



# 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/zoo (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 20<sup>th</sup>
- 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

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# 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](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](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](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](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](https://portal.ct.gov/-/media/DECD/Covid_Business_Recovery/CTReopensRetail-C4V1.pdf?la=en)

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