



COVID-19: Return to Work Checklist

As states slowly start to loosen the restrictions on businesses to reopen, employers are faced with returning employees to work in unprecedented conditions. We know a return to work will not mean a return to the exact environment that was both familiar and common just a few months ago; rather it will likely be a gradual process and include a number of changes to policies, adjustments to physical layouts and new procedural requirements. Following are a number of steps to consider as you start the process of bringing your employees back to work and reopening your business:

PHASING IN THE WORKFORCE

Planning and Coordination

- Create a workplace task force that will be responsible for overseeing return-to-work decisions and COVID-19-related issues impacting the organization.
- Monitor [federal guidance](#), state and local orders as well as recommendations of the [CDC](#) and [OSHA](#) addressing COVID-19-related closures, re-openings, industry best practices and other geographic considerations.
- Consider a phased reopening to ensure readiness of staff, equipment and systems.
- Evaluate vendor and supply chain contracts to ensure they are adequate for restarting and sustaining operations; have contingency plans in place to prevent supply chain interruption.
- Review contracts and insurance policies to make sure all necessary areas of business are covered and consider filing insurance claims in the event of a loss due to a shutdown.

Recall Process

- Evaluate schedules and staffing needs, including contingency plans in case of increased absenteeism and vacancies.
- Communicate frequently and as transparently as possible with employees, providing expected timelines for recalling/rehiring employees and providing returning employees with recall or offer letters.
- If recalling only *some* workers who were laid-off or furloughed, ensure practices for determining who to recall do not discriminate against any group of employees, including age or underlying medical conditions.
- Review accommodation request and interactive process under the ADA to take into account requests for return-to-work accommodations by high-risk employees.
- Notify state unemployment agencies of employees recalled to work.

Basic Infection Prevention Measures

- Arrange for additional/enhanced workplace cleaning and janitorial services, following [guidance from the CDC](#).
- Develop exposure-response plan addressing isolation, contact tracing, communication, quarantine, [cleaning and disinfection](#), [OSHA reporting of recordable illnesses](#) and confidentiality.
- Educate employees on how to reduce the spread of COVID-19, following [CDC recommendations](#) and placing [posters](#) through the business to encourage social distancing and [handwashing](#).
- Require workers to self-monitor for symptoms of COVID-19 and to stay home if they are sick or suspect [possible exposure](#).
- Provide hand sanitizer, disinfecting wipes and/or other cleaning supplies for employees and customers, as well as no-touch disposal receptacles.

Personal Protective Equipment (PPE) Requirements

- Review state and local requirements involving PPE, such as masks, gloves and face shields, and address procurement to ensure adequate supplies are available.
- If PPE is required or recommended, implement process to either provide the equipment or reimburse employees.
- Communicate process for proper use, disposal and cleaning of equipment.

Protocol Modifications to Ensure Social Distancing

- Implement or continue offering flexible worksites (telework), flexible work hours and staggered lunch/rest breaks.
- Eliminate or limit shared equipment.
- Discourage physical contact with others (i.e., handshakes) whenever possible.
- Continue to limit face-to-face interactions and non-essential business travel, encouraging emails, instant messaging and virtual meetings internally and externally.

- Provide training/guidance to employees on social distancing.

Physical Worksite Modifications to Ensure Social Distancing

- Where possible, avoid job tasks that require close contact with others. If unavoidable, provide employees with face masks, face shields, physical barriers, and other workplace controls to ensure safety.
- Increase physical space between employees and customers (i.e., drive through, partitions).
- Consider designated walkways and directional traffic patterns throughout the worksite to minimize close contact.
- Discourage group gatherings by limiting capacity in or closing conference rooms, break rooms, locker rooms or other common areas.

Screening and Testing

- Evaluate value, timeliness, accuracy and risks of various screening methods, from screening questionnaires and temperature checks to molecular testing for active infections and serological testing for the presence of antibodies.
- Ensure confidentiality of all medical testing and results, reviewing for compliance with HIPAA, ADA and state/local privacy regulations.
- Consider compensability of screening times under applicable wage and hour regulations.

Customers and Visitors

- Determine which new workplace safety measures will apply to customers and/or visitors, such as face masks and/or screening.
- Establish entrance and access controls.
- Post signage prohibiting entrance for anyone with fever or symptoms of COVID-19 and reminding of social distancing protocols.

Employment Practices and Policies

- Consider use of remote interviewing techniques whenever possible.
- Remind managers of “do’s” and “don’ts” relating to pre-employment inquiries into applicants’ medical conditions.
- Evaluate telework policies, including availability on ongoing basis and/or as an accommodation as well as remote workplace safety assessments and cybersecurity.

Leave Management Policies

- Post the Families First Coronavirus Response Act (FFCRA) poster in a visible place, if applicable. Where employees will remain working from home, send by mail or post to Company intranet or employee website.
- Know how the FFCRA affects your previous policies and practices and ensure policies are updated appropriately.
- Review guidance on state- and local-mandated leave requirements.
- Consider implementing PTO/vacation rollovers or grace periods and review guidelines for usage if vacation is forfeited if not used by year end.

Benefit Policies and Eligibility

- Evaluate when benefits must be reinstated or whether a new waiting period should apply.
- Determine whether returning employees owe any retroactive benefit premiums and develop a reasonable plan for repayment, taking into account any state or local laws regarding wage deductions or required authorizations.
- If using the look-back measurement method, determine if adjustments to hours averaged during current measurement period are desired in order for employees to be eligible

during subsequent stability period; if so, seek approval from carrier/stop-loss.

- Consider whether benefit plan documents, should be amended to reflect coverage or deadline extensions based on COVID-related regulations and guidance.

Communication

- Orient employees to new company policies and procedures that have been implemented, including, at a minimum, screening for symptoms, hygiene etiquette, social distancing, PPE and sick policies.
- Train managers on dealing with employees who are facing increased personal challenges during this time, such as bereavement and loss, childcare and school closure challenges, financial stress and other dependent care and support needs.
- Ensure leaders are visible and are proactively responding to employee concerns and anxiety.
- Remind employees of your employee assistance program (EAP), or consider engaging with an EAP if you do not have one.
- Communicate your appreciation and welcome employees back to work.

Workplace Preparedness Plan

- Develop/refine workplace preparedness plan to address absenteeism spikes, a second pandemic wave or future business interruptions.
- Implement a preparedness plan to continue essential business functions.
- Consider flexible work schedules, telework and leave policies.
- Cross-train employees on performing essential business functions.