

Considerations for Returning to Work: A COVID-19 Checklist for Employers

Summary:

There are many issues to consider when planning for employees to return to the workplace. While the requirements for creating a modern, post-COVID-19 workplace span virtually all departments (managerial, HR, legal, IT, janitorial), it is important not to get overwhelmed. We recommend breaking these issues into two clear categories: items that you can address NOW and those to keep track of for future action. With this in mind, this document is organized as follows:

1. **What We Know Today (and should start discussing):** Includes issues that employers should start discussing and considering as part of their return-to-work planning. These involve time-consuming policy considerations as well as potential upgrades to office space.
2. **What We Don't Know Yet (but need to be actively aware of):** There are a number of regulatory and legal issues employers need to track as this situation develops. There is only so much information available regarding vaccines, testing, and evolving state and federal requirements at this time. We recommend being aware of and staying current with regards to these issues to ensure compliance with local, state, and federal authorities and best practices for handling this situation over the coming months.

Focus on Resilience: Organizational efficacy and resilience will result from establishing a framework for managing this crisis on an ongoing basis. Putting protocol in place to switch back-and-forth between Working From Home (“WFH”) and working on-site will drive performance and productivity through the duration of this (and any future) crisis. Making your team(s) feel safe and accommodated will ensure their willingness to be open and engaged with management as they lead employees through these changing times. This is a hard moment for everyone. Let compassion guide you.

WHAT WE KNOW TODAY (and should start discussing):

1. **Establish an Internal COVID Task Force for Your Business:** This team should be responsible for creating, managing, and enforcing your COVID policies. Remember: all policies and efforts should be oriented around conveying a sincere interest in establishing the comfort and safety of your team. Topics of discussions should include:
 - a. **Development of Detailed Plans for Returning Employees to Work** - this should include a clear business case for the transition and for each returning employee
 - b. **Implementation of COVID-related Internal Policies**
 - c. **Training Employees on Any New Policies**
 - d. **Enforcement of Those Policies** – who is responsible for tracking compliance?
 - e. **Liability Review/Management** – initial and ongoing legal risk review
 - f. **Tracking Regulatory/Governmental Policy Updates and Communication** – what is the latest information available in each area where you do business?
 - g. **Ongoing Communication to Your Team** – who keeps your team updated on the policies mentioned above?

2. **Managing Physical Workspaces in a New COVID-19 Reality:** Physical workspace modifications will be required, particularly for offices with shared or communal spaces and cubicles.
 - a. **Seating/Work Stations:**
 - Creating distance between desks: separating desks and work stations. If you have an open floor plan, how will you modify it before your employees return to ensure at least 6 feet of distance at all times?
 - Will you space each seating area further apart and/or will you add partitions?
 - How will you ensure that on any given workday, the density in each area is kept to a minimum?
 - b. **Communal Area Management:** Consider closing or modifying common/conference rooms and break rooms/cafeterias
 - Create a new maximum occupancy for each communal room that reflects social distancing parameters
 - Will masks be required in these areas?
 - Consider removing chairs from large conference rooms or communal areas to discourage density
 - Modify high-touch surfaces by (for example) replacing latch-based doorknobs or handles with doors that can be easily pushed open or closed. Consider similar solutions throughout your space.
 - c. **Review Other High-Risk Areas:** Consider new policies concerning the management, sanitation, and possible closure of certain areas including:
 - Elevators/lobbies

- Kitchens/coffee/snack areas – consider single-use snacks and beverages only
 - Vending machines
 - Communal printers
 - Storage Facilities
- d. **Entry/Exit Locations:** Consider creating a designated single entry and single exit location that are different. This will lower congestion in reception areas and create a method for tracking arrivals and departures to monitor numbers/density.
- e. **Potential General Upgrades**
- Touchless Doors – entrances, offices, elevators
 - Touchless Bathrooms
 - Single-use Bathrooms
 - Ventilation Upgrades – Improved air filtration and circulation may decrease risk to employees
- f. **Signage:** Displaying signs reminding employees of the following:
- To maintain 6 feet of distance at all times
 - To wash hands properly and regularly
 - To wear a face covering where social distancing is not possible or unlikely to be effective.
 - Instructing employees not to use other employees' workspaces or equipment
 - Of availability of hand sanitizer and other sanitization/PPE equipment
- g. **PPE Equipment Availability and Disposal:** Obtain and provide adequate PPE and make it available throughout the workplace. This includes masks, gloves, hand sanitizer, sanitizing wipes and places to dispose of them
- Hand sanitizer and wipes should be made available in all common areas
 - Consider a dedicated station for visitors to use when they arrive
3. **Create a Transition Plan for Employee Return to the Workplace:** This includes understanding which employees are comfortable and/or able to return. The initial planning considerations should be driven by employee feedback
- a. **Discuss WFH Feedback from Managers:** ask managers how WFH has impacted their team thus far
- What have they learned and what would they change going forward?
 - How is team morale?
 - How is team productivity?
 - Are there teams/groups that would benefit from returning to the office?
 - Are there teams that can move to WFH for the near future?
- b. **Poll Your Employees** – depending on your organization and/or individual team, it may be useful to create an anonymous survey to request feedback on returning to work. Some employees may be uncomfortable with providing direct feedback

regarding challenges or discomfort with returning. An anonymous poll for each team can assist you. Sample questions:

- How do you feel about returning to the office? (1: Not Eager, 10: Very Eager)
 - What actions would you like us to take before you return to the office?
 - How effectively has your team been working remotely? (1: Not Effective, 10: Very Effective)
 - What would aid in your ability to effectively WFH longer-term?
- c. **Discuss With Your Employees Directly:** In addition, encourage managers to have one-on-one calls with each direct report to understand their needs/feelings around returning to work. Some employees will be unwilling or unable to start working in-person based on
- Lack of childcare
 - Reliance on public transit
 - Illness / Underlying conditions / risk
 - Family illness / risk
 - Anxiety about COVID transmission
- d. **Ask for Volunteers First, Then Review Business Case for Their Return:** The first employees to return should be volunteers. Managers should review if these employees are necessary and/or useful onsite vs. working remotely
- e. **Create Options for Your Employees:** For less eager employees, providing scheduling options for returning to work will enable them to choose what suits their needs and level of comfort
- f. **Continue to Support Remote Work:** Employees will still need to work remotely for a portion of their time, particularly if the pandemic requires future shelter-in-place orders before it is resolved. There should not be a reward for choosing to come into the office vs. working from home
- g. **Consider Employee Return on a Case-by-case Basis:** Employees may have challenging personal situations that make returning to work very difficult. Have a contingency plan for long-term WFH personnel
4. **Rolling Attendance/Review Options Alternating Schedules** – What is the goal of returning your employees to the office? How can you best achieve these goals while staggering employee attendance?
- a. **Create Rolling Schedules:** Create and distribute schedules that limit the number of employees at any site while leveraging the benefits of in-person attendance
 - b. **Consider Off-Peak Hours:** Some employees may be more comfortable returning to work during non-peak hours (nights, weekends) to minimize contact. Consider which employees could benefit from these schedules
 - c. **Consider Staggering Start/End Times:** tweaking hours can provide employees the flexibility to work around childcare/personal needs and will keep density to a minimum

5. **Preparing for Employees to Return to Work:**

- a. **Pre-return Training:** Prior to returning to work, employee should be provided communications regarding the new policies related to meetings, work schedules. This communications should be regarding general policies and changes. This should also include a mechanism for employees to provide feedback and ask questions.
- b. **Day-1 Training:** You should provide training for employees on their first day back to notify them of new policies and best practices. This should include:
 - A tour of the office (pointing out high-risk areas),
 - An overview of your company’s social distancing policies
 - A summary of new “touchless” office policies such as avoiding handshakes and other efforts to limit physical contact
- c. **Welcome Back Kits / Care Packages:** Employees should be provided with welcome-back kits of masks, gloves and hand sanitizer or other materials that will assist them in following your new protocols
 - Consider including additional items to provide comfort during what will be a stressful transition. This can include toys, personalized notes, or other treats designed to raise spirits
- d. **Regular Feedback / Check-ins:** Institute a policy of regular check-ins for employees that have returns to in-office work. What is working? What needs improvement?
 - Set up an anonymous method for providing feedback for those uncomfortable discussing in-person (like an anonymous email address or a “suggestion box” they can drop written feedback into)

6. **Establish Policies for Ongoing in-Person Interaction to Limit Risk of Infection:** Limiting in-person interactions and physical contact will be critical

- a. **In-person Internal Meetings:** Holding fewer in-person meetings and using conference calls or video conferences. If in-person meetings are necessary, limit the size of the gathering (for example: no more than 3 people at a time)
- b. **In-person Meetings Including External Visitors:** How many meetings involving external visitors will be scheduled per day?
 - Will you set up a specific conference room/space that will be used for external visitors?
 - How many visitors will you accommodate per group?
 - Will visitors be required to wear PPE/masks?
 - Conferences – communicate policy on conference attendance (assume will be prohibited for the foreseeable future)

7. Establish Protocols for Onboarding New Hires

a. Establish New Hire Training

- Reading-based training and sign-off: will you create a new handbook of training materials for new hires? How will they acknowledge your new in-office policies?
- Physical Training Around Each Office Site: who will be in charge of training new employees on the use of communal areas?

b. Onboarding for Remote Workers: will you create a handbook of policies for remote workers? How will new remote-only or hybrid-remote employees be trained and acknowledge your policies?

c. Policy and Training Enforcement: who will enforce any violation of policies? What will be the consequences for non-compliance?

8. Cleaning / Disinfecting Best Practices:

a. Discuss Best Practices with Janitorial Staff/Vendors: cleaning and disinfecting may require additional steps (including reviewing and renegotiating contracts with vendors that provide these services). Ensure they are using disinfectants with at least 70% ethanol alcohol

b. Employee Participation: Consider if employees will be required to be responsible for cleaning/disinfecting communal areas on a set schedule during the workday?

c. Track Cleaning and Keep Records: Keep records of the sanitization of high-traffic areas to ensure adherence to policies

9. Review Other Office Policies and Change As-Needed:

a. Travel Policy: Review all travel including to client and customer meetings and events. Issues to consider:

- When/how will travel resume?
- Will travel between internal business sites resume?
- How do you differentiate “essential travel” from “non-essential travel”?

b. Meals: If your business regularly provides meals to your employees, you may reconsider the following:

- Will you continue to offer meals to employees?
- If so, will you be establishing staggered schedules for pick-up
- Consider switching from buffet offerings to individual packaged meals

c. Delivery Policies: Appoint a “Delivery Captain” in charge of sanitizing all incoming deliveries before they are placed in a communal space. Request that employees have personal packages delivered to their homes to reduce volume

10. **Intangibles and Culture:** Reorient your company's internal identity to include COVID Best Practices
 - a. **Culture:** How do the requirements of this new reality impact your culture?
 - b. **Focus on Employee Health and Safety:** communicate a focus and emphasis on employee safety and wellness
 - c. **Listen and Be Flexible:** be willing to work with every employee to find a solution that suits them. Every person and team will have unique needs and challenges
 - d. **Ensure Consistent Consideration/Treatment:** do not offer disparate benefits or treatment for employees and managers. Your team should feel supported because: we are all in this together
 - e. **Check-in Regularly to Ensure Comfort:** your workforce will go through a significant change with these new policies. Check in regularly with your team to confirm that everyone is on-board and being accommodated appropriately
 - f. **Be Willing to Make Adjustments As-Needed:** your team's needs and comfort levels may change over time. Be willing to be flexible and understanding

WHAT WE DON'T KNOW YET (but need to be aware of):

1. **Regulatory Issues:** It will be critical to track requirements issued by each local/state and federal authority
 - a. OSHA
 - b. CDC
 - c. WHO
2. **Legal Issues:** Liability Management
 - a. Understand legal issues relating to following local/state/federal authority guidelines
 - b. Implement policies on an ongoing basis to ensure adherence to all policies, guidelines and laws
3. **Testing:** Implementing a testing policy for employees for COVID-19
 - a. Employer-sponsored testing and tracing appears likely to become the norm. Testing will need to be widely available outside of a traditional clinical testing environment.
 - b. Employees should plan to be tested regularly until there is a reliable antibody test widely available. Another important step, they said, was communicating clearly to workers that they will not lose income if they get sick and stay home. Otherwise, cooperation may suffer
4. **Visitor Testing / Temperature**
 - a. Implementing testing for visiting guests including (but not limited to):
 - i. Requiring a negative COVID-19 test 24 hours prior to arrival
 - ii. Temperature taking upon arrival
5. **Antibody Testing:** Once a reliable test is available (and transmission post-recovery has been confirmed to be unlikely), employees should be provided access to antibody tests

- a. It will be important to track and report antibody testing internally to understand who is safe to travel and engage in in-person meetings
- 6. **Vaccines**
 - a. Availability and access in your area
 - b. Requirements/exceptions
 - c. Tracking vaccinations rates
- 7. **Reporting New COVID-19 Cases**
 - a. Reporting new cases to the City/County
 - b. Reporting new cases and assisting in tracking exposure within your organization, should the need arise
- 8. **Ongoing Childcare Availability**
 - a. Local/state reopening of childcare/schools
 - b. Summer camp/daycare opening and availability for June-August months
- 9. **Additional Potential Benefits for Employees**
 - a. In-house clinicians for testing
 - b. Mental health counseling
 - c. Transportation (if not already offered) should employees lose access to public transport
- 10. **Establishing a Preparedness Plan for Future Pandemics / Reoccurrences**
 - a. Lessons learned
 - b. Best practices for internal and external engagement
 - c. Long-term policies for succession should management be sidelined