



## Worksite Reopening During Coronavirus Checklist

### Decide to Reopen

- ✓ Determine if you are permitted to reopen under state and local law.

See <https://covid19.nlc.org/resources/covid-19-local-action-tracker/>

- ✓ Check for state coronavirus-related employment laws that may apply to your business.
- ✓ Here is the State of Connecticut Self-certify re-open site:

<https://portal.ct.gov/DECD/Content/Coronavirus-Business-Recovery/Sector-Rules-and-Certification-for-Reopen>

### Determine if reopening is best for your business.

- ✓ Complete a risk assessment to determine if you can reopen safely.
- ✓ Consider any factors that could make it difficult for employees to return to work, such as transportation issues or lack of childcare. Note that employees who rely on public transit, carpooling, or other ridesharing may have difficulty traveling to the workplace.
- ✓ Consider the cost and risk of reopening.
- ✓ Assess your business's ability to operate remotely.

### Prepare the Workplace for Reopening

- ✓ Designate an employee or taskforce to oversee the reopening process.
- ✓ Review federal and state agency guidance for reopening.

- ✓ Centers for Disease Control and Prevention: Interim Guidance for Businesses and Employers:

<https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-re-sponse.html> and to download Resuming Business TOOL KIT.

### Assess any structural or design changes that must be made to your workplace.

- ✓ Rearrange employee seating to allow for social/physical distancing protocols.
- ✓ Add partitions or barriers when needed.
- ✓ Designate single-direction hallways whenever possible.
- ✓ Consider elevator safety and design crowd control plans.
- ✓ Assess risks associated with common areas and close areas or remove seating as necessary.
- ✓ Determine if doors, sinks, and toilets can be converted to touchless systems.

### Employment, Checklist - Worksite Reopening During Coronavirus

- ✓ Remove coffeemakers, toasters, microwaves, and other communal food equipment.
- ✓ Provide touchless waste bins or remove lids.
- ✓ Provide for proper personal protective equipment (PPE) disposal.



- ✓ Assess your HVAC system and update it if necessary.
- ✓ Arrange for regular cleaning and disinfection of your workplace. Hire additional cleaning staff if necessary.
- ✓ Assess hand sanitizer, soap, and cleaning product needs and availability.
- ✓ Review OSHA guidelines on PPE, surgical masks, and face coverings and determine what is necessary and available.

**Review Policies and Procedures**

- ✓ Set a timeline for reopening and communicate it to employees.
- ✓ Develop a written protocol for suspected or confirmed Covid-19 infections.

For example:

“Employees are prohibited from coming to work if:

- they test positive for Covid-19 and are currently experiencing symptoms or have experienced symptoms within the past seven days;
- they currently have any of symptoms of Covid-19;
- within the past 14 days, they or anyone in their household has been in close contact with any person who has a Covid-19 infection or symptoms of a Covid-19 infection; or
- they have any reason to believe that they have or are at risk of having a Covid-19 infection.

Employees are permitted to work when they recover from Covid-19 if they have approval from a medical professional and have not experienced and symptoms for seven days.

Employees will be notified if they are exposed to Covid-19 at work. Employees are not entitled to know the identities of infected employees.

If exposure occurs, all or part of the worksite will be temporarily closed to allow for cleaning and disinfection.”

“For purposes of this policy, symptoms of Covid-19 are defined by the Centers for Disease Control and Prevention and available on the CDC website. They include:

- Fever (100.4F (38C) or higher) or chills
- Cough
- Shortness of breath or difficulty breathing
- Fatigue
- Muscle or body aches
- Headache
- New loss of taste or smell
- Sore throat
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea

The symptoms listed below are considered more serious and employees who experience them should seek immediate medical attention:

- Trouble breathing
- Persistent pain or pressure in the chest
- New confusion
- Inability to wake or stay awake
- Bluish lips or face”

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“Reporting and Confidentiality

Any employee who is prohibited from reporting to work under this policy must notify their immediate manager or [or other designated person].

The Company will make every effort to maintain confidentiality, however, employers may be required



to report infections to federal, state, or local government agencies.

The Company will inform other employees if they have been exposed to the virus but will not reveal the identity of the infected employee.

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“Employees who are prohibited from reporting to work under this policy are entitled to the following leave:

[describe leave available].”

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- ✓ Update travel policies to eliminate business travel.
- ✓ Update leave policies to include any additional leave that employees may be entitled to.
- ✓ Update telework and computer policies to clarify eligibility upon return to worksite.
- ✓ Review and update visitor policies to limit when guests are allowed on company premises.
- ✓ Consider implementing temperature checks or health screenings.
- ✓ Address confidentiality, wage and hour, and safety issues associated with temperature checks.

**Temperature Checks and Health Screening.**

- ✓ Consider adjusting or staggering employee schedules to reduce the number of individuals on site and better allow for social distancing.

- ✓ Consider where and when employees will be permitted to eat lunch.
- ✓ Consider how to handle employees who are at higher risk for complications from a Covid-19 infection.
- ✓ Plan and prepare for disability and religious accommodation requests and political objections.
- ✓ Create and implement social distancing, hand washing, cloth face covering, and PPE policies.

**Employment, Checklist - Worksite Reopening During Coronavirus**

- ✓ Post signs to remind employees of policies and encourage compliance.

**Prepare Employees to Return to Worksite**

- ✓ Communicate plans, policies, and timelines to employees.
- ✓ Provide training on any new policies and the use of PPE and/or cloth face coverings.
- ✓ Provide a method for employees to ask questions and raise concerns.
- ✓ Consider employee morale—request feedback and address concerns promptly.
- ✓ Notify employees of benefits or resources that are available to them.
- ✓ Address misinformation directly.
- ✓ Train managers on how to implement and enforce safety procedures.



- ✓ Train managers on how to avoid retaliation.

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### **The Americans With Disabilities Act**

The Americans with Disabilities Act requires employers to keep employees' health information confidential, regardless of the pandemic. Employers should be careful to maintain employee privacy when addressing Covid-19 infections and maintain any records of employees' health information separately from their personnel files. *See EEOC's Pandemic Preparedness in the Workplace and the Americans With Disabilities Act*; 29 C.F.R. § 1630.14(c)(1).

### **Paid Sick Leave**

Family First Coronavirus Response Act (Effective 4/1, 2020 to 12/31/2020) provides for 80 hours of paid sick leave and covers private employers with less than 500 employees, public employers regardless of size with certain limitations and small businesses with less than 50 employees but there may be an available exemption. To be eligible, (1) the employee must be under a federal, state or local quarantine or isolation order; (2) advised by a health provider to self-quarantine; (3) experiencing symptoms and seeking a medical diagnosis; (4) caring for an individual who is subject to the reason in (1) or (2) (5) caring for their child if the school or place of care of the child has been closed, or the child care provider is unavailable; and (6) the employee has a substantially similar condition specified by the Secretary of Health and Human Services in consultation of the Treasury and the Secretary of Labor. For reasons (1) through (3), Sick leave is 100% of an employee's average regular rate of pay, up to \$511 per day or \$5,110 in the aggregate. For reasons (4) through (6), up to \$200 per day or \$2,000.00 in the aggregate.

This United States Department of Labor Page provides information about these acts and required

posters to be posted at: <https://www.dol.gov/agencies/whd/pandemic>. ([www.bloomberglaw.com](http://www.bloomberglaw.com))

### **Disclaimer**

The information provided herein does not constitute legal advice and is offered only for general informational purposes only.

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