

Key Questions and Resource References for Maintaining Workplace Safety



"Opening offices will be our decision, when and if our employees come back, will be theirs."

JENNIFER CHRISTIE CHIEF HR OFFICER, TWITTER





This report contains questions, insights, recommendations and resources for consideration in the development of programs to help ensure workplace safety in the reopening of facilities during the COVID-19 crisis. The ideas in this report are neither exhaustive or comprehensive and do not represent a substitute for legal advice. We recommend that all programs and policies developed for reopening facilities be reviewed by a legal professional prior to implementation.

Ensuring workplace safety will require cross-functional leadership and decentralized decision-making

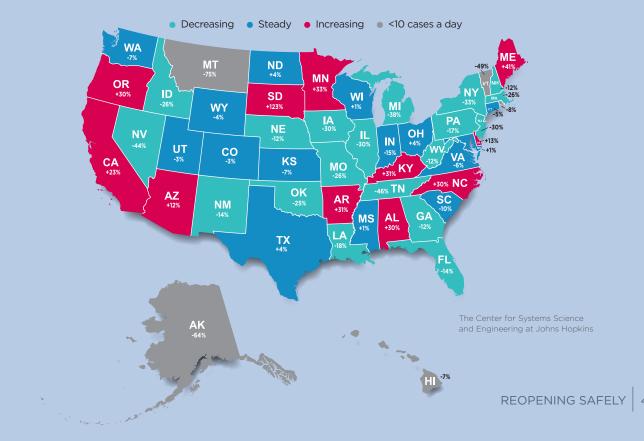
As companies across the U.S. begin to reopen, business leaders face unprecedented challenges in developing strategies for safely reopening workplaces. Safety guidelines differ from state to state, and a lack of federal rules for keeping employees safe places the onus on companies to determine what is best for their employees.

Amidst evolving trends in hospitalization rates for coronavirus disease 2019 (COVID-19), which widely vary. The map below provides a snapshot of the trends over a one-week period from May 7 to May 14, showing which states have increasing, decreasing and steady hospitalization rates. So far, what impact the reopening of businesses will have on infection rates is unclear. Whereas high-risk states are seeing fewer new COVID-19 cases, hospitalization rates are still increasing in others. The first stages of reopening have not produced a surge in most states, but it is still early and a second wave of infections is possible.

Since the onset of the COVID-19 crisis, countless articles have shown that no playbook exists for business leaders in dealing with this crisis. However, one fact remains certain: despite the lack of clear rules, every business needs to develop its own playbook to ensure the protection of employees and the public and to demonstrate that preemptive steps have been taken to reduce risks. Legal experts predict an onslaught of claims related to COVID-19. To ensure workplace safety, businesses need to develop corporate policies via cross-functional leadership teams. These policies must then be monitored and managed through decentralized decision-making at the facility level.

This report presents the questions that business leaders are contemplating when developing plans for reopening along with expert insights, links to resources and a list of "reopening playbooks" to use in building your organization's program for safely reopening.

Changes in new COVID-19 cases: May 7-14, 2020





Does wearing face masks reduce the need for social distancing at work?



The Center for Disease Control (CDC) recommends that individuals wear face coverings or non-surgical face masks in community settings. After the CDC's recommendations went into effect, some states and municipalities began imposing obligations on businesses and individuals with respect to face mask use.

Medical experts caution that wearing a face mask is not an excuse to relax or forego social distancing in the workplace. Peter Gulick, an infectious disease specialist and professor of medicine at Michigan State University, says, "Face masks do not replace social distancing. They are not to be used so that you can get closer to other people."

Employers should consider the state and local requirements regarding face masks and provide employees with instructions or training on how to wear, maintain and clean their face masks.

RESOURCE LINKS:

- Recommendation Regarding the Use of Cloth Face Coverings, CDC,
- Personal Protective Equipment, OSHA





Should we monitor employees' temperatures before allowing access?

On March 18, 2020, the Equal Employment
Opportunity Commission (EEOC) issued guidance
allowing employers to take employees' temperatures
to ward off the spread of COVID-19. The CDC indicated
that "employers may measure employees' body
temperatures. However, employers should be aware
that some people with COVID-19 do not have a fever."

- Legal, medical and HR experts offer the following advice for companies that take employees' temperatures:
- Train individuals administering temperature checks on the procedure.
- Review pay practices for employees who are sent home for having high temperatures to limit any legal risk.

- Keep employee temperature readings confidential.
- Stagger shift start- and end-times to reduce over-crowding at entrances and exits.
- Create corridors where employees can enter the facility through a temperature-checking line.

- EEOC: Employers Can Screen for COVID-19, SHRM, April 23, 2020
- Can Employers Test Workers' Temperatures?, EHS Today, April 3, 2020

Can we require employees to observe infection control practices?



Requiring strict adherence to infection control practices among all employees is a critical component in your strategy for safely reopening. This should include social distancing, wearing face masks, regular hand washing, following proper coughing and sneezing etiquette and prohibiting the use of another worker's phone, computer or equipment. Consider increasing the number of hand washing stations, provide tissues and hand sanitizing gel throughout occupied work areas and provide covered receptacles for discarded tissues.

Communications will play a vital role in helping to ensure compliance with infection control practices. Be certain that communications of detailed plans are posted on your employee intranet, facility bulletin boards and facility signage and are included in employee communications venues such as newsletters, blogs and email updates.

RESOURCE LINKS:

• Question & Answer Employer Guide: Return to Work in the Time of COVID-19. The National Law Review, April 22, 2020





Should we consider contact tracing as part of our reopening plan?

Contact tracing is considered by most experts to be an essential step in controlling the spread of COVID-19. However, companies that are considering contact tracing as part of their reopening strategy must address the concerns about privacy and the potential for discrimination.

Apple and Google have released initial versions of new virus proximity tracking tools with rollouts planned for some time in May. Digital contact tracing, in which tracers try to identify potentially infected individuals via phone calls, in-person screenings and voluntary disclosures, would supplement manual tracing efforts. Some companies, such as PwC and Ford Motor Co., are developing their own tracking devices as they prepare to reopen offices and factories.

A survey of CFOs by PwC in April revealed that 22 percent of companies planned to incorporate contact tracing into their reopening plans. Experts believe that these tools will be less than effective unless the employers who use them require mandatory compliance.

- An Update on Coronavirus Contact Tracing: Status, Benefits, and Key Considerations, The National Law Review, April 30, 2020
- Contact-Tracing Apps Can Keep Tabs on Coronavirus, SHRM, May 12, 2020





Reducing the risk of exposure to COVID-19 by cleaning and disinfection is an essential part of your reopening strategy. The procedure will, however, significantly differ based on the nature of each workplace and environment. All employers should frequently clean and disinfect used spaces such as bathrooms, breakrooms, common areas and shared electronic equipment. The CDC advises the following cleaning procedures:

- Clean surfaces with soap and water before disinfecting.
- Disinfect surfaces using products that meet the EPA's criteria for COVID-19.
- Cleaning staff should be equipped with and use disposable gloves and gowns.

- Due to the risks and hazards associated with many cleaning products, additional PPE may be necessary to protect the employees engaging in cleaning activities.
- Employers should also develop procedures for properly disposing of used cleaning products and PPE worn by the individuals who are cleaning.

RESOURCE LINKS:

- CDC, Cleaning and Disinfecting Your Facility
- COVID-19: General Guidance for Cleaning and Disinfecting for Non-Health Care Settings, NYC Health Department
- Disinfectants for Use Against SARS-CoV-2





What physical changes should we make in our workplaces?

The modern workplace will never be the same as a result of COVID-19. Some of the changes related to workstations, partitions, traffic flow and monitoring are still on the drawing board. However, employers can now take many steps for reconfiguring workplaces to reduce the risk of COVID-19, including the following:

Create Barriers: Install plexiglass or other solid screens where employees sit in close proximity.

Reconfigure Space: Move desks and workstations to create more distance between workers.

Limit Equipment Use: Prohibit the sharing of equipment and devices as much as possible.

Redesign Traffic Flows: Limit hallways, where feasible, to one-way traffic.

Enhance Indoor Air Quality: Engage HVAC contractors to increase the level of air changes and ventilation in the workplace.

- Rethinking Workplace Design In The Wake Of COVID-19, Work Design Magazine
- Our offices will never be the same after COVID-19. Here's what they could look like., Fast Company, April 13, 2020
- Designing a safe work space for the postpandemic era, Fortune, May 5, 2020
- After coronavirus: The office of the future is the office of the past, CNBC, April 27, 2020





Filtration in building heating, ventilation and air conditioning systems can be a part of an overall risk mitigation approach but should not be regarded as a solution by itself. There is no direct scientific evidence of benefit, but some reduced exposure can reasonably be inferred based on the ability of some filters to remove particles containing the COVID-19 virus.

In order for filters to have any impact on infectious disease transmission, they have to properly treat recirculated air and be appropriately designed for the building in which they are used.

More importantly, in most buildings and in most situations, filters may be considerably less effective than other infection control measures, including social distancing, isolation of known cases and handwashing.

RESOURCE LINKS:

- Guidance on Preparing Workplaces for COVID-19, OSHA
- National Air Filtration Association, COVID-19 Air Filtration FAQs
- ASHRAE COVID-19 Preparedness Resources



What common areas of the workplace should be controlled?



CONFERENCE ROOM CLOSED

In creating your organization's reopening plans, any areas where employees gather in groups must be subject to new guidelines for controlling access.

When employees are allowed to return to Salesforce San Francisco offices, they will encounter a very different environment. Elizabeth Pinkham, Salesforce's executive vice president of global real estate, says, "We're taking a very careful, phased approach. It's going to be more controlled." Conference rooms may operate at less than half the normal capacity, elevators will be limited to a few people at a time, and the company is considering the use of copper and brass surfaces that kill many microbes.

Consider the following measures for increasing control over common areas to improve workplace safety:

- Reconfigure office hangout spots and gathering areas to minimize socialization.
- Adjust breakroom rules and spaces. While employees may be legally entitled to breaks, companies need to ensure that designated breakroom areas allow social distancing and that enough space is available to accommodate staff.
- Limit room capacities. Post the number of people each room can accommodate, and update room reservation software accordingly.

What access controls should we consider?



Digital solutions have created a variety of convenient efficiencies in the modern workplace. However, many of these rely on touch for navigation, which is no longer viable in the post-COVID-19 work environment. Fortunately, solutions already exist for replacing the touch-based systems currently used for opening doors, reserving conference rooms and wayfinding, as well as those used in food and beverage kiosks.

Consider the following options in planning for your post-COVID-19 environment:

Control via Mobile Devices: For years, companies have been migrating employee experiences to smartphones. Mobile apps and Bluetooth

technology represent convenient tools for empowering employees to navigate workplace environments in a touchless manner.

Gesture-based Controls: Already widely used in company restrooms, gesture controls can be used for non-secure access control or situations in which using a personal device to interact would be cumbersome or disruptive.

Voice Control: Made popular by Siri, Google and Alexa, voice-based controls have been a proven means of secure access and authentication in banking for more than a decade.





How can we encourage and enforce social distancing?

Centers for Disease Control and Prevention (CDC) has issued guidance regarding policies to facilitate social distancing within the workplace, such as using videoconferencing or teleconferencing when possible for work-related meetings and gatherings, even if employees are in the same building.

In reopening offices, companies must compel employees to comply with social distancing rules in the workplace. These rules should be communicated electronically and/or in hardcopy at workstations and common areas. Materials should be easy to understand and available in the appropriate language and literacy level for all workers.

Workplace signage, floor decals and banners are also very effective for reinforcing social distancing policies. Consider providing video training to returning employees to introduce them to new workplace rules. Employees should acknowledge receipt of the rules and training. HR professionals should train supervisors on how best to enforce social distancing rules.

- 4 Ways to Ensure Social Distancing, Smarter with Gartner, April 14, 2020
- Video: Social Distancing at Work, Baylor College of Medicine





More flexible hours and shifts may be required to ensure that employees are sufficiently distant and to minimize the number of individuals congregating in common entry or exit spaces. Similarly, alternating days of work for different groups or teams of employees may assist with social distancing requirements.

Now, like many other changes ushered in by necessity during the COVID-19 crisis, flexible work arrangements are likely to become a permanent fixture in the workplace, even after current restrictions are either relaxed or removed.

Flexible work arrangements have been growing in popularity for years as strategic initiatives to improve recruitment, retention and productivity. Advocates say flexible work arrangements encourage worklife balance and can result in increased employee satisfaction, loyalty and engagement. They can also help retain working parents, caregivers or workers with health conditions who have to balance doctors' appointments and work hours.

RESOURCE LINKS:

Managing Flexible Work Arrangements, SHRM Toolkits





Your reopening plan should include a comprehensive review and revision of existing policies to ensure a safe workplace environment and compliance with all newly-enacted laws. If you have yet to begin this process, please pay special attention to the following:

Paid Sick Leave: Many state and local paid sick leave laws have been modified based on COVID-19-related absences, and the Families First Coronavirus Relief Act (effective April 1, 2020) applies to most employers of fewer than 500 employees.

Remote and Telework Policies: Consider an interim addendum to employee handbooks and manuals to address these rapidly changing provisions.

COVID-19 Exposure: Develop detailed policies for when employees become symptomatic, test positive or are potentially exposed to COVID-19.

- What Employers Need to Do to Re-Open Post-COVID-19, EHS Today, May 4, 2020
- COVID-19 Back-to-Work Checklist, SHRM, April 23, 2020

What supplies do we need to stock?



Preorder supplies that will be needed to facilitate a smooth return to work, keeping in mind CDC guidelines and applicable state and local return-towork orders

Your company should stock hand sanitizers, tissues, paper goods, sanitizing wipes, bottled water, face masks and gloves. Special cleaners may need to be ordered, and personal protective equipment (PPE), such as gowns, gloves and masks may be needed for any individuals who clean or remove trash. In some instances, face shields may also be required.

Depending on state and local government requirements, preparations for medical testing, such as electronic or sanitary thermometers, should be considered

Many states have created PPE markets to help businesses acquire the supplies they need to reopen safely.

RESOURCE LINKS:

• US state and local health departments, Live Science, April 12, 2020





Should returning workers undergo safety training?

Dr. Tista Ghosh, an epidemiologist at healthcare company Grand Rounds, recommends that, "Training should be made available for all employees on basic infection control practice. This includes how to properly wear a face covering, wash hands, gauge six feet of distance and more."

Many employees will have anxieties about the health risk in returning to work. Workplace policies and protocols should address employee concerns and clearly communicate the plans and processes that will govern employees' return to work. At a minimum, employees should be given information regarding social distancing measures, wearing masks, frequent handwashing, cleaning all surfaces and the prescreening protocols your company will be utilizing.

In addition to educating or training employees on new policies for workplace safety, employers should not assume that returning employees are knowledgeable about best practices for protecting their safety at home and away from work. Informing employees what they can expect and keeping an open line of communication will help reduce employees' fears and streamline the adoption and implementation of the new practices and processes.

RESOURCE LINKS:

 Return to Work: A Template for Safety Practices and Protocols, EHS Today





Few considerations matter more or are more sensitive than how your company will respond if an employee tests positive for COVID-19. Protocols must be in place for communicating with employees, including the steps that need to be taken to minimize the risk of the disease spreading, identifying the coworkers who have been in close contact with the employee, connecting with these coworkers and communicating with and protecting the privacy of all involved parties.

If your company does not yet have a plan in place based on advice from your legal counsel or HR partner, please consult the following resources for guidance:

RESOURCE LINKS:

- CDC: Suspected or Confirmed Cases in the Workplace
- Your Employee Tested Positive for Covid-19.
 What Do You Do?, Harvard Business Review, March 30, 2020
- CBIA: How to Respond If an Employee Tests Positive for COVID-19





How should we manage workplace communications after reopening?

Your strategy for communicating with employees after reopening should be flexible, multi-level and two-way in order to maintain trust with returning workers while maximizing safety and productivity.

As federal, state and local guidelines change in response to new data and as new information becomes available through your industry and professional associations, your communications team needs to respond by keeping all levels of the organization informed to facilitate more effective decision making. Relying on one-to-many communications is not enough. Managers need to sense and respond to employee concerns and incidents as they occur. Make sure all employees are

comfortable and aware of what you are doing to ensure safety. Employees should understand that reopening policies will be a part of an evolving process. In addition to contributing to formal communications, senior managers should model and reinforce the behaviors needed to maintain a safe workplace.

- How to Create a Communications Plan for Reopening, PR News, Maty 8, 2020
- How to Effectively Communicate Your Reopening Plans to Customers, US Chamber of Commerce

Where can we find best practice references to use in creating our own "returning to work" playbook?



Ford: Return to Work Manufacturing Playbook



Tesla Return to Work Playbook



Lear: Safe Work Playbook 2nd Edition



USDA COVID-19 PLAYBOOK Version 2.0

Looking for ideas and best practices to use in building your company's return to work playbook? The staff at Trendicators and Engage2Excel would like to express our appreciation to Ford, Tesla, Lear and USDA for making their playbooks publicly available online.

While countries have locked down their borders to curtail the coronavirus spread, we are witnessing an unprecedented new era of global collaboration. Leading scientists, researchers, NGOs, businesses and news organizations from across the US and around the world are sharing information freely in near real-time with the understanding that it is only through cooperation that we will ultimately defeat this deadly pandemic disease.

The Engage2Excel group of companies creates engaging career and consumer experiences. Its Career Experience Suite (CXS) provides recruitment, onboarding, employee recognition, manager development and employee survey solutions tailored to each organization and designed to help clients find and keep their talent. With over 3,000 client partners, Engage2Excel has a proud heritage of developing innovative solutions that improve competitive advantage and boost bottom-line results.

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