



## **COVID-19 Preparedness & Response Plan for Lower & Medium Risk Employees**

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**The Office of Children's Ombudsman (OCO) does not plan to transition its employees back to the office until the State of Michigan enters Phase 6 of the Governor's Safe Start Plan. The OCO occupies a space in the Arbaugh building which is a multi-unit mixed use (commercial and residential) building that requires staff to utilize public spaces and restrooms also used by Arbaugh commercial and residential customers and the public. There is no dedicated restroom for OCO employees.**

**The OCO's main Infection Control Measure will be keeping the physical OCO office closed and remain in a 100% telecommute workplace. The OCO office in Detroit is located within Cadillac Place. OCO staff who chooses to go into the Cadillac Place office on a limited basis will be required to follow any protocol established by DTMB for the Cadillac Place building. This plan may be further expanded and developed in collaboration with staff and building management.**

### **General**

The following Coronavirus/COVID-19 Preparedness & Response Plan has been established for the Office of Children's Ombudsman (OCO) in accordance with the latest [Coronavirus/COVID-19 Executive Orders](#).

This written program will be emailed to all OCO staff and shared on the OCO's shared drive located at S:\Common. In addition, upon request, the plan will be printed for staff to review. Updates will be versioned, emailed and saved.

### **Exposure Determination**

OCO 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.

OCO 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 SARS-CoV-2 nor frequent close contact (for example, within six feet) with the general 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 (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 OCO has determined that the following positions/jobs/tasks have been determined to have the following exposure determination(s).

<b>Positions/job/task</b>	<b>Determination</b>	<b>Qualifying Factors (i.e. no public contact, public contact, job task description)</b>
Director	Lower	Office working in an apartment building where contact with people who may be infected with COVID-19, but who are not known or suspected COVID-19 patient. Frequent contact with the public in common areas of main office location and in the field.
Deputy Director	Lower	Same as above
Chief Investigator	Lower	Same as above
Investigator	Lower	Same as above
Analyst	Lower	Office working in an apartment building where contact with people who may be infected with COVID-19, but who are not known or suspected COVID-19 patient. Frequent contact with the public in common areas of main office location

SEMA	Lower	Office working in an apartment building where contact with people who may be infected with COVID-19, but who are not known or suspected COVID-19 patient. Frequent contact with the public in common areas of main office location
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### **Engineering controls**

OCO 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, locked front door.
- ❖ Socially distant office spaces.

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 have been implemented.

<b>Positions/job/task</b>	<b>Engineering Control</b>
All OCO positions	Locked Front Office Door, Locked building entrance, Socially distant office space, locked restroom doors, one direction hallways and pathways, removal of seats in breakroom.

### **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 in order to minimize or eliminate employee exposure to COVID-19.

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

- ❖ Consider offering face masks to ill employees and visitors 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](http://www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy).
- ❖ Keep employees informed about [COVID-19 symptoms](#) and ask sick visitors to minimize contact with OCO staff until healthy again, such as by posting signs about COVID-19 where sick visitors may visit (e.g., conference rooms, training room, etc.)
- ❖ Where appropriate, limit visitor' 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., 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 OCO.

Position/Task	Administrative Controls
<b>All Employees</b>	1. Employees will continue to work remotely until phase 6 of the governors safe return to work plan is reached.
	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 <a href="#">COVID-19 signs and symptoms</a> prior to leaving for the workplace.
	4. Employees with <a href="#">COVID-19 symptoms</a> 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.
	6. Employees who experience <a href="#">COVID-19 symptoms</a> at work should notify the Director or Deputy Director 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.
	7. Employees may be subject to a health screening consistent with the latest guidance from the <a href="#">CDC</a> and <a href="#">MDHHS</a> upon arrival at the workplace.
	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.
	9. Employees may be directed to wash or sanitize their hands before coming to work, upon entering the building or regularly throughout the workday.
	10. Social distancing of 6' or more will be implemented and maintained where feasible and efficient.
	11. Flexible work schedules will be considered if allowed by operational and budgetary considerations.
	12. Microsoft Teams, email and telephones will be used when possible whether teleworking or in the office.
	13. Use of conference rooms for meetings is discouraged or every other chair will be removed to ensure appropriate spacing between attendees.
	14. Employees will be encouraged to eat at their desks or during times when break rooms are not busy.
	15. Employee travel will be discouraged or conducted in separate cars if necessary.
	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.
	17. <u>Employee Work Area Responsibilities</u> - Employees will wipe down work areas thoroughly at the beginning and end of each shift using the provided cleaning wipes. Areas to be cleaned include keyboards, counter tops, computer mice, 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.

## 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. When the provision of handwashing facilities is not feasible, the office shall provide employees

with antiseptic hand sanitizers or towelettes.

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:

<b>Positions/job/task</b>	<b>PPE</b>
All OCO 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 the OCO or any SOM office building. All OCO 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 OCO Arbaugh office will be provided a disposable cloth mask.

## **Health Surveillance**

The OCO 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 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 OCO above for more information.*

The OCO 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:

- ❖ 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 self-isolating during their illness.
- ❖ Assigning known or suspected cases to 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 in order 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 that at a minimum document the name(s) of employee(s) trained, date of training, name of trainer and content of training.

## **Recordkeeping**

The Director, Deputy Director or designee shall coordinate COVID-19 required recordkeeping and ensure compliance with the latest [Coronavirus/COVID-19 Executive Orders](#). 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 OCO Safe Start Team, the Return to Work Task Force and the Business Recovery/Quality Assurance Teams shall minimally be comprised of the Director, and Deputy Director. Other OCO employees may be assigned to the special roles.

These teams will be responsible for establishing and implementing return to workplace goals, periodically reviewing the OCO 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](http://www.mi.gov/esp), 800-521-1377, or [MCSC-](#)



[ESP@mi.gov](mailto:ESP@mi.gov).

- ❖ MDHHS Coronavirus Resources: [www.mi.gov/coronavirus](http://www.mi.gov/coronavirus)
- ❖ CDC Coronavirus Resources: [www.cdc.gov/coronavirus/](http://www.cdc.gov/coronavirus/)