RETURNING TO WORK
8 STEPS TO KEEP EMPLOYEES SAFE
The impact of COVID-19 has been felt in Wisconsin and globally. The public health crisis created an economic crisis that required many businesses to reduce operations or shutdown entirely. As the state debates how to reopen the economy, it is important that steps are taken to protect the health and safety of Wisconsinites.

Businesses must show they are prepared to keep employees, customers and other guests safe. A new normal will exist when businesses are allowed to reopen, and it will be incumbent upon employers to take the necessary steps to minimize risk.

From updated policies to the potential need for personal protective equipment, businesses will face new challenges associated with combatting COVID-19. The virus does not show itself like other hazards, but there are steps all businesses can take to protect employees and others.

That is why Wisconsin Safety Council has put together these general guidelines and best practices for employers.

This Wisconsin Safety Council publication is meant to summarize guidance from the Occupational Safety and Health Administration (OSHA), National Institute for Occupational Safety and Health (NIOSH), Center for Disease Control (CDC), and National Safety Council (NSC) on how to safely open and operate businesses.

This guidance is constantly changing and this publication may not reflect those changes. Wisconsin Safety Council always encourages business owners, safety officers and all other persons to refer back to OSHA, NIOSH, CDC, NSC and relevant state authorities to ensure you are operating inside the bounds of the law and best practices to keep your businesses safe for employees and customers.
**STEP 1: IDENTIFY KEY MEMBERS OF THE RESTART TEAM**

Members of the company’s leadership team should take on key roles to help prepare for reopening. These roles include:

**EMPLOYEE ACCESS CONTROL LEAD**
Manages social distancing, shift changes, as well as visitors and contractors

**VIRUS PREVENTION AND PROTOCOLS LEAD**
Will develop protocols to ensure the wellness of all workers, and the overall pandemic preparedness and response plan.

**SANITATION AND DISINFECTION LEAD**
Will manage daily and periodic disinfection logistics.

**COMMUNICATION AND TRAINING LEAD**
Will manage all pandemic related communications, in accord with regional and global Communications and HR if applicable.

**PERSONAL PROTECTIVE EQUIPMENT (PPE) AND MATERIALS LEAD**
Will secure all necessary supplies to implement and sustain the site pandemic preparedness & response plan, including direct procurement by the plant.

This team should take the lead in developing the facility’s specific Basic Infection Protection Measures. The measures should be site specific and could differ if the company has multiple facilities. Protection measures should include, but are not limited to:

- Handwashing facilities and procedures/posters.
- Policies that encourage workers to stay home if they are sick.
- Policies that encourage respiratory etiquette, including covering coughs and sneezes.
- Process to provide customers and the public with tissues and trash receptacles.
- Establish policies and practices, such as flexible worksites (e.g., telecommuting) and flexible work hours (e.g., staggered shifts), to increase the physical distance among employees and between employees and others to comply with social distancing strategies.
- Prevent or discourage workers from using other workers’ phones, desks, offices, or other work tools and equipment, when possible.

- Policies that maintain regular housekeeping practices, including routine cleaning and disinfecting of surfaces, equipment and other elements of the work environment. When choosing cleaning chemicals, employers should consult information on Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens. Products with EPA-approved emerging viral pathogens claims are expected to be effective against SARS-CoV-2 based on data for harder to kill viruses. Follow the manufacturer’s instructions for use of all cleaning and disinfection products (e.g., concentration, application method and contact time, PPE).
STEP 2: 
DEVELOP A POLICY FOR IDENTIFYING & ISOLATING SICK PEOPLE

In the event an employee develops COVID-19 or related symptoms, the employer should have a policy in place to help protect coworkers and others who are in the facility. The policy should include:

✓ Taking temperatures with no-touch thermometers as recommended by EEOC and CDC.

When taking temperatures, any recorded data becomes an official health record and is subject to the recordkeeping requirements of OSHA. Employers can develop a temperature scanning process that does not involve recording the information.

✓ Developing a procedure for employees to self-monitor for symptoms and report immediately if they develop signs/symptoms of being sick.

✓ Sending sick employees home immediately to avoid further exposure within the workplace.

✓ If needed, securing an area or room as an isolation room for potentially sick or sick employees.

✓ Additional information on screenings and protocols can be found at https://www.cdc.gov/coronavirus/2019-ncov/community/general-business-faq.html.

STEP 3: 
OBTAIN NECESSARY SUPPLY OF PPE & CLEANING MATERIALS

It is essential that a company secure necessary PPE and cleaning materials before restarting operations. These products will be critical to keeping workers, customers and the public safe. Since sourcing these materials can be difficult at this time, it is important that enough of these supplies are obtained prior to reopening.

A 30-day supply of the following items are recommended:

✓ Disposable Surgical Masks
✓ Nitrile Gloves
✓ Infrared Thermometers (1 thermometer for every 100 employees)
✓ Disinfectant Sprays/Wipes
✓ Hand Sanitizer/Hand Soap/Paper Towels
✓ Safety Glasses and Face Shields
✓ Disinfectant and Cleaning Solutions
STEP 3:
OBTAIN NECESSARY SUPPLY OF PPE & CLEANING MATERIALS

The COVID-19 virus and other infections can live on surfaces for extended periods, so it is important to clean and disinfect a company’s facility and/or building prior to opening and consistently after opening. It is recommended that employers implement following guidelines:

- Clean and disinfect plant thoroughly before opening
- Change HVAC filters before opening
- Once open, maintain a regular cleaning schedule (several times per shift) of high-touch surfaces
- Deep clean entire plant when an active employee tests positive for COVID-19.

As a best practice, deep cleaning should be performed when there is a suspected case of COVID-19 and while waiting on test results.

STEP 4:
CLEAN & DISINFECT FACILITIES

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- Clean and disinfect plant thoroughly before opening
- Change HVAC filters before opening
- Once open, maintain a regular cleaning schedule (several times per shift) of high-touch surfaces
- Deep clean entire plant when an active employee tests positive for COVID-19.

As a best practice, deep cleaning should be performed when there is a suspected case of COVID-19 and while waiting on test results.

STEP 5:
DETERMINE RISK OF COVID-19 EXPOSURE

It is important to know that different types of businesses and different types of occupations come with different levels of occupational risk of COVID-19 exposure. To best prepare for reopening any company, and employer should determine the risk level for employees. Depending on the type of operations, a business may have more than one risk category.

OSHA designates four risk categories:

**VERY HIGH EXPOSURE RISK**
Those jobs with high potential for exposure to known or suspected sources of COVID-19 during specific medical, postmortem or laboratory procedures.

- Healthcare workers performing procedures on people known to be infected/exposed to COVID-19
- Healthcare or laboratory workers handling specimens that are known to be infected with COVID-19
- Morgue workers who perform autopsies and work with bodies of people known or suspected to have died from COVID-19

**HIGH EXPOSURE RISK**
Those jobs with high potential for exposure to known or suspected sources of COVID-19.

- Healthcare delivery and support staff
- Medical transport staff
- Mortuary workers preparing bodies for burial or cremation

**MEDIUM EXPOSURE RISK**
Those jobs that require frequent and/or close contact with (i.e., within 6 feet of) people who may be infected with SARS-CoV-2, but who are not known or suspected COVID-19 patients.

**LOW EXPOSURE RISK**
Those jobs that do not require contact with people known to be, or suspected of being, infected with SARS-CoV-2 nor frequent close contact with (i.e., within 6 feet of) the general public.
Once the level of risk has been determined for a company’s facility and its workers, it is important to take steps that reduce the risk of COVID-19 exposure. The steps taken to reduce risk throughout a company may differ depending on its operations.

Recommendations for each risk category are:

**ALL RISK CATEGORIES**

Basic Infection Prevention Measure and the policies for identifying and isolating sick people (see Step 1).

**LOW RISK**

- **Administrative controls:**
  - Collaborate with workers to designate effective means of communicating important COVID-19 information.

- **Engineering controls** have not been deemed necessary for low exposure risk jobs.

- **Additional PPE** is not recommended for low risk jobs unless otherwise specified in local or state orders.

**MEDIUM RISK**

- **Engineering Controls**
  - Install physical barriers, such as clear plastic sneeze guards, where feasible.

- **Administrative Controls**
  - Consider offering face masks to ill employees and customers to contain respiratory secretions until they are able to leave the workplace (i.e., for medical evaluation/care or to return home). In the event of a shortage of masks, a reusable face shield that can be decontaminated may be an acceptable method of protecting against droplet transmission. See CDC/NIOSH guidance for optimizing respirator supplies, which discusses the use of surgical masks, at: [www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy](http://www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy).

- **Personal Protective Equipment (PPE)**
  - When selecting PPE, consider factors such as function, fit, decontamination ability, disposal and cost. Sometimes, when PPE will have to be used repeatedly for a long period of time, a more expensive and durable type of PPE may be less expensive overall than disposable PPE.

  Each employer should select the combination of PPE that protects workers specific to their workplace.

  Workers with medium exposure risk may need to wear some combination of gloves, a gown, a face mask, and/or a face shield or goggles. PPE ensembles for workers in the medium exposure risk category will vary by work task, the results of the employer’s hazard assessment and the types of exposures workers have on the job.
STEP 6 (cont’d):
IMPLEMENT CONTROLS TO REDUCE RISK OF COVID-19 EXPOSURE

HIGH RISK AND VERY HIGH RISK

✅ Engineering Controls

Ensure appropriate air-handling systems are installed and maintained in healthcare facilities. See “Guidelines for Environmental Infection Control in Healthcare Facilities” for more recommendations on air handling systems at: www.cdc.gov/mmwr/preview/mmwrhtml/rr5210a1.htm.

CDC recommends that patients with known or suspected COVID-19 (i.e., person under investigation) should be placed in an airborne infection isolation room (AIIR), if available. Use isolation rooms when available for performing aerosol-generating procedures on patients with known or suspected COVID-19. For postmortem activities, use autopsy suites or other similar isolation facilities when performing aerosol-generating procedures on the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death. See the CDC postmortem guidance at: www.cdc.gov/coronavirus/2019-ncov/hcp/guidance-postmortem-specimens.html.

OSHA also provides guidance for postmortem activities on its COVID-19 webpage: www.osha.gov/covid-19.

Use special precautions associated with Biosafety Level 3 when handling specimens from known or suspected COVID-19 patients. For more information about biosafety levels, consult the U.S. Department of Health and Human Services (HHS) “Biosafety in Microbiological and Biomedical Laboratories” at www.cdc.gov/biosafety/publications/bmbl5.

✅ Safe Work Practices

Provide emergency responders and other essential personnel who may be exposed while working away from fixed facilities with alcohol-based hand rubs containing at least 60% alcohol for decontamination in the field.

✅ Personal Protective Equipment (PPE)

Most workers at high or very high exposure risk likely need to wear gloves, a gown, a face shield or goggles, and either a face mask or a respirator, depending on their job tasks and exposure risks. Those who work closely with (either in contact with or within 6 feet of) patients known to be, or suspected of being, infected with SARS-CoV-2, the virus that causes COVID-19, should wear respirators. In these instances, see OSHA’s COVID-19 webpage: www.osha.gov/covid-19.

PPE ensembles may vary, especially for workers in laboratories or morgue/mortuary facilities who may need additional protection against blood, body fluids, chemicals and other materials to which they may be exposed.

Additional PPE may include medical/surgical gowns, fluid-resistant coveralls, aprons, or other disposable or reusable protective clothing. Gowns should be large enough to cover the areas requiring protection. OSHA may also provide updated guidance for PPE use on its website: www.osha.gov/covid-19. NOTE: Workers who dispose of PPE and other infectious waste must also be trained and provided with appropriate PPE. The CDC webpage “Healthcare-associated Infections” (www.cdc.gov/hai) provides additional information on infection control in healthcare facilities.

members to immediately report symptoms of respiratory illness on arrival at the healthcare facility and use disposable face masks.

Consider offering enhanced medical monitoring of workers during COVID-19 outbreaks.

Provide all workers with job-specific education and training on preventing transmission of COVID-19, including initial and routine/refresher training.

Ensure that psychological and behavioral support is available to address employee stress.

✅ Administrative Controls

If working in a healthcare facility, follow existing guidelines and facility standards of practice for identifying and isolating infected individuals and for protecting workers.

Develop and implement policies that reduce exposure, such as cohorting (i.e., grouping) COVID-19 patients when single rooms are not available. Post signs requesting patients and family
STEP 7: PROVIDE TRAINING AT ALL LEVELS

The key to implementing these safety guidelines at all levels of a company require that all employees are fully trained and briefed on what is being done. This will minimize the overall risk for employees, customers and the guests by ensuring all employees understand the guidelines.

To do this, it is recommended that employers:

- Train salaried workers while working remotely to review and ensure their understanding of the plan.
- Host remote training for the company’s restart team and leads.
- Host training for HR and other departments on their plan responsibilities.
- Employee Training – Day 1 of restarting operations & ongoing for new hire/returnee orientation:
  - The company’s policies and procedure included in the Basic Infection Prevention Measures
  - COVID-19 signs & symptoms
  - Daily self-screening and what to do if employees think they may be sick
  - Isolation protocol for sick people
  - Social distancing in the workplace, including staggered shifts/breaks procedures
  - Personal hygiene – handwashing, covering coughs, etc.
  - COVID-19 disinfection procedures and housekeeping
  - Personal Protective Equipment – which PPE they are required to wear, maintenance and cleaning of PPE, proper disposal of PPE, proper use/donning/doffing
STEP 8: MONITOR THE SITUATION & ENSURE COMPLIANCE

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To do this, employers should be prepared to increase or decrease the response to COVID-19 if local, state or federal orders change. Additionally, businesses should be prepared to close operations if conditions worsen to the degree it is necessary or as required by local, state or federal law.

ADDITIONAL RESOURCES:
FOR MORE INFORMATION

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CDC RESOURCES
https://www.cdc.gov

OSHA RESOURCES
https://www.osha.gov/

WISCONSIN DEPARTMENT OF HEALTH SERVICES (DHS) COVID-19 RESOURCES
https://www.dhs.wisconsin.gov/covid-19
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