

OVERVIEW

As federal, state and local governments begin lifting workplace restrictions, employers are in the position of determining when and how to most effectively and safely resume business operations. Those who proactively develop plans for returning to work and contemplate the new normal will be in the best position to safely resume business operations.

While the federal government has developed guidance and criteria for reopening business, most states have also developed plans or frameworks that go beyond the federal guidance.

Nearly every plan is based on a phased-in reopening contemplating the following:

1. Declines or downward trends in reported COVID-19 related symptoms and cases, along with adequate non-crisis hospital capacity and some level of testing in place for at-risk healthcare workers.
2. Assessing and determining risk levels for individuals and work activities.
3. Monitoring and periodically confirming that COVID-19 cases and/or symptoms have not begun to rebound.
4. Adopting workplace protocols/policies for: social distancing and protective equipment (PPE/face masks), personal hygiene, cleaning and disinfecting, and monitoring symptoms and/or employee health (including temperature checks).

Within the framework outlined above, companies will need to develop specific plans and protocols in several different areas. In general, the most effective approach to returning workers to a workplace will involve:

- Developing a plan
- Implementing the plan
- Maintaining and revising the plan based on updated guidance, information and insight related to the Coronavirus

Federal and state guidance links are available in the Resources section at the end of this document. ***Be sure to stay up-to-date and in compliance with all state and local directives and any industry-specific requirements that impact your specific locations.***

BIG PICTURE REALITIES

Despite the easing of lockdown orders and the opportunity for businesses to reopen, there are some salient points to bear mind as you develop your businesses reopening plan. The coronavirus pandemic continues and case and fatality counts continue to increase. Regardless of how complete and well thought out, your reopening plan will not afford complete protection for your employees or customers.

It is imperative that within the confines of the plan, the following are understood and contemplated:

- Risks to employees cannot be fully mitigated
- Jurisdictional guidance is fluid and changing regularly...clear and complete guidance may not be available, or may change abruptly
- The understanding of the pandemic and the epidemiology of COVID-19 is evolving and new insights are informing public policy frequently and regularly
- Lockdown and Stay-At-Home orders could be reinstated and your plan should include provisions for that scenario

- Employee perceptions of safety and comfort when returning to the workplace will vary significantly
- Lack of daycare when schools are closed will present challenges for some workers that need to be addressed on a case-by-case basis
- At-risk employees or those that live with and/or care for [at-risk individuals](#) (aging parents, grandparents, etc.) will understandably be hesitant to return to workplaces and interact more readily with others until there is a greater level of certainty regarding immunity, vaccination, and control of the spread of COVID-19.
- The ability to test for 1) active COVID-19 cases and 2) presence of antibodies, is evolving and relying on serological data particularly could result in dubious policy decisions. Availability of testing notwithstanding, the accuracy of antibody test results has been called into question. Further, the extent and duration of immunity (if any) to COVID-19 is still being researched and better understood. Without more specific knowledge of who has been exposed and/or the nature and duration of immunity (if any), fully opening up workplaces and society at large presents uncertain levels of risk.

RETURN-TO-WORK FRAMEWORK ELEMENTS

As businesses move toward a return to the workplace, it is useful to have a framework to provide checkpoints that help prevent further spread of COVID-19 as interpersonal contact increases. Several organizations and entities have developed frameworks to help guide and inform employers and workers as they navigate the current and post-pandemic state of work.

The National Safety Council [Safe Actions for Employee Returns \(SAFER\) Framework](#) is a comprehensive framework that has been developed based on review of a wide range of corporate and public health protocols, recommendations, and guidance resources. It outlines key areas that inform corporate and public policy leaders as they take action to reopen businesses and offers elements that are intended to provide a point of reference on practices to revisit and reassess on a continuous basis to identify and address gaps and continuously improve the protocols.

SAFER Playbooks have been developed as guides to navigate the critical areas employers should prioritize as they consider reopening and returning employees to traditional work environments. Each playbook takes a deep dive into the various topic areas that will help organizations strategize reopening plans.

Playbooks in the following areas are available at the [National Safety Council: Safe Actions for Employee Returns: Playbooks](#) website. There are currently 10 topics as follows:

General Employer Considerations

[Physical](#) – Preparing the physical workplace for return to work

[Medical](#) – Protecting the health of workers before and after returning to the workplace

[Stress and Mental Health](#) – Providing employees the support needed to return to work

[Employment, Legal and HR](#) - Preparing the workforce to transition back to the workplace

[Communications](#) – Ensuring effective and timely communication to facilitate return to work

[External Factors](#) – Raising awareness of the outside influences that can impact operations

Operations

Office – Return-to-Work Guidance for Office Operations

Closed Industrial – Applies broadly to warehousing, manufacturing, retail, food/beverage

Open Industrial – Applies broadly to building- or roadway-type construction in open spaces

Public – Applies broadly to public gather spaces, sports facilities, houses of worship

BEST PRACTICES

Paradoxically, the overriding best practice for reopening business is: *Continue to have workers work from home whenever possible.*

As you develop your businesses approach to the reopening and the eventual return of workers to the actual workplace, the following best practice ideas and solutions are offered for consideration.

COVID-19 Pandemic Response/Preparedness Plan Development

Develop and document a COVID-19 Preparedness Plan. The plan should include an exposure assessment and control approach unique to your company, operations, and exposures. Several states will require formally submitting a plan and many will require it in order to issue certification for reopening your business. *States will have different requirements for these plans so be sure to follow local guidance.* Most plans will include sections that address:

- Personal hygiene and respiratory etiquette
 - Engineering and administrative controls for social distancing
 - Cleaning, disinfecting, decontamination and ventilation
 - Prompt identification and isolation of sick persons
 - Communications and training that will be provided to managers and workers
 - Management and supervision necessary to ensure effective implementation of the plan
- Employee Survey: Prepare to survey your employees or otherwise consult with them on the development of return to work plans. This will result in better plans that will proactively address many worker concerns, determine worker availability, address concerns and barriers to returning to the workplace, and ensure that workers are engaged with, and invested in, the new protocols that the company is establishing for work.
 - Plan Documentation: Written plans help meet legal requirements (where applicable) as well as protect and reassure employees who may fear returning to work. They also help ensure consistency throughout the facility. Plans should be industry and employer specific and must address any unique business needs or operations.
 - A plan that clearly identifies WHAT you are doing and WHY you are doing it can be invaluable as evidence of your company's "good faith" relating to regulatory compliance and enforcement questions.
 - Share copies of the final plan with workers in advance of reopening and post the plan at the workplace.

Physical Distancing Plans

Physical distancing protocols and policies should consider the following:

Physical Workspace Modifications

- Heating Ventilation and Air Conditioning (HVAC)
 - Increase fresh air intake by providing more air changes and/or open windows where possible
 - Improve filtration
 - Ensure filters are new, clean and in good operating condition
 - Consider in-room High Efficiency Particulate Air (HEPA) filtration units
- Work Stations
 - Reduce occupant load by utilizing every other or every third work station or cubicle
 - Increase space between desks or work stations to create physical separation
 - Modify open floor plans
 - Install Plexiglas (or similar) barriers when social distancing cannot be maintained
 - Discontinue practice of utilizing shared workstations i.e., assign specific work spaces to each worker
- Common Areas
 - Conference Rooms – Close or limit the number of occupants to allow adequate social distancing, reduce number of chairs to limit occupancy
 - Break/Lunch Rooms – Close or limit the number of occupants to allow for adequate social distancing, reduce the number of chairs to limit occupancy, create usage schedule rotating small groups through
 - High Touch Surfaces
 - Doors – Retro-fit latched doors/handles with automatic or easily pushed doors, install hands-free foot openers
 - Sinks/Faucets – Install motion activated sensors
- Signage - Remind workers and customers of new protocols and procedures including:
 - Maintain social distancing with each other
 - Avoid touching surfaces unnecessarily
 - Wash hands regularly and thoroughly
 - Wear face covering where required and/or where social distancing is not feasible or is ineffective
 - Cleaning and disinfection

Reduce/Limit Personal Interaction and Physical Contact

- Utilize conference calls or video conferences in lieu of in-person meetings
- Limit the size of in-person gatherings based on local jurisdiction guidance (e.g. 6 people or less)
- Employees should be instructed to not use other employee's equipment or workspaces
- Establish a maximum number of employees and/or customers allowed on premises. This may be as low as 25% - 50% of the workforce per local orders.
- Establish or maintain on-going restrictions regarding travel, including local client/customer meetings and events, and seminars/conferences
- Establish a staggered or spaced meal schedule for use of break rooms/lunch rooms

- Establish one-way hallways or main travel aisles with floor markings
- Designate specific entrances and exits exclusively for arrival and departure respectively

Train employees on social distancing policies and protocols

- Identify employer contact for questions or complaints
- Ensure management understands responsibility for enforcement of policies
- Designate responsible individuals for overseeing and ensuring policy implementation
- Consider how to track compliance and provide for consistent discipline for failure to follow protocols

Employee Scheduling

Many state plans will limit the number of workers on site (e.g., 50% of workforce). Reduce the number of employees physically present at the workplace by considering the following:

- Staggered shifts
- Work Teams – A/B/C/etc. teams with only one team present and on-site at a time. This provides the further benefit of reducing the chance of widespread workforce reinfection.
- Continued remote work/work from home consideration for employees who are:
 - High-risk (age, underlying health conditions)
 - Pregnant
 - Living with high-risk family members
 - Symptomatic
 - Tested positive for COVID-19
 - Not yet able (child care, elder care, etc.) or comfortable coming back to the physical workplace
 - Reliant on mass transit (train, subway, bus, etc.) vs. driving their own vehicle
- Maintain a log of employees on premises at any given time to support potential contact tracing/exposure communication efforts

Health Screening Protocols

Some level of health screening is considered essential to help limit exposure to infected or potentially infected co-workers, clients, or customers. Sick or symptomatic individuals should stay home and not be allowed in the workplace and should not have any direct contact with coworkers. The following are considered best practice approaches:

- Establish health screening protocols for workers at the start of each shift. This should include temperature taking and a health screening survey or questionnaire.
- Identify and isolate workers with COVID-19 symptoms and those who have been exposed, and send them home.
- Establish communication protocols when workers have been potentially exposed to ensure that workers that may have come in contact with the infected worker are notified and are encouraged to seek testing where possible.

Daily Symptom Checks/Reporting

Verify that employees entering the facility to work on-premises:

- Are not experiencing COVID-19 symptoms
- Do not live with, nor have been exposed to anyone that has tested positive for COVID-19 or who are currently experiencing symptoms
- Are monitoring their symptoms and contacts

Per the Centers for Disease Control and Prevention, people with COVID-19 have had a wide range of symptoms reported – ranging from mild symptoms to severe illness. The following symptoms may appear 2-14 days after exposure to the virus and are the most common and frequently reported symptoms of individuals who have been diagnosed with COVID-19:

Shortness of Breath or difficulty breathing		Cough		Fever or Chills	Sore Throat	Congestion or Runny Nose	
Fatigue	Muscle or Body Aches	Headache	New loss of taste or smell		Nausea or Vomiting		Diarrhea

Check the CDC website for Symptoms of Coronavirus as they have changed as knowledge of the virus has evolved: <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>

Establish the method for obtaining this information:

- Request employee self-monitor and self-report prior to each work shift
- Reporting can be achieved by:
 1. Use of an intranet site or similar reporting page that can be accessed remotely by employees either the night before or just prior to a shift
 2. Set up a call-in reporting process
 3. On-site screening/questionnaire either via kiosk or other automated system
 4. In-person on-site screening with designated medical staff or HR personnel
- Training of personnel on proper conduct of these screens and maintenance of medical/private information collected
- Screening location and management of employee gatherings/groups

Temperature Screening

Off-Site:

- Require employees to take their temperature at home before coming into the office.

On-Site:

- Set up area where temperature can be taken by a trained nurse or medical professional. In the absence of such an individual, one or more management-level personnel should be designated to conduct the testing.

- Individuals responsible for the testing should review and understand directions for proper use of the thermometer or scanning equipment, and should be trained to follow up in the event of an error or a result that is inconsistent with common sense (readings significantly out of normal range). Training should be documented.
- Equipment:
 - Non-contact infrared thermometers (NCITs) or “Touchless” thermometers are ideal as they eliminate/minimize physical contact and interaction between the employee and the temperature taker. NOTE: There has been a movement to market infrared cameras and other non-FDA regulated telethermographic systems and devices for use in human temperature measurement. The FDA has issued [enforcement guidance](#) regarding the use of these non-regulated products and has essentially stated that they believe the devices will not create undue risk to people where:
 1. There is transparency and clarity regarding the performance of the product, and
 2. An elevated body temperature measurement is confirmed in the context of use with secondary evaluation methods (e.g., non-contact infrared thermometer (NCIT) or clinical grade contact thermometer).

Therefore, ensure that the scanner you obtain and utilize is either a FDA regulated device intended for human temperature measurement or ensure that temperatures measured with non-regulated devices are confirmed as noted above.
 - Oral or other contact thermometers are considered a reasonable substitute, albeit require:
 1. Cleaning and disinfecting (per manufacturer’s instructions) between every use, and;
 2. The temperature taker to don gloves, goggles, face masks and gowns, and to change gloves between each scan
- Ensure social distancing protocols are maintained while employees wait to have their temperatures checked.
 - Consider whether multiple shifts can be established to reduce the number of employees in the worksite and waiting at one time
 - Stagger shift start and end times where possible to reduce the number of employees congregating during shift-change
 - Create staging areas outside the facility (but protected from inclement weather) where employees can wait for temperature checks
 1. Create multiple lines if possible to control crowding
 2. Demarcate pavement or ground in the corridors to remind employees to maintain a minimum 6’ separation
- Temperature Criteria
 - Per CDC guidelines, a fever for COVID-19 purposes is any temperature at or in excess of 100.4 degrees Fahrenheit/38 degrees Celsius. It is advisable to consult state departments of health and local guidelines regarding temperature guidance as well as some have established more restrictive thresholds.
- Positive Test Results
 - If an employee has a fever per the chosen criteria, they should be discretely notified and not allowed to enter the work environment. The individual should be sent home and begin quarantine procedures, including not returning to work for 14 days, and only if they
 1. Have been fever free for three days and
 2. Are otherwise symptom free

- Documentation of Temperature Checks
 - Maintain a record or log of employee temperature check results. This information is considered confidential and must be maintained as such and only provided to those authorized within the company to possess such information.
 - Alternatively, an employer may consider simply recording “yes” or “no” regarding whether the temperature is at or above the threshold temperature on any given day. Regardless, temperature information should be treated as confidential medical information and should not be placed in any employee’s personnel file.

Personnel Protective Equipment

- Issue/provide every employee a reusable facemask and require use in all common areas and when employees leave their workspace
- Identify the need for any additional PPE and source and stock as necessary
 - Gloves for any tasks that may involve:
 - Interaction and exchange of products or goods with a customer
 - Handling mail, cash or other items from vendors or the public
 - Gloves, facemasks, eye protection, etc., for employees utilizing disinfecting chemicals or performing higher-risk tasks

Cleaning and Disinfecting Protocols

- Evaluate the workplace to determine what kinds of surfaces are present
 - Most surfaces/objects will require routine cleaning
 - Frequently touched surfaces will require cleaning and disinfection
 - Cleaning: use of soap and water on a surface
 - Disinfection: application of an EPA-approved disinfectant or alternative
- Frequently touched surfaces and objects that may require disinfection could include:
 - Tables, faucets and sinks, doorknobs, keyboards, light switches, phones, countertops, desks, handles, elevator buttons, microwave/refrigerator handles, coffee pots or coffee machine buttons, shared equipment (printers, scanners, vending machines), etc.
- Determine what items can be removed from the workplace to reduce frequent handling and contact from multiple people. This could include items such as:
 - Soft and porous materials such as rugs and extra seating
 - Common area items: coffee creamer containers, candy dishes, magazines/periodicals
- Establish cleaning and disinfecting schedule
 - Routine cleaning with soap and water alone will reduce risk of exposure and is necessary prior to disinfecting any surface
 - Frequently touched surfaces and surfaces touched by multiple people should be cleaned and disinfected at least daily. Determine if more frequent cleaning and disinfection would be required based on level of use.
- Identify and procure specific cleaning and disinfecting chemicals. [EPA’s list of approved products that are effective against COVID-19](#)

- Renegotiate contracts with cleaning vendors to address changes/additions to typical cleaning protocols
- Provide hand washing products and/or hand sanitizers (at least 60% alcohol) at entrances and exits as well as throughout the work space for employee and customer/visitor use
- Source and stock: Soap, disinfectants, hand sanitizer, paper towels, tissues, cleaning/disinfecting PPE (gloves, safety glasses, masks, face shields, etc.) as needed

Safety Communication Plan/Orientation Training for Returning Workers

- Introduce safety protocols (including company and employee responsibilities) and where to report issues or concerns
- Communicate benefits or perks the company is making available, including reminders about Employee Assistance Programs and general health and medical provider benefits and services
- Consider establishing a safety committee or team to manage planning obligations and provide clear lines of communication with employees. These teams may be required in certain jurisdictions.
- Provide employees with training on:
 - Policies to reduce the spread of COVID-19
 - General hygiene
 - Symptom reporting and what to do if an employee is sick
 - Cleaning and disinfection
 - Cloth face covers
 - Social distancing
 - Use of PPE
 - Safe work practices
 - Stress management

RESOURCE LINKS

Federal Guidance

White House Opening Up America Again: <https://www.whitehouse.gov/openingamerica/>

Occupational Safety and Health Administration (OSHA) Guidance on Preparing Workplaces for COVID-19: <https://www.osha.gov/Publications/OSHA3990.pdf>

Centers for Disease Control and Prevention (CDC) Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19): <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>

CDC Businesses and Workplaces – Plan, Prepare, and Respond: <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/businesses-employers.html>

U.S. Equal Employment Opportunity Commission (EEOC) Guidance: <https://www.eeoc.gov/laws/guidance/pandemic-preparedness-workplace-and-americans-disabilities-act>

CDC Guidance Documents – Home Page: <https://www.cdc.gov/coronavirus/2019-ncov/communication/guidance-list.html?Sort=Date%3A%3Adesc>

State Guidance

Littler Insights – Listing of Statewide Return to Work Protocols: <https://www.littler.com/publication-press/publication/bouncing-back-list-statewide-return-work-protocols>

Additional Select State Resources

Arizona: <https://azgovernor.gov/governor/reopening-guidance>

California: <https://covid19.ca.gov/>

Colorado: <https://covid19.colorado.gov/>

Connecticut: https://portal.ct.gov/-/media/DECD/Covid_Business_Recovery/CTReopens_Offices_C4_V1.pdf?la=en

Florida: <https://floridahealthcovid19.gov/plan-for-floridas-recovery/>

Georgia: <https://dph.georgia.gov/>

Illinois: <https://coronavirus.illinois.gov/s/>

Iowa: <https://coronavirus.iowa.gov/pages/guidance>

Kansas: <https://www.coronavirus.kdheks.gov/>

Kentucky: <https://govstatus.egov.com/ky-healthy-at-work>

Michigan: <https://www.michigan.gov/coronavirus/>

Minnesota: <https://mn.gov/deed/newscenter/covid/safework/>

Missouri: <https://showmestrong.mo.gov/>

Nebraska: <http://dhhs.ne.gov/Pages/Coronavirus.aspx>

Nevada: <https://nvhealthresponse.nv.gov/news-resources/social-media/>

North Carolina: <https://www.ncdhhs.gov/divisions/public-health/covid19>

North Dakota: <https://ndresponse.gov/covid-19-resources/covid-19-business-and-employer-resources/nd-smart-restart/nd-smart-restart-protocols>

Ohio: <https://coronavirus.ohio.gov/wps/portal/gov/covid-19/responsible-restart-ohio/Responsible-Protocols/Responsible-Protocols>

Oklahoma: <https://coronavirus.health.ok.gov/>

Oregon: <https://govstatus.egov.com/or-covid-19>

South Carolina: <https://www.scdhec.gov/infectious-diseases/viruses/coronavirus-disease-2019-covid-19>

Tennessee: <https://www.tn.gov/governor/covid-19.html>

Texas: <https://www.dshs.texas.gov/coronavirus/>

Virginia: <https://www.doli.virginia.gov/covid-19-site-reference-material/>

Washington: <https://www.doh.wa.gov/Coronavirus/workplace>

West Virginia: <https://dhhr.wv.gov/COVID-19/Pages/default.aspx>

Wisconsin: <https://www.dhs.wisconsin.gov/covid-19/index.htm>

Cleaning and Disinfecting

CDC Reopening Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes: <https://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html>

CDC Cleaning and Disinfecting Decision Tool: <https://www.cdc.gov/coronavirus/2019-ncov/community/clean-disinfect/index.html>

CDC Cleaning and Disinfecting Your Facility: <https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>

American Industrial Hygiene Association (AIHA) Workplace Cleaning for COVID-19: https://aiha-assets.sfo2.digitaloceanspaces.com/AIHA/resources/Guidance-Documents/Workplace-Cleaning-for-COVID-19-Guidance-Documents_FINAL.pdf

Personal Protective Equipment

CDC Recommendation Regarding the Use of Cloth Face Coverings: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cloth-face-cover.html>

American Industrial Hygiene Association (AIHA) Get the Facts on PPE: https://aiha-assets.sfo2.digitaloceanspaces.com/AIHA/resources/Public-Resources/RespiratorQASheet_V2.pdf

Hand Washing

<https://www.cdc.gov/handwashing/when-how-handwashing.html>

General Coronavirus Resources

White House – CDC – FEMA: <https://www.coronavirus.gov/>

Occupational Safety and Health Administration (OSHA): <https://www.osha.gov/SLTC/covid-19/>

OSHA Enforcement Guidance for Recording Cases of Coronavirus Disease 2019 (COVID-19): <https://www.osha.gov/memos/2021-03-12/updated-interim-enforcement-response-plan-coronavirus-disease-2019-covid-1>

National Safety Council: <https://www.nsc.org/work-safety/safety-topics/coronavirus>

National Safety Council – SAFER Initiative: <https://www.nsc.org/work-safety/safety-topics/safe-actions-for-employee-returns-safer>

National Safety Council – SAFER Playbooks: https://www.nsc.org/work-safety/safety-topics/safe-actions-for-employee-returns-safer/safer-playbooks?utm_campaign=NSC%20527099&utm_source=hs_email&utm_medium=email&utm_content=88009660&hs_enc=p2ANqtz--jtq8R_BJNDrjC3TrPzes6i7QwLsjMYviUkZDIltreOR12NqB0znl70waSgWQWOjqStY2VCLsudFaPWti-dUvwCDwvkTA&_hsmi=88009660

National Institute for Occupational Safety and Health (NIOSH): https://www.cdc.gov/niosh/emres/2019_ncov.html

CDC Coronavirus (COVID-19) Home Page: <https://www.cdc.gov/coronavirus/2019-ncov/index.html>

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