As businesses begin to structure plans for recovery after the relaxing of government “Stay-at-Home” orders, it is paramount that comprehensive assessments of their operations are conducted to ensure the safest possible environment for their employees as they start to return to the workplace.

While every business should individually decide when and how this unfolds, all businesses need to evaluate, identify, and take proactive measures to mitigate their risks before their workforce returns. It is also important to remember that many unknowns remain surrounding COVID-19, and the following guidelines could change.
EVALUATING WORKPLACE RISK

Every business should analyze their workforce to identify risks associated with their employees:

**LOW RISK EXPOSURE**
Workers with jobs that have minimal occupational contact with the public or other coworkers, for example, remote employees, long-distance truck drivers, or agricultural employees.

**MEDIUM RISK EXPOSURE**
Workers with jobs that require frequent or close contact with the public and people who may be infected, but are not known to have or who are not suspected of having COVID-19. This category includes anyone who may have contact with the general public in the course of their work such as, in the retail and school sectors.

**HIGH RISK EXPOSURE**
Workers with jobs that have a high potential for exposure to known or suspected cases of COVID-19. This category includes anyone who has direct contact with known or suspected COVID-19 cases, such as healthcare workers who treat COVID-19 patients.

**VERY HIGH RISK EXPOSURE**
Any jobs with very high potential for exposure to known or expected COVID-19 cases, including direct exposure to COVID-19 or other direct contact with the bodily fluid of diagnosed COVID-19 or suspected COVID-19 cases. This category includes healthcare workers performing aerosol-generating procedures such as intubation or any invasive specimen collection, laboratory personnel collecting or handling specimens from known or suspected COVID-19 patients, and morgue workers performing autopsies on those who are known to have had or are suspected of having, COVID-19 at the time of their death.
MANAGING WORKPLACE RISK

Employers should develop and implement appropriate workplace safety policies informed by industry standards. When developing guidelines for employees and company properties, employers should follow federal, state, and local regulations and policies.

Employees should have appropriate personal protective equipment (PPE), including face masks and gloves, if indicated by local regulation.

- If there is no mandate in place, employers are not required to provide protective equipment.
- However, as of April 3rd, CDC guidelines recommend the use of a cloth face mask, as this could potentially slow the spread from asymptomatic carriers. These recommended cloth face coverings are not subject to OSHA’s respiratory protection. The CDC has advised that surgical masks or N-95 respirators should be reserved for healthcare workers.
- According to OSHA’s respiratory protection standard (CFR 1910.134), if a respirator is not necessary to protect the health of an employee during occupational exposure through chemical or hazardous substance handling and exposure, it is at the employer’s discretion if they are allowed. Employers are within the applicable OSHA standard if they deny an employee’s request to wear a surgical mask or a respirator in the workplace.

Social distancing guidelines should continue to be maintained

- The CDC’s Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19) carries updated guidelines on social distancing.

Temperature checks may be conducted on employees

- Employees must be informed if they have a temperature. Guidance on temperature taking best practices are still developing, but you should be aware of potential HIPAA privacy and discrimination issues if you implement.
- Conduct an evaluation of reasonably anticipated safety and health hazards for the individual collecting temperatures. Determine what steps can be taken to mitigate or eliminate potential hazards, including the use of PPE, such as a face shield.

Sanitation best practices

- Employers should provide soap and water for hand washing in the workplace. If soap and water cannot be made readily available for employees, alcohol-based hand sanitizers that are at least 60% alcohol should be provided. If an employee's hands are visibly dirty, soap and water should be used instead of hand sanitizer. It is the employer’s responsibility to ensure that adequate supplies are maintained.
- Hand sanitizers should be placed in multiple locations to encourage good hand hygiene.
- Employers should place posters that encourage good hygiene at the entrance of workplaces or in other high-traffic areas.
PREPARING THE WORKFORCE\textsuperscript{2}

**Communicate:** It is more important than ever to offer clear communications to employees and management about new processes and expectations for the return to work.

- Establish consistent communications that address any new policies, procedures or processes for the workforce.
- Ensure that managers are prepared to answer any questions from their direct reports about expectations or new processes.
- Address the timing of any new requirements impacting workers.
- Place signage at any points of access to the building to help remind employees of any new requirements.
- **Be Prepared:** Have communications drafted and ready to go in the event of a positive COVID-19 case within the workplace.

**Cleaning Procedures:** New cleaning protocols should, at minimum, include increasing the frequency with which workstations and common areas are cleaned. Companies should consider offering increased sanitizing stations, increasing the amount of inventory and how often restocking occurs, and review the disposal of any PPE per WHO/CDC/OSHA guidelines.

ADDITIONAL PRECAUTIONS\textsuperscript{4}

Some solutions may need to be driven by encouraging changes to how employees behave at work. **Changing these behaviors can reduce the possibility of widespread infection:**

- Ensure that sick workers are empowered to stay at home
- Reduce or replace face-to-face meetings with virtual communications whenever possible
- Consider implementing additional teleworking or remote working options for employees
- Establish schedules with alternating days or extra shifts to reduce the total number of employees in a facility at any given time
- Discontinue any nonessential travel to locations with ongoing COVID-19 outbreaks and regularly check [CDC travel warnings](https://wwwnc.cdc.gov/travel/)
- Workers who need to wear protective clothing and equipment should be trained on how to put it on, use it effectively, how to clean and care for it, and how to take it off correctly, including within the specific context of their current duties and any potential duties
  - If training materials are provided, they should be easy to understand and available in appropriate languages for all workers

For some workplaces, there may be additional ways to reduce potential exposure to the hazard of COVID-19 without relying on changing employee behavior. **For some workplaces, these may be the most cost-effective solutions to implement to minimize the risk to employees of COVID-19:**

- Install high-efficiency air filters
- Increase air ventilation rates
- Install physical barriers, such as transparent plastic sneeze guards
- Install drive-through windows for customer service
IDENTIFYING AND REPORTING COVID-19

Employers should teach employees to recognize the signs and symptoms of COVID-19 and self-monitor if they suspect they may have been exposed.

Employers should ensure that there is a clear procedure for employees to follow and report when they are exposed, diagnosed or are experiencing the symptoms of COVID-19.

If and where appropriate, employers should work with their workforce to develop procedures for immediately isolating people who have any signs or symptoms of COVID-19 and train employees to report possible infections.

IN THE EVENT OF SUSPECTED ONSITE COVID-19

If a sick worker cannot safely be sent home immediately, move them to an isolated location away from any workers, customers or other visitors. While most worksites do not have isolation rooms, a designated area with doors can serve as isolation rooms until potentially sick people can safely leave the worksite.¹

Follow the CDC’s guidelines on cleaning and disinfecting any rooms or areas that have been occupied by those with suspected or confirmed COVID-19.

The infected employee should compile a list of everyone with whom they had contact with during the time the employee had symptoms and two days before showing symptoms. Anyone who had close contact (was within six feet of the employee during this time) should be considered exposed and monitored for symptoms.

Employers should also follow the CDC’s guidelines outlined in Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19).

¹ https://www.osha.gov/SLTC/covid-19/hazardrecognition.html
³ https://www.fisherphillips.com/post-pandemic-faqs#L5
⁴ https://www.osha.gov/Publications/OSHA3990.pdf