



# COVID-19 Preparedness & Response Plan

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## General

The Department of Labor and Economic Opportunity (LEO) has developed this **CO**rona**VI**rus **D**isease **2019** (COVID-19) Preparedness & Response Plan in accordance with the [Centers for Disease Control and Prevention's \(CDC\)](#) latest guidance and the [MIOSHA General Duty Clause](#), which requires the employer to furnish each employee with "a place of employment that is free from recognized hazards.....".

The purpose of this plan is to eliminate or minimize potential exposure to and the transmission of COVID-19 in the workplace based on CDC guidance. All employees are responsible for complying with all applicable aspects of this plan. This written plan is available to all employees via the intranet and upon request. Questions about this plan should be directed to the Human Resources Director or the [Agency Safety Coordinator](#).

## Exposure Determination

LEO has evaluated routine and reasonably anticipated tasks and procedures for all employees to determine whether there is actual or reasonably anticipated employee exposure to COVID-19. LEO has determined that all office positions, jobs, or tasks fall into the medium or lower (caution) exposure risk levels. This determination is consistent with the U.S. Department of Labor's Occupational Safety and Health Administration (OSHA) [Hazard Recognition/Clarifying Risk of Worker Exposure to COVID-19](#).

**High Exposure Risk:** - employees in this category include those working with known or suspected patients or sources of COVID-19.

**Medium Exposure Risk:** Jobs that require either frequent close contact (within 6 feet for a total of 15 minutes or more over a 24-hour period) or sustained close contact with other people in areas with community transmission. *Because any given person may be an asymptomatic carrier, an employee's exposure risk may increase when they have repeated, prolonged contact with other people in these situations, particularly where physical distancing and other infection prevention measures may not be possible or are not robustly implemented and consistently followed.*

**Lower (caution) Exposure Risk:** Jobs that do not require close contact (within 6 feet for a total of 15 minutes or more over a 24-hour period) with other people. Employees in this category have minimal occupational contact with the public and other coworkers.



Agency	Exposure Determination	Qualifying Factors
MIOSHA	High Risk	Field staff investigating hospitals or high-risk environments
MIOSHA	Lower Risk	Office staff
MIOSHA	Medium Risk	Field staff
MSHDA	Lower Risk	Office staff
MSHDA	Medium Risk	Limited field work, contact with incoming public
WDCA	Lower Risk	Office staff
WDCA	Medium Risk	Hearing sites including Magistrates and Commissioners with public contact
BER	Lower Risk	Office staff
BER	Medium Risk	Labor mediators-offsite public interaction
Wage & Hour	Lower Risk	Office staff
Wage & Hour	Medium Risk	Regulation agents through offsite public interaction.
E&T	Lower and Medium Risk	Covers 850 employees across 80 locations some risk with field/home visits, meetings with clients.
LEO Executive	Lower Risk	Office staff
Communications	Lower Risk	Office staff
Legislative Affairs	Lower Risk	Office staff
Administrative Services	Lower Risk	Office staff
UIA	Lower and Medium Risk	Covers 750 employees with some staffing public facing offices across the state

Per the CDC, employees are best protected when they are up to date with their COVID-19 vaccination. In general, employees are up to date on their COVID-19 vaccination if they have received all recommended doses in the primary series and [one booster](#) when eligible. Getting a second booster is not necessary to be considered up to date at this time.



## Engineering Controls

LEO has implemented feasible engineering controls to minimize or eliminate employee exposure to COVID-19. Engineering controls involve isolating employees from work-related hazards using ventilation and other engineered solutions (e.g., restrict office access, situate employees with their computers facing inward and away from cubicle doors or aiseways, use of high cubicle walls/panels or other barriers, enclosed offices, etc.). Plexiglass barriers have been provided at workstations where customer service transactions are provided and a 6' distance cannot be maintained.

## Administrative Controls

Administrative controls are workplace policies, procedures and practices that minimize or eliminate employee exposure to the hazard. The following administrative controls have been established for LEO.

Position/Task	Administrative Controls
<p style="text-align: center;"><b>All Employees</b></p>	<p>1. Employees are required to self-monitor for <a href="#">COVID-19 signs and symptoms</a> prior to leaving for the workplace.</p>
	<p>2. Employees who have experienced a new onset of <a href="#">COVID-19 symptoms</a> that cannot otherwise be attributed to an alternate diagnosis or negative COVID-19 test must contact their supervisor and follow the guidance provided from Human Resources for further direction.</p>
	<p>3. Employees who do not pass the screening criteria will be instructed to contact their supervisor, not report to work, and may use appropriate leave credits or lost time. Employees who don't pass the screening criteria due to a positive COVID-19 test or exposure should contact their Human Resources Director.</p>
	<p>4. Employees who experience <a href="#">COVID-19 symptoms</a> at work should notify their supervisor immediately and will not be permitted to stay at work. The Michigan Civil Service Commission (MCSC) and collective bargaining agreements have leave policies in place 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, and FMLA leaves.</p>
	<p>5. Employees are subject to a health screening upon arrival at the workplace.</p>



	6. Employees are required to promptly report any signs and symptoms of COVID-19 to the Human Resources Director during work to their supervisor.
	7. Employees are encouraged to wash or sanitize their hands before coming to work, upon entering the building and regularly throughout the workday.
	8. Flexible/alternate work schedules, remote work, or a combination of remote work/in-office work may be considered on a case-by-case basis. These options are neither a benefit nor an entitlement; they are subject to agency business/operational needs and may be ended by the Director or Human Resources Director anytime for any reason.
	9. Use of videoconferencing or teleconferencing for meetings and gatherings will be considered regardless of teleworking or being in the office.
	10. Employees who have been exposed to a person with COVID-19 at the workplace and requiring quarantine will be instructed by the Human Resources Director 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.

## Hand Hygiene and Disinfection of Work Surfaces

Frequent handwashing is one of the best ways employees can protect themselves from getting sick. To prevent the spread of germs during the COVID-19 pandemic, employees should wash their hands with soap and water for at least 20 seconds or use a hand sanitizer with at least 60% alcohol to clean hands BEFORE and AFTER:

- Blowing your nose, coughing, or sneezing.
- Entering and leaving a public place or work area.
- Preparing or eating food.
- Touching a potentially contaminated surface or object, such as a door handle, table, etc.
- Touching garbage.
- Touching your eyes, nose, and mouth with unwashed hands.
- Using the restroom.

When the provision of handwashing facilities is not feasible, LEO will provide employees with antiseptic hand sanitizers or towelettes.

The virus that causes COVID-19 can land on work surfaces. While the risk of infection



from touching a surface is low, regular housekeeping practices have been implemented for the routine cleaning and disinfecting of elevators, restrooms, breakrooms, conference/meeting rooms, training rooms, doorknobs, and other high touch areas.

CDC guidance will be followed for special cleaning and disinfecting when someone in the office or when someone visited the office has tested positive for 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.

Please refer to the Department of Technology, Management and Budget/[DTMB Return to Office Plan, State Workplace Guidelines](#) for any additional cleaning and disinfection criteria.

## **Face Coverings/Masks and Other Personal Protective Equipment**

Face coverings/masks are generally no longer required while working in an office setting or outdoors subject to some considerations:

- ❖ Quarantine requirements after a positive test or close contact require masking.
- ❖ Masking may still be required in high-risk congregate settings, such as long-term-care, healthcare, and correctional facilities, or in response to accommodation requests.
- ❖ Agencies may have additional policies to address specific operational needs, visitors and clients, employee tasks, work locations, or quarantine or isolation.
- ❖ Local health departments and organizations may adopt other masking requirements to be followed.
- ❖ Employees who are at elevated risk or feel better protected may mask.
- ❖ State masking requirements may be updated in the future as conditions evolve.

LEO will provide employees with any required 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. 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
LEO staff interacting with the public: UI, MRS, BSBP, MIOSHA, WD (including migrant workers), Board of Magistrates	Masks, face shields, hand sanitizer, disinfecting wipes gloves and plexiglass barriers
All LEO staff reporting to work in person	Masks, hand sanitizer and disinfecting wipes

For the purposes of this plan, a nonmedical cloth face covering/mask is NOT considered PPE.

**Note:** Some exceptions may apply; exceptions are NOT automatic. Reasonable accommodations may be available to qualified applicants and employees with disabilities. Employees requesting an exception MUST contact the [Agency ADA Title I Reasonable Accommodation Coordinator](#) to initiate the reasonable accommodation/disability accommodation process.

Employees may provide and use their own face coverings/masks, consistent with operational needs. Face coverings/masks worn in the workplace shall NOT be political, offensive or contain vulgar, obscene, abusive, or confrontational gestures, language, pictures, websites, etc. Face coverings/masks representing certain colleges, universities, sports teams, etc. are permissible provided they meet the above-mentioned criteria.

LEO will continue to have masks available for the public to wear when seeking LEO services, if they choose to do so. Please contact the Human Resources Director or the [Agency Safety Coordinator](#) with any questions.

### **Carpool and Rideshares**

The following protective measures are required whenever two or more persons share either a state vehicle or personal vehicle for work purposes:

- Stay home when sick.



- Increase the fresh air intake via the vents or by slightly opening the windows.
- Clean and disinfect frequently touched surfaces in the vehicle at the beginning and end of each shift, and after an occupant becomes sick. Vehicle and Travel Services (VTS) has advised that drivers using motor pool cars should bring agency-provided wipes to clean and disinfect frequently touched vehicle surfaces at the beginning and end of each shift, as they no longer provide these supplies or clean between uses. Motor pool cars are typically assigned and rotated based on operational need with the vehicle sitting the longest being the assigned first, etc.

## Travel

All international business travel must be approved by the Office of the State Employer (OSE). Requests are to be submitted through the completion of an [online form](#) by the Human Resources Director and will be considered on a case-by-case basis. OSE determinations or requests for additional information will be returned to the individual submitting the online form. A separate request must be submitted for each employee traveling.

To maximize employee protections and potentially prevent the spreading of COVID-19 to others, all persons traveling on behalf of LEO will follow the latest CDC guidance for domestic and international business travel.

All domestic and international business travel should be delayed until employees are up to date with their COVID-19 vaccination.

## Feeling Sick and Sick Employees

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. For employees who have a new onset of symptoms, you must isolate until (1) you receive a negative COVID-19 test, (2) you have received an alternative diagnosis for the new symptoms, or (3) at least five full days pass since the onset of symptoms, you are fever-free for 24 hours without fever-reducing medication, and any other symptoms are improving. When returning after a new onset of symptoms, you must wear a well-fitting mask around others through day 10.

Employees should follow the [LEO COVID Reporting Process](#) if they test positive for COVID-19 so we 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 the Human Resources Director. Guidance on isolation requirements will also be provided and is as follows:

- If you test positive, and have **no symptoms**, you must isolate for five full days from the date your test was taken (day 0). You may return to in person work after five full days have passed. Upon returning to in person work, you must wear a well-fitting mask when around others through day 10.
- If you test positive and **have symptoms**, you must isolate for five full days from the date your symptoms started (day 0). You may return to in person work after five full days have passed, assuming you have been fever-free for 24 hours without using medications and your symptoms are improving. Upon returning to in person work, you must wear a well-fitting mask when around others through day 10.

### **Daily Health Screenings/Health Surveillance**

All employees, contractors, interns, or other persons conducting work on behalf of LEO will be required to participate in daily health screenings upon their return to the workplace. These health screenings are comprised of COVID-related questions about symptoms and suspected or confirmed exposure to people with possible COVID-19.

These health screenings can occur through one or more ways (e.g., paper questionnaire, COVID screening app using a state-issued electronic device, [web-based questionnaire](#) using a personal or state-issued cell phone, or by an employee swiping their employee identification badge/access card to enter restricted areas such as parking lots, buildings, rooms, locked storage areas, etc.).

**Note:** each time an employee logs onto a state-provided electronic device or swipes their identification/badge to access a secure site or area the person affirms they are symptom-free and feeling well.

Persons exhibiting signs of illness will not be permitted into the building.

### **Close Contacts and When to Quarantine**

Employees who are up-to-date with their vaccinations (have received all recommended doses in the primary series and one booster when eligible) or who have tested positive for COVID-19 in the past 90 days do NOT need to quarantine after contact with someone who has COVID-19 unless they have symptoms. However, employees who have not



tested positive for COVID-19 within the past 90 days should get tested 5 days after their exposure, even if they do not have symptoms, and follow other applicable CDC guidance.

Employees who are not up to date with their COVID-19 vaccination should quarantine if they have been in close contact (within 6 feet of someone for a cumulative total of 15 minutes or more over a 24-hour period) with someone who has COVID-19. Quarantine is about keeping employees who might have been exposed to COVID-19 away from others. Follow the [close contact guidance](#) from the Human Resources Office.

## Training

All employees, contractors, interns, or other persons conducting work on behalf of LEO must successfully complete the OSE's "COVID-19: Keeping You Safe at Work" training, which can be found out on the [Civil Service Learning Center](#). This training is in addition to any building-specific training needed to ensure compliance with applicable training requirements and/or COVID-related best practices. Training shall minimally include but is not limited to:

- ❖ Routes by which the virus causing COVID-19 is spread.
- ❖ Symptoms of a COVID-19 infection.
- ❖ Steps employees must take if they have a fever, cough or other symptoms, or believe they might have COVID-19 (e.g., stay home; call their immediate supervisor and healthcare provider; notify their Human Resources Director if the employee, a family member, or someone the employee lives with tests positive for COVID-19 so the agency can contact trace and monitor others with whom the employee had been in close contact while at work; etc.).
- ❖ The risk of a COVID-19 exposure.
- ❖ Measures that the building has taken, and work rules employees must follow to prevent exposure (e.g., hand hygiene, routine cleaning and disinfection, use of personal protective equipment, travel restrictions, daily health screenings, close contact and when to quarantine, building signage, etc.).
- ❖ Resources available (e.g., Employee Service Program).

**NOTE:** It is recommended that employee training records minimally contain the name(s) of employee(s) trained, date of training, name of trainer and content of training.

## Recordkeeping

All LEO COVID-19 related records (e.g., health screenings, training records, etc.) will be kept in accordance with applicable LEO record retention requirements.



All LEO work-related records and COVID-19 exposures will be reported and recorded as required by MIOSHA Standard [Part 11: Recording and Reporting of Occupational Injuries and Illnesses](#). For more information, refer to [OSHA's Updated Interim Enforcement Response Plan for Coronavirus Disease 2019 \(COVID-19\)](#) or [29 CFR 1904.39\(a\)-\(b\)\(11\)](#).

### **COVID-19 Safe Start Team**

The LEO COVID-19 Safe Start Team shall minimally be comprised of the LEO Director, Deputy Director of Labor, Human Resources Director and Facilities Manager/Safety Coordinator. Other LEO employees may be assigned special duties on a case-by-case basis.

This team will be responsible for establishing and implementing return to workplace goals, reviewing and updating the LEO COVID-19 Preparedness & Response Plan, and identifying best practices and improvement needs stemming from agency communications, engineering and administrative work practice controls, and protective measures used during the pandemic.

### **COVID-19 Safety Coordinator(s)**

The LEO Safety Coordinator and Human Resources Director will serve as the LEO COVID-19 Safety Coordinators.

The COVID-19 Safety Coordinators will monitor or report on implemented COVID-19 control strategies required for the workplace as needed or requested.

### **Support and Resources**

Employees having difficulty transitioning back to in-person office work or who are experiencing other personal or professional challenges are encouraged to access resources provided by the [Employee Service Program \(ESP\)](#) website or contact ESP at 800-521-1377 or [MCSC-ESP@mi.gov](mailto:MCSC-ESP@mi.gov). Additional health and safety-related resources can be found below:

- [State of Michigan Agency/Department Return to Work Plans](#)
- [CDC COVID-19 Resources](#) (e.g., vaccines, boosters, possible side effects, etc.)
- [Michigan.gov/coronavirus](https://www.michigan.gov/coronavirus) (e.g., emergency rules, epidemic orders, etc.)
- [MIOSHA COVID-19 Resources](#) (e.g., workplace safety documents, emergency



rules, etc.)

- [MIOSHA General Industry Safety & Health Standards](#)
- [OSHA COVID-19 Resources](#) (e.g., requirements, guidance, tools, etc.)
- Any applicable [State of Michigan Executive Orders & Directives](#)

## **Miscellaneous**

Please refer to the [DTMB Return to Office Plan, State Workplace Guidelines](#) for any additional requirements.