SAFER
Safe Actions For Employee Returns

National Safety Council
SAFER Framework Summary

Background
The core objective of SAFER is establishing sustainable safe operations for employers and workers as they navigate what the world of work looks like as a result of the COVID-19 pandemic. Our short-term objectives are to:

- Aggregate and analyze current practice and guidance from the business and public health communities
- Develop and publish regularly updated data-driven guidance and recommendations for safe return to and continuation of work, both broadly and relative to specific risks, industries, or conditions as they emerge
- Provide employers the tools and solutions they need to take action in complicated and challenging times
- Investigate the topic areas and operations types representing the most pressing concerns for employers planning for return to work.

The below framework is suggested based on review of dozens of corporate and public health protocols, recommendations, and guidance resources (a full list of publicly-available material is provided at the end of this document). The framework represents a map of the key areas around which corporate and public policy leaders are taking action, as well as the operations types in play, and will be the basis from which SAFER will build its recommendations for a safe return to and continuation of work. This framework is open to modification based on the feedback of the SAFER Task Force, a consortium of Fortune 500 companies, leading safety organizations, and public health professionals and experts. A full list of Task Force members is included at the end of this document. A more detailed description and list of considerations related to each of these topic areas follows.

Disclaimer: Nothing in any NSC SAFER document creates any legal obligation or should be seen as establishing any basis for liability.
Areas of Clarity and Challenge

It is important to note that not all topic areas for returning to a safe workplace within the framework are created equally. Some topic areas have clearer, more widely accepted guidance available, while others are more complex in scope or require information or solutions not yet available. Although much of the guidance presented in this document has universal applicability, regional or local public policy may constrain wholesale implementation across all sites of an organization.

Examples of areas of clarity include guidance around physical distancing, need for widespread testing and contact tracing, and usage of face coverings and other personal protective equipment. Examples of areas of challenge include supply and authenticity of personal protective equipment and cleaning supplies, infrastructure and capacity for regular testing and certain medical aspects related to the pandemic itself (e.g. disinfection, immunity, etc.). Although the SAFER Framework does not yet address which topic areas are more established in terms of accepted guidance and which areas are still awaiting further clarity, the SAFER Task Force is expected to discuss and act on these issues as appropriate.
Next Steps

It is anticipated that the SAFER Task Force will review and make suggested changes and additions to the framework over the course of its first few weeks of operation. Concurrently and in conjunction with the SAFER Task Force, the National Safety Council SAFER research team will update the overall framework while conducting deeper investigation into each topic area, synthesizing existing and emerging guidance, strategy and tactics. This work would result in a more concrete framework as well as specific, actionable playbooks within each topic area. Additional outputs will include detailed issue papers on key topics like workplace coronavirus testing, contact tracing, PPE/supply chain issues, physical building redesign, mental health, and transportation concerns. It is the intent of the National Safety Council to have these deliverables available on a rolling basis as soon as feasible.

*Note that this document as well as more specific playbooks will include exploration of/guidance on legal, labor, and other considerations within each topic area.*

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Physical Considerations

Prep[aring the physical workplace for return to work]

A major consideration every organization should evaluate before issuing a return-to-work order are the practices they have adopted to promote a safe physical environment for workers. Employers should develop procedures for building maintenance and care, maintaining physical distance, and mitigating risks for employees who need to perform work in public environments that are outside of the organization’s control.

Buildings, Facilities and Operations

Although many employers have had to carry on essential work operations in their facilities despite shelter-in-place restrictions, these businesses and others will have employees returning to physical environments that need to be adequately prepared for infection control and physical distancing practices. Employers should consider the following actions when preparing physical spaces for a return to work:

- Schedule a full sanitization of the facility and equipment prior to returning employees to work (consider there may be a required inspection audit or proof of full sanitization by local authorities before a facility may be allowed to re-open)
- Assess the space to determine the maximum capacity possible when occupants maintain the advised distance from each other (e.g., divide square footage by 36 for 6 feet physical distancing occupancy capacity); then monitor the number of people occupying that space to ensure the maximum is not exceeded
- Consider posting temporary occupancy limits on common spaces (e.g., conference rooms, training rooms, elevators, etc.)
- To reduce touch points, install motion-detection sensors in place of switches where possible and consider the use of robotics to conduct basic cleaning
- Conduct a formal assessment for determining areas (e.g., rooms, gathering areas, areas dedicated to critical or essential workers, etc.) that can be closed off that are not needed to do business, and then close access to them
- Classify worker exposure to SARS-CoV-2 (i.e., OSHA’s Occupational Risk Pyramid) in order to determine and implement control measures
- Consider installing hands-free arm-pull or foot-operated door openers where possible and hold backs for fire doors that release with fire detection (e.g., magnetic) to reduce open/close needs
☐ Develop site cleaning guides and frequency (e.g., hourly, twice per day) that specifically address heavy usage areas (e.g., restrooms, elevators, onsite gyms/exercise rooms, elevator buttons, door handles), cleaning chemical inventories, secondary containment training and labeling and training for proper disinfection techniques (e.g., disinfecting incoming equipment for service centers and shared tools/workstations/equipment)

☐ Inspect core building infrastructure including HVAC, water systems, and plumbing to appropriately flush the systems and install new filters, etc.

☐ Review building water management program and implement 'clean out' and 'start up' procedures in order to remove biological matter build up and mitigate any Legionella risk associated with a dormant system

☐ Conducting a risk assessment/analysis of all new processes, procedures, policies and products as a result of COVID-19 changes and inventory, procure and store Personal Protective Equipment (PPE) needed based on worker risk exposure

☐ Train and post signage for proper PPE usage, identification (e.g., face shield for grinding operations versus plastic barrier for screening), etc.

☐ Develop or modify process for procurement and storage of hazardous materials (e.g., hand sanitizer, cleaners, disinfectants) in accordance with relevant standards (e.g., National Fire Protection Association 30)

☐ Evaluate new work operations, employee circulation, and other physical distancing plans to ensure feasibility by expected degrees of physical handicap/mobility challenges

☐ Develop and deploy site pre-check assessments and readiness audits prior to reintroducing employees

☐ Provide resources to temporary workers in terms of training and safety and health protections, including providing PPE (see https://www.osha.gov/temp_workers)

☐ Establish protocols for proper disposal of face masks, gloves, and other disposable PPE worn during work shifts

☐ Establish protocols for proper cleaning and disinfection of PPE if it is able to be reused

☐ Develop, implement and monitor a training program to ensure employees wear PPE properly

☐ Develop a plan for the safe restart of site assets and equipment including restart procedures, equipment maintenance audits, and preparation checks
Physical Distancing

The potential risks inside of a workplace can be at least partially mitigated through physical distancing protocols. Employers should consider the following actions to promote and encourage appropriate physical distancing in the workplace:

- Recommend conducting formal risk assessments for determining the most reliable physical distancing recommendations (i.e., using the hierarchy to decide on controls), especially in high-risk or out of process activities.
- Facilitate use of individual rather than collective transport to limit possible exposure.
- Use visual cues and signage that encourage physical distancing.
- Designate separate entrances and exits for buildings and rooms, if possible, and provide directional signage for traffic flow along with physical distancing reminders/cues (e.g., maintain six feet, one-way pedestrian traffic flow, floor markings).
- Arrange workspaces for appropriate physical distancing between desks/chairs/conference tables (e.g., use only alternate desks, remove chairs and tables).
- Document and display appropriate occupancy for rooms to allow for proper physical distancing given specific square footage.
- Continuously monitor space use and density for different floors and/or heavily trafficked rooms (e.g., conference rooms).
- Support policy, training, signage, etc. with enforcement of physical distancing (e.g., verbal warning, corrective action, positive reinforcement of good suggestions and practices, etc.).
- Consider installing physical barriers like plastic sneeze guards between work spaces and reception areas that cannot conform to physical distancing guidelines.
- Designate increments of acceptable physical distance on floors where lines might form (e.g., entrance to building, restrooms, etc.).
- Identify physical bottlenecks where physical distancing is more difficult and implement plans for alleviating bottlenecks (e.g., restrooms, corridors, stairwells).
- Develop protocols for use of confined spaces like elevators (e.g., limit capacity to 2-3 people, guide employees on how to position themselves in elevators, etc.).
- Remove furniture in congregation-prone areas to discourage physical closeness (e.g., reception areas, waiting rooms, dining areas, etc.).
Consider other factors for physical distancing, such as staggered shift operations, staggered meetings using audio/visual tools for communicating and staggered break times

- Find alternate ways to clock in
- Establish when face coverings need to be used or not (e.g., passing in the hallway versus having a conversation in the hallway) and consider policies for limiting interactions in hallways
- Consider designating additional break rooms and lunchrooms to limit worker density and allow proper physical distancing
- Consider using technologies to monitor and govern physical distancing throughout a physical location
- Stress the importance of practicing physical distancing while taking public transportation to and from work

Public Workspace Risk Management

In certain cases, employees may have to conduct work in a public environment or an environment outside the direct control of their organization. To mitigate risk to the employee, and to mitigate risk to the public, employers should consider the following actions:

- When possible, set an extended perimeter around a workspace to place adequate distance between the worker(s) and other individuals
- Ensure employee vehicles (owned by the employer) always have sufficient levels of necessary COVID-19-specific PPE (e.g., masks, gloves, etc.)
- Establish procedures for disinfecting shared fleet vehicles
- Provide training to all employees how to operate safely in public spaces or environments outside the direct control of the organization
- Advance communication with external sites to discuss and confirm that COVID-19 guidelines (e.g., physical distancing, etc.) are being followed to the best of the external site’s ability
- When possible, advance communication as to whether individuals at the site have recently been confirmed positive
- Provide a method for employees to request additional PPE
- Provide a method for employees to report unsafe behavior by fellow employees or exposure-related incidents (e.g. forced to be near an individual showing symptoms of an illness)
☐ Develop or determine policies where employees can refuse to work or what protocols are in place if an employee suspects a member of the public with whom they are required to interface shows symptoms of COVID-19 illness

☐ In lone worker scenarios, provide a direct line of communication with the company in case of sudden illness or emergency situations

☐ Implement policies to limit the number of workers needed to be present to carry out any tasks off of company-owned property
Medical Health Considerations

Protecting the health of workers before and after returning to the workplace

Prioritizing the physical health of workers as they return to the workplace is key to protecting their physical safety. Employers should develop procedures for monitoring and promoting the medical health of the workforce, ensuring appropriate physical distancing, and encouraging overall good hygiene and infection control practices. For additional information visit the World Health Organization website at https://www.who.int/emergencies/diseases/novel-coronavirus-2019

Screening and Testing

For employees to return to a workplace, many organizations may institute screening procedures to clear employees, customers, and/or visitors for entry into a building or site. COVID-19 testing and screening is the best way to manage access effectively and safely, but rapid, widespread testing is not currently available. In the near term, temperature screening and self-assessments are the best options for assessing risk based on some of the most common symptoms of COVID-19. Although these screening methods are not foolproof measures to detect COVID-19, organizations should consider the following actions:

- Provide written communication and/or webinars to inform employees how, when and where screenings will be conducted and what will happen should an employee have an elevated temperature or provide an unwanted answer on a screening questionnaire

- Engage safety committees in assisting with creating guidelines that follow CDC recommendations (e.g., fever threshold of 100.4 degrees Fahrenheit, self-isolation of suspected or confirmed cases)

- Ensure mechanisms are in place to track and understand completion and engagement metrics around screening communications and training

- Create guidelines for supervisors and managers in the event of a suspected case and ensure the employee has transportation and a place in which to shelter/self-isolate

- Establish a process, including talking points, for communicating to employees who have been in contact with a symptomatic employee (e.g., what steps occur as a result, self-quarantine, area closed for deep cleaning, etc.) and create a list of common FAQs to help anticipate the answers

- Communicate exposure information and screening results with third-party employers, such as staffing companies providing temporary workers, in a timely manner
Refer to guidance to conduct needed public-health oriented measures (e.g., temperature checks) while also following Health Insurance Portability and Accountability Act (HIPAA) regulations for health data/information

Develop self-screening procedures for a dispersed workforce that reports to job sites, but not a company central location, and a process to effectively manage the self-screening procedures

Consider incorporating questions about symptoms along with temperature checks, and consider utilizing smartphone apps for employees to answer these questions prior to coming to work

Implement signage and other hazard controls in entrance screening cueing areas (ensure that cue is protected from adjacent vehicle traffic)

For employers who have visitors or customers, clearly define protocols for who will be screened and how. Define how employees will be protected if there are visitors and customers who will not be screened.

Tracking and Tracing

In the event that an employee registers a fever, tests positive for COVID-19, provides an unwanted answer on a self-assessment and/or exhibits symptoms related to COVID-19, employers need to be ready to respond and should consider the following actions to address medical concerns:

- Develop, communicate and train employees on entrance screening protocol including temperature checks and response protocol for suspected cases while following EEOC guidelines for HIPAA compliance
- Maximize use of technology that enables reliable temperature measurement and monitoring with minimal operator intervention or that work as a standalone hands-free self-service system
- Identify screeners and protocol for screener safety (e.g., appropriate PPE) and tracking of temperature checks or health assessments that identify best practices for efficient use of PPE.
- Develop COVID-19 medical reporting protocols for workers that develop symptoms
- Set up an isolation room and associated protocols including required equipment and procedures for entering/exiting and transportation guidelines
- Dispense PPE to symptomatic workers and direct them to isolate
- Document and track suspected positive cases for contact tracing and arrange transportation home for workers denied entry
Develop protocol for reporting positive test results to appropriate public health authorities as needed

Provide CDC-recommended self-isolation guidelines for workers who do not pass screening protocol, check-in with them regularly and develop protocol for post-quarantine return to work

Develop, communicate and train all employees on protocols in the event of a colleague exhibiting symptoms

Establish disposal procedures and necessary equipment for PPE that will no longer be utilized (e.g., spent face coverings, gloves, respirators)

Hygiene and Infection Control

Employers should strongly encourage their employees to practice good hygiene and infection control. They should also provide ample opportunity for workers to engage in proper hygiene practices. Specifically, employers should consider the following actions to promote workplace hygiene:

- Encourage workers to stay home if they feel sick and if an onset of symptoms develop while at work, report it immediately (communicate any changes to sick time policies, like previous requirements for a physician’s note when out more than a certain number of days)
- Encourage frequent hand washing and make hand sanitizer available in several locations, especially near common touchpoints
- Train and post signage about proper hand hygiene techniques in washrooms and break rooms
- Provide adequate amounts and locations of tissues, no-touch trash cans, anti-bacterial soap and alcohol-based hand antiseptics
- Consider installing hands-free arm-pull or foot-operated door openers in restrooms and for other heavily trafficked doors
- Encourage proper respiratory etiquette including covering coughs and sneezes with either a tissue or coughing into a sleeve (encourage wearing a face covering if deemed necessary and appropriate)
- Discourage the shared use of objects to the extent possible (e.g., phones, computers, office equipment and supplies, kitchen equipment and supplies) and when not possible, disinfect before/after use
- Provide training and information on proper disinfection techniques for shared spaces and objects (when unavoidable)
Consider extending cleaning services (or develop a cleaning checklist) to include shared company vehicles, where applicable.

- Consider strategically placing branded visual signage as a straightforward approach to remind people how to reduce their risk (i.e., with a focus on high-risk areas).

- Explain the difference between cleaning, disinfecting and sanitizing.

- Provide employees with disinfecting cleaning spray and cloth solutions to clean their own spaces such as desks, keyboards, phones, etc. on a regular basis.

- Advise staff of how to treat items brought into the clean workplace (e.g., personal possessions, food items, laptops, PPE, etc.).
Stress, Emotional & Mental Health Considerations

Providing employees the support needed to return to work

The safety and physical health of employees is top of mind for organizations as they look to reopen workplaces and have workforces return. Another set of considerations for employers must be the mental health and mental wellbeing of their employees. Employers must consider how they intend to allay the concerns, anxieties and uncertainty that workers may feel about their lives, jobs and the future of the organization when returning to work. Mental health distress and mental health conditions may continue to impact employees’ return to work and their ability to safely focus on the job at hand.

COVID-19 increases risk for employees experiencing mental health distress in several ways. Employees may have experienced high levels of stress associated with fears of themselves or family members being exposed to or infected by COVID-19. They may experience other mental health impacts stemming from stress caused by financial, employment, food, housing or child/family care instabilities. In general, trauma increases risk for development of mental health issues and substance use disorders.

Isolation is a particular risk factor. Extended social isolation increases risk for the development of mental health issues and substance use disorders, which can exacerbate pre-existing conditions, and increase the risk of depression, poor sleep quality, impaired cognitive functioning, as well as suicidal thoughts or relapse. Isolation is a well-documented risk factor for suicide, and connectedness is one of the best protective factors that helps to increase people’s resilience and buffer them against their mental health crisis.

Employers can expect that stress and mental health effects of COVID-19 may be prolonged or delayed. Each person will experience the stress and trauma of the COVID-19 pandemic differently. Some may not show signs of or experience mental health distress for weeks or months. This means that employers should build both short- and long-term responses to these mental health considerations, and ensure mental health continues to be prioritized after the immediate return-to-the-workplace scenarios.

Below are several factors for employers to consider regarding employee emotional and mental health when drafting overall plans for returning to work and full operations. Having employees know their employers are supporting them through these difficult times can make a significant difference for their mental and physical health. Buy-in and engagement from leadership, management, human resources, communications and employees themselves is critical for success.
Leadership, Supervisors and a Culture of Mental Health Safety

Leadership, supervisors and other managers have an essential role in addressing mental health impacts from COVID-19. Leading by example and building a culture of mental safety are critical. Building mental, emotional and psychological safety into every process (communications, trainings, etc.) builds resilience in the workforce.

Though employers may be working with limited resources and a limited workforce, prioritizing stress and mental health initiatives has immediate and long-term positive impacts. Poor mental health and stressors at the workplace can be a contributory factor to a range of physical illnesses like hypertension, diabetes and cardiovascular conditions, burnout, and financial impacts from increased absenteeism, negative impact on productivity and profits, as well as an increase in healthcare costs.

- Provide support and information about reducing social isolation while working remotely
- Provide support and information for employees anxious about leaving the relative safety of quarantine
- Provide training for leadership, supervisors, and employees on recognizing the signs of stress and other mental health emergencies and creating a culture of support and trust
- Ensure leadership and supervisors understand and validate the stress and other mental health distress issues an employee may be experiencing
- Increase connecting with employees as they continue to work remotely, continue to work on-site, or return to working on-site. Location of work (remote versus on-site) will affect the modality of checking in; however, frequent check-ins are important.
- Consider creating peer-led initiatives (e.g. slack channels, support groups). Provide training for peer leaders on moderator skills, handling sensitive topics, and more.
- Lead by example – demonstrate, encourage and support a work and home life balance while working remotely. Working from home or working remotely can challenge the balance of these structures; discuss with HR and supervisors how to be role models and support healthy habits while working from home
- Train supervisors and other leaders on how to address “hot topics” such as:
  - An employee tested positive for COVID-19 and coworkers are anxious about their return to the workforce
  - Strong reactions, fears and anxieties related to the COVID-19 pandemic (e.g. fears of contracting the virus, strong political opinions, opinions on re-opening, etc.)
Human Resources

Employers have a unique ability and responsibility to manage their relationship with benefit providers, such as Employee Assistance Programs (EAPs) and health insurance plans to ensure workers have access to the help and support they need. Human Resources teams and supervisors can help make this difference a reality.

When developing policies, consider a tiered approach. While members of the workforce may be experiencing mental health distress and not have a diagnosable mental health disorder, at least 20% of the working-age population has a diagnosed mental disorder and 5% of the population has a severe mental health disorder diagnosis. While it is not the responsibility of an employer or supervisor to diagnose mental health conditions, ensuring benefits and policies recognize that differing levels of care are needed is critical to ensure treatment.

Assess Internal Resources

- Evaluate if health benefits are adequate and conform to parity requirements under the law
- Assess if communication needs to be mailed or translated into different languages to be received and understood
- Evaluate if EAP resources are adequate; if not, address identified gaps either with EAP or with other resources (e.g. if your EAP does not offer virtual support options, identify some within the community or your organization’s healthcare plan to share with employees)
- Communicate the “how” of navigating healthcare benefits and EAP services – for employees in distress or employees who have not used these benefits before, not knowing how to navigate resources is a barrier to accessing them

Connecting Employees to Mental Health Resources

- Encourage EAPs and health insurance plans to be very active in promoting their telephone and online counseling services through various communications, campaigns, etc.
- Consider establishing a peer advocates group that involves front line workers, union representatives, and others to foster communication and reduce stigma about seeking help for stress, emotional, and mental health concerns
- Consider establishing a mental health taskforce with management representation from all functional areas. Provide training on how to spot the signs of mental health issues, approaches for handling or starting a conversation with an employee who is exhibiting
signs, and consider having an identifier worn or used by every member of the taskforce so employees can easily identify who they can speak with should they want to do so

☐ Send reminders about EAPs and how to get ahold of medical benefits administrators

**Communicate Your Resources**

☐ Communicate frequently to reassure employees they can get help for any kind of problem, and promote a culture that normalizes seeking support

☐ Consider using mobile and digital tools to provide company resources to employees

☐ Repeatedly share all the resources provided by your benefits providers and local community programs

☐ Provide easy links to national support and resource hotlines, including but not limited to:
  - [National Suicide Prevention Lifeline](#)
  - [Childhelp National Child Abuse Hotline](#)
  - [The National Domestic Violence Hotline](#)
  - [Eldercare Locator](#)
  - [National Sexual Assault Hotline](#)
  - [Find a Health Center](#)
  - [211.org (multilingual resource to connect to local crisis and emergency services)](#)
  - [Aunt Bertha Resource Database (multilingual resource to connect to reduced-cost social services)](#)
  - [SAMHSA National Helpline](#)
  - [Crisis Text Line | Text HOME To 741741 for free 24/7 Crisis Counseling](#)
  - [National Alliance on Mental Illness (NAMI): Find Support](#)

☐ Provide information about where to access self-screening assessments, for example:
  - [Mental Health America Self Screening Tests](#)

**Adjust and communicate appropriate HR policies and resources**

☐ Allow for flexible policies as schools restart, daycares reopen and schedules become reestablished

☐ Ensure the EAP offers financial counseling and support to help employees manage financial stress
Ensure the EAP offers counseling for substance misuse, fatigue, family stress and general mental health support; if counseling cannot be provided by the EAP, ensure policies allow for increased need for off-site counseling.

Allow for flexible policies as employees receive elective and routine medical care that may have been postponed due to the pandemic.

Allow for flexibility of employees to utilize paid time off to spend time with family or loved ones they were physically separated from during quarantine to help restore their connection with others, reduce stress, and regain a sense of normalcy.

Provide a confidential helpline or email address for employees to get help accessing personal resources and treatment privately.

Provide a confidential helpline for employees to raise job-related concerns anonymously.

Be ready to provide assistance or links to local/county/state/national resources on common employee concerns, such as applying for unemployment, food insecurity, childcare, etc.

Provide support for counseling for employees who test positive or develop COVID-19 or lose a loved one due to COVID-19.

Education and Awareness

An educated workforce can better protect themselves from the impacts of mental health and stress related to COVID-19. Consider building a robust formal and informal education and awareness plan that ensures employees are aware of these impacts, aware of workplace resources, and know they are supported. Communicating on these topics in small, easy to understand pieces of information is encouraged, as is sharing on multiple channels (e.g. posters, infographics, social media, brown bag lunch, email communications, communications from leadership, etc.).

Provide workers with opportunities to practice practical ways of reducing stress, such as mindfulness training, deep breathing exercises, yoga, and other forms of self-care.

Educate all leadership, supervisors and employees on:
  - Understanding the impacts of COVID-19 on stress, mental health and substance use
  - Recognizing the signs of impairment, substance misuse or mental health distress
  - How to engage in mental health first aid and suicide prevention efforts
  - How to refer employees to other resources and support (internally and externally; see above list for suggested national resources to share)
Provide formal and structured trainings as well as informal reputable resources employees can access on their own. Some examples of reliable and evidence-based free information can be found at:

- Mental Health America
- National Alliance on Mental Illness
- Psych Hub
- Other local organizations and institutions that provide community-specific resources

Other specific topics an employer may want to include over the next several months are:

- Mental health 101 – understanding mental health disorders and the brain
- Addressing the stigma surrounding mental health disorders
- The relationship between mental health and the increased risk for developing a co-occurring disorder, including physical health problems, substance use disorders and an increased risk of suicide

Other Considerations

For those working in essential or high-risk industries, employees may need elevated levels of support and services, both now and over the coming months. Other vulnerable populations (those with previously diagnosed mental health conditions or substance use disorders) may experience magnified or different impacts. COVID-19 impacts may also manifest as an increase in rates of substance use in the workforce. Remember that building mental, emotional and psychological safety into every process (communications, trainings, etc.) builds resilience in the workforce and that each employee will experience this differently.
Employment, Legal & Human Resources Considerations

Preparing the workforce to transition back to the workplace

A major consideration beyond the protocols to address the physical, medical, emotional and mental issues of reopening the workplace is the cumulative level of change that employees have experienced over weeks and months. Workers will undoubtedly have many questions and/or anxieties about transitioning back to a physical work environment, in terms of both their safety and health as well as disruption to what has become the “new normal” of sheltering in place and/or working from home. Employers need to proactively identify potential problems and solutions. Cross-functional partnership at the leadership level will help ensure the workforce is physically and psychologically prepared to return.

Policies and Procedures

Because of the pandemic, organizations likely allowed for flexibility in some work policies, which may require further adjustment upon return to a physical workspace. Actions surrounding these types of policies and procedures include the following:

- Confirm work status (e.g. active, working extended hours, working from home, on leave or furlough, change in hours, change in pay)
- Determine essential roles and protocols around a phased re-introduction of workers
- Review employment actions based on business need (e.g., furlough/layoff, hour/pay change)
- Review workers’ compensation procedures as related to COVID-19
- Assess employee travel policies, including who is eligible/required to travel, and ways to track if employees are visiting a region/city where there are outbreaks or risks of exposure
- Consider the implementation of reporting policies and mandatory 14-day quarantine for employees who travel for personal reasons (e.g. vacation) to high risk regions/countries
- Review work from home policies and provide instructions and tools for ergonomic home office setups
- Assess leave of absence and PTO policies
- Review infection detection and reporting procedures and methods for tracking
- Develop a plan to reintegrate employees who have recovered from COVID-19
Navigate the concerns for higher risk populations and consider how to incorporate high-risk employee profiles (e.g., over 60 years old, known medical conditions that are at higher risk) following EEOC guidance on protected classes.

Recommend or require employees to wear personal face coverings at work (check with applicable local and state requirements).

Review reasonable accommodation program guidelines.

Management of Change

Most employees will likely expect there to be changes in policies, protocols, and even the physical workspace following the pandemic shutdown. The following actions may be considered to reduce anxiety about returning to work and ensure that employees know what to expect, and may still be relevant to essential workplaces that did not fully shut down during the pandemic:

- Maintain timely and frequent communication with employees about policy and design changes.
- Cross-train workers to perform essential functions so the workplace can operate even if key workers are absent.
- Solicit open feedback on challenges and take action, as appropriate, while communicating back to employees the rationale as to why or why not action was taken.
- Convey in detail why certain protocol and design changes were adopted.
- Provide virtual work support to encourage continued virtual collaboration.
- Engage in virtual training to introduce employees to new protocols and patterns of behavior before they return to a physical workplace and ensure a method for acknowledgment that the training has been completed prior to returning to the workplace.
- Inform and train employees in any new organizational roles and responsibilities that have been instituted as precautionary measures against reinfection.
- Develop cross-training plans for potential fluctuation in the workforce (e.g., employees out for quarantine periods or due to leaves of absence) to ensure business continuity, and communicate appropriately to help employees understand their revised job responsibilities.
- Develop a process to effectively track employees who may be out for an extended period, and their tentative return dates for continuity purposes.
- Develop plans for crucial leadership continuity should leaders be impacted and out of office due to COVID-19.
☐ Create (or maintain) a web page for employees dedicated to COVID-19 (e.g., internal memos, pay codes, EAP/HR links, etc.) and keep it updated

☐ Notify employees when updates are made to a web page for communications on COVID-19, and highlight those changes
Communication Considerations

Ensuring effective and timely communication to facilitate return to work

Effective, timely and frequent communication is necessary to create the shared sense of safety and security among a workforce and ease the process of returning to work. In addition to including the details of the transition, a communications plan should anticipate employee concerns and questions. The right communication tactics can exhibit enhanced caring from leadership and help employees practice better awareness of their surroundings for physical distancing and more. Below are several factors for organizations to consider when developing a comprehensive change management communications strategy.

General Communication Considerations

- Identify the role of leadership in communication engagement and consider how messaging should be approved and delivered to employees
- Establish or update feedback mechanisms for responding to return to work communications so that employee concerns are appropriately and quickly addressed
- Create company approved talking points that supervisors can use; develop set of FAQ so that supervisors and managers are consistent in messaging
- Leverage multiple communication channels to reach the audience including phone, app-based, video (e.g., Skype, Zoom), verbal, digital displays, speaker systems, flyers, posters, email and postal mail

Personnel and Policy Changes

Because of the pandemic, organizations likely allowed for flexibility in many work policies, all of which will have to be reassessed and potentially revised and reissued upon return to a physical workspace. To guard against subsequent waves of the virus, and to be better prepared for similar events, organizations will likely create new roles and responsibilities for individuals. The following are some recommended actions for communicating this information:

- Describe why certain groups (e.g., departments, divisions, locations) or individuals were chosen to return to the workplace, if using a phased approach
- Define “vulnerable populations,” both for employees and family members of employees
- Explain the rationale behind the creation of new roles/positions within the organization for dealing with the impact of the coronavirus
☐ Outline the new responsibilities and emphasize existing responsibilities for existing roles/positions to ensure health and safety in the wake of the pandemic and how employees are expected to engage with the individuals who have assumed new roles

☐ Convey in detail why certain protocol and design changes were adopted (i.e., in response to risk assessment of new operations procedures)

☐ Explain the benefits of returning to a shared work environment (e.g., increased productivity and innovation, access to shared equipment and network, improved customer service, etc.)

☐ Clearly describe when and how and why organizational policies differ from public policies (e.g., region specific)

☐ Communicate to employees what remains the same in the organization (e.g., core values) and work to link messaging to established vision and mission statements

**Instructions for Arrival**

In order for employees to return to a workplace, many organizations may institute screening (through self-assessments, symptom checks and temperature checks) to clear employees for entry into a building or site, in addition to other new entrance policies. Communication should be explicit and clear so employees know what to expect when arriving back on site.

☐ Outline new entrance protocols for employees and visitors, including how, when and where screenings will take place (may need to be mailed to employees that do not have email addresses)

☐ Communicate to employers how medical privacy is maintained for any screening processes including communicating the process for employees who do not pass screening criteria and addressing possible stigma associated with not passing a screening protocol

☐ Consider using simple, branded, visual signage as a straightforward approach to remind people to reduce their risk and/or let visitors know what your organization is doing to help ensure the safety of employees and visitors

☐ Conduct demonstrations or training to introduce new behaviors to employees in anticipation of arrival back on site

☐ Provide and regularly remind employees of instructions for bringing work equipment back into the facility and sanitizing items

☐ Alert employees to changes in the work environment (e.g., availability of meeting rooms, occupancy restrictions, relocation of work stations, breakroom guidelines, etc. to allow for physical distancing)
☐ Describe how the facility or site was prepared and will be maintained for arrival of employees (e.g., cleaning and disinfecting)

☐ Tailor communication strategy for public-facing employees and determine the best way to communicate new policies with them
External Considerations

Raising awareness of the outside influences that can impact operations

As employers work to develop comprehensive continuation and/or return to work plans, changes in environmental and societal conditions outside of one’s organizational control will need to be continually considered. As part of their efforts to address COVID-19 precautions, employers should develop protocols that can be adjusted based on external needs and shifts in policy, medical guidance and overall levels of community risk. These must be flexible and should be relative to city, county, state, and federal guidelines and levels of risk (e.g. infection growth rate, population density), which may vary greatly in organizations with large footprints. By doing this, organizations can set themselves up for continued safe operations without needing to create new protocols in response to external influences.

Government Policies and Guidelines

An important consideration for return to work protocols is adhering to federal, state and local jurisdiction requirements for business operations and public interactions. The range of federal, state and local jurisdiction mandates are wide. Therefore, employers should consider the following actions to keep up with changes in government policies related to COVID-19

- Identify primary sources for government policy information (e.g., [CDC](https://www.cdc.gov), [NIOSH](https://www.cdc.gov/niosh), [OSHA](https://www.osha.gov), [National Governors Association](https://www.nationalgovernors.org), etc.) as well as sources for relevant state and local jurisdictions (e.g., county, township or city level ordinances)
- Check for updates weekly to government policy primary sources in a variety of areas (e.g., workplace, operations, public transportation, schools, child care, food services) and assign responsibility for monitoring updates to a specific team or employee
- Develop an organizational policy for change management that describes how updates and changes are evaluated and communicated
- Consider the use of technology to assist in tracking policy information and regulatory changes and ensuring policy alignment and compliance
- Communicate any changes to organizational policy as a result of government mandates clearly and concisely to affected workers before and after policy change implementation; explain how these organizational changes are related to overall company protocol
- Establish a system for tracking any required reporting data to government bodies, landlords or property management, and key corporate stakeholders
Community Risk

Because the coronavirus pandemic does not affect all locations equally, it is vital for employers to consider the specific exposure risks for the communities into which employees are returning. Therefore, employers should consider the following actions to keep their return to work protocols appropriate and safe for the communities in which they are operating:

- Monitor the number of confirmed COVID-19 cases in the community to assess for potential interaction of employees with confirmed cases to determine exposure risk.
- Share community risk analyses with employees and remind them of actions to take while out in the community.
- Determine organizationally how community infection rates will impact self-assessment of exposure risk (e.g., very high, high, medium, low per OSHA guidelines) and put a plan in place for triggering any protocol changes based on local community spread.
- Communicate any changes to organizational policy as a result of changes in community risk exposure clearly and concisely to affected workers before and after policy change.

Framework for Levels of COVID-19 Response Protocols

To keep from creating new protocols from scratch in the face of changing external factors, employers should consider developing a phased or leveled approach to their return to work protocols. Although it is difficult to predict the state of the world in the future, employers who consider a leveled response will have a better chance at adapting to new restrictions efficiently with fewer pain points for their employees. Although the number of levels may vary for different organizations (e.g., full pandemic restrictions vs. limited pandemic restrictions vs. mission critical operations vs. new normal operations) the following aspects of the different levels should be considered:

- Identify who will determine the tolerable level of organization exposure risk for each level of operation and be prepared to shift levels based on risk exposure by performing a risk assessment.
- Collaborate with insurance carrier to ensure that the organization’s policy covers the types and levels of risk being assumed.
- Involve public health or medical authorities to provide guidance on the determination of risk from a biological hazard perspective.
- Clearly define the entrance and exit criteria that must be met to progress through each phase of reopening.
Keep in mind the employment, timekeeping, and HR policy considerations at each phase of reopening.

Consider health and safety protocols appropriate for each level of operation (e.g., PPE, cleaning protocols, vulnerable risk groups, physical distancing, hygiene requirements, entrance screening, trace testing, critical workers who can’t socially distance).

Consider travel and meeting protocols appropriate for each level of operation (e.g., virtual vs. in-person meetings, mission-critical travel vs. opportunistic travel, site visitors, vendors, delivery drivers).
In addition to the publicly available sources listed below, the NSC SAFER research team reviewed over 30 COVID-19 response playbooks from organizations in power generation, utilities, construction, manufacturing, chemical, oil and gas, and transportation industries. Information will be continually updated as more resources and playbooks become available to the research team.


SAFER Task Force Members

AAA
ABSA International
AECOM
AIHA
Amazon
Ameren
American Board of Medical Specialties
American Chemistry Council
American Chemical Society
American College of Occupational & Environmental Medicine
American Contractors Insurance Group
American Petroleum Institute
American Red Cross
American Society of Safety Professionals
American Staffing Association
American Trucking Association
Associated General Contractors
Avetta
BAE Systems
BNSF
Board of Certified Safety Professionals
Boston Consulting Group
Captive Resources
Cementos Progreso
Charlotte-Mecklenburg Schools (NC)
Chemours
City of Chesapeake (VA)
City of Phoenix (AZ)
City of Sacramento (CA)
ContourGlobal
Cosette Pharmaceuticals
COVE: Center of Visual Expertise
Cummins
Cushman & Wakefield
Day & Zimmermann
Department of the Navy
Dow
DuPont
Edison Electric Institute
Electric Power Research Institute
Employee Assistance Professionals Association
ERM
FirstGroup
Grainger
HR Source
Industrial Scientific & Intelex Technologies
Infectious Diseases Society of America
International Safety Equipment Association
ISN
ISSA - Worldwide Cleaning Industry Association
Jacobs
The Kennedy Forum
Krause Bell Group
Manufacturers Alliance for Productivity and Innovation
McDonald’s
Michael Best & Friedrich LLP
NASA
National Association of Realtors
National Governors Association
NIOSH – CDC
NSC Chapter Network
NSC Divisions & Delegates
Nutrien
ORC HSE Strategies LLC
Owens Corning
Parsons
Premise Health
Psych Hub
Recreation Vehicle Industry Association
Retail Industry Leaders Association
Safe States Alliance
SIFZero
Sodexo
Tepa, LLC
Terex
thyssenkrupp
Uber
United Rentals
U.S. Chamber of Commerce
U.S. Steel
USG
VelocityEHS
Wabtec
Walgreens
Waymo
WorkCare
World Economic Forum