



COVID-19 is a fluid and dynamic situation. While no guidance document can account for the myriad of ways that a business may be impacted by a global pandemic, this document is designed to guide you through some of the more common and pressing questions that must be answered as we return to work and plan to continue working in a post-COVID-19 world.

ASSESS YOUR NEEDS AND CURRENT SITUATION

- o How has the pandemic changed your workplace?
- o How has the pandemic changed the market?
- o At what level will you be operating when you reopen?
- o How will you prioritize which divisions or functions return first?
- o Assess which positions should be on-site and which can work remotely.
- o Are there alternate ways in which you can deliver your services?
- o Are there alternate ways in which your employees can perform their jobs?
- o Can you cross-train employees across different jobs?
- o How will employees interact with customers?
- o What changes will need to be made to the workplace to make it safe?
- o Do you have needed supplies?
 - Soap
 - Towels
 - Tissues
 - Hand sanitizer
 - Facemasks
 - Face coverings
 - Thermometers
 - No-touch, lidded trash receptacles
 - Gloves
 - Disinfectant
- o How many days will your supplies last?
 - Aim for a 30-day supply of most items.
 - Aim for 1 thermometer per 100 employees.
- o Are there any changes that are necessary due to finances?

PREPARING A HEALTHY WORKPLACE

- o Examine the facility's ventilation system.
 - Can it be improved?
 - Are the filters changed regularly?
 - Can the ventilation rates be increased?
 - Can a greater percentage of outside air be circulated?
- o Provide tissues regularly throughout facility with nearby trash receptacles.
 - Consider utilizing no-touch, lidded trash receptacles.
 - Consider placing placards near the supplies to indicate to whom requests for replacement should be addressed.
- o Provide soap and water.
 - Consider limiting the number of individuals at hand-washing stations.
 - Place signage regarding any limitations.
- o Provide hand sanitizer with at least 60% alcohol.
 - Consider placing placards near the supplies to indicate to whom requests for replacement should be addressed.
 - Consider placing sanitizing wipes near the dispenser.
 - Consider utilizing no-touch, lidded trash receptacles.
- o Place posters that encourage proper hygiene and other safe practices at the entrance to your workplace and other locations where they will be seen by employees.
 - Consider laminating the posters so they can be disinfected.
 - Routinely verify the posters contain the most up-to-date information.
- o Clean and disinfect the entire workplace paying particular attention to all frequently touched areas and items. These include, but are not limited to: keyboards, telephones, copy machines, coffee machines, refrigerators, door knobs, handrails.
- o Consider providing sanitizing wipes near shared office equipment or tools to facilitate after-use wipe downs.
 - Consider placing placards near the supplies to indicate to whom requests for replacement should be addressed.
 - Consider utilizing no-touch, lidded trash receptacles.

MAINTAINING A HEALTHY WORKPLACE

- o Create a system for routine cleaning of frequently touched items.
 - Who will clean?
 - How often will items be cleaned?

- What products will be used to clean?
- How will you ensure quality control?
- Document cleaning.
- Create a chart listing all areas to be cleaned, the method of cleaning, and the frequency of cleaning.
- o If required or suggested, provide face coverings and masks.
- o Ensure soap, sanitizer, cleaning products, and tissues are replaced as needed.
 - Who will be responsible for ordering?
 - Who will be responsible for replacing?
 - Where will items be stored?
- o Ensure employees and visitors know how to get replacement items if needed.
 - Consider placing placards near the items indicating who to contact if replacements are needed.
- o Implement a more frequent emptying of trash receptacles.
 - Look at trash receptacle options.
 - Can you provide no-touch, lidded receptacles?
- o Prohibit employees from using the office equipment or tools of another employee, including, but not limited to: phones, keyboards, desks, work tools.
- o Consider setting aside one day with no entry to the facility for weekly deep cleaning.
- o Temperature checks and health screenings.
 - Will the Company use health screenings?
 - Will employees check their own temperatures?
 - Will the Company check temperatures?
 - Will records of temperatures and other health screenings be kept? If so, where?
 - Can you ensure privacy of health information?

ESTABLISH POLICIES FOR SOCIAL DISTANCING – BE PREPARED TO EXPLAIN WHAT YOU’VE DONE AND WHY IT WAS APPROPRIATE.

- o Reimagine and repurpose rooms to maximize physical distance.
- o Implement flexible work arrangements.
- o Implement flexible work hours.
- o Permit telework.
- o Transition to mobile timeclocks.
- o Stagger meal and breaktimes.
- o Reassign lockers to permit distancing.
- o Prohibit large gatherings.
- o Remove tables from office areas or install screens at tables.

- o Install screens at workstations or on manufacturing lines where distance can't be maintained.
- o Establish maximum capacity for restrooms, lockers, breakrooms.
- o Close every other urinal or stall.
- o Install screens at handwashing stations.
- o Spread out workstations.
- o Install cubicles in open concept areas.
- o Install tape on floors at elevator bays to designate where to wait.
- o Install tape in places where lines commonly form (cafeterias, time clocks, etc.).
- o Remove chairs from common areas.
- o Encourage remote meetings.
- o Install six-foot lines for customers and vendors at front desks and other access points.
- o Install plexiglass screens atop short partitions.
- o Implement touchless delivery practices.
- o Consider implementing one-way walkways.
- o Considering designating entrance and exit points.
- o Will communal use of refrigerators be permitted?
- o Can additional refrigeration be obtained to limit contamination?

FACEMASKS AND FACE COVERINGS

- o A facemask is typically defined as either: (i) a filtering respirator such as an N95 or K95 or (ii) a specialized medical grade or surgical mask.
- o A face covering is a cloth, bandana, or other type of material that covers an employee's mouth and nose. The CDC lists five criteria for "cloth face coverings:"
 - fits snugly but comfortably against the side of the face
 - be secured with ties or ear loops
 - includes multiple layers of fabric
 - allows for breathing without restriction
 - able to be laundered and machine-dried without damage or change to shape.
- o Are face masks required in your jurisdiction?
- o Will you require employees and other to wear facemasks or face covering where social distancing can't be maintained?
- o Will you provide the facemasks or face coverings?
- o Who will clean the facemasks or face coverings?
- o Will you have policies regarding what images can be on homemade facemasks and face coverings?

- o What training will you offer employees on the proper use of facemasks and face coverings?
- o How will you accommodate employees who cannot wear facemasks or face coverings?

TESTING

- o Will you test employees for COVID? Will the testing be voluntary or mandatory?
- o Who will pay for the testing?
- o Will you permit employees to use non-FDA approved tests/labs?
- o Have you verified the accuracy and reliability of any tests?
- o Will an employee be required to release testing results of any employer-provided test?
- o Will you utilize a consent and authorization form?
- o Will all forms be kept as confidential medical records?
- o Have you evaluated how to effectively deal with false-positives and false-negatives?

POLICIES TO CREATE OR REVISIT

- o FFCRA (if applicable).
 - Ensure FFCRA policies are up to date and compliant.
 - Ensure FFCRA posters are displayed.
- o Cleaning Requirements.
 - Communicate the steps taken by the Company to maintain a healthy workplace.
 - Communicate any cleaning requirements for employees.
- o Physical Distancing.
 - Communicate steps taken by the Company to maintain a healthy workplace.
 - Communicate any physical distancing requirements.
- o COVID-19 Symptoms and Exposure Protocols
 - What will the Company require of employees if the employees are exposed or diagnosed with COVID-19?
 - What will the Company require if an employee has secondary exposure to COVID-19?
 - How will the Company communicate with employees about exposures or possible exposures?
- o Travel.
 - Review CDC travel notices for current information

- Advise employees to check themselves for COVID-19 symptoms before, during, and after travel and report to management if any symptoms appear.
- If employees are overseas when they become ill, they should report to their supervisor and consider calling a U.S. consular office for assistance in finding medical care.
- Is domestic travel permitted?
- Is personal travel permitted?
- Any require quarantine after travel?
- o Attendance.
 - Ensure sick leave and attendance policies are flexible.
 - Consider revising all attendance/absence related policies to ensure consistency across all policies and to ensure employees are not encouraged to come to work with COVID-19 symptoms.
 - Ensure employees are aware of the policies and any changes to them.
 - Evaluate policies to address childcare needs by employees.
- o Return to Work.
 - Set parameters for returning to work after quarantine or isolation.
 - Evaluate whether a healthcare provider's note will be required to return to work after a positive COVID-19 test.
 - Evaluate whether a healthcare provider's note will be required to substantiate the need for other leave.
- o Food and Package Delivery.
 - Can employees have packages and food delivered?
 - How will the delivery be handled?
- o Visitors in the Workplace.
 - Are visitors allowed?
 - What protocols will be in place to protect employees from visitors?
 - Will visitors have a health screening? Have their temperature taken?
 - Will visitors only be permitted in certain areas of the facility?
- o Temperature Checks and Health Screenings.
 - Will employees be required to check temperatures and answer health screening questions?
 - Who will verify?
 - Will the information be stored? Where?
 - Who will have access to the information?
- o Bereavement.
 - Provide flexibility to account for delays in burial/funerals caused by COVID-19.
- o Cyber Security.
 - Ensure policies are adapted to increased remote work.

- Train on additional safety precautions to be taken while working remotely.
- o Solicitation.
 - Will the Company permit fundraising for individuals impacted by COVID-19?
 - Are there any parameters on the asks?
- o Benefits.
 - Ensure employees are aware of benefit options.
 - Ensure employees are aware of any employee assistance programs that are available.
- o Reasonable Accommodations.
 - Consider how you can protect employees that may be at a higher risk for serious illness (e.g., older adults and those with chronic medical conditions).
 - Minimizing face-to-face contact.
 - Maximizing social distancing (including telework).
 - Employees who are at a higher risk for serious illness from COVID-19 may require a reasonable accommodation under the ADA.
 - Advise employees to report to HR if they may need a reasonable accommodation for these reasons.
 - Engage in the interactive process.
 - Document the interactive process.

DEVELOP COVID-19 RESPONSE PROCEDURES

- o What kind of wellness checks will you implement?
 - On-site screening?
 - At home screening?
- o What do you do if an employee exhibits symptoms at home?
- o What do you do if an employee exhibits symptoms at work?
 - Isolate.
 - Notify supervisor.
 - Gather information from the employees about contacts the employee has had and areas visited by the employee.
 - Send employee home.
 - Disinfect area.
 - Notify impacted employees.
 - Protect the employee's privacy.
- o What do you do if an employee is exposed to someone who may have COVID-19?
 - Gather information from the employees about contacts the employee has had and areas visited by the employee.

- Possibly send employee home.
- Disinfect area.
- Possibly notify impacted employees.
- Protect the employee's privacy.
- o What to do if an employee tests positive for COVID-19
 - Notify HR.
 - Follow self-quarantining and return to work guidance.
 - Anonymous notification to other employees who may have had contact.
 - Employees who had sustained close contact (less than 6 feet for longer than 5 minutes) should self-quarantine.
- o What requirements will you put in place for employees to return to work after COVID-19?
- o How will you support employees who need to care for someone with COVID-19 or care for children without daycare/school?
- o How will you respond to an employee's generalized fear of returning to work?
- o Follow CDC cleaning and disinfection recommendations.

IDENTIFY WHERE AND HOW EMPLOYEES MAY BE EXPOSED TO COVID-19 WHILE AT WORK.

- o Separate sick employees.
- o Create an isolation area or room.
- o Develop a system to inform employees of potential exposure.
- o Educate employees about COVID-19 and how to stop its spread.
 - Wash hands often with soap and water.
 - Use hand sanitizer with at least 60% alcohol if soap is not available.
 - Avoid touching ones' ears, nose, and mouth with unwashed hands.
 - Cover mouth and nose when coughing or sneezing with a tissue and dispose of the tissue. Wash your hands immediately.
- o Clean and disinfect frequently touched objects and surfaces.
- o Avoid using other employees' office equipment and work tools.
- o Practice social distancing.
- o Avoid large gatherings.

RETURNING EMPLOYEES TO WORK

- o Develop a plan to bring employees back.
 - Consider timing.
 - Set objective criteria – be wary of disparate impact claims.

- Evaluate decisions to determine any indication of bias.
- o Consider whether essential job functions have changed.
 - Should job descriptions change?
 - Will changes to job duties necessitate any new or changed accommodations?
 - Communicate any changes in job duties proactively to employees.
- o Determine which functions can work remotely.
 - Fine tune your remote work policy.
 - Communicate all expectations.
 - Consider flexible telework arrangements.
- o Do you have a union with whom you must bargain?
 - Review your collective bargaining agreement.
 - Work proactively with your union regarding changes to terms and conditions of employment.
- o Do you need to hire?
 - Have a rapid, on-boarding process in place.
 - Reimagine your on-boarding process to limit physical interaction.
 - Work with staffing companies regarding supply of workers and any COVID-19 related requirements (temperature screening, etc.).
 - Utilize the new I-9 form.
- o Train Employees on any new policies and procedures before they return to work.
- o Have staggered first-day training to reinforce messaging and procedures.
- o Train supervisors on procedures and identifying COVID-19 symptoms and how to handle a positive diagnosis.
- o Regularly communicate any updates with employees.

CREATE A COVID-19 RESPONSE TEAM

- o Who is on the Team?
 - HR.
 - Safety.
 - Management.
 - Union?
- o Team responsibilities?
 - Maintaining up-to-date policies .
 - Messaging to employees.
 - Training employees.
 - Remaining current on COVID-19.
 - Example best practices.

POSSIBLE SIGNAGE TO CREATE AND POST

- o This Bathroom is Regularly Disinfected
- o This Common Area is Regularly Disinfected
- o Temperature Check Station
- o Quarantine Area
- o Visitors Temporarily Not Allowed
- o Personal Hygiene Tips
- o Practice Social Distancing
- o Social Distancing Tips
- o Hand Washing Instructions
- o Direction of Travel Instructions

DOCUMENTATION

- o Cleaning.
- o Supply restock.
- o Health and wellness checks.
- o When policies are enacted.
- o Training employees/managers on policies.
- o When employees are sent home.
- o Employee notification of exposure.
- o Package and part arrival.

SUPPORT GOOD RESPIRATORY PRACTICES

- o Provide tissues and no-touch, lidded receptacles.
- o Provide soap and water.
- o Provide hand sanitizer with at least 60% alcohol in multiple locations.
- o Discourage hand shaking.
- o Discourage unnecessary touching.

REDUCE TRANSMISSION AMONG EMPLOYEES

- o Actively encouraging employees who are ill to stay home.
- o Providing clear guidelines on when employees may return to work.
- o Require employees to report COVID symptoms.

INBOUND MATERIALS AND PACKAGES

- o If you receive an expedited package from an area where COVID-19 is present:
 - Wash your hands frequently with soap and water.
 - Use hand sanitizer when soap and water are not available.
 - Avoid touching your face, eyes, nose or mouth.
- o If packaged materials have been in transit and/or storage for more than 48 hours from last human contact, no further action need to be taken.
- o Implement protocols for transportation and drivers.
 - Health screenings?
 - Contactless delivery?
 - Set up disinfection protocols for transportation areas.

PLAN FOR THE FUTURE

- o Additional surges?
- o Changing laws?
- o Absenteeism?
- o Ongoing remote work?
- o Resumption of business travel.
- o Sourcing supplies, masks, thermometers.
- o Increased litigation.

OTHER ITEMS TO CONSIDER

- o Continue to monitor OSHA, EEOC, DOL and other federal, state, and local restrictions and guidance.
- o Monitor compliance with PPP and EDIL loan requirements.
- o Stay abreast of changing requirements for unemployment compensation and workers' compensation.

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