



MAXIMIZING COMPLIANCE | MITIGATING RISK

COVID-19 | BACK TO WORK BEST PRACTICES

Indiana employers are facing unprecedented challenges in responding to COVID-19 and its implications for their workplaces. Refer to the [Indiana State General Guidelines](#) for ALL businesses as well as the checklist below to guide you as you open.

The checklist below will assist in thinking through the issues most likely to need attention in the immediate future. Information, agency guidance, and potential responses to COVID-19 are changing rapidly.

1. COMMUNICATIONS & PLANNING

- Designate a COVID-19 task force or at least employee to focus on remaining up to date with information, and communicating it through the organization in a timely manner.
- Develop your own internal COVID-19 Preparedness Response Plan. (See SAMPLE TEMPLATE: Covid19 Prevention-Safety-Exposure-Response-Plan-Template (1))
- Disseminate, as appropriate, CDC, WHO, OSHA, and local health authority websites, including the below guidance from the CDC.

- Updated information on [Coronavirus Disease 2019 \(COVID-19\)](#).
- Interim Country Wide Guidance for Businesses and Employers: [Plan and Respond to Coronavirus Disease 2019](#).
- [Public Health Recommendations for Community-Related Exposure](#).
- Information regarding employee travel: [Traveler's Health](#).
- Adjust business operations and staffing levels in accordance with government ordered closures of non-essential businesses and "shelter in place" orders.
- Develop a written plan of action to implement if a worker becomes sick with COVID-19
Review or adopt telework policy, and evaluate workforce to determine which jobs can be performed remotely via telework and which cannot.
- Evaluate ability to provide technological support and access for significant numbers of employees performing remote work.
- Review or adopt emergency preparedness policy.
- Determine availability of company vacation and company statutory paid sick leave while employees remain out of work (quarantine or office closure); consider any needed flexibility
- Communicate with employees about safety precautions and procedures to follow in the event of various scenarios.

2. WORKPLACE SAFETY

- Review applicable OSHA (and state OSHA) and CDC standards, including OSHA's "[Guidance on Preparing Workplaces for COVID-19](#)"
- Encourage employees to check themselves for symptoms, and to stay home when not feeling well.



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- Conduct daily health assessments by utilizing a screening procedure for COVID19 symptoms for employees who are reporting for work. Examples include self-assessments before arrival in the workplace, screening questions, or taking temperatures with a **no-touch thermometer**.
- Educate employees regarding best practices for hygiene in the workplace.
- To the extent possible (and as required by state or local authorities), permit telework.
- To the extent possible, implement social distancing requirements for the workplace, and consider staggering shifts and other practices to lower the risk of contact/exposure, such as staggered workstations.
- Ensure a minimum of six feet between people, which may be accomplished in a number of ways. Examples include physical barriers such as sneeze guards, limiting capacity, altering shifts, line markings, using appointments whenever possible, and limiting close interactions with customers.
- If an employee was present at the job site within 48 hours of testing positive, employers should follow the [CDC's cleaning and disinfecting guidelines](#). Cleaning staff should clean and disinfect all areas used by the ill person, especially frequently touched surfaces.
- If it has been more than seven days since the person who is sick visited or used the facility, additional cleaning and disinfection procedures are not necessary.
- For electronics - such as tablets, touchscreens, keyboards, remote controls and ATMs - consider using wipeable covers. If there are no manufacturer's instructions for cleaning and disinfecting electronics, use alcohol-based wipes or sprays containing at least 60% alcohol and dry the surfaces thoroughly.
- Employers should develop policies for worker protection and provide training to all cleaning staff on-site before assigning cleaning tasks. This should include training in when to use PPE; what PPE is necessary; how to properly put it on, use it and take it off; and train them in how to dispose of PPE the right way.
- Ensure workers are trained on the hazards of the cleaning chemicals being used in the workplace per OSHA's Hazard Communication Standards.
- Comply with OSHA's standards on bloodborne pathogens, including proper disposal of regulated waste and PPE.
- Require employees to practice social distancing at work. This can include staying at least six feet apart, limiting the number of occupants in offices and/or elevators, requiring office doors to remain closed when occupied, closing lunch and break areas, and restricting occupancy and spacing.
- Staggered arrival and departure times and/or work hours.
- Closing certain stalls/urinals in the restroom to create adequate distance between individuals.
- Limit one person to a vehicle, if possible.
- Install high-efficiency filters and increase ventilation rates in the workplace.
- Designate one person to clock employees in and out of work, or to record their arrival and departure times if clocking in would otherwise require employees to be in close contact with each other or to touch the same equipment. Forbid the sharing of headsets, refrigerators, microwaves, computers, tools and other equipment.
- Prop open doors to reduce touching of handles.
- Install glass or plexiglass barriers where people have to meet to talk and exchange documents or materials, including at secretarial workstations and customer service desks.
- Limit use of any shared items - Badges, Clipboards, White Boards, etc.



- Perform routine environmental cleaning of office, including high-touch surfaces.
- Perform enhanced cleaning and disinfection if an employee is suspected or confirmed to have COVID-19.
- Take immediate steps to protect workers who are exposed to COVID-19 in the workplace.
- Consider providing masks, gloves, and other protective equipment.
- To the extent possible (and as required by state or local authorities), permit telework.
- To the extent possible, implement social distancing requirements for the workplace, and consider staggering shifts and other practices to lower the risk of contact/exposure.

3. LEAVE BENEFITS

- Assess sick leave and medical leave policies in light of new legislation, including the Families First Coronavirus Response Act (FFCRA) and any applicable Indiana paid sick leave laws.
- Consider revising leave policies to accommodate employees' potential need for leave due to quarantines, isolation orders, or school closures related to COVID-19.
- Track each employee's use of leave, including the duration and reasons for the leave.
- Keep in mind that leave taken under the FFCRA and under certain state sick leave laws are job-protected and employees should be reinstated to their prior positions once they return.

4. RESPONSE TO POTENTIAL EXPOSURE

- Consult guidance from state and local health departments.
- Encourage employees to self-report if they have been diagnosed with or exposed to COVID-19.
- Consider asking any employees who have been exposed to COVID-19 to work from home for the COVID-19 incubation period (currently 14 days from the date of exposure, according to the CDC).
- If an employee has been diagnosed with COVID-19:

- Ask the affected employee to identify all individuals (co-workers, contractors, customers, clients, vendors) who have worked in close proximity with the employee for the period beginning two days prior to the onset of symptoms to the present.
- Inform other employees of their possible exposure to COVID-19 in the workplace, but keep the identity of the infected individual confidential.
- If needed, consider implementing non-invasive screenings of employees (such as body temperature checks or symptom questionnaires) entering the workplace. Consult guidance from the EEOC and other federal, state, or local agencies regarding permissible medical inquiries in light of COVID-19.
- Monitor employee conduct and enforce anti-discrimination policies.

5. INDIVIDUAL QUARANTINE and RETURN TO WORK POLICIES

- If an employee is suspected or confirmed to have COVID-19, request self-quarantine or mandatory quarantine pursuant to CDC guidelines and any quarantine/isolation orders from federal, state, or local health authorities.
- Consider requiring medical clearance from a doctor before the employee returns to the workplace, but note that this may delay return because health care providers will be overwhelmed; consider instead requiring employees be completely symptom-free and past the incubation period before returning.
- Consult guidance from CDC and state and local health authorities before allowing the employee to return to work.