

Dealer Advisory

September 8, 2020



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Developing COVID-19 Employee Training Materials

As you all know by now, the governor's executive orders mandate proper COVID-19 training for all employees. Unfortunately, the specifics of the required training are rather vague. DADA and MADA have received questions from many dealers asking what to include in the employee training materials. While the training will be different from one dealership to the next depending on policies and procedures in place, we have worked with Colombo & Colombo P.C. to create an outline of *minimum requirements* for your training materials.

This outline has been developed based on guidance from MIOSHA, the CDC, feedback from dealers who have undergone an inspection, as well as the actual state inspectors who handled the inspection. This outline *does not* include county-specific requirements your local health department may have in place. Dealers should review any local requirements and add them to their training.

How to Provide Training Materials to Employees

Dealers can present this information to employees in a manner that works best for your operations. Some have the information in written form, others have created a PowerPoint-type presentation. However you decide to handle it, ensure that every employee is properly trained on the information and has a copy (printed or electronic). We recommend that each employee sign and certify that he or she has read the training materials and understands expectations.

Updating Training Materials

Executive orders, federal guidance, local health department requirements and dealership operations are continuously being modified so it is also important to have procedures in place to make employees aware of any changes to the training. MIOSHA inspectors are talking to random employees, and they are asking questions about procedures that should be in your training -- make sure your employees have the current information.

Provided by Colombo & Colombo, P.C.

Dealership Employee COVID-19 Training

[View a copy of the training outline here](#) (Word document)

This outline includes suggested *minimum requirements* for employee training, which must be provided by the dealership to its employees relating to the COVID-19 virus and the dealership's Preparedness and Response Plan. **The dealership should adjust this presentation to be specific to the measures taken within the dealership -- and include any local requirements that may be in place.**

We also remind dealers that Colombo & Colombo, P.C. has developed a sample [COVID-19 Exposure Prevention, Preparedness and Response Plan](#) (Word document). This sample plan was *revised on August 6, 2020*, following feedback learned from MIOSHA inspections at dealerships. This plan must also be edited so that it is specific to the policies and procedures in place at each individual dealership.

MIOSHA Expectations for Cleaning Following A Confirmed Case of COVID-19

Photographs of the process may be requested by MIOSHA

MIOSHA inspections are ongoing, and they are involved. MIOSHA continues to inspect

dealerships as part of its State Emphasis Program (SEP) and follow up on employee and customer complaints. If the local health department notices a number of COVID-19 cases at the business, that may also trigger an inspection.

If inspected either randomly or after an employee/customer complaint, MIOSHA inspectors will ask for specific information if there has been a confirmed case of COVID-19 at the business. Following are some items frequently requested.

- Date and time of the cleaning
- List of areas cleaned
- Name of company contracted for cleaning
- Invoice for cleaning services
- List *and photos* of chemicals used to clean - provide photos of the actual cleaning products used
- Include multiple photos showing the cleaning in process – cleaners in PPE, cleaning products in hand, different spaces being cleaned, etc.

It appears that many professional cleaning companies are now familiar with the request for photos and some will even take the photos needed. It is suggested that dealers discuss this with the cleaning company to ensure the appropriate photos are available if requested by MIOSHA.

Please feel free to contact DADA at (248) 643-0250 or MADA at (800) 292-1923 if you have any questions.

*This advisory has been prepared in conjunction with
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