Health and Safety Toolkit

Use this toolkit to help keep your workplace safe, manage the health of your employees, and appropriately respond to a COVID-19 diagnosis.

aps®

Your Workforce Partner

1 Making the Workplace Safe

Personal Hygiene—Masks

Provide employees with masks and require that they wear them at all times. A clearly written and consistently enforced policy is best. Here is a **sample**.

You can also require customers to wear masks and have extras available for their use, but do not make employees responsible for enforcing your masking rules. Handling customers who refuse to wear a mask should be the responsibility of management.

Personal Hygiene—Handwashing

Have employees wash their hands as soon as they come in the door, any time they blow their nose, touch garbage, make food, exit and reenter the building, and before and after breaks. You may also want to schedule regular, staggered handwashing throughout the day, but avoid having all employees wash their hands at the same time, as this will cause a crowd around the sinks. Consider a schedule of having employees wash based on first or last initial, e.g., A-F on the hour, G-L at 15 after, etc.

Provide hand sanitizer if frequent handwashing is impractical or impossible, and also in locations where employees cannot avoid high-touch surfaces, such as near commonly used doors, buttons, or keypads.

"A clearly written and consistently enforced policy is best."

Surface Hygiene—Cleaning

Assign scheduled cleaning of frequently touched surfaces to specific employees. They should pay special attention to doorknobs, light switches, countertops, handles, phones, keyboards, toilets, faucets, keypads, communal pens and markers, and dispensers. You can also mark high-touch surfaces to bring attention to them.

Don't mix cleaners. The effects can be toxic!

Surface Hygiene—Reducing Touch Points

Aside from frequently cleaning high-touch surfaces, you can reduce the number of surfaces people have to touch. Consider doorstops for rooms that don't need the door closed (but be mindful of the fire code); motion-activated, button, or foot-pull door openers; motion-activated or open-top garbage cans; motion-activated water faucets and bottle filling stations; and key fobs instead of pin pads.

> "Don't mix cleaners. The effects can be toxic!"

Building Ventilation

Here are actions you can take to improve air quality:

1. Install HEPA filters to improve central air filtration.

2. Increase the percentage of outdoor air, assuming outside air is safe.

3. Consider using natural ventilation such as open doors and windows.

4. Increase total airflow supply to occupied spaces, if possible, and consider running the building ventilation system even during unoccupied times.

5. Disable demand-control ventilation (DCV) controls that reduce air supply based on temperature or occupancy.

6. Generate clean-to-less-clean air movement. Have staff work in areas served by "clean" ventilation zones that do not include higher-risk areas.

Modifications for Office Spaces

If you're unable to have your workforce work from home, consider these social distancing practices:

1. Allow individual people to work from home, whether part time or full time.

2. Stagger shifts if there is production work that allows for it.

3. Change seating arrangements—send people to empty desks and conference rooms, break rooms, unused offices, lobbies, courtyards, etc.

4. If you can't spread people out well enough, install barriers in open work areas with plexiglass and, if possible, make sure employees are not facing one another.

5. Conduct meetings over the internet so employees aren't packed into a room. If you *must* have an in-person meeting, hold it in a large, well-ventilated area, set up chairs ahead of time at least six feet apart, ensure that there are obvious, wide pathways so people don't have to dance to get in and out, and record or simulcast the meeting so those who cannot attend in person still get the benefits (and avoid adverse action under the ADA).

"...if possible, make sure employees are not facing one another."

Personal Travel

You may restrict high-risk travel and ask employees to report all out-of-state travel to HR before traveling or at least before returning to the workplace. This includes travel that does not require the use of time off, such as taking a weekend trip. You may also require quarantine periods post-travel, depending on current government guidelines or company policy.

Acknowledgement of Policies

Require that employees read and sign an acknowledgement of your policies related to COVID-19. A sample can be found here.

"You may also require quarantine periods post-travel, depending on current government guidelines or company policy."

2 Managing Individual Health

"A pandemic is a different story, and employers have a little more leeway to manage individual health."

Under normal circumstances, employers would not ask employees about their health or conduct medical examinations like taking temperatures in the workplace. A pandemic is a different story, and employers have a little more leeway to manage individual health.

Assessing Symptoms

Before employees come into the workplace, they should self-assess for any symptoms related to COVID-19. These include fever (100.4+) or chills, cough, shortness of breath, difficulty breathing, fatigue, headache, congestion, runny nose, sore throat, muscle or body aches, nausea, vomiting, diarrhea, and new loss of taste or smell. If you ask employees any questions about their health or any symptoms, keep those questions specific to COVID-19.

If you take temperatures, be sure to require masks for both parties, provide goggles or face shield for the screener, provide a physical barrier between screener and employees, require 6' of distance until the screener must get closer, provide new gloves and require hand washing or sanitizing between each employee if the screener has to make physical contact with employees, sanitize thermometer between uses if it contacts employees, and keep the results confidential. Remember, however, that not everyone with COVID-19 has a fever. Note as well that temperature checks, whether at home or in the workplace, should be done 30 minutes after any exercise and 4 hours after any fever reducers are taken.

Managing Risk

The Centers for Disease Control and Prevention (CDC) has advised employers that employees who appear to have symptoms of COVID-19 should be separated from other employees and sent home immediately. If the employee feels well enough to work, consider whether they can effectively telecommute. You should not, however, send employees home because you believe they are higher risk—this includes pregnant employees. We would encourage you to make working from home or unpaid leaves available for employees who want that option, but not to force that on anyone who doesn't pose a risk to others.

If an employee claims their symptoms are from another cause (e.g., allergies, asthma, common cold), the most risk-averse response would be to send them home with pay until the symptoms resolve or they can provide evidence of the other source of the symptoms.

According to the CDC, employees who share a household with someone who is infected—or who have been otherwise exposed—should self-quarantine for 10 days after their last exposure (exposure will be ongoing until the person they live with has recovered).

1. Quarantine can end after day 10 without testing if no symptoms have been reported during daily monitoring.

2. Quarantine can end after day 7 if the employee tests negative—but only if the test is taken at least 5 days into the employee's quarantine period—and if no symptoms were reported during daily monitoring.

> "If the employee feels well enough to work, consider whether they can effectively telecommute."

The CDC does not currently recommend special scrutiny or quarantine for those who have been exposed to an asymptomatic person who has been exposed to someone with COVID-19 (meaning you don't need to send everyone home to quarantine just because they worked with someone who has a sick family or household member).

Making Reasonable Accommodations

As part of managing individual health, you may need to make reasonable accommodations for employees. The Americans with Disabilities Act (ADA) requires reasonable accommodation for employees with disabilities, and state law may as well. If someone is requesting an accommodation because of a disability, you will engage in the interactive process and you may ask for a doctor's note.

Consider:

1. Recalling them last

2. Providing unpaid leave

3. Allowing them to work from home

4. Allowing or providing additional PPE

5. Providing additional hygiene and cleaning breaks

You don't legally have to accommodate people who have vulnerable family or household members (at least under federal law), but we recommend you do so whenever possible, to reduce the chance that someone's employment with you is the direct cause of an illness or death in their family.

3 Dealing with a Diagnosis

> "...it's imperative that organizations respond quickly when an employee is diagnosed."

As COVID-19 infection rates continue to climb, it's imperative that organizations respond quickly when an employee is diagnosed. Here are the steps employers should take:

Notify Employees

Employees should be notified of potential exposure in the workplace, but they should not be told who is sick. Employees won't like that they can't gauge their own risk, but the Americans with Disabilities Act (ADA) requires this type of information remain confidential. Don't worry if employees figure it out on their own, but make sure you're not the one to reveal the information (and don't drop sneaky hints to help them along).

Assess the Risk of Exposure and Quarantine If Advisable

If there was close contact for a prolonged period (about six feet or less for 15 minutes or more over the course of 24 hours), exposed employees should quarantine. If you aren't confident in your risk assessment, call your local or state health authority to help you determine which employees should quarantine.
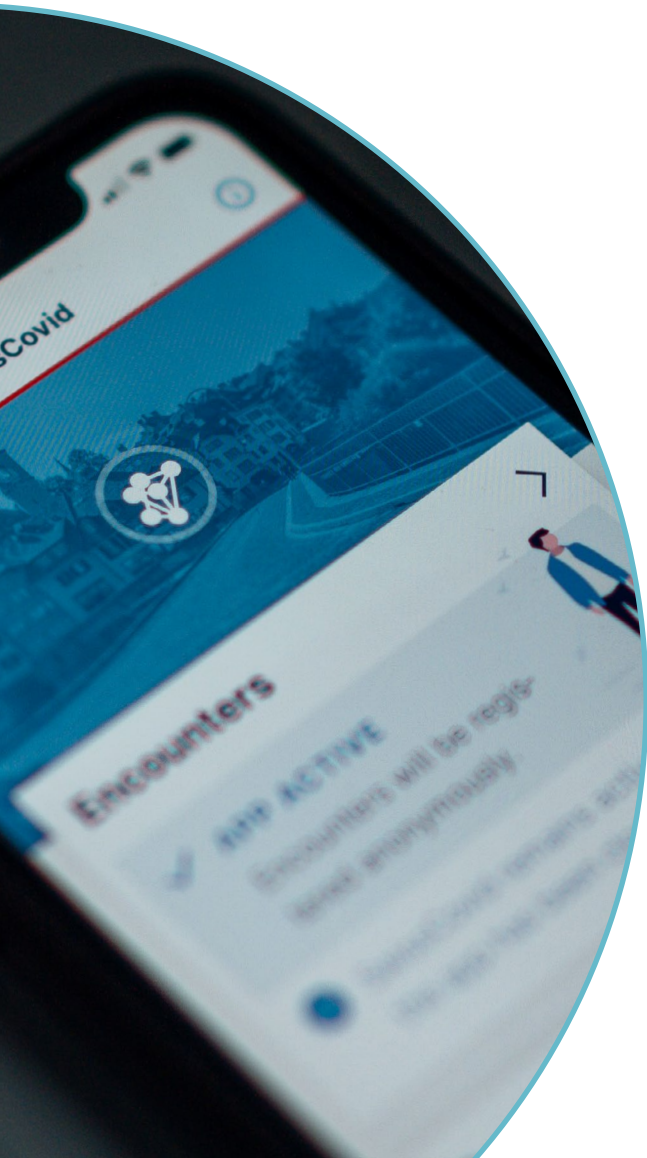
Disinfect Areas Used by the Sick Employee
The CDC recommends the following practices (among others):

1. Close off areas used by the person who is sick for 24 hours, if possible.
2. Open outside doors and windows to increase air circulation in the area.
3. Clean and disinfect areas and items used by the person who is sick (their workstation, bathrooms, common areas, tablets, touch screens, keyboard, registers). Wait as long as possible before cleaning and disinfecting.

If it has been seven days or more since the person who is sick was in the workplace, additional cleaning and disinfection is not necessary.

For more detailed instructions on cleaning and disinfecting the workplace after someone is diagnosed, and lots of great general guidance, see the **CDC's Guidance for Business and Employers**. Calling your local or state health authority is recommended as well.

Determine When an Employee Can Return to Work

Sick employees should work with their healthcare provider to determine when to return to the workplace. Generally, an employee will be okay to return when at least 24 hours have passed since resolution of fever without the use of medication, *and* other symptoms have improved, *and* at least 10 days have passed since symptoms first appeared or since the positive test result, if the employee is asymptomatic.