



# COVID-19 Preparedness & Response Plan

## General

The Department of Insurance Services (DIFS) has developed this **CO**rona**VI**rus **D**isease **2019** (COVID-19) Preparedness & Response Plan in accordance with the [Centers for Disease Control and Prevention's \(CDC\)](#) latest guidance and the [MIOSHA General Duty Clause](#), which requires the employer to furnish each employee with “a place of employment that is free from recognized hazards.....”.

The purpose of this plan is to eliminate or minimize potential exposure to and the transmission of COVID-19 in the workplace. All employees are responsible for complying with all applicable aspects of this plan. This written plan is available to all employees via the intranet and upon request. Questions about this plan should be directed to [Lori May](#), DIFS Human Resources Director and Agency Safety Coordinator.

## Exposure Determination

DIFS has evaluated routine and reasonably anticipated tasks and procedures for all employees to determine whether there is actual or reasonably anticipated employee exposure to COVID-19. DIFS has determined that all office positions, jobs, or tasks fall into the medium or lower (caution) exposure risk levels. This determination is consistent with the U.S. Department of Labor’s Occupational Safety and Health Administration (OSHA) [Hazard Recognition/Clarifying Risk of Worker Exposure to COVID-19](#).

**Medium Exposure Risk:** Jobs that require either frequent close contact (within 6 feet for a total of 15 minutes or more over a 24-hour period) or sustained close contact with other people in areas with community transmission. *Because any given person may be an asymptomatic carrier, an employee’s exposure risk may increase when they have repeated, prolonged contact with other people in these situations, particularly where physical distancing and other infection prevention measures may not be possible or are not robustly implemented and consistently followed.*

**Lower (caution) Exposure Risk:** Jobs that do not require close contact (within 6 feet for a total of 15 minutes or more over a 24-hour period) with other people. Employees in this category have minimal occupational contact with the public and other coworkers.

Positions/Job/Task	Exposure Determination	Qualifying Factors
Office Workers & Traveling Field Staff	Medium or Lower	Office workers meeting face-to-face with co-workers or clients
Remote Workers & Independent Office Workers	Lower	Office workers working independently, remote workers with no contact to other employees

Per the CDC [Interim Public Health Recommendations/Guiding Principles](#), indoor and outdoor activities pose a minimal or lower (caution) risk to fully vaccinated people. Additionally, fully vaccinated people have a reduced risk of transmitting COVID-19 to unvaccinated people. In general, employees are considered fully vaccinated:

- 2 weeks after their second dose in a 2-dose series, such as the Pfizer or Moderna vaccines, or
- 2 weeks after a single-dose vaccine, such as Johnson & Johnson’s Janssen vaccine

Employees who do not meet these requirements are NOT fully vaccinated and are encouraged to keep taking all precautions until they are fully vaccinated.

### Engineering Controls

DIFS has implemented feasible engineering controls to minimize or eliminate employee exposure to COVID-19. Engineering controls involve isolating employees from work-related hazards using ventilation and other engineered solutions (e.g., restrict office access, situate employees at least 6’ apart with their computers facing inward and away from cubicle doors or aiseways, use of high cubicle walls/panels or other barriers, enclosed offices, etc.).

### Administrative Controls

Administrative controls are workplace policies, procedures and practices that minimize or eliminate employee exposure to the hazard. The following administrative controls have been established for DIFS.

Position/Task	Administrative Controls
<p style="text-align: center;"><b>All Employees</b></p>	<p>1. Employees are required to self-monitor for <a href="#">COVID-19 signs and symptoms</a> prior to leaving for the workplace.</p>
	<p>2. Employees with <a href="#">COVID-19 symptoms</a> should stay home and contact their supervisor to request appropriate leave approval or lost time.</p>
	<p>3. Employees who do not pass the screening criteria will be instructed to contact their supervisor, not report to work, and may use appropriate leave credits or lost time. Employees who don’t pass the screening criteria due to a positive COVID-19 test or exposure should contact their Human Resources Director.</p>
	<p>4. Employees who experience <a href="#">COVID-19 symptoms</a> at work should notify their supervisor immediately and will not be permitted to stay at work. The Michigan Civil Service Commission (MCSC) and collective bargaining agreements have leave policies in place</p>

	<p>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, and FMLA leaves.</p>
	<p>5. Employees are subject to a health screening consistent with the latest guidance from the <a href="#">CDC</a> upon arrival at the workplace.</p>
	<p>6. Employees are required to promptly report any signs and symptoms of COVID-19 during work to the Human Resources Director and their supervisor.</p>
	<p>7. Employees are encouraged to wash or sanitize their hands before coming to work, upon entering the building and regularly throughout the workday.</p>
	<p>8. Social distancing will be implemented and maintained where feasible and efficient.</p> <p>Social distancing, also called “physical distancing”, means keeping a safe space between yourself and other people who are not from your household. To practice social or physical distancing, stay at least 6 feet away (about 2 arm lengths) from others in indoor spaces when possible. Social distancing should be practiced in combination with other everyday preventive actions to reduce the spread of COVID-19, including wearing approved face coverings, avoiding the touching your face with unwashed hands, and frequently washing your hands with soap and water for at least 20 seconds.</p>
	<p>9. Flexible/alternate work schedules, remote work, or a combination of remote work/in-office work may be considered on a case-by-case basis. These options are neither a benefit nor an entitlement; they are subject to agency business/operational needs and may be ended by the Director or Human Resources Director anytime for any reason.</p>
	<p>10. Use of videoconferencing or teleconferencing for meetings and gatherings will be considered regardless of teleworking or being in the office.</p>
	<p>11. Conference rooms and the training room will be arranged to ensure appropriate spacing between tables and chairs, attendees etc.</p>
	<p>12. Employees will be encouraged to use break rooms during non-busy times while maintaining social distancing or use outdoor seating areas during lunches, breaks, etc.</p>
	<p>13. Employees who have been exposed to a person with COVID-19 at the workplace and requiring quarantine will be instructed by the Human Resources Director 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.</p>

## **Hand Hygiene and Disinfection of Work Surfaces**

Frequent handwashing is one of the best ways employees can protect themselves from getting sick. To prevent the spread of germs during the COVID-19 pandemic, employees should wash their hands with soap and water for at least 20 seconds or use a hand sanitizer with at least 60% alcohol to clean hands BEFORE and AFTER:

- Blowing your nose, coughing, or sneezing.
- Entering and leaving a public place or work area.
- Preparing or eating food.
- Touching a potentially contaminated surface or object, such as a door handle, table, etc.
- Touching garbage.
- Touching your eyes, nose, and mouth with unwashed hands.
- Touching your face covering.
- Using the restroom.

When the provision of handwashing facilities is not feasible, DIFS will provide employees with antiseptic hand sanitizers or towelettes.

The virus that causes COVID-19 can land on work surfaces. While the risk of infection from touching a surface is low, regular housekeeping practices have been implemented for the routine cleaning and disinfecting of elevators, restrooms, breakrooms, conference/meeting rooms, training rooms, doorknobs, and other high touch areas.

CDC guidance will be followed for special cleaning and disinfecting when someone in the office or when someone visited the office has tested positive for 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.

Please refer to the Department of Technology, Management and Budget/[DTMB Return to Office Plan, State Workplace Guidelines](#) for any additional cleaning and disinfection criteria.

## **Face Coverings and Other Personal Protective Equipment**

DIFS employees are required to use face coverings, but additional Personal Protective Equipment (PPE) is not required. If PPE becomes required, DIFS will provide employees with the appropriate equipment or clothing for the protection from COVID-19 appropriate to the exposure risk associated with the job following the CDC and OSHA guidance. 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 DIFS positions	DIFS office work does not require PPE use

For the purposes of this plan, a nonmedical cloth face covering is NOT considered PPE. All employees are required to wear a nonmedical cloth face covering while indoors at a state facility, in a state vehicle with other passengers, or when required by DIFS policy. Additional face covering requirements may apply for work-related carpool/rideshare or travel. *Indoors includes, but is not limited to bathrooms, breakrooms/kitchens, conference rooms, corridors at the entrance to a building (or waiting to enter a facility), cubicles, elevators, hallways, offices, stairwells, training rooms, etc.).*

**Note:** Some exceptions may apply; exceptions are NOT automatic. Reasonable accommodations may be available to qualified applicants and employees with disabilities. Employees requesting an exception MUST contact the [Agency ADA Title I Reasonable Accommodation Coordinator](#) to initiate the reasonable accommodation/disability accommodation process.

All DIFS employees have been provided with one reusable nonmedical cloth face covering and have access to disposable face coverings while in the office. Masks are also available up on request for travel. Staff have been provided basic instruction or training on how to wear, maintain, and/or clean 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.

Face coverings or masks that do not completely cover the nose, mouth, or chin, or that incorporate exhalation valves or vents are not permitted. Other types of unacceptable face coverings include those with large gaps; are too loose or are too tight; loosely

woven, knitted, or fabrics that let light pass through; open-chin bandanas; scarf/ski mask-style coverings; single layer coverings; and those that are hard to breathe through (e.g., plastic, leather).

The CDC does NOT recommend the use of N95 respirators for the protection against COVID-19 in office environments, as these respirators are critical supplies that should be prioritized for healthcare workers and other medical first responders to prevent supply shortages. The CDC also does not recommend using face shields or goggles as a substitute for face coverings. If face shields are worn, they should be in addition to the face covering. Face shields should wrap around the sides of your face and extend below your chin or be hooded (fully enclosed and dropping below your chin).

DIFS will maintain a sufficient supply of face coverings in the event an employee forgets theirs or an employee's face covering becomes soiled or wet/saturated at work. Please contact [Lori May](#), DIFS Human Resources Director and Agency Safety Coordinator with any questions.

## **Carpool and Rideshares**

The following protective measures are required whenever two or more persons share either a state vehicle or personal vehicle for work purposes:

- Stay home when sick.
- Proper wearing of approved face coverings are required in the vehicle regardless of vaccination status.
- Limit the number of occupants. For example, a car may allow for a driver plus another individual who sits in the rear seat on passenger side of the car. A 12–15-person van might accommodate 4-5 persons (e.g., driver, 1<sup>st</sup> row passenger side, 2<sup>nd</sup> row driver side, 3<sup>rd</sup> row passenger side, etc.).
- Increase the fresh air intake via the vents or by slightly opening the windows.
- Clean and disinfect frequently touched surfaces in the vehicle at the beginning and end of each shift, and after an occupant becomes sick.
- Social distance when outside of the vehicle.

## **Travel**

All international business travel must be approved by the Office of the State Employer (OSE). Requests are to be submitted through the completion of an [online form](#) and will be considered on a case-by-case basis. OSE determinations or requests for additional information will be returned to the individual submitting the online form. A separate request must be submitted for each employee traveling.

To maximize employee protections and potentially prevent the spreading of COVID-19 to others, all persons traveling on behalf of DIFS will follow the latest CDC guidance for domestic and international business travel.

All domestic and international business travel should be delayed until employees are fully vaccinated.

### **Feeling Sick and Sick Employees**

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 the Human Resources Director and their immediate supervisor 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 the Human Resources Director, who will follow-up with building management if appropriate.

### **Daily Health Screenings/Health Surveillance**

All employees, contractors, interns, or other persons conducting work on behalf of DIFS will be required to participate in daily health screenings upon their return to the workplace. These health screenings are comprised of COVID-related questions about symptoms and suspected or confirmed exposure to people with possible COVID-19.

These health screenings can occur through one or more ways (e.g., paper questionnaire, COVID screening app using a state-issued electronic device, [web-based questionnaire](#) using a personal or state-issued cell phone, or by an employee swiping their employee identification badge/access card to enter restricted areas such as parking lots, buildings, rooms, locked storage areas, etc.).

**Note:** each time an employee logs onto a state-provided electronic device or swipes their identification/badge to access a secure site or area the person affirms they are symptom-free and feeling well.

Persons exhibiting signs of illness will not be permitted into the building.

### **Close Contacts and When to Quarantine**

Employees who are not fully vaccinated should quarantine if they have been in close contact (within 6 feet of someone for a cumulative total of 15 minutes or more over a 24-

hour period) with someone who has COVID-19. Quarantine is about keeping employees who might have been exposed to COVID-19 away from others. Report COVID-19 exposure(s) to the Human Resources Director and follow their instructions.

Employees who are fully vaccinated do NOT need to quarantine after contact with someone who had COVID-19 unless they have symptoms. However, fully vaccinated people should get tested 3-5 days after their exposure, even if they don't have symptoms and wear a cloth face covering indoors in public for 14 days following exposure or until their test result is negative.

Local public health authorities often determine and establish the quarantine options for their jurisdictions. Please contact the Human Resources Director with any questions.

## **Training**

All employees, contractors, interns, or other persons conducting work on behalf of the DIFS must successfully complete the OSE's "COVID-19: Keeping You Safe at Work" training, which can be found out on the [State of Michigan Learning Center](#). This training is in addition to any building-specific training needed to ensure compliance with applicable training requirements and/or COVID-related best practices. Training shall minimally include but is not limited to:

- ❖ Routes by which the virus causing COVID-19 is spread.
- ❖ Symptoms of a COVID-19 infection.
- ❖ Steps employees must take if they have a fever, cough or other symptoms, or believe they might have COVID-19 (e.g., stay home; call their immediate supervisor and healthcare provider; notify their Human Resources Director if the employee, a family member, or someone the employee lives with tests positive for COVID-19 so the agency can contact trace and monitor others with whom the employee had been in close contact while at work; etc.).
- ❖ The risk of a COVID-19 exposure.
- ❖ Measures that the building has taken, and work rules employees must follow to prevent exposure (e.g., social distancing, hand hygiene, routine cleaning, and disinfection, use of cloth face coverings and other personal protective equipment, travel restrictions, daily health screenings, close contact and when to quarantine, building signage, etc.).
- ❖ Who to contact and what to do if medically unable to wear a cloth face covering.
- ❖ Resources available (e.g., Employee Service Program).

**NOTE:** It is recommended that employee training records minimally contain the name(s) of employee(s) trained, date of training, name of trainer and content of training.



## **Recordkeeping**

All DIFS COVID-19 related records (e.g., health screenings, training records, etc.) will be kept in accordance with applicable DIFS record retention requirements.

All DIFS work-related records and COVID-19 exposures will be reported and recorded as required by MIOSHA Standard [Part 11: Recording and Reporting of Occupational Injuries and Illnesses](#). For more information, refer to [OSHA's Revised Enforcement Guidance for COVID-19 cases](#).

## **COVID-19 Safe Start Team**

DIFS COVID-19 Safe Start Team shall minimally be comprised of the following individuals:

- Anita Fox, Director
- Karin Gyger, Chief of Staff and Legislative Director
- Bob Burns, Chief Advisor to the Director
- Penny Wright, Financial and Administrative Services Director and Chief Financial Officer
- Lori May, Human Resources Director and Safety Coordinator

Other DIFS employees may be assigned special duties on a case-by-case basis.

This team will be responsible for establishing and implementing return to workplace goals, reviewing and updating DIFS COVID-19 Preparedness & Response Plan, and identifying best practices and improvement needs stemming from agency communications, engineering and administrative work practice controls, and protective measures used during the pandemic.

## **COVID-19 Safety Coordinator(s)**

[Lori May](#) will serve as DIFS COVID-19 Safety Coordinator.

The COVID-19 Safety Coordinator will monitor or report on implemented COVID-19 control strategies required for the workplace as needed or requested.

## **Support and Resources**

Employees having difficulty transitioning back to in-person office work or who are experiencing other personal or professional challenges are encouraged to access resources provided by the [Employee Service Program \(ESP\)](#) website or contact ESP at

800-521-1377 or [MCSC-ESP@mi.gov](mailto:MCSC-ESP@mi.gov). Additional health and safety-related resources can be found below:

- [State of Michigan Agency/Department Return to Work Plans](#)
- [CDC COVID-19 Resources](#) (e.g., vaccines, boosters, possible side effects, etc.)
- [Michigan.gov/coronavirus](#) (e.g., emergency rules, epidemic orders, etc.)
- [MIOSHA COVID-19 Resources](#) (e.g., workplace safety documents, emergency rules, etc.)
- [MIOSHA General Industry Safety & Health Standards](#)
- [OSHA COVID-19 Resources](#) (e.g., requirements, guidance, tools, etc.)
- Any applicable [State of Michigan Executive Orders & Directives](#)

### **Miscellaneous**

Please refer to the [DTMB Return to Office Plan, State Workplace Guidelines](#) for any additional requirements.