Phased Opening Considerations Guideline

PHASE I

Developing Workplace Safety Measures

- Review property management's or owner's disinfecting, sanitation, and cleaning procedures and schedules for leased workspaces for compliance with CDC recommendations applicable to the workspace involved

    - Detail cleaning procedures to include times of day for disinfecting

    - Create best practices to lessen physical contact at building parking areas, entry points and elevators/stairways during arrival and departure for employees and visitors

    - Develop common area best practices and capacity guidelines (ex. cafeteria, breakrooms, kitchens, restrooms, hallways, elevators and stairs)

- Review and define employee health screening procedures

    - Determine whether temperature checks will be instituted

    - Recognize recordkeeping and confidentiality obligations when utilizing and recording temperature check information

    - Determine if self-attestation forms will be utilized (do not include questions specific to employee family member exposure or infection per EEOC guidance regarding GINA)

- Develop an exposure-response plan [COVID-19 Response Plan] that addresses:

    - Communication to state or local department of public health as appropriate

    - Isolation/quarantine, containment and identifying other employees in contact with affected employee

    - Exposure communications to affected staff while observing ADA requirements

    - Cleaning and disinfecting of workspace of affected employee

    - Stay-at-home requirements

    - Return to office eligibility requirements

    - Does Aerosol Transmission Disease (ATD) Standard cover operations?

    - Has industry-specific guidance been issued by OSHA, CDC?

    - Demonstrate to employees how COVID-19 spreads and methods followed to prevent exposure

- Develop process for providing and replenishing personal protective equipment (PPE) such as:

  - Masks and gloves

  - Personal hand sanitizer and hand sanitizing stations in certain common areas where handwashing is not immediately available

  - Disinfectant spray and cleaning supplies for personal workspaces and high-touch common areas (e.g., telephones, keyboards, doorknobs, workstation surfaces, copiers/printers, fax machines, water dispensers)

- Establish physical distancing measures within the workplace

  - Limit the number of employees on a floor per workday – recommended guidance of not exceeding 50% of fire capacity occupancy or eight (8) persons per 1,000 square feet (assuming compliant with state and local health department requirements).

  - Develop staggered hours/shifts and lunch/rest breaks

  - Rotate weeks or weekdays in the office and work remotely

  - Move workstations to increase separation distance

  - Implement one-way traffic patterns throughout workplace where feasible

  - Remove chairs or block seating to create safe distances for seating in conference rooms

  - Post signage on doors to limit number of persons at one time in conference spaces and common areas

  - Encourage teleconference or videoconference meetings wherever possible

  - Install protective screens or other contact-mitigation measures such as drop-off boxes for high employee/customer contact desks/areas

- Restrict business travel

  - Define essential travel

  - Encourage online training

  - Follow government and public health guidance to ease travel restrictions over time

- Define customer and/or visitor contact protocols such as:

  - Communicate and provide express visitation protocol

  - Direct customer traffic through workplace and confine customers to specific areas

  - Limit the number of customers in any area at one time

  - Offer masks to customers

- Enforce no handshake greetings, and remain at least 6 ft. apart

- Use video or telephone conferencing instead of in-person customer meetings

- Provide contactless pickup and delivery of packages

- Consider use of assumption of risk or waiver agreements (where appropriate and permitted by law)

- Develop a communications campaign to address at least:

  - Signage in hallways and other common areas (visit CDC or state/local department of public health website for examples) with reminders to observe symptoms onset, wear masks, avoid touching others, sanitize, and create physical distance

  - Signage for shared equipment (such as copiers/printers, fax machines) and dispensers (such as water coolers) to use sanitizing wipes before and after use

  - Signage in restrooms of handwashing technique reminders

- Identify Workers' Compensation Impact and Risks:

  - Identify positions, if any, with greater potential for occupational exposure to the coronavirus

  - Develop training protocols for individuals at greater risk for occupational exposure

- Review state or local law to determine additional requirements or best practices:

  - Ensure compliance with requirements to take advantage of any state or local law limiting liability for business owners (e.g. Georgia COVID-19 Pandemic Business Safety Act signage requirement)

  - Ensure compliance with any state-specific workplace safety and health standard (e.g. Virginia)

PHASE II

Planning for How and When Employees Will Return to Office

- Communicate with all employees regarding workplace safety

- Provide guidelines for development of office/division return-to-office plans by location

  - Phasing-in employees returning to office:

    - Determining employees who should begin rotating in and intervals to follow:

      - Employees in positions that are not suitable for long-term teleworking

      - Front desk staff and essential administrative staff

- Customer contact positions

- Leadership

- Plan schedule/shift changes to provide the greatest protection to employees

- Consider using compressed or alternate workweek requests to lessen on-site presence

- Identify positions that can continue to telework

- Split in-office/telework schedules (e.g. 3 days in-office/2 days telework)

- Create staggered start times based on minimizing risks for elevator/common areas of travel

- Create a plan for employees in high-risk categories[1] for infection to return to office

  - Consider allowing staff to work from home or provide available leave options for employees unable to return consistent with EEOC guidance recommended for ADA compliance

  - Determine increased measures to protect staff when working onsite, including isolated workstations, additional PPE as requested, fewer days in the office, controls on office access limited to approved essential personnel.

- Determine how to handle employees who are unable or unwilling to return to office

  - Low-risk employees who are fearful of returning to office

  - Employees who have family obligations that interfere with the ability to return to office (e.g. childcare or caring for a family member at high risk for serious complications from COVID-19)

  - Employees who remain under quarantine due to exposure to COVID-19 or caring for a family member with COVID-19 symptoms

- Creating return to office guidance for those recovered from COVID-19 or following quarantine

PHASE III

Communication Planning

- Develop enterprise-wide communication strategy

  - How staying home if sick and physical distancing policies are being used to protect employees and customers

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[1] High-risk may include persons who are at higher risk for severe illness per CDC guidelines, or who live with someone who is high-risk.

- ☐ Inform about new workplace safety and disinfection protocols that have been implemented

- ☐ Determine cadence for regular reminders

- ☐ Monitor an email inbox for questions

- ☐ Utilize intranet/SP site for repository of communications

- ☐ Create protocol for visitors re: health screening questions (i.e., no COVID-19 related symptoms, no COVID-19 positive test result within 14 days or pending test, no exposure to COVID-19 within 14 days, illness-free)

- Return to Office Training for all employees

  - ☐ Develop expectations for workplace to include:

    - Sanitation and disinfecting

    - Health Screenings or attestations (i.e., no COVID-19 related symptoms, no COVID-19 positive test result within 14 days or pending test, no exposure to COVID-19 within 14 days, illness-free)

    - Physical distancing expectations

    - What to do if you are exposed or develop COVID-19 related symptoms?

    - PPE & cleaning supplies

    - In-person meeting guidelines

- Communication of policy recommendations/interpretation for managers

  - ☐ Review and confirm applicable requirements for Families First Coronavirus Response Act leave pursuant to DOL guidance to manage leave requests (and display mandatory FFCRA poster)

  - ☐ Attendance policies broadened to encourage sick employees to stay home

  - ☐ Consider other possible leave options – traditional FMLA leave, state or local paid sick leave, unpaid ADA accommodation leave

  - ☐ Time-off request procedures clarified to indicate when time off can be required by the employer should sick employees be sent home

  - ☐ Flexible scheduling options implemented allowing for compressed workweeks and flexible start and stop times

  - ☐ Meal and rest break policies adjusted to stagger times and processes implemented to encourage physical distancing

  - ☐ Travel guidelines established - essential versus nonessential travel

Implementation and Continuous Monitoring

- Develop timeline for reentry of staff to begin

- Monitor impact on productivity and adjust as needed

- Evaluate level of PPE usage in accordance with federal, state and/or local public health recommendations

- Assess regularly and issue periodic reminders of best practices

- Monitor in-office employees who present symptoms

  - Activate exposure/infection response plan (see Phase I) to immediately inform and/or quarantine affected staff

  - Conduct analysis to determine if other measures would have helped, and adopt improvements where needed

- Record actions taken by date and category for phased reopening purposes