



## COVID-19 SAFETY & HEALTH PROGRAM: PHASE 1 CHECKLIST (5/13/20)

| WHAT IS PHASE 1?   |   |
|--|---|
| Federal  | State   |
| Encouraging telework.<br>Closing common areas.<br>Returning to work in phases.<br>Minimizing non-essential travel.<br>Strongly considering special accommodations for “vulnerable” population.<br>Special recommendations for specific industries. | Limited re-openings for some businesses (per State & County proclamations). Work from home for others.<br>Social distancing. No large group events.<br>Face masks & other infection control practices.<br>Stay at home for people who feel ill.<br>Restricted air travel. |

**The following checklist has been prepared to assist employers in developing COVID-19 Safety & Health Programs. The checklist aggregates guidelines provided by the White House, Governor Ige and the County Mayors, the Centers for Disease Control and Prevention (CDC), the Occupational Safety & Health Administration (OSHA), the Equal Employment Opportunity Commission (EEOC), and the Hawaii Department of Health (HDOH). It is not legal or occupational hygiene/safety advice. Check with your legal counsel and safety/health advisor before finalizing your Safety & Health Program. Note the guidelines frequently change so you will need to update on a regular basis.**

### **STEP 1: DETERMINE SCOPE OF YOUR INFECTIOUS DISEASE PREPAREDNESS & RESPONSE PLAN**

#### **➤ Conduct A Risk Assessment.**

- For each worksite/office, division/department, and team/crew determine the following:
  - Can these employees continue teleworking or is it essential for these employees to work at your worksite/office?
  - Is there sufficient space at the worksite/office to have employees work/sit at least 6’ apart?
  - Is it necessary for the employees on the team/crew to be at work at the same time, or can they perform their duties using flex schedules, staggered work shifts, or alternating work days?
  - Do these employees have to meet face-to-face with coworkers, vendors, suppliers, business associates, customers, and/or members of the public?
  - Can services/ products be delivered remotely?
  - Do these employees have to handle materials, equipment or other items delivered by others?
  - Do these employees have to travel to other worksites on the island?
  - Do these employees have to travel to other islands for work?
  - Do these employees have to travel out-of-state for work?
  - Do these employees have to travel out-of-country for work?



- Classify worker exposure risk for each worksite/office, division/department, and team/crew using OSHA's risk exposure levels.
  - Lower Exposure Risk: Jobs that do not require contact with people known to be, or suspected of being, infected with COVID-19 nor frequent close contact with (i.e. within 6 feet of) the general public.
    - > Workers in this category have minimal occupational contact with the public and other coworkers.
  - Medium Exposure Risk: Jobs that require frequent and/or close contact with (i.e. within 6 feet of) people who may be infected with COVID-19, but who are not known or suspected COVID-19 patients.
    - > In areas without ongoing community transmission, workers in this risk group may have frequent contact with travelers who may return from locations with widespread COVID-19 transmission.
    - > In areas where there *is ongoing community transmission*, workers in this risk group may have contact with the general public (e.g. schools, high-population-density work environments, some high-volume retail settings).
  - High Exposure Risk: Jobs with high potential for exposure to known or suspected sources of COVID-19. Includes:
    - > Healthcare delivery and support staff (e.g. doctors, nurses, and other hospital staff who must enter patients' rooms) exposed to known or suspected COVID-19 patients.
    - > Medical transport workers (e.g. ambulance vehicle operators) moving known or suspected COVID-19 patients in enclosed vehicles.
    - > Mortuary workers involved in preparing (e.g. for burial or cremation) the bodies of people who are known to have, or suspected of having, COVID-19 at the time of their death.
  - Very High Exposure Risk: Jobs with high potential for exposure to known or suspected sources of COVID-19 during specific medial, postmortem, or laboratory procedures. Includes:
    - > Healthcare workers (e.g. doctors, nurses, dentists, paramedics, emergency medical technicians) performing aerosol-generating procedures (e.g. intubation, cough induction procedures, bronchoscopies, some dental procedures and exams, or invasive specimen collection) on known or suspected COVID-19 patients.
    - > Healthcare or laboratory personnel collecting or handling specimens from known or suspected COVID-19 patients (e.g. manipulating cultures from known or suspected COVID-19 patients).
    - > Morgue workers performing autopsies, which generally involve 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.



- **Decide whether to survey employees to determine who may be unavailable for work during COVID-19 pandemic.** Use language recommended by EEOC to identify:
  - Workers with individual risk factors (e.g. age 65 or older; chronic medical conditions, including respiratory and immunocompromising conditions; pregnancy);
  - Workers who need to care for child due to schools or day-care centers being closed;
  - Workers with household members who have individual risk factors and/or COVID-19; and
  - Workers who must use public transportation.

## **STEP 2: DEVELOP AND PREPARE PREVENTION MEASURES AND WORKPLACE CONTROLS**

- **For all employers.** Basic infection prevention measures include:
  - Frequent and thorough hand washing.
    - Provide workers, customers, and worksite visitors with a place to wash their hands (includes access to soap, running water, and paper towels).
    - Alternatively, provide alcohol-based hand rubs containing at least 60% alcohol.
  - Respiratory etiquette (i.e. covering coughs and sneezes).
    - Provide workers, customers, and worksite visitors with tissues and trash receptacles.
  - Discourage workers from using other workers' phones, desks, offices, or other work tools and equipment, whenever possible.
  - Maintain regular housekeeping practices, including:
    - Adopt routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment.
    - Use cleaning chemicals with Environmental Protection Agency (EPA)-approved disinfectant labels with claims against emerging viral pathogens. Follow manufacturer's instructions for use of cleaning and disinfection products (e.g. concentration, application method, contact time, and use of personal protective equipment (PPE) when applying).
  - Requiring workers to stay home if they are sick. (See Step 3 below.)
- **For lower exposure risk jobs.** Prevention measures include:
  - Ensuring social distancing while at work.
    - Rearrange offices, work stations, desks to provide 6' distance between workers.
    - Establish alternating days or extra shifts to reduce total number of employees at the worksite/office at given time to allow the employees to maintain distance from one another.
    - Allow teleworking for all non-essential workers (i.e. workers who do not need to report to worksite/office).
  - Written policy requiring workers, customers, and worksite visitors to use disposable or washable face masks on your premises and at your worksites.
    - Have a supply of disposable face masks available in case someone arrives without a mask.



- Replace face-to-face meetings with virtual communications.
- Discontinue non-essential travel.

➤ **For medium exposure risk jobs.** Prevention measures include:

- The measures listed above for **all employers and lower exposure risk jobs.**
- Installation of physical barriers, such as clear plastic sneeze guards, where feasible.
- Increasing ventilation in the work environment. Alternatively, installing high-efficiency air filters.
- Limit customers' and the public's access to the worksite.
  - Restrict access to only certain workplace areas.
  - Adopt strategies to minimize face-to-face contact (e.g. drive-through windows, phone-based communications, teleconferencing, video-conferencing).
- Consider whether more PPE, in addition to face masks, may be appropriate (e.g. gloves, a gown, a face shield, goggles).

➤ **For high or very high exposure risk jobs.** Prevention measures include:

- The measures listed above for **all employers, lower exposure risk jobs, and medium exposure risk jobs.**
- Installation of appropriate air-handling systems including specialized negative pressure ventilation in some settings (e.g. see guidelines for isolation rooms in healthcare settings and specialized autopsy suites).
- Provision of PPE including gloves, gowns, goggles, face shields, face masks, and appropriate respiratory protection.
  - National Institute for Occupational Safety and Health (NIOSH)-approved, N95 filtering facepiece respirators or better must be used. When disposable N95 filtering facepiece respirators are not available, consider using other respirators that provide greater protection and improve worker comfort.
  - Consider using PAPRs or SARs for any work operations or procedures likely to generate aerosols (e.g. cough induction procedures, some dental procedures, invasive specimen collection, blowing out pipettes, shaking or vortexing tubes, filling a syringe, centrifugation).
  - Use surgical N95 respirator when both respiratory protection and resistance to blood and body fluids is needed.
- Regular inspection, maintenance, and replacement of PPE as necessary.
  - Ensure proper removal, cleaning, storage or disposal of PPE to avoid contamination of self, others, or the environment.
- Ensure that psychological and behavioral support is available to address employee stress.



➤ **For workers in specific industries.**

- Check CDC/OSHA guidelines for engineering, administrative and workplace controls applicable to specific industries.
- Regularly check State and County emergency declarations for additional industry-specific requirements.

**STEP 3: DEVELOP POLICIES AND PROCEDURES FOR PROMPT IDENTIFICATION AND ISOLATION OF SICK PEOPLE, IF APPROPRIATE** (These policies and procedures should be administered by Human Resources.)

➤ **Develop policy and procedure for employees who call in sick or report feeling ill at work.**

- Create standardized questionnaire to use when asking employees if they are experiencing COVID-19 symptoms (e.g. fever, chills, cough, shortness of breath or difficulty breathing, sore throat, muscle pain, new loss of taste or smell).
  - Decide if you will measure employee's body temperature. Temperature readings > 100°F indicate a fever.
  - Record body temperature on questionnaire. (Remember: Some people with COVID-19 do not have a fever.)
- If employee calls in sick or reports to work feeling ill:
  - If employee is at work, immediately move employee to location with closable doors, to isolate employee away from others until he/she can be sent home.
    - > Provide employee mask (if he/she does not already have one).
    - > Restrict number of people entering the isolated area.
    - > Provide PPE to those assisting employee who is sick.
  - Use standardized questionnaire (above) to ask employees if they are experiencing COVID-19 symptoms
  - If employee reports he/she is experiencing multiple COVID-19 symptoms (particularly fever or chills and cough or sore throat):
    - > Send employee home if he/she is at work and encourage employee to contact his/her doctor
    - > Tell employee to stay home if he/she is experiencing COVID-19 symptoms and encourage employee to contact his/her doctor.
  - Close off areas visited by the ill person.
  - Follow Hawaii Department of Health protocols for COVID-19 exposure at worksite. See <https://health.hawaii.gov/coronavirusdisease2019/files/2020/05/What-to-Do-if-a-Person-at-Your-Worksite-has-COVID-19.pdf>
- Provide employee information about available leaves and benefits including:
  - Emergency Paid Sick Leave (available until 12/31/20)



- FMLA
  - Company paid leaves
  - Temporary disability insurance or worker's compensation insurance (if applicable)
  - Inform employee that he/she will need to provide written clearance from his/her doctor in order to return to work. If employee is having difficulty getting written clearance from his/her doctor, consider alternatives such as:
    - Asking employee to authorize doctor to speak to HR by phone to confirm that employee is able to return to work (HR should send confirming letter to doctor after call)
    - Allowing employee to telework until such time as he/she can obtain written clearance from his/her doctor to return to work
  - Maintain all information about employee's questionnaire responses, temperature reading, illness, leave and benefit requests as confidential medical record in compliance with ADA.
  - Do not disclose the identity of the ill employee. Federal and state law requires medical information about an employee be kept confidential.
- **Develop policy and procedure for handling new hires.**
- Decide whether conditional job offers made to applicants who report symptoms of COVID-19 will be withdrawn or their start dates delayed. (Policy should be uniformly and consistently applied to all applicants with conditional job offers.)
  - Use standardized questionnaire (see above) to question applicant about whether he/she is experiencing symptoms of COVID-19.
    - If applicant reports he/she is experiencing multiple COVID-19 symptoms (particularly fever or chills and cough or sore throat):
      - > Inform applicant whether offer is withdrawn or his/her start date is delayed (whichever is applicable).
      - > Send email or letter to applicant confirming withdrawal of offer or delay of start date (whichever is applicable).
      - > If policy is to delay start date, instruct applicant to contact HR when he/she has been cleared to work. Inform applicant that he/she will be required to provide written confirmation from doctor of fitness for duty.
    - Do not disclose the identity of the ill applicant. Federal and state law requires medical information about an applicant be kept confidential.
- **Develop policy and procedure for employees returning from travel during pandemic.**
- If an employee is scheduled to travel off-island on essential business:
    - Decide whether to permit employee to telework during quarantine period.
    - Provide memo to employee regarding 14-day self-quarantine mandated by State/County emergency declarations.



- If an employee requests to take a paid or unpaid leave of absence for personal reasons:
  - Ask employee whether he/she will be traveling off-island during his/her leave.
  - Decide whether to permit employee to telework during quarantine period.
  - Provide memo to employee regarding 14-day self-quarantine mandated by State/County emergency declaration.
  
- **Develop procedure for handling situation where employee reports being under quarantine due to possible exposure to COVID-19.**
  - Decide whether to permit employee to telework during quarantine period.
  - Provide memo to employee:
    - Encouraging them to self-monitor for signs and symptoms of COVID-19; and
    - Explaining policy on leaves, and providing applicable leave request forms.
  - Follow applicable leave policy.
  
- **If your company/organization is notified of a COVID-19 exposure at your worksite/office, follow the Hawaii Department of Health protocols for COVID-19 exposure at worksite. See [health.hawaii.gov/coronavirusdisease2019/files/2020/05/What-to-Do-if-a-Person-at-Your-Worksite-has-COVID-19.pdf](https://health.hawaii.gov/coronavirusdisease2019/files/2020/05/What-to-Do-if-a-Person-at-Your-Worksite-has-COVID-19.pdf).**
  - Follow OSHA guidance for recording cases of COVID-19. See <https://www.osha.gov/memos/2020-04-10/enforcement-guidance-recording-cases-coronavirus-disease-2019-covid-19>
  
- **Refer questions/requests for accommodation from “vulnerable” (i.e. at risk) employees, and employees caring for family members, to Human Resources. These situations should be processed through established procedures for ADA accommodation procedures and leave requests.**

#### **STEP 4: COMMUNICATE ABOUT WORKPLACE FLEXIBILITIES AND PROTECTIONS**

- **Prepare written summaries of the following policies and procedures:**
  - Infection prevention procedures
    - Handwashing
    - Masks and other PPE (applicable to your industry)
    - Respiratory etiquette
    - Use of equipment
    - Housekeeping practices
    - Stay at Home (when sick)
  - Social distancing procedures at work
    - Changes in work stations, installation of physical barriers (applicable to your industry)
    - Changes in work schedules (if applicable)



- Teleworking
- Teleconferences, video conferences and face-to-face meetings
- Customer and public access to premises
- Vendor and supplier access to premises
- Travel
  - Essential business travel
  - Non-essential business travel
  - Personal travel
- Procedures for employees calling in sick or feeling sick after reporting to work
- Procedures for employees under quarantine due to possible exposure to COVID-19
- Requests for accommodation and leaves of absence for COVID-related reasons
- Procedures for applicants and new hires
- Emergency communication plans
  - Procedures for employees reporting problems or concerns
  - Procedures for notifying employees at the worksite/office and employees who are teleworking about emergency situations
- **Prepare written notices of the safety & health practices applicable to your:**
  - Vendors, suppliers and other business associates
  - Clients/customers

## **STEP 5: IMPLEMENT WORKPLACE CONTROLS**

- **Purchase supplies and install equipment**
  - Cleaning supplies
  - PPE
  - Applicable infection control devices/equipment
- **Post notices throughout worksite/office/restrooms. (HDOH has posters in different languages.)** Include:
  - COVID-19 symptoms
  - Handwashing signs
  - Wearing of face masks (and other applicable PPE)
  - Respiratory etiquette
  - Staying at Home When you are Sick
- **Send written notices (see above) to vendors, suppliers, business associates, and clients/customers**





- **Distribute written policies (see above) to all employees**
  
- **Provide information and training to employees on:**
  - COVID-19 risk factors, symptoms, and protective behaviors;
  - Your Company's infection protection procedures;
  - Safety & health procedures applicable to your specific industry;
  - Proper use, donning and doffing of PPE; and
  - Proper use, cleaning and maintenance of special safety & health equipment for your specific industry.