



WYOMING MONTANA SAFETY COUNCIL

COVID-19 Return-to-Work Safely: Basic Framework Elements for Non-Medical* Wyoming Businesses

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Goal: To provide a framework or checkpoints for a business or other organization to use to help prevent further spread of COVID-19 as Wyoming moves toward increasing personal, business and community activity.

Note: These recommendations are intended to provide a cross check on practices for gap identification with full recognition that many of these elements are already known and in use. The goal is to provide a functional workplace that limits exposure and spread of COVID-19 illness as much as possible among workers and the community served.

Recommendations for success:

1. Know your Exposure Potential and Risks - All planning and actions should begin with a risk assessment based on the type of human interactions present. Assess your operations for places people come into contact with people and COVID-19 could be transmitted.

Resource:

OSHA COVID-19 Risk Assessment: <https://www.osha.gov/Publications/OSHA3993.pdf>

Examples of exposure potential by Risk Category: (Risk will vary based on ability to distance)

Example for Low to Medium Risk – Manufacturing, warehousing, “Internalized” government services- largely self-enclosed, managed and manageable interfaces between workers and others.

Example for Medium to High Risk – Retail, personal services/treatment at fixed location (stores, salons, clinics, body art shops) – multiple person-to-person interfaces, both at some distance and/or at very close distances.

Example for Medium Risk – Mobile direct services (landscaping, home repair, cabs, ride share, home delivery) – single or limited personal interaction/contact in environments ranging from very open to very closed.

Example for High Risk – Gathering places (education centers, churches, care homes, mass transit, parks, entertainment) – potential for large numbers of people gathering or gathered in close proximity for sustained periods of time.



The four exposure risk levels represent probable distribution of risk.

2. Know your Situation - Review services/sectors/workplaces in operation for successes and gaps. Look again at exposure potential and upgrade or downgrade existing guidance and recommended practices to ensure actual practices address the exposure potential (occurring or possible). Develop, implement and train staff on your company's specific Infectious Disease Preparedness and Response Plan.

Resources:

OSHA Guidance for Preparing Workplaces for COVID-19:

<https://www.osha.gov/Publications/OSHA3990.pdf>

* Medical, laboratory and health care establishments may have additional exposure, reporting and staffing concerns not covered by this framework. Please refer to the Wyoming Department of Health and the U.S. Centers for Disease Control and Prevention for more guidance.

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Center for Disease Control and Prevention, Resources for Businesses and Employers:
<https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/businesses-employers.html>

https://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html?deliveryName=USCDC_10_4-DM27264

State of Wyoming COVID-19 Guidance for Employee Screening

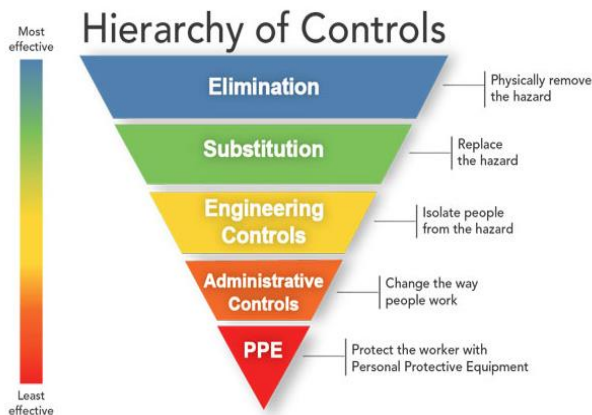
<https://health.wyo.gov/wp-content/uploads/2020/04/WDH-Guidance-for-Employee-Screening-April-30.pdf>

Example: The meat packing industry has been deemed essential, has been operating and has shown infectious disease transmission. This sector is currently under inspection and review to improve practices. This same process should occur in all currently operating workplaces, including health care.

3. Remind yourself of your Exposure Experience – Sectors (essential services and other) with

experience and practice with infectious diseases, gained prior to or during the COVID-19 pandemic period, should be used to assess to identify measures and practices that have a) worked to prevent infection, b) are routinely used in other sectors that are not operating but could be, and c) can be transferred to other sectors, including essential service sectors that need additional infection prevention. Evaluate and implement the hierarchy of Controls

(<https://www.cdc.gov/niosh/topics/hierarchy/default.html>) for your business and review and update your plan with industry specific guidance applicable to your business.



Example: Are there practices from operations like yours that can be applied to your situation?

4. Have a Re-Shutdown Plan – A plan to (re)implement restrictions on operations/human contacts, including infectious disease occurrence criteria and action triggers, must be an integral part of any plan to re-start operations. This is especially true in the event of a workplace outbreak of COVID-19. Businesses may need to act quickly to help contain the spread of illness among their workforce.

5. Know Compliance – Check with local, county, state and federal regulatory agencies to ensure you are in compliance with all orders and guidance, including state and county public health orders. Remember, during these ever-changing times, these orders are fluid and are updated regularly. Be sure you are checking frequently.

Resources:

State of Wyoming, COVID-19 Resource and Executive Orders: <https://covid19.wyo.gov/>

Personal Protective Equipment (PPE) Burn Rate Calculator - https://www.cdc.gov/niosh/ppe/ppeapp.html?deliveryName=USCDC_10_4-DM27264

6. Go Beyond Compliance – Just as beyond compliance thinking in a safety program leads to a culture of prevention, thinking beyond compliance on infectious disease will protect your employees and company at work and at home. Any business exemption to public health orders must be addressed with the State or local health authorities.

Focused on safety and in service to the citizens of Wyoming, this document was created in partnership with the State of Wyoming Department of Workforce Services and Wyoming OSHA Division including contributions from Meredith Towle, Wyoming State Occupational Epidemiologist.

Factors to consider in re-opening by potential exposure risk category:

Example for Low to Medium Risk Industries

Manufacturing, warehousing, "Internalized" government services, office and administrative functions, non-retail operations - largely self-enclosed, managed and manageable workplaces/interfaces between people. Some of these services have been classified as essential and have been operating.

Situation Review

- If operating, conduct audit of COVID-19 disease patterns and use/compliance with recommended practices and guidelines to determine necessary remedial actions.

Physical/Biological

Pre-return disinfection and re-infection prevention

- Facility
- Fleet
- External points of contact (i.e. clients, suppliers)
- Employee equipment and personal wear
- Home and other regular employee contact point
- PPE use recommendations – scaled by risk
- Shift / employee arrival modifications

Facility Re-start / return to normal operations

- Conventional facility restart safety audits (normal operational safety)
- Integration of social distancing elements/plan
- Employee re-orientation (consider "new" employee style reorientation for all on expected practices)
- Returning employee integration with staff who have been working
- Safety process changes/updates (opportunity to go beyond compliance)
- Visitor/Supplier/Delivery protocols
- Re-shutdown protocols due to infection reemergence

Employment/HR

- Have regular, open communication with staff and customer using signage, email, etc.
- Clarify/review individual's employment status as needed based on status during COVID-19 emergency period (working, working in extended or hazard status,

working from home, not working, change in hours, change in pay)

- Review infection detection/reporting/associated actions protocols for COVID-19. These may vary from protocols used in regular work environment.
- Maintain up-to-date records of employee attendance by location and with contact information, which will be needed in the event of a workplace COVID-19 outbreak.
- Review workers compensation/retirement implications during COVID-19 shut down and continuing
- Assess leave/PTO interface both during and following shut down period
- Review work from home policies to potentially accommodate experience during COVID-19

Emotional/Mental Health Support

- End-of-shutdown support system (preparing employees for return to work, return to school, leaving the relative safety of quarantine)
- Return to work support – reestablishing schedules, dealing with backlog stress, day care and after school care changes, aging family member care changes
- Financial counseling/support – shut down related financial stress management, employee financial support
- Substance use counseling/support
- Fatigue and mental health support
- Interruption of routine medical services support (eg. medicines, specialists, routine care)

Leadership

- Top leadership presence and ongoing communication supporting all of the above.

Example for Medium to High Risk Industries

Retail, personal services/treatment at fixed location (stores, salons, clinics, body art shops) – multiple person-to-person interfaces, both at some distance and/or at very close distances.

NOTE – All the elements of the **Low to Medium Risk** category apply in addition to the areas of emphasis noted below under the risk factor areas. A significant portion of **Medium Risk** sectors/services are NOT operating and have different re-start challenges.

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- Shift / employee arrival modifications

Facility Re-start / return to normal operations

⇒ Additional focus on restarting safely AND a very different customer/visitor interaction environment requiring attention to employee numbers and spacing, customer numbers and spacing and PPE challenges.

- Conventional facility restart safety audits (normal operational safety)
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Example for Medium Risk Industries

Mobile direct services (landscaping, home repair, cabs, ride share, home delivery) – single or limited personal interaction/contact in environments ranging from very open to very closed.

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- Shift / employee arrival modifications at staging points or main operations centers

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Example for High Risk Industries

Gathering places (education centers, churches, care homes, mass transit, parks, entertainment) – potential for large numbers of people gathering or gathered in close proximity for sustained periods of time.

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ADDITIONAL RESOURCES AND REFERENCES

Federal:

<https://www.whitehouse.gov/openingamerica/>
<https://www.fda.gov/emergency-preparedness-and-response/counterterrorism-and-emerging-threats/coronavirus-disease-2019-covid-19>
<https://www.natlawreview.com/article/plan-now-bringing-back-your-work-force>

Federal – Centers for Disease Control (CDC)

<https://www.cdc.gov/coronavirus/2019-nCoV/index.html>
https://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html?deliveryName=USCDC_10_4-DM27264
<https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/steps-when-sick.html>

Federal – OSHA

<https://www.osha.gov/SLTC/covid-19>

For Specific Industries:

Construction - <https://www.osha.gov/Publications/OSHA4000.pdf>
Restaurants - <https://www.osha.gov/Publications/OSHA4017.pdf>
Meat Processing – <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/meat-poultry-processing-workers-employers.html>

State of Wyoming:

<https://covid19.wyo.gov/>
<https://drive.google.com/file/d/1cbsfIjNr3b-jBWwSo194OdW9H1JspUC/view>
<http://deq.wyoming.gov/covid-19/>
<https://health.wyo.gov/publichealth/infectious-disease-epidemiology-unit/disease/novel-coronavirus/covid-19-orders-and-guidance/>

State of Wyoming – Department of Health

<https://health.wyo.gov/publichealth/infectious-disease-epidemiology-unit/disease/novel-coronavirus/>
<https://health.wyo.gov/wp-content/uploads/2020/04/WDH-Guidance-for-Employee-Screening-April-30.pdf>

State of Wyoming – OSHA Division

<http://www.wyomingworkforce.org/businesses/osha/>

State of Wyoming – Department of Workforce Services

<http://wyomingworkforce.org/covid19-resources/>
<http://www.wyomingworkforce.org/docs/wc/RTW-Handbook.pdf>
<http://wyomingworkforce.org/news/>

GENERAL GUIDELINES AND RESOURCES:

HAND WASHING

<https://www.cdc.gov/handwashing/when-how-handwashing.html>
<https://www.cdc.gov/handwashing/index.html>
<https://youtu.be/d914EnpU4Fo>

RESPIRATORY ETIQUETTE: COVER YOUR COUGH/SNEEZE

<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html>

https://www.cdc.gov/healthywater/hygiene/etiquette/coughing_sneezing.html

SOCIAL DISTANCING

<https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>

HOUSEKEEPING

<https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>

<https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/disinfecting-your-home.html>

<https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2>

<https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/cleaning-disinfection.html>

REOPENING GUIDANCE FOR CLEANING AND DISINFECTING

https://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html?deliveryName=USCDC_10_4-DM27264

EMPLOYEES EXHIBITING SIGNS AND SYMPTOMS OF COVID-10

<https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/steps-when-sick.html>

<https://www.cdc.gov/coronavirus/2019-ncov/community/general-business-faq.html>

TRAINING

<https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-small-business.html>

<https://www.osha.gov/Publications/OSHA3990.pdf>

OTHER RESOURCE LINKS:

National Safety Council

<https://www.nsc.org/work-safety/safety-topics/coronavirus>

<https://www.nsc.org/work-safety/safety-topics/safe-actions-for-employee-returns-safer>

https://www.nsc.org/Portals/0/Documents/NSCDocuments_Advocacy/Safety%20at%20Work/covid-19/SAFER%20Framework%20Summary050620.pdf?ver=2020-05-06-162456-463&utm_campaign=NSC%20524850&utm_medium=email&hsmi=87605506&hsenc=p2ANqtz--TvLrqH1aE9pzOq1_7HqncRG-GJX7RDml0NdN3YPESTa01nba7Bw6e7LxYrV8GYSPRpTjz&utm_content=87605506&utm_source=hs_email

https://www.nsc.org/Portals/0/Documents/NSCDocuments_Advocacy/Safety%20at%20Work/covid-19/SAFER%20Framework%20Summary050620.pdf?ver=2020-05-06-162456-463&utm_campaign=NSC%20524850&utm_medium=email&hsmi=87605506&hsenc=p2ANqtz--TvLrqH1aE9pzOq1_7HqncRG-GJX7RDml0NdN3YPESTa01nba7Bw6e7LxYrV8GYSPRpTjz&utm_content=87605506&utm_source=hs_email

https://www.nsc.org/Portals/0/Documents/NSCDocuments_Advocacy/Safety%20at%20Work/covid-19/SAFER%20Framework%20Summary050620.pdf?ver=2020-05-06-162456-463&utm_campaign=NSC%20524850&utm_medium=email&hsmi=87605506&hsenc=p2ANqtz--TvLrqH1aE9pzOq1_7HqncRG-GJX7RDml0NdN3YPESTa01nba7Bw6e7LxYrV8GYSPRpTjz&utm_content=87605506&utm_source=hs_email

Wyoming Montana Safety Council - <https://www.wymt.org>