Prioritizing safety in the workplace

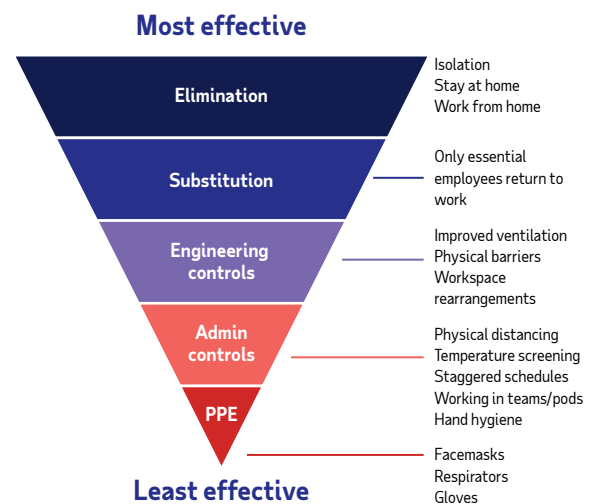## What to consider when welcoming your team back to work

The coronavirus (COVID-19) has caused many employers to shift work arrangements, whether through remote work, furlough or other measures. As state and local governments adjust regulations, you are likely making plans to adjust operations as quickly and safely as possible.

As you consider your return to work plan, there are a variety of health, safety and employment regulatory considerations, and many of these issues vary by industry and location. Right now it is critical for businesses to make informed decisions about the safety and wellbeing of their employees and customers. This checklist provides you with a glimpse of into how ADP helps thousands of businesses navigate COVID everyday. Use this checklist as a starting point. When you need personalized guidance for your workplace and employees, ADP's HR Outsourcing offerings can help support you with full-service HR, payroll, benefits, compliance and safety.

HIERARCHY OF CONTROLS FOR COVID-19

Can a mask protect me? Is physical distancing better? What's the best way to protect employees?

The hierarchy of risk controls is a framework used in occupational health to protect workers with the most effective controls. Following this hierarchy normally leads to the implementation of inherently safer systems.

Most effective

Elimination	Isolation / Stay at home / Work from home
Substitution	Only essential employees return to work
Engineering controls	Improved ventilation / Physical barriers / Workspace rearrangements
Admin controls	Physical distancing / Temperature screening / Staggered schedules / Working in teams/pods / Hand hygiene
PPE	Facemasks / Respirators / Gloves

Least effective

(Adapted from NIOSH)

ADP®
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Safely bringing employees back to work

Workplace safety/OSHA compliance

GOVERNMENTAL GUIDANCE/MANDATES

Check federal and state OSHA guidance and update policies and procedures (if applicable).

- Resource: Federal OSHA COVID-19 website
- Resource: White House Guidelines
- Resource: State OSHA plans

Determine whether any state and local mandates will limit the reopening of your facilities.

- Resource: State Governor's websites
- Resource: State Health Department websites
- Resource: National Association of County and City Health Officials

Check to see if relevant state and local governments have issued any mandates regarding social distancing, sanitation and mask use.

- Resource: State Governor's websites
- Resource: State Health Department websites
- Resource: National Association of County and City Health Officials

WORKER SAFETY

Infectious disease preparedness and response plan: Develop and implement an Infectious Disease Preparedness and Response Plan to help guide your company's protective actions against COVID-19. The plan should consider and address your employee's risks to exposure to COVID-19. Contact your Risk & Safety Specialist for further assistance.

Creative scheduling: Utilize telecommuting, staggered scheduling and group scheduling to minimize the impact of a COVID-19 exposure on your workforce.

- Resource: CDC Interim Guidance for Businesses and Employers

Physical distancing: Implement changes to the physical workplace to reduce risk of exposure to COVID-19 and comply with applicable social distancing mandates, such as moving workstations, altering layouts and access points, and installation of barriers.

- Resource: CDC Interim Guidance for Businesses and Employers

Cloth facemasks: Evaluate mandatory or voluntary use of facemasks. Train employees how to properly put on (don) and take off (doff) facemasks.

- Resource: CDC Recommendation Regarding the Use of Cloth Face Coverings
- Resource: CDC How to Safely Wear and Take Off a Cloth Face Covering

Personal protective equipment: Evaluate mandatory or voluntary use of PPE (masks, respirators, gloves, face shields, etc.).

- Resource: CDC General Business FAQ
- Resource: OSHA How to Correctly Wear a Respirator

Healthy hygiene practices: Train and ensure employees exercise proper and frequent handwashing (or hand sanitizer use) and use respiratory etiquette (including covering coughs/sneezes).

- Resource: CDC General Business FAQ
- Resource: CDC Handwashing Guide
- Resource: OSHA Infection Control and Prevention

Safety training: Develop and implement employee safety training on your COVID-19 response protocols.

- Resource: OSHA Infection Control and Prevention (Worker Training)
- Resource: NIEHS Worker COVID-19 Safety Training

WORKSITE PRECAUTIONS

Infection control: Implement infection control protocols, consistent with CDC and OSHA guidance.

- Resource: OSHA Infection Control and Prevention
- Resource: CDC Decision Tool
- Resource: CDC Preventing the Spread of COVID-19 in a Variety of Settings Throughout Your Community

Cleaning/disinfecting: Implement cleaning and disinfection protocols, consistent with CDC and OSHA guidance.

- Resource: CDC Cleaning and Disinfecting Your Facility

Ventilation: Evaluate HVAC system prior to re-occupancy after prolonged shutdown. Increase ventilation and air exchange in the building after exposure.

- Resource: EPA HVAC Guidance for Building and Maintenance Professionals

Signage and notices: Post federal, state and local required notices (e.g. FFCRA poster if less than 500 employees), and appropriate signage (e.g. hygiene/handwashing reminders, social distancing reminders, screening or temperature check points, visitor and customer reminders).

- Resource: U.S. Department of Labor Workplace Posters
- Resource: CDC COVID-19 Print Resources
- Resource: OSHA 10 Steps All Workplaces Can Take to Reduce Risk of Exposure to Coronavirus

WORKPLACE PROCEDURES

Communication: Communicate with your employees the steps taken to ensure their safety.

Encourage sick employees to stay home: Remind and encourage employees that they should not report to work when sick.

- Resource: CDC Decision Tool
- Resource: CDC Interim Guidance for Businesses and Employers

What to do if employee test positive: Develop protocols for addressing and isolating employees with reported COVID-19 symptoms or diagnosis (including provision of adequate notice to other employees but maintaining confidentiality over employee medical information).

- Resources: CDC General Business FAQ

Returning previously-ill employees: Develop and implement protocols to return employees to work after home isolation due to COVID-19. Identify a designated person (i.e., Safety Manager) to ensure compliance with Return to Work policy and guidelines.

- Resource: State Governor's websites
- Resources: CDC General Business FAQ
- Resource: Federal OSHA COVID-19 website

Visitors/contractors: Impose appropriate limits on visitors/contractors to your facilities. Establish visitor, contractor and customer safety policies and procedures. Post signage on the front door letting customers know about changes to your policies and instruct them to stay away if they are experiencing COVID-19-like symptoms.

- Resource: CDC Interim Guidance for Businesses and Employers

Meetings: Impose appropriate limits on size of in-person meetings and proximity of seating.

- Resource: CDC Interim Guidance for Businesses and Employers

OSHA recordkeeping: Ensure COVID-19 cases are recorded per OSHA guidance.

- Resource: Federal OSHA COVID-19 website

COVID-19 medical recordkeeping: Follow guidance from the Equal Employment Opportunity Commission regarding confidentiality of medical records from health checks.

- Resource: EEOC What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws

EMPLOYEE HEALTH SCREENINGS

Screening program: Decide whether to implement an employee / visitor screening program to check for fever and COVID-19 symptoms. Check your state and local authorities for mandates or recommendations; address compensability of any time spent on screening employees.

- Resource: CDC General Business FAQ
- Resource: CDC Interim Guidance for Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19
- Resource: EEOC What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws

Screening program planning: Plan out for your employee screening program. Recommendations for careful planning: Identify a program leader, understand applicable mandates and recommendations, determine who is subject to screening, establish safe procedures, plan for persons that refuse the screening, determine data collection and security, provide training for program administrators including required safety precautions, and communicate to employees about what to expect.

- Resource: CDC Reopening Guidance
- Resource: CDC Critical Workers Safety Practices
- Resource: CDC General Business FAQ

COVID-19 testing: Ensure any mandatory medical test of employees be "job related and consistent with business necessity." Ensure that the tests are accurate and reliable. CDC guidance for COVID-19 may be adapted by state and local health departments to respond to rapidly changing local circumstances. Contact your local or state health department for local requirements.

- Resource: EEOC What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws
- Resource: National Association of County and City Health Officials

Temperature checks: Refer to CDC and EEOC guidance for requiring temperature checks as part of a screening program. Protect employees performing temperature checks as part of a screening process.

- Resource: CDC General Business Frequently Asked Questions
- Resource: EEOC What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws

Employee self-certification: Train employees on how to screen themselves for symptoms. Use the CDC Symptom Self-Checker. Review state and local employer screening requirements as some states require employee screenings.

- Resource: CDC Symptoms of Coronavirus
- Resource: CDC Symptom Self-Checker

Contact tracing: Consult applicable state and local law for any variations of CDC or EEOC guidance before designing and implementing a contact tracing program. Use of contact-tracing apps must not be conducted in a discriminatory manner based on an individual's protected characteristics. Be ready to consult with local health authorities if there are cases in the facility or an increase in cases in the local area.

- Resource: CDC Workplace Decision Tool
- Resource: CDC Contact Tracing Resources

INDUSTRY-SPECIFIC GUIDANCE

Utilize industry-specific guidance from OSHA, CDC and/or AIHA.

- Resource: CDC Communities, Schools, Workplaces, and Events
- Resource: Federal OSHA COVID-19 website
- Resource: AIHA Back to Work Safely

EMPLOYEE RELATIONS

Ensure that all return-to-work decision-making processes and employee communications are properly documented.

Notify employees regarding their return to work. Return-to-work letters will typically provide information regarding their return date and schedule, as well as information regarding any changes or updates regarding pay, benefits, PTO, new policies and procedures, and an at-will employment disclaimer. Any changes to pay or hours of work may be subject to advance notice requirements under state law.

- Resources: CDC Guidelines Opening Up America Again
- **Note:** If you have borrowed a loan under the CARES Act PPP program and an employee declines a rehire offer, you will need to ensure that a good faith, written offer of rehire has been made and maintain documentation of the employee's rejection of that offer for eligibility of loan forgiveness

Create a clear communications plan with employees around the company's plans to reopen.

Topics to communicate with associates may include:
- Wage payment notices and onboarding paperwork will be required for all employees who have been rehired
- Potential drug testing requirements for rehires (could be subject to state restrictions)
- Potential background checks for rehires (could be subject to federal or state restrictions)
- Communicate how staying home if sick and physical distancing policies are being used to protect workers and customers
- Detail what training on new workplace safety and disinfection protocols have been implemented
- Have exposure-response communications ready to go to any affected employees and customers

Train employees on new policies, protocols and rules.

Consider updating job descriptions to address changes in job duties and essential job functions.

Engage in a dialogue and provide reasonable accommodations to employees who may be more vulnerable to COVID-19 because of underlying health conditions.

- Resource: Pandemic Preparedness in the Workplace and the Americans with Disabilities Act, Job Accommodation Network

Assess whether leave and other accommodations may be required by the Americans with Disabilities Act, Family and Medical Leave Act, Families First Coronavirus Relief Act, and under state law.

- Resource: Manage Leaves of Absences and Legislative Updates

Contact us today to learn more about how ADP's HR Outsourcing solutions help businesses solve for today's workplace safety challenges.

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