

COVID-19 Preparedness Plan for the Michigan Department of Civil Rights

Disclaimer: This is an evolving situation and plan. We, like the rest of State Government, have no concrete plan at this time to transition our employees back to the office or to work facilities in the immediate future. Based on office location and activities in that location, different rules, policies, and procedures may exist to meet local health department orders and guidelines, as well as protocols, rules and procedures for entry to a facility. MDCR may further expand or update this plan in collaboration with staff, building management, Office of the State Employer, Michigan Civil Service Commission, and state and federal health officials to comply with established safety guidelines and mandates.

Introduction

This Coronavirus/COVID-19 Preparedness and Response Plan has been established for the MDCR 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 MDCR intranet and upon request. The MDCR 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 our Human Resources Director.

The Michigan Department of Civil Rights (MDCR) is committed to providing a safe and healthy workplace for all our employees and visitors. We have developed this preparedness plan to mitigate the potential for transmission in our workplaces and communities which requires full cooperation among our workers and visitors. Only through this cooperative effort can we establish and maintain your safety and health and that of our shared workplaces.

Everyone is responsible for implementing and complying with all aspects of this plan. MDCR managers, supervisors and employees have our full support in enforcing the provisions of this policy.

Our employees are our most important assets. We are serious about the safety and health of everyone working at MDCR and your involvement is essential in developing and implementing a successful COVID-19 Preparedness Plan. By engaging you and your colleagues through the assessment, development, and training process, we believe we have addressed your concerns, taken into consideration your suggestions and feedback, and successfully integrated our operations into this plan. Our COVID-19 Preparedness Plan follows Centers for Disease Control and Prevention (CDC) and Michigan Department of Community Health (MDCH) guidelines, federal OSHA and Michigan MIOSHA standards related to COVID-19 and applicable Executive Orders to address:

- hygiene and respiratory etiquette
- engineering and administrative controls for social distancing
- cleaning, disinfecting, and decontamination
- prompt identification and isolation of sick persons
- communications and training that will be provided to managers and employees
- communications and instructions for customers and
- management and supervision necessary to ensure effective implementation of the plan.

Exposure Determination and Engineering Controls

See the COVID-19 Preparedness & Response Plan for Michigan Department of Civil Rights Lower & Medium Risk Employees Document.

Screening and policies for persons exhibiting signs and symptoms of COVID-19

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.

Workers will be informed and are required to self-monitor for signs and symptoms of COVID-19. The following policies and procedures are being implemented to assess workers' health status prior to entering the workplace and for workers to report when they are sick or experiencing symptoms. First, before leaving your residence or other location and coming to an MDCR office/facility, if you believe you are sick or are showing signs or symptoms of COVID-19, do not come to your office destination. Seek medical assistance and/or treatment. As per normal policy and procedure, notify your supervisor of your health status and plan to submit an appropriate SIGMA entry for your time/absence. An electronic screening form will be available on the MDCR SharePoint/Intranet site for you to complete and return to your manager before going into the office. The form establishes your health status and creates an affirmative duty to report any changes to it. Non-Employees will be required to complete a hard copy of the form upon entry into the office.

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.

If you become sick or believe you are showing the signs/symptoms of COVID-19 while in the workplace, notify your supervisor and seek medical attention. If you are able to leave the facility on your own, do so immediately. If you are unable to leave the facility on your own, self-isolate until a family member or other party is available and/or medical first responder is on-scene and can take you to a health facility. Notify your supervisor of any possible contaminated surfaces or space so your supervisor can restrict access to that area and report/request DTMB cleaning services take appropriate action to render those items safe and reopen the space. MDCR conference rooms may be used as a space to self-isolate.

MDCR follows the Office of State Employer (OSE) and Civil Service Commission (CSC) leave policies 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. This includes applicable Family Medical Leave Act (FMLA) and other policies addressing these situations. Accommodation policies for workers with underlying medical conditions or who have household members with underlying health conditions have also been implemented through OSE and CSC.

MDCR also follows OSE and CSC policy for informing workers if they have been exposed to a person with COVID-19 at their workplace and requiring them to quarantine for the required amount of time as identified by the HR director. HR directors are handling COVID-19-related information to help protect the privacy of workers' health status and health information

The above referenced policies and procedures can be found at the MDCR Intranet page for COVID-19.

Handwashing

Basic infection prevention measures are required at MDCR workplaces at all times. Workers are instructed to wash their hands for at least 20 seconds with soap and water frequently throughout the day, but especially at the beginning and end of their shift, before eating and after using the restroom. Customer and visitor access to MDCR offices will be strictly limited, and those who do come to the workplace will be required to wash or sanitize their hands before or immediately upon entering our offices. Hand-sanitizer dispensers (that use sanitizers of greater than 60% alcohol) are at entrances and locations in the workplace so they can be used for hand hygiene in place of soap and water, as long as hands are not visibly soiled. If these supplies are running low or run out please notify the designated MDCR building safety coordinator who will request a re-order.

Respiratory etiquette: Cover your cough or sneeze

Workers and visitors are instructed to cover their mouth and nose with their sleeve or a tissue when coughing or sneezing and to avoid touching their face, in particular their mouth, nose and eyes, with their hands. They should dispose of tissues in provided trash receptacles and wash or sanitize their hands immediately afterward. Respiratory etiquette will be demonstrated on posters and supported by making tissues and trash receptacles available to all workers, customers, and visitors.

Social distancing

Social distancing of six feet will be implemented and maintained between workers, customers and visitors in the workplace through the following engineering and administrative controls: MDCR will maximize its use of telework. Staggered trips to MDCR offices are limited to only when necessary and for the shortest possible time and require manager approval and coordination to reduce the number of employees in the workplace at one time. Provided signage, markings and instructions for employees, visitors and customers about social distancing will be posted. MDCR meeting spaces (conference rooms) should only be used when necessary. Social distancing practices apply. If spacing cannot be increased or social distancing consistently maintained, employees must use personal protective equipment, such as a mask or other face covering. Use of elevators will also be in accordance with social distancing guidelines. Employees should not share or distribute common items such as phones, pens, computer equipment, or other personal work tools and equipment. Care must be taken when using shared

items such as copiers and printers, and handwashing or hand sanitizer is required before and after use of the item.

Personal Protection Equipment (PPE)

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 MDCR building/location, etc. All MDCR 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 MDCR building/location 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 the 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.

- All employees who are medically able are to wear a nonmedical cloth face covering when at the worksites. All employees will be provided reusable cloth masks and instructed on how to properly wash them.
- Visitors to the worksites will be provided a disposable cloth mask.
- Employees may provide and use their own masks if they completely cover the mouth and nose.
- Disinfecting wipes will be provided at multifunction copiers and other equipment used by multiple employees for disinfection between users.
- Physical barriers, such as plastic screens will be installed for reception-office desks and other areas where public visitors are present.
- Employees will be trained on expected use of PPE at work.
- Gloves are not recommended unless you are disposing after every use/touch point; MDCR has provided hand sanitizer and disinfecting wipes for these purposes.

Cleaning and disinfection

Regular housekeeping practices are being implemented, including routine cleaning and disinfecting of work surfaces, equipment, and areas in the work environment, including restrooms, break rooms, and meeting rooms. Frequent cleaning and disinfecting will be conducted on high-touch areas, door handles, elevator panels, railings, etc. Building management will conduct cleaning during evenings consistent with CDC and MDHSS guidelines. Special cleaning will occur to disinfect the workplace if a worker or visitor is symptomatic or diagnosed with COVID-19.

Employee Work Area Responsibilities - Employees are required to 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, chair arm rests, critical surfaces and any other relevant surfaces that may have been exposed to germs.

Appropriate and effective cleaning and disinfectant supplies will be purchased 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.

Communications and training

The MDCR Leadership Team has shared this COVID-19 Preparedness Plan with all employees by email and posted it to the MDCR SharePoint/Intranet website. Employees with questions, comments, or suggestions are encouraged to submit them to the MDCR WorkSafe email which will be monitored for response.

OSE has created and provided “COVID-19: Keeping You Safe at Work” training on the Civil Service Learning Management System. This training is required and in addition to a review of the MDCR 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. To access the training:

1. Go to <https://stateofmichiganlearningcenter.csod.com>
2. Use your 6 or 7 digit employee ID number as your username without an h or leading 0.
3. If you remember your password, please use it. If you have forgotten your password, use the Forgot Password link to reset. It could take up to 15 minutes to receive the email. If you haven’t received the email after 15 minutes, please let Human Resources know and they can assist.
4. Once you have logged in, hover over the Learning Tab, then click View Your Transcript.

The training should be at the top of the Active tab of the transcript. Click Launch. Notices of these procedures have been posted at all MDCR entrance doors for customer view, and customers will be informed on a case by case basis, through telephone contact, email, or other electronic interactions about the limitations on office visits and access to MDCR facilities as needed. Additional communication and training will be ongoing through email, MDCR’s newsletter (CROWN), conference calls and web-based meetings between upper management and managers and managers and their teams. Customers and visitors will also be advised not to enter the workplace if they are experiencing symptoms or have contracted COVID-19 and will be required to adhere to mask and social distancing practices and complete a hard-copy of the health questionnaire or similar upon entering the building. Given the ever changing nature of the COVID-19 emergency, feedback and monitoring of this plan’s implementation and effectiveness

will be ongoing through routine manager/employee meetings, Executive Team meetings, and special sessions designated to collect feedback and input. Changes and updated training guidance will be provided as necessary through routine communications with staff. This COVID-19 Preparedness Plan has been certified by MDCR management and was posted throughout the workplace. It will be updated as necessary.

Gatherings and Returns to the Workplace, and the 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 MDCR 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 venue 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.

Safe Start Team, the Return to Work Task Force and the Business Recovery/Quality Assurance Teams

See the COVID-19 Preparedness & Response Plan for Michigan Department of Civil Rights Lower & Medium Risk Employees Document.

Support and Resources

Employee Service Program: Confidential program to assist employees with personal and work-related concerns. www.mi.gov/esp, 800-521-1377, or MCSC-ESP@mi.gov.

MDHHS Coronavirus Resources: www.mi.gov/coronavirus

CDC Coronavirus Resources: www.cdc.gov/coronavirus/

Employee Training Resources: <https://stateofmichiganlearningcenter.csod.com/>

[State of Michigan Executive Orders & Directives](#)

[State of Michigan Agency/Department Return to Work Plans](#)

[DHHS Epidemic Orders](#)

Michigan.gov/coronavirus

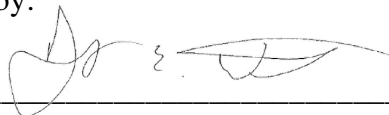
[MIOSHA COVID-19 Resources](#)

[MIOSHA Emergency Rules](#)

[MIOSHA General Industry Safety & Health Standards](#)

[OSHA COVID-19 Resources](#)

Certified by:



James E. White

Executive Director