILITY LEAVE

An individual returning from disability leave shall comply with the contract agreement of the appropriate bargaining unit and/or with rules of the Civil Service Commission, whichever is applicable. If the individual requires an accommodation for a disability to facilitate the return to work, information regarding the disability may be required to determine the appropriate reasonable accommodation for the situation.

24.1.4. SELF-IDENTIFICATION

- A. A member or applicant may self-identify as a protected individual to the department. The disability manager may request medical verification of the disability. Information obtained shall be confidential, except as noted below.
- B. Exceptions to the policy of confidentiality:
  - (1) Supervisors and managers may be informed of work/duty restrictions and necessary accommodations.

- (2) First aid and safety personnel may be informed, when and to the extent appropriate, that the individual might require emergency treatment or special consideration for emergency evacuation or other safety-related concerns.
- (3) Government officials may be informed when investigating compliance with [Section 504](#) or the ADA.

#### 24.1.5. DUTIES OF THE ADA REASONABLE ACCOMMODATION COORDINATOR

The disability manager shall serve as the agency's ADA Reasonable Accommodation Coordinator (coordinator). Duties of the coordinator shall include monitoring and facilitating the agency's compliance with the ADA. This may include dissemination of information to management and member's ensuring positions are surveyed to determine actual job requirements, identifying ways to modify positions, implementing sensitivity training, and tracking member progress.

#### 24.1.6. REASONABLE ACCOMMODATION PROCEDURE

##### A. ADA

- (1) The ADA requires reasonable accommodations be made based on available medical information and the individual's work assignment.
- (2) These procedures do not expand or diminish the employer's obligations or the individual's rights as currently provided in state and federal law.

##### B. Accommodation Process

The accommodation process is designed to make adaptations or adjustments in an individual's work site or work schedule whenever possible.

- (1) Employee accommodation services may be provided without using the formal request process if all parties agree. However, the following steps are required when using an informal process:
  - a. Supervisor or employer discussion with the employee or applicant about the request.
  - b. Adherence to time frames in the formal process.
  - c. Meeting of all coding, bidding, and document requirements for purchasing accommodation services and equipment.
  - d. Completion of a memo to the coordinator with the name of the person, date of the informal request, date accommodations were completed, and description of accommodations.
  - e. Consultation with the coordinator if the informal request may be denied.
- (2) The formal process to follow (or if the informal request is denied).
  - a. Request an accommodation form, CS-1668, Reasonable Accommodation Request – (ENC-071), from the Human Resources Division or from the

Human Resources website, under Disability Management. Complete the form as instructed.

- b. Once completed, the form shall be forwarded to the Human Resources Division with the necessary medical documentation attached. A response shall be given within eight weeks from the date the completed form is received by the Human Resources Division.
- (3) The individual making the request should retain a copy.
- a. The following forms are available on the Official Forms website:
    - i. CS-1668, Reasonable Accommodation Request – (ENC-071)
    - ii. CS-1669, Reasonable Accommodation Response - (ENC-072)
- C. If the coordinator and the supervisor determine that the accommodation requested by the individual cannot be provided under the limits of their authority, is not an appropriate accommodation, or that it requires more specific information to make an appropriate decision, the request shall be referred to the Reasonable Accommodation Committee consisting of the coordinator, the Equal Employment Opportunity Officer, and the affected district/division commander.
- (1) The committee shall review the request and, within 21 working days, make a recommendation to the deputy director of the bureau in which the request originated.
  - (2) The individual requesting the accommodation and the individual's immediate supervisor shall have the right and the opportunity to attend the meeting to address the committee.
  - (3) Within 15 working days from receipt of the committee's recommendation, the deputy director of the bureau where the request originated shall advise the individual, the supervisor, and the coordinator of his or her decision.
- D. If there is question about a reasonable accommodation violating a labor contract, the request shall be forwarded to the Labor Relations Manager, Human Resources Division, for review and the section shall provide advice to the unit representative.

#### 24.1.7. DEPARTMENT OF TECHNOLOGY, MANAGEMENT, AND BUDGET APPROVAL PROCEDURE

When equipment is ordered to comply with a reasonable accommodation request, the following sentence shall be inserted on the purchase requisition: "This equipment is required for an individual with a disability to perform work duties and responsibilities."

#### 24.1.8. IMPLEMENTATION AND EVALUATION OF A REASONABLE ACCOMMODATION

- A. An approved reasonable accommodation shall be provided as soon as administratively possible.
- B. Sixty days after the reasonable accommodation has been provided, the individual and the immediate supervisor shall complete a CS-1670,

Reasonable Accommodation Evaluation – (ENC- 073), a written evaluation of the accommodation and submit it to the coordinator. This evaluation shall be in memorandum form, on a UD-040, and shall identify whether the accommodation has shown the intended results.

- C. Thereafter, the supervisor or the individual shall discuss issues/problems regarding the accommodation if they should later develop.

#### 24.1.9. CRITERIA FOR PROVISION OF A REASONABLE ACCOMMODATION

- A. In providing a reasonable accommodation, two primary factors should be used to determine which of several proposed recommendations are used: the suitability of the accommodation and its cost effectiveness. Other secondary factors such as the impact on other members and the availability of equipment may also be used in making this determination.

- (1) Use existing resources first:

- a. Reorganize office space
- b. Reorganize current equipment
- c. Reassign job duties
- d. Reassign individuals
- e. Modify job functions, without changing essential job functions

- (2) Purchase new equipment

- (3) Reasonable accommodation applies to all aspects of the work situation, not just recruitment and placement. Individuals with a disability shall be offered opportunities to request reasonable accommodations in all aspects of the work environment, such as opportunities for promotion, training programs, and assignments. Reasonable accommodation is a process that begins with recruitment and stops only when the protected individual leaves employment.

- (4) Reasonable accommodation does not encompass responsibility for personal care or personal devices not directly related to the performance of essential job skills. The employer is not responsible for providing transportation to and from the work site or the provision of devices used outside of work hours or for non-work purposes (e.g., the employer is not responsible for provision of such items as eyeglasses or hearing aids).

#### 24.1.10. BASIC EXAMPLES OF REASONABLE ACCOMMODATION

- A. Job restructuring is a reasonable accommodation that can be made for protected individuals who can perform the essential job responsibilities with reasonable accommodation but who may have difficulty performing auxiliary job functions.

- (1) Examples of possible job restructuring accommodations may include:

- a. For a hearing-impaired secretary, transfer telephone duties to another member in exchange for filing duties.

- b. For a mobility-impaired individual, assign field responsibility in the immediate area of the individual's home or office location.
- c. For insulin-dependent diabetics, reschedule lunch hour duties so the individual may have a permanent lunch hour schedule.

(2) Examples of possible accessibility accommodations may include:

- a. For a mobility impaired individual, locate their desk or office close to accessible entrances, restrooms, etc.
- b. For a visually impaired individual or a wheelchair user, rearrange furniture and equipment to provide clear access.
- c. To adjust for an individual's height differences, raise or lower office furniture.

B. Use of equipment and devices:

(1) Protected individuals will generally not require extensive or expensive equipment or devices in order to perform essential job duties.

(2) Examples of some of the more commonly used devices are the following:

- a. For hearing impaired individuals, provide an amplifier on their telephone.
- b. For the visually impaired individual, provide a large numbered dial on their telephone.
- c. For individuals with one arm, provide clipboards.
- d. For individuals who may have difficulty reaching or seeing material in regular hanging files, provide horizontal desk trays for easy access to files.

#### 24.1.11. QUESTIONS ON REASONABLE ACCOMMODATIONS

Questions regarding reasonable accommodations shall be directed to the Human Resources Division.

### **24.2 REASONABLE ACCOMMODATIONS FOR PROTECTED INDIVIDUALS UNDER THE AMERICANS WITH DISABILITIES ACT (ADA) TO ACCESS DEPARTMENT SERVICES**

All provisions that apply to reasonable accommodation for persons with disabilities that apply for employment listed in Section 24.1 also apply to providing department services to residents and visitors of Michigan. Therefore, department members shall ensure that those who require an accommodation to access department services are provided reasonable accommodations when needed.

#### 24.2.1 BASIC EXAMPLES OF REASONABLE ACCOMMODATIONS TO ACCESS DEPARTMENT SERVICES

A. Reasonable accommodations for individuals with mobility disabilities

To ensure persons with mobility disabilities are able to access department personnel or services, members shall make all reasonable efforts to reasonably accommodate the individual's needs. Individuals have different mobility needs and, as such, accommodations will vary greatly. Some examples of reasonable accommodations include, but are not limited to:

1. Permitting the use of a service animal;
2. Meeting with a person at a location that is accessible, such as outside the work site or at their home;
3. Removing barriers to access, such as opening doors or meeting individuals in a place with no stairs.

B. Reasonable accommodations for individuals with mental disabilities

Individuals with mental disabilities have diverse needs based on their level of cognitive impairment. Members shall treat all that they encounter with dignity and respect regardless of their disability and members shall, without putting officer safety at risk, accommodate those with mental disabilities whenever possible. Some examples of reasonable accommodations include, but are not limited to:

1. Permitting the use of a service animal;
2. Using simple words and phrases consistent with the individual's level of cognitive understanding;
3. Provide the individual with enough time to compose their thoughts and respond to questions without rushing them or finishing their answers for them.

C. Reasonable accommodations for individuals with sight disabilities

Individuals with sight disabilities have diverse needs based on the level of disability and amount of time they have had the disability. For example, someone who has been completely blind for the lifetime may be more adapt to interacting with their environment than someone who has recently lost their sight. However, members shall, without putting officer safety at risk, ensure that they provide reasonable accommodation to individuals with sight disabilities based on their individual needs. Oftentimes, members must merely ask an individual to determine his or her individual needs. Some examples of reasonable accommodations include, but are not limited to:

1. Permitting the use of a service animal;
2. Permitting the use of a guide cane or long cane (white walking stick) and permitting the individual to keep their cane, unless doing so would put the member or others in danger;
3. Providing clear, verbal directions to the individual taking into account their inability to visually perceive their environment.

D. Reasonable accommodations for individuals who are deaf or hard of hearing

To ensure effective communication with a person who is deaf or hard of hearing involved in an incident, various communication aids shall be used, including, but not limited to:

1. The use of a note pad and pen or pencil to exchange written notes;

2. Use of an assistive listening device;
3. Using non-verbal cues, e.g. hand gestures, head nods or shakes to communicate yes and no, or using the [deaf or hard of hearing visor card](#);
4. Or use of a qualified oral or sign language interpreter.

The type of aid that is required for effective communication depends on the individual's usual method of communication, and the nature, importance and duration of the communication at issue.

## 24.3 DEPARTMENT SAFETY PROGRAM

The objective of the Safety Program is to prevent work site accidents by identifying and eliminating hazardous conditions, establishing safe practices, and motivating and instructing members of the department to perform their duties safely. This section defines the Safety Program and identifies administrative responsibility.

### 24.3.1. SAFETY OFFICER

- A. The Human Resources Division's Disability Management Unit Manager is the department health and safety officer.
- B. The health and safety officer shall:
  - (1) Prepare and disseminate safety policy statements and directives.
  - (2) Establish and use the services of technical experts when required.
  - (3) Devise adequate inspection and reporting procedures and determine specifications for periodic inspections.
  - (4) Keep work site accident records and execute required reports.
  - (5) Analyze reports of work site accidents and initiate appropriate remedial measures.
  - (6) Maintain liaison between the department and the [Michigan Occupational Safety and Health Administration \(MIOSHA\)](#), [Michigan Department of Labor and Regulatory Affairs](#), and the [Department of Technology, Management, and Budget](#).

### 24.3.2. SAFETY COMMITTEES

- A. Safety committees shall be established according to the individual collective bargaining agreements.
- B. Safety committees shall be comprised of:
  - (1) Representatives from Human Resources Division.
  - (2) Representatives from each collective bargaining unit.
  - (3) Representatives from management.

- C. The safety committees shall:
  - (1) Propose resolutions for health and safety hazards that may exist at department work sites.
  - (2) Provide recommendations to the health and safety officer regarding health and safety hazards.
  - (3) Propose safety education programs to the health and safety officer.
  - (4) Assist with the inspection of work sites for health and safety hazards.
  - (5) Act as a resource for safety related matters.
  - (6) Perform functions established in collective bargaining agreements.
- D. Safety committees shall meet semi-annually or when notified of an unresolved health and safety hazard or as set forth in collective bargaining agreements.

#### 24.3.3. COMMANDERS' RESPONSIBILITIES

- A. Commanders at all levels shall conduct a continuous and vigorous effort toward the prevention of accidents in all department operations and activities.
- B. Specific duties for commanders include the following:
  - (1) Make plans for the control of physical hazards.
  - (2) Arrange for the promotion of safe operating practices and procedures.
  - (3) Promote the use of safe, properly guarded tools and equipment.
  - (4) Insure the provision of safety training, especially motor vehicle safety.
  - (5) Assure comprehensive investigation of all work site accidents.

#### 24.3.4. REPORTING SAFETY HAZARDS

- A. Safety hazards shall be reported immediately to the work site commander.
- B. Safety hazards that cannot be resolved at the local level shall be reported to the health and safety officer.
- C. The Human Resources Division shall refer unresolved safety hazards to the appropriate safety committee.

### 24.4 LEAD EXPOSURE PROGRAM

#### 24.4.1. PURPOSE

The department is committed to reducing the occupational exposure to lead at any level in accordance with the [Michigan Occupational Safety and Health Administration's \(MIOSHA\) Health Standard, Part 310, Lead \(as amended February 24, 2015\)](#).

A. Members Covered

Any members exposed to lead due to their handling of firearms or ordnance are covered by this program, including: enlisted members, motor carrier officers, state property security officers, pistol team members, and Forensic Science Division (FSD), Firearms and Tool Marks Unit forensic technicians.

B. Member Responsibilities

All members covered under this program are responsible for:

- (1) Completing all lead exposure training.
- (2) Demonstrating an understanding of the tasks involving potential exposure to lead.
- (3) Conducting all operations in accordance with established work practice controls.

24.4.2. EXPOSURE

A. Members are most commonly exposed to lead when handling and discharging firearms. Lead can enter the body when absorbed, ingested, or inhaled. Lead adversely affects numerous body systems and causes forms of health impairment and disease which arise after periods of exposure as short as days or as long as several years. Overexposure to lead may result in severe damage to blood forming, nervous, urinary, and reproductive systems. Some common symptoms of chronic overexposure include loss of appetite, metallic taste in the mouth, anxiety, constipation, nausea, pallor, excessive tiredness, weakness, insomnia, headache, nervous irritability, muscle and joint pain or soreness, fine tremors, numbness, dizziness, hyperactivity and colic. Members who are routinely exposed to lead and have any of these symptoms should consult with their physician and obtain a blood lead level test.

B. Personal Hygiene Practices

- (1) Members shall wash their hands with a waterless hand cleaner or with soap and water.
- (2) Members should wash their face, arms, and hands with soap and water:
  - a. When work is completed.
  - b. Before leaving a firearm range.
  - c. Before eating, drinking, smoking, applying makeup, changing contact lenses, or using the bathroom.

C. Other Safety Practices

- (1) The storage, preparation, and consumption of food, chewing gum, smokeless/chewing tobacco, and drinks are prohibited in work areas where there is the potential for exposure to lead.
- (2) Applying cosmetics or lip balm and the handling of contact lenses is prohibited in work areas where there is a potential for exposure to lead.
- (3) Gloves are recommended while picking up brass. Do not collect fired brass cartridges in hats.

- (4) Members who shoot, compete, or utilize other indoor firearms ranges, sportsmen's clubs or other non-departmental indoor firearms facilities should be aware of potential poor ventilation or lack of proper air filtration which may occur at these facilities. They should take precautions to prevent the ingestion of lead by utilizing proper prevention equipment such as a respirator, limiting their exposure, or abstaining from exposing themselves to these conditions.
- (5) Members who cast their own lead projectiles or reload their own ammunition are recommended to take measures to prevent exposure to lead. Inhalation measures should be utilized while casting projectiles or separating brass cartridges from tumbling media. Absorption measures recommended include wearing gloves while handling lead bullets, cartridge cases or other equipment routinely exposed to lead projectiles.

#### 24.4.3. LEAD LEVEL MONITORING

##### A. Members to Be Monitored:

- (1) Firearms Instructors Permanently Assigned to the Training Division

Firearms instructors permanently assigned to the Training Division, Ordnance and Marksmanship Unit shall have their blood lead level tested twice a year when there is no recruit school. When there is a recruit school, instructors will be tested three times (prior to each recruit school beginning, midway through, and after the school ends) at no cost to the member. The Human Resources Division, Disability Management Unit, is to be contacted by the Training Division to schedule the lead level tests with the department's medical provider.

- (2) Firearms Instructors Temporarily Assigned to Training Division

Firearms instructors temporarily assigned to the Training Division, Ordnance and Marksmanship Unit, shall have their blood lead level tested at the beginning, midway through, and after the school ends at no cost to the member. The Human Resources Division, Disability Management Unit, is to be contacted by the Training Division to schedule the lead level tests with the department's medical provider.

- (3) Certified Firearms Instructors Assigned to Various District/Division Locations

Field personnel designated by districts and divisions who are trained/certified as firearms instructors during the initial firearms instructor schools by the Ordnance Unit and are responsible for district/division and work site personnel firearms instruction shall have their blood lead level tested at the annual certification training at no cost to the member.

The Human Resources Division, Disability Management Unit, is to be contacted by the Training Division to schedule the lead level tests with the department's medical provider. Blood lead level testing is required. The member shall not perform firearms instructor duties until the annual test has been performed and comes back satisfactorily.

- (4) Pistol Team Members

Members selected to represent the department in specific pistol competitions shall be tested in the fall, after the outdoor competition season is completed (normally in September).

(5) Firearms Examiners Permanently Assigned to the Forensic Science Division (FSD)

Firearms examiners permanently assigned to the various laboratories in the FSD shall have their blood lead level tested once a year at no cost to the member. The FSD shall schedule the lead level tests to coordinate with their annual training.

B. Blood Lead Levels

- (1) MIOSHA regulations state when a blood lead level is at or above 30 micrograms, an individual should be removed from the task or duty causing the raised level.
- (2) According to Sparrow Hospital Laboratory and other laboratories used throughout the state for determining blood lead levels, an individual's exposure should be decreased if their blood lead level is greater than 20 micrograms, which shall serve as the department standard.
- (3) Once blood lead level results are received, a copy shall be maintained in the member's personnel file and a copy shall be sent via U.S. Mail to their home address on record.

C. Procedures for Elevated Levels

- (1) Members who have been tested and their supervisor shall be contacted via telephone and advised that the member's levels are elevated greater than 20 micrograms and they shall immediately be relieved of their instructor duties.
- (2) The Training Division and Forensic Science Division shall be advised that the member shall immediately be relieved of their duties involving contact with exposure to lead (i.e., instructor duties, firearms test firing, etc).
- (3) Once the member has been removed from any lead exposure, they will be given two weeks to expel lead from their system and shall be sent for a second blood draw/test as soon as practical.
- (4) If the results of the second blood test show a level of less than 20 micrograms, the member shall be allowed to return to their firearms instructor or firearms examiner duties, but shall be sent for a third blood test one month after the second blood test.
  - a. If the third test results are less than 20 micrograms, the member may continue to perform these firearm duties.
  - b. If the third blood test results reveal a level greater than 20 micrograms:
    - i. The firearms instructor shall be prohibited from performing firearms instructor duties until the Ordnance Unit can determine the cause of the high exposure and steps are taken to prevent further unnecessary exposure.
    - ii. The firearms examiner shall be removed from contact with exposure to lead until the FSD health and safety officer can determine the cause of the high exposure.
- (5) If the second blood test results reveal a level greater than 20 micrograms:
  - a. The firearms instructor shall continue to be prohibited from returning to firearms instructor duties until the Ordnance Unit can determine the cause of the high exposure and steps are taken to prevent further unnecessary exposure.

b. The firearms examiner shall be relieved of duties involving exposure to lead until the FSD health and safety officer can determine the cause for the high exposure.

(6) Members shall be allowed to continue to participate in the spring, summer, and fall firearms qualification shoots due to the limited time frame of the exposure.

#### 24.4.4. AIR MONITORING

##### A. Training Academy Indoor Firearms Range

MIOSHA prohibits employee lead exposure from exceeding the permissible exposure limit (PEL) of 50 ug/m<sup>3</sup> averaged over an 8-hour time period.

MIOSHA also stipulates that employers continue to monitor employee exposures if an Action Level (AL) of 30 ug/m<sup>3</sup> is exceeded. In order to ensure the safety of our members, air monitoring shall be conducted approximately semi-annually. This shall depend on range usage/availability and following the more extensive range cleaning, which is contractually conducted every six months.

(1) Equipment (pump and sampling media) is borrowed from MIOSHA-CET.

(2) The samples shall be processed at the MIOSHA Laboratory and provided to the department and members involved during the sampling.

##### B. Forensic Science Division Indoor Ranges

The FSD health and safety officer shall conduct periodic air monitoring tests based upon results of annual blood lead level and periodic surface wipe sample tests.

#### 24.4.5. LEAD LEVEL SURFACE WIPE SAMPLE TESTING

##### A. Training Academy Indoor Firearms Range

Surface wipe sample testing shall be coordinated and conducted with the department industrial hygienist located at FSD. Testing shall be completed periodically throughout the Firearms Range area. The schedule of testing shall be determined by the amount of firing being conducted on the range, or if the results are high and need to be monitored.

##### B. Forensic Science Division Indoor Ranges

Conduct surface wipe sample testing periodically at each of the FSD indoor firearm ranges located throughout the state.

#### 24.4.6. HOUSEKEEPING

##### A. Training Academy's Indoor Firearms Range

###### (1) Lead Clean-up

a. The Department of Technology, Management, and Budget (DTMB) and the Ordnance Unit shall be responsible for lead clean up.

b. DTMB will be responsible for monitoring any contract that is established to clean the range if the Ordnance Unit is no longer responsible. The Ordnance Unit will coordinate with DTMB for scheduling and monitoring purposes.

- c. The Ordnance Unit is responsible for daily lead clean up, all permanent staff or designees shall participate in the Lead Supervisor training coordinated through the Michigan Department of Health and Human Services, Healthy Homes Section which meets the Michigan Lead Abatement Act's requirements.
  - d. The Ordnance Unit will clean the range based on frequency of use, wipe testing, and air monitoring.
- (2) Security at the Training Academy
- a. The department authorizes access to the firearms range.
  - b. The DTMB sets up codes for access.
  - c. The department runs background checks for clearance to the firearms range.
- (3) Ventilation at the Training Academy
- a. The green light over the control panel indicates if shooting can take place on the range. If the light turns red, shooting shall stop until the ventilation system renders the air safe enough for shooting to continue.
  - b. All supply vents (diffusers) along the back wall shall be maintained free of obstructions. Nothing shall be stored in front of the vents.
  - c. Visual filter checks and differential pressure drop readings shown in the ventilation system's DDC Visual Control Graphics, will be used to indicate when the ventilation system's filters need to be changed.
  - d. The ventilation system's filters are changed by the Ordnance Unit Lead certified staff or contractor based on the differential pressure drop readings shown in the DDC Visual Control Graphics. These readings are documented weekly (every Friday), and readings shall not exceed:
    - i. Mid/Bag filter pressure reading is not to exceed 4.0
    - ii. Overall reading (combination of Mid and HEPA filters) is not to exceed 6.0
- (4) Lighting
- The DTMB is responsible for changing burnt-out lights.
- (5) Scheduling
- a. The department shall provide schedules for the range.
  - b. The DTMB oversees the contractors' schedules.
- (6) Janitorial Cleaning in the Firearms Range area
- a. The DTMB provides staff for cleaning offices.
  - b. The DTMB provides staff for cleaning restrooms.
  - c. The DTMB provides all equipment used for cleaning. This equipment shall not be removed from the range area.

(7) Lead/Brass Removal

The Ordnance Unit is responsible for recycling the lead and brass shell casings from the range.

- a. The Ordnance Unit will be responsible for maintaining documentation showing where the lead/brass was recycled.
- b. All funds obtained from recycling will be used for range maintenance or upgrades.

24.4.7. TRAINING AND INFORMATION

A. Members

Training and information for members who shall have occupational exposure to lead shall include Appendices A and B (pages 12 through 18) of the current MIOSHA Occupational Health Standard, Part 310, Lead.

- (1) Additional training shall be provided whenever tasks or procedures are modified or newly assigned such that there is a significant change in the exposure or exposure potential.
- (2) Opportunities for members to ask questions shall be provided.

24.4.8. RECORDKEEPING

- A. Records associated with a member's exposure to lead shall be maintained for not less than 40 years, or for at least 20 years after a member's termination of employment, whichever is longer, per [MIOSHA Occupational Health Standard, Part 310, Lead](#).
- B. Records associated with member medical information shall be maintained for not less than the duration of employment plus 30 years, per MIOSHA Part 70, Employee Medical Records and Trade Secrets.
- C. The Human Resources Division, Disability Management Unit, is responsible for the maintenance of all required medical records. These confidential records are kept in the Human Resources Division.
- D. Member medical records are provided within 15 working days upon the request of the member or to anyone having written consent of the member. Such requests shall be sent to the Human Resources Division, Disability Management Unit.
- E. Training Records

- (1) An Annual Training Recertification Record, UD-034, shall be completed at the conclusion of training and retained at the work site for a period of the current year plus one.

Records for individual members shall be forwarded to the Human Resources Division at the end of this period for retention in the member's personnel file.

- (2) Information on the Training Record form, UD-034, shall include:
  - a. Date of the training session.
  - b. Content or summary of the training session.

- c. Name(s) and qualifications of the person(s) conducting the training.

#### 24.4.9. GENERAL PROGRAM MANAGEMENT

##### A. Responsibility

- (1) The Human Resources Division shall be responsible for the implementation of the Lead Exposure Program, and its Disability Management Unit shall:
  - a. Maintain, review, and update the Lead Exposure Program at least annually, and whenever necessary to include new or modified tasks and procedures.
  - b. Ensure that all medical actions required are performed, and that appropriate department members' health and MIOSHA records are maintained.
  - c. Be responsible for making the plan available to MIOSHA.
- (2) The Training Division shall be responsible for the initial training of recruits, as well as enforcement members during annual first aid training.
  - a. The material presented shall include instruction in locating the written Lead Exposure Program plan on the department's Intranet.
  - b. The Training Division shall document all Lead Exposure Program training presented.
- (3) The FSD health and safety officer shall be responsible for the initial training of new hires and the annual training of Firearms and Tool Marks Unit forensic technicians, documentation of training, and making these members aware that the written plan is available on the department's Intranet. NOTE: Enlisted FSD members shall continue to receive their annual training through the Training Division.

##### B. Review and Update of Program

The Lead Exposure Program shall be reviewed and updated:

- (1) Annually, on or before December 31 each year.
- (2) When new or modified tasks and procedures are implemented which affect occupational exposure of department members.
- (3) When new functional positions are established that may involve exposure to lead.
- (4) To reflect changes in technology that eliminates or reduces exposure to lead.

#### 24.5 REVISION RESPONSIBILITY

Responsibility for continuous review and revision of this Order lies with the Human Resources Division and State Services Bureau (Training Division), in cooperation with the Office of the Director.

DIRECTOR