



Preparing to Bring Workers Back in the Age of COVID 19: Are you Ready?

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Berchem Moses COVID 19 Resource Page:
<https://www.berchemmoses.com/covid-19-updates/>

Focus Areas

- **Planning for Re-Opening**
- **Addressing Health and Safety Issues**
- **Returning Employees to Work**
- **What's Next?**

PLANNING FOR RE-OPENING

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Phase One of Re-Opening

- Begins May 20th
- Generally allows for hair salons/barbershops, museums/zoos (outdoor only), offices, restaurants (outdoor only and no bars), and retail/malls to reopen if specified criteria are met
- Sector-specific criteria available:
<https://portal.ct.gov/DECD/Content/Coronavirus-Business-Recovery/Sector-Rules-for-May-20-Reopen>.
- Other non-essential businesses may not yet reopen

Applicable To All

- **Capacity limit of 50% for businesses able to reopen**
- **Strict cleaning and disinfection protocols continue**
- **Those who can work from home continue**
- **High-risk groups and those over 65 continue to stay home**
- **Facemasks should continue to be worn in public at all times**
- **Social gatherings restricted to maximum of 5**

Program Administrator

- **Appoint Program Administrator accountable for implementing return to work rules**
- **Management level individual**

Protocols

- **Develop checklists that incorporate DECD requirements**
- **Consider developing Infectious Disease Preparedness and Response Plan**
 - **Evaluate level(s) of risk associated with various worksites and tasks workers perform at those sites**
 - **Detail basic infection prevention measures**
 - **Develop policies and procedures for prompt identification and isolation of sick employees**
 - **Adopt, implement, and communicate workplace flexibilities and protections**
- **Review OSHA's Guidance on Preparing Workplaces for COVID-19 found here**
<https://www.osha.gov/Publications/OSHA3990.pdf>

Develop Required Training

- **Provide at no cost to employees and hold during working hours**
- **Must include sector-specific rules and cleaning protocols**
- **Ensure materials presented in language and at literacy level of employees**
- **Hold weekly refreshers on policies**
- **Include training on proper cleaning procedures to ensure safe and correct application of disinfectants**

Communication

- **Provide key information to employees in return to work notice**
 - **Date of return to work**
 - **Schedule of hours**
 - **Brief summary of facility changes**
- **Inform employees of training requirement**
- **If doing medical screenings, include that in communication**

Self Certification

- All businesses subject to DECD guidelines must self-certify *prior* to opening May 20th
- Certification is online and can be done by going here:
<https://business.ct.gov/recovery>

ADDRESSING HEALTH AND SAFETY ISSUES

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Facilities Cleaning

- Thorough cleaning prior to reopening
- Clean and disinfect bathrooms frequently and implement use of cleaning log for tracking
- Make cleaning and disinfectant products or disposable wipes available near commonly used surfaces
- Use products that meet EPA's criteria for use against SARS-CoV-2 and that are surface appropriate

Facilities Cleaning

- Prior to wiping surface, allow disinfectant to sit for necessary contact time recommended by manufacturer.
- Increase ventilation rates, open windows where possible
- Review and follow CDC Guidelines here <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html> and EPA suggestions here <https://www.epa.gov/coronavirus/guidance-cleaning-and-disinfecting-public-spaces-workplaces-businesses-schools-and-homes>

Maintaining Physical Distance

- **Adopt flexible worksites and work hours**
- **Increase physical space between employees**
 - **May require keeping some desks empty and/or marking desks that should not be used**
- **Limit visitors**
- **Increase physical space between employees and customers**
- **Use visual cues placed 6 feet apart to indicate where to stand when physical barriers not possible**

Maintaining Physical Distance

- **Create flexible meeting and travel options**
- **Close or limit access to common areas**
- **Prohibit handshaking**
- **Designate areas for shipping and deliveries**
- **Use partitions between employees where 6 ft distance cannot be maintained if possible**
- **Ensure employees do not share equipment where possible; if shared, clean after each use**

Maintaining Physical Distance

- **Close or remove amenities non-essential to businesses' main function**
- **Elevators:**
 - **Encourage social distancing while individuals queue using visual markers**
 - **Use signage displaying healthy elevator use protocols, including passenger limits and safe distances in elevator**
 - **Use elevator attendants to manage flow and discourage over-crowding**
 - **Encourage alternatives, such as stairs, where possible**

Employee Health

- Hand sanitizer must be made available at entrance points and common areas, where possible
- Key times for employees to clean hands include:
 - Before and after work shifts
 - Before and after work breaks
 - After blowing their nose, coughing, or sneezing
 - After using bathroom
 - Before eating or preparing food
 - After putting on, touching, or removing cloth face coverings

Employee Health

- **Remind employees to avoid touching their eyes, nose, and mouth with unwashed hands**
- **Gloves and eye protection are required when using cleaning chemicals**
- **Discourage workers from using other workers' phones, desks, offices, or other work tools and equipment**

Employee PPE

- All employees must wear mask that completely covers nose and mouth, unless doing so would be contrary to employee's health or safety due to medical conditions
- Employees may utilize their own cloth face covering instead of that provided by employer
- Employees must wear mask from time they enter building until time they arrive at workstation and any time they leave their work station and move around common areas

Employee PPE

- **Employees working alone in segregated spaces may remove their masks when segregated**
- **Employees working in congregate settings must wear mask at all times**
- **Continuous wearing of masks not required in outdoor workspaces where employees do not regularly come within 6ft of other employees or customers**

Customer PPE

- **Customers and visitors required to bring and wear mask that completely cover nose and mouth unless doing so would be contrary to health or safety due to medical condition**
- **If customer or visitor does not have mask then they either must be provided one by employer or not allowed to enter facility**

Medical Inquiries: Generally

- Use trained nurse/medical professional on-site or management-level personnel to conduct testing
- Maintain log of employees on premise to support contact tracing
- Conduct in-person health checks safely and respectfully
- Follow social distancing guidelines
- Screen as private as possible; maintain data in employee's health file, not personnel file
- Compensate employees for time during testing
- Employees must stay home if sick

Medical Questionnaire

- **Confirm that employee has not experienced COVID-19 and that employee does not have CDC-defined symptoms including:**
 - **Cough,**
 - **Shortness of breath, or**
 - **Any 2 of the following symptoms: fever, chills, repeated shaking with chills, muscle pain, headache, sore throat or new loss of taste or smell**
- **Confirm employee has not been in contact within the last 14 days with someone with confirmed diagnosis of COVID-19**

Taking Employee Temperatures

- Provide temperature taker with PPE (gloves, gown, face mask and face shield or goggles)
- Use equipment requiring minimal contact between temperature taker and employee (forehead scanner)
- Clean thermometer thoroughly between each test
- CDC: 100.4 degrees Fahrenheit or higher
- Do not allow employee to enter work environment with fever

Employee Contracts COVID 19

- **Employees who have symptoms should notify their supervisor and stay home**
- **Employees who appear to have symptoms upon arrival at work or who become sick during workday should immediately be separated from other employees, customers, and visitors, and be sent home**
- **Employees should not return to work until criteria to discontinue home isolation met**
- **Employees who are well but who have sick family member at home with COVID-19 should notify supervisor**

KEY DECD SECTOR SPECIFIC REQUIREMENTS

Hair Shops & Barber Shops

- May reopen by appointment only
- Restricted to hairdressing and eyebrows, nothing that would require removal of facemask
- Waiting rooms closed, customers wait in cars
- Equipment may not be shared among employees, workstations must be rearranged to allow for 6 feet between customers (or partitions must be installed)
- Must have “signage in multiple languages where employees and/or clientele are not native English speakers.”
- Employees must wear face mask that completely covers nose and mouth, unless doing so would be contrary to their health or safety due to medical conditions
- Gloves optional when working with customers, but must be changed between customers if used
- Blow drying only if necessary

Offices

- **Telework still encouraged**
- **Thorough cleaning of all common areas and touch points prior to reopening**
- **Physical modifications to office environment should be made where possible to create 6 feet of distance**
- **Limit visitors; shipping and deliveries must be completed in designated areas**

Restaurants

- Permitted to reopen outdoor seating only
- Limit to parties of up to 5
- Interaction between customers and staff should be limited
- Single-use menus and condiments
- Kitchen and dining operations should be structured to designate discrete zones for employees to work in without overlapping with others

Retails & Malls

- Any clothes tried on by customers must either be quarantined for 48 hours or thoroughly steam cleaned prior to returning to the floor
- Doorways should be single-direction flow where possible
- Physical barriers should be installed at checkout stations
- Discrete work areas should be assigned to employees to limit overlap throughout the store.
- Dining areas in malls subject to restaurant guidance and seating areas must be closed off
- Increased security should be provided to enforce rules and limit congregating patrons

RETURNING EMPLOYEES TO WORK

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Recall Procedures

- **Phasing in return to workplace**
- **Planning for high risk individuals**
- **Notification of unemployment compensation division**
- **How to handle those unable/unwilling to return to workplace**
- **Employee benefit/compensation issues**

Signage

- **FFCRA: Families First Coronavirus Response Act poster found here**
https://www.dol.gov/sites/dolgov/files/WHD/posters/FFCRA_Poster_WH1422_Non-Federal.pdf
- **Hotline for Violations: Clear signage that includes CT hotline (211) for employees and customers to report potential rules violations**

Signage

- **Clear signage reinforcing new policies, including:**
 - **Social distancing protocols**
 - **Cleaning and disinfection protocols**
 - **PPE protocols (face masks, gloves)**
 - **Requirement that employees stay home if sick/experiencing symptoms**

Policy Changes

- **Telecommuting**
- **Paid Time Off**
- **Attendance**
- **Time Off Requests**
- **Flex Time**
- **Travel**
- **Break Time**
- **Technology**

Unionized Employees

- **Obligations to bargain over changes in work conditions**
- **Force majeure**
- **Hazard pay obligations**
- **No-strike clauses**

Unable To Return to Work

- **FMLA+: Childcare**
- **EPSL:**
 - Sick
 - Immunocompromised
 - Caring for at-risk individual
- **Unemployment**

ADA Accommodations

Types of requests

- **Telework**
- **Extended leave**
- **Flexible schedule to reduce exposure or deal with child care obligations with schools/daycare closed**
- **Masks**
- **Hearing impaired individuals because can't read lip their with masks**

WHAT'S NEXT?

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Things to Watch For

- **Subsequent phases of reopening**
- **Updated/changing requirements**
- **Spike in COVID-19 cases**
- **Legal claims**

Links to Agency Specific Guidance

- **Offices**
 - CDC: <https://www.cdc.gov/coronavirus/2019-ncov/downloads/community/workplace-decision-tree.pdf>
 - DECD: https://portal.ct.gov/-/media/DECD/Covid_Business_Recovery/CTReopens_Offices_C4_V1.pdf?la=en
- **Restaurants/Bars**
 - CDC: <https://www.cdc.gov/coronavirus/2019-ncov/downloads/community/restaurants-and-bars-decision-tree.pdf>
 - DECD: https://portal.ct.gov/-/media/DECD/Covid_Business_Recovery/CTReopens_Restaurants_C5_V1.pdf?la=en
- **Salons**
 - CDC: See "workplace" flowchart link above
 - DECD: https://portal.ct.gov/-/media/DECD/Covid_Business_Recovery/CTReopensHairBarbershopsC4V1.pdf?la=en
- **Retail/Malls**
 - CDC: See "workplace" flowchart link above
 - DECD: https://portal.ct.gov/-/media/DECD/Covid_Business_Recovery/CTReopensRetail-C4V1.pdf?la=en

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