



MICHIGAN DEPARTMENT OF
**LABOR & ECONOMIC
OPPORTUNITY**

LEO Return to Work Framework

June 2020

Version November 9, 2020

Introduction

This plan in conjunction with the guidance and requirements of the Governor and other regulatory State agencies is intended to provide the high-level framework of expectations for the Department of Labor and Economic Opportunity (LEO) agencies.

Agency level plans should incorporate these expectations as well as additional information or planning as required by Executive Directives, MIOSHA emergency rules, OSE, DHHS Epidemic Orders and other relevant points.

Each Agency, Bureau, or Division will need to create a plan for their location. References to “managers,” is intended to apply to whomever will be tasked with approval at the appropriate level.

LEO Exposure Control Plan

The following framework is to be applied across all Agencies, Bureau’s, and Departments. In addition, these departments must complete a supplemental plan that further identifies any specific operational needs.

General

The following COVID-19 Preparedness and Response Plan has been established for LEO Executive in accordance with the requirements in Executive Directives, MIOSHA’s Coronavirus Disease 2019 (COVID-19) Emergency Rules, DHHS Epidemic Orders, and CDC Guidance.

This plan will be available at each agency and posted on the intranet. The purpose of this plan is to minimize or eliminate employee exposure to SARS-CoV-2. A copy of this plan shall be provided to employees upon their request.

Priority Services to Return to Workplace

LEO 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.

Managers should identify critical services to open to the public as soon as appropriate safeguards are in place and can be maintained. Such services and plans must be submitted to OHR and approved by the Office of State Employer prior to implementation. Decisions about which

employees are returning to the workplace and which employees are continuing to work at home must be made based on legitimate business reasons.

Entities in leased facilities or facilities with multiple state agencies and operations should work with the lessor or DTMB facilities manager, coordinated through LEO facilities, on cross-agency collaboration.

Services to Remain Remote

LEO is committed to a phased return of employees to the workplace but for the foreseeable future employees whose job duties can be performed through telework should continue to telework. State and federal public health and other guidance and decrees will dictate the pace and scope of returning employees to the workplace. LEO agencies should anticipate the need to develop a strategy to incrementally increase occupancy of their facility consistent with operational needs. Those employees returning to their workplace must follow department and agency protocols developed for a safe return to work.

Prohibiting In-Person Work

LEO and all agencies and bureaus within LEO must prohibit employees from working in person to the extent feasible. Recognizing that some employees must report for in-person work, all the following must be applied within return to work plans:

- Managers must identify those positions that require in-person work within their return to work plans as well as define whether full-time or part-time in-person work is required. Sporadic needs to be in-person must be identified also.
- Managers must include the reason that the work must be performed in-person, e.g., database connectivity if VPN's are not possible, physical documents or other physical work, equipment needs, etc.
- Trainings must be conducted remotely. Exceptions may be made but a detailed request including why remote use will not work must be included, submitted to OHR and approved by the Office of State Employer.

Exposure Determination

Departments, Bureau's, and Agencies must 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. Each department will be responsible for seeing that exposure determination is performed.

Managers must 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 (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).

(NOTE: Some 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.)

The following are preliminary determinations as provided by the Departments:

Department	Determination	Notes
MIOSHA	Lower Risk	Remote Staff-Limited
MIOSHA	Medium Risk	Most staff-exposure from high density office space and field work
MIOSHA	High Risk	Field staff investigating hospitals or high risk environments-Limited
MIOSHA	Medium Risk	Consultants providing training at employer's worksite or co--sponsor's site.
MIOSHA	Medium Risk	Staff providing new hire training in low density office space
MSHDA	Lower Risk	90% of staff-remote or low density office
MSHDA	Medium Risk	Office exposure, limited field work, contact with incoming public
WDCA	Lower Risk	Okemos based workforce (majority), no frequent or close contact with public.

WDCA	Medium Risk	Hearing sites including Magistrates and Commissioners.
BER	Lower Risk	Labor Division and Admin Staff-low density, appointment only, no public contact
BER	Medium Risk	Labor mediators-offsite public interaction
Wage & Hour	Lower Risk	Management and administrative staff, no public contact, appointment only, medium density office
Wage & Hour	Medium Risk	Regulation agents through offsite public interaction.
E&T	Lower and Medium Risk	In process-covers 850 employees across 80 locations. Focusing on public facing.
LEO Executive	Lower Risk	
Communications	Lower Risk	
State Land Bank	Medium Risk	Regulation agents through offsite public interaction.
Legislative Affairs	Lower Risk	
Administrative Services	Lower Risk	
Office of Prosperity	Lower Risk	
Human Resources	Lower Risk	
UIA	Lower and Medium Risk	In process-covers 750 employees with some staffing public facing offices across the state

Engineering controls

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.

Departments will be responsible for identifying and requesting potential engineering controls. Primarily, these controls may be necessary for those workers identified in the medium risk category. Engineering controls are likely not required in low exposure risk categories but may be considered.

DTMB Buildings Operations in State owned buildings, or LEO facilities for leased spaces, will work with agencies to see that the correct engineering controls are chosen, installed and maintained and serviced for effectiveness as often as required.

Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. Departments 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 SARS-CoV-2.

Low exposure risk group departments should monitor 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.

The following administrative controls have been established for all LEO departments for office workers in locations that are not open to the public (open to the public does not include occasional appointments or visitors):

- Designate a COVID-19 safety coordinator for each one or more worksite to implement, monitor, and report on the COVID-19 control strategies.
- Establish policy prohibiting in-person work to the extent feasible.
- Assign dedicated entry point(s) for all employees to reduce congestion at main entrances.
- Provide visual indicators, such as tape markers of appropriate spacing for employees outside the building in case of congestion.
- To the extent necessary to avoid congestion, consider staggering start times, schedules, or other plans to accomplish this goal.
- Maintain 6 feet of social distancing between employees which may include spreading out workspaces, staggering use, restricting non-essential common spaces (e.g., cafeteria's, break rooms, etc.). including placing signs, ground markings, and physical barriers (where appropriate).
- Post signage about personal hygiene, handwashing, symptoms of COVID, notices to the public about symptoms of COVID (where appropriate) and other visual cues on appropriate

spacing, direction through buildings, etc.

- Provide disinfecting supplies and require employees to wipe down their workstations at least twice daily.
- Disinfect high touch surfaces frequently and minimize sharing of items when possible.
- Suspend all non-essential visitors.
- Restrict non-essential travel to areas outside of the opened “zone(s),” or other states. Any travel requests must be approved prior by the Office of State Employer.
- Provide cloth face coverings to all employees and require use by all employees when they are unable to maintain 6 feet of spacing from the public or co-workers, work within a space open to the public, or in shared spaces including during in-person meetings, in restrooms, hallways, etc. Employees may provide their own appropriate covering, neck “gators,” gaiters and bandanas are not acceptable under any circumstance.
- Require visitors or public entering to wear face covering.
- Prohibit in-person meetings or other events where social distancing cannot be maintained.

Hand Hygiene & Disinfection of Environmental Surfaces

Departments 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.

Departments will be responsible for seeing that environmental surface in the workplaces 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 consult information on Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens. Products with EPA-approved emerging viral pathogens claims are expected to be effective against SARS-CoV-2 based on data for harder to kill viruses. The manufacturer’s instructions for use of all cleaning and disinfection products will be strictly adhered to (e.g., concentration, application method and contact time, and personal protective equipment).

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

Personal Protective Equipment (PPE)

Departments must provide employees with personal protective equipment for protection from SARS-CoV-2 appropriate to the exposure risk associated with the job following the CDC, MIOSHA

and OSHA guidance applicable to the industry and types of jobs at the workplace.

Non-medical Face Coverings

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 MIOSHA emergency rules and CDC guidance.

All 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 building/location will be provided a disposable mask.

Prohibited 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.

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.

Health Surveillance

Departments must utilize the screening protocol to identify known or suspected cases of COVID-19 among employees and visitors and isolate them from the remainder of the workforce. Departments will be responsible for ensuring that all required health surveillance provisions are performed as required.

Employees must be directed to promptly report any signs and symptoms of COVID-19 to their supervisor during the work shift. Supervisors will provide employees with instructions for how to make such a report.

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.

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.

The specific instructions for employee reporting signs and symptoms of COVID-19 are as follows:

Departments 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:

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

Training

Departments shall coordinate SARS-CoV2 training and ensure compliance with all training requirements.

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.

Additional requirements: train workers on, at a minimum:

1. Routes by which the virus causing COVID-19 is transmitted from person to person.

2. Distance that the virus can travel in the air, as well as the time it remains viable in the air and on environmental surfaces.
3. Symptoms of COVID-19.
4. 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-19e
5. Measures that the facility is taking to prevent worker exposure to the virus, as described in the COVID-19 preparedness and response plan.
6. Rules that the worker must follow in order to prevent exposure to and spread of the virus.
7. The use of personal protective equipment, including the proper steps for putting it on and taking it off.

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.

Recordkeeping

Departments shall coordinate SARS-CoV2 required recordkeeping and ensure compliance with all such requirements as specified in the Governor’s Executive Orders requirements.

The following records are required to be maintained for 1 year from the time of generation:

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

The certifications on the remaining pages must be completed as part of the planning processes. There are also helpful links and other information to aid in this endeavor.

Completed plans must be submitted to me by _____.

 Susan Corbin
 Director of the Department of Labor and Economic Opportunity

 Date

Management Certifications

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 [health screenings](#) for all employees and may do so for all vendors, contractors, and visitors. (Some facilities may require body temperature screenings.)
- My agency has communicated [infection control protocols](#), including [handwashing](#), health screening, temperature taking, face covering wearing, and [respiratory etiquette](#), 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 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.
- 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 [Employee Service Program \(ESP\)](#) if necessary.
- My agency has mechanisms in place to report and resolve compliance issues with

safety protocols. These mechanisms are widely known to [employees](#), 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 hand to distribute to employees when necessary. PPE is to be obtained through the LEO Emergency Manager/SEOC.
- 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 DIRECTOR SIGNATURE _____

DATE _____

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 back! We are glad you are here.

Employee Name and ID	
Supervisor/Manager	

A. State Property

Please indicate any of the following state-owned equipment you are returning to the office

- Key card/security badges
- Mobile device (e.g. cellphone, notebook) asset #
- Laptop/desktop – asset #
- Computer Monitor
- USB flash drive
- Building keys
- Purchasing card
- Office Chair
- Other (please specify)

Yes No N/A - Not returning equipment

I verify the state-owned equipment marked above has been cleaned and sanitized according to [guidelines](#) and returned to my agency.

Specify:

B. Communications

- Remove any modified service message on your voicemail and record a new personal greeting.
- Remove any modified services delivery message on your internal and external email.
- My supervisor and I have discussed, and I understand expectations for social distancing, hand hygiene, cleaning, cloth face coverings, and other protocols to reduce the spread of COVID-19. I understand that I need to stay home if I am sick.

C. Training

- I reviewed COVID-19 Training for State of Michigan Employees presentation from the Office of the State Employer and understand the information within.

I VERIFY THAT I WILL COMPLETE A DAILY HEALTH SCREENING TO BEGIN MY WORKDAY. I VERIFY I HAVE REVIEWED MY WORKPLACE'S EXPOSURE CONTROL PLAN AND RETURN TO WORKPLACE PLAN AND UNDERSTAND THE EXPECTATIONS FOR PERFORMING MY JOB IN THE WORKPLACE UNDER NEW COVID-19 PREPAREDNESS PROTOCOLS.

Employee Signature _____ DATE _____

Supervisor Signature _____ DATE _____

Communications Resources

Key Messages

- We are glad to be working on getting our team back together! It has been a difficult time for everyone and each one of us has been affected by COVID-19.
- We will work together to create and maintain a safe and healthy work environment for ourselves and our customers.
- The “COVID-19 Preparedness Plan” is posted in the workplace and online for all employees to review.
- We will need to work together to develop a plan to manage the backlog of work and set expectations for both our customers and us. It may not be possible to clear out any backlog of work in one day but developing a strategy may assist with handling the workload.
- For us to meet our mission and be successful, we need the knowledge, expertise, and contributions of everybody on the team.
- If you find it difficult to move forward, the state [Employee Service Program \(ESP\)](#) is an excellent resource.
- We have done a good job of working together in the past. Our future success depends upon our ability to use our knowledge, creativity, flexibility and our willingness to help each other and serve Michigan.

Resources, Websites, and Contacts

General

- [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 ; 800-521-1377, or MCSC-ESP@mi.gov.
- [DHHS Epidemic Orders](#)
- [State of Michigan: Coronavirus Information](#)
- [MIOSHA COVID-19 Resources](#)
- [MIOSHA Emergency Rules](#)
- [MIOSHA General Industry Safety & Health Standards](#)
- [MIOSHA: COVID-19 Frequently Asked Questions](#)
- [MIOSHA: COVID-19 Interim Enforcement Plan](#)
- [State of Michigan: Guidance for Business](#)
- [State of Michigan: Guidance for Individuals](#)

- [AG's Guidance to Help Determine Whether a Worker is a "Critical Infrastructure Worker"](#)
- [OSHA: Coronavirus Resources](#)
- [OSHA: Guidance on Preparing Workplaces for COVID-19](#)
- [CDC: Coronavirus \(COVID-19\)](#)
- [CDC: Environmental Infection and Control Guidelines for Air Handling](#)
- [ASHRAE: Technical Resources for COVID-19 Preparedness](#)

Handwashing

- [CDC: Clean Hands Save Lives](#)
- [CDC: What You Need To Know About Handwashing](#)
- [CDC: When and How to Wash Your Hands](#)

Respiratory etiquette: Cover your cough or sneeze

- [CDC: How to Protect Yourself & Others](#)
- [CDC: Coughing and Sneezing](#)

Social distancing

- [CDC: Interim Guidance for Businesses and Employers to Plan and Respond to COVID-19](#)

Housekeeping

- [CDC: Cleaning and Disinfecting Your Facility](#)
- [CDC: Cleaning and Disinfection for Community Facilities](#)
- [CDC: Cleaning and Disinfecting Your Home](#)
- [EPA: Disinfectants to use against SARS and COVID-19](#)

Employees exhibiting signs and symptoms of COVID-19

- [CDC: What to Do If You Are Sick](#)

Training

- [MIOSHA: COVID-19 Guidance](#)
- [OSHA: Guidance on Preparing Workplaces for COVID-19](#)
- [CDC: Prepare your Small Business and Employees for the Effects of COVID-19](#)

Safe Start Team/Business Recovery/Quality Assurance Team

The agency shall establish an internal team comprised of one or more management representatives and the safety coordinator to periodically review the agency's COVID-19 "Safely Returning Employees to the Workplace Plan." Through this review, the team shall 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. This information will be forwarded to the agency director to enhance the agency's Continuity of Operations (COOP) Plan; this information shall also be shared with.

LEO Safe Start Team
<ul style="list-style-type: none">• Sean Egan• Brian Carpenter• Teri Martin• Jack Nolish• Heather McBrien• Keri Lardie• Daphne Wells• Sidney McBride• Mark Long• Kimberly Berry• Janice Cosey• Erica Quealy• Mark Richard