

Constitution Hall COVID-19 Preparedness & Response Plan

✔ General

The following COVID-19 preparedness & response plan has been established for the Michigan Department of Agriculture & Rural Development (MDARD) in accordance with MIOsha Emergency Rules for Coronavirus disease 2019 (COVID-19). The purpose of this plan is to minimize or eliminate employee exposure to SARS-CoV-2.

The Emergency Rules have general safeguards applicable for all workplaces and specific safeguards for certain industries. The MDARD Safe Start Team has read these emergency rules carefully, developed the safeguards appropriate to MDARD based on its type of business or operation, and has incorporated those safeguards into this COVID-19 preparedness and response plan.

MDARD has designated one or more worksites supervisors to implement, monitor, and report on the COVID-19 control strategies developed in this plan.

For the purposes of this plan, the Constitution Hall's escalation contacts are as follows:

Staff's Immediate Supervisor: Following MDARD Procedure

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MDARD Occupational Health & Safety Specialist: Jon Kujat

The plan will be made readily available to our employees and their representatives. The plan will be made available via the MDARD Sharepoint site at the following ([link](#)).

✔ Exposure Determination

MDARD has evaluated 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. The MDARD Safe Start Team was responsible for the exposure determination, including MDARD's Occupational Health & Safety Specialist.

MDARD has determined that its employees' jobs fall into only the lower exposure and medium exposure risk categories as defined by the OSHA Guidance on Preparing Workplaces for COVID-19:

- **Lower Exposure Risk Jobs.** These jobs do not require contact with known or suspected cases of COVID-19 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. Examples are small offices, small manufacturing plants (less than 10 employees), small construction operations (less than 10 employees), and low-volume retail establishments, provided employees have infrequent close contact with coworkers and the public.
- **Medium Exposure Risk Jobs.** These jobs are those that require frequent 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. Examples are most jobs at manufacturing plants, construction sites, schools, high-volume retail settings, and other high-population-density work environments.

The MDARD Safe Start Team verifies that MDARD has no high-risk exposure jobs. High exposure risk jobs have high potential for exposure to known and suspected cases of COVID-19. Examples are most jobs in healthcare, medical transport, nursing homes and residential care facilities, mortuaries, law enforcement, and correctional facilities.

MDARD has categorized its jobs as follows:

NOTE: Some jobs may have more than one type of exposure risk depending on the task or qualifying factors.

Job/Task (Table 1.0)	Exposure Risk Determination (Lower or Medium)	Qualifying Factors (Ex. No Public Contact, Public Contact)
Agriculture Development Division (AGD – 11 staff)	Low Risk	No Public Contact
Animal Industry Division (AID – 29 staff)	Low Risk	No Public Contact
Environmental Stewardship Division (ESD – 36 staff)	Low Risk	No Public Contact
Executive Office (EXO – 33 staff)	Low Risk	No Public Contact
Food & Dairy Division (FDD –	Low Risk	No Public Contact

19 staff)		
Pesticide, Plant Pest Management (PPPM – 19 staff)	Low Risk	No Public Contact

This document covers all job roles at Constitution Hall or field staff visiting the location for equipment, supplies, etc. In the event a title is omitted, this exposure plan covers all staff working at this location. As Constitution Hall is managed by the DTMB agency, MDARD is anticipating additional direction related to engineering and administrative controls. MDARD plans to be in full compliance with any direction provided by DTMB.

✔ Engineering Controls

MDARD has implemented feasible engineering controls to minimize or eliminate employee exposure to SARS-CoV-2. Engineering controls involve isolating employees from work-related hazards using ventilation and other engineered solutions. 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.

For lower exposure risk jobs, new engineering controls are not required. For medium exposure risk jobs, engineering controls can include:

- Installing physical barriers (such as clear plastic sneeze guards) between coworkers or between workers and customers.
- Increasing the amount of ventilation in the building.
- Increasing the amount of fresh outdoor air that is introduced into the building.

MDARD’s Occupational Health & Safety Specialist along with department supervisors will be responsible for seeing that the correct engineering controls are chosen, installed, maintained for effectiveness, and serviced when necessary.

The following engineering controls have been implemented:

Job/Task	Engineering Control
All titles listed in table above in Table 1.0	N/A

✔ Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. MDARD’s Deputy Director along the MDARD’s Occupational Health & Safety Specialist will be responsible for seeing that the correct administrative controls are chosen, implemented and maintained for effectiveness.

The following administrative controls have been established for Constitution Hall:

(Choose the controls below that are feasible for your workplace. Delete the controls that are not feasible or applicable. Add additional rows for other feasible administrative controls that will be implemented. In the first column, indicate which jobs or tasks will use each administrative control.)

Job/Task	Administrative Control (For Example, Workplace Distancing, Remote Work, Notifying Customers)
All employees	Maintain at least six feet from everyone on the worksite.
All employees	Use ground markings, signs, and physical barriers to prompt employees to remain six feet from others.
All employees	Promote remote work (telecommuting) to the fullest extent possible.
All employees	Promote flexible work hours (staggered shifts) to minimize the number of employees in the facility at one time.
All employees	Establish alternating days or extra shifts to reduce the total number of employees in the facility at a given time.
All employees	Restrict business-related travel for employees to essential travel only.
All employees	Restrict face-to-face meetings. Communicate with others through phone, email, teleconferencing, and web

	conferencing.
All employees	Restrict the number of customers in the establishment at any given time.
All employees	Minimize the sharing of tools, equipment, and items.
All employees	Provide employees with non-medical grade face coverings (cloth face coverings).
All employees	Require employees to wear cloth face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.
All employees	Encourage proper cough and sneeze etiquette by employees, including covering coughs and sneezes and coughing and sneezing in one's elbows rather than hands.
All employees	Ensure that sick leave policies are flexible and consistent with public health guidance, so employees do not go to work sick.
All employees	Do not require a healthcare provider's note for employees who are sick with acute respiratory illness to validate their illness.
All employees	Maintain flexible policies that permit employees to stay home to care for a sick family member.
All employees	Until otherwise directed MDARD staff is prohibited from bringing in non-MDARD personnel into Constitution Hall
All employees	MDARD staff are prohibited from entering their peer's cubicle or office spaces. Instead utilize other forms of communication (Teams, phones, Facetime, etc.) versus face-to-face discussions.

Hand Hygiene

MDARD Department supervisors 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 employees' hands are potentially exposed to SARS-CoV-2. When handwashing facilities are not available, MDARD shall provide employees with

antiseptic hand sanitizers or towelettes. MDARD will provide time for employees to wash hands frequently and to use hand sanitizer.

MDARD shall promote frequent and thorough hand washing, including by providing workers, customers, and worksite visitors with a place to wash their hands. If soap and running water are not immediately available, provide antiseptic hand sanitizers or alcohol-based hand towelettes containing at least 60 percent alcohol.

✔ **Disinfection of Environmental Surfaces**

MDARD's Safe Start Team will work in collaboration with DTMB, will work to increase facility cleaning and disinfection to limit exposure to COVID-19, especially on high-touch surfaces (for example, door handles), paying special attention to parts, products, and shared equipment (for example tools, machinery, vehicles). MDARD will make cleaning supplies available to employees upon entry and at the worksite.

Department supervisors will be responsible for seeing that environmental surfaces 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-CoV-2. When choosing cleaning chemicals, MDARD 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.

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

Surface		Schedule/Frequency
Workspaces		After each use
Refrigerators		After each use
Microwaves		After each use
Fax machines		After each use
Printers		After each use

Constitution Hall facilities (DTMB) will perform enhanced cleaning and disinfection after persons confirmed to have COVID-19 have been in a work area. In the interim, that work area will be temporarily closed, and employees will be sent home or relocated.

The MDARD Safe Start Team will be responsible for seeing that this protocol is followed.

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

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

✔ Personal Protective Equipment (PPE)

MDARD will provide employees with the types of personal protective equipment, including respirators if necessary, for protection from SARS-CoV-2 appropriate to the exposure risk associated with the job. The employer must follow current 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.
- 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.

MDARD will provide non-medical grade face coverings (cloth face coverings) to employees (cloth face coverings are technically not considered PPE). MDARD will require employees to wear face coverings when they cannot consistently maintain six feet of separation from other individuals in the workplace.

Masks that incorporate a valve or other openings, holes, or visible gaps in the design or material to facilitate easy exhaling are NOT sufficient 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.

Masks in the workplace shall NOT be political, offensive or contain vulgar, obscene, abusive, or confrontational gestures, language, pictures, websites, etc. Masks representing certain colleges, universities, sports teams, etc. are permissible provided they meet previously mentioned criteria.

Employees who are medically unable to wear a mask must contact the Quality of Life Human Resources Office Reasonable Accommodation Coordinator to initiate the reasonable accommodation process.

All questions regarding proper usage of PPE items should be directed at MDARD's Occupational Health & Safety Specialist.

- In the event that workplace hazards require a N-95 mask (or equivalent), staff are required to be medically evaluated, trained and fitted prior to wearing this level of respiratory PPE. If you have any questions related to N-95 (or equivalent) usage, please refer to MDARD's Respiratory Protection Plan.

PPE may also consist of gloves where needed. Please note that gloves are not recommended unless you are disposing after every use/touch point; MDARD has provided hand sanitizer for this purpose.

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.

MDARD will conduct a daily entry self-screening protocol for all employees entering the workplace, including, at a minimum, a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19.

As workers enter the place of employment at the start of each work shift, MDARD will

have employees self-screen for COVID-19. MDARD will have employees complete a questionnaire covering the signs and symptoms of COVID-19 and their exposure to people with suspected or confirmed COVID-19. MDARD will similarly screen contractors, suppliers, and any other individuals entering the worksite.

Employees have been directed to promptly report any signs and symptoms of COVID-19 to their supervisor and/or QOL-HR and/or QOL Human Resource Office before and during the work shift. MDARD has provided employees with instructions for how to make such a report to the employer.

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

Employees should immediately contact their supervisor and the QOL Human Resources Office to report any signs and symptoms.

MDARD 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.

MDARD will not discharge, discipline, or otherwise retaliate against employees who stay at home or who leave work when they are at particular risk of infecting others with COVID-19.

When an employee is identified with a confirmed case of COVID-19, QOL HR will notify the local public health department immediately, and any co-workers, contractors, or suppliers who may have come into contact with the person who is the confirmed case of COVID-19, within 24 hours. When notifying coworkers, contractors, and suppliers, QOL HR will not reveal the name or identity of the confirmed case.

QOL HR will allow employees with a confirmed or suspected case of COVID-19 to return to the workplace only after they are no longer infectious according to the latest guidelines from the CDC.

✔ Training

MDARD shall coordinate SARS-CoV-2 training and ensure compliance with all training requirements.

MDARD will train workers on, at a minimum:

- Workplace infection-control practices.
- The proper use of personal protective equipment.
- Steps the employee must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.
- How to report unsafe working conditions.

MDARD Safe Start Team shall create a record of the training. Records should include the name of the employee(s) trained and the date of the training.

The Office of State Employer (OSE) has developed a COVID-19; Keeping you safe at work training that is now available in the Civil Service Learning Management System.

This training is required for all State of Michigan Employees:

1. Go to [Link](#)
2. Civil Service has provided guidance to search for the “COVID-19; Keeping You Safe at Work” training using the global search on the upper right, as it will not be with employee’s transcripts.

✔ Recordkeeping

MDARD will maintain records of the following requirements:

- Training. The employer shall maintain a record of all COVID-19 employee training.
- Screening protocols. The employer shall maintain a record of screening for each employee or visitor entering the workplace.
- When an employee is identified with a confirmed case of COVID-19, record when the local public health department was notified; as well as any co-workers, contractors, or suppliers who may have come into contact with the person who was the confirmed case of COVID-19.

MDARD Safe Start Team will ensure that the records are kept.