COVID-19: WORKPLACE RE-ENTRY CHECKLIST

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Businesses should devise a multi-faceted and phased approach to the workforce’s re-entry to the workplace, which takes into account guidance, regulations, and orders issued by federal, state and local governments and agencies, including the World Health Organization (WHO), the Centers for Disease Control and Prevention (CDC), the Equal Employment Opportunity Commission (EEOC), the Occupational Safety and Health Administration (OSHA), and The White House.

Consider establishing a cross-functional COVID-19 Task Force, with representatives from across the organization, including human resources, legal, and facility operations, to prepare and monitor the re-entry of the workforce, as well as the evolving circumstances surrounding COVID-19. This checklist provides an overview of some of the key considerations the COVID-19 Task Force should consider when developing the organization’s plan for the workforce’s re-entry to the workplace.

This is general guidance only. Be sure to consult legal counsel, public health information, and all applicable executive orders, as required policies and practices may vary based on state and local laws.

PREPARE THE PHYSICAL WORKSPACE

✓ Establish cleaning protocols that adhere to CDC guidance.
✓ Post building cleaning protocols throughout the workplace.
✓ Post CDC recommended personal hygiene protocols reminders.
✓ Identify and consider hands-free alternatives to high-touch areas, such as revolving doors, knobs, light switches and plumbing fixtures.
✓ Conduct maintenance and updates to HVAC and building facilities by, for example, increasing ventilation and installing high-efficiency air filters.
✓ Modify workspaces to promote social distancing by, for example, creating smaller offices or installing higher walls between cubicles or other physical barriers between workspaces, such as clear plastic sneeze guards.
✓ Close or limit access to common areas, such as gyms, kitchens and cafeterias, or reconfigure to promote social distancing.
✓ Provide and maintain supply of personal protective equipment (PPE), sanitizers, and disinfectant wipes for employees and building guests.
✓ Restrict the total number of permitted building occupants in order to allow for social distancing.
✓ Place decals and space demarcations in common areas, such as the lobby, to note social distancing requirements and traffic flow patterns.
✓ Reconfigure meeting rooms to promote social distancing.
✓ Control all points of entry for staff, guests, and vendors.
✓ Remove and discourage the use of shared tools, such as remote controls and conference room phones.
✓ Establish and communicate building rules with employees and building guests.

EMployee preparedness and Policies

✓ Explore feasibility of workplace policies and practices that promote social distancing, such as encouraging continued telecommuting and staggered shifts.
✓ Consider whether school and daycare facilities are open.
✓ Consider availability of reliable and safe public transportation.
✓ Consider beginning reentry with employees whose positions are best performed in the workplace.
✓ Create a staff travel policy, and consider restricting all non-essential travel.
✓ Require employees to stay home if they are sick, and ask any employee who stays home sick if they are experiencing symptoms of COVID-19.
✓ Ensure the privacy of each employee who makes a COVID-19 report within the workplace.
✓ Consider whether to conduct daily contactless temperature checks on employees and building guests before permitting entry to the building, and whether to hire a trained medical professional to conduct the checks.
✓ Establish and communicate protocol for employees to report if they have been diagnosed with COVID-19, are experiencing COVID-19 symptoms, or have been exposed to COVID-19.
✓ Establish employer responsiveness plan to address reports of COVID-19 within the workplace, while keeping the identity of the individual confidential, to include sending the employee home immediately, cleaning and disinfecting the workplace, and informing others who have been in contact with the employee of potential exposure
✓ Update and communicate changes to personnel policies based on COVID-19 related laws, such as Families First Coronavirus Responsiveness Act, and post all required employee notices in conspicuous places and on the employee intranet.
✓ Consider whether to require employees and guests to complete a health certification prior to re-entry to the workplace affirming that they have not been experiencing COVID-19 symptoms within the past 14 days, and if previously tested positive, that their symptoms have resolved and have tested negative in accordance medical guidelines.
✓ Limit in-person meetings, including the permitted size of in-person meetings.
✓ Limit building guest access, and restrict outside meetings and events in the building.
✓ Establish a policy regarding employee participation in meetings and events outside the building.
✓ Continuously monitor for local outbreaks, and develop a plan in the event of an outbreak.
✓ Prepare to manage leaves of absences under federal, state and local laws.
✓ Review lease agreement, and coordinate with property manager regarding their plan for maintenance and upgrades to building infrastructure and protocols in response to COVID-19.
STAFF PREPAREDNESS AND TRAINING

- Train employees on proper sanitation and prevention techniques, including proper use of PPE and when and where PPE is required.
- Clearly set employee expectations in advance of their return to the office, with a strong emphasis on employee value, safety, and security.
- Train employees on how to safely get to and from the office.
- Encourage contactless interactions through the increased use of technology in order to reduce staff contact and exposure, and provide additional training on such resources.
- Articulate employer’s commitment to employee privacy.
- Consider staggering employee shifts and breaks.

SPECIAL EMPLOYEE CONSIDERATIONS

- Provide reasonable accommodations to employees with ADA-qualifying disabilities.
- Employees with pre-existing mental conditions that have been exacerbated by COVID-19 may be entitled to reasonable accommodations; be sure to engage in an interactive process with the employee for any accommodation requests.
- Do not ask employees whether they have an underlying medical condition that makes them more vulnerable to COVID-19.
- Employees who contract COVID-19 in the workplace may file a workers’ compensation claim.
- Provide accommodations and greater flexibility for those individuals who may be at a higher risk of severe illness from COVID-19; but do not compel, such persons to stay home.
- Provide flexibility to employees with child or elder care obligations.

FOSTER A COMMUNICATIVE CULTURE

- Communicate all details, and solicit staff input, throughout each phase of the re-entry strategy.
- Engage and ensure leadership alignment with all phases of the reentry to the workplace strategy.
- Schedule virtual meetings for staff to communicate guidance, policies, and to solicit questions and feedback.
- Establish mechanisms for ongoing two-way communication with staff.
- Communicate new protocols and standards though all available channels, including signage, virtual meetings, recorded messages, and employee intranet.
- Promptly share all relevant updates from federal, state and local governments and agencies to demonstrate fluidity, and to establish employer as a trusted source of information.