

**Michigan Department of Transportation**  
**Supplemental COVID-19 Exposure Control Plan**  
**for Business Continuity for Winter Weather Maintenance**

**October 28, 2020**

**Revised November 25, 2020**

The Michigan Department of Transportation (MDOT) has worked diligently since the outbreak of the COVID-19 pandemic to comply with the executive orders of the governor and the subsequent public health orders of the Michigan Department of Health and Human Services (MDHHS) and to incorporate guidance from the Center for Disease Control and Prevention (CDC) and MDHSS to ensure plans are developed and executed to prevent COVID-19 exposure of citizens and employees to the greatest extent possible.

From the beginning of the pandemic, road and bridge maintenance and big bridge operations were determined to meet the CDC definition of critical infrastructure. Our maintenance staff has continued to report to their workplaces, typically maintenance garages, due to the nature of their work maintaining and repairing the physical infrastructure and the specialized equipment and materials located at these facilities that is needed to perform that work. On March 25, 2020, all field operations were required to develop, communicate, and implement site-specific safety protocols that meet the requirements of CDC and MDHHS guidelines. In July 2020, plans were developed to conform to the MDOT Return to Workplaces plan as approved by the Office of the State Employer. These site-specific plans include requirements for participating in daily health screening, washing hands frequently, using hand sanitizer, social distancing, wearing approved face coverings, and implementing cleaning protocols for facilities and equipment. Overall, MDOT maintenance and big bridge staff have taken the exposure control plans and precautions seriously and incorporated the required protocols for safe work practices and health screening into their daily routines.

MDOT's responsibilities for maintenance change dramatically during the winter season. Winter weather can cause conditions that make roads impassable and hamper the ability of citizens to travel for work, to obtain food and life-sustaining supplies and services, and to receive medical care and emergency services. MDOT maintenance employees perform mission critical services to remove snow and ice, restoring and preserving the functionality of the state trunkline system during and following winter weather events.

Because of the critical nature of the winter weather services we provide, MDOT proposes the following augmentations to our existing exposure control plans and protocols. Taking advantage of the CDC guidance for other critical infrastructure

workers in the health care and emergency service sectors, these additional actions will help achieve greater assurances of screening and detection of COVID-19 related symptoms to reduce the probability of unintended exposure and mitigate the negative impacts of service delivery in the event of positive tests with limited exposure.

1. MDOT has acquired and distributed touchless thermometers to each maintenance facility and toll bridge to incorporate temperature checks as part of the daily health screening process through the winter months of November through March. Every day upon entering the designated point of entry, employees and visitors who will be entering the facility beyond the designated point of entry will be required to screen for COVID-19 symptoms and exposure and complete a temperature check. For toll bridges, visitors subject to temperature checks are defined as those patrons entering the administration buildings, not travelers passing through toll booths and crossing the bridge. Individual employee and visitor temperatures will not be recorded, but if an employee's or visitor's temperature is outside the normal range, they will be considered to have not met the daily health screening criteria and will be required to leave the workplace.
  
2. Only when necessary for business continuity, MDOT intends to implement the practices outlined in the CDC guidelines for critical infrastructure workers for returning employees to work for those employees engaged in performing and directly supporting response to specific winter weather events, emergencies, and big bridge operations through the months of November through March. Per the CDC's "Interim Guidance for Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19" (see attached), when all other strategies for controlling exposure and ensuring business continuity have been exhausted, MDOT may return employees to their workplace as long as they meet the criteria in that guidance, namely, they continue to participate in health pre-screening, remain asymptomatic, wear an approved face covering at all times for 14 days following exposure, social distance and clean their work areas and equipment before and after each use. The Region Engineer, Bureau Director, or Bridge Administrator must provide advanced notice to the OHR Director of the activation of these provisions, which employees and which specific locations and work units are affected and for what anticipated time frame. This could apply to approximately:
  - a. 507 permanent, full time and 183 temporary non-career/limited term Transportation Maintenance Workers, Bridge Workers, Steeplejacks, Trades Helpers, Maintenance Mechanics and Supervisors
  - b. 72 Heavy Equipment Mechanics
  - c. 31 Electricians

- d. 36 Transportation First Responders (Transportation Maintenance Coordinators and Engineers)
- e. 70 Bridge Safety Officers, State Workers and Supervisors

# Interim Guidance for Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19

Accessible version: <https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html>

To ensure continuity of operations of essential functions, CDC advises that critical infrastructure workers may be permitted to continue work following potential exposure to COVID-19, provided they remain asymptomatic and additional precautions are implemented to protect them and the community.

A potential exposure means being a household contact or having close contact within 6 feet of an individual with confirmed or suspected COVID-19. The timeframe for having contact with an individual includes the period of time of 48 hours before the individual became symptomatic.

Critical Infrastructure workers who have had an exposure but remain asymptomatic should adhere to the following practices prior to and during their work shift:

- ▶ **Pre-Screen:** Employers should measure the employee's temperature and assess symptoms prior to them starting work. Ideally, temperature checks should happen before the individual enters the facility.
- ▶ **Regular Monitoring:** As long as the employee doesn't have a temperature or symptoms, they should self-monitor under the supervision of their employer's occupational health program.
- ▶ **Wear a Mask:** The employee should wear a face mask at all times while in the workplace for 14 days after last exposure. Employers can issue facemasks or can approve employees' supplied cloth face coverings in the event of shortages.
- ▶ **Social Distance:** The employee should maintain 6 feet and practice social distancing as work duties permit in the workplace.
- ▶ **Disinfect and Clean work spaces:** Clean and disinfect all areas such as offices, bathrooms, common areas, shared electronic equipment routinely.

If the employee becomes sick during the day, they should be sent home immediately. Surfaces in their workspace should be cleaned and disinfected. Information on persons who had contact with the ill employee during the time the employee had symptoms and 2 days prior to symptoms should be compiled. Others at the facility with close contact within 6 feet of the employee during this time would be considered exposed.

Employers should implement the recommendations in the Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 to help prevent and slow the spread of COVID-19 in the workplace. Additional information about identifying critical infrastructure during COVID-19 can be found on the DHS CISA website or the CDC's specific First Responder Guidance page.

## INTERIM GUIDANCE

This interim guidance pertains to critical infrastructure workers, including personnel in 16 different sectors of work including:

- ▶ Federal, state, & local law enforcement
- ▶ 911 call center employees
- ▶ Fusion Center employees
- ▶ Hazardous material responders from government and the private sector
- ▶ Janitorial staff and other custodial staff
- ▶ Workers – including contracted vendors – in food and agriculture, critical manufacturing, informational technology, transportation, energy and government facilities

## ADDITIONAL CONSIDERATIONS

- ▶ Employees should not share headsets or other objects that are near mouth or nose.
- ▶ Employers should increase the frequency of cleaning commonly touched surfaces.
- ▶ Employees and employers should consider pilot testing the use of face masks to ensure they do not interfere with work assignments.
- ▶ Employers should work with facility maintenance staff to increase air exchanges in room.
- ▶ Employees should physically distance when they take breaks together. Stagger breaks and don't congregate in the break room, and don't share food or utensils.

