RETURN TO WORK

VERSION 1.1

This documents presents issues and questions that should be considered as firms evaluate their return to work policies. It is intended as general guidance only and it is not intended to constitute legal advice and it should not be relied on as legal advice.

A recent study conducted by Edelman found that after health officials, employers are the most trusted source to handle and effectively respond to the coronavirus outbreak. And with many firms slowly starting to return to the office, The Council has prepared this guide of curated information, strategies and ideas on how to effectively make this safe return to work possible.

The research compiled is a blend of federal and state guidelines, lessons learned from international companies who have already re-opened their offices, as well as companies here in the U.S. who have already put together a process. Sources are cited throughout, as well as at the end of this document.

This guide is a living document and it will be updated regularly as we gain even more insights and information. You can find this Return to Work guide on <u>The Council's COVID-19 resource page</u>.

Contents

Determine *WHEN* returning to work is possible

FOLLOW CDC AND OSHA GUIDELINES

1. **See guidelines <u>here</u>**

2. **There are not yet specific OSHA standards around COVID, but there are some standard requirements that may apply to exposure prevention**
   - PPE standards, which are industry-specific
   - Ensuring a safe and hazard-free work environment

FOLLOW YOUR SPECIFIC STATE GUIDELINES

1. **See state specific information <u>here</u>**

2. **If you have a multi-state company, start with the strictest guidelines as your base, or adjust according to each state guidelines**

Decide *WHO* returns

SURVEY EMPLOYEES TO GAUGE THE INTEREST (AND WHETHER FEASIBLE) IN RETURNING TO WORK

1. **The most successful back-to-work companies have been transparent about employee concerns and communicate that health, wellbeing and safety is the highest priority**

CONSIDER OPTIONS

1. **Staggering shifts**
   - Arrange 20 minutes between shifts to allow for cleaning time
   - Require employees to wait in car or distance outside in between shift changes
     - Consider what to do in the event of inclement weather

2. **Open the office in waves – 20% of workforce returns for first two weeks, continue to broaden over time**

3. **Open the office for two days and Work From Home (WFH) the other three**

Create a detailed roadmap for *HOW*

1. **Decide which parts of the office to open**
   - Consider leaving some doors open with higher traffic
   - Determine best area for where security (and any possible health checkpoints) should be stationed

2. **How to deal with common areas**

   Cafeteria/lunchroom
   - Ask employees to pack lunches
   - If there's a cafeteria, provide boxed lunches or create a takeout environment

   Meeting rooms
   - No in-person (meaning 4+ individuals) meetings until after July 1 – subject to change
     - Mark Zuckerberg cancelled all in-person meetings through June 2021
   - Standing meetings
   - Continue virtual meetings for the foreseeable future
   - Allow time between each meeting for cleaning

   Storage room
   - Designate one person to access, manage stock, and distribute items

3. **New protocol for package and delivery**

   World Health Organization (WHO) on packages: "The likelihood of an infected person contaminating commercial goods is low, and the risk of catching the virus that causes COVID-19 from a package that has been moved, traveled, and exposed to different conditions and temperatures is also low."
   - But if concerned, use standard measuring of avoiding contact with your face and washing hands after handling.

   Consider designating one person to deliver mail to employee desk spaces before or after work.

4. **Implementing health checks**

   Testing options
   - Ask employees to temperature screen at home
   - Provide at-home test swab kits
   - Provide on-site testing – either temperature or thermal
     - Drive- thru options outside the office
     - Assembly line upon entering the office each morning or during shift changes

   Regulatory and contractual limitations to testing
   - For regulatory, if you are part of a multi-state firm, go with the most regulated state guidelines to set your standards

Create a detailed roadmap for *HOW*

- For contractual agreements, make sure you are aware of obligations and ensure you abide by them and/or make changes

Testing and Security

- Only collect what is needed – documentation is critical

- Cannot be stored under employment health insurance without employee permission

Potential limitations on employer testing: FEDERAL GUIDELINES

- **ADA:** General prohibition against employers conducting employee medical examinations – but seems open to authorization for COVID-19

- **CDC & state health authority guidelines:** Employers should immediately separate "sick" employees

- **OSHA guidance:** Employers should ID and isolate potentially infected individuals

- **HIPAA:** Privacy rules may apply if information is obtained from a health care provider or if it is aggregated with health claims information

What to do with test refusal and failures

- Have standards and be clear about those standards

    - An example, 100.4 is considered a temperature and will not be admitted into work

- If employee refuses required health screening, ask them to leave work, document the refusal

    - Permit return only by official documentation of a test or if they agree to your testing

How to return to work after home isolation

- WHO and CDC guidelines:

    - If no official test was taken to determine COVID-19 positive:

        - Must be fever-free for at least 72 hours; AND

        - Other symptoms improved; AND

        - At least 7 days passed since symptoms appeared

    - If official test is administered, return to work is permitted if

        - No fever; AND

        - Other symptoms improved; AND

        - 2 negative tests that are 24 hours apart

Create structure around how to deal with visitors and screening

DEEP CLEAN AND INSPECTION PRIOR TO EMPLOYEES RETURNING

1. **Order cleaning supplies**

- Make sure hand washing substance contains at least 60% alcohol

Create a detailed roadmap for *HOW*

- Look for EPA-approved disinfectants
- Have a 30 day supply of supplies

2. **Conduct HVAC and air filtration checks**
   - **Short term:** Extra air filtration if possible, keep windows open
   - **Long term:** Design building with higher quality clean air as new standard

CREATE A WRITTEN RESPONSE PLAN IN THE EVENT OF AN OUTBREAK WITHIN THE OFFICE

1. **Use federal/state/local/industry specific regulations as your base**

2. **What to include:**
   - Jobs that are deemed essential
   - Layout a plan for how to social distance
   - Have Work From Home (WFH) guidelines/expectations outlined for employees (ex: business hours of operations, mandatory video/conference call meetings, etc.)
   - Create a plan if someone in the office tests positive
     - Such as possible shutdown of office for 72 hours for deep cleaning
     - Self-quarantine for those who came in contact with the employee

DEVELOP ISOLATION PROTOCOL IF SOMEONE BECOMES ILL

1. **Including employees, customers, visitors, vendors**

2. **Clear instructions to employees on how to report and isolate if sick/showing symptoms**

3. **Assign a team of two individuals in the office to serve as coordinators in the event**

4. **Standard protocol should include:**
   - An isolation room
   - Create a direct route with visuals to guide people to the isolation room
   - The coordinators should first put on masks and gloves and then provide the ill individual with PPE
   - The coordinator should fill out a health form on behalf of the ill person
     - Sample COVID-19 Case Form Report for Employees/Visitors Presenting Symptoms at Work
   - Call local health authority for further guidance
   - Either send home or to the nearest health center (depending on recommendations from above)
   - If there's no public transport, either have person drive themselves or a have a coordinator drive.
     - If coordinator drives, disinfect car upon return.

Create a detailed roadmap for *HOW*

- Coordinators needs to ID everyone the person came in contact with at work and let them know (without releasing the name of the person) they were in contact with someone showing symptoms of COVID-19
- Location of isolation room: an exterior room or one away from the general population

SET UP A PANDEMIC RESPONSE TEAM

1. **Implement a cross-functional team including: shift logistic planner, protocol/guidelines lead, sanitation lead, communication and educational lead, visual lead, PPE lead.**

Create a detailed roadmap for *HOW*

CREATE A DAILY DISINFECTANT CHECKLIST FOR EMPLOYEES AND OFFICE AT LARGE

1. **Individual employees**

   • Workspace desk area

   • Any possible work barriers

   • Pens

   • Phone

   • Keyboard/mouse

   • Personal chair

2. **Office at large**

   • Kitchen

   • Meeting rooms

   • Appliances

   • Door handles

   • Common area chairs, tables, surfaces

   • Bathrooms

3. **Post documentation of when common spaces are cleaned**

PREPARE the building

THE OFFICE

1. **Create six feet around desk space**
   - Tape floor around desks to ensure six feet
   - Plexiglass shields between workers if less than six feet apart

2. **Avoid face-to-face layouts**

3. **Tape arrows on the floor to ensure it's a one-way, clockwise lane**
   - Already implemented by hospitals and grocery stores

4. **Paper desk mats that are discarded after each day**

5. **Supply personal trash cans, tissues, hand sanitizer**

6. **Space out and/or remove chairs in meeting rooms**

7. **Remove collaborative tools such as shared pens, whiteboard markers, conference phones**
   - Encourage individuals to bring their own materials or assign individuals to previously shared items

8. **Voice controls over touch screens**
   - The use of Alexa is popular in the home and may become the next big ticket item for office use

STORAGE AND LOCKER AREA

1. **Provide alternative storage for individualized use**

2. **Consider individual coat hooks rather than a coat room**

3. **Limit access to only individuals who need it**

4. **Provide additional shelving/storage in larger common space to avoid cluster of people**

5. **Supply Room – designate one individual to deliver supplies to employees**

CAFETERIA, LUNCHROOM, BREAKROOM

1. **Designate specific time blocks for employees to take breaks and lunch**

2. **Can rotate the schedule weekly**

3. **Limit and space out chairs**

4. **Place visuals signage on tables/chairs to ensure social distancing**

# *PREPARE* the building

5. **Visual signage for break room and common area capacity**

6. **Separate breaks and lunches by 10+ minutes to have sanitation crew wipe down all surfaces, tables, chairs, kitchen appliances, door handles, etc.**

BATHROOMS

1. **Consider hiring a bathroom attendant to ensure distancing and cleanliness**

2. **Implement maximum capacity**

3. **Touchless doors**

4. **Touchless sinks and soap dispensers**

5. **Touchless hand dyers and paper towel dispensers**

6. **Post hand washing signs**

7. **Provide materials for employees to sanitize anything they touched**

ELEVATOR

1. **Tape spots on elevator to ensure proper spacing**

2. **Encourage employees to take the stairs when possible**
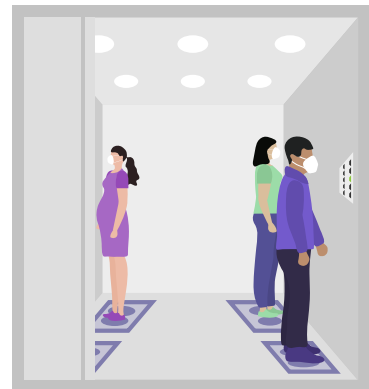
Prepare the *WORKFORCE*

1. **Encourage employees to stay home if sick**
   - Do not require doctor notes
   - Maintain flexible Work From Home (WFH) policies
     - Mark Zuckerberg told all Facebook employees who are in vulnerable positions (i.e. no childcare) that they should plan to WFH through the summer

2. **Provide welcome back kits containing PPE equipment**
   - Mask, sanitizer, tape measure, marking tape, wipe, thermometers
     - Ask employees to wear masks when six feet distancing is not available
   - Consider supporting local businesses

3. **Social distance etiquette within the office**
   - Use the CDC six feet recommendations as an opportunity to remind employees of discouraging piggybacking or tailgating through security access points and require 100% of employees to use their key card when going through the checkpoints
   - Do not hand objects to each other. Set objects down and pickup at safe distance

4. **Non-essential travel**

5. **Implement clean desk policies**
   - Another area employers can use both as security and health requirement. Ask employees to clear desks of paper and laptops at the end of each day and wipe down their space and technology

6. **Transportation**
   - Recommend private transportation only
     - Private car, bicycle, scooter

COMMUNICATE, communicate, communicate!

1. Be transparent and open about what is going on. Adjustments will need to be made!

2. Keep in mind that after health officials, employers are the most trusted source to handle and effectively respond to the coronavirus outbreak

3. <u>69% of Americans trust their employer to respond to the outbreak responsibly</u>

4. <u>43% of employees want daily updates about the virus from their employer; 20% want several updates per day</u>

SOURCES

OSHA - Guidance on Preparing Workplaces for COVID-19

LEAR Safe Work Playbook

CIAB State Tracker

Cushman & Wakefield - Recovery readiness: a how-to guide for reopening your workplace

Crowell Morning - An Employer Checklist for Re-opening

***Protocol* - 'Needle in a haystack': Reborn tech offices may need distance and mass testing**

***Fast Company* - Our offices will never be the same after COVID-19. Here's what they could look like**

Willis Towers Watson - 10 key safety considerations for employers, now and after COVID-19

***Bloomberg* - What Returning to Work Will Look Like in Offices, Cafes and Factories Around the World**

***Vox* - This is the end of the office as we know it**