

# Post Pandemic Return to Work Guidance (COVID-19)

written by vickyp | June 7, 2021



## **Does the protocol include an employee/contractor self-declaration form?**

You are encouraged to implement a comprehensive screening and monitoring program to prevent COVID-19 infected individuals from entering the worksite. You should encourage employees to stay home if they feel sick and are exhibiting any symptoms related to COVID-19. You may also implement pre-shift screenings, which may include requiring employees/contractors to complete a self-declaration form that they are not exhibiting any symptoms related to COVID-19.

## **Does the protocol include disinfecting work areas and hygiene practices?**

The CDC has released guidance for cleaning and disinfecting public spaces, workplaces, businesses, schools, and homes. You should review this guidance when implementing your cleaning procedures. The CDC's guidance provides that for outdoor areas, you should maintain existing cleaning practices because viruses are killed more quickly by warmer temperatures and sunlight.

For indoor areas, the CDC recommends normal, routine cleaning for areas that have been unoccupied within the last seven days. For indoor areas that have been occupied within the last seven days, the CDC recommends that frequently touched surfaces and objects made of hard and non-porous materials (glass, metal, or plastic) be cleaned and disinfected more frequently. Frequently touched surfaces and objects made of soft and porous materials, such as carpet, rugs, or material in seating areas, should be thoroughly cleaned or laundered. If possible, the CDC recommends considering removing soft and porous materials in high-traffic areas. Surfaces and objects that are not frequently touched should be cleaned on a routine basis.

To clean and disinfect:

- If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection (Note: "cleaning" will remove some germs, but "disinfection" is also necessary).
- For disinfection, diluted household bleach solutions, alcohol solutions with at least 70% alcohol, and most common EPA-registered household disinfectants should be effective.
- Diluted household bleach solutions can be used if appropriate for the surface. Follow manufacturer's instructions for application and proper ventilation. Check to ensure the product is not past its expiration date. Never mix household bleach with ammonia or any other cleanser. Unexpired household bleach will be

- effective against coronaviruses when properly diluted.
- Cleaning staff should wear disposable gloves and gowns for all tasks in the cleaning process, including handling trash.
  - Gloves and gowns should be compatible with the disinfectant products being used.
  - Additional PPE might be required based on the cleaning/disinfectant products being used and whether there is a risk of splash. Follow the manufacturer's instructions regarding other protective measures recommended on the product labeling.
  - Gloves and gowns should be removed carefully to avoid contamination of the wearer and the surrounding area. Be sure to clean hands after removing gloves.
  - Employers should develop policies for worker protection and provide training to all cleaning staff on site prior to providing cleaning tasks. Training should include when to use PPE, what PPE is necessary, how to properly don (put on), use, and doff (take off) PPE, and how to properly dispose of PPE.
  - If you require gloves or masks or other PPE, prepare a simple half-page Job Safety Analysis (JSA): list the hazards and the PPE (gloves, masks, etc., as needed), and the person who drafts the JSA should sign and date it.

If you are using cleaners other than household cleaners with more frequency than an employee would use at home, you must also ensure workers are trained on the hazards of the cleaning chemicals used in the workplace and maintain a written program in accordance with OSHA's Hazard Communication standard (29 CFR 1910.1200). Simply download the manufacturer's Safety Data Sheet (SDS) and share with employees as needed, and make sure the cleaners used are on your list of workplace chemicals used as part of the Hazard Communication Program (which almost all employers maintain).

You should maintain routine cleaning and disinfection procedures after reopening to reduce the potential for exposure.

While not mandated, you should promote personal hygiene by providing additional short breaks to allow employees to wash their hands often and providing tissues and no-touch trash receptacles.

#### **Does the protocol include staggering the return of the workforce?**

In order to promote social distancing, you are encouraged to stagger the return of the workforce. Further, you are encouraged to stagger break times or create additional, temporary break areas. It is also advisable that you stagger when employees arrive and leave the workplace to avoid congestion in parking areas, locker rooms, and near time clocks. The key is to take as many steps and precautions to encourage social distancing as possible.

#### **Does the protocol include temperature screenings?**

You may implement pre-shift screenings, including taking employees' temperatures. You should not allow employees with symptoms or a fever of 100.4 degrees Fahrenheit or greater to enter the workplace.

#### **Does the protocol require medical clearance for those with elevated temps?**

For employees who have confirmed cases of COVID-19, the infected employee should remain at home until released by a physician or public health official. If a medical note releasing the employee is unavailable, follow the CDC guidelines on when an employee may discontinue self isolation, which contain specific requirements dependent upon whether the employee tested positive for COVID-19 and the symptoms exhibited.

## **Does the protocol include contact tracing?**

You should implement a plan for contact tracing after an employee is confirmed to have COVID-19. You should ask infected employees to identify all individuals who worked in close proximity (within six feet) for a prolonged period of time (10 minutes or more to 30 minutes or more depending upon particular circumstances, such as how close the employees worked and whether they shared tools or other similar items) with them during the 48-hour period before the onset of symptoms. Employers should send home all employees who worked closely with the infected employee for 14 days to ensure the infection does not spread. While quarantined, those employees should self-monitor for symptoms, avoid contact with high-risk individuals, and seek medical attention if symptoms develop. If they develop symptoms, they should remain home for at least seven days from the initial onset of the symptoms, three days without a fever (achieved without medication), and improvement in respiratory symptoms (e.g., cough, shortness of breath).

## **Does the protocol include isolation requirements for those who test positive COVID test?**

Have the infected employee follow the direction of their medical provider or local health official regarding the duration of self-isolation. If that guidance is unavailable, there are three options per the CDC for determining when a person may end home isolation, using either (1) a time since-illness-onset option, (2) a time-since-recovery option, or (3) a test-based option.

- Time-since-illness-onset and time-since-recovery strategy (non-test-based strategy): Persons with COVID-19 who have symptoms and were directed to care for themselves at home may discontinue home isolation under the following conditions:
  - At least three days (72 hours) have passed since recovery defined as resolution of fever without the use of fever-reducing medications and improvement in respiratory symptoms (e.g., cough, shortness of breath); and
  - At least seven days have passed since symptoms first appeared.
- Test-based strategy (simplified from initial protocol): Previous recommendations for a test-based strategy remain applicable. However, a test-based strategy is contingent on the availability of ample testing supplies and laboratory capacity as well as convenient access to testing. For jurisdictions that choose to use a test-based strategy, the recommended protocol has been simplified so that only one swab is needed at every sampling. Persons who have COVID-19 who have symptoms and were directed to care for themselves at home may discontinue home isolation under the following conditions:
  - Resolution of fever without the use of fever-reducing medications;
  - Improvement in respiratory symptoms (e.g., cough, shortness of breath); and
  - Negative results of an FDA Emergency Use Authorized molecular assay for COVID-19 from at least two consecutive nasopharyngeal swab specimens collected  $\geq 24$  hours apart (total of two negative specimens).
- Individuals with laboratory-confirmed COVID-19 who have not had any symptoms may discontinue home isolation when at least seven days have passed since the date of their first positive COVID-19 diagnostic test and have had no subsequent illness. For 3 days following discontinuing home isolation, asymptomatic individuals who have tested positive for COVID-19 should continue to limit contact (stay 6 feet away from others) and wear a covering for their nose and mouth whenever they are in settings where other people are present.

The EEOC has confirmed that you may require a doctor's note stating the employee is fit for duty before permitting them to return to work.

**Does the protocol require physical distancing at work?**

Employees should continue to maintain a six-foot distance from others and otherwise observe social distancing in the workplace as work duties permit. You should focus on social distancing rules for work areas and common areas such as restrooms, employee entrances and exits, vending/food services, conference rooms, and break areas.

**Does the protocol include non-essential travel restrictions?**

You should minimize non-essential business travel and adhere to CDC guidelines regarding isolation following travel. If possible, cancel non-essential travel.

**Does the protocol include employee Safe Return to Work Training/Education?**

You should train all staff in the additional healthy hygiene practices and cleaning/disinfection policies that you are implementing.

You should also plan on training employees and demonstrating the new safety measures in places to protect them from further spread of the virus. The more employees understand about what safety measures are being taken, and why, the more likely there is to be employee buy-in, and the less likely that employees may make complaints to OSHA or other third parties regarding perceived risk in the workplace.