



COVID-19 Next Steps: Ongoing Planning for Employers

With the outbreak of the COVID-19 pandemic, employers have been inundated with information on preventing the spread of the virus. As we look to the future when some restrictions are lifted, employers may face a new set of unexpected challenges.

Many employers are not familiar with operational shutdowns. Some might be accustomed to short-term shutdowns, i.e., one week or less, for maintenance or other planned purposes. The current crisis is lasting much longer and raises concern for unforeseen exposures and employee safety issues when restrictions lift and employees return to work.

To help employers return to operations and avoid workers' compensation claims and losses, this overview provides:

- Discussion surrounding potential safety issues as normal operations resume; and
- Practical solutions to reduce health and safety exposures and facilitate a safe "return to work" environment.

Potential Workers' Compensation Exposures with Resuming Operations

Consider the following when restrictions lift and operations return to normal:

- What are the potential and/or lingering existing exposures to COVID-19 on the premises?
- What social distancing guidelines should be (or continue to be) implemented? What federal, state and local laws, regulations and guidelines apply in the jurisdiction where operations are located and to the type of operations that will be conducted?

Some of the workforce may have been more sedentary during COVID-19 community restrictions. Which operational areas have an increased potential of strain injuries with returning to work?

- Operations may be running faster than normal upon return to make up time for lost production. What areas could be prone to increased injuries (sprains, falls, machine, etc.) as a result of this?
- How can we convey to employees the need to be attentive in avoiding injuries after a prolonged isolation period?
- Mandatory overtime may be required upon return as well, which can cause fatigue-related injuries.
- Some employees may *not* return after a prolonged shutdown, and new employees may need to be hired.
- Inactive equipment may require maintenance. This could also lead to an accumulation of solvents, leaks, and dust.
- An inadequate supply of personal protective equipment, such as nitrile and latex gloves, respirators and/or masks, and insufficient procedures related to programs, such as respiratory protection, may lead to workers' compensation claims and losses.

Implementation of Potential Controls to Prevent Employee Injuries/Illnesses

Consider the following in preparation for return to production:

- Flow water through the potable water lines for an extended period of time. Water that sits stagnant in water mains, building plumbing lines, and water heaters loses residual chlorine disinfectant and increases the risk of waterborne pathogens such as Legionella colonization.
- Decontaminate the common area/controls in your facility using accepted cleaning agents and following proper protocols, as there is a difference between cleaning and sanitizing a surface. While it is believed that the virus can live only a short time on a surface without a host to live on, it has been detected over 72 hours later on some surfaces, such as stainless steel and plastic. Click [here](#) for CDC cleaning and disinfecting guidelines.
- Implement the following CDC/OSHA recommendations for an extended period of time to limit virus exposure:
 - Continue social distancing with education on six-foot distancing. If workers along a production line/work cell cannot be spaced out, consider a small, clear plastic partition, similar to a welding curtain.
 - Conduct increased cleaning of shared surfaces/equipment, using the proper cleaning chemicals throughout the shift.
 - Bulk up on custodial staff to perform expanded cleaning on a timely basis.
 - Perform staggered work breaks and lunches to reduce the number of employees gathering. If possible, have employees avoid eating in the lunchroom for a short time, until the potential for a second wave of the virus has passed.

- Provide the following:
 - more hand washing/sanitation stations throughout the plant to encourage good hygiene and increase social distancing
 - face masks, especially in those operations where social distancing cannot be maintained
 - latex/nitrile gloves to operators where gloves do not present an increased hazard
- Prop open as many interior doors open as possible; e.g., restrooms, without compromising security and personal safety, to limit the number of common surfaces employees touch.
- Consider having a first aid/CPR trained employee take employees' temperatures with a high-quality calibrated thermometer, preferably one that uses infrared technology to scan the forehead from a distance. Employees with temperatures should be sent home as a precaution. Establish communication protocols if this occurs.



- Develop a written *Infectious Disease Preparedness and Response Plan* that employees can refer to. Clearly state in the policy if personal (non-company provided) respirators are acceptable. Contact ORMARKS Risk Control for assistance at policyservices@ormarks.com.
- Designate one member of the leadership team and one back-up to collect, investigate and address any COVID issues that employees raise. This will help reduce secondhand information and rumors. Inform employees of the designee. The designee should communicate updates to senior leadership and employees weekly or immediately based on the situation.

Plan for an Operational “Restart”

- Hold pre-planning meetings with the production manager, safety director/staff, and front-line supervision *prior* to the full workforce being called back to work, to conduct a start-up risk assessment.
- Attempt to call employees back on a Wednesday to provide a short week to acclimate their bodies to physical exertion again.
- If only temporarily, implement a mandatory pre-shift and post-break stretching program to reduce the potential for strain-related injuries. While these would ideally be tailored to the specific job task, more generic versions could be performed if this is a short-term control.
- Increase front-line supervisor observations to ensure employees are performing their operations safely and not taking shortcuts to make up for lost production.
- Plan for increased new employee safety orientation if a significant number of new hires occurs. This could include a larger training room, more trainers, and more resources. Again, limit social proximity in any classes.

Operational and Equipment Review

- Conduct departmental safety meetings prior to restarting production to address safety expectations and controls to reduce the potential for employee injuries common to your industry. Limit the number of employees in meetings to facilitate social distancing.
- Direct the maintenance staff to review all equipment critical to operations and safety-related items. Bringing equipment back from a long shutdown will likely present challenges not found on a Monday morning restart. Stress that lockout/ tagout (LOTO) procedures must be followed.
- Check for the potential accumulations of solvents, dust, and leaks.
- Ensure a sufficient supply of N-95 respirators are stocked, if employees request them. Employees should sign Sec. 29 CFR 1910.134, Appendix D—click [here](#). Keep respirators under supervisory control.
- If latex gloves are provided, remind employees about latex allergies.
- Ensure employees are not wearing half mask respirators without proper training, i.e., questionnaire, fit testing and clean shaving, etc.

Employee Communications

- Conduct ongoing plant-wide meetings as the workforce returns where senior management communicates reassurance, policies, procedures, etc. on what the organization has done and what employees should do. Managers can help by openly communicating with reassurance and honesty. Meetings with smaller groups of employees may be best.
- Conduct a daily stand-up meeting with updates on COVID-19, even if only to communicate that no employees have been affected. Assign a senior manager to facilitate these meetings; or, if not possible, qualified supervisors to communicate this information with their teams. As with all meetings, social distancing protocols should be maintained.

ORMARKS is proud of our commitment to protecting the health and safety of our employees and clients. We are here to support you. If you have any questions or require additional information, please contact ORMARKS Risk Control at polycyservices@ormarks.com.

Resources

CDC General Guidance for Businesses and Employers*
OSHA Guidance for General Coronavirus Control and Prevention Measures*
CDC Guidance for the Use and Removal of Contaminated PPE*
CDC General Guidance and Information About Nationwide Coronavirus Data*
OSHA 3990 Guidance on Preparing Workplace for COVID-19
OSHA's Respiratory Protection standard, 29 CFR 1910.134 /Appendix D
PMA Technical Bulletin: "Stretching Program – Shoulder and Neck Exercises"
PMA Technical Bulletin: "Stretching Program – Hand Exercises"
PMA and Safety Source Videos on PMA Websource