



# Michigan Department of Labor and Economic Opportunity

## Wage and Hour Division

### SARS-CoV-2 Preparedness & Response Plan for Low & Medium Risk Employees

#### General

The following COVID-19 Preparedness & Response Plan has been established for the **Wage and Hour Division** in accordance with the Governor's latest [Executive Directives](#), [MIOSHA Emergency Rules](#), [DHHS Epidemic Orders](#), and [CDC guidance](#). This plan shall minimally be made available to employees via the LEO Wage and Hour's intranet and upon request. This plan 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.

This plan and the LEO Return to Work Plan will be made readily available to our employees and can be found via this link: <https://www.michigan.gov/ose/0,4656,7-143--533755--U,00.html>.

The Safe Start Team/Return to Work Task Force/Business Recovery/Quality Assurance Team is made up of the following employees which will periodically review and update the plan:

- Jennifer Fields, Division Manager
- Randall Harrison, Regulation Agent
- Tara Bride, Regulation Agent
- Edgar Rainey, Regulation Agent

#### Exposure Determination

Jennifer Fields will evaluate 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. Jennifer Fields will be responsible for seeing that exposure determination is performed.

All travel requests must be submitted to OHR and approved by OSE.

LEO Wage & Hour has categorized 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 (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. In areas without ongoing community transmission, workers in this risk group may have frequent contact with travelers who may return from locations with widespread SARS-CoV-2 transmission. In areas where there is ongoing community transmission, workers in this category may have contact with the general public and coworkers (for example, schools, high-population-density work environments, high-volume retail settings).

The Wage and Hour Division has determined that the following positions/jobs/tasks have been determined to have the following exposure determination(s).

(NOTE: Some employers may have more than one type of exposure determination in the workplace depending on the evaluation of each positions/jobs/tasks in the workplace. Likewise, employees may perform tasks that have differing exposure determinations depending on assignment or need.)

<b>Positions/job/task</b>	<b>Determination</b>	<b>Qualifying Factors (i.e. no public contact, public contact, job task description)</b>
Management Team	Low Risk	No Public Contact—appt only
Administrative Support	Low Risk	No Public Contact—appt only
Regulation Agents	Medium Risk	Off Site Public Contact by Appt only/Currently on hold until field contact safety plan is approved by OSE and staff is trained and provided with PPE.

## **Engineering controls**

Wage and Hour has implemented feasible engineering controls to prevent employee exposure to SARS-CoV-2. 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 SARS-CoV-2 include:

- Installing physical barriers, such as clear plastic sneeze guards.
- Installing a drive-through window for customer service.

NOTE: Additional engineering controls are not recommended for low exposure risk employees. \_ will be responsible for seeing 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. (Example: specify the engineering control for each of the positions/job/task listed in the exposure determination, and how each engineering control is intended to function to prevent the spread of SARS-CoV-2.)

<b>Positions/job/task</b>	<b>Engineering Control</b>
Management Team	Separate offices – 6ft Social Distancing/home offices
Administrative Support	Work Cubicles with 6ft social distancing
Regulation Agents	Remote with limited office appearance/home offices

### **Administrative Controls**

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. Jennifer Fields will be responsible for seeing that the correct administrative controls are chosen, implemented and maintained effectiveness to minimize or eliminate employee exposure to SARS-CoV-2.

Additional engineering controls are not recommended for workers in the lower exposure risk group. Low exposure risk group employers should public health communications about COVID-19 recommendations and ensure that workers have access to that information. Frequently check the CDC COVID-19 website: [www.cdc.gov/coronavirus/2019-ncov](http://www.cdc.gov/coronavirus/2019-ncov).

Examples of administrative controls for SARS-CoV-2 in medium risk groups include:

- Consider offering face masks to ill employees and customers 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: [www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy](http://www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy).



- Keep customers informed about symptoms of COVID-19 and ask sick customers to minimize contact with workers until healthy again, such as by posting signs about COVID-19 in stores where sick customers may visit (e.g., pharmacies) or including COVID-19 information in automated messages sent when prescriptions are ready for pick up.
- Where appropriate, limit customers’ 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., drive-through windows, phone-based communication, telework).
- Communicate the availability of medical screening or other worker health resources (e.g., on-site nurse; telemedicine services).

The following administrative controls have been established for the Wage and Hour Division. (Example: specify the Administrative control for each of the positions/job/task listed in the exposure determination, and how each engineering control is intended to function to prevent the spread of SARS-CoV-2.)

Positions/job/task	Administrative Control Type (workplace distancing, remote work, notifying customers)
All Office staff	Rotating remote and office with 6ft+ social distancing workspaces (offices and cubicles)
	(1-5 persons in office at one time) No public access except by appt only

## Hand Hygiene & Disinfection of Environmental Surfaces

Jennifer Fields 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 SARS-CoV2-19. When provision of handwashing facilities is not feasible, the employer shall provide employees with antiseptic hand sanitizers or towelettes.

Jennifer Fields will be responsible for seeing that environmental surface 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-CoV2-19. When choosing cleaning chemicals, Jennifer Fields 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.



An enhanced cleaning and disinfection shall be performed after persons suspected or confirmed to have SARS-CoV-2 have been in the workplace. Jennifer Fields will be responsible for seeing that such a cleaning and disinfection is performed as required.

The following is a list of environmental surfaces, methods used to disinfect, and the frequency of such disinfection:

Surface	Method/Disinfectant Used	Schedule/Frequency
Shared scanner/printer	75% alcohol Wipes	After each use

The following methods will be used for enhanced cleaning and disinfection:

### **Personal Protective Equipment (PPE)**

Wage and Hour Division will provide employees with personal protective equipment for protection from SARS-CoV-2 appropriate to the exposure risk associated with the job. The employer must follow the current and applicable 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 when required.
- 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.
- Require masks to be worn when workers cannot consistently maintain six feet of separation from other individuals in the workplace and consider face shields when workers cannot consistently maintain three feet of separation from other individuals in the workplace.

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 Mason Building, 530 West Allegan, Lansing MI. All Wage and Hour 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 Mason Building, 530 West Allegan, Lansing MI will be provided a disposable mask. 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.

The construction industry must provide specific instructions for the distribution of personal protective equipment and designate on-site locations for soiled masks.

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

Positions/job/task	PPE
All Staff	<ul style="list-style-type: none"> <li>Self- provided face coverings or masks, Neck gaiters, face coverings with valves, and open chin bandanas are not acceptable.</li> </ul>
Office Staff	Sanitizers, Gloves and Wipes

## Health Surveillance

Wage and Hour has implemented a screening protocol to identify known or suspected cases of COVID-19 among employees and isolate them from the remainder of the workforce. Jennifer Fields will be responsible for ensuring that all required health surveillance provisions are performed as required.

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.

At the beginning of each day at the start of each work shift Wage & Hour will screen employees for signs and symptoms COVID-19 as required. Employees have been directed to promptly report any signs and symptoms of COVID-19 to Jennifer Fields, Division Manager, before and during the work shift and have provided employees with instructions for how to make such a report to the employer.

Manufacturing facilities must also conduct a daily entry screening protocol for workers, contractors, suppliers, and any other individuals entering the facility, including a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19, together with temperature screening as soon as no-touch thermometers can be obtained.

Businesses or operations in the construction industry must also: Conduct a daily entry screening protocol for workers, contractors, suppliers, and any other individuals entering a worksite, including a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19, together with, if possible, a temperature screening.

The Wage and Hour Division 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.

## **Feeling Sick / 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.



Employees have been directed to promptly report any signs and symptoms of COVID-19 to management before and during the work shift. Wage and Hour will provide employees with instructions for how to make such a report to the employer.

## **Gatherings and Returns to the Workplace & 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 employer shall create a policy 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 agency/department must submit a written request to the OSE Director for approval. Requests should 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 [DHHS Epidemic Order](#); OSE may impose more stringent criteria.
- Whether the event will be held at a State of Michigan owned or operated location, or other venues 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 is 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.

## **Training**

Jennifer Fields shall coordinate SARS-CoV2 training and ensure compliance with all training requirements. All agency employees will participate in mandatory OSE-provided “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. Note: the OSE-provided training is intended to be completed just prior to an employee’s return to their pre-COVID assigned workplace to ensure they receive the latest information and guidance.

Wage and Hour will train workers on, at a minimum:

- 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 the worker must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
- Measures that the facility is taking to prevent worker exposure to the virus, as described in the COVID-19 preparedness and response plan required under section 11(a) of this order.
- Rules that the worker must follow to prevent exposure to and spread of the virus.
- The use of personal protective equipment, including the proper steps for putting it on and taking it off.

Wage and Hour shall create a record of the training. Records should include the name of the employee trained and the date of training.



## Recordkeeping

Jennifer Fields shall coordinate SARS-CoV2 required recordkeeping and ensure compliance with the following requirements:

- Required training.
- 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.
- When an employee is identified with a confirmed case of COVID-19.

Jennifer Fields will ensure compliance with all such requirements as specified in the latest COVID-19 in accordance with the requirements in the latest COVID-19 DHHS and MIOSHA Orders and all applicable directives, orders and guidelines. All COVID-19 employee training records, health surveillance records, and records of required notifications are required to be maintained for one (1) year from the date of generation.

## Resources, Websites and Contracts

- [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 [www.mi.gov/esp](http://www.mi.gov/esp), 800-521-1377, or [MCSC-ESP@mi.gov](mailto:MCSC-ESP@mi.gov)
- [DHHS Epidemic Orders](#)
- [Michigan.gov/coronavirus](http://Michigan.gov/coronavirus)
- [MIOSHA COVID-19 Resources](#)
- [MIOSHA Emergency Rules](#)
- [MIOSHA General Industry Safety & Health Standards](#)
- [OSHA COVID-19 Resources](#)