

# PACC COVID-19 Workplace Safety Policy

**SCOPE OF POLICY:** All PACC Employees

**Effective Date:** November 20, 2020

PACC places the highest priority on the health and safety of its employees in the workplace. Accordingly, the following policy is adopted to promote and ensure workplace safety in light of the COVID-19 health pandemic and to facilitate a strategic, incremental, and structured reintegration staff into the workplace.

## DEFINITIONS:

- A. **Telecommuting:** A work arrangement in which employees are permitted to perform their job duties away from their onsite designated workstation, either at their personal residence or a location designated by the Executive Director or Assistant Executive Director. Telecommuting is governed by the PACC's Pilot Telecommuting Policy (eff. 3/16/2020).
- B. **Return to Work Directive:** The termination, in whole or in part, of an employee's participation in the Department's Pilot Telecommuting Program which results in the employee resuming some or all of their work duties onsite at his or her office location.
- C. **Telecommuting Directive:** An order that staff work remotely under the PACC's Telecommuting Policy (eff. 3/16/2020).

## PROCEDURES:

### 1. Onsite Operations

- a. Existing Operations: Onsite operations have been reduced since March of 2020 with only necessary staff working onsite periodically to the extent necessary based on operational need. Staffing plans for onsite operations are prepared weekly and are fluid so that the organization has maximum flexibility to respond to public health information and workload requirements. All onsite operations are subject to the safety requirements of this policy.
- b. Return to Work Directive: When returning all or a substantial number of staff to regular work onsite, the Executive Director or Assistant Executive Director shall issue a Return to Work Directive. Once staff have returned to the workplace, the Executive Director or Assistant Executive Director may issue a Telecommuting Directive if it becomes necessary to reduce onsite operations.

- c. Upon returning to onsite work under a Return to Work Directive, staff should:
  - i. Inventory SOM equipment that is being returned to the office.
  - ii. Provide their inventory report to the Technical Services Director and identify any equipment that was lost or damaged.
  - iii. Sanitize all state-owned equipment before being returned to an employee's onsite work location.
  - iv. Remove any out-of-office or modified service message on your voicemail or email.
  
- d. PACC staff who are at an increased risk for COVID-19 under CDC guidelines or reside with a family member at increased risk, may request an exemption from working onsite, including under a Return to Work Directive.<sup>1</sup> The Executive Director or Assistant Executive Director may request a certification from a healthcare provider in support of a request for an exemption from working onsite. For PACC employees, requests for an exemption and supporting documentation shall be submitted to AG HR. Requests for exemption shall be evaluated based on the following criteria, in consultation with the employee's supervisor:
  - i. Whether the individual's job duties can be performed from home;
  - ii. Whether the exemption negatively impacts unit operations;
  - iii. Requests for exemptions by other staff in the division; and,
  - iv. Whether the individual has the necessary and appropriate equipment to work from home.

## **2. Infection Control Practices in the Workplace**

- a. Access Control
  - i. Staff reporting to work onsite must answer the COVID-19 screening questions prior to entry. Questions must be answered using the provided form each time the employee reports onsite. The form must be submitted to the Executive Director and Assistant Executive Director. The Assistant Executive Director must keep a record of the answers to these screening questions for a year. If an employee answers "yes" to any of the screening questions, the employee must stay home and not work onsite.

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<sup>1</sup> For information about people at increased risk, go to [https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/index.html?CDC\\_AA\\_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fneed-extra-precautions%2Fpeople-at-increased-risk.html](https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/index.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fneed-extra-precautions%2Fpeople-at-increased-risk.html)

- ii. The Executive Director or Assistant Executive Director may require an employee to submit to a temperature check. If an employee refuses a temperature check, either the Executive Director or the Assistant Executive Director may send the employee home.
  - iii. Personal interaction with the public should be limited to only those interactions that are necessary considering the circumstances.
  - iv. Due to security requirements, there are a limited number of entry points into the PACC building. Therefore, in order to reduce congestion at main points of entry, the Executive Director or Assistant Executive Director may require staggering the time staff are required to report to work and leave from work.
- b. Social Distancing and Face Coverings
- i. To the extent possible, staff must always maintain at least 6 feet of distance between themselves and others.
  - ii. To the extent possible, staff should occupy workstations with physical barriers separating them from their colleagues (e.g. cubicles with partitions). When insufficient physical barriers exist, supervisors should relocate staff to another area of the office that allows for adequate social distancing.
  - iii. In-person meetings should be limited to circumstances when remote meetings are not a feasible option. When in-person meetings occur, staff who attend meetings must maintain at least 6 feet of distance between attendees.
  - iv. Occupancy in common areas like break rooms, kitchens, supply rooms, copy rooms, hallways, restrooms, etc., should be limited so that staff in those areas can observe social distancing requirements.
  - v. The Executive Director and Assistant Executive Director will consider requests by employees to modify physical layout or make physical changes to better protect personnel, particularly in bottleneck areas and high traffic areas.
  - vi. Only one staff member is permitted to ride in the elevator at a time. Staff are required to wear a facial covering while in the elevator.
  - vii. Staff must wear a face mask or facial covering: (a) in all situations when an employee is unable to maintain six-feet of social distancing; (b) whenever an employee is away from his or her workstation; (c) whenever an employee is interacting with a member of the public in the course of their job duties (both inside and outside of the office); (d) in any common area and (e) when riding in an elevator.

- viii. Staff are required to comply with all other facial covering requirements set out in any applicable Michigan Department of Health and Human Services (MDHHS) Public Health Order and any applicable Michigan Occupational Safety & Health Administration (MIOSHA) Rule.

c. Sanitation & Hygiene

- i. Maintaining proper sanitation and hygiene is a shared responsibility among staff. Supplies for cleaning and disinfecting will be provided by PACC.
- ii. Employees will wipe down his or her work areas thoroughly at the beginning and end of each shift using the provided cleaning supplies. Areas to be cleaned include keyboard, counter tops, computer mouse, laminated protocol reference sheets, door handles, restroom handles and critical surfaces, chair arm rests and any other relevant surfaces that may have been exposed to the operator's germs.
- iii. The sharing of tools and machines should be restricted, to the extent possible. Staff using common equipment, instruments, or tools (e.g. copy machines, fax machines, scanners, staplers, etc.) must sanitize the equipment after each use.
- iv. Furniture like tables, chairs and door handles in common areas should be sanitized after each use.
- v. Staff should wash their hands frequently and cover their nose and mouth when coughing or sneezing.
- vi. Staff should not share food and avoid using drinking fountains to minimize the risk of spreading illness.
- vii. Facility cleaning and disinfection will be increased to limit exposure to COVID-19, especially in high touch areas (e.g. door handles).
- viii. In the event an employee in the workplace has tested positive for COVID-19, deep cleaning and disinfecting of relevant portions of the office will occur as soon as possible. All or part of a worksite may be temporarily closed to allow for deep cleaning.

d. Personal Protective Equipment (PPE)

- i. Pursuant to MIOSHA Part 33 and 433, the Department has assessed the workplace to determine if hazards are present, or are likely to be present, that necessitate the use of personal protective equipment. The predominant hazard potentially present in the workplace is COVID-19 and the PPE required under this policy is intended to mitigate the spread of COVID-19 in the workplace. Accordingly, non-medical grade face masks or facial coverings will be provided for all employees and their use is required as set forth

- in Section 2(b). The Executive Director and Assistant Executive Director can assess which employees may be exposed to additional hazards and require use of additional PPE in accordance with CDC/OSHA guidance and MIOSHA standards. The Assistant Executive Director will keep record of those additional measures.
- ii. Facial coverings and any other PPE necessary to perform job duties will be provided by PACC.
- e. Contact Tracing & Isolation
- i. Any employee feeling sick must stay home from work.
  - ii. The Executive Director, Assistant Executive Director or Unit Directors have authority to send any employee showing symptoms of COVID-19 home.
  - iii. An employee that has tested positive for COVID-19 or that has been exposed to someone that tested positive for COVID-19 must: (1) immediately notify the Executive Director or Assistant Executive Director; and (2) stay home from work for 14 days. When sick, employees will be required to use sick leave in accordance with the Department's leave policy. An employee well enough to work, but required to stay home may request permission from the Executive Director or Assistant Executive Director to telecommute during that timeframe.
  - iv. The Executive Director or Assistant Executive Director will contact: (1) any employees, contractors, or suppliers known to have been in contact with the sick employee to alert them of their possible exposure within 24 hours; and, (2) the local health department immediately.
  - v. A record of the employee report under (iii) and a record of the notifications under (iv) must be maintained by the Assistant Executive Director.
- f. Signage
- i. Each floor shall post appropriate signage as reminders to staff about social distancing requirements, facial covering requirements, hygiene reminders, and reporting requirements if staff get sick with COVID-19.
  - ii. Signage shall also be placed in common areas, bathrooms and elevators reminding staff to limit capacity and practice social distancing.
  - iii. Ground markings, signs, and physical barriers, as appropriate, may be used to cue social distancing requirements for staff.
- g. Education

- i. PACC will disseminate important information or health bulletins about COVID-19.
  - ii. PACC will issue periodic reminders to staff about the Employee Services Program (ESP).
- h. The Infection Control Practices outlined in Section 2 shall remain in place until written notification by the Executive Director or Assistant Executive Director.

### **3. Reducing the Risk of Outbreak**

- a. Each month, the Executive Director and Assistant Executive Director will meet with Unit Directors to discuss any needed onsite staffing for the upcoming month. Staffing plans should allow for telecommuting unless telecommuting interferes with or impedes PACC operations or a particular job duty can only be performed onsite. Any onsite work must be approved by the Executive Director or Assistant Executive Director.
  - b. When developing plans under a Return to Work directive, alternative scheduling arrangements should be considered, including the following:
    - i. *Staggering Onsite Days or Weeks.* Two or more “Teams” that will work onsite on the same days/weeks, as needed.
    - ii. *Avoid Co-Mingling.* Each individual Team should work the same onsite schedule. For example:
      - Week 1: Team A - M, W, F
      - Team B - T, TH
      - Week 2: Team A - T, TH
      - Team B: M, W, F
- Or
- Weeks 1 & 2: Team A works onsite & Team B works offsite
  - Weeks 3 & 4: Team B works onsite & Team A works offsite

Dividing staff into Teams and keeping Teams from co-mingling will reduce the likelihood of having to quarantine an entire division in the event an employee in the division tests positive for COVID-19.

### **4. Travel & visitor restrictions**

- a. Non-essential travel for work is prohibited until further notice.
- b. Essential travel for work should be performed in a manner consistent with the safety protocols outlined in Section 2, to the extent possible.
- c. Non-essential visitors are suspended until further notice.

## **5. Compliance, Reports & Training**

- a. Violations of this policy may result in disciplinary action up to, and including, discharge.
- b. Documents related to an investigation shall be maintained by HR for 3 years after the date the report is made.
- d. PACC will provide a COVID-19 training to employees that covers, at minimum:
  - i. Workplace infection control practices.
  - ii. The proper use of PPE including:
    - When PPE is necessary;
    - What PPE is necessary;
    - How to properly don, doff, adjust, and wear the PPE;
    - The limitations of the PPE, and;
    - The proper care, maintenance, useful life, and disposal of the PPE.
  - iii. Steps employees must take to notify the PACC of any COVID-19 symptoms or diagnosis; and,
  - iv. How to report unsafe working conditions.
- e. Records confirming completion of COVID-19 training must be retained in the employee's training file.
- f. A Safety Coordinator should be onsite whenever staff is working onsite with other staff members. If a staff member is working alone in the building, a safety coordinator does not need to be present. The Executive Director or Assistant Executive Director may designate a safety coordinator as necessary when multiple people are working in the building.
- g. Suspected violations of this policy may be reported to Executive Director, Assistant Executive Director or the on-duty Safety Coordinator.

**6. Emergency Evacuations.** In the event of an emergency, the restrictions on movement and the limitations on capacity outlined in this policy will not apply. Instead, each floor should follow their emergency evacuation plans and procedures, along with any guidance provided by emergency responders.