

COVID-19 Preparedness & Response Plan for Michigan Department of Civil Rights

Lower & Medium Risk Employees

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.

General

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.

Exposure Determination

MDCR will evaluate routine and reasonably anticipated tasks and procedures for all employees to determine whether there is actual or reasonably anticipated employee exposure to COVID-19. The Director, Deputy Director or designee will be responsible for seeing that exposure determination is performed.

MDCR shall 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 COVID-19 nor frequent close contact (e.g., within 6 feet) with the general public. Employees 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 (e.g., within 6 feet) people who may be infected with COVID-19, 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 COVID-19 transmission. In areas where there is ongoing community transmission, employees in this category may have contact with the general public and coworkers.

The MDCR has determined that the following positions/jobs/tasks have been determined to have the following exposure determination(s).

Positions/job/task	Determination	Qualifying Factors (i.e. no public contact, public contact, job task description)
Director, Deputy Directors and all division and unit Management, and Staff Attorneys	Medium	Office worker. Travel or contact with the public. May attend or facilitate meetings involving 10 or more people. Working remotely during state of emergency.
Investigators and Rights Representatives	Medium	Office worker. Travel or contact with the public. Working remotely during state of emergency. Limited office access time. Visitors by appointment only.
Administrative Support and Intake Staff	Medium	Office worker. Contact with the public. Working remotely during state of emergency. Limited office access time. Visitors by appointment only.
Record Center	Lower	Office worker. Contact with public in common areas. Working remotely during state of emergency. Limited office access time.

Engineering controls

MDCR has implemented feasible engineering controls to prevent employee exposure to COVID-19 . 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 COVID-19 include, but are not limited to:

- Installing physical barriers, such as clear plastic sneeze guards where feasible.

The Director, Deputy Director or designee will be responsible for seeing that the correct engineering controls are chosen, installed, maintained and serviced for effectiveness as often as required.

The following engineering controls will be implemented.

Positions/job/task	Engineering Control
All MDCR Front Desk Positions and other meeting areas	Clear plastic guards or barriers.

Administrative Controls

Administrative controls are workplace policies, procedures and practices that minimize or eliminate employee exposure to the hazard. The Director, Deputy Director or designee will be responsible for seeing that the correct administrative controls are chosen, implemented and maintained effectiveness to minimize or eliminate employee exposure to COVID-19.

Examples of administrative controls for COVID-19 in medium risk groups include:

- Adopt zero-tolerance policy and require all customers and visitors, without a reasonable accommodation for a disability, to wear a face mask.
- Require ill employees and visitors to wear a face mask until they are able leave the workplace (i.e., for medical evaluation/care or to return home). 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.
- Keep employees informed about COVID-19 symptoms and prohibit sick visitors from contact with MDCR staff until healthy again, such as by posting signs about COVID-19 where sick visitors may visit (e.g., conference rooms, training room, lobby, etc.).
- Where appropriate, limit 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., phone-based communication, telework).
- Communicate the availability of medical screening or other employee health resources (e.g., telemedicine services, etc.).

The following administrative controls have been established for MDCR.

Position/Task	Administrative Controls
All Employees	1. Employees will continue to work remotely where feasible and efficient.
	2. Communications will be provided to employees to stress the importance of social distancing, proper hygiene practices and to educate employees on policies, procedures, and protocols.
	3. Employees are required to self-monitor for COVID-19 signs and symptoms before leaving for or returning to the workplace.
	4. Employees with COVID-19 symptoms should stay home and request appropriate leave approval or lost time.
	5. Employees who do not pass the screening criteria will be instructed to not report to work and may use appropriate leave or lost time.

Position/Task	Administrative Controls
	<p>6. Employees who experience COVID-19 symptoms at work should notify human resources immediately and will be sent home on appropriate leave or lost time. The Michigan Civil Service Commission (MCSC) has implemented 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. Eligible employees have access to paid sick and annual leave and unpaid medical, parental, and FMLA leaves. Accommodations for workers with underlying medical conditions or who have household members with underlying health conditions can be requested to the HR office.</p>
	<p>7. Employees may be subject to a health screening consistent with the latest guidance from the CDC and MDHHS upon arrival at the workplace.</p>
	<p>8. Employees are also required to promptly report any signs and symptoms of COVID-19 to their immediate supervisor before and during work via telephone, email, or text.</p>
	<p>9. Employees may be directed to wash or sanitize their hands before coming to work, upon entering the building or regularly throughout the workday.</p>
	<p>10. Social distancing of 6' or more will be implemented and maintained where feasible and efficient.</p>
	<p>11. Flexible work schedules will be considered if allowed by operational and budgetary considerations.</p>
	<p>12. On-line conferencing, email and telephones will be used when possible whether teleworking or in the office.</p>
	<p>13. Use of conference rooms for meetings is discouraged. Seating will be limited to ensure appropriate spacing between attendees.</p>
	<p>14. Employees will be encouraged to eat at their desks.</p>
	<p>15. Employee travel will be discouraged or conducted in separate cars if necessary.</p>
	<p>16. Employees who have been exposed to a person with COVID-19 at the workplace and requiring quarantine shall be instructed by the Director, Deputy Director or designee as to next steps. The employee's health status, health information or COVID-19-related exposure information will be kept confidential to the extent possible.</p>

Hand Hygiene & Disinfection of Work Surfaces

The Director, Deputy Director or designee 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 COVID-19. MDCR will also provide employees with antiseptic hand sanitizer.

Regular housekeeping practices are being implemented, including routine cleaning and disinfecting of work surfaces, equipment, tools and machinery, and other areas in the work environment to include but not limited to restrooms, breakrooms, conference/meeting rooms and training rooms.

Frequent cleaning and disinfecting will be conducted in high-touch areas such as phones, keyboards, touch screens, controls, door handles, elevator panels, railings, copy machines, etc. Building management will conduct cleaning during evenings consistent with CDC and MDHSS guidelines.

Special cleaning will occur to disinfect the workplace if an employee or visitor is symptomatic or diagnosed with COVID-19.

Appropriate and effective cleaning and disinfectant supplies have been purchased and are available 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. The maximum amount of fresh air is being brought into the workplace, air recirculation is being limited and ventilation systems are being properly used and maintained. Steps are also being taken to minimize air flow blowing across people.

Disinfecting wipes will be provided at multifunction copiers and other equipment used by multiple employees for disinfection between users.

Personal Protective Equipment or Clothing

The Director, Deputy Director or designee will provide employees with personal protective equipment or clothing (PPE) for the protection from COVID-19 appropriate to the exposure risk associated with the job following the CDC and OSHA guidance and in accordance with the latest [Coronavirus/COVID-19 Executive Orders](#). All types of PPE are to be:

- Selected based upon the hazard to the employee.
- Properly fitted and periodically refitted as applicable.
- Consistently and properly worn when required.
- Regularly inspected, maintained and replaced, as necessary.
- Properly removed, cleaned, stored or disposed of as applicable to avoid contamination of self, others or the environment.

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

Positions/job/task	PPE
All MDCR positions	None currently

For the purpose 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 MDCR facilities. 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 completely cover the mouth and nose and are at least as effective as the nonmedical cloth face covering provided to all staff.

Visitors to MDCR locations will be provided a disposable cloth mask.

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. The Director, Deputy Director or designee will be responsible for ensuring that all required health surveillance provisions are performed as required. *Refer to Administrative Controls established for MDCR above for more information.*

The MDCR will physically isolate any employee with known or suspected COVID-19 from the remainder of the workforce, using measures such as, but 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 (e.g., home) where they are to self-isolate during their illness.
- Assigning known or suspected cases to telecommute and work alone at the location where they are self-isolating during their illness.

Training

The Director, Deputy Director or designee shall coordinate COVID-19 training and ensure compliance with all training requirements. Training shall minimally include but is not limited to:

- 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 employees must take to notify their supervisor of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.

- Measures that the building is taking and work rules employees must follow to prevent exposure to and spread of the virus (e.g., health screening protocol, isolation protocol, social distancing protocol, daily self-screening protocol, self-quarantining and return to work, visitors screening, etc.).
- The use of personal protective equipment if applicable to include the proper steps for putting it on and taking it off.
- Building/office signage.
- Resources available (e.g., Employee Service Program)

NOTE: It is recommended that records of employee training be maintained and that at a minimum document the name(s) of employee(s) trained, date of training, name of trainer and content of training.

Recordkeeping

Per the [MIOSHA Emergency Rule](#), the Director, Deputy Director or designee shall coordinate COVID-19 required recordkeeping including all COVID-19 employee training records, health surveillance records, and records of required notifications for one (1) year from the date of generation and ensure compliance with the latest rules and/or orders. The MDCR Certification of Readiness and COVID Protocols/Preparedness Plan signed by the Director, and the Supervisor Checklist and Health Screening Form have been provided to OSE. The following records are required to be maintained:

- Required training.
- A record of daily entry self-screening protocol for all employees or visitors 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.

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

In accordance with the State of Michigan’s Safely Returning Employees to the Workplace, the MDCR Safe Start Team, the Return to Work Task Force and the Business Recovery/Quality Assurance Teams shall minimally be comprised of MDCR Leadership and the Safety Specialist. Other MDCR employees may be assigned to the special roles.

These teams will be responsible for establishing and implementing return to workplace goals, periodically reviewing the MDCR COVID-19 Preparedness & Response Plan and to 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.

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](#)