

SUBJECT: Draft Reopening Protocol

DATE: 5/5/20

The following was prepared by Business Council staff based on input from national and regional business organizations, individual member companies and individual safety and health experts, and in consideration of federal and state standards and guidance. It is intended to provide a template that can be used by businesses as they prepare for a facility reopening that have not yet developed their own COVID-19 protocol. As written, we believe it could apply to any business setting, including manufacturing that does not have a significant volume of customer/public interaction. The final version of this memo has been shared with the Cuomo administration, for their consideration as they finalize their reopening strategies for manufacturers and other sectors.

I welcome any comments or suggestions you have, as well as the opportunity to review any similar plans or protocols that you can share.

Thanks again for your input.

I can be reached at 518-339-5894 or ken.pokalsky@bcnys.org.

PLANNING/PREPARATION

- Identify Executive/Administrative team responsible for adopting and implementing the reopening plan.
- Prepare to maintain a copy of the reopening/operation plan, and documentation of key activities.
- Employer shall continuously monitor federal and state regulations and guidelines, and state and local COVID-19 case data, in order to inform and update operation and safety practices.
- Confirm that the location has or has access to an adequate supply of soap, disinfection, hand sanitizer, paper towels and tissues; face coverings and related equipment, with a target of 30 days' supply.

COMING TO WORK

- Employees who are not feeling well are expected to remain away from the workplace and contact their supervisor or HR department.

- Employees who consider themselves vulnerable to the COVID-19 virus (or share a household with someone considered vulnerable) due to age or underlying health condition should notify their supervisor prior to returning to the office. Human resources will engage in a constructive dialogue to determine what accommodation, if any, is available.
- By reporting to the office, employees will have attested that they do not present with recognized symptoms of COVID-19. These symptoms include a fever in excess of 100.4 degrees Fahrenheit, cough, sore throat, difficulty breathing and/or shortness of breath. Employees exhibiting such symptoms will be required to leave the work site. Also, an assessment and record of any incidental or close contact with other employees will be completed.
- Employers should create a single (or limited number) of entry points to the facility and maintain a daily attendance log of all workers and guests. Staggered shifts may be necessary to reduce density at entrances and exits and maintain social distancing.
- The employer may require written self-certification by employees of the absence of COVID-19 symptoms, or temperature screening.
- Employees are required to adhere to any public health-related quarantine or isolation requirement.
- Employees should notify their supervisor if they have tested positive for COVID-19, or have been exposed to a person who is known to have tested positive. Supervisors should relay such notices to human resources. The employer will also provide notice to co-workers and public health officials as required. In addition, the employer will conduct cleaning, sanitizing, etc. as required by public health guidance. In providing notice to coworkers of possible contact with employee having laboratory confirmed case of COVID-19, the employer shall maintain confidentiality and comply with the Americans with Disabilities Act.
- If an employee becomes sick during the day, they should be sent home immediately. Surfaces in their workplace should be cleaned and disinfected.
- When possible, employers should notify employees planning non-work travel outside of the country or a domestic COVID-19 hotspot that isolation may be required prior to return to work.
- Supervisor/manager training on the employer's COVID-19 response plan will be provided in advance of any facility reopening.
- Employees will receive training and written guidance on COVID-19 related workplace practices, in addition to any other training required by law, and provided a workplace contact for addressing questions and concerns, and will receive periodic communications by email, recorded message or workplace postings to reinforce these provisions and be encouraged to ask questions and provide feedback.

WORKSPACES

- Workplace will be cleaned and sanitized prior to any facility reopening and on a routine basis by employees or external cleaning service provider, using appropriate PPEs.
- Employer shall assure daily cleaning and sanitizing of all shared surfaces throughout the facility. This includes common spaces like bathrooms, conference rooms, lunchrooms, and high-contact surfaces (e.g., doorknobs and handrails), etc. Records documenting cleaning activity should be maintained.
- Employees will be provided with cleaners and sanitizers and associated PPE and are expected to maintain their work area periodically and whenever necessary due to use or conditions. All wastes including cleaning material should be disposed of in waste receptacles lined with disposable bags.
- Signage will remind employees of personal hygiene including hand washing, cough/sneeze etiquette, social distancing, use of PPEs, cleaning standards, etc.
- Workstations will be arranged to provide social distancing of 6 feet or physical partitions wherever possible.
- Face coverings will be provided, and employees are expected to wear them as directed by their supervisor consistent with state and federal guidelines. Face coverings are required in circumstances where social distancing cannot be consistently maintained. Employees who may have underlying health conditions that prohibit the use of face coverings should contact their supervisor or Human Resources. Employer will monitor personal masks brought in by employees to ensure they can be used safely and not trigger additional TBC OSHA requirements. The employer may require use of company-provided face protection, as appropriate. No masks rated N95 or higher to may be used without Supervisor approval.

WORKPLACE PRACTICES

- Employees may be required to work from home for an extended period, including after an allowable "reopening". Work at home practices may be lifted incrementally. Supervisors should identify those best positioned to continue to work from home.
- Signs will be posted, and markers laid on the floor to help employees maintain the suggested six-foot distancing between employees. Employees are expected to comply with those signs/markers.
- Access to break rooms will be limited to no more than a designated number of employees at any one time, targeting 50% or less of the rated occupancy.
- Employees should not congregate at other indoors or outdoors workplace locations, including entrances, exists, timeclocks, elevators, etc.. To extent necessary, employer should adopt a staggered work schedule to avoid crowds at entrances and exits.
- Employer will provide disposable plates, cups, etc. to discourage re-use of personal items.
- Microwaves, water cooler, coffee machines, refrigerators, vending machines and similar equipment must have surfaces cleaned and disinfected daily. Gatherings in conference/meeting rooms should be generally avoided, must be approved in advance by a supervisor, will be limited to no more

than 50% of room of rated occupancy, and social distancing will be required. Signs will be posted indicating maximum occupancy.

- Employees should keep to their assigned work cell location, when possible, and avoid using other employees space or equipment. Employees who commonly travel between departments or facilities as an essential function of their job should receive COVID-19 training specific to that role.
- Employees should use phone/email/virtual meetings instead of in-person meetings, even when at office, to the maximum extent possible.
- No non-essential work travel will be approved. The essential nature of travel will be determined using company guidelines.
- Employees that utilize company vehicles are not to share their vehicles with other employees. If such sharing is unavoidable, employees shall wear face coverings while in the vehicle. Employees using a shared work vehicle should clean and sanitize services after use.
- Material handling equipment such as fork trucks and pallet jacks will be disinfected daily.
- Management shall audit new and established business practices for the purpose of continuous improvement.

INTERACTING WITH CUSTOMERS/PUBLIC

- In general, non-employees will be prohibited from entering the workplace unless authorized by the site owner, manager or designated individual.
- Any non-employees episodically entering the workplace will be required to wear company-approved face coverings suitable for the type of work being conducted and work environment. This is consistent with Executive Order 202.16 which said, "For all essential businesses or entities, any employees who are present in the workplace shall be provided and shall wear face coverings when in direct contact with customers or members of the public."
- Non-employees with longer term presence in the workplace, including contractors and temporary workers, will be treated as employees under the company's COVID-19 plan, unless otherwise addressed in a written agreement with those workers' employer.
- Shipping receiving is limited to designated locations. Exterior signage is required to direct deliveries, visitors, etc.
- A written record of visitors to the site shall be maintained. Site-specific policies relative to COVID-19 should be communicated to visitors in advance or upon arrival. The employer shall adopt procedures for shipping/receiving materials. For material received on site that has been in transit and/or storage at the plant for more than 48 hours from last human contact, no specific precautions are required.

KEY STANDARDS, GUIDANCE AND RESOURCES

- NYS Executive Orders & Guidance – to be determined
- CDC cleaning and disinfection guidance.- <https://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html>
- EPA list of effective disinfectants - <https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>
- OSHA best practices - <https://www.osha.gov/Publications/OSHA3990.pdf>