

COVID-19 FACILITY REOPENING GUIDE

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As the country continues to face the COVID-19 pandemic and begins planning for the return to the workplace there are several considerations employers and employees need to account for prior to reopening. While details on any expected regulations have been difficult to obtain, it can be expected that individual states will begin providing guidance or even regulations for the safe and healthy return to the workplace. This Facility Reopening Guide provides recommendations based on guidance and regulations from health organizations such as the Centers for Disease Control (CDC), World Health Organization (WHO), Occupational Safety and Health Act (OSHA) of 1970 and state health departments on preparing commercial facilities and businesses for the return to standard business operations.

While the CDC does provide guidance for COVID-19 in workplaces, another important source is OSHA which includes regulations for COVID-19 in the workplace under two clauses and standards.

First, under The General Duty Clause, Section 5(a)(1) of the Occupational Safety and Health (OSH) Act of 1970, 29 USC 654(a)(1), which requires employers to furnish to each worker **“employment and a place of employment, which are free from recognized hazards that are causing or are likely to cause death or serious physical harm.”** Also, under OSHA’s Bloodborne Pathogens standard (29 CFR 1910.1030) which applies to occupational exposure to human blood and other potentially infectious materials. Where respirators are required, employers will also have to comply with OSHA’s Respiratory Protection Standard (29 CFR 1910.134). These standards provide clear requirements of companies to provide safe, healthy environments for their employees.

There are three primary aspects to providing the best chance of success in returning back to business in a safe and healthy manner.

These three aspects include:



**Educate Employees
on How to Safely
Return to Work**



**Establish Safe and
Healthy Business
Operations**



**Preparing a Healthy
Work Environment**

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EDUCATE EMPLOYEES ON HOW TO SAFELY RETURN TO WORK

Even though you may be opening your doors and returning to standard business operations it is important to know that the risk of employees contracting COVID-19 coronavirus is still present and needs to be addressed accordingly. As you begin your communication plan to employees for the return to the workplace make sure to educate them on the proper ways to safely return to work.

Actively encourage sick employees to stay home:

- Employees who have symptoms (i.e., fever, cough, or shortness of breath) should notify their supervisor prior to returning to work and stay home.
- Employees should not return to work until the criteria to discontinue home isolation are met.
- If you become aware of any employee or person visiting your facility who has tested positive for COVID-19 virus, the facility should be disinfected immediately before operations can continue.

Reinforce the importance of personal hygiene procedures:

We have all learned the importance of washing our hands correctly and maintaining personal hygiene. These aspects are even more critical as employees return to the workplace. Educate your employees on the importance of continuing the standard hygiene precautions and ensure they have the necessary tools to do so. This may require installing handwash stations at entryways or refilling restroom soap dispensers more frequently.

Educate employees on any new procedures implemented:

As your employees begin returning to the workplace, it may be necessary to implement new policies and procedures to prevent the spread of the virus. It will be important to educate all employees of the new policies and provide the necessary tools for adherence to the procedures.

Some recommendations to consider include:

- Limiting meetings to no more than 10 people.
- Ensuring social distancing rules can be followed in all meetings and gatherings allowing a minimum of 6' between employees.
- Staggering break times to limit the number of employees using common areas at the same time.
- Limiting the use of common equipment or devices such as printers and copiers.
- Setting up temporary workstations to allow a minimum of 6' between employees.
- Opening additional access points to the building to limit traffic congestion.
- Staggering work hours to reduce employee density.

ESTABLISH A SAFE AND HEALTHY BUSINESS OPERATION

Identify a workplace coordinator who will be responsible for COVID-19 issues and their impact at the workplace.

Implement flexible sick leave and supportive policies and practices.

- Ensure that sick leave policies are flexible and consistent with public health guidance and that employees are aware of and understand these policies.
- Maintain flexible policies that permit employees to stay home to care for a sick family member or take care of children due to school and childcare closures.
- Additional flexibilities might include giving advances on future sick leave and allowing employees to donate sick leave to each other.
- Employers that do not currently offer sick leave to some or all of their employees may want to draft non-punitive “emergency sick leave” policies.
- Employers should not require a positive COVID-19 test result or a healthcare provider’s note for employees who are sick to validate their illness, qualify for sick leave, or to return to work. Healthcare provider offices and medical facilities may be extremely busy and not able to provide such documentation in a timely manner.

Consider establishing policies and practices for social distancing.

Social distancing should be implemented if recommended by state and local health authorities. Social distancing means avoiding large gatherings and maintaining distance (approximately 6 feet or 2 meters) from others when possible (e.g., breakrooms and cafeterias). Strategies that business could use include:

- Increasing physical space between employees at the worksite.
- Increasing physical space between employees and customers (e.g., drive through, partitions).
- Implementing flexible meeting and travel options (e.g., postpone non-essential meetings or events).
- Delivering services remotely (e.g. phone, video, or web).
- Delivering products through curbside pick-up or delivery.

Employers with more than one business location are encouraged to provide local managers with the authority to take appropriate actions outlined in their COVID-19 response plan based on local conditions.

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PREPARING A HEALTHY WORK ENVIRONMENT

Consider improving the engineering controls using the building ventilation system.

This may include some or all of the following activities:

- Increasing ventilation rates.
- Increasing the percentage of outdoor air that circulates into the system.

Disinfect the workplace environment:

- Disinfect all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails, and doorknobs.
- If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection.
- For disinfection, use EPA-registered household disinfectants. A list of products that are EPA-approved for use against the virus that causes COVID-19 is available online.
- Follow the manufacturer's instructions for all cleaning and disinfection products (e.g., concentration, application method and contact time, etc.)

CDC GUIDANCE ON HOW TO CLEAN AND DISINFECT

Hard (Non-porous) Surfaces

- If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection.
- For disinfection, EPA-registered disinfectants should be used.
 - Follow the manufacturer's instructions for all cleaning and disinfection products for concentration, application method and contact time, etc.

Soft (Porous) Surfaces

- For soft (porous) surfaces such as carpeted floor, rugs, and drapes, remove visible contamination if present and clean with appropriate cleaners indicated for use on these surfaces. After cleaning:
 - If the items can be laundered, launder items in accordance with the manufacturer's instructions using the warmest appropriate water setting for the items and then dry items completely.
 - Otherwise, use products that are EPA-approved for use against the virus that causes COVID-19 and that are suitable for porous surfaces.

CDC GUIDANCE ON HOW TO CLEAN AND DISINFECT CONT.

Electronics

- For electronics such as tablets, touch screens, keyboards, remote controls, and ATM machines, remove visible contamination if present.
 - Follow the manufacturer's instructions for all cleaning and disinfection products.
 - Consider use of wipeable covers for electronics.
 - If no manufacturer guidance is available, consider the use of alcohol-based wipes or sprays containing at least 70% alcohol to disinfect touch screens. Dry surfaces thoroughly to avoid pooling of liquids.

When Cleaning

- **Wear disposable gloves and gowns (or disposable protective suits) for all tasks in the cleaning process, including handling trash.**
 - Additional personal protective equipment (PPE) might be required based on the cleaning/disinfectant products being used and whether there is a risk of splash.
 - Gloves and gowns or protective suits should be removed carefully to avoid contamination of the wearer and the surrounding area.
- **Wash your hands often** with soap and water for 20 seconds.
 - Always wash immediately after removing gloves and after contact with a person who is sick.
 - Hand sanitizer: If soap and water are not available and hands are not visibly dirty, an alcohol-based hand sanitizer that contains at least 60% alcohol may be used. However, if hands are visibly dirty, always wash hands with soap and water.

REFERENCES

<https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>

<https://www.osha.gov/Publications/OSHA3990.pdf>

<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1030>

<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134>

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