SafetyInfo

CAREFULLY AND SAFELY UNLOCKING BUSINESSES AFTER LOCKDOWN FOR COVID-19 IS OVER

Since every workplace is unique, no single plan can fit every business. However, all plans follow a similar framework, and employers should evaluate options to fill in that framework.

In general, a plan should address:

- Minimizing the risk of transmission to employees, vendors, and customers;
- Maintaining a clean and healthy work environment; and
- Balancing safety with continuity of business operations.

Balancing safety does not mean weighing the risk of transmission against profitable operations. However, some control measures simply won't be feasible in every situation.

Not all employees can work from home, for example, but workstations might be set up six feet apart. The key is to find the most protective option that is the least disruptive to business operations.

UNDERSTANDING THE THREAT

To develop effective plans, employers need to understand the nature of the threat. The currently threat is the SARS-CoV-2 virus that causes COVID-19. According to the Indian Council of Medical Research (ICMR), transmission is most likely from person to person due to respiratory droplets from a cough or sneeze. Even speaking to someone in close proximity might cause transmission.

A study by the New England Journal of Medicine (NEJM) found that the SARS-CoV-2 virus can be detected on surfaces for hours or even days (Aerosol and Surface Stability of SARS-CoV-2 as Compared with SARSCoV-1). ICMR stated that transmission "from surfaces contaminated with the virus has not been documented." This doesn't mean it hasn't happened, since documenting a case would be challenging. Surface transmission is not thought to be the main way the virus spreads, but caution dictates cleaning and disinfecting surfaces.

ICMR also stated, "It is unknown how long the air inside a room occupied by someone with confirmed COVID-19 remains potentially infectious." Factors like ventilation, temperature, and humidity may affect the duration. The NEJM study found that the virus "remained viable in aerosols" for at least three hours, and stated that transmission via

aerosols is plausible. This does not necessarily mean it presents a high risk. However, if a group of people (one or more of whom are infected) use a conference room, and another group uses the same room within a few hours, aerosol transmission could be possible.

FACTORING IN DISTANCE AND DURATION

A number of factors impact the risk of transmission, but the primary two are distance and duration. In simple terms, the more time people spend in close proximity, the more likely an infected person could transmit the virus. As distance increases and duration of contact decreases, the risk of transmission decreases.

FACTORS THAT AFFECT WORKERS' RISK FOR EXPOSURE INCLUDE

- DISTANCE – Employees often work close to one another, and may also be near each other when clocking in or out, during breaks, or in locker/changing rooms.

- DURATION OF CONTACT – Employees often have contact with coworkers for an entire shift. Continued contact with potentially infectious individuals increases the risk of transmission.

- TYPE OF CONTACT – Workers may be exposed through respiratory droplets. Possible exposure could occur via contaminated surfaces or objects such as tools, workstations, or break room tables. Other factors that may increase risk include carpooling, taking public transportation, or socializing with coworkers outside the workplace.

Note that distancing involves both physical and temporal (time) distance. For example, maintaining six-foot separation may not be sufficient if employees are in a small room for several hours. Similarly, a brief contact at very close distance (such as speaking directly into a coworker's ear in a noisy environment) might increase the risk of transmission.

DEVELOPING PLANS TO REDUCE TRANSMISSION RISKS

Plans for reopening should address measures to minimize the risk of transmission. Some plan steps should include:

- Encourage sick employees to stay home. Separate them and inform other employees,

- Employees who are well but who have a sick family member at home with COVID-19 should notify their supervisor and follow ICMR recommended precautions.

- Educate employees about how to reduce the spread of COVID-19.

- Establish policies and practices for social distancing. Minimize meetings and group gatherings.

- Support respiratory etiquette (masks, coughing) and hand hygiene (handwashing, sanitizer).

- Plan for routine cleaning and disinfecting.

- Perform enhanced cleaning and disinfecting after persons suspected or confirmed to have COVID-19 have been in the facility. If someone suspected or confirmed to have COVID-19 was in the facility, but more than seven days passed, ICMR stated that special disinfecting is not necessary because the virus cannot survive that long. Otherwise, the ICMR recommends the following:

- Close off areas used by the person.

- Open outside doors and windows to increase air circulation in the area.

- Wait 24 hours before cleaning or disinfecting, if feasible, or wait as long as possible.

- Clean and disinfect all areas used by the person, including offices, bathrooms, common areas, or shared equipment.

Once an area has been disinfected, it can be opened for use. In addition, the employer should try to identify anyone with whom the infected person had contact. Those individuals should be informed that they may have been exposed to the infection, but not told the identity of the person. They should be provided with information and support to understand their risk, how to separate themselves from others, and how to monitor themselves for illness. They should also be informed of the possibility that they could spread the infection to others even if they do not feel ill.

Be aware that some employees may be at higher risk for serious illness, such as those with chronic medical conditions. Consider minimizing face-to-face contact between these employees or assign tasks that allow them to remain six feet from others if possible.

TAKING TEMPERATURES

Some companies check workers' temperatures before allowing them to enter the facility, and some provide questionnaires that employees fill out before returning to work. Employers may want to avoid using written questionnaires, and avoid documenting temperatures.

Employees might instead be required to take their own temperature at home, and call in sick if the reading is over 100.4 degrees. They should also report any symptoms that may arise while at work, and go home if they are feeling sick. Employers should not require a COVID-19 negative test before allowing an employee to return. Healthcare providers may be busy and unable to provide documentation in a timely manner.

IMPLEMENTING CONTROL MEASURES

Employers considering control measures should first evaluate the most effective options. If those aren't feasible, employers should work down the hierarchy.

First, ELIMINATE the hazard if possible. Working from home eliminates the risk of transmission from one employee to another. Holding virtual meetings over video chat also eliminates direct contact. Consider options to eliminate close interpersonal contact whenever possible. This includes not only employees but customers, vendors, and contractors.

Second, ISOLATE the hazard using engineering controls. This includes cleaning and disinfecting areas used by multiple people, ensuring that ventilation is sufficient, installing barriers, or using touchless equipment such as water faucets. Frequently touched surfaces should be cleaned and disinfected at least daily, or even several times each day. Soft and porous materials are not as easy to disinfect as hard and non-porous surfaces. Materials such as area rugs and padded chairs might be removed or stored to reduce the challenges with cleaning and disinfecting them. Outdoor areas do not need to be disinfected.

Third, REDUCE THE RISK using administrative or work practice controls. This is where social distancing falls, and includes not only physical distance (like staying six feet apart) but distancing in time (reducing the duration of contact). Grouping workers together may reduce the risk of transmission by minimizing the number of different individuals who come into close contact with each other.

Finally, PERSONAL PROTECTIVE EQUIPMENT (PPE) can help prevent healthy employees from contracting the virus. Note that the cloth masks that have become so fashionable are not PPE. Although masks offer some protection, their primary purpose is not to protect the wearer. Rather, masks limit the wearer from introducing respiratory droplets that might infect others if the wearer is infected.

Employers may require masks, and may usually require workers to provide their own masks, although some state or local laws may require employers to provide them. Workers may need several masks per day, especially if they sweat or work in dusty environments. However, workers might not need to wear a mask all day. For example, an

employee working in his or her own office might wear a mask only when leaving that office.

Each person may react differently to wearing a mask, ranging from a feeling of claustrophobia to difficulty breathing. Employers may need to provide accommodations for individuals with medical conditions. Since a mask could be contaminated, ICMR noted that individuals should properly remove a mask and immediately wash their hands or use hand sanitizer before touching anything else. ICMR indicates that a normal laundry cycle is sufficient to clean a mask.

Employers should also have a plan to address noncompliance with the control measures adopted. A requirement to wear masks, for example, should be enforced to be effective. Employers should consider what consequences will be imposed for noncompliance.

ESTABLISHING A CONTINUITY PLAN

By this point, employers should have identified essential workers and critical business operations. These should be addressed in a business continuity plan to ensure the company can continue operating even if key individuals or resources are not available. This requires identifying key contacts and back-ups, verifying chains of communications with suppliers and customers, and establishing a process for tracking and communicating about business and employee status.

Some businesses might find that certain operations cannot continue, either because the risks cannot be satisfactorily mitigated, or because required materials cannot be obtained, or even because there's no distribution network for the product.

Finally, employers should plan for a potential second wave of the pandemic, including plans for dealing with spikes in absenteeism if employees get sick or take time off to care for family members.

Workers want reassurance that their employer can keep them safe upon returning to work. Employers should be prepared to explain what measures are in place, outline a process and contact person for reporting concerns, and anticipate likely questions. Organizations will also need to prepare managers to answer questions from employees.

Some questions might include:

- DO I HAVE TO COME BACK? Employers can require employees to come back, but concerns about returning to work may vary depending on their personal circumstances. Work with each individual, considering options for leave or accommodations

- HOW WILL THE COMPANY KEEP EVERYONE SAFE? Outline the procedures for distancing, disinfecting, physical barriers, temperature screening, and other safety efforts.

- DO WE HAVE TO WEAR MASKS ALL DAY? Employers may require masks, but some workers might not need to wear them all the time.

- I'VE USED ALL MY SICK LEAVE. WHAT IF I GET SICK AND NEED TIME OFF? The answer to this will depend on company policies, as well as any applicable federal, state, or local laws.

- WHAT IF I SUSPECT THAT A COWORKER IS SICK? Create a process for reporting concerns, and for rapid follow-up. Employers should expect complaints about a coworker who is coughing or sneezing, and determine how to handle those situations.

- I LIVE WITH AN AT-RISK FAMILY MEMBER. CAN I STAY HOME? Be prepared to address employees in a high-risk group, and concerns about bringing infection home to a vulnerable family member.

Determine how to best share information with employees. Options include posting updates on a company website, displaying posters with reminders, having managers hold virtual meetings based on talking points, and offering a phone number or contact person to call with questions.

CONCLUSION

Many employers have been awaiting their state's green light to reopen, but recognize the need to reopen in a manner that protects their employees and customers. No single plan for reopening can fit every business. Employers must to decide what measures are necessary based on their operations.

One set of rules might not even apply to all employees. Workers in a warehouse might not need the same measures as employees in customer-facing areas. When selecting measures, employers should consider the normal level of interaction between employees, or the level of interaction with customers, then determine what can be done to increase the distance and reduce the duration of contact.

Finally, most employees will have concerns, but not everyone will have the same level of concern. Some workers might be enthusiastic about coming back, while others may express fears. Employers should communicate regularly and provide reassurance. Employers will also need to make sure everyone follows the new policies, and enforce those policies consistently.

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