

# COVID-19 Preparedness & Response Plan for Lower & Medium Risk Employees

## a) General

The following Coronavirus/COVID-19 Preparedness & Response Plan has been established for the Office of Children's Ombudsman (OCO) in accordance with the latest <a href="Executive Directives"><u>Executive Directives</u></a>, <a href="MIOSHA Emergency Rules">MIOSHA Emergency Rules</a>, <a href="DHHS Epidemic Orders">DHHS Epidemic Orders</a>, and <a href="CDC">CDC</a> <a href="guidance">guidance</a>.

The Office of Children's Ombudsman (OCO) does not plan to transition its employees back to the office until the State of Michigan enters Phase 6 of the Governor's Safe Start Plan. The OCO does not currently have a physical office. This plan will be updated when a physical office is available for occupancy.

The OCO's main Infection Control Measure will be keeping the physical OCO office closed and remain in a 100% telecommute workplace. The OCO office in Detroit is located within Cadillac Place. OCO staff who chooses to go into the Cadillac Place office on a limited basis will be required to follow any protocol established by DTMB for the Cadillac Place building. This plan may be further expanded and developed in collaboration with staff and building management.

This plan will be made available to employees via the OCO's website, SOM email and the OCO's shared drive located at S:\Common.

The OCO 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 exposure to COVID-19. Please direct employees with questions to their Human Resources Director.

# b) Exposure Determination

OCO will evaluate routine and reasonably anticipated tasks and procedures for all employees to determine whether there is actual or reasonably anticipated employee

exposure to COVID-19. The Director, Deputy Director or designee will be responsible for seeing that exposure determination is performed.

OCO shall categorize all its employees' jobs into the following risk categories:

- ♣ Lower exposure risk jobs. These jobs are those that do not require contact with people known to be, or suspected of being, infected with SARS-CoV-2 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.
- Medium Exposure Risk Jobs. These jobs include those that require frequent and/or close contact (e.g., within 6 feet) people who may be infected with COVID-19, but who are not known or suspected COVID-19 patients. In areas without ongoing community transmission, workers in this risk group may have frequent contact with travelers who may return from locations with widespread COVID-19 transmission. In areas where there is ongoing community transmission, employees in this category may have contact with the general public and coworkers.

The OCO has determined that the following positions/jobs/tasks have been determined to have the following exposure determination(s).

Positions/job/task	Determination	Qualifying Factors (i.e. no public contact, public contact, job task description)		
Director	Lower	Office working where contact with people who may be infected with COVID-19, but who are not known or suspected COVID-19 patient. Frequent contact with the public in common areas of main office location and in the field.		
Deputy Director	Lower	Same as above		
Chief Investigator	Lower	Same as above		
Investigator	Lower	Same as above		
Analyst	Lower	Office working where contact with people who may be infected with COVID-19, but who are not known or suspected COVID-19 patient. Frequent contact with the public in common areas of main office location		
SEMA	Lower	Office working in an apartment		

building where contact with
people who may be infected
with COVID-19, but who are
not known or suspected
COVID-19 patient. Frequent
contact with the public in
common areas of main office
location

## c) Engineering controls

OCO has implemented feasible engineering controls to prevent employee exposure to COVID-19. Engineering controls involve isolating employees from work-related hazards. 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. Engineering controls for COVID-19 include, but are not limited to:

- Installing physical barriers, locked front door.
- Socially distant office spaces.

The Director, Deputy Director or designee will be responsible for seeing that the correct engineering controls are chosen, installed, maintained and serviced for effectiveness as often as required.

The following engineering controls have been implemented.

Positions/job/task	Engineering Control	
All OCO positions	Locked Front Office Door, Locked building entrance, Socially distant office space, one direction hallways and pathways, removal of seats in breakroom.	

# d) Administrative Controls

Administrative controls are workplace policies, procedures and practices that minimize or eliminate employee exposure to the hazard. The Director, Deputy Director or designee will be responsible for seeing that the correct administrative controls are chosen, implemented and maintained effectiveness in order to minimize or eliminate employee exposure to COVID-19.

Examples of administrative controls for COVID-19 in medium risk groups include:

❖ Consider offering face masks to ill employees and visitors to contain respiratory secretions until they are able leave the workplace (i.e., for medical evaluation/care or to return home). In the event of a shortage of masks, a reusable face shield that can be decontaminated may be an acceptable method of protecting against droplet

- transmission. See CDC/NIOSH guidance for optimizing respirator supplies, which discusses the use of surgical masks, at <a href="https://www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy">www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy</a>.
- ★ Keep employees informed about <u>COVID-19 symptoms</u> and ask sick visitors to minimize contact with OCO staff until healthy again, such as by posting signs about COVID-19 where sick visitors may visit (e.g., conference rooms, training room, etc.)
- ❖ Where appropriate, limit visitor' and the public's access to the worksite or restrict access to only certain workplace areas.
- Consider strategies to minimize face-to-face contact (e.g., phone-based communication, telework).
- Communicate the availability of medical screening or other employee health resources (e.g., telemedicine services, etc.).

The following administrative controls have been established for OCO.

Position/Task	Administrative Controls		
	Employees will continue to work remotely until phase 6 of the Governor's safe return to work plan is reached.		
	<ol> <li>Communications will be provided to employees to stress the importance of social distancing, proper hygiene practices and to educate employees on policies, procedures, and protocols.</li> </ol>		
	3. Employees are required to self-monitor for <a href="COVID-19 signs and symptoms">COVID-19 signs and symptoms</a> prior to leaving for the workplace.		
	Employees with <u>COVID-19 symptoms</u> should stay home and request appropriate leave approval or lost time.		
	<ol> <li>Employees who do not pass the screening criteria will be instructed to not report to work and may use appropriate leave or lost time.</li> </ol>		
All Employees	<ol> <li>6. Employees who experience <u>COVID-19 symptoms</u> at work should notify the Director or Deputy Director immediately and will be sent home on appropriate leave or lost time. The Michigan Civil Service Commission (MCSC) has implemented leave policies that promote workers staying at home when they are sick, when household members are sick, or when required by a health care provider to isolate or quarantine themselves or a member of their household. Eligible employees have access to paid sick and annual leave and unpaid medical, parental, and FMLA leaves. Accommodations for workers with underlying medical conditions or who have household members with underlying health conditions can be requested to the HR office.</li> <li>7. Employees may be subject to a health screening consistent with the latest guidance from the <u>CDC</u> and <u>MDHHS</u> upon arrival at the workplace.</li> <li>8. Employees are also required to promptly report any signs and</li> </ol>		
	8. Employees are also required to promptly report any signs and symptoms of COVID-19 to their immediate supervisor before		

and during work via telephone, email or text.
Employees may be directed to wash or sanitize their hands     before coming to work, upon entering the building or regularly
throughout the workday.
10. Social distancing of 6' or more will be implemented and maintained where feasible and efficient.
11. Flexible work schedules will be considered if allowed by operational and budgetary considerations.
12. Microsoft Teams, email and telephones will be used when possible whether teleworking or in the office.
13. Use of conference rooms for meetings is discouraged or every other chair will be removed to ensure appropriate spacing between attendees.
14. Employees will be encouraged to eat at their desks or during times when break rooms are not busy.
15. Employee travel will be discouraged or conducted in separate cars if necessary.
16. Employees who have been exposed to a person with COVID-19 at the workplace and requiring quarantine shall be instructed by the Director, Deputy Director or designee as to next steps. The employee's health status, health information or COVID-19-related exposure information will be kept confidential to the extent possible.
17. Employee Work Area Responsibilities - Employees will wipe down work areas thoroughly at the beginning and end of each shift using the provided cleaning wipes. Areas to be cleaned include keyboards, counter tops, computer mice, laminated protocol reference sheets, door handles, restroom handles and critical surfaces, chair arm rests and any other relevant surfaces

# e) Hand Hygiene & Disinfection of Work Surfaces

The Director, Deputy Director or designee will be responsible for seeing 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 employee's hands are potentially exposed to COVID-19. When the provision of handwashing facilities is not feasible, the office shall provide employees with antiseptic hand sanitizers or towelettes.

that may have been exposed to the operator's germs.

Regular housekeeping practices are being implemented, including routine cleaning and disinfecting of work surfaces, equipment, tools and machinery, and other areas in the work environment to include but not limited to restrooms, breakrooms, conference/meeting rooms and training rooms.

Frequent cleaning and disinfecting will be conducted in high-touch areas such as phones, keyboards, touch screens, controls, door handles, elevator panels, railings, copy machines, etc. Building management will conduct cleaning during evenings consistent with CDC and MDHSS guidelines.

Special cleaning will occur to disinfect the workplace if an employee or visitor is symptomatic or diagnosed with COVID-19.

Appropriate and effective cleaning and disinfectant supplies have been purchased and are available for use in accordance with product labels, safety data sheets and manufacturer specifications and are being used with required personal protective equipment for the product. The maximum amount of fresh air is being brought into the workplace, air recirculation is being limited and ventilation systems are being properly used and maintained. Steps are also being taken to minimize air flow blowing across people.

Disinfecting wipes will be provided at multifunction copiers and other equipment used by multiple employees for disinfection between users.

## f) Personal Protective Equipment or Clothing

The Director, Deputy Director or designee will provide employees with personal protective equipment or clothing (PPE) for the protection from COVID-19 appropriate to the exposure risk associated with the job following the CDC and OSHA guidance and in accordance with the latest <a href="Coronavirus/COVID-19 Executive Orders">Coronavirus/COVID-19 Executive Orders</a>. All types of PPE are to be:

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

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

Positions/job/task	PPE
All OCO positions	None currently

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 the Romney Building or any SOM building or interacting with the public in the field.

All OCO employees will be provided two reusable nonmedical cloth face coverings and instructed on how to properly wash them. Employees may provide and use their own

masks if they are approved; 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.

Visitors to the OCO office will be provided a disposable mask.

## Insufficient face coverings:

- 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 when employees cannot consistently maintain 6' of separation from other individuals whenever in shared spaces (e.g., in-person meetings, hallways, restrooms, breakrooms, elevators, etc.). Employees who cannot consistently maintain 3' of separation from other individuals in the workplace should also consider wearing a face shield.

Please contact your Human Resources Director or the agency Safety Coordinator with any questions. Employees who are medically unable to wear a cloth face covering MUST contact the agency Reasonable Accommodation Coordinator to initiate the reasonable accommodation process. Reasonable accommodations are available to qualified applicants and employees with disabilities. Please contact the agency Reasonable Accommodation Coordinator with any questions.

## g) Health Surveillance

### 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.

#### Return to work health surveillance

Upon an employee's return to their 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, and submitting to a temperature reading.

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.

# h) Gatherings and Returns to the Workplace, & the related Authorization Process

Includes: Hosting an in-person event and attending an event hosted by an outside entity. Per the MIOSHA Emergency Rule 5.8, the OCO is prohibiting in-person work for employees to the extent their work activities can feasibly be completed remotely.

If a return to the office, in-person gatherings (e.g., conferences, meetings, trainings, testing, audits, inspections, etc.) are necessary, then the OCO Director will submit a written request to the OSE Director for approval. Requests will be comprehensive, submitted well in advance, and minimally include the following:

- When, where, the time and duration of the event.
- The total people, to include employees, expected to attend. Note: attendance should be limited to the extent possible, and gathering sizes must comply with the <u>DHHS Epidemic Order</u>; OSE may impose more stringent criteria.
- Whether the event will be held at a State of Michigan owned or operated location, or other venue to include the location name, address, telephone number, etc.
- Reason(s) why the event cannot be held remotely, importance of the testing, necessary to protect public health, etc.
- Is the event being held or attended pursuant to a statutory provision, enforcement action, permitting requirement, etc. and include a description.
- Whether the return to the workplace, meeting, training, examination, audit, fieldwork, investigation, etc. is required or critical to the agency's/department mission and the related consequences if the request is

- not approved.
- How employees will get to and from, to include number of occupants in a state vehicle, if appropriate.
- How the agency/department intends to keep employees and attendees safe (e.g., registration process, available sanitizers or related disinfecting procedures, post event cleaning procedures, enforcement of social distancing and face covering protocols, health screening protocols, what happens if someone becomes sick or experiences COVID-related symptoms, etc.).
- If the event if held outside the workplace (e.g., hotel, etc.), include confirmation that the venue is in compliance with applicable MIOSHA/DHHS Rules and related CDC guidance plus the total number of restrooms available, and how schedule breaks and lunches will be conducted to minimize gatherings, congregation, etc.
- Whether the Agency/Department Director is supportive of the request.
- Person(s) responsible for responding to all COVID-related situations and concerns, and how attendees contact that individual.

Note: an after-action review must also be provided to OSE upon conclusion of the event to include facts, practices that worked, lessons learned, etc.

## i) Training

The Director, Deputy Director or designee shall coordinate COVID-19 training and ensure compliance with all training requirements. Training shall minimally include but is not limited to:

- "COVID-19: Keeping You Safe at Work" training on the Civil Service Learning Management System. This training is in addition to a review of the agency/department plan and other new procedures and protocols.
- Routes by which the virus causing COVID-19 is transmitted from person to person.
- ❖ Distance that the virus can travel in the air, as well as the time it remains viable in the air and on environmental surfaces.
- Symptoms of COVID-19.
- Steps employees must take to notify their supervisor of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
- Measures that the building is taking and work rules employees must follow in order to prevent exposure to and spread of the virus (e.g., health screening protocol, isolation protocol, social distancing protocol, daily self-screening protocol, selfquarantining and return to work, visitors screening, etc.).
- ❖ The use of personal protective equipment if applicable to include the proper steps for putting it on and taking it off.
- Building/office signage.
- Resources available (e.g., Employee Service Program)

**NOTE**: It is recommended that records of employee training be maintained that at a minimum document the name(s) of employee(s) trained, date of training, name of trainer and content of training.

## j) Recordkeeping

The Director, Deputy Director or designee shall coordinate COVID-19 required recordkeeping and ensure compliance with the latest <u>Coronavirus/COVID-19 Executive</u> <u>Orders</u> and the <u>MIOSHA Emergency Rule</u>. The following records are required to be maintained:

- COVID-19 employee training records.
- Health surveillance records.
- \* Records of required notifications for one (1) year from the date of generation.

# k) Safe Start Team, the Return to Work Task Force and the Business Recovery/Quality Assurance Teams

In accordance with the State of Michigan's Safely Returning Employees to the Workplace, the OCO Safe Start Team, the Return to Work Task Force and the Business Recovery/Quality Assurance Teams shall minimally be comprised of the Director, and Deputy Director. Other OCO employees may be assigned to the special roles.

These teams will be responsible for establishing and implementing return to workplace goals, periodically reviewing the OCO COVID-19 Preparedness & Response Plan and to identify 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.

### i) Resources, Websites and Contacts

- State of Michigan Executive Orders & Directives
- State of Michigan Agency/Department Return to Work Plans
- ❖ Employee Service Program/ESP: Confidential program to assist employees with personal and work-related concerns. <a href="www.mi.gov/esp">www.mi.gov/esp</a>, 800-521-1377, or <a href="mailto:MCSC-ESP@mi.gov">MCSC-ESP@mi.gov</a>
- ❖ DHHS Epidemic Orders
- ❖ Michigan.gov/coronavirus
- ❖ MIOSHA COVID-19 Resources
- MIOSHA Emergency Rules
- ❖ MIOSHA General Industry Safety & Health Standards
- **CDC**
- OSHA COVID-19 Resources

- I) Addendums:
  - a. Certification of Readiness

  - b. Supervisor Checklistc. Health Screening Forms



# **Certification of Readiness to Return Employees to the Workplace**

Agencies must implement the following items to ensure they are ready to recall their priority services and employees to the workplace.

- My agency has identified priority services operations (prioritized, operational requirements enumerated, cost and revenue considered). This includes identifying the percentage or number of employees:
  - Required to work on premises.
  - Who will remain remote on a short-term, medium-term, and long-term basis.
- My agency has social distancing plans in place for work areas, elevators, meeting rooms, and common spaces.
- My agency has a plan to conduct <u>health screenings</u> for all employees and may do so for all vendors, contractors, and visitors. (Some facilities may require bodytemperature screenings.)
- My agency has communicated <u>infection control protocols</u>, including <u>handwashing</u>, health screening, temperature taking, face covering wearing, and <u>respiratory etiquette</u>, to anyone who is in the workplace.
- My agency has plans in place for telework, flextime, and staggered schedules in areas where social distancing is not possible.
- My agency has communicated travel restrictions and policies for remote meetings.
- My agency has consulted with facilities management, the DTMB, or the landlord to ensure extra cleaning and sanitizing schedules, needed layout changes, etc.
- My agency has appropriate and sufficient signage posted denoting social distancing requirements, hygiene reminders, restrictions on public access, required conference room seating, maximum number of people allowed in each space, what to do if employees become ill, etc.

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- My agency has made cleaning and disinfecting supplies available for employees to maintain their workspaces and equipment, along with adequate hygienic products such as soap, towels, and tissues.
- My agency has a process for employees and supervisors to report, inventory, and sanitize all state-owned equipment and office furniture removed from the agency and subsequently returned.
- My agency has employee communication plans that include notifying employees of information needed BEFORE they return to the site.
- My agency has notified all employees how to contact the <u>Employee Service Program (ESP)</u> if necessary.
- My agency has mechanisms in place to report and resolve compliance issues with safety protocols. These mechanisms are widely known to <u>employees</u>, either through signage or frequent verbal or written communication.
- My agency has protocols in place and an appropriate space set aside to isolate anyone who becomes ill with COVID-19 symptoms while working.
- If applicable, my agency has the necessary Personal Protective Equipment (PPE) on handto distribute to employees when necessary.
- I certify my agency has protocols in place to comply with executive orders allowing the safe return of employees to the workplace. By signing this certification, I attest my agency has followed all applicable guidance in this document, and has communicated or will communicate all relevant standards and policies to employees before they return or immediately as they return to the workplace.

AGENCY DIR	ECTOR SIGNATURE	A. C.	
DATE	November 6, 2020		



# SELF-IMPLEMENTED HEALTH SCREENING TEMPLATE

Note: This template has self-implemented questions to be used by employees each day prior to entering the workplace. Each employee shall work with their supervisor to establish a log to track those days they are in the workplace (aka building or going into the field).

Health Screening Questions				
			YES	NO
1) In the past 14 days, have you or a family member	r been di	agnosed with COVID-19?		
If the employee answers "YES", stay home and talk	to your s	upervisor.		
2) Do you have any newly developed or worsening	sympton	ns? Check all that apply.		
One of these symptoms	OR	Two of these symptor	ns	
<ul> <li>□ Shortness of breath</li> <li>□ Cough</li> <li>□ Difficulty breathing</li> <li>□ Loss of smell</li> <li>□ Loss of taste</li> </ul>		☐ Feverish ☐ Nausea or ☐ Chills ☐ Diarrhea ☐ Muscle aches ☐ Fatigue ☐ Headache ☐ Congestion ☐ Sore throat	C	nose
If an employee selects any <b>one</b> of these symptoms, stay home and talk to your supervisor.  OR  If an employee selects any <b>two</b> of these symptoms, stay home and talk to your supervisor.			oms,	
Measurement of Temperature				
			YES	NO
3) Is your body temperature above 100.4 °F?				
If the employee answers "YES", stay home and talk to your supervisor.				

Revised: 8/11/2020



# **Return to Workplace Checklist**

Supervisors must have each employee complete the following form prior to the employee returning back to the workplace or field. You must review your workplace specific protocols with your employees before they sign this form.

Welcome ba	ck! We	are glad	you	are	here.
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Е	mployee Name and ID	
	upervisor/Manager	
	State Property  Please indicate any of the fo	g keys asing card
		please specify)
	☐ Yes ☐ No ☐ N/A - Not	· · · · · · · · · · · · · · · · · · ·
		pment marked above has been cleaned and sanitized
В.	Communications	
	<ul> <li>□ Remove any modified set</li> <li>□ Remove any modified set</li> <li>□ My supervisor and I have hygiene, cleaning, cloth for</li> </ul>	rvice message on your voicemail and record a new personal greeting. rvices delivery message on your internal and external email. discussed, and I understand expectations for social distancing, hand ace coverings, and other protocols to reduce the spread of COVID- ed to stay home if I am sick.
C.		ining for State of Michigan Employees presentation from the Office aderstand the information within.
I VI TO	ERIFY I HAVE REVIEWED M WORKPLACE PLAN AND U	ETE A DAILY HEALTH SCREENING TO BEGIN MY WORKDAY.  IY WORKPLACE'S EXPOSURE CONTROL PLAN AND RETURN  INDERSTAND THE EXPECTATIONS FOR PERFORMING MY  DER NEW COVID-19 PREPAREDNESS PROTOCOLS.
Em	ployee Signature	DATE