SAFER
Safe Actions For Employee Returns

External Considerations Return-to-Work Guidance

Raising awareness of the outside influences that can impact operations

As employers work to develop comprehensive continuation and/or return to work plans, changes in environmental and societal conditions outside of one's organizational control will need to be continually considered. As part of their efforts to address COVID-19 precautions, employers should develop protocols that can be adjusted based on external needs and shifts in policy, medical guidance and overall levels of community risk. These must be flexible and should be relative to city, county, state, and federal guidelines and levels of risk (e.g. infection growth rate, population density), which may vary greatly in organizations with large footprints. By doing this, organizations can set themselves up for continued safe operations without needing to create new protocols in response to external influences.

What is covered in this document:

Government Policies and Guidelines
Community Risk
Framework for Levels of COVID-19 Response Protocols

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National Safety Council

Government Policies and Guidelines

An important consideration for return to work protocols is adhering to federal, state and local jurisdiction requirements for business operations and public interactions. The range of federal, state and local jurisdiction mandates are wide. Therefore, employers should consider the following actions to keep up with changes in government policies related to COVID-19

☐ Identify primary sources for government policy information (e.g., **CDC**, **NIOSH**, **OSHA**, **National Governors Association**, etc.) as well as sources for relevant state and local jurisdictions (e.g., county, township or city level ordinances)

☐ Check for updates weekly to government policy primary sources in a variety of areas (e.g., workplace, operations, public transportation, schools, child care, food services) and assign responsibility for monitoring updates to a specific team or employee

☐ Develop an organizational policy for change management that describes how updates and changes are evaluated and communicated

☐ Consider the use of technology to assist in tracking policy information and regulatory changes and ensuring policy alignment and compliance

☐ Communicate any changes to organizational policy as a result of government mandates clearly and concisely to affected workers before and after policy change implementation; explain how these organizational changes are related to overall company protocol

☐ Establish a system for tracking any required reporting data to government bodies, landlords or property management, and key corporate stakeholders

Community Risk

Because the coronavirus pandemic does not affect all locations equally, it is vital for employers to consider the specific exposure risks for the communities into which employees are returning. Therefore, employers should consider the following actions to keep their return to work protocols appropriate and safe for the communities in which they are operating:

☐ Monitor the number of confirmed COVID-19 cases in the community to assess for potential interaction of employees with confirmed cases to determine exposure risk

☐ Share community risk analyses with employees and remind them of actions to take while out in the community

☐ Determine organizationally how community infection rates will impact self-assessment of exposure risk (e.g., very high, high, medium, low per **OSHA guidelines**) and put a plan in place for triggering any protocol changes based on local community spread

☐ Communicate any changes to organizational policy as a result of changes in community risk exposure clearly and concisely to affected workers before and after policy change

Framework for Levels of COVID-19 Response Protocols

To keep from creating new protocols from scratch in the face of changing external factors, employers should consider developing a phased or leveled approach to their return to work protocols. Although it is difficult to predict the state of the world in the future, employers who consider a leveled response will have a better chance at adapting to new restrictions efficiently with fewer pain points for their employees. Although the number of levels may vary for different organizations (e.g., full pandemic restrictions vs. limited pandemic restrictions vs. mission critical operations vs. new normal operations) the following aspects of the different levels should be considered.

- ☐ Identify who will determine the tolerable level of organization exposure risk for each level of operation and be prepared to shift levels based on risk exposure by performing a risk assessment

- ☐ Collaborate with insurance carrier to ensure that the organization's policy covers the types and levels of risk being assumed

- ☐ Involve public health or medical authorities to provide guidance on the determination of risk from a biological hazard perspective

- ☐ Clearly define the entrance and exit criteria that must be met to progress through each phase of reopening

- ☐ Keep in mind the employment, timekeeping, and HR policy considerations at each phase of reopening

- ☐ Consider health and safety protocols appropriate for each level of operation (e.g., PPE, cleaning protocols, vulnerable risk groups, physical distancing, hygiene requirements, entrance screening, trace testing, critical workers who can't socially distance)

- ☐ Consider travel and meeting protocols appropriate for each level of operation (e.g., virtual vs. in-person meetings, mission-critical travel vs. opportunistic travel, site visitors, vendors, delivery drivers)