

U.S. Employer Checklist

Re-opening Strategies and Return to Work Policies After COVID-19 Outbreak¹

The following is a list of suggested practices for businesses to consider during the reopening process. For additional industry-specific guidance, please consult the following addenda for the (1) retail industry; (2) production/manufacturing industry; (3) hospitality industry; and (4) transportation industry. Please note that the recommendations preceding the Retail Industry Addendum are suggested practices for employers in all industry areas and are generally applicable. Prior to implementation, all practices and policies should be evaluated to ensure that they are compliant with federal law and guidance, as well as state and local law.

Please note that state and local ordinances may have additional or differing requirements.

- Continue encouraging employee hygiene and social distancing measures**
 - Implement or continue a temperature testing procedure² for employees to ensure that no one is coming into the workplace with a fever (temperature of 100.4 or higher). Refer to *Model Temperature Testing Policy*.
 - Ensure that the employee administering the temperature tests is protected. For example, depending on how the test is administered, the employee may need to wear gloves, a gown, a face shield or goggles, and either a face mask or a respirator (e.g., an N95 filtering facepiece).
 - Consult with counsel to determine requirements of applicable state privacy notification laws, which may entitle employees to notice at the time of collection describing what information is being collected (body temperature) and the purpose(s) for which the information will be used (to maintain a safe work environment).

¹ Per [guidance](#) from the federal government, states can safely proceed to re-open businesses when: (1) there is a downward trajectory of influenza-like illnesses reported within a 14-day period and a downward trajectory of covid-like syndromic cases reported within a 14-day period; (2) there is a downward trajectory of documented cases within a 14-day period or downward trajectory of positives tests as a percent of total tests within a 14-day period (flat or increasing volume of tests); and (3) hospitals can treat all patients without crisis care and a robust testing program is in place for at-risk healthcare workers, including emerging antibody testing. State and local officials may need to tailor the application of these criteria to local circumstances.

² For unionized companies, prior to implementing a temperature testing procedure, consult the collective bargaining agreement and/or the union as applicable.

- Provide a private setting for screening and ensure that all communications between screener and employee are confidential. Consider having employees who do not pass the screening test move to a safe and private location to review next steps, including return to work criteria.
- Consider implications of storing information that is collected during the screening process and minimize the information that is collected (i.e., consider when information should be recorded and, if recordation is necessary, limit to factual health-related information, and treat information as a confidential medical record).
- If necessary, choose to administer COVID-19 testing to employees before they enter the workplace to determine if the employee has the virus.³
- In the event that reliable COVID-19 antibody testing becomes widely available, consult with counsel and applicable federal, state, and local guidelines regarding the company's ability to request, require, disseminate, and/or use employee antibody test results in the workplace.⁴
- Provide tissues and no-touch disposal receptacles.
- Place hand sanitizers in multiple locations to encourage hand hygiene.
- Discourage handshaking and encourage the use of other noncontact methods of greeting.
- Provide and/or permit employees to wear face coverings or masks as recommended or required by the CDC and state and local health officials.
- Routinely clean and disinfect all frequently touched surfaces in the workplace, such as workstations, keyboards, telephones, handrails and doorknobs.
- Provide disposable wipes so that commonly used surfaces can be wiped down by employees before each use.

³ [EEOC guidance](#) provides that an employer may choose to administer COVID-19 testing to employees before they enter the workplace to determine if they have the virus; however, employers should ensure that the tests are accurate and reliable. Consult with counsel and with guidance from the U.S. Food and Drug Administration (FDA) to determine what may be considered safe and accurate testing.

⁴ EEOC currently does not provide guidance on COVID-19 antibody testing for employees but it may issue guidance for employers as this testing becomes more widely available.

- Consider adapting the workspace as much as practicable to facilitate social distancing and allow employees to remain six-feet apart from one another.
 - Stagger breaks and remind employees to remain six-feet apart from one another during breaks.
 - Continue conducting meetings via teleconference or web conference and discourage face-to-face meetings unless absolutely necessary.
 - Continue to prohibit non-essential work travel and follow government travel guidelines.
 - Open all doors, where feasible, to reduce points of contact.
- **Continue enforcing personnel policies regarding employees who are symptomatic of COVID-19 or recently have been diagnosed with or exposed to COVID-19**
- Require any employee who is symptomatic of COVID-19 or has been diagnosed with COVID-19 in the past 14 days to continue to work from home or take leave until the employee qualifies to return to work. Refer to *Response to a Confirmed Case of COVID-19 in the Workplace*.
 - Require any employee who becomes sick or displays COVID-19 symptoms during the employee's work shift to go home immediately. If it is not possible for the employee to go home immediately, the employee must self-isolate until able to leave work. The surfaces of the workplace should be cleaned immediately.
 - If an employee has been exposed to COVID-19⁵ and is asymptomatic, determine if the employee is a critical infrastructure worker.⁶

⁵ A potential exposure means being a household contact or having close contact within six-feet of an individual with confirmed or suspected COVID-19. The timeframe for having contact with an individual includes the period of time of 48 hours before the individual became symptomatic.

⁶ The sectors deemed critical infrastructure by the Cybersecurity and Infrastructure Security Agency (CISA) include (1) healthcare/public health, (2) law enforcement, public safety, and other first responders, (3) food and agriculture, (4) energy, (5) water and wastewater, (6) transportation and logistics, (7) public works and infrastructure support services, (8) communications and information technology, (9) other community or government-based operations and essential functions, (10) critical manufacturing, (11) hazardous materials, (12) financial services, (13) chemical, (14) defense industrial base, (15) commercial facilities, (16) residential/shelter facilities and services, and (17) hygiene products and services. For additional information, please consult the Department Homeland Security [CISA guidance](#) and any applicable local orders.

- **If employee is NOT a critical infrastructure worker:** Instruct employee to not report to work and self-quarantine at home for a 14-day period.⁷
- **If employee is a critical infrastructure worker:** The company has the discretion, if business needs warrant or require, to follow [CDC guidance](#) for safety practices for critical infrastructure workers who are asymptomatic but have been exposed to COVID-19. These CDC guidelines should be confirmed against any state or local orders related to quarantines, workplace operations, stay-at-home, shelter-in-place, and other isolation related requirements.⁸

□ **End furloughs or temporary leaves of absences for employees**

- Assess workforce and determine (1) which employees will be recalled at the end of the furlough or temporary leave of absence and which employees (if any) may need to be terminated, and (2) what positions and salaries recalled employees will have. Consider any state or local predictive scheduling laws.
- If some or all furloughed employees may not be recalled due to changing business conditions, work with counsel to perform a disparate impact analysis, assess whether additional obligations may be triggered (such as WARN Act notifications, termination payments, etc.), and decide whether to provide severance to separating employees in exchange for a release of claims.
- Document objective decision-making criteria for recalling or terminating employees to protect the company from potential discrimination claims. Decisions to recall certain employees **cannot** be based on apparent higher risk of COVID-19 complications (i.e., older or pregnant employees).
- Provide a Furlough Recall Letter to furloughed employees to whom re-employment will be offered. The Furlough Recall Letter should include the following:
 - Employment offer;
 - Return-to-work date;
 - Terms of employment, such as position, supervisor, salary, hours, and exempt/non-exempt status;
 - Identification of anything that has changed in the employee's offered position, as compared to the employee's pre-furlough position;

⁷ This practice is not required by public health mandate, but it is a highly suggested best practice in order to slow the community spread of the virus, which is a primary health priority of the CDC.

⁸ Note that some states are not following the CDC guidance and are requiring critical infrastructure employees with known exposure to someone with COVID-19 to self-quarantine.

- Benefits status, including how the recall from furlough affects benefits, accrued PTO, and sick leave (being mindful of existing company policy and applicable law);
 - Information regarding the company's accommodation request process should an employee need a reasonable accommodation upon the employee's return to work;
 - Any new policies and procedures relating to re-opening, such as staggered shifts, work from home, social distancing, regular cleanings, personal hygiene, reduced customer capacity, and any industry-specific or government-mandated requirements;
 - Appreciation for the employee's commitment to the company and his or her understanding and flexibility during this trying time; and
 - Contact information for follow-up questions.
- Update payroll provider about changes to active status of employees that accept offer to return.
 - Re-train employees who are recalled on proper safety guidelines.

Return employees to in-office work

- Closely monitor and review all federal, state, and local orders regarding the re-opening of businesses and expiration of stay-at-home or shelter-in-place orders. Only require employees to return to in-office work when it is safe to do so and authorized by law.
- Follow all industry-specific guidance that pertains to the company's industry area. Consult the following addenda for information relevant to the (1) retail industry; (2) manufacturing/production industry; (3) hospitality industry; and (4) transportation industry.
- Have employees return to work incrementally. Start by requiring only essential personnel to come into the office to begin working for a one-week period and gradually increase the number of employees in the workplace week by week until all employees are back working in the office.
- If your employees have been able to work remotely, consider allowing employees to return to work voluntarily for the first few weeks of reopening. This may give the business an opportunity to test new procedures with a reduced headcount in the workspace and provide employees with needed flexibility to adjust to returning to work.

- Consider having employees return to work on staggered schedules or shifts so that not all employees who have returned to in-office work are present in the workplace at the same time.
- Provide as much notice as possible to employees of their expected return to in-office work date. Be flexible with employees transitioning from teleworking to working back in the office (i.e., consider allowing employees to continue teleworking two days per week and working in office three days per week at first).
- Accommodate employees who fall within the higher-risk populations, as defined by the CDC guidelines, with lower-exposure work assignments or by allowing them to stay home or continue teleworking, if requested by the employee. Do **not** prevent employees in higher-risk populations from returning to work if they wish to do so.
- Remind employees of leave entitlements under the Families First Coronavirus Response Act (“FFCRA”), if applicable; as many employees may need to request leave to care for children if employers and places of business have reopened, but schools and other child-care facilities have not.
- Implement and communicate a procedure to employees for returning company property used during teleworking upon returning to in-office work.

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Addendum—Retail Industry

- **Implement environmental cleaning and hygiene procedures to protect employees and customers/clients present on company premises**
 - Routinely clean and disinfect surfaces and equipment, including cart and basket handles, with Environmental Protection Agency-approved cleaning chemicals from List N or that have label claims against the coronavirus.
 - Provide access to handwashing facilities, including those available in public restrooms, and allow employees sufficient break time to wash hands, as necessary.
 - Note that some state executive orders require employees to wash their hands a specified number of times, for example, every 30 minutes.
 - Provide disinfecting wipes, as available, at point of entrance for customers to disinfect carts, at cash registers and/or other appropriate locations.
 - Adopt remote sales methods for transactions, including phone orders, online sales, delivery, and email-based transactions. If not possible, sanitize credit card machines (including pens) regularly and consistently.
 - Discontinue all self-serve foods (e.g., salad bar, olive bar) and product sampling.
 - Work with facility maintenance staff to increase air exchanges in building(s).
 - Discourage customer use of reusable checkout bags and require customers to bag their own items if they choose to use such bags.
- **Conduct a job hazard analysis**
 - Conduct a job hazard analysis for the assessment of workplace hazards associated with COVID-19 and for developing and implementing hazard prevention methods.
- **Require employees and/or customers to wear face coverings and personal protective equipment (PPE) as necessary**
 - Assess the types of PPE required during a COVID-19 outbreak based on employees' risk of being infected with SARS-CoV-2 while working and job tasks that may lead to exposure. This analysis should be based on individual employees' job tasks.
 - Where it is determined that employees do not need to wear PPE for their own protection, employees can still be required to wear gloves and face masks over their nose and mouth at all times. While cloth face masks are not respirators, some state and local orders require retail employees to wear a face covering. At a minimum, where a state and local order does not require an employee to wear a face covering, it is a best practice to provide and recommend that employees use face coverings.

- Note that some states are requiring customers to also wear face coverings and requiring retail establishments to turn customers away if they are not wearing a face covering.

□ **Continue enforcing social distancing measures**

- Employees should physically distance when they take breaks. Stagger breaks and do not allow employees to congregate in the break room or share food or utensils.
 - Consider requiring employees to each lunch alone in their personal vehicles or at their desks and to bring their own lunch from home.
 - Provide sanitizing wipes and instruct employees to sanitize microwaves, coffee pots, and other communal items in break rooms or cafeterias after each use.
- If possible, use a drive-through window or offer curbside product drops in parking lots or outdoor tables in which materials are loaded into customers' trunks, truck beds or cargo areas. Employees should not be permitted to place any product into the cab or passenger area of a customer's vehicle.
- If a drive-through window or curbside pick-up is not possible, consider:
 - Limiting store occupancy at a percentage of store capacity, for example 50 percent, or the requisite percentage mandated by local or state order, if applicable. At entrance, staff should maintain a count of the number of customers entering and exiting stores and should ensure social distancing is being maintained if lines form to enter the store.
 - Note that some state and local ordinances limit store capacity at differing levels, for example, between 20 and 50 percent.
 - Practicing sensible social distancing, which could include opening only every other cash register to maximize space between customers and employees at checkout lines, temporarily moving workstations to create more distance and installing Plexiglas partitions between workstations.
 - Providing Plexiglas sneeze guards and shields at every cashier station.
 - Clearly marking six-foot spacing in lines on floor at checkout lines and other high-traffic areas and, as much as practicable, provide ways to encourage six-foot spacing in lines outside the store.
 - Posting conspicuous signage and floor markings to direct customers and limit bottlenecks and/or encourage spacing and flow in high-density areas.
 - Having one-way aisles in stores where practicable to maximize spacing between customers. Identify one-way aisles with conspicuous signage and/or floor markings.

- Temporarily closing portions of aisles for restocking to ensure customers are staying at least six-feet away from employees.

□ **Develop customer communication strategies**

- Communicate with customers through in-store signage, public service announcements and advertisements, that there should only be one person per household during shopping trips, whenever possible.
- Communicate to customers that they should not enter the premises if they are not feeling well or suffering from any symptoms of COVID-19.
- If practical for the company's business, consider implementing a questionnaire for customers to inquire if they are: (1) symptomatic of COVID-19; (2) have been symptomatic of COVID-19 in the past 14 days; or (3) have had close contact with an individual who is symptomatic of or has been diagnosed with COVID-19 in the past 14 days. If possible, consider taking customers' temperatures.
 - Avoid including personal information or identifiers on any questionnaire or similar screening mechanisms or consider requirements of applicable state privacy notification laws prior to collecting such information, including addendums to privacy policies and implications to breach notification laws.
 - Arrange for confidential and secure collection of screening information.
 - Have a planned response in place should a customer refuse screening and include a customer relations representative.

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Addendum—Production/Manufacturing Industry

- **Prepare the workplace and workforce prior to reopening**
 - Review and understand local and state guidelines and directives, which may dictate the ability to re-open a manufacturing facility. For multi-state employers, guidelines and directives will likely differ across jurisdictions.
 - Remove all non-essential objects from the facility, particularly in high-traffic zones, in order to minimize the number of exposed surfaces.
 - Increase ventilation rates and increase the percentage of outdoor air that circulates into the facility.
 - Address mobility and immigration issues for foreign nationals who may be on a temporary work-visa and who may have had to move in and out of areas affected by COVID-19.
 - Evaluate and consider automation solutions in order to reduce the amount of employees on a production line or in a facility. Potential solutions may include autonomous forklifts, cranes, drones, assembly robots, and predictive maintenance of machinery.

- **Prepare for possible business disruptions**
 - Establish frequent and transparent communications with supply chains and prepare for unexpected disruptions to the supply chain, which may limit the amount of employees needed.
 - Consider increased cross-training across employees so that employees can perform multiple job duties in the event of prolonged absences.

- **Promote social distancing measures**
 - Avoid having any non-essential visitors or clients enter the facility or production floors. Require all visitors or clients to have their temperatures checked and/or complete a health-screening questionnaire prior to entering. Limit access to production floors to essential managers and employees.
 - Consider requirements of applicable state privacy notification laws, which may entitle visitors or clients notice at the time of collection describing what information is being collected (body temperature/questionnaire information), the purpose(s) for which the information will be used (to maintain a safe environment), and whether the information will be shared.
 - Arrange for confidential and secure collection of screening information.

- Consider privacy implications of collecting and storing any information that identifies an individual, including breach notification laws and addendums to privacy policies.
 - Allow employees who are able to telework to continue doing so; these employees may include human resources, accounting, management, administration, etc.
 - Consider staggered start times so no employees are entering the facility or production line at the same time.
 - In tandem with redefined production goals, consider staggered shifts or operations at reduced capacity in order to limit the amount of employees in a facility.
 - Consider zoning various operations throughout the facility and limit employees to only the zones needed to perform their respective tasks.
 - Rearrange workstations on a production floor to maintain a minimum six-foot separation. Where a minimum six-foot separation is not feasible, consider installing physical barriers between employees.
 - Adhere to federal, state, and local guidance regarding use of face coverings for employees, especially for those who are unable to appropriately social distance on a production line. Wherever possible, require employees to wear gloves and face masks over their nose and mouth at all times that they are interacting with coworkers.
 - Stagger break and lunch periods to minimize the number of employees in a common area. Require employees to maintain social distancing requirements in break rooms.
- **Implement environmental cleaning and hygiene procedures to protect employees**
- Maintain a source and supply of new PPE materials, including masks, gloves, and sanitizer.
 - If possible, install alcohol-based hand rub dispensers throughout the facility.
 - Increase the frequency of sanitation efforts, focusing on high-traffic and high-touch areas. Provide sanitizing wipes throughout the facility and train employees to continuously use them on each high-touch surface.
 - Conduct routine cleaning between shifts and disinfect all touched surfaces.
 - Post signage throughout the facility to promote proper hygiene activities as recommended by the Center for Disease Control.

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Addendum—Hospitality Industry

- **Comply with general social distancing and face covering guidelines for the Hospitality Industry**
 - Consider reducing open hours or maximum capacity.
 - Adhere to federal, state, and local guidance regarding use of face coverings for employees, especially for those who have direct contact with guests and customers or are unable to appropriately social distance.

- **Take certain preventative actions to eliminate the spread of COVID-19 in hotels, motels, and other retail lodging**
 - Wherever possible, require employees to wear gloves and face masks over their nose and mouth at all times that they are interacting with guests or coworkers.
 - Continue use of disinfectant products that have been pre-approved by the U.S. Environmental Protection Agency (EPA) for use against emerging viral pathogens.
 - Disinfectants should be applied during routine cleaning of guestrooms, public spaces, health club areas, and meeting rooms.
 - Ensure that disinfectant is used when washing linens. Require guests to place linens in plastic bags outside of guest rooms for laundering.
 - Clean and disinfect public spaces and high-touch areas, including the front desk, tables in the lobby area, door handles, buttons on elevators, water fountains, room keys and key cards, and ice and vending machines frequently.
 - If possible, provide disposable disinfectant wipes to front-of-house staff to disinfect surfaces between guests.
 - Review and implement a record-keeping process to maintain records of guest and staff movement that will help trace who has been in contact with any infected individuals that have visited the property.

Specific Preventative Actions for Hotel Workers

- Train housekeeping staff to use the disinfectants safely and correctly. Staff should wear gloves and masks when cleaning.
- Schedule and perform routine cleaning and disinfection of all contact surfaces in public areas, guestrooms, television remote controls, toilet flush handles, door handles, water faucet handles, and flooring.
- Train hotel staff and post signage to remind guests and workers to wash hands with soap and warm water frequently, for at least 20 seconds each time.
- If possible, provide alcohol-based hand sanitizer that contains at least 60 percent alcohol in all guest contact areas and to all staff.
- Advise staff to practice social distancing by standing at least six-feet away from guests and other workers.

- Post signage for guests and employees directing them to maintain a six-foot distance when in common areas, including the lobby, convenience marts, dining areas, and hallways.
- Post signage encouraging guests to limit use of common elevators and stairwells so as to allow for adequate social distancing.

Specific Preventative Actions for Health Club Facilities in Hotels and Motels

- Limit use of health club facilities to a certain number of guests to allow for social distancing.
- Post signs at the entrance instructing guests not to visit if they have symptoms of respiratory infection.
- Implement a questionnaire for guests to inquire if they are: (1) symptomatic of COVID-19; (2) have been symptomatic of COVID-19 in the past 14 days; or (3) have had close contact with an individual who is symptomatic of or has been diagnosed with COVID-19 in the past 14 days. Restrict guests with fever or acute respiratory symptoms.
- If possible, install alcohol-based hand rub dispensers throughout the health club facility.
- Post signs throughout the facility directing guests to adhere to social distancing protocols and hand and respiratory hygiene.
- Consider discontinuing the provision of towels in health club facilities to reduce amount of contaminated linens.
- Position disinfectant spray and paper towels in multiple locations and post extra signage to ensure members are following standard self-cleaning protocol.
- Ensure every sink is well-stocked with soap and hand drying materials for hand washing.
- Position waste receptacles in accessible areas near exits for guests to discard paper towels.

Specific Preventative Actions for Environmental Services Workers

- Assess the hazards to which their workers may be exposed; evaluate the risk of exposure, and select, implement, and ensure workers use controls to prevent exposure.⁹
- Ensure that areas being cleaned have proper ventilation, including by increasing air changes per hour and air circulation before and during cleaning tasks, and especially if workers need to access contaminated areas during the 24 hours that

⁹ See the Occupational Health and Safety Administration's guidance addressing examples of environmental services work tasks associated with the exposure risk levels in OSHA's occupational exposure risk pyramid, which may serve as a guide to hospitality employers.

the CDC and OSHA recommend waiting between the time of contamination and when cleaning activities take place.

- When cleaning contamination from potentially infectious materials, or other suspected or known sources of COVID-19:
 - Restrict access to contaminated areas and post signage, only permitting access by essential personnel for up to 24 hours if possible.¹⁰
- Ensure that workers do not use cleaning procedures that could re-aerosolize infectious particles, such as dry sweeping or use of high-pressure streams of water or cleaning chemicals
- Instruct workers to avoid touching their faces, including their eyes, noses, and mouths, particularly until after they have thoroughly washed their hands upon completing work and/or removing PPE.
- Consider whether the hazard and risk assessments for employees engaged as environmental services workers warrant the use of more protective PPE ensembles.

□ **Take certain preventative actions to eliminate the spread of COVID-19 in restaurant and food service facilities**

Specific Preventative Actions for Dine-In Establishments

- Wash, rinse, and sanitize food contact surfaces, dishware, utensils, food preparation surfaces, and beverage equipment after use.
- Frequently disinfect surfaces repeatedly touched by employees or customers such as door knobs, equipment handles, check-out counters, and grocery cart handles.
- Frequently clean and disinfect floors, counters, and other facility access areas using EPA-registered disinfectants.
- If changes are made to normal food preparation procedures, service, delivery functions, or staffing, provide proper training for employees with new or altered duties.
- Discontinue operations, such as salad bars, self-serve stations, buffets, and beverage service stations that require customers to use common utensils or dispensers.
- Implement operational changes in order to enforce social distancing by maintaining a six-foot distance from others.

¹⁰ When workers have occupational exposure to human blood, body fluids, or other potentially infectious materials, employers also must follow OSHA's Bloodborne Pathogens standard (29 C.F.R. § 1910.1030).

- Continue to use sanitizers and disinfectants for their designed purposes.

Specific Preventative Actions for Food Pick-Up and Delivery

- Establish designated pick-up zones for customers to help maintain social distancing.
- Practice social distancing when delivering food, e.g., offering “no-touch” deliveries and sending text alerts or calling when deliveries have arrived.
- Routinely clean and sanitize coolers and insulated bags used to deliver foods.
- Increase the frequency of cleaning and disinfecting of high-touch surfaces within the delivery vehicle.

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Addendum—Transportation Industry

- **Implement environmental cleaning and hygiene procedures to protect employees and customers/clients present on Company premises**
 - Routinely clean and disinfect surfaces and equipment, including door handles, steering wheels, poles, straps, seats, and ticketing machines with Environmental Protection Agency-approved cleaning chemicals from List N or that have label claims against the coronavirus.
 - Routinely clean and disinfect employee communal spaces, including break rooms, with Environmental Protection Agency-approved cleaning chemicals from List N or that have label claims against the coronavirus.
 - Clean and disinfect surfaces, equipment, and tools between employee shifts.
 - Provide access to handwashing facilities, including those available in public restrooms, and allow employees sufficient break time to wash hands, as necessary.
 - Provide hand sanitizer, as available, to employees.
 - Provide disinfecting wipes, as available, to employees.
 - Wherever possible, increase number of hand sanitizer dispensers in waiting areas and platforms.
 - Wherever possible, require employees to wear gloves and face masks over their nose and mouth at all times that they are interacting with customers or co-workers.

- **Continue enforcing social distancing measures**
 - Wherever possible, for those in the transportation industry that interact with customers:
 - only allow onboarding and off-boarding at points of entry farthest from operators,
 - install Plexiglas dividers between the operator and customers,
 - clearly mark spacing in lines on the floor of the vehicle from the operator to the customers, as much as practicable, and
 - limit or eliminate customer employee interaction (e.g., through contactless ticket confirmation and through eliminating beverage/food services).
 - Wherever possible, implement procedures to ensure employees can maintain at least six-feet of distance between each other, including during shift changes.
 - Post conspicuous signage about the importance of social distancing.
 - Where customers have assigned, ticketed seats, limit the number of tickets sold and only sell seats that are appropriately spaced apart, as much as is practicable.

- Where customers have ticketed, unassigned seats, limit the number of tickets sold and the number of customers that can enter the vehicle at one time. This may result in having to increase schedules to accommodate customer need.
 - Limit the number of ticket windows, ticket machines, and customer service windows open at one time.
 - Place floor markings to ensure six-feet of distance is maintained between customers wherever lines are likely to form, including at ticket windows, ticket machines, and during onboarding.
 - Where necessary, close communal spaces, such as snack cars on trains. If not practicable to do so, limit the number of customers permitted in communal spaces and limit any food and drink offerings to pre-packaged food and drinks.
- **Develop customer communication strategies**
- Communicate with customers through signage, and public service announcements and advertisements, the importance of social distancing from employees and other customers, general hygiene considerations, and COVID-19 symptoms.
 - Communicate with customers about how re-opening affects existing reservations and tickets and continue communication regarding cancellation and refund information.
- **Continue enforcing COVID-19 personnel policies**
- Require any employee who becomes sick or experiences any symptoms of COVID-19 during the employee's work shift to go home immediately. If it is not possible for the employee to go home immediately, the employee must self-isolate until able to leave work. The surfaces of the workplace should be cleaned immediately.
 - For those in the transportation industry whose employees travel between states, develop policies and procedures regarding what to do if the employee becomes sick while in a different state because of a work assignment.
 - Employees should physically distance when they take breaks. Stagger breaks and do not allow employee to congregate in the break room or other communal space, or to share food or utensils.

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