



May 1, 2020

Return to the Workplace Employee Policies & Safety Measures

Although returning to the workplace may not be returning to what we were accustomed to, our goal is to help make the transition back to business as smooth as possible. With your employees' health and organization's priorities top of mind, we developed a list of initial considerations for you to explore as you define your return to the workplace program. In addition to the below list of considerations, we have offered resources, when applicable.

We recognize that each company will implement different variations of these considerations depending on the nature of your business, industry best practices, and other requirements. Additionally, we encourage you to review local and State government orders, as well as seek legal guidance for any protocols you choose to implement, when you deem appropriate.



Employee Health Considerations

- Check with your local State, County, City Government officials or work organization to determine if you will require employees to wear masks or other personal protective equipment. If so, communicate if your organization will provide those items and/or define the standards if employees are to supply their own. Please review the resources below to help you with this consideration.
 - <u>CDC</u> describes the use of face coverings to help slow the spread of COVID-19.
 - Comply with any regulations issued by your OSHA jurisdiction.
 - Federal OSHA Guidance on Preparing Workplaces for COVID-19
 - Federal OSHA Personal Protective Equipment
 - Check with your state and local Public Health Departments for up to date guidance.
- 2. Conduct health screenings such as temperature checks with a touchless infrared thermometer, health questionnaires, etc. You may also consider providing employees thermometers to monitor themselves before arriving to your premises. Review the resources below for more guidance on this topic.
 - The FDA has offered a policy for electronic thermometers.
 - CLIA provided regulations for medical equipment.
 - The EEOC has issues guidance on temperature checks.
 - MMA has identified vendors who can conduct screenings.
 Please contact your MMA team for information about these resources.
 - Consider using the free COVID-19 <u>screening tool developed</u> <u>by Apple</u> in Partnership with the CDC and download the free app from Apple's App Store.
- 3. If you choose to conduct health screenings, establish a privacy policy to ensure employees' personal information is protected. We



have provided resources below to help you shape this.

- <u>Sample policies</u> are available from SHRM.
- Federal OSHA provides record keeping requirements.
- 4. Provide employee education regarding handwashing, coughing etiquette, and any cleaning procedures the company has implemented. A number of resources have been identified below.
 - Information about how <u>COVID-19 spreads</u>, as prepared by the CDC.
 - Proper handwashing as suggested by the CDC.
 - Face Mask Wearing Guide prepared by MMA, sourced from the World Health Organization (WHO) and San Francisco Department of Health.
 - View a <u>list of disinfectants</u> for use against COVID-10 provided by the EPA.
 - The <u>CDC offers pre-made posters on a variety of topics</u>, available in both English and Spanish.
- 5. Identify and communicate preferred greeting methods (i.e. excluding handshakes, hugs, etc.). Suggestions and resources are provided here.
 - Exploratorium offers greetings in the time of COVID-19.
 - The World Health Organization (WHO) developed suggestions for greetings.
- 6. Develop a process to identify higher risk individuals and determine the type of flexible work plans you will offer them.
 - The <u>CDC provides information</u> about who is at a higher risk for severe illness.
 - Federal OSHA outlines low to very high-risk job information.



- Continue to encourage sick employees to stay home and develop a plan for what to do if an employee becomes sick at work. Some suggestions and comments pertaining to this topic are below:
 - Employees who have symptoms (i.e., fever, cough, or shortness of breath) should notify their supervisor that they are ill and stay home.
 - Employees who appear to have symptoms (i.e., fever, cough, or shortness of breath) upon arrival at work or who become sick during the day should be sent home.
 - Employees who are ill should be encouraged to follow the steps listed below recommended by the CDC:
 - Stay at home, get rest, stay hydrated.
 - Communicate with your health provider.
 - Be sure to get care if you have trouble breathing or if you think it is an emergency.
 - Employees should not return to work until the criteria to discontinue isolation are met in accordance with healthcare providers, state and local health departments, and company policy.
 - Employees who are well but who have a sick family member at home who has been diagnosed with COVID-19 should notify their supervisor and maintain quarantine in accordance with healthcare providers, state and local health departments and company policy.
 - EEOC Employer Rights.
- 8. Identify and share suggested actions for employees if they believe they have been exposed. The references below are relevant sources you may want to provide employees.
 - <u>CDC Symptoms of Coronavirus</u>
 - <u>CDC Self-Checker</u>



Employee Benefits Resources & Considerations

Work with your MMA team to communicate with your employees about the resources available to them through your benefits program, such as:

- Employee Assistance Program (EAP)
- Telehealth program resources
- Medical Carrier COVID-19 coverage information
- Financial assistance, loan programs, etc.
- Wellness program resources

Supplement the resources offered through your benefits program with additional information such as the following:

- MMA Employee Resource Guide.
- MMA Financial Wellness Resources included <u>Budget</u> <u>Friendly Activities</u>, <u>Stimulus Check Strategies</u>, and more found on the MMA Coronavirus Resource Page under <u>Financial Wellness</u>.
- 1. Communicate information about where employees can go if they are seeking testing.
 - The CDC has information about <u>Testing in the United States</u>.
 - GoodRx also published information about <u>drive-thru</u> <u>testing</u>.
- 2. Provide childcare support and resources, if available.
- 3. Encourage employees to receive annual medical exams and care for their overall health.

Work Environment & Physical Distancing Considerations

- 1. Develop a phased approach or staggered work shifts for employees.
- 2. Develop a process for proper, enhanced workplace cleaning (e.g. partner with cleaning company).



- The CDC offers considerations for employers regarding how to clean and disinfect.
- For commonly used items in the breakroom such as the refrigerator door handle, microwave, coffee machine or water dispenser, consider how you will maintain the cleanliness of those items, remove them and/or replace them with touch-free counterparts.
- Consider supplying employees with disinfectant wipes or hand sanitizer, if available.
- Per your Hazard Communication Program, train employees on the Safety Data Sheets for each disinfectant and sanitizer introduced into the workplace.
- 3. Determine if you will close off certain entrances or exits to your building. Be sure to comply with proper exit routes, should there be an emergency that require your employees to leave the building.
- 4. Implement and communicate social and professional distancing protocol. This may include:
 - Enforcing limit count in restrooms, breakrooms, lunchrooms, meeting rooms, designated smoking areas, etc.
 - You may also need to evaluate the need to rearrange tables, chairs, or other items in common areas.
 - Altering your floor plan, adding in protective elements, or other measures.
 - Adjusting the square footage per person permitted onsite your premises.
 - Implementing physical space between individuals through partitions or other mechanisms.
 - Social distancing guidelines are offered by the CDC.
- 5. Much like you may have safety ambassadors in your building (i.e. employees who are designated to play a role during an emergency), consider identifying 'social-distancing ambassadors' to remind your employees of your protocols in place.



- 6. Communicate in-person meeting guidelines such a limiting attendee count and recommendations for virtual meetings, even while in the same physical location.
- 7. Develop guidelines for visitors (e.g. only "essential" visitor meetings permitted, limit attendee count, etc.).
- 8. Consider suspending the use of standing desks in open floor plan arrangements without proper high partitions. This may prevent cough or sneeze droplets from traveling in an unwanted direction.

Additional Information & Company Policy Considerations

- 1. Develop a business continuity procedure to "contain, plan, mitigate, and follow up" if a workers tests positive for COVID-19 in the workplace. This may include but is not limited to:
 - Employee/ Vendor tracking
 - Quarantine and return to work procedures.
 - Identifying areas that were affected to determine: equipment shutdown, production adjustments, or complete shutdown
 - Scope of cleaning procedures
- 2. Develop policies and procedures regarding when employees should be allowed to return to work following isolation and/or quarantine.
 - The <u>CDC offers guidelines</u> regarding this topic.
- 3. Develop a plan for how and when to lift business travel restrictions.
 - The CDC regularly updates the <u>Travel page related to</u> <u>COVID-19</u>, which may help inform your plan for business travel.
- 4. Be prepared for continued remote work employee requests. Implement expectations or a policy moving forward.

For your reference:

 According to OSHA regulations, employees may only refuse to work if they believe they are in imminent danger. Section 13(a) of the Occupational Safety and Health Act (OSH Act)



defines "imminent danger" to include "any conditions or practices in any place of employment which are such that a danger exists which can reasonably be expected to cause death or serious physical harm immediately or before the imminence of such danger can be eliminated through the enforcement procedures otherwise provided by this Act."

- <u>SHRM provides guidance</u> on employee absenteeism due to fear of Covid-19.
- 5. Review additional information available from Marsh & McLennan Agency and other viable sources to help shape your return to work program.
 - MMA Coronavirus Resource Page
 - MMA CARES Act Information
 - <u>MMA Article regarding Families First Coronavirus Response</u> <u>Act</u>
 - <u>CDC Interim Guidance for Businesses</u>

The chart below highlights a few of the key strategies you may choose to implement from the considerations list. In the row for each strategy, we have noted how simple it may be for your organization to implement the respective consideration, how effective we anticipate the strategy to be, as well as how costly.

Strategy	Implementation Scale (Easy to Difficult)	Effectiveness Score (low 0 – high 5)	Cost
Social Distancing	•	5	\$
Cleaning/Disinfecting	-0	4	\$\$
👰 Masks	— •	3 - 4	\$
Employee Communications		4	\$
(\$) Enhanced paid sick leave policies		4	\$\$\$\$
Screening Questionnaires		2	\$\$
Temperature Screening	—	2	\$\$
🖄 Antibody Screening	•	2	\$\$\$\$
Virus Screening (i.e. Diagnostic)	•	3	\$\$\$\$

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