**Re-Opening/Return to Office Checklist**

Certain industries (healthcare, congregate living, meatpacking plants, etc.) have additional (or stricter) regulations. Always check with your industry employer group, federal and state OSHA plans, state and local orders and local health departments to determine additional requirements. This checklist is for general industry employers in South Carolina and North Carolina (Virginia has a state OSHA plan which may have additional requirements.)

**Work from Home or Furlough Period:**

During the work from home or furlough period, certain actions will help to ease the transition for employees as the organization considers returning to the workplace:

* The education of employees related to testing, face coverings, hand washing, social distancing, etc.
* Taking the pulse of employees related to their comfort with returning to work, wearing face coverings, etc.
* Interactive discussions with employees about the company’s thoughts about eventual return-to-work.

This type of communication encourages transparency and trust from your staff. You are more likely to receive honest feedback and understand hidden obstacles to successful re-opening. If you have not been doing these things up to this point, consider starting the process now, even if it means pushing back the return by a few weeks. Rushed re-openings can negatively impact employee morale.

**Activities to Prepare for the Transition to the Office:**

* **Meet Regularly**

If you do not already have a re-opening team in place, put one together and meet regularly. This team should include representatives from key areas in your organization that will be affected by or have to participate in the re-opening (finance, payroll, facilities, human resources, and heads of business divisions). Often there will need to be follow-up and clarification from managers of teams as well.

* **Education**

During the quarantine period, you should continue to educate staff to help them make informed opinions about face coverings, vaccination, etc. Many staff receive information from illegitimate online sources and social media postings. As the employer, determine what message you feel employees need to hear and clearly and simply communicate it at each meeting and through email/social media on a regular basis.

**TIPS**:

* Do not demonize one point of view or another in your communications.
* Educate staff and supervisors about respecting others’ opinions and decisions about their family’s health.
* Provide only sources that can educate respectfully with vetted studies and information.
* Remind staff that they should review the source of news they receive. [www.snopes.com](http://www.snopes.com) is a useful site to determine whether news is accurate or not.
* Consider asking leadership staff (if they choose to be vaccinated) to send out an email to the employees to celebrate their vaccination. It can be helpful to provide templates and remind leadership to keep the message positive. The CDC has also suggested appointing vaccine advocates among your employees; however, this can be difficult ground since employees may lack education on the virus.
* Consider some form of employee promotion for vaccination (getting their picture taken with an “I got vaccinated” banner), but make sure it is voluntary, with no pressure for the employee to “put out” their vaccination information.
* An alternative, anonymous, reporting system would be to survey employees periodically and communicate the total number of vaccinated staff.
* Some communication resources that may be helpful:
  + <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/index.html> (CDC General Vaccine Information)
  + <https://www.cdc.gov/coronavirus/2019-ncov/communication/index.html> (CDC Communication Tools for Business)
  + Provide links to vaccination scheduling sites.
* **Assess Employee Opinions**

It is tempting to guess at the overall mindset of your employees, but often your beliefs are based off the more vocal employees or inferred from other sources. Without employee feedback, you will likely make some wrong moves as you return them to the worksite. These are some of the questions you may want answered:

* Are employees vaccinated/intending to be vaccinated? If not, why not?
* Do employees prefer work-from-home, hybrid or work from office?
* What changes made during COVID do employees hope to see continue?
* What changes made during COVID do employees hope to see end?
* Are employees comfortable returning to the office?
* Are there any safety concerns employees would like to see addressed?
* Are employees comfortable with wearing a face covering?

You can work with Catapult or conduct a survey on your own. Other options are focus groups, or for smaller settings, just calling staff individually. However, in most workplaces, we would strongly suggest keeping surveys anonymous. If not anonymous, consult with Catapult first.

While asking directly if someone is vaccinated is not considered a medical inquiry (if you are not directly involved in the vaccination process and therefore potentially privy to additional medical questions related to the vaccine), from an EEOC perspective, asking the question should be based on a valid and serious safety concern. That safety concern might not apply in the case of an office where all staff are wearing face covering or working in private offices, for example. In addition, non-anonymous surveys can bring up ADA and religious information. Vaccination status is private medical information under the ADA and generally should be kept confidential as other medical records.

* **Assess Facilities**
* If your building was completely shut down for a long period, review this guidance: <https://www.cdc.gov/coronavirus/2019-ncov/php/building-water-system.html> from the CDC. There are molds and diseases which can be harbored in a building where ventilation or water systems have been unused for extended periods of time. Have your service vendors scheduled to review your site.
* The CDC offers guidance on assessing and bettering the ventilation alternatives within your facility to ensure appropriate air flow. Air flow is one of the keys to the spread of COVID-19. Good ventilation methods will reduce risk: <https://www.cdc.gov/coronavirus/2019-ncov/community/ventilation.html>. Have your service vendors scheduled to review your site.
* Consider ongoing and enhanced cleaning schedules. While COVID-19 is generally spread through respirations, there is a chance of spread through contact. In addition, enhanced cleaning is clearly necessary to prevent spread of flu and other viruses. Reducing virus spread overall will help to avoid the stress of worrying about COVID-19 when an employee may have contracted another cold or virus.

On top of these considerations, employees themselves will view the cleaning as protective. This link may be helpful: <https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>

* Make yourself familiar with CDC guidance on cleaning facilities after COVID exposure. Supplies or vendors will have to be put in place before a COVID-19 exposure actually occurs: <https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>
* If social distancing and face coverings are recommended at the time of your re-opening, considering whether barriers may be needed, cubicles alternated, or break rooms altered (removing chairs, etc.) to ensure appropriate distancing is maintained. This should be a common-sense process based on an assessment of risks.
* What type of signage will you need to encourage and enforce distancing and face coverings in common areas if required when you re-open? (The safety plan that is referenced later in this document provides some additional resources.)
* **Assess Work Schedules/Structuring**
* Is social distancing really possible with a full return of staff? Consider restrooms, breaks, copy rooms, clock-in locations, lunches and other common areas.
* If full return is not advisable, are there certain positions that would benefit more from being in an office space?
* Should you alternate shifts, breaks, lunches or work schedules to reduce occupancy?
* Would a hybrid option help to reduce occupancy and promote social distancing?
* Consider if you should close smaller conference rooms or set up usage rules.
* If you have time clocks or other “waiting areas” you will likely need floor tape, signs, etc. to indicate waiting distance.
* If you are making decisions related to requiring return-to-work remember that such decisions should be made based on business considerations. Any preferential treatment of one employee versus another could be perceived as discriminatory. Age, disability status and pregnancy are not reasons to decide someone should not work from the office if they are interested in doing so. Those discussions should be encouraged, but should be initiated by employees, not the company.
* Will you continue to permit or require remote work? If so, consider the need for any additions or adjustments to your Telecommuting Policy.
* If staff have been working in states where they do not normally work, and where you may not have an office, consider the potential ramifications of this remote work and whether you are comfortable with the requirements on your part:
  + Certain newer COVID related regulations are state specific, to include leave. Be sure you understand requirements.
  + You may have to register/license your business in the state.
  + You will likely need to withhold income tax in the state where they live/work and understand any current remote worker tax rules for that area. Your payroll service should be helpful.
  + You will need to withhold unemployment taxes in the state where they work.
  + You will have to therefore have to register with the state and potentially local tax agency.
  + Some states have state disability programs that you will need to contribute to.
  + Be sure your Workers’ Compensation coverage takes care of your remote worker.
  + Some cities may require home occupation permits for those working from home. Check “home occupation permit” and the city online.
  + Make sure you post all required posters as best you can for the employee (could be online or mailed/emailed to employee if no other option)
  + Remember to report new hires as you would in any state.
  + Review other state laws by using Catapult’s state laws tool for members, or call Catapult for assistance.
* **Reinstatement after Lay-Off, Furlough or Separation:**
* If returning some, but not all employees, consider that your reinstatement decisions should be made in the same way as your lay-off decisions. There should be clear business justification (hire date/job, etc.). Please review Catapult’s FAQ on lay-offs and reductions in force during COVID which includes assistance in the best way to make decisions related to lay-off/return and with sample letters both for lay-offs and return to work.
* If benefits, PTO or other benefits were altered during a furlough, lay-off or separation period, it is important to begin work with your broker. What happens when employees return? What waiting periods will now apply? When will benefit deductions need to begin? Will they need to fill out new paperwork for benefits? Please review Catapult’s FAQ on lay-offs and reductions in force during COVID which includes a review of potential benefits issues. Remember that with paid tiem off or vacation in North Carolina, you are generally permitted (as long as the change is communicated in advance) to adjust PTO rules, as long as you do not negatively impact already accrued time off.
* If this separation was for a long period or was permanent, you will also need to consider:
  + Is a rehire process necessary? (YES if the employee was permanently separated – to include I-9 or using section 3 of the I-9 for the rehire).
  + Which reinstatement forms will you require? For example: address and phone confirmation, new tax forms, etc.
  + Will you require new background checks and drug tests? Remember that all release and notification forms will be required just as they are pre-hire.
* Revisit any policies (telecommuting, etc.) that were put in place over this period which may need to be adjusted.
* Talk with the payroll department. Use sample employees to work through the process. Which benefits, garnishments, etc. will need to be reactivated and what does the process look like? How difficult will this be if everyone returns at the same time?
* If this return is following a lay-off where employee benefits ended, begin work with your broker. What happens when employees return? What waiting periods will now apply? When will benefit deductions need to begin? Will they need to fill out new paperwork for benefits?
* Have you discussed what type of leave benefits you will be offering in the case of vaccination, contact, illness or diagnosis? If you are considering leave under the FFCRA expansion, it will be important to fully understand the process and provide notification to employees. Catapult has policies and forms if you need them.
* **Review Business /Management Needs and Expectations**
* Is your executive team or your management team adamantly opposed to continuing to permit work from home?
* Are there certain positions or people which have proven to have low productivity at home?
* As the business climate changes, will certain positions or people likely need to be in the office to be productive (for example, a receptionist might work from home if clients were not permitted in the office, but may be required as an in-office staff once they are.)
* How difficult/costly is it to bring your office set-up to a safe level of operation? (For example, at this time if ventilation is poor and social distancing is not possible in the office, these need to be addressed in some way. In the future, however, should cases decline to a certain level, it may be possible to have employees in closer settings.)
* If bringing employees back into the office, there could be a higher risk of quarantine requirements impacting multiple team members. Will this cause issues, or can they easily quarantine and work from home if needed?
* Will new leave programs be needed? It is advisable to have leave programs to prevent staff from having to be penalized for taking time off for vaccinations or for following quarantine or isolation orders.
* What are the time constraints: How long would cleaning the office, having the ventilation system restarted/checked, adding barriers, etc. take if necessary?
* Ensure there is a process in place to allow (at minimum) for ADA and Religious accommodations for those who have concerns about wearing a face covering.
* Ensure there is a process in place to allow (at minimum) for ADA accommodations for those not able to work from the office.
* **Analyze Options and Obstacles**

1. **Review the survey or other feedback information.** Consider whether you may need to have a follow-up focus group to clarify certain areas, bearing in mind that it is best to limit your conversation to areas that will not solicit ADA/religious information.
   * Are staff anxious about returning?
   * Are most staff vaccinated or planning to be?
   * Are there staff who would strongly prefer to continue working from home?
   * Are staff opposed to wearing face coverings?
   * Do staff have concerns about returning if others are not vaccinated?
   * What other issues did staff bring up?
   * What are staff’s thoughts on ongoing remote work? How important is it to them?
   * If considering alternate schedules, hybrid work or areas that were not assessed on the initial survey, consider follow-up calls, focus groups or additional surveys to discuss ongoing concerns. Do not guess at employee attitudes.
2. **Review business considerations, facilities, staffing and work schedule obstacles.**
   * If you are considering a rigid: “everyone return” approach, consider:
     1. Is this approach based on logic and current research or is it based on feelings about professional standards or on an inability to release control over staff’s work?
     2. If you have concerns about productivity for remote employees, are you not able to address those in alternate ways (by coaching and if things do not improve, requiring employees who are not productive at home to return to the worksite, as an example)?
     3. If so, is this a good time to prepare managers (using Catapult or other training) for how to have productive discussions about behaviors and work performance and how to document such concern?
     4. Are you penalizing good staff and affecting morale or recruitment flexibility simply to address a problem employee who should be managed out of the company?
   * Are you willing to lose some staff if you are not willing to be flexible? There are a large number of flexible positions now available and are likely to lose staff to those other companies gradually (and sometimes immediately) if you mandate work from the office full-time again.
   * Are you willing to miss out on hiring candidates? Candidates with multiple offers may choose a position which is more flexible and permits work from home.
   * Are your facilities prepared for return? If not, how long will it take to prepare them?
   * Will work scheduling/shift solutions be acceptable from a morale, facilities, safety and security standpoint?
   * Do you have a viable solution to the need for more frequent cleaning or cleaning after an exposure?
   * Do you have a plan for how to assess employee symptoms and when to send home for close contact? Catapult’s safety program, linked in section below, as well as this [document](https://letscatapult.org/evaluating-covid-19-contacts-and-cases/) may be helpful.
   * If you are considering temperature checks and health questionnaires and do not wish to have staff self-monitor, will you be able to appropriately handle this with current staff without having ADA confidentiality issues with paperwork or employees overhearing potential medical discussions?
   * Do you have a staff member who is willing and able to make decisions on whether employees may or may not enter the workplace, what symptoms may result in a mandatory test, etc.?
   * **If you are considering incentivizing or mandating vaccinations, please see our** [**Vaccination Planning Tool**](https://letscatapult.org/vaccination-planning-tool/) **to be educated with the risks associated.** Catapult also has policies and forms for supporting your vaccination plan – you can find those on our general website: [www.letscatapult.org](http://www.letscatapult.org)

* **Put your Plan in Place**

1. **Review the** [**Safety Program**](https://letscatapult.org/safety-program-temperature-questionnaire-tools-incident-response-template/) **at Catapult’s site as well as CDC/OSHA information.**
2. **Using the Safety Program as a guide, make sure you feel all areas important to your organization have been addressed.** You can make your program as short or as long as necessary for your particular company size.
3. **Consider creating a** [**brief plan**](https://letscatapult.org/covid-business-practices-short-policy/) **that is more understandable to staff related to changing requirements.**
4. **Create a Preliminary Timeline to Include Action Items (assign to specific staff).** As an example, if you have a return-to-work preliminary goal of X date, you should assign broker research on benefit options to an HR staff member and this should be discussed in follow-up meetings. If there are concerns to be addressed, those should be assigned as discussion or action items as well.
5. **Employee Feedback, Communication and Education.** Don’t forget that employee communication is one of the most important pieces of your timeline. The materials should be crafted carefully and reviewed by the team as a whole if they are important. You should assign communications to specific staff members and set deadlines. (For example, the manager might provide certain information and the HR staff details on benefits and safety practices). Your communication plan should consider:
   * How and when will each communication happen? Letters or emails are not good for “brand new” information that may not be seen positively. Introduce sensitive information through video or phone. Introduce the topic, let them know a detailed email will follow and schedule a follow-up meeting or call to discuss questions or concerns.
   * A heads up to managers first, reminding them that:
     1. They should not be inquiring about or discussing vaccine status, ADA situations, Religious beliefs, face covering concerns directly with the employees. For ADA and religious situations, HR should be involved.
     2. They may have suggestions for other options in the return which should be addressed to leadership – not staff. It is important that they are respectful of the company’s position with staff, encouraging compliance and respectful discussions from employees.

Communication plans will likely need to include:

* + Requesting continuing feedback from staff on areas of concern or uncertainty
  + Education resources for staff to help them understand risk mitigation practices and the benefits of vaccination/face coverings, for example.
  + Hints and updates on the potential timeline well ahead of the plan dates.
  + Safety and policy information requirements for staff who will be returning (will they be required to have temperature checks; will they need to stagger shifts, etc.)
  + Benefits information.
  + ADA and accommodation information.
  + Options for discussing concerns with HR.
  + Resources for staff on mental health – from an Employee Assistance Program, as an example.

1. **Manager Training:** Remember that as with any larger scale initiative, its success begins and ends with your leaders and supervisors. They should have clear instructions on how to handle:
   * Basic change management (not everyone welcomes change; take it slow/get feedback)
   * Staff conflict over political/religious beliefs.
   * Discussions that verge on overly personal related to medical conditions.
   * Employees with symptoms before, at or after work.
   * Remote work and other requests for alternative work schedules.
   * When and if leave may apply and when to contact HR.
   * How to make sure remote staff still feel integrated into the team.
   * How to reignite staff’s passion and commitment as work picks up or changes.
2. **Follow-Up:** Remember that as with any large change, there will be unanticipated consequences. Do follow up meetings and surveys with staff and continue to meet as a team to adjust and address.

**Note:** Review state laws for state-specific provisions.

Written by a Catapult Advisor.