



Return to the Workplace

Employee Policies & Safety Measures

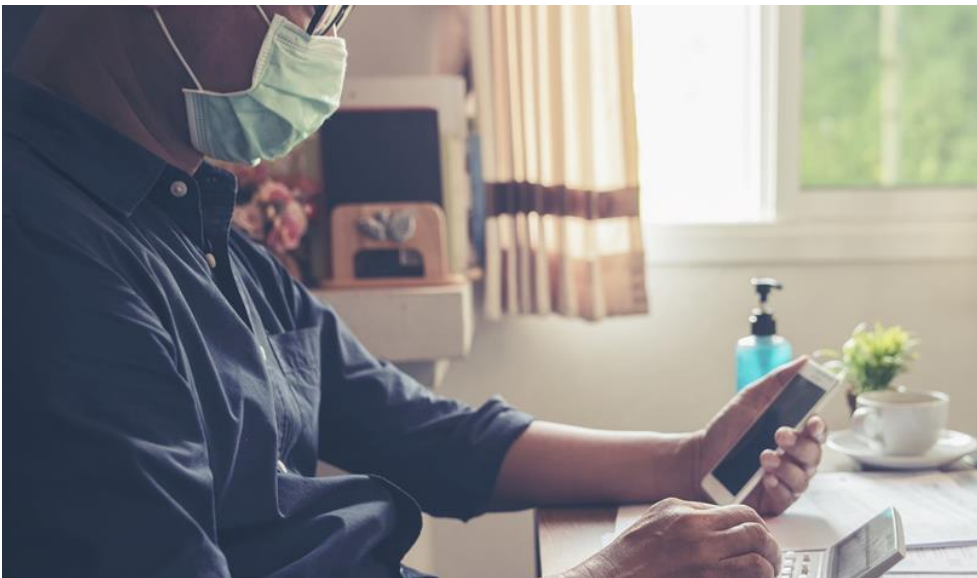
May 22, 2020

Although returning to the workplace may look quite different from what we were accustomed to, our goal is to help make the transition back to business as smooth as possible. With the health of your employees and your organization's priorities top of mind, we developed a list of initial considerations for you to explore as you define your return to the workplace program. In addition to the below list of considerations, we have offered resources where applicable.

We recognize each company will implement different variations of these considerations depending on the nature of your business, industry best practices, and other requirements. Additionally, we encourage you to review local and state government orders, and to seek legal guidance for any protocols you choose to implement as deemed appropriate.

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Considerations in Preparation to Return

1. Assess your organization's readiness to bring employees back to the workplace, in conjunction with reviewing industry best practices and guidelines from appropriate sources.
2. Depending on the size of your organization, you may consider developing a Return to the Workplace task force. This will look different for each company but would generally consist of representation from human resources, facilities, IT, internal communications and executive leadership. You may determine it's important to include employees on the task force as well, who would provide feedback on your pending protocols.
3. If you're unclear about how your employees feel regarding returning to the workplace, consider deploying a brief survey. Generally conducted anonymously, the survey could include questions to gauge if employees feel they have the tools to successfully work remotely, if they have any barriers or challenges with potentially returning to the workplace (i.e. childcare, health status, etc), the tools and resources they need to feel better supported, and other topics relevant to your workforce.
4. Similar to how you may have safety ambassadors in your building (i.e. employees who are designated to play a role during an emergency), consider identifying 'social-distancing ambassadors' who will play a key role to remind fellow employees of protocols you choose to implement.

Employee Health Considerations

1. Check with your local state, county, and city government officials to determine if you will need to require employees to wear masks or other personal protective equipment. If required be sure to, communicate to your employees whether your organization will provide these items or if employees need to supply their own. Also consider if employees will be required to wear masks at all times, or only while in designated areas. If employees need to supply their own face coverings, be sure to let them know what the acceptable standard is. Please review the resources below to help you as you contemplate this issue.



[CDC describes the use of face coverings to help slow the spread of COVID-19.](#)



[Comply with relevant regulations issued by your OSHA jurisdiction.](#)

- [Federal OSHA - Guidance on Preparing Workplaces for COVID-19](#)
- [Federal OSHA - Personal Protective Equipment](#)

2. Consider whether or not you want to conduct health screenings, such as temperature checks, health questionnaires, etc. You may also want to consider providing employees with thermometers to monitor themselves before arriving to your premises. Review the resources below for more guidance on this topic.
- The FDA has offered a [policy for electronic thermometers](#).
 - CLIA outlined regulations for [medical equipment](#).
 - The EEOC has issued guidance on [temperature checks](#). Consider how thermometers will be sourced and understand that shipping delays may occur.
 - MMA has identified vendors who can conduct screenings. Please contact your MMA team for information.
 - Consider using the free COVID-19 [screening tool developed by Apple](#) in Partnership with the CDC and download the free app from Apple's App Store.
 - View Marsh & McLennan Agency's (MMA)'s [example temperature check process](#) to help shape your procedures.



3. Review and consider mass testing options for your workforce, while also considering your budget and employees who may fall into a “protected class”. Keep in mind that requiring testing for all employees may violate one or more legal rights for those who are considered protected. An employer can require testing before employees enter the workplace, and send home those who test positive or decline to test. It’s important therefore to consider whether the employee can work remotely from home or should receive paid/unpaid leave. Guidance from the EEOC supports this advisement and addresses concerns under the ADA. Testing types and considerations are noted below:



COVID-19 Testing: The current gold standard test (nasopharyngeal swab) is uncomfortable, and can make it difficult to get a good sample, leading to high false negative rates, regardless of who takes the sample (RN, MD, etc). *A new saliva based test has been released which will eliminate for the need for uncomfortable nasal swab.

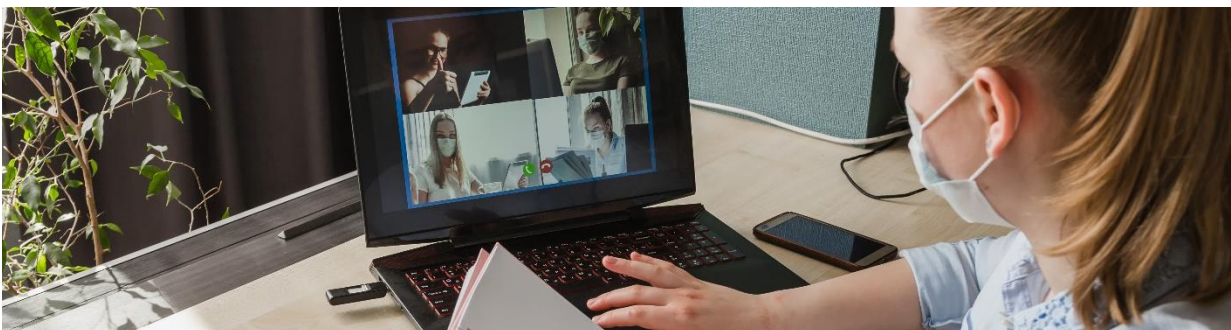


Antigen Tests: The antigen test confirms acute infection. If negative, when do you test again? The answer has not been defined, so frequent re-testing can add costs, and lead to uncertainty among the workforce, etc.



Antibody Tests: In the absence of a vaccine, the best test would be an antibody test (some were deployed mid-April in Pennsylvania and there could be more wide-spread availability soon). This should show who has been infected and recovered, might have natural immunity, and should be okay to return to work.

4. If you choose to conduct health screenings, establish a privacy policy to ensure employees' personal information is protected. We have provided resources below to help you shape this.
 - [Sample policies](#) are available from SHRM (login required).
5. Educate your employees on handwashing, coughing etiquette, and any cleaning procedures the company has implemented. A number of resources have been identified below.
 - How [COVID-19 spreads](#), as prepared by the CDC.
 - [Proper handwashing](#) as suggested by the CDC.
 - [Face Mask Wearing Guide](#) prepared by MMA, sourced from the World Health Organization (WHO) and San Francisco Department of Health.
 - [List of disinfectants](#) for use against COVID-19 provided by the EPA.
 - [CDC pre-made posters on a variety of topics](#), available in both English and Spanish.
6. Identify and communicate preferred greeting methods (i.e. excluding handshakes, hugs, etc.). Suggestions and resources are provided here:
 - [Exploratorium](#) offers greetings in the time of COVID-19.
 - The World Health Organization (WHO) developed [suggestions for greetings](#).
7. Determine a process to identify higher risk individuals and determine the type of flexible work plans you will offer them.
 - The [CDC provides information](#) about who is at a higher risk for severe illness.
 - [OSHA](#) outlines information on workplace-related exposure risk.



8. Continue to encourage sick employees to stay home and develop a plan for what to do if an employee becomes sick at work. Some thoughts and suggestions pertaining to this topic include:
- Employees who have symptoms (i.e., fever, cough, or shortness of breath) should notify their supervisor they are ill and stay home.
 - Employees who appear to have symptoms (i.e., fever, cough, or shortness of breath) upon arrival at work or who become sick during the day should be sent home.
 - Employees who are ill should follow the steps listed below recommended by the CDC:
 - Stay at home, get rest, and stay hydrated.
 - Communicate with your health provider.
 - Be sure to get care if you have trouble breathing or if you think it is an emergency.
 - Employees should not return to work until meeting the criteria to discontinue isolation in accordance with healthcare providers, state and local health departments, and company policy.
 - Employees who are well but who have a sick family member at home who has been diagnosed with COVID-19 should notify their supervisor and maintain quarantine in accordance with healthcare providers, state and local health departments and company policy.
9. Identify and share suggested actions for employees if they believe they have been exposed. The references below are relevant sources you may want to provide employees.
- [CDC Symptoms of Coronavirus.](#)
 - [CDC Self-Checker.](#)



Employee Benefits Resources

1. Work with your MMA team to communicate with your employees about the resources available to them through your benefits program, such as:



Employee Assistance Program (EAP)



Telehealth program resources



Medical Carrier COVID-19 coverage information



Financial assistance, loan Programs, etc.



Wellness program resources

2. Supplement the resources offered through your benefits program with additional information, such as:
 - [MMA's Covid-19 Employee Resource Guide](#)
 - MMA Financial Wellness resources, including [Budget Friendly Activities](#), [Stimulus Check Strategies](#), and more. This information can be found on the MMA Coronavirus Resource Page under [Financial Wellness](#).
3. Communicate where employees can go if they are seeking testing.
 - The CDC has information about [Testing in the United States](#).
 - GoodRx also published information about [Drive-Thru Testing](#).

4. Provide childcare support and resources, if available.
 - Your MMA team can provide information pertaining to approved ongoing daycare or back-up care vendors. Please reach out to us for more information.
5. Encourage employees to receive annual medical exams and care for their overall health.



Work Environment & Physical Distancing Considerations

1. Consider developing a phased approach or staggered work shifts for employees.
2. Consider developing a process for proper, enhanced workplace cleaning (e.g. partner with cleaning company).
 - The CDC offers considerations for employers regarding [how to clean and disinfect](#).
 - For commonly, used items in the breakroom, such as the refrigerator door handle, microwave, coffee machine or water dispenser, consider how you will maintain the cleanliness of those items, remove them, and/or replace them with touch-free counterparts.
 - Consider supplying employees with disinfectant wipes or hand sanitizer, if available.
 - Per your Hazard Communication Program, train employees on the Safety Data Sheets for each disinfectant and sanitizer introduced into the workplace.
3. Determine if you will close off certain entrances or exits to your building. Be sure to comply with proper exit routes should there be an emergency requiring your employees to leave the building.

4. If elevators are present in your building, work with your building's facilities team to consider and communicate new maximum capacity and other standards (such as requesting employees to stand at the corners of the elevators and face the walls).
5. The implementation and communication of social and professional distancing protocols can be key to a successful return to the workplace for your workforce. This may include:
 - Enforcing limit count in restrooms, breakrooms, lunchrooms, meeting rooms, designated smoking areas, etc.
 - Evaluating the need to rearrange tables, chairs, or other items in common areas.
 - Altering your floor plan, adding in protective elements or other measures.
 - Adjusting the square footage per person permitted at your physical workplace.
 - Implementing physical space between individuals through partitions or other mechanisms.
 - Consulting social distancing guidelines [offered by the CDC](#).
6. Communicate in-person meeting guidelines such as limiting attendee count and recommendations for virtual meetings, even while in the same physical location.
7. Develop guidelines for visitors (e.g. only "essential" visitor meetings permitted, limit attendee count, etc.).
8. Consider suspending the use of standing desks in open floor plan arrangements without proper high partitions. This may prevent cough or sneeze droplets from traveling in an unwanted direction.
9. Wherever you choose to implement restrictions, such as in restrooms, common areas, or conference rooms, consider creating signage to remind employees of the new guidelines.
10. [Per the CDC](#), it appears unlikely that COVID-19 can be transmitted through food, though additional research is needed. Employers may want to consider modifying workplace food policies such as:
 - Using wrapped, single-use food utensils.
 - Reviewing local county Department of Public Health information to determine if restaurant delivery/catering vendors are following designated food safety protocols.
 - Offering the 'boxed' lunch or individually wrapped items in place of self-serve open containers when conducting events for employees, customers, etc.
 - For common area fruit or snack bowls, placing a sign that requests individuals resist touching multiple items.

Company Policy Considerations

1. Develop a business continuity procedure to “contain, plan, mitigate, and follow up” if a worker tests positive for COVID-19 in the workplace. This may include but is not limited to:
 - Employee/ Vendor tracking.
 - Quarantine and return to work procedures.
 - Identifying areas that were affected to determine the need for equipment shutdown, production adjustments, or complete shutdown.
 - Scope of cleaning procedures.
2. Many states have instituted legislation, executive orders and regulatory directives with respect to the compensability of workers compensation claims related to COVID-19 illness. These directives may shape your return to the workplace decisions and timeline. View the [Oliver Wyman Actuarial Consulting Workers Compensation Regulatory Update](#) for more details.
3. Develop policies and procedures regarding when employees should be allowed to return to work following isolation and/or quarantine. The [CDC offers guidelines](#) regarding this topic.
4. Develop a plan for how and when to lift business travel restrictions.



The CDC regularly updates the [travel page related to COVID-19](#), which may help inform your plan for business travel.

5. Be prepared for continued remote work requests from employees. Consider implementing a policy or set expectations moving forward.

For your reference:

- According to OSHA regulations, employees may only refuse to work if they believe they are in imminent danger. Section 13(a) of the Occupational Safety and Health Act (OSH Act) defines “imminent danger” to include “any conditions or practices in any place of employment which are such that a danger exists which can reasonably be expected to cause death or serious physical harm immediately or before the imminence of such danger can be eliminated through the enforcement procedures otherwise provided by this Act.”



















[SHRM offers a resource](#) regarding what employers can do when fearful workers don't report to work due to COVID-19.

Additional Resources

Review additional information available from Marsh & McLennan Agency and other viable sources to help shape your return to work program.

- [MMA Coronavirus Resource Page](#)
- [Marsh Returning People to the Workplace Safely](#)
- [MMA CARES Act Information](#)
- [MMA Article regarding Families First Coronavirus Response Act](#)
- [CDC Interim Guidance for Businesses](#)

The chart below highlights a few of the key strategies you may choose to implement from the considerations list. In the row for each strategy, we have noted how simple it may be for your organization to implement the respective consideration, how effective we anticipate the strategy to be, as well as how costly.

Strategy	Implementation Scale (Easy to Difficult)	Effectiveness Score (low 0 – high 5)	Cost
 Social Distancing		5	\$
 Cleaning/Disinfecting		4	\$\$
 Masks		3 - 4	\$
 Employee Communications		4	\$
 Enhanced paid sick leave policies		4	\$\$\$\$
 Screening Questionnaires		2	\$\$
 Temperature Screening		2	\$\$
 Antibody Screening		2	\$\$\$\$
 Virus Screening (i.e. Diagnostic)		3	\$\$\$\$

It's our business
to be there for you in the

**MOMENTS
THAT
MATTER.**

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