

June 11, 2020

# RETURNING IN THE 'NEW NORMAL'

Navigating Employee Return-to-Work Under COVID-19



# INTRODUCTION

- Materials & Discussion only current as of today – rapidly changes environment
- Overview of some key points employers should consider (not all inclusive) for a successful re-opening
  - OSHA
  - Policies & Procedures
  - Preparing to Return to the Office
- Available Resources





Shall furnish to each employee, employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees.



Shall comply with occupational safety and health standards promulgated under this act.



**IMPORTANT**

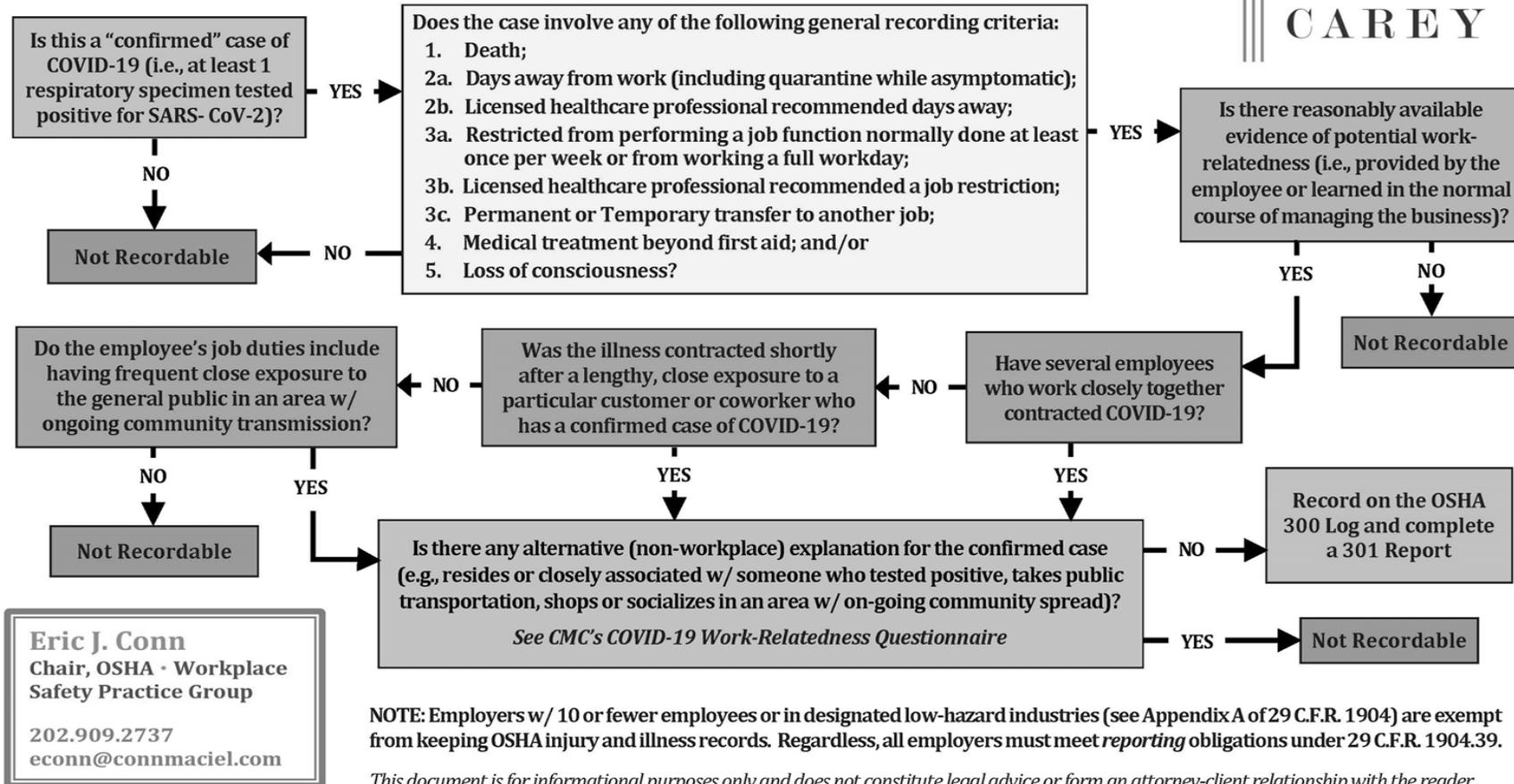
Reasonable Analysis to determine if employee contracted COVID-19 in the work environment and recording/reporting

**OSHA  
General  
Duty  
Clause**

# COVID-19 OSHA Recordkeeping Flow Chart

Use this flow chart to assess whether to record an employee's COVID-19 illness on the OSHA 300 Log.

CONN  
MACIEL  
CAREY



**Eric J. Conn**  
Chair, OSHA · Workplace  
Safety Practice Group  
202.909.2737  
econn@connmaciel.com

**NOTE:** Employers w/ 10 or fewer employees or in designated low-hazard industries (see Appendix A of 29 C.F.R. 1904) are exempt from keeping OSHA injury and illness records. Regardless, all employers must meet reporting obligations under 29 C.F.R. 1904.39.

*This document is for informational purposes only and does not constitute legal advice or form an attorney-client relationship with the reader.*

# COVID-19 Return to Work Pop Quiz

- To avoid invading an employee's privacy, an employer should only ask their employees to complete a health screen once per week.
  - True
  - False

The New Normal

# EMPLOYER POLICIES HOLISTIC APPROACH

1. **Infectious Disease Policy** (COVID-19)
2. **Conduct** (i.e. handshakes, personal space, masks, social distancing)
3. **Work Performance** (i.e. response times, deliverables)
4. **Business Travel** (essential, non-essential and approval process)
5. **Meetings** (Virtual, In-person, etc.)
6. **Salary/Compensation**
7. **Common Areas** (limited use)
8. **Meal & Rest Breaks**
9. **Flexible Work Arrangement** (Remote, Telecommuting, etc.)
10. **IT** (accessing network remotely requirements)
11. **Sick Days** (how many, reporting requirement, etc.)
12. **Emergency Paid Leave** (Sick & Expanded-FMLA)

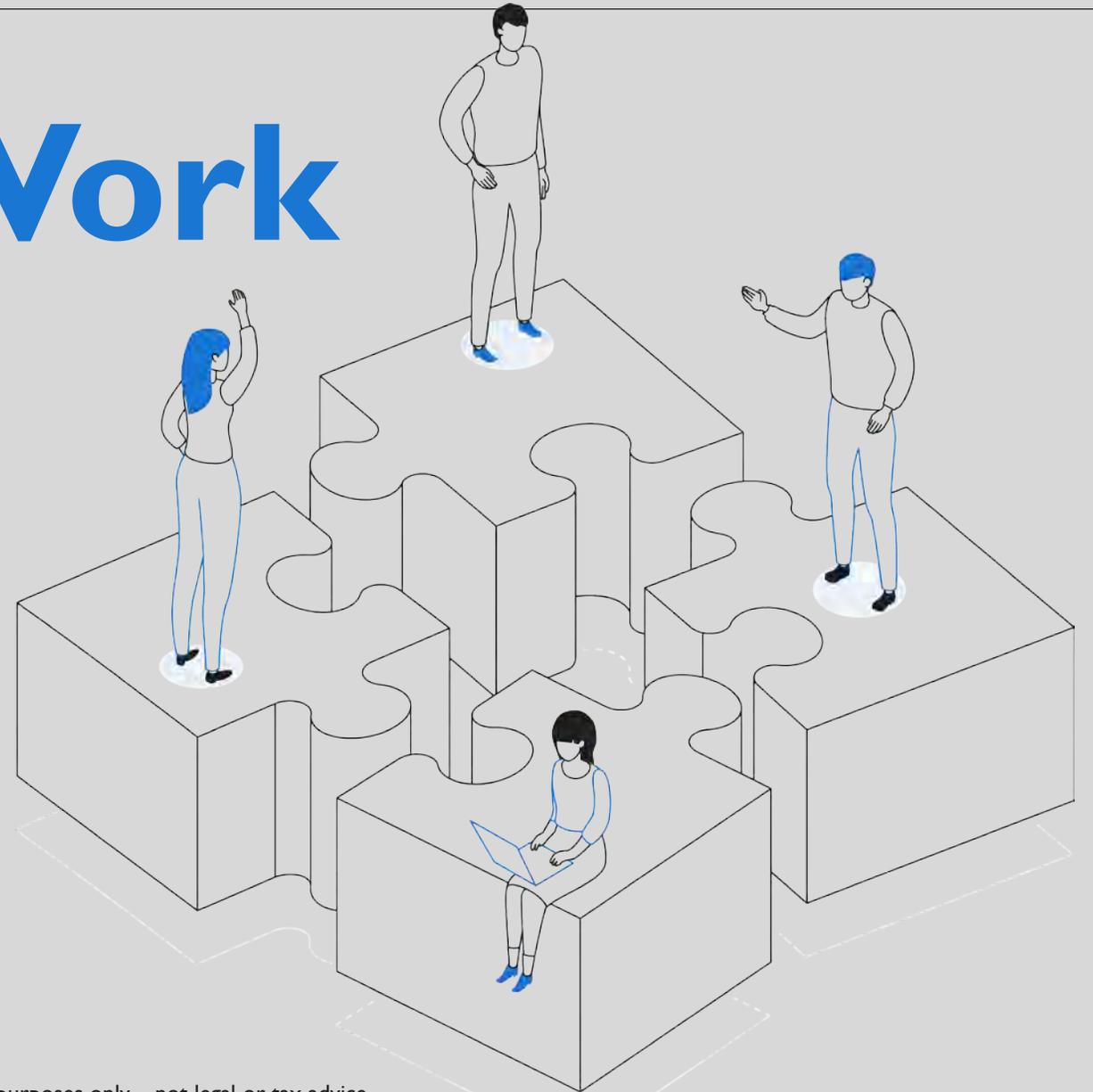
## Employers: Re-opening Points to Consider

- **Health & Safety Plan** (Response to COVID-19)
  - Contact Tracking
- **Building/Workplace Assessment**
  - How long as building been out of use
  - Conduct Deep Cleaning before employees return
  - Electrostatic cleaning
- **ID High Exposure Areas**, including high touch surfaces
- **Assess Physical Layout of Workplace**
  - Signage
  - Stairwell directions
  - Use of elevators
  - Social Distancing – including chairs in common areas & conference rooms
  - Partitions between workstations / sneeze guards
- **Assess Airflow** (increased air filtration)
- **Provide Resources for Employees** (proper PPE training)
  - Hand Sanitizer, disposable masks
  - Disinfectant Cleaning Wipes,
  - EAP & Health Benefits, etc.
  - Disposable plastic cups/plates
  - No touch trash bins

# Employee Communications

- **Return-to-Work Notification**
  - Phased in approach
  - Voluntary return
  - Staggered shifts/start times
- **What is being and has been done**
- **What is expected of employees**
- **Vacation/PTO Policies**
  - Potential adjustments / Exceptions
- **Consider FAQs for employees**

# Return-to-Work Guide for Employees



BROUGHT TO YOU BY



Material is for informational purposes only – not legal or tax advice

# Welcome back!

As we return to work and begin this “new normal” in our workplace, we understand that many employees are concerned about safety as well as the changes to company policies and procedures that we have implemented. We want every employee to be assured that we are taking your concerns and the well-being of our employees seriously.

*Editor's Note: This document is intended to help employers communicate to employees about new policies, procedures and practices specific to their workplace. Every workplace will differ, and employers should edit the information to reflect the circumstances in their own workplace.*

# What we are doing:

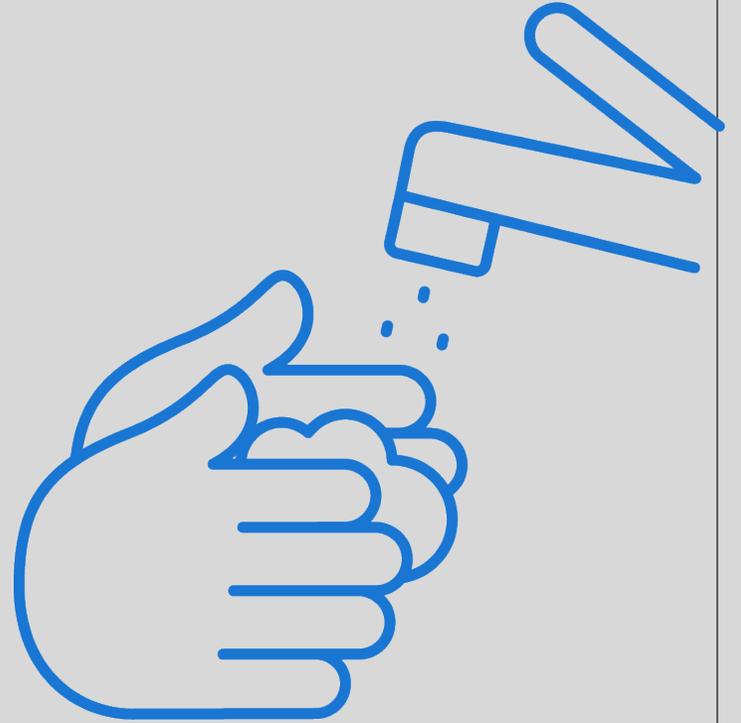
- All employees and visitors entering our buildings will be screened for COVID-19 symptoms and possible exposure.
- Common areas and frequently touched surfaces are being cleaned daily. Cleaning supplies will be available, and employees are encouraged to clean and disinfect workspaces throughout the workday.
- Hand sanitizer is provided throughout the building.
- Posters are displayed with reminders on how to prevent the spread of germs.
- Business hours have been modified to allow for staggered work shifts to reduce the number of people in the building at one time.
- Workspace layouts and seating arrangements are revised to allow for social distancing.
- Meeting rooms, break rooms and other communal areas have reduced seating and capacity limits.
- Hallways and stairways are marked as one-way to reduce face-to-face traffic.
- Business travel remains restricted to essential travel only.



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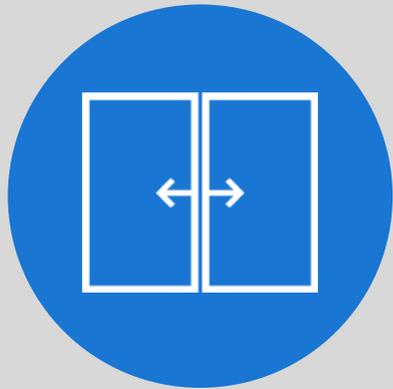
# What you can do:

- Stay home or go home if you are sick.
- Maintain social distancing practices in the workplace.
- Follow cleaning product instructions when cleaning your work areas.
- Wash your hands frequently or use hand sanitizer
- Cover your nose and mouth when sneezing or coughing.
- Avoid touching your face.
- Wear a face covering if you desire.
- Replace handshakes with head nods and waves.
- Avoid using other employees' phones, desks, offices or other work tools and equipment, when possible.
- Talk to your manager if you have concerns specific to your circumstances, such as a health condition that places you or someone in your household at high risk.
- Follow all company policies and practices.
- Be kind. Understand that this is a stressful time for everyone, and an extra bit of kindness right now can go a long way.

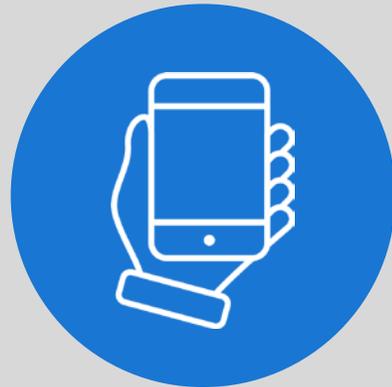


# Changes You May See at Work

In the months to come, we will continually be monitoring the pandemic circumstances and will consider implementing technology to keep our workplace safe going forward. Some of the new technology you may experience at any of our worksites include:



**Automatic  
doors**



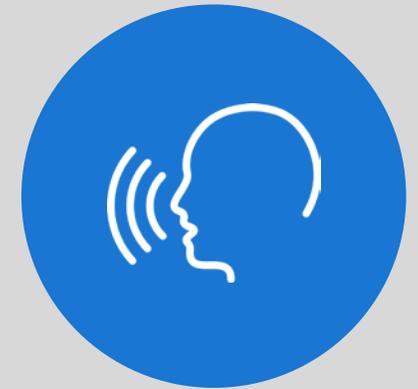
**Smartphone apps  
for timeclock  
entries**



**Motion-sensor  
lighting**



**Body  
temperature  
scanning devices**

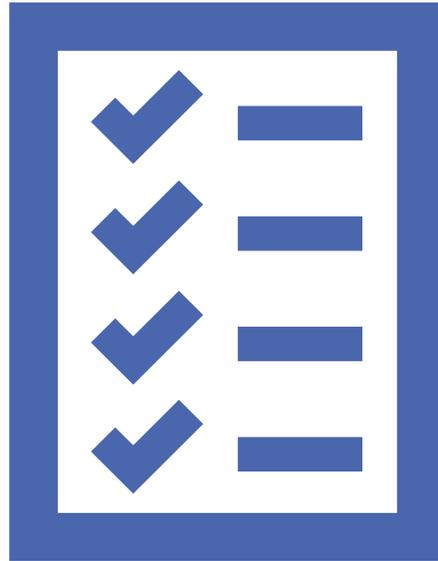


**Voice-activated  
elevator and  
intercom  
buttons**

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# Resources

- **CDC:**
  - <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/businesses-employers.html>
- **OSHA:**
  - <https://www.osha.gov/SLTC/covid-19/>
  - [https://www.osha.gov/memos/2020-05-19/revised-enforcement-guidance-recording-cases-coronavirus-disease-2019-covid-19#\\_ftn2](https://www.osha.gov/memos/2020-05-19/revised-enforcement-guidance-recording-cases-coronavirus-disease-2019-covid-19#_ftn2)
- **SHRM (membership may be required for some materials):**
  - <https://www.shrm.org>
- **North Carolina (COVID-19 Hub):**
  - <https://www.nc.gov/covid19>
- **Count On Me NC:**
  - <https://countonmenc.org/business-training/>
- **South Carolina:**
  - <https://dew.sc.gov/covid-hub/employerhub>
- **Ward & Smith, P.A.:**
  - <https://www.wardandsmith.com/articles/returning-to-work-in-a-pandemic-what-employers-need-to-know>



## Re-opening Recap

- Understand Federal, State, & Local Requirements
- Talk To Your Employees
- Create A Reopening Plan
- Plan For More Closures

# Contact Information

Keith Wheeler, SPHR, SHRM-SCP  
President & CHRO

**HR Resources of the Carolinas, LLC**

803.984.7325

[www.hrresourcesofthecarolinas.com](http://www.hrresourcesofthecarolinas.com)