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Safe Actions For Employee Returns



Physical Considerations Return-to-Work Guidance

Preparing the physical workplace for return to work

A major consideration every organization should evaluate before issuing a return-to-work order are the practices they have adopted to promote a safe physical environment for workers. Employers should develop procedures for building maintenance and care, maintaining physical distance, and mitigating risks for employees who need to perform work in public environments that are both inside and outside of the organization's control.

What is covered in this document:

- Buildings, Facilities and Operations
- Physical Distancing
- Public Workspace Risk Management



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Buildings, Facilities and Operations

Although many employers have had to carry on essential work operations in their facilities despite shelter-in-place restrictions, these businesses and others will have employees returning to physical environments that need to be adequately prepared for infection control and physical distancing practices. Employers should consider the following actions when preparing physical spaces for a return to work:

- Schedule a full **sanitization** of the facility and equipment prior to returning employees to work (consider there may be a required inspection audit or proof of full sanitization by local authorities before a facility may be allowed to re-open)
- Assess the space to determine the maximum capacity possible when occupants maintain the advised distance from each other (e.g., divide square footage by 36 for 6 feet physical distancing occupancy capacity); then monitor the number of people occupying that space to ensure the maximum is not exceeded
- Consider posting temporary occupancy limits on common spaces (e.g., conference rooms, training rooms, elevators, etc.)
- To reduce touch points, install motion-detection sensors in place of switches where possible and consider the use of robotics to conduct basic cleaning
- Conduct a formal assessment for determining areas (e.g., rooms, gathering areas, areas dedicated to critical or essential workers, etc.) that can be closed off that are not needed to do business, and then close access to them
- Classify worker exposure to SARS-CoV-2 (i.e., **OSHA's Occupational Risk Pyramid**) in order to determine and implement control measures
- Consider installing hands-free arm-pull or foot-operated door openers where possible and hold backs for fire doors that release with fire detection (e.g., magnetic) to reduce open/close needs
- Develop site cleaning guides and frequency (e.g., hourly, twice per day) that specifically address heavy usage areas (e.g., restrooms, elevators, onsite gyms/exercise rooms, elevator buttons, door handles), cleaning chemical inventories, secondary containment training and labeling and training for proper disinfection techniques (e.g., disinfecting incoming equipment for service centers and shared tools/workstations/equipment)
- Inspect core building infrastructure including HVAC, water systems, and plumbing to appropriately flush the systems and install new filters, etc.
- Review building water management program and implement 'clean out' and 'start up' procedures in order to remove biological matter build up and mitigate any Legionella risk associated with a dormant system
- Conducting a risk assessment/analysis of all new processes, procedures, policies and products as a result of COVID-19 changes and inventory, procure and store Personal Protective Equipment (PPE) needed based on worker risk exposure
- Train and post signage for proper PPE usage, identification (e.g., face shield for grinding operations versus plastic barrier for screening), etc.

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- Develop or modify process for procurement and storage of hazardous materials (e.g., hand sanitizer, cleaners, disinfectants) in accordance with relevant standards (e.g., National Fire Protection Association 30)
- Evaluate new work operations, employee circulation, and other physical distancing plans to ensure feasibility by expected degrees of physical handicap/mobility challenges
- Develop and deploy site pre-check assessments and readiness audits prior to reintroducing employees
- Provide resources to temporary workers in terms of training and safety and health protections, including providing PPE (see https://www.osha.gov/temp_workers)
- Establish protocols for proper disposal of face masks, gloves, and other disposable PPE worn during work shifts
- Establish protocols for proper cleaning and disinfection of PPE if it is able to be reused
- Develop, implement and monitor a training program to ensure employees wear PPE properly
- Develop a plan for the safe restart of site assets and equipment including restart procedures, equipment maintenance audits, and preparation checks

Physical Distancing

The potential risks inside of a workplace can be at least partially mitigated through physical distancing protocols. Employers should consider the following actions to promote and encourage appropriate physical distancing in the workplace:

- Recommend conducting formal risk assessments for determining the most reliable physical distancing recommendations (i.e., using the hierarchy to decide on controls), especially in high-risk or out of process activities
- Facilitate use of individual rather than collective transport to limit possible exposure
- Use visual cues and signage that encourage physical distancing
- Designate separate entrances and exits for buildings and rooms, if possible, and provide directional signage for traffic flow along with physical distancing reminders/cues (e.g., maintain six feet, one-way pedestrian traffic flow, floor markings)
- Arrange workspaces for appropriate physical distancing between desks/chairs/conference tables (e.g., use only alternate desks, remove chairs and tables)
- Document and display appropriate occupancy for rooms to allow for proper physical distancing given specific square footage
- Continuously monitor space use and density for different floors and/or heavily trafficked rooms (e.g., conference rooms)
- Support policy, training, signage, etc. with enforcement of physical distancing (e.g. verbal warning, corrective action, positive reinforcement of good suggestions and practices, etc.)
- Consider installing physical barriers like plastic sneeze guards between work spaces and reception areas that cannot conform to physical distancing guidelines

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- Designate increments of acceptable physical distance on floors where lines might form (e.g., entrance to building, restrooms, etc.)
- Identify physical bottlenecks where physical distancing is more difficult and implement plans for alleviating bottlenecks (e.g., restrooms, corridors, stairwells)
- Develop protocols for use of confined spaces like elevators (e.g., limit capacity to 2-3 people, guide employees on how to position themselves in elevators, etc.)
- Remove furniture in congregation-prone areas to discourage physical closeness (e.g., reception areas, waiting rooms, dining areas, etc.)
- Consider other factors for physical distancing, such as staggered shift operations, staggered meetings using audio/visual tools for communicating and staggered break times
- Find alternate ways to clock in
- Establish when **face coverings** need to be used or not (e.g., passing in the hallway versus having a conversation in the hallway) and consider policies for limiting interactions in hallways
- Consider designating additional break rooms and lunchrooms to limit worker density and allow proper physical distancing
- Consider using technologies to monitor and govern physical distancing throughout a physical location
- Stress the importance of practicing physical distancing while taking public transportation to and from work

Public Workspace Risk Management

In certain cases, employees may have to conduct work in a public environment or an environment outside the direct control of their organization. To mitigate risk to the employee, and to mitigate risk to the public, employers should consider the following actions:

- When possible, set an extended perimeter around a workspace to place adequate distance between the worker(s) and other individuals
- Ensure employee vehicles (owned by the employer) always have sufficient levels of necessary COVID-19-specific PPE (e.g., masks, gloves, etc.)
- Establish **procedures** for disinfecting shared fleet vehicles
- Provide training to all employees how to operate safely in public spaces or environments outside the direct control of the organization
- Advance communication with external sites to discuss and confirm that COVID-19 guidelines (e.g., physical distancing, etc.) are being followed to the best of the external site's ability
- When possible, advance communication as to whether individuals at the site have recently been confirmed positive
- Provide a method for employees to request additional PPE

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- Provide a method for employees to report unsafe behavior by fellow employees or exposure-related incidents (e.g. forced to be near an individual showing symptoms of an illness)
- Develop or determine policies where employees can refuse to work or what protocols are in place if an employee suspects a member of the public with whom they are required to interface shows symptoms of COVID-19 illness
- In lone worker scenarios, provide a direct line of communication with the company in case of sudden illness or emergency situations
- Implement policies to limit the number of workers needed to be present to carry out any tasks off of company-owned property