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Safe Actions For Employee Returns



Return-to-Work Guidance for Public Operations

To apply broadly to public gathering spaces,
sports facilities, houses of worship

What is covered in this document:

- Physical Considerations
- Medical Health Considerations
- Stress, Emotional & Mental Health Considerations
- Employment, Legal & Human Resources Considerations
- Communication Considerations
- External Considerations



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Physical Considerations

Preparing the physical workplace for return to work

A major consideration every organization should evaluate before issuing a return-to-work order are the practices they have adopted to promote a safe physical environment for workers. Employers should develop procedures for building maintenance and care, maintaining physical distance, and mitigating risks for employees who need to perform work in public environments that are outside of the organization's control.

What is covered in this document:

- Buildings, Facilities and Operations
- Physical Distancing
- Public Workspace Risk Management



Buildings, Facilities and Operations

Although many employers have had to carry on essential work operations in their facilities despite shelter-in-place restrictions, these businesses and others will have employees returning to physical environments that need to be adequately prepared for infection control and physical distancing practices. Employers should consider the following actions when preparing physical spaces for a return to work:

- Schedule a full sanitization of the facility and equipment prior to returning employees to work (consider there may be a required inspection audit or proof of full sanitization by local authorities before a facility may be allowed to re-open)
- Assess the space to determine the maximum capacity possible when occupants maintain the advised distance from each other; then monitor the number of people occupying that space to ensure the maximum is not exceeded
- To reduce touch points, install motion-detection sensors in place of switches where possible
- Conduct a formal assessment for determining areas (e.g., rooms, gathering areas, areas dedicated to critical or essential workers, etc.) that can be closed off that are not needed to do business, and then close access to them
- Classify worker exposure to COVID-19 (i.e., **OSHA's Occupational Risk Pyramid**) in order to determine and implement control measures
- Consider installing hands-free arm-pull or foot-operated door openers where possible
- Develop site cleaning guides and frequency (e.g., hourly, twice per day) that specifically address heavy usage areas (e.g., restrooms, elevators, onsite gyms/exercise rooms, elevator buttons, door handles), cleaning chemical inventories, secondary containment training and labeling and training for proper disinfection techniques (e.g., disinfecting incoming equipment for service centers)
- Inspect core building infrastructure including HVAC, water systems, and plumbing to appropriately flush the systems and install new filters, etc.
- Inventory, procure and store Personal Protective Equipment (PPE) needed based on worker risk exposure
- Train and post signage for proper PPE usage, identification (e.g., face shield for grinding operations versus plastic barrier for screening), etc.
- Develop process for procurement and storage of hazardous materials (e.g., hand sanitizer, cleaners, disinfectants)
- Develop a workplace reconfiguration plan that takes physical distancing requirements into account, including occupancy limits for areas, workstation repositioning and common areas

Buildings, Facilities and Operations (cont.)

- Develop and deploy site pre-check assessments and readiness audits prior to reintroducing employees
- Provide resources to temporary workers in terms of training and safety and health protections, including providing PPE (see https://www.osha.gov/temp_workers)
- Establish protocols for proper disposal of face masks, gloves, and other disposable PPE worn during work shifts
- Establish protocols for proper cleaning, disinfection and storage of PPE if it is able to be reused
- Develop, implement and monitor a training program to ensure employees wear PPE properly
- Develop a plan for the safe restart of site assets and equipment including restart procedures, equipment maintenance audits, and preparation checks
- Develop and implement a COVID-19 inspection checklist to ensure that compliance to the physical conditions requirements are met

Physical Distancing

Once employees have passed entrance screening, there are still potential risks inside of a workplace that can be at least partially mitigated through physical distancing protocols. Employers should consider the following actions to promote and encourage appropriate physical distancing in the workplace:

- Facilitate use of individual rather than collective transport to limit possible exposure
- Use visual cues and signage that encourage physical distancing
- Recommend conducting formal risk assessments for determining the most reliable physical distancing recommendations (i.e., using the hierarchy to decide on controls), especially in high-risk or out of process activities
- Designate separate entrances and exits for buildings and rooms, if possible, and provide directional signage for traffic flow along with physical distancing reminders/cues (e.g., maintain six feet, one-way pedestrian traffic flow, floor markings)
- Ensure proper distancing between visitors in seating areas by requiring patrons to site in every other seat and/or alternate rows of seating
- Provide a separate seating area for vulnerable populations
- Support policy, training, signage, etc. with enforcement of physical distancing (e.g. verbal warning, corrective action, etc.)

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Physical Distancing (cont.)

- Designate increments of acceptable physical distance on floors where lines might form (e.g., entrance to building, restrooms, etc.)
- Identify physical bottlenecks where physical distancing is more difficult and implement plans for alleviating bottlenecks (e.g., restrooms, corridors, stairwells, elevators)
- Develop protocols for use of confined spaces like elevators (e.g., limit capacity to 2-3 people, guide employees on how to position themselves in elevators, etc.)

Public Workspace Risk Management

In certain cases, employees may have to conduct work in a public environment or an environment outside the direct control of their organization. To mitigate risk to the employee, and to mitigate risk to the public, employers should consider the following actions:

- When possible, set an extended perimeter around a workspace to place adequate distance between the worker(s) and other individuals
- Ensure employee vehicles (owned by the employer) always have sufficient levels of necessary COVID-19-specific PPE (e.g., masks, gloves, etc.)
- Provide training to all employees how to operate safely in public spaces or environments outside the direct control of the organization
- Advance communication with external sites to discuss and confirm that COVID-19 guidelines (e.g., physical distancing, etc.) are being followed to the best of the external site's ability
- When possible, advance communication as to whether individuals at the site have recently been confirmed positive
- Provide a method for employees to request additional PPE
- Provide a method for employees to report unsafe behavior by fellow employees or exposure-related incidents (e.g. forced to be near an individual showing symptoms of an illness)
- In lone worker scenarios, provide a direct line of communication with the company in case of sudden illness or emergency situations
- Implement policies to limit the number of workers needed to be present to carry out any tasks off of company-owned property without compromising the safety of employees

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Medical Health Considerations

Protecting the health of workers before and after returning to the workplace

Prioritizing the physical health of workers as they return to the workplace is key to protecting their physical safety. Employers should develop procedures for monitoring and promoting the medical health of the workforce, ensuring appropriate physical distancing, and encouraging overall good hygiene and infection control practices. For additional information visit the World Health Organization website at <https://www.who.int/emergencies/diseases/novel-coronavirus-2019>

What is covered in this document:

- Screening and Reporting
- Responding to Medical Health Concerns
- Hygiene and Infection Control



Screening and Reporting

In order for employees to return to a workplace, many organizations may institute screening (through self-assessments and temperature checks) to clear employees for entry into a building or site. While these screening methods are not foolproof measures to detect COVID-19, organizations should consider the following actions:

- Provide written communication and/or webinars to inform employees how, when and where screenings will be conducted and what will happen should an employee have an elevated temperature or provide a high-risk answer to a screening questionnaire
- Engage safety committees in assisting with creating guidelines
- Outline and make employees aware of the procedure for failed COVID-19 screenings
- Ensure mechanisms are in place to track and understand completion and engagement metrics around screening communications and training
- Create guidelines for supervisors and managers in the event of a failed screening and ensure the employee has transportation and a place in which to shelter/self-isolate
- Establish a process, including speaking points, for communicating to employees who have been in contact with a symptomatic employee (e.g., what steps occur as a result, self-quarantine, area closed for deep cleaning, etc.)
- Draft talking points for supervisors and managers to inform employees about a confirmed case in a calm, informative manner
- Communicate exposure information and screening results with third-party employers, such as staffing companies providing temporary workers, in a timely manner
- Help employers conduct needed public-health oriented measures (e.g., temperature checks) while also following HIPAA regulations for health data/information
- Develop self-screening procedures for a dispersed workforce that reports to job sites, but not a company central location
- Implement signage and other hazard controls in entrance screening cueing areas (ensure that cue is protected from adjacent vehicle traffic)

Responding to Medical Health Concerns

In the event that an employee fails a screening process (e.g., registers a fever, tests positive for COVID-19) and/or exhibits symptoms related to COVID-19, employers need to be ready to respond and should consider the following actions to address medical concerns:

- For employees of public space facilities:
 - Develop, communicate and train employees on entrance screening protocol including temperature checks and response protocol for failed screenings while following EEOC guidelines for HIPAA compliance
 - Consider, when possible, reliable temperature measurement and monitoring systems that require minimal operator intervention or that work as a standalone hands-free self-service system
 - Identify screeners and protocol for screener safety (e.g., appropriate PPE) and tracking of temperature checks or health assessments
 - Develop COVID-19 medical reporting protocols for workers that develop symptoms
 - Set up an isolation room and associated protocols including required equipment and procedures for entering/exiting and transportation guidelines
 - Dispense PPE to symptomatic workers and place in isolation
 - Document and track failed screenings for contact tracing and arrange transportation home for workers denied entry
 - Develop protocol for reporting positive test results to appropriate public health authorities as needed
 - Provide self-quarantine guidelines for workers who fail screening, check-in with them regularly and develop protocol for post-quarantine return to work
 - Develop, communicate and train all employees on protocols in the event of a colleague exhibiting symptoms
 - Establish disposal procedures and necessary equipment for PPE that will no longer be utilized (e.g., spent face coverings, gloves, respirators)
- For visitors/patrons of public space facilities:
 - Encourage visitors and patrons to perform a self-assessment before arriving to the public space facility, and to stay home if they feel ill or are exhibiting symptoms of COVID-19
 - Provide communication to inform visitors of entrance screening protocol and the protocol for failed screenings

Hygiene and Infection Control

Employers should strongly encourage their employees to practice good hygiene and infection control. They should also provide ample opportunity for workers to engage in proper hygiene practices. Specifically, employers should consider the following actions to promote workplace hygiene:

- Require workers to stay home if they feel sick and if an onset of symptoms develop while at work, report it immediately (communicate any changes to sick time policies, like previous requirements for a physician's note when out more than a certain number of days)
- Develop protocols for employees who feel sick or develop symptoms of COVID-19 while traveling for work
- Encourage frequent hand washing and make hand sanitizer available in several locations, especially near common touchpoints
- Train and post signage about proper hand hygiene techniques in washrooms and break rooms
- Provide adequate amounts and locations of tissues, no-touch trash cans, soap and alcohol-based hand sanitizer
- Consider installing hands-free arm-pull or foot-operated door openers in restrooms and for other heavily trafficked doors
- Encourage proper respiratory etiquette including covering coughs and sneezes with either a tissue or coughing into a sleeve (encourage wearing a face mask if deemed necessary and appropriate)
- Provide training and information on proper disinfection techniques for shared spaces and objects (when unavoidable)
- Consider extending cleaning services (or develop a cleaning checklist) to include shared company vehicles, where applicable
- Consider strategically placing branded visual signage as a straightforward approach to remind people how to reduce their risk (i.e., with a focus on high-risk areas)
- Explain the difference between cleaning and disinfecting

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Stress, Emotional & Mental Health Considerations

Providing employees the support needed to return to work

The safety and physical health of employees is top of mind for organizations as they look to reopen workplaces and have workforces return. Another set of considerations for employers must be the mental health and mental wellbeing of their employees. Employers must consider how they intend to allay the concerns, anxieties and uncertainty that workers may feel about their lives, jobs and the future of the organization when returning to work. Mental health distress and mental health conditions may continue to impact employees' return to work and their ability to safely focus on the job at hand.

Below are several factors for employers to consider regarding employee emotional and mental health when drafting overall plans for returning to work and full operations. Having employees know their employers are supporting them through these difficult times can make a significant difference for their mental and physical health. Buy-in and engagement from leadership, management, human resources, communications and employees themselves is critical for success.

What is covered in this document:

Resources for Leadership and Supervisors
Resources Human Resources
Education and Awareness Topics



Leadership, Supervisors and a Culture of Mental Health Safety

Leadership, supervisors and other managers have an essential role in addressing mental health impacts from COVID-19. Leading by example and building a culture of mental safety are critical. Building mental, emotional and psychological safety into every process (communications, trainings, etc.) builds resilience in the workforce.

Though employers may be working with limited resources and a limited workforce, prioritizing stress and mental health initiatives has immediate and long-term positive impacts. Poor mental health and stressors at the workplace can be a contributory factor to a range of physical illnesses like hypertension, diabetes and cardiovascular conditions, burnout, and financial impacts from increased absenteeism, negative impact on productivity and profits, as well as an increase in healthcare costs.

- Recognize that stress and mental distraction can pose great hazards to worker safety, and take extra precautions for workers performing high-risk tasks
- Provide support and information about reducing social isolation while working remotely
- Provide support and information for employees anxious about leaving the relative safety of quarantine
- Provide training for all leadership, supervisors, and employees on recognizing the signs of stress and how to create a culture of support and trust
 - Ensure leadership and supervisors understand and validate the stress and other mental health distress issues an employee may be experiencing
- Increase connecting with employees as they continue to work remotely, continue to work on-site, or return to working on-site. Location of work (remote versus on-site) will affect the modality of checking in; however, frequent check-ins are important.
 - If there is interest, consider creating peer-led initiatives (e.g. slack channels, support groups). Provide training for peer leaders on moderator skills, handling sensitive topics, and more.
- Lead by example – demonstrate, encourage and support a work and home life balance while working remotely. Working from home or working remotely can challenge the balance of these structures; discuss with HR and supervisors how to be role models and support healthy habits while working from home
- Train supervisors and other leaders on how to address “hot topics” such as:
 - An employee tested positive for COVID-19 and coworkers are anxious about their return to the workforce
 - Strong reactions, fears and anxieties related to the COVID-19 pandemic (e.g. fears of contracting the virus, strong political opinions, opinions on re-opening, etc.)

Human Resources

Employers have a unique ability and responsibility to manage their relationship with benefit providers, such as Employee Assistance Programs (EAPs) and health insurance plans to ensure workers have access to the help and support they need. Human Resources teams and supervisors can help make this difference a reality.

When developing policies, consider a tiered approach. While members of the workforce may be experiencing mental health distress and not have a diagnosable mental health disorder, at least 20% of the working-age population has a diagnosed mental disorder and 5% of the population has a severe mental health disorder diagnosis. While it is not the responsibility of an employer or supervisor to diagnose mental health conditions, ensuring benefits and policies recognize that differing levels of care are needed is critical to ensure treatment.

Assess Internal Resources

- Evaluate if health benefits are adequate and conform to parity requirements under the law
- Evaluate if EAP resources are adequate; if not, address identified gaps either with EAP or with other resources (e.g. if your EAP does not offer virtual support options, identify some within the community or your organization's healthcare plan to share with employees)
- Communicate the "how" of navigating healthcare benefits and EAP services – for employees in distress or employees who have not used these benefits before, not knowing how to navigate resources is a barrier to accessing them

Connecting Employees to Mental Health Resources

- Encourage EAPs and health insurance plans to be very active in promoting their telephone and online counseling services through various communications, campaigns, etc.
- Consider establishing a peer advocates group that involves front line workers, union representatives, and others to foster communication and reduce stigma about seeking help for stress, emotional, and mental health concerns
- Consider establishing a mental health taskforce with management representation from all functional areas. Provide training on how to spot the signs of mental health issues, approaches for handling or starting a conversation with an employee who is exhibiting signs, and consider having an identifier worn or used by every member of the taskforce so employees can easily identify who they can speak with should they want to do so

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Human Resources (cont.)

Communicate Your Resources

- Communicate frequently to reassure employees they can get help for any kind of problem, and promote a culture that normalizes seeking support
- Consider using mobile and digital tools to provide company resources to employees
- Repeatedly share all the resources provided by your benefits providers and local community programs
- Provide easy links to national support hotlines, including but not limited to:
 - [National Suicide Prevention Lifeline](#)
 - [Childhelp National Child Abuse Hotline](#)
 - [The National Domestic Violence Hotline](#)
 - [Eldercare Locator](#)
 - [National Sexual Assault Hotline](#)
 - [Find a Health Center](#)
 - [211.org \(multilingual resource to connect to local crisis and emergency services\)](#)
 - [Aunt Bertha Resource Database \(multilingual resource to connect to reduced-cost social services\)](#)
 - [SAMHSA National Helpline](#)
 - [Crisis Text Line | Text HOME To 741741 for free 24/7 Crisis Counseling](#)
 - [National Alliance on Mental Illness \(NAMI\): Find Support](#)
- Provide information about where to access self-screening assessments, for example:
 - [Mental Health America Self Screening Tests](#)

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Human Resources (cont.)

Adjust and communicate appropriate HR policies and resources

- Allow for flexible policies as schools restart, daycares reopen and schedules become reestablished
- Ensure the EAP offers financial counseling and support to help employees manage financial stress
- Ensure the EAP offers counseling for substance misuse, fatigue, family stress and general mental health support; if counseling cannot be provided by the EAP, ensure policies allow for increased need for off-site counseling
- Allow for flexible policies as employees receive elective and routine medical care that may have been postponed due to the pandemic
- Allow for flexibility of employees to utilize paid time off to spend time with family or loved ones they were physically separated from during quarantine to help restore their connection with others, reduce stress, and regain a sense of normalcy
- Provide a confidential helpline or email address for employees to get help accessing personal resources and treatment privately
- Provide a confidential helpline for employees to raise job-related concerns anonymously
- Be ready to provide assistance or links to local/county/state/national resources on common employee concerns, such as applying for unemployment, food insecurity, childcare, etc.
- Provide support for counseling for employees who test positive or develop COVID-19 or lose a loved one due to COVID-19

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Education and Awareness

An educated workforce can better protect themselves from the impacts of mental health and stress related to COVID-19. Consider building a robust education and awareness plan that ensures employees are aware of these impacts, aware of workplace resources, and know they are supported.

Communicating on these topics in small, easy to understand pieces of information is encouraged, as is sharing on multiple channels (e.g. posters, infographics, social media, brown bag lunch, email communications, communications from leadership, etc.).

- Provide workers with education and opportunities to practice practical ways of reducing stress, such as mindfulness training, deep breathing exercises, yoga, and other forms of self-care
- Educate all leadership, supervisors and employees on:
 - Understanding the impacts of COVID-19 on stress, mental health and substance use
 - Recognizing the signs of impairment, substance misuse or mental health distress
 - How to engage in mental health first aid and suicide prevention efforts
 - How to refer employees to other resources and support (internally and externally; see above list for suggested national resources to share)
- Other specific topics an employer may want to include over the next several months are:
 - Mental health 101 – understanding mental health disorders and the brain
 - Addressing the stigma surrounding mental health disorders
 - The relationship between mental health and risk for developing a substance use disorder
 - Industry-specific topics

Other Considerations

- For those working in essential or high-risk industries, employees may need elevated levels of support and services, both now and over the coming months. Other vulnerable populations (those with previously diagnosed mental health conditions or substance use disorders) may experience magnified or different impacts. COVID-19 impacts may also manifest as an increase in rates of substance use in the workforce. Remember that building mental, emotional and psychological safety into every process (communications, trainings, etc.) builds resilience in the workforce and that each employee will experience this differently.

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Employment, Legal & Human Resources Considerations

Preparing the workforce to transition back to the workplace

A major consideration beyond the protocols to address the physical, medical, emotional and mental issues of reopening the workplace is the cumulative level of change that employees have experienced over weeks and months. Workers will undoubtedly have many questions and/or anxieties about transitioning back to a physical work environment, in terms of both their safety and health as well as disruption to what has become the “new normal” of sheltering in place and/or working from home. Employers need to proactively identify potential problems and solutions. Cross-functional partnership at the leadership level will help ensure the workforce is physically and psychologically prepared to return.

What is covered in this document:

Policies and Procedures
Management of Change



Policies and Procedures

Because of the pandemic, organizations likely allowed for flexibility in some work policies, which may require further adjustment upon return to a physical workspace. Actions surrounding these types of policies and procedures include the following:

- Confirm work status (e.g. active, working extended hours, working from home, on leave or furlough, change in hours, change in pay)
- Determine essential roles and protocols around a phased re-introduction of workers
- Review employment actions based on business need (furlough/layoff, hour/pay change)
- Review workers' compensation procedures as related to COVID-19
- Assess employee travel policies, who is eligible to travel, and ways to track if employees are visiting a region/city where there are outbreaks or risks of exposure
- Consider reporting policies and mandatory 14-day quarantine for employees who travel for personal reasons (e.g. vacation) to high risk regions/countries
- Review work from home policies and provide instructions and tools for ergonomic setups
- Assess leave and PTO policies
- Review infection detection and reporting procedures and methods for tracking
- Develop a plan to reintegrate employees who have recovered from COVID-19
- Navigate the concerns for higher risk populations or consider how to phase in high-risk employee profiles (e.g. over 50 years old, known medical conditions that are at higher risk) following EEOC guidance on protected classes
- Resolve potential liabilities (e.g., work from home flexibility vs. return to work requirements, access to professional development for work from home employees, etc.)
- Consider allowing employees, where possible, to wear personal face coverings at work (check with applicable local and state requirements)
- Review reasonable accommodation program guidelines

Management of Change

Most employees will likely expect there to be changes in policies, protocols, and even the physical workspace following the pandemic shutdown. The following actions may be considered to reduce anxiety about returning to work and ensure that employees know what to expect:

- Maintain timely and frequent communication with employees about policy and design changes
- Cross-train workers to perform essential functions so the workplace can operate even if key workers are absent
- Solicit open feedback on challenges and take action, as appropriate, while communicating back to the employee explaining the rationale as to why or why not action was taken
- Convey in detail why certain protocol and design changes were adopted
- Provide virtual work support to encourage continued virtual collaboration
- Engage in virtual training to introduce employees to new protocols and patterns of behavior before they return to a physical workplace and ensure a method for acknowledgment that the training has been completed prior to returning to the workplace
- Develop training/procedures with how to handle unruly/non-compliant visitors/customers
- Inform and train employees in any new organizational roles and responsibilities that have been instituted as precautionary measures against reinfection
- Develop cross-training plans for potential fluctuation in the workforce (i.e., employees out for quarantine periods) to ensure business continuity, and communicate appropriately to help employees understand why
- Develop a process to effectively track employees who may be out for an extended period, and their tentative return dates for continuity purposes
- Develop plans for crucial leadership continuity should leaders be impacted and out of office due to COVID-19.
- Create a web page for employees dedicated to COVID-19 (e.g., internal memos, pay codes, EAP/HR links, etc.) and keep it updated

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Communication Considerations

Ensuring effective and timely communication to facilitate return to work

Effective, timely and frequent communication is necessary to create the shared sense of safety and security among a workforce and ease the process of returning to work. In addition to including the details of the transition, a communications plan should anticipate employee concerns and questions. The right communication tactics can exhibit enhanced caring from leadership and help employees practice better awareness of their surroundings for physical distancing and more. Below are several factors for organizations to consider when developing a comprehensive change management communications strategy.

What is covered in this document:

Instructions for Arrival
Personnel and Policy Changes



Instructions for Arrival

In order for employees to return to a workplace, many organizations may institute screening (through self-assessments, symptom checks and temperature checks) to clear employees for entry into a building or site, in addition to other new entrance policies. Communication should be explicit and clear so employees know what to expect when arriving back on site.

- Outline new entrance protocols for employees and visitors, including how, when and where screenings will take place (may need to be mailed to employees that do not have email addresses)
- Consider using simple, branded, visual signage as a straightforward approach to remind people to reduce their risk or let visitors know what your organization is doing
- Conduct demonstrations or training to introduce new behaviors to employees in anticipation of arrival back on site
- Provide instructions for bringing work equipment back into the facility and sanitizing items
- Alert employees to changes in the work environment (e.g., availability of meeting rooms, occupancy restrictions, relocation of work stations, etc. to allow for physical distancing)
- Describe how the facility or site was prepared for arrival of employees (e.g., cleaning and disinfecting)
- Leverage multiple communication channels to reach the audience including phone, app-based, video (e.g., Skype, Zoom), verbal, digital displays, speaker systems, flyers, posters, email and postal mail

Personnel and Policy Changes

Because of the pandemic, organizations likely allowed for flexibility in many work policies, all of which will have to be reassessed upon return to a physical workspace. To guard against subsequent waves of the virus, and to be better prepared for similar events, organizations will likely create new roles and responsibilities for individuals. The following are some actions for communicating this information:

- Describe why certain groups or individuals were chosen to return to work, if using a phased approach
- Explain the rationale behind the creation of new roles/positions within the organization for handling the coronavirus
- Outline the new responsibilities for existing roles to ensure health and safety in the wake of the pandemic and how employees are expected to engage with the new roles
- Convey in detail why certain protocol and design changes were adopted
- Explain the benefits of returning to a shared work environment (e.g., increased productivity and innovation, access to shared equipment and network)

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External Considerations

Raising awareness of the outside influences that can impact operations

As employers work to develop comprehensive continuation and/or return to work plans, changes in environmental and societal conditions outside of one's organizational control will need to be continually considered. As part of their efforts to address COVID-19 precautions, employers should develop protocols that can be adjusted based on external needs and shifts in policy, medical guidance and overall levels of community risk. These must be flexible and should be relative to city, county, state, and federal guidelines and levels of risk (e.g. infection growth rate, population density), which may vary greatly in organizations with large footprints. By doing this, organizations can set themselves up for continued safe operations without needing to create new protocols in response to external influences.

What is covered in this document:

Government Policies and Guidelines
Community Risk
Framework for Levels of COVID-19 Response Protocols



Government Policies and Guidelines

An important consideration for return to work protocols is adhering to federal, state and local jurisdiction requirements for business operations and public interactions. Although federal executive orders mainly revolved around travel restrictions in and out of the country, the range of state by state and local jurisdiction mandates are wide. Therefore, employers should consider the following actions to keep up with changes in government policies related to COVID-19:

- Identify primary sources for government policy information (e.g., CDC, NIOSH, OSHA, National Governors Association, etc.) as well as sources for relevant state and local jurisdictions (e.g., county, township or city level ordinances)
- Regularly check for updates to government policy primary sources and assign responsibility for monitoring updates to a specific team or employee
- Designate a point of contact to be a spokesperson for all communications and updates for COVID-19
- Consider the use of technology to assist in tracking policy information and regulatory changes and ensuring policy alignment and compliance
- Communicate any changes to organizational policy as a result of government mandates clearly and concisely to affected workers before and after policy change implementation
- Establish a system for tracking any required reporting data to government bodies, landlords or property management, and key corporate stakeholders

Community Risk

Because the coronavirus pandemic does not affect all locations equally, it is vital for employers to consider the specific exposure risks for the communities into which employees are returning. Therefore, employers should consider the following actions to keep their return to work protocols appropriate and safe for the communities in which they are operating.

- Monitor the number of confirmed COVID-19 cases in the community to assess for potential interaction of employees with confirmed cases to determine exposure risk
- Determine organizationally how community infection rates will impact self-assessment of exposure risk (e.g., very high, high, medium, low per **OSHA guidelines**) and put a plan in place for triggering any protocol changes based on local community spread
- Communicate any changes to organizational policy as a result of changes in community risk exposure clearly and concisely to affected workers before and after policy change

Framework for Levels of COVID-19 Response Protocols

To keep from creating new protocols from scratch in the face of changing external factors, employers should consider developing a phased or leveled approach to their return to work protocols. Although it is difficult to predict the state of the world in the future, employers who consider a leveled response will have a better chance at adapting to new restrictions efficiently with fewer pain points for their employees. Although the number of levels may vary for different organizations (e.g., full pandemic restrictions vs. limited pandemic restrictions vs. mission critical operations vs. new normal operations) the following aspects of the different levels should be considered:

- Identify who will determine the tolerable level of organization exposure risk for each level of operation and be prepared to shift levels based on risk exposure by performing a risk assessment
- Consider health and safety protocols appropriate for each level of operation (e.g., cleaning protocols, vulnerable risk groups, physical distancing, hygiene requirements, entrance screening, trace testing, critical workers who can't socially distance)
- Consider travel and meeting protocols appropriate for each level of operation (e.g., virtual vs. in-person meetings, mission-critical travel vs. opportunistic travel, site visitors)