A Guide on Developing a Return to the Workplace Plan: COVID-19

POMS

The following is a guide which organizations may use as a tool to develop their own **"Return to the Workplace During COVID-19 Plan."** The guide includes areas that employers may need to consider when returning to work and should not be considered an all-inclusive template. *Poms makes no declarations that the guide maintains compliance with any regulatory requirements.*

Purpose (A leadership statement that summarizes the state of coming back to work, the importance of the employees, and the willingness to implement a program with the interests of employees in mind and the flexibility to seamlessly adjust and adapt to the rapidly changing environment)

1. **Responsibility**
   a. Include a summary message emphasizing the importance of, and encouraging the responsibility of, all employees and management playing a positive role in the process of maintaining a safe and healthy workplace.
   b. Identify the key parties involved in the development, maintenance, and communication components of the program.
      i. Executive Leadership, HR, Legal, Risk Management, Finance, IT, and/or others as necessary
      ii. Appoint a Workplace Coordinator (and at least 1 alternate) or committee who will be responsible for COVID-19 issues and their impact in the workplace.
   c. Provide flexible timelines for reviewing and revising the program given the best practices, jurisdictional guidance/orders, and information as it evolves; communicate regularly and consistently with all employees.
   d. Conduct a hazard assessment specific to COVID-19 and utilize mitigation techniques based on the Risk Management Process and hierarchy of controls.

2. **Identify Affected Groups**
   a. Office employees
   b. Field employees
   c. Receptionist/Greet staff
   d. Other employees (specify)
   e. Customers/Clients
   f. Vendors who may visit premises (couriers, deliveries, food service, janitorial services, etc.)
   g. General public
   h. Others

3. **Logistical Considerations**
   a. Parking
   b. Building/Property Management

i. HVAC

ii. Utilities

iii. Special protocols

c. Elevators

d. Lobby

e. Restrooms

f. Office layout (repeat for Warehouse or other operations)

    i. Configuration

    ii. Changes in configuration

    iii. Engineering controls

    iv. Administrative controls

    v. PPE

g. Break rooms/Lunchrooms

    i. Vending machines

    ii. Refrigerators

    iii. Microwaves

h. Copy/Supply rooms

i. Conference/Meeting rooms

j. Storage closets

k. Other

4. **Timeframes** (maintain flexibility)

a. Office opening

    i. Phased in?

    ii. Office essential personnel?

    iii. Staggered work shifts?

    iv. Work from home (WFH) options

    v. "Opt-in" voluntary RTW, or WFH?

    vi. Maximum occupancy to maintain physical distancing

    vii. Establish policy for visitors which should be communicated to both internal employees and visitors and/or their employers

b. Field employees

    i. Establish protocols for field employees

    ii. Establish policy for mutual acceptance of field visit parameters between employer and other parties (clients, prospects, etc.)

    iii. Frequency of client visits (per day/week)

    iv. Prioritizing of client visits

c. Opening to visitors

    i. Appointment only

    ii. Vendors

5. **Procedures**
   a. Medical screening (See HR)
      i. Temperature checks
         1. At home
         2. At office
         3. Other
      ii. Questionnaires
      iii. Daily supervisor communication

6. **Communication** (be consistent)
   a. Identify Information Officer to employees
   b. Developments/Changes
   c. Training on best practices, PPE, etc.
      i. When?
      ii. Who? (target groups or all employees)
      iii. How? (Webinars, Online, etc.)

7. **Cleaning**
   a. Off-hour service(s)
      i. Communicate frequency and ongoing communication with vendor(s)
      ii. Provide general summary of methods
   b. In-house
      i. Self-cleaning opportunities by all for personal hygiene
         1. Types of products available and locations
            a. Wipes
            b. Sanitizers
            c. Handwashing stations
            d. Hand drying
            e. Other
         2. Training
         3. Cleaning owned vehicles

8. **Education & PPE**
   a. Masks
      i. Required?
      ii. Optional?
      iii. Type(s)
      iv. Training
      v. Cleaning/Disposal
      vi. Storage

  b. Gloves

    i. Required?

    ii. Optional?

    iii. Type(s)

    iv. Training

    v. Disposal

    vi. Storage

  c. Employer-Provided Education

    i. Best Practices

    ii. Employer Safety Programs

    iii. Timelines

    iv. Recordkeeping

  d. Other

9. Human Resources

  a. Health & Wellness

    i. Personal hygiene

    ii. Handling symptomatic employees

      1. Define symptoms and establish baselines

      2. What if an employee has a "regular" cold or allergies?

  b. Screening employees

    i. Questionnaires

    ii. Temperature checks (medical exams)

    iii. Screening or isolation rooms

    iv. Frequency

    v. Privacy

    vi. If/When to require doctor's notes

  c. Handling complaints

  d. Dealing with anxiety in the workplace

  e. Vulnerable employees

  f. Privacy concerns

  g. Leave policies

  h. Records retention

The following is an interim guide that School Districts may use as a tool to develop their own **"Reopening Schools during COVID-19 Plan."** The guide includes areas that Districts may need to consider when reopening their schools and should not be considered an all-inclusive template. This interim guidance is based on what is currently known about the transmission and severity of coronavirus disease 2019 (COVID-19). ***Poms makes no declarations that the guide maintains compliance with any regulatory requirements.***

Purpose: Schools, working together with local Health Departments, have an important role in slowing the spread of diseases. Ensuring a healthy environment is essential. Schools serve students, staff, and visitors from throughout the community. All may have close contact in the school setting. A Leadership Statement should summarize the responsibility of reopening schools, and the importance of the students and employees in mind.

1. **Responsibility**
   a. Include a summary message emphasizing the importance of, and encouraging the responsibility of, all employees and management playing a positive role in the process of maintaining a safe and healthy school.
   b. Identify the key persons involved in the development, maintenance, and communication components of the program.
      1. School Board, Superintendent, HR, Legal, Risk Management, Finance, IT, and/or others as necessary
      2. Appoint a School Safety Coordinator (and at least 1 alternate) or committee who will be responsible for addressing COVID-19 issues and their impact on schools.
   c. Provide flexible timelines for program review and revision given the best practices, local jurisdictional guidance, and information as it evolves; communicate regularly and consistently with all school employees.
   d. Implement your version of the "Guide to Reopening School Plan."
   e. Develop COVID-19 Emergency Response Procedures/Protocol for employees and students exhibiting virus symptoms, including providing quarantine and first aid rooms.
   f. **Coordinate with local health officials.** Once learning of a COVID-19 case in someone who has been in the school, immediately notify local health officials. These officials will help administrators determine a course of action for their childcare programs and/or schools.

2. **Identify Affected Groups**
   a. Students
   b. Administrators: Office Manager, Principal, Vice Principal, Receptionist, Nurse
   c. Faculty: Teachers, Teacher's Aides, Program Assistants, Contract Teachers (Special Ed, Music, P.E., etc.)
   d. Staff: Custodians, Maintenance &Grounds Workers, Kitchen, Library Staff, Bus transit operators.

e. Parents/Family/Relatives: Student Pickups/Drop-offs, Parent-Teacher Conferences.

f. Routine Visitors: Courier Deliveries, Food Service Providers, Computer/Printer repair Technicians.

g. Occasional Visitors; Inspectors, and Local Jurisdiction Agencies (Police & Fire).

h. General public (example: school fund raisers)

i. Solicitors and Salespersons

j. Interviewees/Applicants

k. Others

3. **Logistical Considerations**

a. Parking (ADA, Visitor, and Employees)

b. Emergency Vehicle Access Routes

c. District Buildings & Systems Management

1. District Office
2. Maintenance, Operations and Transportation Buildings
3. District-Owned Vehicles, Equipment, Tools
4. HVAC Systems
5. Utility/Server Rooms
6. Elevators (if applicable)

d. Fire Systems (Alarm Panel, PIV's, Risers, Strobes, Alarm Pulls, Fire Extinguishers)

e. School and District Office layout

1. Configuration
2. Engineering controls (signage, floor markings, partitions, and roped areas)
3. Administrative controls (communications, policy, procedures)
4. PPE Requirements

f. Break rooms/Lunchrooms/Kitchens

1. Vending Machine Use and Cleaning
2. Refrigerators Use and Cleaning
3. Microwaves/Coffee Makers Use and Cleaning
4. Meals: encourage meals brought from home, or school provided individually plated meals. If a school event, use pre-packaged food (instead of potluck and/or buffet style).
5. Stoves/Ovens - use and cleaning
6. Utensils (use disposable whenever possible)

g. Copy and Office Supply Rooms use and cleaning

h. Classroom and Teacher Prep Room (space seating/desk 6 ft apart when feasible)

1. Turn desks to face in the same direction (rather than facing each other), or have students sit on only one side of tables, spaced apart.

i. Library (space seating/desk 6 ft apart when feasible)

j. Multipurpose Room (space seating/desk 6 ft apart when feasible)

k. Outdoor Amphitheater (space seating/desk 6 ft apart when feasible)

l. Gymnasium (space activity participants 6 ft apart when feasible)

m. Swimming Pool – minimize risk (follow local agency and/or CDC recommendations)

n. Weight Room – minimize risk (follow local agency and/or CDC recommendations)

o. Mat Room – minimize risk (follow local agency and/or CDC recommendations)

p. Locker Rooms minimize risk (follow local agency and/or CDC recommendations)

q. Playground Structures - minimize risk (follow local agency and/or CDC recommendations)

    1. Close if possible; otherwise stagger use and disinfect in between use.

r. Playground Area - minimize risk (space activities at least 6 ft apart)

s. Theater (space seating 6 ft apart when feasible)

t. Stage area (space seating and/or desk 6 ft apart when feasible)

u. Nurses office (limit number of students in office at one time)

v. Board Room (space seating 6 ft apart when feasible)

w. Conference/Meeting Rooms (space seating 6 ft apart when feasible)

x. School Bus minimize risk (follow local agency and/or CDC recommendations)

    1. Create social distance between children (for example, seating children one child per seat, every other row) where possible.

y. Cafeteria/Dining Room (space seating 6 ft apart when feasible)

    1. Close if possible; otherwise stagger use and disinfect in between use.

    2. Consider serving meals in classrooms instead.

4. **Timeframe & Decisions** (maintain flexibility)

a. Opening Office to Staff

    1. All at once or phased in?

    2. All office personnel, or just essential personnel?

    3. Regular school bell schedule or staggered schedules?

    4. Work from home options and availability?

    5. "Opt-in" voluntary Return to Work, or Work from Home?

b. Opening Office to Visitors

    1. Appointment only, or walk-ins acceptable?

    2. * Establish policy for visitors which should be communicated to both employees and visitors and their employers.

5. **Procedures/Activities**

a. Medical Screening (See HR & Logistics)

    1. CDC Screening Protocol/Procedures

    2. COVID-19 Questionnaire updating as needed

    3. Daily Superintendent/Principal COVID-19 status communication

b. Consider postponement of extracurricular group activities, school based After School Programs, and large events (e.g., assemblies, field trips, and sporting events).

    c. Discourage staff, students, and their families from gathering or socializing anywhere. This includes group childcare arrangements, as well as gathering at places like a friend's house, a favorite restaurant, or the local shopping mall, as directed by local health officials/CDC.

6. Communicate with Staff, Parents, and Students

    a. Identify Information Officer to employees (Principal, Superintendent, etc.)

    b. Coordinate with local health officials to communicate dismissal decisions and possible COVID-19 exposure. This type of communication to the school community should align with the communication plan in the school's Emergency Operations Plan.

    c. Include messages to counter potential stigma and discrimination of those with COVID-19.

        1. In such a circumstance, it is critical to maintain confidentiality of the student or staff member as required by the Americans with Disabilities Act and the Family Education Rights and Privacy Act.

    d. Developments/Procedures

        1. Procedures for daily school arrivals and dismissals

    e. Training Decisions on Best Practices, PPE, etc.

        1. Where to conduct training if physical location? (schools or District locations)

        2. Who receives the training? (groups, or all employees)

        3. How and Who conducts training? (Live or Online)

7. Cleaning/Disinfecting

    a. Exposed Areas

        1. Close off areas used by the individuals with COVID-19 and wait if practical before beginning cleaning and disinfection to minimize potential for exposure to respiratory droplets.

        2. Open outside doors and windows to increase air circulation in the area. If possible, wait up to 24 hours before beginning cleaning and disinfection.

    b. Personal Hygiene

        1. Self-cleaning opportunities by all employees and students

        2. Types of products available and locations

            i. Disinfectant Wipes & Tissues

            ii. Cloth Face Coverings (if feasible)

            iii. Gloves and Hair Nets for Kitchen Staff

            iv. Soap & Hand Sanitizers (at least 60% Alcohol)

            v. Hand Drying Capability (Paper Towels and/or Air Blowers)

            vi. No-Touch Foot Pedal Trash Receptacles

8. Continuity of Education & Meal Programs

    a. Ensure continuity of education with Continuity Plans, including plans for the continuity of teaching and learning. Implement e-learning Plans, including digital and distance learning options as feasible and appropriate. Ensure continuity of meal service and delivery programs.

b. Determine, in consultation with School District officials and/or other state or local partners:
   1. If a waiver is needed for state requirements of a minimum number of in-person instructional hours or school days (seat time) as a condition for funding.
   2. How to convert face-to-face lessons into online lessons and how to train teachers for online lessons.
   3. How to triage technical issues if faced with limited IT support and staff.
   4. How to encourage appropriate adult supervision while children are using distance learning approaches.
   5. How to deal with the potential lack of students' access to computers and the Internet at home.
   6. Consider ways to distribute food to students, if applicable.

9. **Human Resources**
   a. Health & Wellness
      1. Personal hygiene
      2. Handling Symptomatic Students and Employees
         1. Define symptoms and establish baselines
         2. What if a student and/or employee has a "regular" cold or allergies?
         3. Prepare mental/emotional support for students/staff
   b. Programs & Policy
      1. Update/accessible Injury and Illness Prevention Plan
      2. Review and update Workers Compensation Plan
   c. Screening Employees & Students
      1. Questionnaires
      2. Temperature checks (Medical Exams)
      3. Screening and/or isolation Rooms
      4. Frequency
      5. Privacy
      6. If/When to Require Doctor's Notes

   d. Have a plan for when a staff member, child, or visitor becomes sick
   e. Have a procedure to handling complaints
   f. Identify vulnerable students and employees
   g. Privacy concerns
   h. Leave Policies
   i. Records Retention

COVID-19 Risk Assessment Checklist

POMS

Walk through the workplace and observe things like it was for the first time, find physical items that now pose risks.	Low Med High	Y	N	Date Corrected
1.				
Does item pose a reasonable risk of transferring COVID-19 virus?				
How can it be eliminated or minimized?				
2.				
Does item pose a reasonable risk of transferring COVID-19 virus?				
How can it be eliminated or minimized?				
3.				
Does item pose a reasonable risk of transferring COVID-19 virus?				
How can it be eliminated or minimized?				
4.				
Does item pose a reasonable risk of transferring COVID-19 virus?				
How can it be eliminated or minimized?				
5.				
Does item pose a reasonable risk of transferring COVID-19 virus?				
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Does item pose a reasonable risk of transferring COVID-19 virus?				
How can it be eliminated or minimized?				
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Does item pose a reasonable risk of transferring COVID-19 virus?				
How can it be eliminated or minimized?				
8.				
Does item pose a reasonable risk of transferring COVID-19 virus?				
How can it be eliminated or minimized?				
9.				
Does item pose a reasonable risk of transferring COVID-19 virus?				
How can it be eliminated or minimized?				
10.				
Does item pose a reasonable risk of transferring COVID-19 virus?				
How can it be eliminated or minimized?				

POMS

Walk through the workplace and observe things like it was for the first time, find physical items that now pose risks.	Low Med High	Y	N	Date Corrected
Are there walkways in the office that promote close contact?				
◣ If so, can directional traffic in the office be used to mitigate?				
Are we providing good peace of mind to our staff/visitors/contractors?				
Are cleaning products safe for our employees?				
Are cleaning products safe for our equipment?				
Does everyone understand the reasonable risks of COVID-19?				
Do we restrict access to the workplace to a single entry to monitor visitors and employees?				
Do we provide masks to visitors?				
Do we allow lunchrooms to be used?				
Do we place limits on the number of people in a break room?				
Do we create staggered breaks and lunches?				
Is there a need to redesign or reconfigure space to promote social distancing? Identify locations:				
Are there large spaces that require capacity reduction? Identify locations:				
Are there small spaces that need to be restricted or converted to single occupancy? Identify locations:				
Are new protocols for safety and health checks for employees and visitors going to be implemented?				
◣ If yes, will new or additional equipment or resources be required to implement these protocols? List Items:				
◣ Thermometers provided? If so, how?				
◣ Wipes provided? Explain:				
◣ Sanitizer provided? Explain:				
◣ PPE provided? List types:				
◣ Masks?				
◣ Gloves?				
◣ Goggles / Face shields?				
◣ Other?				
Is PPE training provided?				
Is signage needed? If so, list areas:				
Have all inspections, remediations or repairs been completed?				

Employers should create and implement a plan which addresses the steps taken to protect employees during the COVID-19 pandemic. Whether your written plan has already been created or is in the early stages of development, this tool can assist employers in identifying some of the many elements that should be considered when building a plan.

Phase I – TBD to TBD		
☐ Staff office hours have been established ☐ Evaluation done to determine which employees are required, or need, to be in the office full-time (FT) ☐ Employees who need to come into the office for limited days or times have been identified ☐ Procedures for visitors (vendors, clients, etc.) have been established ☐ A Voluntary or Opt-In Policy for employees has been considered ☐ Staggered schedules have been considered and employees identified ☐ Employees will continue to work from home (WFH) and have been identified ☐ Rosters of employees by category have been created	☐ Janitorial arrangements have been made ☐ Scope & frequency of cleaning has been documented ☐ Cleaning arrangements have been communicated to all staff **Cleaning In-House:** ☐ Ongoing efforts to maintain a clean environment in the office have been evaluated ☐ Supplies have been procured ☐ Protocol for storage and distribution established ☐ Sanitizing stations installed ☐ Soap provided at all sinks ☐ Wipes provided (detail locations) ☐ Other:	
• Can distancing be maintained within the office? ☐ YES ☐ NO • If YES, detail configurations and procedures used to ensure distancing • If NO, detail what additional measures are in place to mitigate potential aerosolized exposure	**PPE: Face Masks** ☐ Face masks have been procured ☐ Face masks are provided ☐ Types of masks have been documented ☐ Face masks are required ☐ Face masks are voluntary ☐ Face mask training is conducted	**PPE: Gloves** ☐ Gloves have been procured ☐ Gloves are provided ☐ Types of gloves have been documented ☐ Gloves are required ☐ Gloves are voluntary ☐ Glove training is conducted
Physical distancing concerns have been evaluated in the following: ☐ Office: ☐ Lobby: ☐ Restrooms: ☐ Break Rooms: ☐ Conference Rooms: ☐ Other:	**PPE: Other Needs Have Been Identified** ☐ _____ have been procured ☐ _____ are provided ☐ _____ have been documented ☐ _____ are required ☐ _____ are voluntary ☐ _____ training is conducted	**PPE: Other Needs Have Been Identified** ☐ _____ have been procured ☐ _____ are provided ☐ _____ have been documented ☐ _____ are required ☐ _____ are voluntary ☐ _____ training is conducted

HR Considerations: Identify Employer Authority

☐ Protocol for coming back into the office in place

☐ Are any employees <u>required</u> to be in the office?

☐ Has returning to work on a voluntary basis during Phase I been evaluated?

☐ Vulnerable employee criteria established

☐ Vulnerable employees identified

☐ Criteria for dealing with symptomatic employees established

☐ Criteria for dealing with complaints established

☐ Working with employees who refuse to come to the office (Are they OFF work or WFH?)

☐ Leave policies evaluated and established

☐ Workers' Comp laws evaluated

☐ Criteria for dealing with suspected or confirmed cases established

☐ Procedures for dealing with a suspected case occurring or evolving within the office established

☐ Procedures for EE's who had COVID-19 and are symptom free established

☐ Privacy issues evaluated and procedures established

☐ Additional accommodations considered

☐ Considerations for employee sensitivity to protocols evaluated for effectiveness (this should be detailed)

Screening Protocol

☐ Are questionnaires used?

☐ Are at-home screenings conducted?

☐ How are screenings or temperatures submitted?

☐ Screening conducted at office?

☐ Protocol established for conducting screening

☐ Criteria established for pass/fail

☐ Potential legal issues evaluated

☐ Counsel provided

☐ Recordkeeping protocol established

Temperature Check Protocol

☐ Voluntary?

☐ Conducted at home and submitted daily with screening?

☐ Conducted in office?

☐ Criteria established for pass/fail

☐ Protocol established for documentation and recordkeeping

☐ Protocols and criteria established for in-office temperature checks

☐ Location(s) identified and evaluated for privacy concerns