

UPDATE:
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Covid-19

Coronavirus / COVID-19
Response Team

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**MIOSHA Revised Emergency Rules:
What's Out, What's In
and What's Next?**

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MIOSHA Revised Emergency Rules-The Basics

- Effective immediately
- Supersede prior Emergency Rules
- Will remain in effect until October 14, 2021
 - Unclear as of now whether they will be revised when the mask requirement for everyone is lifted on July 1
- OSHA General Duty Clause also remains in effect
 - Duty to provide a workplace free from known hazards that are causing or likely to cause death or serious physical harm to employees

What's Out: Things I Can **STOP** Doing

Workplace Controls



- No longer required to prohibit in-person work
- COVID-19 safety coordinator no longer needs to remain on-site at all times when employees are present on site
- No longer need to place posters encouraging employees to stay away from work when sick, cough and sneeze etiquette, and proper hand hygiene practices
- Social distancing
 - No longer need to ensure that fully vaccinated persons maintain 6ft from each other
 - No longer need to ground markings, signs, physical barriers to reduce congestion

Cleaning/Disinfection & Health Surveillance



- Cleaning/disinfection:
 - No longer required to have established procedure/attention to “high-touch” surfaces or shared equipment
 - No longer required to have an established procedure specifically related to suspected/confirmed employee/visitor/customer
- Health Surveillance
 - No more temperature screening
 - No notification to the local public health department when notified of a positive employee/visitor/customer

Masks



- No longer required to provide non-medical grade face coverings to fully vaccinated persons
- No longer must require masks for fully vaccinated employees except:
 - healthcare settings where patients may be present or
 - when using airplane or public transportation if required by the latest CDC guidance
- No longer must automatically require masks in all common spaces
- No longer must require masks for any employee working outdoors
- No longer must require masks for any employee who can consistently maintain 6 feet of separation from other individuals in the workplace

Exposure Determination & Basic Infection Prevention Measures



- COVID-19 Exposure determination for all employee
 - No longer need to include the determination in the COVID-19 Preparedness Plan
- Basic Infection prevention measures
 - No longer need to prohibit workers from using others' phones/desks/offices
 - Cleaning/disinfection: No longer to have an established procedure specifically related to suspected/confirmed employee/visitor/customer

All Industry Specific Requirements & Recordkeeping



- All industry specific requirements
- Recordkeeping
 - Health screening protocols for fully vaccinated individuals
 - Employers must maintain records for 6 months from time of generation

What's In: Things I Still Have To Do

COVID-19 Preparedness Plan & Basic Infection Prevention



- COVID-19 Preparedness Plan
- Basic infection prevention
 - Promote frequent/thorough hand washing, provide antiseptic hand sanitizer
 - Prohibit entry into the workplace for symptomatic employees, employees who have tested positive, and non-vaccinated close contacts
 - Increase facility cleaning in accordance with the CDC
 - Use EPA-approved disinfectants

Health Surveillance

HAVE
TO DO

- Daily entry health screening for all employees and contractors
- Require employees to promptly report signs/symptoms
- Isolate, send home, require remote work for persons known or suspected to have COVID-19
- Notify co-workers/contractors/suppliers who may have come into contact with a person with a known case of COVID-19
- Prohibit employees from entry until isolation/quarantine requirements fulfilled
- ALSO - comply with Michigan COVID-19 Employee Rights Act

Safety Coordinator, Social Distancing & Masks

HAVE
TO DO

- Have a COVID-19 Safety Coordinator
- Ensure unvaccinated employees remain 6 feet apart to the maximum extent feasible
- Masks
 - Provide to unvaccinated employees
 - Require unvaccinated employees to wear while indoors if they cannot consistently maintain 6 feet of separation from other individuals
 - Require for all employees in healthcare settings where patients may be present or when using airplane/public transportation

Masks: Vaccinated/Unvaccinated & Training



- Masks: Vaccinated/Unvaccinated
 - Compliance Options:
 - Keep records of whether employees are fully vaccinated
 - Post signs in the workplace reminding employees that are not fully vaccinated to wear face coverings and to maintain appropriate distancing
 - Allow or require remote work
 - Require face coverings and social distancing for all employees regardless of vaccination status
 - Training
 - Revise to reflect revised requirements
 - Add information about vaccination availability

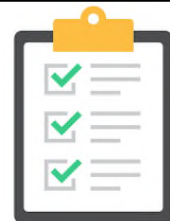
Recordkeeping



- 6 months rather than 12 months
- Daily entry screening: Non-vaccinated employees/contractors
- Positive test protocol notifications
- Vaccination information records *if* you are requiring them

What's Next: HR Checklist

HR Checklist



- Review and revise COVID-19 Preparedness Plan
- Review and revise employee COVID-19 safety training
- Determine mask compliance strategy
 - Employee communication plan
 - Prepare posting if following that option
- Prepare communication to employees regarding all changes to protocols
- Develop return to work plan
 - Prepare process for accommodation requests

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