BLANKROME

COVID-19 Return-to-Work Checklist

May 2020

PLANNING TO REOPEN

☐ Determine when reopening is permitted by state and local law and when it is best for your company

☐ Develop timeline for reopening and consider possibility of phased return to work

☐ Coordinate with landlord or management company regarding specific building protocols

☐ Develop contingency plans in case offices must close due to COVID-19 exposure

☐ Identify essential and non-essential employees for in-office operations

☐ Determine when and whether to recall furloughed employees and develop recall plan

☐ Consider union/CBA obligations regarding return-to-work preference, scheduling, and other issues; engage union leadership where appropriate

RETURNING EMPLOYEES TO THE WORKPLACE

☐ Develop communication plan to notify employees of plans to reopen and company expectations

☐ Consider whether to encourage continued remote work by certain employees and develop/update policies to handle remote work requests

☐ Develop transportation plans to encourage safe commuting—parking subsidies, company-hired vans/busses, education on safe commute practices

☐ Consider implementing staggered schedules for employees—different arrival/departure times or rotating in-office and remote work schedules

WORKPLACE SAFETY

☐ Review CDC and OSHA standards and state/local public health orders to determine specific workplace safety requirements

☐ Develop employee health screening protocols—temperature checks, health questionnaires, and/or virus and antibody testing

☐ Develop cleaning protocols for shared/common areas, employee workstations, and offices

☐ Develop policies to promote employee hygiene—hand-washing breaks, increased availability of sanitizer and cleaning supplies

☐ Educate employees regarding best practices for hygiene—no handshakes, hand-washing frequency, face coverings, cough etiquette

☐ Where possible, implement social distancing by rearranging workstations, controlling access and spacing in common areas (reception, conference rooms, kitchens, restrooms), restricting or eliminating in-person meetings

☐ If employees use shared workspaces, consider minimizing shared equipment by providing disposable desk covers, individual computer equipment, etc.

☐ Consider marking one-way path of travel in hallways and other common areas

☐ Consider whether to require or recommend that employees wear masks, face coverings, gloves, or other protective attire (PPE where required)

☐ Develop policies for third-party access to premises—vendors, couriers, package deliveries, guests

☐ Develop policies regarding employee travel and potential isolation requirements following return from travel

☐ Designate employee points of contact for safety concerns—both company-wide and on each floor or in each work area

☐ Develop policies and processes for COVID-19 workplace safety complaints

LEAVE AND ACCOMMODATION POLICES

☐ Review and update employee leave policies to address FFCRA/state law requirements and to consider unique circumstances (childcare, etc.)

☐ Review updated DOL, EEOC, and state/local guidance regarding employee accommodation obligations specific to COVID-19 pandemic

☐ Consider flexibility and specific policies for COVID-19 leave or accommodation requests, including due to personal and family health concerns

☐ Clearly communicate policies and expectations to employees

OTHER CONSIDERATIONS

☐ Communicate regularly with employees regarding safety practices, responses to employee concerns, and updates on COVID-19 workplace matters

☐ Consider adjustments to hiring policies—require virus or antibody testing as a condition of job offer

RECOMMENDED POLICIES AND DOCUMENTS

☐ Workplace reopening communications—reopening letter, furlough recall letter, remote employee return letter

☐ Office hours and scheduling policies—telework, rotational work, staggered scheduling

☐ Updated employee leave policies—FFCRA and state COVID-19 leave, if applicable, and other adjustments to existing leave polices, with associated employee communications

☐ Safe workplace policy—temperature checks / health screening, COVID-19 testing [optional], social distancing, employee hygiene, third-party access, mail/delivery requirements, office cleaning and sanitizing, use of common spaces, PPE requirements, and other COVID-19 safety matters

☐ Internal checklist for safety modifications (examples: elevator policies, one-way hallways, common area seating, relocating workspaces/cubicles, hand sanitizer stations, six-foot distance markings, touchless modifications, restroom modifications)

☐ Procedures for confirmed/suspected workplace exposure to COVID-19

☐ Procedures for COVID-19 accommodation requests

☐ Procedures for raising and handling COVID-19 complaints (safety, accommodations, etc.)

☐ COVID-19 updates to hiring policies and new hire communications

☐ COVID-19 updates to existing EEO, Anti-discrimination, Retaliation, ADA, and OSHA policies.

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