Continuity Planning – Managing COVID-19 Exposure
Control Measures for Reopening the Workplace

This document is intended to be used as a guideline by Company leaders to develop safe work practices for returning employees to the workplace to reduce the transmission of COVID-19.

The following guidelines are based on our current understanding of the spread of COVID-19 and may not be an exhaustive list of all potential controls. These guidelines as of April 23, 2020 are intended for minimizing the spread of COVID-19 and not all of them have been formally recommended by the CDC or World Health Organization (WHO). These guidelines provide the employer with various controls to consider when reopening their business and returning employees to the workplace. The intent is to help provide a reasonable and prudent approach to minimize the spread of COVID-19. Even if all these guidelines are followed we cannot guarantee it will stop the spread of COVID-19 or guarantee that workers and family members will not become ill.

This is not intended to be legal advice. As many of these steps may involve compliance with federal, state and local law, you should review all procedures and policies with your attorney.

HR and Employment Practice Considerations

The following are important considerations for management to address before returning employees back into the workplace:

- ✓ Continue to encourage telework wherever feasible with your business operations.
- ✓ Is the required Families First Coronavirus Response Act (FFCRA) poster in a prominent location?
- ✓ Consider developing an implementation team that meets daily to discuss new challenges and how your plan is working for bringing employees back to the workplace and any changes to federal, state and local laws which may impact your current approach.
- ✓ Is the "return to the workplace" by employees voluntary or mandatory?
- ✓ Consider developing a policy to address an employee(s) who refuses to return to the workplace?
  - Have you developed an HR policy to properly document the reason for these refusals?
  - Consider special accommodations for employees who are members of a vulnerable population.

- ✓ Do you have policies for effectively monitoring absenteeism and flexible time off?

- ✓ Have you developed a policy for restricting all non-essential travel?

- ✓ Will you require employees to undergo COVID-19 diagnostic or antibody testing before they can return to the workplace? If so, have you:

    - Identified qualified testing laboratories to refer employees to be tested?

    - Identified how soon a test can be scheduled?

    - Identified if you can schedule a block of tests for all employees?

- ✓ Will you be:

    - Instituting health and exposure questionnaires?

    - Conducting temperature checks?

    - Using other screening procedures before allowing workers and visitors to enter the workplace?

- ✓ Have you shared resources with employees who express anxiety about returning to work such as

    - Information about the company's Employee Assistance Program with employees?

    - *CSDZ's Mental Wellbeing Resources for Employees and Families*: http://www.csdz.com/wp-content/uploads/2020/03/Resources-Mental-Health-Suicide-Prevention-For-Employee-Families.pdf

Integration Strategy to Return Employees to the Workplace

- ✓ Continue to use flexible or remote work strategies as part of a phased return of employees to the workplace.

- ✓ As per the CDC Guidelines (https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-at-higher-risk.html), consider developing a policy to identify employees who may be at high-risk from COVID-19 and may need to continue to work from home for an extended period.

- ✓ Maintain regular communication with employees using reassuring language to share the plan for their safe return to the workplace.

- ✓ For critical job functions required to initially reopen the workplace:

    - Do all employees need to return to the workplace for the business to be considered fully functional?

- Are there critical job functions that need to come back immediately?

- Consider the benefits of not bringing everyone back at the same time by separating backup employees who can perform vital business functions if a primary worker is unable to return to work due to a COVID-19 diagnosis, quarantine, or caregiving responsibility.

✓ For non-critical job functions returning to the workplace:

- Consider implementing a hybrid work schedules to split time between being physically present at the workplace and working remotely.

- Consider introducing a small percentage of employees during the initial phase of returning to the workplace.

  - Set up a weekly schedule to rotate employees into the workplace.
  - Use different days to have a new group of employees return to the workplace.

Implementing Employee Screening and Testing

Using a Questionnaire for Employees Returning to the Workplace

If you will use a health and exposure questionnaire as part of your overall control plan for employees returning to the workplace, consider the following:

✓ All completed questionnaires should be collected and stored in a manner that maintains employee privacy and follows data protection laws.

✓ Consider using an electronic questionnaire which employees can access prior to entering the workplace.

✓ Establish a location for employees to complete the questionnaire.

✓ If using paper questionnaires, develop a procedure for distributing, collecting, and sanitizing pens.

✓ Determine what questions you will ask each employee on the questionnaire:

- Are you currently showing symptoms of Influenza/flu or COVID-19 including fever, dry cough, or shortness of breath?

- Have you previously tested positive for COVID-19?

- Are you caring for someone who has been diagnosed with COVID-19?

- Have you had close contact with others who have tested positive with COVID-19 (friends, family members, co-workers, etc.)?

- In the last 30 days, have you:

  - Traveled to a foreign country with a level 2, 3, or 4 travel advisory by the US State Department?

  - Been on a cruise?

  - Visited states or cities with known widespread transmission of COVID-19?

<u>Using a screening process to test employees and visitors for COVID-19 Symptoms</u>

Prior to implementing a screening process, consider the following guidelines:

- ✓ Post signage at workplace entrances providing notice that screening will be performed.

- ✓ Encourage employees to take their temperature at home before leaving for work. Refer to the CDC guidelines (https://www.cdc.gov/coronavirus/2019-ncov/downloads/COVID-19_CAREKit_ENG.pdf)

- ✓ Develop a policy to address consistent screening procedures that ensures employee privacy.

  - Establish separate private screening area beyond the workplace entrance. Consider multiple screening rooms for workplaces with large numbers of employees. Have your Human Resource (HR) involved in developing controls.

- ✓ Identify individuals to screen all persons entering the workplace (medical professionals or trained employees).

  - Identify appropriate PPE for individuals conducting the screening based on anticipated exposures. PPE may include respirators, eye protection/face shields, disposable gloves and gowns, etc.

- ✓ Identify screening tools to be used on all employees and visitors entering workplace (health and exposure questionnaire, temperature checks using touchless thermometers, kiosks, thermal imaging, etc.).

- ✓ Proper disinfection of screening area and tools.

- ✓ If an employee or visitor is identified as having either a temperature of 100.4 degrees or higher, or observed symptoms of COVID-19, develop:

  - Specific procedures/protocols to address on an individual basis and protect their privacy.

  - A protocol for having the person to leave the workplace and seek additional medical care.

  - Notify Human Resources (HR) immediately to provide additional guidance to the person.

  - Determine if notifications to other employees are needed.

Workplace Considerations and Controls

Office Notification Postings

Post the following notifications at workplace entrances to prevent the spread of COVID-19:

- ✓ Stay at home when sick.

- ✓ Avoid personal contact by practicing physical distancing.

- ✓ Cough and sneeze etiquette.

- ✓ CDC Guidelines on personal hygiene/hand washing practices.

- ✓ Notification requirements if an employee develops any symptoms of COVID-19.

Employee Hygiene and Personal Health While in the Workplace

The following guidelines have been developed by the CDC:

- ✓ Discourage direct contact (shaking hands, hugging, etc.); use other non-contact methods of greeting.

- ✓ Avoid touching any part of face, mouth or eyes.

- ✓ Wash hands often with soap and water for at least 20 seconds, especially after blowing nose, coughing, or sneezing; going to the bathroom; and before eating or preparing food.

- ✓ Use a hand sanitizer that contains at least 60% alcohol.

- ✓ Cover mouth and nose with tissue when coughing or sneezing. Immediately dispose of the tissue in the trash and wash hands.

Workplace Practices and Controls

There are many options that you can consider and evaluate to protect your employees as they return into the workplace. The following are examples of controls that can be considered as part of a reasonable and prudent approach to minimize the spread of COVID-19 in the workplace. This list does not include every possible control and you should develop your own workplace specific controls.

- ✓ Consider and evaluate the benefits of converting to automated or touchless controls for items such as lighting, restroom fixtures, trash receptacles, etc.

- ✓ Designate specific entrances and exits for employees and visitors.

- ✓ Establish procedures for entering and exiting the building – use one-way traffic patterns if possible.

- ✓ Encourage the use of cloth face coverings following the CDC's guidelines for proper use and care. Wearing of cloth face coverings may be mandatory in some states or jurisdictions.

- ✓ Have employees use a wipe as a barrier as they enter building to avoid direct contact with handles/knobs, gates/doors, handrails, elevator buttons, etc.

- ✓ Promote the use of hand sanitizer which should be immediately available at entrances.

- ✓ Provide sanitizing wipes throughout the workplace and encourage employees to frequently wipe down their work areas.

- ✓ Establish a plan to maintain 6-feet physical distancing guidelines for employees:

  - Consider stairway use and travel protocols.

  - Consider elevator use protocols to maintain physical distancing.

  - Consider using one-way travel in hallways and corridors to avoid "head-on" pedestrian traffic.

  - Consider floor markings near workstations to remind of physical distancing.

  - Employees should not share workstations or other office supplies or equipment.

  - Consider how to limit employee meetings or visiting with co-worker(s) in their office or at their cubicle.

  - Where possible, employees should use the phone as a means of communication when in the workplace.

  - Consider reconfiguring open office concepts to provide greater separation.

  - Consider how to limit office meetings. Postpone non-essential gatherings (celebrations or lunches).

- ✓ Consider reconfiguring conference rooms and break rooms to allow physical distancing:

  - Reduce the number of chairs.

  - Consider floor markings for recommended physical distancing.

  - Consider staggered break and lunch times.

- ✓ Consider eliminating the following practices:

  - Self-serve or communal food (such as lunch buffets, candy dishes, etc.…).

  - Self-serve or communal coffee pots, water dispensers/coolers, and microwaves from break areas and lunchrooms.

- ✓ Consider closing Fitness/wellness areas indefinitely.

- ✓ Consider establishing restroom controls:

  - Limit the number of employees in a restroom to two at a time.

  - If there are multiple urinals, block every other one to maintain physical separation.

  - Have sanitizing wipes available to wipe handles down when entering or exiting.

- ✓ Use sanitizer before and after touching any common surfaces. Periodic wipe down throughout day (i.e. mid-morning, mid-day, late afternoon) in communal areas.

- ✓ Develop modified emergency evacuation procedures to maintain physical distancing:

  - Request orderly and timely evacuation in a single-file while maintaining 6 ft of physical distancing.

  - Consider establishing multiple muster points for emergency evacuation plans to reduce concentrations of employees.

Employees Who Develop Symptoms of COVID-19

Employees who Develop Symptoms While at Home (during off work hours)

- ✓ Establish a policy for employees who develop symptoms of a common cold, seasonal allergies, Influenza/flu or COVID-19, consider the following guidelines:

  - **The employee should not come to the workplace** – they should remain at home while they determine their potential illness.

  - The employee should call their supervisor immediately to discuss their current health status.

  - The employee should immediately call their primary medical provider to discuss their health condition and follow instructions from their medical care provider.

  - Once the employee has called and discussed with their medical provider and a diagnosis has been established with a treatment plan, they should notify their supervisor.

  - An individual absence work plan should be developed on a case-by-case basis with each affected employee.

Employees Who Develop Symptoms While in the Workplace

- ✓ Develop a policy for employees to notify HR or other office management if they have developed symptoms during work and need to leave the workplace, consider the following guidelines:

  - Any employee or visitor who reports symptoms should be asked to leave the workplace and consult with their primary medical provider to discuss testing or a treatment plan.

  - Company leadership and Human Resources (HR) should determine if there was close contact with other workers or visitors (refer to the CDC for the most recent guidelines). Company leadership should take the following action if there was close contact with other workers or visitors:

- - Notify the affected employee(s) that they may have been in close contact with an employee who developed symptoms of COVID-19 who was asked to leave the workplace.

  - Notify other employers/contractors or visitors who were in your workplace that their employee may have been in close contact with an employee who developed symptoms of COVID-19.

- Consider having the employee obtain a doctor's release indicating they can return to work.

- Company Leadership and Human Resources (HR) should determine if further workplace actions are warranted (e.g. temporary partial or a full closure) for disinfection or possible quarantine of affected employees.

- Determine the areas that the affected employee was present in or may have been in contact with. Thoroughly clean and disinfect these areas following the CDC guidelines.

✓ Develop a Communication plan with all employees as appropriate, consider the following:

- Ability to occupy the workplace based on potential closure for disinfection.

- The date that the affected employee was last in the workplace.

- Locations/areas used or visited by the affected employee.

- Confirmation of notification of others who may have been in close contact with the affected employee.

- Confirmation that affected areas have been cleaned per CDC recommendations.

Cleaning & Disinfecting at the Workplace

✓ Provide hand sanitizer and wipes near common areas and high-touch surfaces. Promote employee use of these items before and after touching these surfaces.

✓ Establish a cleaning schedule to clean and disinfect common areas and high touch items at least daily or more following the CDC guidelines:

- Shared computer keyboard, touch screens, phones, plan tables, pens and other items, including locks, doorknobs, light switches, etc.

- Break areas and lunchrooms, including tables and chairs

- Restrooms including faucets, soap and paper towel dispensers, dryers, seats, and locks

- Copier and office equipment rooms/areas

- Elevators and stairways

- Empty garbage/trash containers and clean daily