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Safe Actions For Employee Returns



Return-to-Work Guidance for School Administrators

What is covered in this document:

- General Operations Considerations
- Employee Wellbeing Considerations
- Detection and Screening Controls
- Environmental and Industrial Hygiene Controls
- Physical Distancing Controls
- Touch Surface and Object Transfer Controls
- Employee Transportation Considerations



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Background Information

One of the biggest areas of concern the COVID-19 pandemic has created is how to safely return teachers, staff and students to in-person instruction. As school districts across the country consider the process of resuming in-person instruction in the fall, they must weigh the many sources of sometimes conflicting information about how to do so safely. The NSC *SAFER* effort offers a unique workplace safety lens through which school administrators and leadership can consider and mitigate the in-person learning risks associated with the COVID-19 pandemic. Although the educational environment is certainly complex, there are nonetheless potential benefits of considering how to mitigate in-person learning risks from a workplace safety perspective, which is the purpose of the *SAFER* framework.

The core objective of *SAFER* is establishing sustainable safe operations for employers and workers as they navigate what the world of work looks like because of the COVID-19 pandemic. *SAFER* 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

SAFER recommendations are based on the review of dozens of corporate and public health protocols, recommendations and guidance resources to ascertain the best practices from employers who are currently working to mitigate COVID-19 risks in the workplace. The *SAFER* framework is continually modified and updated based on the feedback of the *SAFER* task force, a consortium of Fortune 500 companies, leading safety organizations, and public health professionals and experts.

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 parts of a school district.

General Operations Considerations

Every school administration should evaluate the practices they have adopted to promote a safe operating environment for employees and students prior to resuming in-person learning. Administrators should develop procedures for building maintenance and care, maintaining physical distance and mitigating risks for employees who need to perform work in these public environments. The following general operations guidelines should be considered when preparing for in-person learning:

- Cross-train employees to perform essential functions to maintain operations, even if key employees are absent
- Develop a process to effectively track employees who may be out for an extended period, and their tentative return dates for continuity purposes
- 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
- Determine essential employees and work functions
- Develop and deploy site pre-check assessments and readiness audits prior to reintroducing employees
- Provide written communication and/or webinars to inform employees how, when and where screenings will be conducted as well as what will happen should an employee have an elevated temperature or provide an unwanted answer on a screening questionnaire
- 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
- Create or modify training modules to include implemented public health and social measures (e.g., infection control practices, physical distancing, etc.)
- Identify a means to collect and distribute information on best practices in the workplace
- Establish appropriate ways to communicate possible workplace exposures to employees
- Develop a comprehensive communication plan to deliver information to relevant stakeholders
- Identify team leaders to gather employee comments and concerns
- Build in flexibility in your communications systems for targeted messaging
- Identify communication channels to relay safety practices (including to external stakeholders) and to inform employees of changes
- Identify which aspects of your safety practices are most critical to share with the community
- Determine best practices for regular information sharing with stakeholders
- Create signage in multiple languages
- Provide stakeholders with up to date resources with important contact information (e.g., staff medical officer, health department, health clinics, etc.)

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- Create plans in the event of a resurgence of cases or additional public health measures that restrict operations
- Review and determine equipment purchasing protocols
- Request an increase in supplies from manufacturers
- Identify alternative supply chains
- Provide a method for employees to report unsafe behaviors by fellow employees or exposure-related incidents (e.g. forced to be near an individual showing symptoms of an illness)
- Establish or update feedback mechanisms for responding to return to work communications so that employee concerns are appropriately and quickly addressed
- Regularly check for updates to government policy primary sources and assign responsibility for monitoring updates to a specific team or employee
- Develop or modify risk assessment methodology to determine, prioritize and respond to changes in risk level and effect on organizational exposure
- Establish two-way communication with employees working remotely or out sick
- Incorporate opportunities to receive questions or feedback on delivered communications
- Notify employees when updates are made to a web page for communications on COVID-19, and highlight those changes
- Identify the role of leadership in communication engagement and consider how messaging should be approved and delivered to employees
- Create administration/school approved talking points that supervisors can use; develop a set of FAQs so that administrators are consistent in messaging
- Define “vulnerable populations,” both for employees and family members of employees
- Explain the rationale behind the creation of new roles/positions within the schools 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
- Clearly describe when, how and why administration policies differ from public policies (e.g., region specific)
- Communicate to employees what remains the same in the district/school (e.g., core values) and work to link messaging to established vision and mission statements
- Develop an administrative policy for change management that describes how updates and changes are evaluated and communicated
- Collaborate with insurance carrier to ensure the administration’s policy covers the types and levels of risk being assumed
- Clearly define the entrance and exit criteria that must be met to progress through each phase of reopening

Employee Wellbeing Considerations

Another set of considerations for school administrators must be the mental health and mental wellbeing of their employees. Administrators must consider how they intend to allay the concerns, anxieties and uncertainty that employees may feel about their lives, jobs and their futures when returning to in-person learning. Mental health distress and mental health conditions may impact employees' ability to safely focus on the job at hand. Below are several factors for employers to consider regarding employee emotional and mental health when drafting overall plans for returning to in-person learning:

- Establish a mental health taskforce with representation from all functional areas and provide training for all leadership, supervisors and employees (signs of mental health issues, approaches for handling or starting a conversation, etc.)
- 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
- Allow employee flexibility to utilize paid time off to spend time with family or loved ones they were physically separated from during quarantine, restore connection with others, assist with education of children, reduce stress, regain a sense of normalcy, etc.
- Develop a plan to reintegrate employees who have recovered from COVID-19
- Navigate the concerns for higher risk populations or consider how to phase in high-risk employee profiles (e.g. over 65 years old, known medical conditions that are at higher risk) following EEOC guidance on protected classes
- Create and adapt paid sick-leave policies to suit recommended 14-day quarantine/isolation policies
- Encourage employees to stay home if sick
- Create plans on appropriate ways to guide your ill employees to seek medical care and testing or to contact the local health department
- Determine hazard pay criteria (for employees conducting self-cleaning, working close to others in confined spaces without masks, face shields, etc.)
- Communicate frequently to reassure employees they can get help for any kind of problem, and promote a culture that normalizes seeking support
- Provide easy links to national support hotlines
- Provide employees with education and opportunities to practice practical ways of reducing stress (mindfulness training, deep breathing, exercise, yoga, etc.)
- Develop emergency communications plans, including a forum for answering employees' concerns and internet-based communications, if feasible
- Encourage EAPs and health insurance plans to be very active in promoting their telephone and online counseling services through various communications, campaigns, etc.

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- Solicit open feedback on challenges and take action, as appropriate, while communicating back to the employee explaining the rationale as to why or why not action was taken
- Train supervisors and other leaders on how to address issues regarding an employee testing positive for COVID-19 and colleagues being anxious about their return to the workforce
- Train supervisors and other leaders on how to address 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.)
- 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 (e.g. virtual support options, financial counseling, impairment counseling) and address identified gaps either with EAP or with other resources (Identify options within the community or your administration's healthcare plan to share with employees)
- Communicate the "how" of navigating healthcare benefits and EAP services
- Establish a peer advocate group that involves front line employees, union representatives and others to foster communication and reduce stigma about seeking help for stress, emotional and mental health concerns
- 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](#)

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Detection and Screening Controls

For employees to return to in-person learning, many schools may institute screening procedures to clear employees, students and/or visitors for entry into a building. 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, school administrators should consider the following actions:

- Use technology to screen for elevated body temperatures among personnel (e.g., employees, visitors, vendors, students) entering a facility
- 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
- Develop COVID-19 medical reporting protocols for employees that develop symptoms
- Document and track suspected positive cases for contact tracing and arrange transportation home for employees denied entry
- 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
- 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
- Develop, communicate and train all employees on protocols in the event of a colleague exhibiting symptoms
- 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)
- Create guidelines for supervisors in the event of a suspected case and ensure the employee has transportation and a place in which to shelter/self-isolate
- Clearly define protocols for who will be screened (students, visitors, employees), and how employees will be protected if there are visitors who will not be screened
- Communicate exposure information and screening results with third-party employers, such as staffing companies providing temporary employees, in a timely manner
- Communicate to employees 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
- Incorporate questions about symptoms along with temperature checks, and utilize technology for employees to answer these questions prior to coming to work
- Dispense PPE to symptomatic employees and direct them to isolate

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Environmental and Industrial Hygiene Controls

School districts will have employees and students returning to physical environments that need to be adequately prepared for infection control and physical distancing practices. School administrators should consider the following actions when preparing physical spaces for a return to in-person learning:

- Inspect core building infrastructure including HVAC, water systems and plumbing to appropriately flush the systems and install new filters, etc.
- Consider the use of pressure differentials between two adjacent spaces to limit the transmission of airborne microorganisms
- Increase indoor fresh air percentage and/or recirculation rates
- Install high-efficiency air filters
- Increase ventilation rates in the facility
- Institute a rigorous housekeeping program to reduce dust levels in the facility
- Implement immediate cleaning and disinfection practices after persons suspected/confirmed to have COVID-19 have been in the facility
- Schedule a full sanitization of the facility and equipment prior to returning employees to work
- Develop site cleaning guides and frequency (e.g., hourly, twice per day) that specifically address heavy usage areas (e.g., restrooms, door handles), cleaning chemical inventories, secondary containment training and labeling and training for proper disinfection techniques
- Identify who will be responsible for the increased cleaning schedule (e.g., contractors, current employees)
- Provide ample time for the cleaning and disinfecting of facilities
- Ensure cleaning undergoes quality assurance checks
- 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)
- 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
- Establish procedures for disinfecting shared vehicles
- Ensure that those in charge of cleaning are provided with appropriate personal protective equipment

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Physical Distancing Controls

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

- Install physical barriers like plastic sneeze guards between work areas that cannot conform to physical distancing guidelines
- Remove furniture in congregation-prone areas to discourage physical closeness (e.g., reception areas, dining areas, etc.)
- Set up an isolation room and associated protocols including required equipment and procedures for entering/exiting and transportation guidelines
- When possible, set an extended perimeter around a workspace to place adequate distance between employees and/or students
- Use technologies to monitor and govern physical distancing throughout a physical location
- Use technology to assist in tracking policy information and regulatory changes and ensuring policy alignment and compliance
- Arrange workspaces for appropriate physical distancing (of at least 6 feet) between desks/chairs/conference tables (e.g., use only alternate desks, remove chairs and tables)
- Change operating hours
- Conduct meetings virtually, when possible
- Utilize masks or face coverings for employees in close-contact settings
- Utilize outdoor spaces to conduct business operations, when possible
- Implement physical distancing (of at least six feet) of participants at necessary gatherings
- Review seating arrangements to account for physical distancing (of at least six feet)
- Restrict number of non-essential visitors allowed into the facilities
- Conduct a formal assessment for determining areas (e.g., rooms, gathering areas, etc.) that are not needed to conduct business and close access to them
- 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)
- Establish virtual education options
- Change arrival and processing procedures for visitors and contractors to reduce the number of external personnel allowed in the facility at one time
- Encourage employees to stay home if they feel sick and report immediately an onset of symptoms developed while at work. Communicate any changes to sick time policies like previous requirements for a physician's note when out more than a certain number of days.

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- Enable employees to work from home, where possible
- Create or adapt work-from-home policies
- Establish protocols for proper disposal of face masks, gloves and other disposable PPE
- 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
- Stress the importance of practicing physical distancing while taking public transportation to and from work
- Use visual cues and signage that encourage physical distancing
- Support policy, training, signage, etc. with enforcement of physical distancing (e.g. verbal warning, corrective action, positive reinforcement of good suggestions and practices, etc.)
- Designate increments of acceptable physical distance on floors where lines might form (e.g., entrance to building, restrooms, etc.)
- Implement signage and other hazard controls in entrance screening cuing areas (ensure that cue is protected from adjacent vehicle traffic)
- Assess the space to determine the maximum capacity possible when occupants maintain the advised distance from each other, then monitor the number of people occupying that space to ensure the maximum is not exceeded
- Identify physical bottlenecks where physical distancing is more difficult and implement plans for alleviating bottlenecks (e.g., restrooms, corridors, stairwells)
- Stagger work/break/lunch/check-in/check-out schedules
- Design additional break rooms and lunchrooms to limit employee density and allow for proper physical distancing
- Establish rotations between work from home and onsite shifts
- Provide longer shifts to reduce the number of employee changes
- Limit meeting attendance and periods
- Ensure directional flow (one-way flow) in enclosed spaces
- Establish alternating days or extra shifts that reduce the total number of employees in a facility at a given time, allowing them to maintain distance from one another while maintaining a full onsite work week
- Minimize contact among employees by replacing face-to-face meetings with virtual communications and implementing telework, if feasible
- 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
- Post temporary occupancy limits on common spaces (e.g., conference rooms, classrooms, dining areas, etc.)

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- Evaluate new employee operations, circulation and other physical distancing plans to ensure feasibility by expected degrees of physical handicap/mobility challenges
- 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
- Explore ways to reduce the size of necessary gatherings
- Implement policies to limit the number of employees needed to be present to carry out any tasks off of company-owned property
- Limit the number of visitors to a facility to only those necessary for the work

Touch Surface and Object Transfer Controls

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

- Install hands-free arm-pull or foot-operated door openers, where possible
- Install motion-detection sensors in place of switches, where possible
- Encourage frequent hand washing and make hand sanitizer available in several locations, especially near common touchpoints
- Limit the number of employees who handle transfer of objects (food, goods, products) to others
- Provide adequate amounts and locations of tissues, no-touch trash cans, anti-bacterial soap, alcohol-based hand antiseptics, self-serve cleaning wipes and sanitizers
- 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)
- Provide training and information on proper disinfection techniques for shared spaces and objects (when unavoidable)
- Identify priority EPA registered disinfectants/cleaning supplies to disinfect surfaces, shared equipment and facilities
- Provide handwashing and hand sanitizer stations throughout the facility for employees, students, visitors, etc.
- Develop and implement a sanitation plan with increased cleaning schedules to ensure surfaces, shared equipment and rooms are cleaned more frequently
- Provide means by which individuals can sanitize and/or disinfect objects or surfaces when interacting with them
- Provide protective coverings for high-touch surfaces for easier cleaning (eg, touchscreens, keypads)
- 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
- Communicate hygiene and infection control requirements internally and externally
- Train employees on infection prevention and control procedures and WASH (water, sanitation, and hygiene procedures)
- Train and post signage for proper PPE usage, identification, etc.
- Strategically place branded visual signage as a straightforward approach to remind people how to reduce their risk (i.e., with a focus on high-risk areas)

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- Display signage and posters on handwashing and hygiene etiquette
- Create signage to post around your facility communicating expectations for employees, students and visitors
- Conduct 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
- Ensure employer-owned vehicles always have sufficient levels of necessary COVID-19-specific PPE (e.g., masks, gloves, etc.)
- Obtain increased shipments of hand sanitizer, rubs/gels, tissues and other paper products
- 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
- Alternate employee shifts so that the same group of people are exposed only to each other
- Provide equipment to limit direct contact with high-touch surfaces (e.g., gloves)
- In lieu of using a common source of drinking water, such as a cooler, employees should use individual water bottles
- Provide a method for employees to request additional PPE
- Provide employees face coverings, and require them to be worn throughout the facility where social distancing measures are difficult to maintain especially in areas of significant community-based transmission
- Provide employees elastomeric half mask or full face respirators when a respirator is necessary to protect the health of the employee
- Provide employees with safety goggles to protect against splashes, sprays and respiratory droplets

Employee Transportation Considerations

Employee transportation to, from and at the schools should be given due consideration when preparing schools to return to in-person learning. Transportation needs to take into account roadway and non-roadway incidents. Employees must feel they have safe and accessible options to get to and from work after being away as well as safe vehicles and environments if driving is an aspect of their job. Employees at risk for roadway and non-roadway incidents need to have assurances that their safety is a priority. Safety in both cases needs to be a logistical concern (how to keep employees safe), but also needs to take into account perceptions of safety as employees leave their homes to establish transportation routines in new environments. School administrators should consider the following:

- Evaluate and update the travel policies to limit collective (e.g., carpool, vanpool, shuttle bus) transportation and permit and encourage individual travel, where travel is absolutely necessary
- Include clear communication about parking services, shuttle schedules and other transportation information in return to work instructions
- Encourage employees to, if possible, get to work using means that support physical distancing and other recommended preventative measures including wearing masks and regularly washing hands. Offer incentives and support for those who wish to explore new means of transportation or transit.
- Consider providing additional transportation services as able, including increased dedicated parking, shuttle services or rideshare subsidies, and flexible work-from-home policies
- Provide regular information on public transit schedules and other transportation services as they might change or be updated through phased reopenings
- Establish clear guidelines and instructions for acceptable late policies or other flexibility necessary to meet transportation challenges employees might face at short notice
- Encourage employees who choose to drive to take time to re-familiarize themselves with their routes before returning to work and to always obey traffic laws
- Provide instructions and guidelines on how to use public transit safely and how to take steps to sanitize when arriving at work
- Include reminders on safe transportation for and with children, including information on not leaving children unattended near or in vehicles as well as proper seat belt usage
- Provide opportunities for training and education around transportation safety
- Incorporate messages of traffic safety, transportation options and travel expectations in reopening communications with employees
- Take a more active part in regular safety and transportation-related work events, such as Bike to Work campaigns, community traffic engagement and seat belt safety campaigns