Returning to Work Guidance for Public and Affordable Housing

As states begin to lift lockdown and shelter in place orders, many organizations are in the beginning phases of returning to work, at various capacity levels. Resuming business operations should be done in a manner that is in compliance with federal and state orders. Business operational decisions should be based on both the level of disease transmission in the community and your organization's readiness to protect the safety and health of your employees and customers.

Resuming normal or phased operations provides the opportunity for your organization to update your COVID-19 response plans. Organizations returning to work should focus on several key areas including preventing and/or reducing transmission among employees, maintaining healthy business operations, and maintaining a healthy work environment. Below are key items for organizations to consider as part of their reopening plans.

Click here for the full guidance issued by the Centers for Disease Control and Prevention (CDC).

Social Distancing. Develop a plan for how your organization will enforce social distancing protocols after returning to work. These should be consistent with state and local requirements. The CDC recommends the following strategies for businesses:

- Implement flexible worksites (e.g., telework) and flexible work hours (i.e. stagger shifts to limit the number of employees in the workplace at the same time).
- Modify or rearrange workspaces to increase physical space between employees.
- Use remote technology as often as possible to limit in-person communication.
- Adjust business practices to reduce in-person contact with customers. When this isn't feasible, maintain physical space between employees and customers (i.e. physical barriers such as partitions).
- Use signs, tape marks, or other visual cues such as decals or colored tape on the floor, placed 6 feet apart, to indicate where to stand when physical barriers are not possible.
- Close common areas and break rooms.
- Consider cancelling or postponing business related travel or events.
- Discourage handshaking.

Social distancing measures should also be outlined for maintenance and property management personnel. This includes adopting contactless rent collection and guidelines for entering residential units for maintenance related requests.

Enhanced Housekeeping. Organizations should enhance their cleaning procedures to disinfect frequently touched surfaces on a regular basis. Follow the [CDC Guidance for Cleaning and Disinfecting](#).

Personal Protective Equipment (PPE). A thorough hazard assessment should be conducted to determine if workplace hazards are present, or are likely to be present, and identify the type of controls and PPE needed for specific job duties. The Occupational Safety and Health Administration (OSHA) requires for employers to provide appropriate PPE to those employees who are considered a higher risk for exposure, as well as training employees on correct use of PPE.

The CDC also encourages workers to wear a cloth face covering at work even if the hazard assessment has determined that they do not require PPE. Keep in mind that cloth face masks are not considered PPE. They may prevent employees, including those who don't know they have the virus, from spreading it to others but may not protect the wearers from exposure to the virus. Remind employees that wearing a cloth face covering does not replace the need to practice social distancing.

Temperature Checks and COVID-19 Testing. The U.S. Equal Employment Opportunity Commission (EEOC) has issued guidance on screening employee's temperatures to identify those exhibiting a fever. The EEOC concluded that in light of the pandemic, employers may measure employees' body temperatures prior to entering the workplace. The tests used must be accurate and reliable, per the EEOC. Click [here](#) to read the full EEOC publication. Keep in mind that not all people with COVID-19 will have a fever, or display any other symptoms for that matter.

Separating Sick Employees. Establish protocols for addressing instances of employees exhibiting COVID-19 symptoms at work. Any employee experiencing these symptoms should be separated immediately and moved to a designated isolation area. Arrangements should be made for the employee to return home or to a local health center if necessary.

Guidelines should also be issued regarding an employee returning to work after experiencing COVID-19 symptoms. The CDC has issued updated guidance on what to do if you are sick; this can be accessed [here](#).

Healthy Work Environments. Provide employees with what they need to adequately wash their hands and cover their coughs and sneezes. This includes tissues, no touch trash cans, soap and water, hand sanitizer, etc. Minimize non-essential travel and consider resuming non-essential travel in accordance with state and local regulations. If an employee becomes sick while traveling, ensure they understand that they should notify their supervisor and stay home if they are sick, and seek medical help if necessary. Organizations are encouraged to use teleconferencing when feasible for work-related meetings and gatherings.

Flexible Sick Leave and Supportive Policies. Review your current sick leave policies and ensure that they are flexible and consistent with public health guidance. Sick leave policies should permit employees to stay home to care for a sick family member; they should also consider employees taking care of children due to school and childcare closures. Under the Americans with Disabilities Act (ADA), employers are permitted to require a doctor's note from employees to verify that they are healthy and able to return to work. However, be aware that healthcare provider offices and medical facilities may be very busy and not able to provide this documentation in a timely manner. Due to this, the CDC advises employers to not require a COVID-19 test result or a healthcare provider's note for employees who are sick to validate their illness, qualify for sick leave, or to return to work.

Be sure to communicate company policies in a clear and effective manner. If there have been any modifications to a policy, it is imperative that all employees are made aware of any changes that they may be impacted by.

Assess Essential Business Functions and Prepare for Spikes in Absenteeism. Be prepared to change your business practices to maintain critical operations. Identify alternate suppliers and prepare your organization for limited access to high demand resources or services. As the future of the virus is unknown at this point, it is best for your organization to plan for high rates of absenteeism. Cross-train employees to ensure that essential business functions can still operate even with a limited number of staff.

Contractors and Service Providers. To limit in-person interactions, asses the contractors and vendors your organization works with to identify those that are non-essential, and instruct them to not report to your facility until further notice. Work with vendors and contractors that are critical to your business operations to ensure they use the same level of precautionary measures and protocols for themselves as your organization requires of your own employees. For example, if employees are required to participate in daily temperature screenings, this should also extend to a contractor prior to entering your facility.

Modifications to Building Ventilation Systems. The CDC and American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) recommend the following activities relating to building ventilation systems:

- Increase ventilation rates
- Ensure ventilation systems operate properly and provide acceptable air quality for the current occupancy level for each space
- Increase outdoor air ventilation, using caution in highly polluted areas.
- Disable demand-controlled ventilation.

- Improve central air filtration to the MERV-13 or the highest compatible with the filter rack, and seal edges of the filter to limit bypass.
- Check filters to ensure they are within service life and appropriately installed.
- Keep systems running longer hours to enhance air exchanges in the building space.

Organizations across the country will face the challenge of resuming operations while still protecting the safety of their employees and the customers they serve over the next few months. It is recommended to monitor local emerging developments within your community and always heed the advice of local government and public health authorities. Please refer to the below resources for additional information and guidance.

Sources

- **American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE),** *Guidance for Building Operations During the COVID-19 Pandemic*
- **Centers for Disease Control and Prevention (CDC),** *Interim Guidance for Businesses and Employers Responding to Coronavirus Disease 2019 (COVID-19), May 2020*
- **Centers for Disease Control and Prevention (CDC),** *Reopening Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes*
- **Centers for Disease Control and Prevention (CDC),** *What to do if You are Sick*
- **Society for Human Resources Management (SHRM),** A Guide to Employee Temperature Checks
- **U.S. Equal Employment Opportunity Commission (EEOC),** *Pandemic Preparedness in the Workplace and the Americans with Disabilities Act*