

## Questions for Ms. Martin

President and Chief Executive Officer, National Safety Council

## Questions from Chairman Gerald E. Connolly

June 25, 2020, Hearing: "Frontline Feds: Serving the Public During a Pandemic"

### 1. What are some of the best practices employed by the private sector to reopen office spaces during the pandemic? What can public sector organizations learn from these best practices?

The National Safety Council (NSC) has over 15,500 members, many of them from the private sector. As NSC stood up SAFER (Safe Actions for Employee Returns), we asked these members to share their pandemic response plans with us, and many of them did. From this large trove of information, we put together the best practices among them created a list of ten items for employers to consider. This applies for private and public sector employers both.

As federal agencies make plans to return their employees to traditional work environments, consideration should be given to these 10 universal actions [NSC recommends](#) all employers consider before reopening:

1. **Phasing Plan** – Create a phased transition to return to work aligned with risk and exposure levels. This plan should be informed by and tied to clear milestones at the local level, such as levels of positive cases.
2. **Sanitize** – Before employees return, clean and disinfect the workplace and make any physical alterations needed to implement CDC and federal guidelines around physical/social distancing
3. **Screenings** – Develop a health status screening process for all employees
4. **Hygiene** – Create a plan to handle sick employees, and encourage safe behaviors for good hygiene and infection control
5. **Tracing** – Follow proper contact tracing steps if workers get sick to curb the spread of COVID-19, and consider technology solutions available to aide with contact tracing, including limitations on the use of technology with the federal government such as not being able to carry phones into secure rooms
6. **Mental Health** – Commit to supporting the mental and emotional health of your workers by sharing support resources and adjusting relevant policies
7. **Training** – Train leaders and supervisors not only on the fundamentals of safety such as risk assessment and hazard recognition, but also on the impacts of COVID-19 on mental health and wellbeing, as employees will feel the effects of the pandemic long after it is over
8. **Engagement Plan** – Notify employees in advance of the return to work, and consider categorizing workers into different groups based on job roles, bringing groups back one at a time
9. **Communication** – Develop a communications plan to be open and transparent with workers on your return to work process
10. **Assessment** – Outline the main factors your organization is using as guidance to provide a simplistic structure to the extremely complex return-to-work decision

### 2. Do your members have contingency plans should a spike in coronavirus occur in their region or state? If so, what do they typically entail?

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.

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

The National Safety Council believes that 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)

### **3. Which federal agencies have sought and incorporated your input on their re-entry strategies?**

The Department of the Navy and the National Institutes for Occupational Safety and Health (NIOSH) serve on the SAFER (Safe Actions for Employee Returns) task force. Additionally, the Department of Transportation and the Occupational Safety and Health Administration receive regular updates on the SAFER work.

Additionally, the National Safety Council (NSC) has shared SAFER resources widely with Capitol Hill offices, and the Office of Management and Budget, Cybersecurity and Infrastructure Security Agency, Centers for Disease Control and Prevention, Federal Emergency Management Agency, the Department of Health and Human Services, and the Department of Labor.

NSC welcomes the opportunity to work more with federal agencies to design safe re-entry strategies.

**4. What analysis should agencies conduct to determine when and what portion of their workforces reenter physical workspaces or continue telework or administrative leave? Who should be provided with this analysis and justification?**

The National Safety Council (NSC) recommends a thorough evaluation of work environments and appropriate training and education of the workforce before bringing people back. The evaluation should address topics like disinfection of workspaces, public access to workspaces, hazard assessments, decisions on PPE use, education and training of the workforce on new protocols, and more. Additionally, workplaces should consider environmental and societal conditions of the location of the business. Specifically, workplaces should consider physical space limitations with appropriate physical distancing protocols in place (e.g., fewer workstations occupied to maintain distancing).

NSC believes that if employers are not sure if they can bring their employees back to physical office locations safely, then they should consider whether they bring them back at all.

To govern decisions about returning staff to their traditional work environments, NSC developed and will use a four-phase system:

**Phase 0: Widespread Transmission & Significant Restrictions**

- Infection and death rates are high and rising
- Local and/or federal stay-at-home orders are in place
- Only essential businesses are allowed to operate
- Social distancing is required in public settings
- Face coverings are required in public settings

**Phase 1: Flat Transmission & Reduced Restrictions**

- Infection and death rates are high and trend is flat
- Local and/or federal stay-at-home orders are in place
- Some non-essential businesses are allowed to reopen
- Social distancing is required in public settings
- Face coverings are required in public settings

**Phase 2: Contained Transmission & Minimal Restrictions**

- Infection and death rates are medium and dropping
- Local and/or federal stay-at-home orders have been lifted
- Additional non-essential businesses are allowed to reopen
- Social distancing is recommended
- Face coverings are recommended

**Phase 3: Monitored Transmission & Long-Term Policy**

- Infection and death rates are low and dropping
- Local and/or federal stay-at-home orders have been lifted
- All businesses are open
- Social distancing is optional

- Face coverings are optional

Information sharing about returning to work should include senior leadership at an organization and safety leaders within it as well as employees affected by the phasing plan. Employees should be made aware of the rationale for staffing decisions for each phase of the plan. For the federal government, this would include political and civilian leaders, as well as people in occupational safety and health roles at an agency. Employees working remotely ideally should be given the choice to remain working remotely if they have fear or anxiety about returning to a physical work environment and/or have medical complications that might exacerbate a COVID-19 diagnosis.

### **5. How do businesses coordinate their use of shared office building space? What strategies have been most effective?**

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 both inside and outside of the organization's control. The National Safety Council (NSC) SAFER (Safe Actions for Employee Returns) [Physical Playbook](#) recommends that employers consider the following:

#### **Buildings, Facilities and Operations**

Businesses requiring employees to return to physical environments 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](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

### **6. What precautions should be taken and what equipment should be provided before returning employees to office space? More than PPE, what about workplace shields? Commuting concerns? What about visitors to the office?**

The National Safety Council (NSC) SAFER (Safe Actions for Employee Returns) [Transportation Playbook](#) contains recommendations that cover commuting concerns. As employees return to work, it is possible that previously utilized routes and forms of transportation will no longer be readily available or as reliably scheduled as before the pandemic hit. Employers will need to make efforts to provide

clear instructions on transportation options to work as well as guidance on how to communicate with employers if workers find themselves with unexpected transportation delays or disturbances.

Employers may want to consider the following:

- Include clear communication about parking services, shuttle schedules and other transportation information in return to work instructions.
- Encourage workers to travel, if possible, 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 workers 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.

NSC strongly recommends that non-employees entering a workspace take precautions. For contractors and temporary workers, they should be subject to the same requirements as full-time workers. For customers, there should be recommended safety protocols in place such as requiring facial coverings, having hand washing stations readily and easily available, installing barriers to separate the employee-customer interaction, using cues to indicate physical distancing recommendations, and others. Additionally, workplaces should stay informed on new and changing recommendations as they are released. The SAFER website can help with this, [www.nsc.org/safer](http://www.nsc.org/safer).

## **7. How have industries gone about communicating their office reopening plans to workers in the private sector?**

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 COVID-19 change management communications strategy. The NSC SAFER [Communications Playbook](#) recommends that employers consider the following:

### **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 FAQs 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 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
- 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