



Michigan Department of Labor and Economic Opportunity Bureau of Employment Relations (BER) / Michigan Employment Relations Commission (MERC) COVID-19 Preparedness & Response Plan for Low & Medium Risk Employees

General

The following COVID-19 Preparedness & Response Plan has been established for BER/ MERC in accordance with the Governor's latest [Executive Directives](#), [MIOSHA Emergency Rules](#), [DHHS Epidemic Orders](#), and [CDC guidance](#). This. The purpose of this program is to minimize or eliminate employee exposure to COVID-19. Currently, the agency prohibits staff from regularly reporting to any BER/MERC office. Recognizing some agency functions require onsite presence (mail, phone, lack of VPNs, etc.), limited arrangements will be made for designated staff to perform in-person office and other work assignments. This Return to Work plan will identify those designees and the conditions related to the permitted in-person assignments.

This BER/MERC Return to Work Plan shall be available to employees via direct email, the LEO intranet and upon request. Training on the plan will be provided via webinar using Microsoft Teams or Zoom as noted under Training on page 6. The LEO department and this agency are uncertain when staff will be required to fully transition back to the office, as such this plan may be further expanded and developed in collaboration with staff and building management. Any employee with questions should contact the LEO Office of Human Resources Director. Employees should also refer to the LEO Return to Work Plan via this link: <https://www.michigan.gov/ose/0,4656,7-143--533755--U,00.html>.

The Safe Start Team/Return to Work Task Force/Business Recovery/Quality Assurance Team is made up of the following employees which will periodically review and update the plan:

- Sidney McBride
- Denise Hinneburg
- Deborah Stewart
- Sharon Peper



Exposure Determination

BER/MERC will evaluate routine and reasonably anticipate tasks and procedures for all employees to determine whether there is actual or reasonably anticipated employee exposure to COVID-19. The Bureau Director will be responsible for seeing that exposure determination is performed.

An employer 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 (for example, within six feet) with the public. Workers 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 (for example, within six feet) with 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, workers in this category may have contact with the public and coworkers (for example, schools, high-population-density work environments, high-volume retail settings).

BER/MERC has determined that the following positions/jobs/tasks have the following exposure determination(s).

(NOTE: Some employers may have more than one type of exposure determination in the workplace depending on the evaluation of each positions/jobs/tasks in the workplace. Likewise, employees may perform tasks that have differing exposure determinations depending on assignment or need.)

Positions/job/task	Determination	Qualifying Factors (i.e. no public contact, public contact, job task description)
Labor Division Staff	Low Risk	No Public Contact—appt only
Administrative Support	Low Risk	No Public Contact—appt only
Labor Mediators	Low Risk	Working from Home Offices; Public Contact by Appt only and subject to COVID-19 protection guidelines



Engineering controls

BER/MERC 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:

- Installing physical barriers, such as clear plastic sneeze guards.
- Installing a drive-through window for customer service.

NOTE: Additional engineering controls are not recommended for low exposure risk employees.

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

The following engineering controls have been implemented. (Example: specify the engineering control for each of the positions/job/task listed in the exposure determination, and how each engineering control is intended to function to prevent the spread of COVID-19.)

Positions/job/task	Engineering Control
Labor Relations Staff	Working remotely from home; In office on rotation or by special approval. When in office, assigned to separate offices Maintain 6ft Social Distancing along with masks, wipes, and disinfectants. No outside visitors
Administrative Support (Clerical Staff)	Working remotely with rotation into the office. When in office, uses separate work cubicles with 6ft Social Distancing; Also use masks, wipes, and disinfectants. No outside visitors
Labor Mediators-- Detroit	Working Remotely from home; Limited office appearance with prior approval. When in office, assigned to separate offices Must maintain 6ft Social Distancing along with use of masks, wipes, and disinfectants. Outside meetings conducted Virtually. In person contacts are by appointment and subject to the COVID-19 precautionary safeguards
Labor Mediators-- Outstate	Home offices only. Outside meetings conducted by Zoom. Any in person contacts are by appointment and subject to the COVID-19 precautionary safeguards.



Administrative Controls

Administrative controls are workplace policies, procedures, and practices that minimize or eliminate employee exposure to the hazard. The Bureau Director 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.

Additional engineering controls are not recommended for workers in the lower exposure risk group. Low exposure risk group employers should review public health communications about COVID-19 recommendations and ensure that workers have access to that information. Frequently check the CDC's COVID-19 website: www.cdc.gov/coronavirus/2019-ncov.

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

- Consider offering face masks to ill employees and customers to contain respiratory secretions until they are able leave the workplace (i.e., for medical evaluation/care or to return home). In the event of a shortage of masks, a reusable face shield that can be decontaminated may be an acceptable method of protecting against droplet transmission. 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 customers informed about symptoms of COVID-19 and ask sick customers to minimize contact with workers until healthy again, such as by posting signs about COVID-19 in stores where sick customers may visit (e.g., pharmacies) or including COVID-19 information in automated messages sent when prescriptions are ready for pick up.
- Where appropriate, limit customers' and 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., drive-through windows, phone-based communication, telework).
- Communicate the availability of medical screening or other worker health resources (e.g., on-site nurse; telemedicine services).

The following administrative controls have been established for BER/ MERC.

(Example: specify the Administrative control for each of the positions/job/task listed in the exposure determination, and how each engineering control is intended to function to prevent the spread of COVID-19.)

Positions/job/task	Administrative Control Type (workplace distancing, remote work, notifying customers)
All Office Staff	<ul style="list-style-type: none"> • Mostly telecommute work assignments for all • Few staff with rotating appearance to office with 6ft+



	<p>social distancing, separate workspaces (offices or cubicles.). Maintain social distancing. Handwashing, disinfectant wipes, sprays and sanitizers.</p> <ul style="list-style-type: none"> • Maximum of 1-4 persons in office at any one time
Visitors & Guests	<ul style="list-style-type: none"> • No public or guest access to MERC Offices without prior appointment and subject to prior approval by the Bureau Director and OHR office.

Hand Hygiene & Disinfection of Environmental Surfaces

The designated administrative support person will be responsible for seeing that adequate handwashing materials 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, or where equipment or spaces are shared by others. Where handwashing is not feasible, the antiseptic hand sanitizers, sprays and towelettes shall be placed at prominent locations.

The designated administrative support person will be responsible for seeing that environmental surface 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 COVID-19. When choosing cleaning chemicals, BER/MERC 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 COVID-19 based on data for harder to kill viruses. The manufacturer’s instructions for cleaning and disinfection products will be strictly adhered to.

An enhanced cleaning and disinfection shall be performed after persons suspected or confirmed to have COVID-19 have been in the workplace. The designated administrative support person will be responsible for seeing that such a cleaning and disinfection is performed as required.

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

Surface	Method/Disinfectant Used	Schedule/Frequency
Shared network copiers	Disinfectant Wipes/Spray	Each use; start and end of day
Individual Workstations	Disinfectant Wipes / Spray	Regular Intervals during day
Microwave and Keurig	Disinfectant Wipes/ spray	Each use; start and end of day
Ladies Rest room	Disinfectant spray	Each use; Daily cleaning by maintenance crew

The following methods will be used for enhanced cleaning and disinfection: None



Personal Protective Equipment (PPE)

BER/MERC will provide employees with personal protective equipment for protection from COVID-19 appropriate to the exposure risk associated with the job following the CDC and OSHA guidance applicable to the industry and types of jobs at the workplace and in accordance with established COVID-19 safety protocols and guidelines.

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 when required.
- 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.
- Require masks to be worn when workers cannot consistently maintain six feet of separation from other individuals in the workplace and consider face shields when workers cannot consistently maintain three feet of separation from other individuals in the workplace.

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

Positions/job/task	PPE
Staff appearing in the MERC Office	Self-provided face coverings or masks; On hand Antiseptic Sanitizers, Wipes and Spray

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 Cadillac Place or Mason Building locations. All BER/MERC employees reporting to one of the workplace locations will be required to wear (at minimum) a suitable nonmedical face covering (washable or disposable) and instructed on proper care and use. To the extent possible, agencies will work through the SEOC to acquire face coverings for staff reporting to the workplace. Employees may provide and use their own masks if pre-approved; completely cover the mouth, nose, and chin; and are at least as effective as the nonmedical face covering provided to other 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. If approved, Visitors to the Cadillac Place or Mason 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 must be worn when an employee cannot consistently maintain 6 feet of separation from other individual whenever in shared spaces (e.g., in-person meetings, copy room, hallways, restrooms, breakrooms, elevators, etc.). Additionally, employees who cannot consistently maintain 3 feet of separation from other individuals in the workplace should consider wearing a face shield as added protection. Please contact your Human Resources Director or [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, Mallory Armbrustmacher, ArmbrustmacherM@michigan.gov, 517-335-8764.

Health Surveillance

BER/MERC has implemented a screening protocol to identify known or suspected cases of COVID-19 among employees and isolate them from the remainder of the workforce. The Bureau Director will be responsible for ensuring that all required health surveillance provisions are performed as required.

At the beginning of each day at the start of each work shift the designated administrative support person will screen employees for signs and symptoms COVID-19 as required. Employees have been directed to promptly report any signs and symptoms of COVID-19 to the Bureau Director or Supervisor before and during the work shift and have provided employees with instructions for how to make such a report to the employer.

Manufacturing facilities must also conduct a daily entry screening protocol for workers, contractors, suppliers, and any other individuals entering the facility, including a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19, together with temperature screening as soon as no-touch thermometers can be obtained.

Businesses or operations in the construction industry must also: Conduct a daily entry screening protocol for workers, contractors, suppliers, and any other individuals entering a worksite, including a questionnaire covering symptoms and suspected or confirmed exposure to people with possible COVID-19, together with, if possible, a temperature screening.

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

BER/MERC 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:



- (a) Not allowing known or suspected cases to report to or remain at their work location.
- (b) Sending known or suspected cases to a location (for example, home) where they are self-isolating during their illness.
- (c) Assigning known or suspected cases to work alone at the location where they are self-isolating during their illness.

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.

Feeling Sick at Work- Related Post Exposure Evaluation & Follow-Up

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.

Gatherings and Returns to the Workplace, & the related Authorization Process”.

When 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 the agency/department 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 minimally comply with the applicable [DHHS Epidemic Order](#); however, 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.

Training

Ashley Rahrig, Departmental Analyst, shall coordinate COVID-19 training and ensure compliance with all training requirements.

BER/MERC will train workers on, at a minimum:

- “COVID-19: Keeping You Safe at Work” via MDCS Learning Management System. This mandatory training is in addition to a review of the agency/department plan and other new procedures and protocols
- 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 the worker must take to notify the business or operation of any symptoms of COVID-19 or a suspected or confirmed diagnosis of COVID-19.



- Measures that the facility is taking to prevent worker exposure to the virus, as described in the COVID-19 preparedness and response plan required under section 11(a) of this order.
- Rules that the worker must follow to prevent exposure to and spread of the virus.
- The use of personal protective equipment, including the proper steps for putting it on and taking it off.
- 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.)
- MERC RTW Plan will be available via direct email to staff and on the LEO intranet.

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

Recordkeeping

Ashley Rahrig, Departmental Analyst, in conjunction with the Bureau Director shall coordinate COVID-19 required recordkeeping and ensure compliance with all such requirements as specified under established protocols, agency directives and legal authority.

The following records are required to be maintained:

- Required and requested training.
- A record of 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.
- When an employee is identified with a confirmed case of COVID-19.
- Must maintain all COVID-19 employee training records, health surveillance records and records of required notifications for 1 year from the date of generation (as per the [MIOSHA Emergency Rule](#)).



Resources, Websites and Contacts

- [State of Michigan Executive Orders & Directives](#)
- [State of Michigan Agency/Department Return to Work Plans](#)
- **Employee Service Program/ESP:** Confidential program to assist employees with personal and work-related concerns. www.mi.gov/esp, 800-521-1377, or MCSC-ESP@mi.gov
- [DHHS Epidemic Orders](#)
- Michigan.gov/coronavirus
- [MIOSHA COVID-19 Resources](#)
- [MIOSHA Emergency Rules](#)
- [MIOSHA General Industry Safety & Health Standards](#)
- [CDC](#)
- [OSHA COVID-19 Resources](#)

Attached forms

- Signed Certification of Readiness
- Supervisor Checklist
- Health Screening Forms