

This document is subject to updates as more information becomes available and we recommend you check back often.

1 Planning/Considerations for Returning to the Workplace

Company Policies

- Review Paid Sick Leave, Paid Time Off, Vacation and Personal Time Off policies and adjust as needed. (These policies should only be adjusted prospectively, not retroactively, and with advance communication to affected employees.)
 - Review leave policies to ensure they are flexible and non-punitive to allow sick employees to stay home.
 - Leave policies should also account for those who need to stay home with children if there are school or day care closures or to care for sick family members.
- Remind worksite employees of your paid time off programs and policies.
- Review teleworking policies to ensure it meets company objectives. Consider developing a teleworking policy if one is not in place.
- If applicable, review any expense reimbursement policies to address telework expenses.
- Review your travel policy against the Centers for Disease Control and Prevention (CDC) [guidelines](#) and your company objectives. Explore alternatives to travel when available.
- If travel is required, prepare to address worksite employee concerns or fear over traveling.
- Review meal and worksite employee break policies to ensure they are safe and compliant.
 - Ensure non-exempt worksite employee break policies state they must refrain from working during their break if they choose to remain at their desk.
 - Some states and municipalities require that worksite employees are allowed to leave the premises during break periods.

Posting Notices

- If applicable, post new [notices](#) in the workplace related to Families First Coronavirus Response Act (FFCRA) and Paid Sick Leave. Share notices electronically if your worksite employees are remote.

Workplace Safety

Deciding the Right Time to Reopen the Workplace:

- Monitor federal, state and local re-opening guidance.
- Review [Occupational Safety and Health Act \(OSHA\) and CDC guidance](#) for best practices and requirements for employers.
- Consider whether some or all worksite employees should continue to telework or work remotely to lessen the impact of a sudden opening and to address safety concerns.

Infected Worksite Employees

- Develop an infectious disease policy.
- Develop protocol for dealing with worksite employees with known or suspected [COVID-19 symptoms](#).
- Develop notification procedures for worksite employees that may have encountered an infected worksite employee.
- Determine what sick leave or work from home steps may be necessary.
- Develop social distancing protocols for the workplace consistent with federal and state-level guidance.

Cleaning and Disinfecting

- Develop cleaning and disinfecting protocols based on the [CDC guidelines](#).
- Develop cleaning and disinfecting protocols when there are known or suspected cases of COVID-19 at the workplace.
- Consult or contract with custodial or janitorial service to ensure frequent and thorough cleaning of the workplace, including during and after work hours prior to the next workday.
- Make cleaning/sanitizing supplies available to employees.

Office Visitors

- Determine office visitor protocol.
 - Will visitors be allowed in the workplace? Under what conditions?
 - Are there new procedures for vendors that come into the workplace? How will you communicate those procedures or new requirements to vendors?
 - How will you address clients and prospects that visit the workplace?

Masks and Face Coverings

- Determine your mask or face covering protocol based on CDC or local public health department [guidelines](#) and determine if there are applicable state orders requiring employees to wear face coverings in the workplace and/or when interacting with the public.
 - Will you require worksite employees to wear masks or face coverings? It is recommended employers pay for masks or face coverings for worksite employees, and in some locations the employer is required by law to pay for such items.
 - How will you address a worksite employee that refuses to wear a mask or face covering? Work remotely? Employee discipline?

Office Equipment

- Consider removing shared tools such as printers, paper cutters, microwaves, refrigerators, coffee makers, etc. or provide disinfecting products next to the shared tools for worksite employee use.
- Consider temporarily switching to disposable items where possible to limit exposure.

Handwashing

- Post handwashing signs near sinks and throughout the workplace.
- Ensure paper towels and soap dispensers are regularly filled.

Workplace Space

- Evaluate conference room configurations to ensure seats are six feet apart.
- Evaluate break rooms and ensure:
 - A cleaning procedure has been established.
 - Configuration of the room meets [CDC guidelines](#).
 - Consider setting limits to occupancy or staggering breaks to limit exposure.
 - Post appropriate signage.
 - Communicate to employees that heightened cleaning protocols are in place.
- Review cubicle configurations to ensure they meet the [CDC guidelines](#).
 - Consider adding plexiglass dividers.
 - Consider establishing one-way hallways and walk paths.
- Consider increasing air circulation and improving air filtration.
- Review changes to occupancy requirements.

Management Coaching

- Establish the company's priorities and ensure managers lead with these priorities (e.g., workplace health and safety, customer focus, etc.).
- Educate managers on your company's updated paid time off processes and ensure they respond to requests with empathy.

Transitioning from Remote to the Workplace

- Develop a plan to obtain equipment that was issued to worksite employees for remote work.
- Develop a process for responding to worksite employee concerns regarding COVID-19 exposure or requests to remain working remotely.
- Evaluate if there are any considerations that may prevent a worksite employee from returning to the workplace.
 - Are childcare facilities open?
 - Is the worksite employee under a shelter in place or other municipal restrictions?
 - Is safe transportation available for the worksite employee to get to the workplace?

2 Worksite Employee Considerations

Hiring (including rehires) and Onboarding for New Worksite Employees

- Review recruitment processes.
 - How will interviews be conducted?
 - Do current job postings need to be adjusted due to changes in skill requirements or job duties?
Tip: Consider expanding the recruitment area if remote work is available
- For worksite employees hired during the workplace closing, remember to have them provide the required I-9 documentation within three days of opening the workplace.
- Review onboarding procedures. Do changes need to be made regarding equipment, network access, etc.?

Compensation

- Review any changes that were made to compensation and evaluate if prospective adjustments should be made.
 - Worksite employees moved from exempt to non-exempt or from salary to hourly.
 - Worksite employees changed from full time to part time or their work hours changed.
 - Provide appropriate notification to any worksite employee you plan to return to their prior status, compensation, work hours, etc.
- Evaluate if any changes need to be made to bring worksite employees back to work.
 - Do they need to return at a different (lower) compensation or fewer hours?
 - Will worksite employees require higher compensation based on increased responsibilities?
- Review annual increase processes and bonus programs to if they need to be adjusted.

Payroll

- Review compensation compliance for returning exempt worksite employees to the workplace. Worksite employees returning in the middle or end of your established workweek are required to be compensated for the entire workweek. Consider having exempt worksite employees report to the workplace at the beginning of the workweek.
- If you plan to conduct temperature scanning, time spent undergoing scanning may be compensable.

Transition a Worksite Employee from Furlough to Active

- Review paid time off accruals that were not paid out prior to furlough for accuracy. Communicate any changes to worksite employees.
- Re-issue equipment and update network status.
- Provide all non-exempt worksite employees returning from furlough required Wage Theft Prevention Act Notices, as applicable.
- Change status in the [TriNet](https://login.TriNet.com) (login.TriNet.com) platform.
- Unemployment considerations: What if a worksite employee refuses to return to in order to receive unemployment benefits?
- Review benefit action items for returning worksite employees.

Employee Terminations

- Notify any worksite employees that are terminated or will not be brought back from furlough.
- Consider offering severance and/or outplacement services in exchange for a release of claims and liability.
- Provide appropriate unemployment documentation at the time of termination.
- Discuss termination protocol when terminating remotely versus an in-person termination.
- Determine how a worksite employee will obtain personal items previously left in the workplace.

Health and Wellness Benefits

- Remind worksite employees the Employee Assistance Plan is available for confidential counseling.

3 Reopening the Workplace

Employee Screening

- Develop a protocol for screening or monitoring employees coming into the workplace.
 - Require employees experiencing **COVID-19 symptoms** to leave work.
 - Encourage employees to stay home when feeling sick or experiencing symptoms of COVID-19.
- Develop procedures that encourage employees to self-monitor for symptoms of COVID-19 and to report when they are sick or experiencing symptoms of COVID-19.
- Ensure that any tests administered are accurate and reliable. Check CDC or FDA guidance to keep informed in this rapidly changing area.
- Keep in mind that screens are medical exams that must be conducted in a confidential way and the results need to be maintained in a separated medical file.
- Provide appropriate PPE and training on proper PPE use to employees administering screens or tests.

Performance Management

- Establish and communicate new or updated company priorities to ensure leadership alignment.
- Review and update job descriptions as worksite employees' roles may have changed.
- Review goals and metrics.
 - Have goals or metrics changed based on remote work force?
 - Do adjustments need to be made?
- Evaluate performance review periods.
 - Do review periods need to be adjusted?
 - Will reviews be conducted remotely instead of in person?

Training

- Ensure managers and worksite employees receive compliance training preventing harassment and discrimination in the workplace.
- Review the onboarding process and trainings for new worksite employees to address any new processes, benefits or policies.
- Review information technology security protocols to support a remote work environment and ensure worksite employees receive applicable training.

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