**COVID-19 Safe Operations Checklist**

As the country, states, and local municipalities move into the next phase of the COVID-19 battle, some state Shelter-in-Place Orders are being lifted with more being lifted over the next month, printing operations need to turn their attention to ensuring they maintain safe operations and can bring additional staff back to work. Many printing operations have been running with reduced staffing with many employees either working from home, working less hours, or been temporarily laid off.

The following checklist highlights some of the many factors that printing operations should consider:

**1. Government Orders**

Monitor the applicable re-opening orders and industry-specific requirements to determine the appropriate time frame for returning to work and conditions that need to be met. For example, many of the orders are requiring employees to wear face coverings and some are requiring daily temperature checks of employees.

**2. Health and Safety**

Conduct a COVID-19 risk assessment at each worksite and create or refine an existing mitigation plan identifying exposure risks. The risk assessment needs to consider how employees will interact with each other during the day as well as visitors and delivery personnel.

The actions to consider include social distancing measures such as physical modifications to the worksite, revised work practices, reducing workforce density, and employee training on appropriate interactions, worksite cleaning and disinfection procedures, protective coverings and personal hygiene requirements or recommendations, health screening protocols for employees and visitors, and protocols for addressing COVID-19 cases.

**3. Social Distancing Actions**

The current recommendations by the Centers for Disease Control and other government agencies is to keep people 6 feet apart to help prevent the spread of the virus. The following are some suggested approaches to achieving and maintaining the recommendation:

* Stagger start times for employees to prevent interaction and congregation as they report to and leave the facility.
* For certain staff, consider alternating schedules for either being on-site or teleworking.
* 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.
* Close lunchrooms or stagger lunch and break times and remove chairs and tape off areas to ensure employees can sit at least six feet apart.
* Remove chairs from conference rooms to limit attendance at meetings and ensure employees can sit at least six feet apart.
* Create a buffer between scheduled meetings in conference or meeting rooms to avoid overlap between two groups and to allow time for cleanings.
* Install social distancing decals on the floors of any shared spaces in the workplace to keep people six feet apart.
* Place physical markers or decals in high traffic areas to keep people six feet apart.
* Post social distancing reminders throughout the workplace.
* Post signs reminding employees to not touch their face, particularly eyes, nose, and mouth with their hands.
* Post signs to limit the number of people allowed in common rooms and spaces at a given time such as bathrooms, conference rooms, dining areas, elevators, etc.
* Post signs directing the flow of traffic in tight high-traffic areas to indicate one-way travel.
* Close certain stalls, urinals, and sinks in the restroom to create adequate distance between individuals.
* Designate one person to clock employees in and out of work or record their arrival and departure times if clocking in would otherwise require employees to be in close contact with each other or to touch the same equipment.
* Encouraging employees with their own offices to stay in their offices as much as possible.
* If possible, restructure open floor layouts to ensure that employees can work at least six feet away from each other. If not possible, consider installing physical barriers to prevent employees from contacting each other.
* If possible, increase air exchange rate in the building,
* Install barriers between workspaces, in reception areas, or between customers and employees that can be easily cleaned and are high enough to prevent contact.
* Adopt videoconference guidelines or install video phones so that even when in the office, employees are discouraged from meeting in person.
* Discourage and train employees to not engage in handshakes or other forms of physical contact.
* Eliminate nonessential business travel, especially to locations with ongoing COVID-19 outbreaks, as identified by CDC travel warnings and other government and public health authorities.
* Limit out-of-office business meetings and travel to only essential purposes and train employees to practice measures to prevent contamination such no handshaking, social distancing, washing hands or using hand sanitizer and wearing a face cover.
* Limit one person to a vehicle, if possible.
* Have products and supplies delivered through curbside pick-up or delivery.

**4. Sanitation and Social Distancing Measures**

To minimize the risk of COVID-19 transmission, certain good hygiene and infection control practices are being recommended by the [Centers for Disease Control](https://www.cdc.gov/coronavirus/2019-ncov/index.html) and the [Occupational Safety and Health Administration](https://www.osha.gov/SLTC/covid-19/) (OSHA). The [U.S. Environmental Protection Agency](https://www.epa.gov/coronavirus) (EPA) has issued guidance on disinfectants for use against COVID-19, and the CDC has issued guidance on cleaning and disinfecting workplaces, which employers should follow.

For any employee expected to use cleaners and disinfectants, they need to be trained under OSHA’s Hazard Communication Standard and Personal Protective Equipment Standard in the hazards associated with the chemicals and how to properly use the designated personal protective equipment. Document all training and other instructions provided to each employee.

SGIA has also created a [sanitation guide](https://www.piworld.com/wp-content/uploads/sites/2/2020/03/SGIA_covid19_sanitation_guide1.pdf?x93368) based on the CDC recommendations. The sanitation guide provides additional information on cleaning and sanitizing the workplace.

These measures include:

* Promoting frequent hand washing [20-second hand-washing rule](https://www.cdc.gov/handwashing/when-how-handwashing.html) and making soap and running water readily available.
* Provide hand sanitizer at strategic locations around the facility.
* Provide training to encouraging employees to cover their coughs and sneezes.
* Provide tissues and no-touch disposal receptacles.
* Require workers to stay home when they are ill or have been exposed.
* Do not allow employees to share personal work equipment, if feasible, such as desks, phones, headsets (or any other equipment that will touch the face), computers, and work tools, and clean and disinfect such items that are shared.
* Have employees or other personal conduct routine and careful cleaning and disinfecting of work surfaces, equipment, and work areas.
* Have employees disinfect common surfaces following use as such as microwaves, vending machines, refrigerator handles.
* Implement routine and careful cleaning and disinfecting of frequently touches surfaces such as including drinking fountains, elevator buttons, doorknobs, light switches, handrails, kitchen and breakroom or lunchroom appliances, coffee pots, counter tops, drawer pulls, tables, sinks, faucets, toilet handles, push plates, phones, keys, remote controls, desks, chairs, printers, keyboards, computer mice and thermostats.
* Where feasible, prop open all doors to minimize the touching of door handles, knobs, and push plates. When not feasible, provide paper towels or other similar wipes and a waste container to allow the doors to be opened or closed without out contacting the handle.
* Consider installing automatic doors and lights to minimize touching of these common surfaces.
* Consider suspending or reconfiguring security practices that require touching frequently touched surfaces, such as PIN-entry devices, thumbprint scanners, time clock stations, and in sign-in books.
* Consider implementing screening protocol for visitors to identify COVID-19 symptoms or exposure, such as temperature checks or targeted inquiries.

5. Personnel Issues

Due to declaration of a coronavirus pandemic, employers are provided greater leeway under the regulations and permitted to make certain medical inquiries which would otherwise be impermissible. The U.S. [Equal Employment Opportunity Commission](https://www.eeoc.gov/coronavirus/) (EEOC) have issued guidance allowing employers to take employees’ temperatures, send employees with coronavirus symptoms home, ask employees if they are experiencing symptoms of coronavirus, and ask employees why they are taking sick leave.

The EEOC issued additional guidance allowing employers to test employees for COVID-19 before allowing them to return to work. While employers may also require a note certifying fitness for duty in order to return to work, the EEOC cautions that many medical offices are overloaded and employees may have difficulty obtaining the notes so flexibility for this request may be required.

* Require any employee that is exhibiting symptoms of COVID-19 or has been diagnosed with COVID-19 in the past 14 days, or is to continue to work from home or take leave until the employee qualifies to return to work.
* Because printing operations have been designated as an essential business, if an employee has been exposed to COVID-19 and is asymptomatic, the company can follow [the CDC guidance for safety practices for critical infrastructure workers](https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html).
* 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 isolated for at least 24 hours and be cleaned immediately.
* Consider screening daily all employees for respiratory and other symptoms such a temperature. **(Some states and local municipalities are requiring temperature screening of essential workers, such as those in printing operations.)** Unless the temperature of employees can be performed discreetly, temperature screenings need to take place in a private room and that the recording of temperatures is treated as a confidential medical record under the ADA. If an employer cannot find an infrared/forehead thermometer, it may require employees to take their temperatures at home and attest that they do not have any fever or elevated temperature.
* Employers may also require and administer COVID-19 testing to employees, however the limited availability of tests may make this difficult to accomplish.
* Consider requiring employees to wear face coverings. **(Some states and local municipalities are requiring essential workers, such as those in printing operations, to wear face coverings.)** The EEOC issued guidance stating that an employer may require employees to wear protective gear (e.g., masks and gloves) and observe infection control practices (e.g., regular hand washing and social distancing protocols). If masks and face coverings are required, they need to be provided by the employer. Masks and face coverings are regulated by OSHA and as a minimum, employees must be given a copy [Appendix D](https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134AppD) *Information for Employees Using Respirators When Not Required Under the Standard*. It contains information about the proper use and limitations of these types of respirators. If employees are given an N95 mask, this is a respirator and a formal respirator program is required to be implemented.
* Where an employee with a disability needs a related reasonable accommodation under the ADA (e.g., non-latex gloves, modified face masks for interpreters or others who communicate with an employee who uses lip reading, or gowns designed for individuals who use wheelchairs), or a religious accommodation under Title VII (such as modified equipment due to religious garb), the employer should discuss the request and provide the modification or an alternative if feasible and is not an undue hardship and the accommodation does not pose a direct threat to the employee or others.
* Try to 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.
* For employees that are not in the higher-risk populations and are reluctant to report to work, try and accommodate the request, but an employer can mandate attendance and take appropriate disciplinary action for workers for violating its attendance policy. Depending upon the employee, putting them on leave or using existing time-off policy, which typically requires approval to use vacation or PTO may be a better choice than termination.
	+ OSH Act - Employees can refuse to work if they reasonably believe they are in imminent danger, according to the Occupational Safety and Health (OSH) Act. They must have a reasonable belief that there is a threat of death or serious physical harm likely to occur immediately or within a short period for this protection to apply. An employee can refuse to come to work if:
		- The employee has a specific fear of infection that is based on fact—not just a generalized fear of contracting COVID-19 infection in the workplace.
		- The employer cannot address the employee's specific fear in a manner designed to ensure a safe working environment.
	+ The National Labor Relations Act (NLRA) grants employees at unionized and nonunionized employers the right to join together to engage in [protected concerted activity](https://www.shrm.org/resourcesandtools/legal-and-compliance/employment-law/pages/coronavirus-protected-concerted-activity-unions.aspx). Employees who assert such rights, including by joining together to refuse to work in unsafe conditions, are generally protected from discipline.
	+ The Americans With Disabilities Act (ADA) requires employers to reasonably accommodate employees who request altered worksite arrangements, remote work or time off from work due to underlying medical conditions that may put them at greater risk from COVID-19. The [EEOC's guidance on COVID-19 and the Americans with Disabilities Act](https://www.eeoc.gov/eeoc/newsroom/wysk/wysk_ada_rehabilitaion_act_coronavirus.cfm) (ADA) notes that accommodations may include changes to the work environment to reduce contact with others, such as using Plexiglas separators or other barriers between workstations.
	+ The Families First Coronavirus Response Act (FFCRA) allows an employee to self-quarantine if a health care provider advises an employee to do so because the employee is particularly vulnerable to COVID-19. The FFCRA applies to employers with fewer than 500 employees, and the quarantine must prevent the employee from working or teleworking. [FFCRA regulations](https://www.shrm.org/resourcesandtools/legal-and-compliance/employment-law/pages/dol-releases-ffcra-regulations-coronavirus.aspx) permit employers to require documentation for paid sick leave.
* Any employers taking temperatures, administering COVID-19 tests, or asking employees about symptoms should maintain all information collected as a confidential medical record in compliance with the Americans with Disabilities Act, the Health Insurance Portability and Accountability Act, and state and federal privacy laws.
* Establish a communication channels for employees to address concerns and address any health and safety concerns brought by employees promptly.
* Remind employees and management that discrimination and retaliation to concerns raised about safety or other matters is strictly prohibited.

As we continue to respond to this unprecedented pandemic, staying current on changes to orders, recommendations, and communication with employees is key to ensure everyone is safe and stays healthy. It will be critical to stay flexible during these time and take as many measures as possible to reassure your employees that all appropriate measures are being take to protect their legal rights and safety.

 If you have any questions or need additional information, please contact the SGIA Government Affairs Department at govtaffairs@sgia.org.