



Preparing the Workplace for the Return of Employees

**If you have any questions regarding COVID-19,
please do not hesitate to contact our
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Preparing the Workplace for the Return of Employees Amidst the COVID-19 Pandemic

Most businesses across the country are anxious to reopen and employees are excited to get back to work. Ensuring a safe reopening is crucial, however, and should be given significant focus and effort. If a business reopens only to have several employees contract and spread coronavirus amongst the workforce, the effect could be even more devastating than a temporary closure.

Below is a general checklist that employers may use to help prepare for a safe reopening. Though appropriate measures will vary by specific type of work environment, this checklist may be useful as a general guide. Be aware that, as the situation regarding COVID-19 evolves, the guidance issued by the EEOC, CDC and other federal agencies may change and should be monitored frequently.

Monitor Employee Health

- Tell employees who feel sick to notify their employer and stay home.
- If an employee tests positive for COVID-19, instruct him or her to notify the workplace and stay home for at least 10 days.ⁱ
- Instruct employees who have not tested positive but are exhibiting symptoms of COVID-19, such as fever, coughing and shortness of breath to stay home for at least 3 days after resolution of symptoms and 10 days after symptoms first appeared.ⁱⁱ
- If any member of the employee's household is sick and exhibiting symptoms of COVID-19 or has been diagnosed with COVID-19, instruct the employee to stay home and self-monitor for 14 days.ⁱⁱⁱ
- Consider requiring employees to wear personal protective equipment such as face masks, gloves and/or gowns while at the workplace.
- Evaluate whether taking employees' temperature either upon initial return to work or on a daily basis would be a good practice for the particular business.^{iv}
- If an employee or customer becomes sick while at the workplace, have a plan for immediate isolation and/or removal of that individual.
- If one employee tests positive for COVID-19, the employer should notify other employees of their potential exposure but the employer should not disclose the identity of the infected employee.^v

Require Good Hygiene Practices

- Require that employees wash their hands often with soap and water for at least 20 seconds. Ensure that soap is available for their usage.^{vi}
- Consider placing hand sanitizer at multiple locations throughout the workplace to encourage frequent use.
- Instruct employees to avoid touching their eyes, nose or mouth with unwashed hands.
- Provide tissues for employees and instruct them to cover their mouth and nose with a tissue when they cough or sneeze (or use the inside of their elbow). After coughing or sneezing, instruct employees to immediately dispose of the tissue and wash their hands.
- Tell employees not to use another worker's desk, workspace, telephone, computer or other work-related tools.

ⁱ <https://www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html> It is not recommended that employers require a doctor's note confirming that the employee has COVID-19 to validate sickness as medical providers may not be able to timely provide such documentation.

ⁱⁱ <https://www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html> Other symptoms of COVID-19 may include sore throat, headache, chills, muscle pain and sudden loss of sense of smell or taste.

ⁱⁱⁱ "Note that recommendations for discontinuing isolation in persons known to be infected with COVID-19 could, in some circumstances, appear to conflict with recommendations on when to discontinue quarantine for persons known to have been exposed to COVID-19. CDC recommends 14 days of quarantine after exposure based on the time it takes to develop illness if infected. Thus, it is possible that a person known to be infected could leave isolation earlier than a person who is quarantined because of the possibility they are infected." <https://www.cdc.gov/coronavirus/2019-ncov/hcp/disposition-in-home-patients.html>

^{iv} Not every individual who tests positive for COVID-19 has a fever.

^v The area occupied or visited by the sick individual should be immediately closed to other employees. If possible, open doors or windows to allow for ventilation and wait 24 hours, or as long as practical, before cleaning and disinfecting the area.

^{vi} If soap is not available for some reason, provide employees with an alcohol-based hand sanitizer that contains at least 60 percent alcohol.

Ensure Physical Distancing

- Allow employees to work from home, if possible.
- Ensure that employees have adequate space to work at least 6 feet from anyone else while at work and instruct them to maintain that distance at all times.
- Eliminate in-person meetings. Instruct employees to communicate by email or telephone rather than in person.
- Stagger work shifts to reduce the number of employees in the workplace at any given time. Also consider staggering break and lunch times to reduce the number of employees in one location or room at the same time.
- Remove extra chairs from common areas and position the remaining ones at least 6 feet apart.
- Eliminate all non-essential work-related travel.
- Cancel work-sponsored conferences or other large gatherings.
- Request that employees notify the workplace about personal travel and, if the location visited was known to have a coronavirus outbreak, consider asking the employee to stay home for 14 days and self-monitor for symptoms.

Implement Environmental Controls

- Frequently disinfect all common workspace surfaces and objects that workers must touch with disposable wipes or paper towels and EPA-approved disinfectants known to kill COVID-19.^{vii}
- Provide cleaning supplies so employees can sanitize their individual workspace before each shift.
- Consider leaving doors and cabinets open so employees do not have to touch knobs or handles.
- If frequently touched surfaces, such as light switches, can be turned on and taped in the on position, consider doing that.
- Limit the number of employees that may touch or come in contact with frequently used equipment or tools.
- Remove or limit the usage of common items such as dishes, coffee pots, drink machines, microwaves and refrigerators.
- Remove cloth towels and other soft or porous items and replace them with paper towels.
- Provide no-touch trash cans.
- If employees must frequently come in contact with customers, consider installing clear shields, such as plexiglass, between them.
- Don't forget to clean and disinfect, if necessary, outdoor common areas, such as tables and benches.
- Consider making porous and difficult to clean surfaces, such as fabric sofas and chairs, off-limits given the difficulty involved with disinfecting them. Remove rugs from common areas and store them temporarily.

^{vii} This could include handrails, doorknobs, timeclocks, group workstations, etc.