

Field Based Home Offices 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 Field Home Office's escalation contacts are as follows:

Staff's Immediate Supervisor:	Following MDARD Procedure #29
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 – 7 staff)	Medium Risk	Public Contact
Animal Industry Division (AID – 30 staff)	Medium Risk	Public Contact
Environmental Stewardship Division (ESD – 22 staff)	Medium Risk	Public Contact
Food & Dairy Division (FDD – 101 staff)	Medium Risk	Public Contact
Laboratory Division (LAB – 32)	Medium Risk	Public Contact

staff)		
Pesticide, Plant Pest Management (PPPM – 69 staff)	Medium Risk	Public Contact

☑ 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.

☑ Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. The MDARD Safe Start Team 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 Field Based Home Offices:

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	
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	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	It is recommended MDARD staff only enter restrooms that have a one-person capacity.
All employees	Change behaviors where necessary to minimize contact with the regulatory community. Eliminate signatures where possible on inspection documents, minimize touching and unnecessary public exposure.
All employees	Individual hand sanitizer is available, please contact your supervisor if any individual sanitizer bottles are needed.
All employees	Continue to utilize alternative forms of communication (teams, phones, facetime, etc.) versus face-to-face

	discussions with the regulatory community.
--	--

☑ Hand Hygiene

All staff 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.

☑ Disinfection of Environmental Surfaces

All staff will 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.

All staff 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.

Vehicle Guidance:

Staff shall strictly follow the clean-in and clean-out vehicle approach in the public, use of cloth face coverings, and social distancing guidance.

- Common touch points in motor vehicles and equipment must be sanitized between uses.
- Hand sanitizer must be placed in vehicles.
- Prior to using a vehicle use a sanitizing wipe to clean all surfaces that may be touched including:
 - Steering Wheel
 - Door Handles

- Turn signals and wiper controls
- Climate control knobs
- On board control panel / radio controls
- Shift handle
- Sun Visor
- Dashboard
- Glove box handle
- Center console
- Keys
- Seatbelt hardware
- Rearview Mirror
- When sanitizing wipes are getting low, replace them before they run out.
- Sanitize any tools or equipment taken in and out of the vehicle.
- Staff should wash their hands with soap and water after using a vehicle or equipment.
- Without OSE approval multiple employees are prohibited from riding to job sites in the same vehicle. Employees must drive separately to work sites to maintain social distancing.
- During and after fueling of equipment or vehicles or if entry into a business location is necessary, appropriate PPE must be worn and proper sanitization of hands must occur.

Interaction with Licensees or 3rd Parties:

Employees should hold meetings as a conference call or virtual meeting where possible. When it is necessary to meet with individuals at their work location, employees should observe the following practices:

-
- All paperwork should be electronically signed and exchanged when possible.
- If paperwork cannot be completed electronically, workers can take a picture of documents and send by email. If documents need to be signed and exchanged in person, have the other person step away to review and sign.
- Avoid sharing pens, clipboards, etc. with others and wear appropriate PPE during the meeting.
- Wash hands after returning indoors and wipe all surfaces immediately. If hand washing cannot be done, use hand sanitizer.
- Recognize establishment operators and staff are under an unusually high level of stress in this unprecedented time. If the inspection is not a “for cause” inspection, the operator appears under extreme pressure or agitated, and you are concerned for personal safety, consider delaying the inspection.
- Consider contacting the establishment and discussing the inspection in advance of the scheduled inspection date. Given the current environment, conducting unannounced inspections may not be the most practical unless specific conditions at the establishment indicate the need for an unannounced arrival.
- Schedule field inspection work at times when consumer traffic is low. This may include an earlier or later start time, or arriving on days that are

historically less busy, or completing field activities outside of an establishment's public operating hours.

- The regulatory community/business may request staff to complete a health screening or questionnaire at their off-site facility. Although each business may have unique verbiage the questions should be similar to the MDARD Health Screening survey. Please avoid providing personal information, example birthdate, social security number, etc.
- Avoid physical contact at all times, restrain from shaking hands or exchanging business cards.
- Only bring equipment into the establishment that is needed for the inspection. Limit the amount of equipment to that which you can carry and that which can be easily disinfected.
- Conduct exit interview via phone or email when possible.

If at any time during the inspection, you feel your personal safety is at risk, immediately discontinue the inspection, leave the establishment and contact your supervisor.

✔ 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. MDARD will consider face shields when employees cannot consistently maintain three 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 or contractors 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. .

Employees have been directed to promptly report any signs and symptoms of COVID-19 to their supervisor and/or QOL Human Resources 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.