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Safety Plan for Returning to Workplaces During the COVID-19 Pandemic

This overarching Safety Plan is intended to help organizations make effective process and facilities-use changes that reduce the risk of workplace transmission of COVID-19 and increase employee confidence in the safety of their workplace. Items addressed include: public health considerations, logistical considerations, and recommendations for implementing workplace controls.

Supervisors are encouraged to coordinate with
for preparation and interpretation of both health and facilities guidance facilities guidance. Where multiple organizations are co- located, coordination is encouraged. Inclusion of the facility manager in planning is also encouraged.

Workforce protection and safety are critical to reopening, and measures must be taken to ensure that employees:
  a) have appropriate policies, guidance, supplies, and training to safely return to work;
  b) understand their responsibility/role; and
  c) prepare a unique Workplace-specific Safety Plan Addendum for each location (i.e. review and either accept or revise Safety Plan Addendum template for each location of this organization).
Actions taken by individuals can prevent and slow the spread of COVID-19 within the workplace.

In addition to familiarizing employees with the contents of this Safety Plan by requiring training, all workplaces used by this organization will prepare and implement a Workplace-specific Safety Plan Addendum. Implementation of this tandem set provide a structure for:
  • confirming evaluation of a summary of current cleaning practices for each workplace;
  • evaluating hazards for all areas and job tasks with potential exposure to COVID-19; and
  • identifying control measures to eliminate or reduce such hazards.

As activities at workplaces restart, please keep safety in mind and contact
with questions or concerns related to risk assessment and management strategies.

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Considerations Before Returning to Work

Public health considerations during the COVID-19 pandemic
COVID-19 is a respiratory disease caused by a new virus (i.e. SARS-CoV-2). It is thought to spread primarily through respiratory droplets produced when an infected person coughs or sneezes. Other possible means of transmission include aerosols (e.g., an infected person breathing) and transfer of virus through touching the mouth, nose, or eyes after touching a contaminated surface. Symptoms may appear 2-14 days after exposure, and some infected individuals never exhibit symptoms. Infected individuals may transmit the disease even if pre-symptomatic or asymptomatic. To prevent spread of COVID-19 as employees return, each work unit (e.g. campus administrative unit, county/tribe location, institute location, etc.) should:

- Commit to physical distancing. A distance of six feet or more (roughly two arm lengths) between individuals should be maintained at all times.
- Implement good hygiene and infection control practices, including:

    o   Read the Policy related to returning to workplaces during COVID-19.

    o   Have all employees that will be working on-site complete the required online training; it includes basic information about COVID-19 and best practices for reducing risk of exposure:

    o   Develop a plan for reduced occupancy and physical distancing. The density of people in any building space at one time is limited to 25% capacity or less. A distance of six feet or more (roughly two arm lengths) between individuals should be maintained at all times.

    o   Promote frequent and thorough handwashing. If soap and running water are not immediately available, provide alcohol-based hand sanitizers containing at least 60% ethanol or 70% isopropanol.

    o   Encourage workers to stay home if they are sick.

    o   Encourage respiratory etiquette, including covering coughs and sneezes. If no tissues are available, individuals should cough or sneeze into their elbow.

    o   Discourage employees from using other employees' phones, computers, desks, offices, or other work tools and equipment, when possible.

    o   Cleaning and disinfecting are ongoing requirements. All employees must be engaged in the constant maintenance of their workspace.

- Adhere to state and local guidance for use of face coverings. Read the following guidance for the use of cloth face coverings. Note: Gloves are not recommended as a measure to protect against COVID-19.
- Conduct periodic "confidence cleaning" (i.e. not custodian-provided cleaning) to disinfect high touch objects, equipment, and areas frequently (at a minimum, between shifts; e.g. use disinfectant wipes before and after use of a table in a common area).
- Adhere to guidance for logging employees and others who occupy each location, and all participants in every programming event.

Logistical considerations for start-up planning
The COVID-19 pandemic has caused considerable disruption of operations and supply chains. Considerations include:

- **Much is still unknown about COVID-19. Be prepared to reduce or cease operations again in case a resurgence leads to a change in approval of activities and/or re-closing of facilities.**

- Ensure you have adequate face coverings, hand sanitizer, and cleaning products to support activities. Assess your existing supplies and use rate. Consider implementing measures to extend stocks, such as modifying workflows to reduce need. Supervisors will need to establish process for procuring often limited face covering, hygiene and cleaning products.

Start-up Planning

General Building Considerations

- Supervisors will be responsible for coordinating with the facility director of each workplace to facilitate development of appropriate operational practices. Working together, undertake the following:
  - Walk through the workplace building, verifying that corridor fire extinguishers, pull stations and emergency egress are not obstructed.
  - Evaluate practices for mail and package delivery services. Alternative arrangements may be required to support approved activities.
  - Assess how best to accommodate access for employees approved to return to workplaces.

Step 1: Review the "[Infectious Disease Preparedness and Response Plan]".

The following intentional steps allow readiness with planned actions in the event someone begins to exhibit symptoms of illness at work or reports a positive COVID-19 test.

In the event that someone is recognized as being COVID-19 symptomatic at a workplace, in most cases, you do not need to shut down your entire facility.

- If it has been less than 7 days since the sick employee has been in the facility, close off any areas used for prolonged periods of time by the sick person. Work with contact person who directs custodians to have CDC guidance for cleaning followed.
- If it has been 7 days or more since the sick employee used the facility, additional cleaning and disinfection is not necessary. Continue with routine custodial cleaning and disinfecting of all high-touch surfaces in the facility.
- [Deep cleaning] will be managed by custodians or a contracted service provider.

Step 2: Accept or Revise the Workplace-specific Safety Plan Addendum

Supervisors will prepare a Workplace-specific Safety Plan Addendum for each workplace or location. Since not all operations and facilities have the same hazards, Supervisors will modify the Addendum to accommodate conditions and operational practices for each workplace. In reviewing facilities, focus on the relationship between the employee, the task, the tools, and the work environment. After identifying uncontrolled hazards, take steps to eliminate or reduce them to an acceptable risk level.

- Action item 1: Collect existing information about workplace cleaning processes and approved activities.
- Action item 2: Identify potential opportunities for health hazards. For example:
  - Identify frequently touched areas (doors, cabinets, etc.)
  - Identify locations of high traffic or congestion with special consideration to how employees and others will enter and exit a given space
  - Identify customer service/transaction areas
    NOTE: Simply applying percentage reductions to normal occupancy (for example 25%) of a space or even basic per person area reductions will not realistically inform physical distancing capability. Every space is different. Evaluating each space with consideration to the specific tasks to be performed is the ideal method for identification of hazards and options for specific mitigation strategies.
- Action item 3: Characterize the nature of identified hazards and prioritize the hazards for control based on the likelihood and severity.

Implementing Workplace Controls

Once the Workplace-specific Safety Plan Addendum for a location is complete, appropriate workplace controls should be identified and put in place. Given the initial very low-level of activities likely approved at workplaces, mitigation of some hazards may be undertaken over time, but prior to denser and/or longer duration occupation of the workplace.

The framework known as "Hierarchy of controls" is used to select ways of controlling workplace hazards. The best way to control a hazard is to systematically remove it from the workplace, rather than relying on employees to reduce their exposure. For example, the best way to protect employees from COVID-19 transmission is to eliminate the need for their presence in the workplace. Consideration should be given to whether changes in requirements or processes could reduce the need for on-site staffing. Employees that are able to perform their work remotely (e.g., telecommuting) are still encouraged to do so.

During a COVID-19 outbreak, when it may not be possible to eliminate the hazard inherent in being present in the workplace, the protection measures are listed from most to least effective: engineering controls, administrative controls and use of face coverings.

There are advantages and disadvantages to each type of control measure when considering the ease of implementation, effectiveness, and cost. In most cases, a combination of control measures will be necessary to protect employees from exposure to COVID-19. In addition to the types of workplace controls discussed below, CDC guidance provides recommended COVID-19 infection prevention strategies to implement in workplaces.

Engineering Controls
Engineering controls involve isolating employees from work-related hazards. In workplaces where they are appropriate, these types of controls reduce exposure to hazards without relying on employee behavior and can be the most cost-effective solution to implement. Engineering controls to protect against COVID-19 include:
- Reconfigure common areas to limit occupancy. Remove chairs and desks (or make them unusable) to ensure proper physical distancing (e.g., in break, conference and waiting rooms). Reduce furniture items that require cleaning or cannot be easily cleaned.
- Eliminate reusable kitchen items (e.g., flatware, dishes, and cups) and cleaning tools (e.g., sponges, brushes, towels) and replace with single use options.
- Remove shared appliances (e.g., coffee makers, ice/water dispensers). Shared refrigerators and microwaves may remain. Cleaning supplies should be provided to allow employees to clean surfaces and handles before and after use.
- Remove high-touch items such as magazines, common pens, etc.
- Consider spacing out shared equipment in areas prone to congested circulation.
- Consider installing plexiglass barriers at high-interaction areas where other strategies for physical distancing may be difficult to maintain such as reception desks and check-in points. Many portable/free-standing options are available commercially. Permanent mounting should be carefully considered and must involve coordination with facilities managers. Barriers should be employed carefully and used only when face-to-face contact or transaction is unavoidable.

Administrative Controls
Typically, administrative controls are changes in work policies, procedures, and practices to reduce or minimize exposure to a hazard.

Work procedures that protect against COVID-19 include:
- Minimize contact among employees, partners, and participants by replacing in-person meetings with virtual communications and implementing telework wherever feasible.

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- Establish alternating days or extra shifts that reduce the total number of employees in a facility at a given time, allowing them to maintain distance from one another while maintaining a full on-site work week.
- Discontinue nonessential travel to locations with ongoing COVID-19 outbreaks. Regularly check CDC travelwarning levels.
- Develop emergency communications plans (in most cases the Supervisor will serve as the initial point of contact).
- Provide employees with up-to-date education and training on COVID-19 risk factors and protective behaviors (e.g., cough etiquette, use of face coverings).
- Train employees who need to use protective clothing and equipment how to put it on, use/wear it, and take it off correctly, including in the context of their current and potential duties. Training material should be easy to understand and available in the appropriate language and literacy level for all employees.
- Place appropriate signage at entrances indicating how to proceed, who to contact, and the preferred use of the space.
- Identify allowable occupancy in order to control workflow; establish and post maximum occupancy in common break areas.
- Institute occupancy limits for elevators via signs and floor marking [this has accessibility/code concerns and needs to be carefully reviewed by the facility manager prior toimplementation]
- Where possible, designate separate entry and exit doors for spaces with more than one door to avoid passing others in thedoorway.
- Procure and monitor inventories of hand sanitizer, wipes, cleaning products, and hand soap.

Safe work practices are types of administrative controls that include procedures for safe and proper work used to reduce the duration, frequency, or intensity of exposure to a hazard. Examples of safe work practices to protect against COVID-19 include:
- Provide resources and a work environment that promotes personal hygiene. For example, provide tissues, hand soap, alcohol-based hand sanitizers containing at least 60% ethanol or 70% isopropanol, disinfectants, and disposable towels for employees to clean their work surfaces.
- Require regular hand washing or use of alcohol-based hand sanitizers. Employees should always wash their hands when they are visibly soiled, after using the restroom, and after removing any PPE.
- Post handwashing signs in restrooms and near sinks.
- Perform routine "confidence cleaning" by routinely cleaning and disinfecting all frequently touched surfaces, such as workstations, countertops, handrails, and doorknobs. Follow the manufacturer's instructions for use of all cleaning and disinfection products (e.g., concentration, application method and contact time, PPE).
- Discourage sharing of tools and equipmentwhereverfeasible.
- Conduct meetings electronically, even when working on campus. If meetings cannot be conducted virtually, keep participation to fewer than 10 participants and enforce appropriate physical distancing. Adhere to guidance for use of face coverings.
- Use visual cues as a helpful reminder of appropriate physical distancing.
- Avoid concurrent use of bench tops/desks/workspaces that face one another.
- Use collaborative software or another system to maintain a schedule for staggered sign-up and use of equipment and spaces.
- Coordinate with other work units and building occupants to develop a schedule for staggered use of common spaces such as break rooms and lounge areas.
- Encourage single occupancy in work rooms when hazardous materials or hazardous work procedures are not in use.

Communications between Supervisors and employees, with partners, and others are an important part of effective administrative controls. Examples of communications that can help protect against COVID-19 include:

- Actively encourage sick employees to stay home. Make it clear that they can do so without fear of reprisals.
- Promote etiquette for coughing, sneezing, and handwashing.
- Supervisors should remain open to conversations with employees about their concerns. Some employees may be at higher risk for severe illness, such as older adults and those with chronic medical conditions.
- Make sure to include all employees in hazard communication about the risk of spreading COVID- 19 in the workplace. Do not make assumptions and be mindful that employees are not required to disclose medical conditions or their immune status.
- Provide important information in the appropriate language and literacy level for all employees, like fact sheets and posters.

Face Coverings

While engineering and administrative controls are considered more effective in minimizing exposure to COVID-19, face coverings also reduce risk of exposures. While correctly using face coverings can help reduce some exposures, it should not take the place of other prevention strategies.

- Use face coverings per state and local guidance and training;
- Procure and monitor inventories of face coverings for use by employees and others as needed.

Not Recommended

Some control measures are not advisable due to efficacy, cost, regulatory requirements, or unintended harmful consequences. The following are not recommended:

- Installation of no-touch soap dispensers.
- One-way corridors and stairwells. This strategy is useful in very limited situations and application due to potential impacts related to safety (e.g. compliance with fire code) and accessibility.
- Propping open restroom doors; these doors are design to be closed for fire safety and ventilation purposes. Propping them open may negatively impact the balance of air handling systems and reduce the health benefits that were intended in other areas of the facility.

First Day Back

Food and Shared Appliances

Be sure to check the condition of refrigerators and set parameters for use. Evaluate the expiration dates of food. Date labels on food products are not always indicative of food spoilage, so "when in doubt throw it out." Remove shared appliance such as coffee makers. Set strict parameters for use of microwaves and refrigerators.

Drinking Fountains and Sinks

Water stagnation during extended breaks can result in changes to color, taste, odors, and turbidity. Usually these are resolved when normal water flow returns to the building. It is a good idea to let water run for a minute from drinking fountains, bottle fillers, or sink taps before using it for consumption.

Using personal water bottles and obtaining water from refillable water bottle stations (hydration stations) is a good option; post signs to prohibit drinking water directly from fountain spigots.

Indoor Air Quality

Building ventilation during the closure was likely not interrupted. Work with the facility manager of each building to confirm status; set the expectation that each HVAC system will continue to be operated within its designed

capabilities to manage ventilation, vapor pressure, temperature, and relative humidity to limit the transmission of COVID-19. Supervisor should check in with the facility manager to confirm:

- careful management parameters are in place with respect to moisture, temperature targets and fluctuation, and condensation;
- routine checking for mold growth has been conducted;
- contact information is available if significant indoor air quality issues occur.

Office Walkthrough and Re-start Preparations

For buildings that have been fully closed for an extended period, contact the facility manager and seek input for reopening. For buildings that have remained in light operation:

- Walk through all areas and rooms to identify potential hazards and anticipate needs for employees and others when active. Pay particular attention to entrances, common spaces, and circulation paths to ensure physical distancing can be maintained.
- Contact the facility manager to request a summary of current custodial practices; also request an overview of steps are being taken to optimize HVAC operations and reduce exposure to COVID-19.
- Maintain physical distancing and adhere to guidelines for use of face covering during walkthrough and start-up.
- Review and, if necessary, update all Occupant Emergency and Evacuation Plans.
- Check that nothing is obviously out of place, missing, damaged, leaking, etc.
- Ensure the availability of adequate hand sanitizer and cleaning products.
- Verify all emergency equipment is functional and accessible (e.g. fire extinguishers, etc.)
- Flush all faucets. Care should be taken to minimize splashing and aerosol generation during flushing. Discolored water may be common. If observed, this can be resolved by:
  - Running the cold water tap until the water runs clear.
  - If water does not clear after 5-10 minutes, contact facility manager.