

# Returning To Work In The COVID-19 Environment | What It Means For Manufacturing Operations & Employees

May 6, 2020

As states begin to lift “shelter in place” orders or re-evaluate which industries are considered essential,” it is critical to have a plan in place to restart your manufacturing operations and bring facilities back online. USI has prepared the following guidelines for facilities that have been idled or operating at reduced capacity due to COVID-19.

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Category	Potential Requirements
<b>Worker Health and Wellness Precautions</b>	<p>At this moment, there is little formal guidance from the Centers for Disease Control and Prevention (<a href="#">CDC</a>), Occupational, Safety &amp; Health Administration (<a href="#">OSHA</a>), or other government agencies on reopening “non-essential” businesses and how to return workers back to work. OSHA’s guidance and recommendations for “essential” businesses, (i.e. health care and construction) is a good resource for developing your plan to restart an idled facility or operation. Businesses should begin by updating their infectious disease preparedness, response plan, and corresponding infection prevention measures to include identifying risk levels in workplace settings and determine any appropriate control measures to implement, such as social distancing, symptom checking, hygiene, decontamination procedures and training.</p> <p>» Please ensure you are keeping up to date with <a href="#">CDC recommendations</a>.</p>
<b>Reopening: Administration Guidelines</b>	<ol style="list-style-type: none"> <li>1. Identify Executive/Administrative Team to develop reopening plan.</li> <li>2. Continue to review guidance and recommendations from Federal, State, local, tribal, and/or territorial health agencies, and determine if those recommendations and guidance should or can be incorporated into workplace-specific plans.</li> </ol>

3. Complete Hazard Assessments to identify where and how workers can be exposed to COVID-19 and from what sources. Identify lower, medium, high and very high exposure risk jobs/tasks/processes.
4. Evaluate business processes/tasks and identify additional health controls to protect employees from COVID-19 while they perform their activities.
5. Review and update employment policies. Federal, State and Local Governments have implemented COVID-19 specific legislations, guidance and regulations regarding various employment laws and Human Resource policies that relate to employee leaves of absence, screening/tracking and privacy issues.
6. Prepare a document to communicate reopening procedures to all employees prior to the actual reopening date to explain possible screening, Personal Protective Equipment (PPE) requirements, social distancing/spacing, entry points, attendance and scheduling changes (mass mailing/emails/texts).
7. If the facility's workforce is unionized, develop a communication process with appropriate union representatives.
8. Develop a schedule to stagger start dates for returning employees, starting with critical employees first, then other positions returning the following days/weeks. Consider operating on multiple shifts if possible, or staggering start times.
9. Maintain an accurate tracking system of any overtime work being performed by any non-exempt (not salaried) employees. Regulations regarding overtime and minimum wage issues are established by the Fair Labor Standards Act (FLSA).
10. Production lines may need to be throttled down, redesigned or adjusted to allow for less employees on the line to maintain 6-foot social distancing.
11. Install controls (physical barriers, testing stations, etc.) and evaluate supplies such as thermometers, face covers, antibacterial wipes, soap and hand sanitizer.
12. Coordinate with vendors, contractors, and suppliers on delivery and service procedures.
13. Train critical employees and supervisors on company developed COVID-19 work procedures and practices prior to reopening the facility/plant to all workers.
14. Designate key shift supervisors and/or safety representatives to enforce COVID-19 protocols.
15. Conduct tests/drills with controls in place to identify any deficiencies before employees return.
16. Increase COVID-19 related communications throughout building/plants to include CDC posters, scrolling signs, messages on monitors in break rooms, pre-shift talks, etc.
17. Management should prepare for potential protests and complaints following the reopening.
18. Initiate training of employees of the new COVID-19 procedures immediately when the employees return to work.

## Recommended Measures for Reopening Facilities

Personnel who were initially involved in idling the facility should be available to assist with the reopening. If formal notice of building closure was provided to the police and fire department, notify them of your intention to reoccupy the premises. Now is a perfect time to update your organization's emergency contact information and ensure that local authorities have access to that information. Ensure the facility's rapid access system "Knox Box" is accessible and has up-to-date access tools and information.

**Inspect the building envelope.** This would include a visual inspection of perimeter walls, doors and windows to look for signs of forced entry or weather damage. Inspect for signs where animal and rodents may have entered the building. Review current integrated pest management strategies and implement or revise strategies as required. Inspect the roof for signs of damage, ponding water or leakage. Make sure roof drains are free from debris and flowing freely. Inspect the underside of the roof for any signs of leakage. Confirm that there are no combustible materials (idle pallets, lumber, trash, vegetation, etc.) being stored immediately adjacent to the exterior perimeter walls. Confirm that access-limiting property features such as walls, fencing, and gates are intact and secured.

**Inspect the building interior.** All lighting systems should be operational, including emergency lighting and exit signage. Make sure that required exits are operational and paths of egress remain clear.

**Perform an inspection of the fire sprinkler system.** It would be a good idea to arrange for a 2-inch drain and inspector's test to be performed to verify water supply integrity and alarm function. Drain tests should be performed annually while alarm tests should be conducted quarterly. The central station alarm monitoring firm should be notified prior to testing. Closely observe the sprinkler system water supply valves to confirm that they are in the fully open position. Ascertain that the valves are properly sealed and/or equipped with chains and locks. Inspect the fire department connections to confirm that the protective caps are securely in place.

If the sprinkler system is supplied by a fire pump, perform a churn test with no flow to verify operation. If the pump has not been flow-tested within the last 12-months, arrange for a full flow test.

**Mechanical Systems.** Perform an inspection of mechanical systems including idled HVAC systems, boilers, chillers, and compressors. If the boilers have not had a State-required jurisdictional inspection within the last 12-months, arrange an inspection with a licensed inspection authority. Perform a test of combustion safety controls for gas-fired heating or production equipment.

**Air filters.** Air filters should be changed on a frequent basis using appropriate PPE, including respirators and gloves. Systems should be off when changing filters. Adjust air handlers to bring in as much outside air as possible. Ventilation systems should be brought up to operating speed well before normal occupancy times, and for a period thereafter. Ventilation systems should not be completely shut off on weekends.

- [REHVA COVID-19 Guidance Document](#) – How to Operate and Use Building Services in Order to Prevent the Spread of the Coronavirus Disease (COVID-19) Virus (SARS-CoV-2) in Workplaces.

**Electrical.** If not performed within the last 5 years, perform a thermographic scan of critical electrical distribution systems to detect overheating due to loose connections or dirt accumulation.

**Critical Production Equipment.** Perform an inspection of critical production equipment and operating components including safety devices. Check equipment for lubrication and adjustment. Established lock out, tag out procedures should be followed.

**Raw Materials.** Conduct a raw materials inventory and check for shelf life. Verify that suppliers are still able to provide raw materials for production.

**Develop a comprehensive Water Management Program (WMP) for your water system and all devices that use water.**

1. [Water Management Program Toolkit](#)

This toolkit is designed to help people understand which buildings and devices need a *Legionella* water management program to reduce the risk of Legionnaires' disease, what makes a good program, and how to develop it.

2. [Preventing Legionnaires' Disease](#)

A Training on *Legionella* Water Management Programs (Prevent LD Training): take this training from CDC and its partners on creating a water management program to reduce the risk of Legionnaires' disease. Prevent LD Training aligns with industry standards on managing the risk of *Legionella* bacteria.

3. *Ensure your water heater is properly maintained and the temperature is correctly set.*

- a. Determine if your manufacturer recommends draining the water heater after a prolonged period of disuse. Ensure that all maintenance activities are carried out according to the manufacturer's instructions or by professionals.
- b. Make sure that your water heater is set to at least 120°F.
- c. Higher temperatures can further reduce the risk of *Legionella* growth, but ensure that you take measures to prevent scalding if your water heater is set to >130°F.

4. *Flush your water system.*

- a. Flush hot and cold water through all points of use (e.g., showers, sink faucets).
  - i. Flushing may need to occur in segments (e.g., floors or individual rooms) due to facility size and water pressure. The purpose of building flushing is to replace all water inside building piping with fresh water.
- b. Flush until the hot water reaches its maximum temperature.
- c. Flush drinking water sources as per the Environmental Protection Agency's (EPA's):
  - i. [Flushing Best-Practice Guidelines](#)
  - ii. Also see this resource, "Guidance for Building Water Systems," from the CDC: <https://www.cdc.gov/coronavirus/2019-ncov/php/building-water-system.html>.

5. *Clean all decorative water features such as fountains.*

- a. Be sure to follow any recommended manufacturer guidelines for cleaning.
- b. Ensure that decorative water features are free of visible slime or biofilm.
- c. After the water feature has been re-filled, measure disinfectant levels to ensure that the water is safe for use.

6. *Ensure cooling towers are clean and well-maintained.*

- a. Ensure that cooling towers are maintained (including start-up and shut-down procedures) per manufacturer's guidelines and industry best practices.
- b. Ensure that the tower and basin are free of visible slime or biofilm before use.

	<ul style="list-style-type: none"> <li>i. If the tower appears well-maintained, perform an online disinfection procedure. For more information, review the <a href="#">Guidance on disinfection procedures from the Cooling Technology Institute</a>.</li> </ul> <p>7. <i>Ensure safety equipment, including fire sprinkler systems, eye wash stations, and safety showers, are clean and well-maintained.</i></p> <ul style="list-style-type: none"> <li>a. Regularly flush, clean, and disinfect these systems according to manufacturers' specifications.</li> </ul> <p>8. <i>Maintain your water system.</i></p> <ul style="list-style-type: none"> <li>a. Consider contacting your local water utility to learn about any recent disruptions in the water supply. This could include working with the local water utility to ensure that standard checkpoints near the building or at the meter to the building have recently been checked or request that Disinfectant Residual entering the building meets expected standards.</li> <li>b. After your water system has returned to normal, ensure that the risk of <i>Legionella</i> growth is minimized by regularly checking water quality parameters such as temperature, pH, and disinfectant levels.</li> <li>c. Follow your water management program, document activities, and promptly intervene when problems arise.</li> </ul>
<p><b>Recommended Measures for Protecting Employees and Guests</b></p>	<ol style="list-style-type: none"> <li>1. Prepare screening procedures for employees, vendors, and guests entering the facility/plant. Determine responses to "Employee Refusals to be Tested."</li> <li>2. Require anyone who is sick or not feeling well to stay home, except to get medical care.</li> <li>3. Have employees inform their supervisors if they have a sick family member at home with symptoms of COVID-19 or if they or their family members have tested positive for COVID-19.</li> <li>4. Consider sharing known or suspected cases of COVID-19 with vendors and contractors and encourage them to do the same.</li> <li>5. Initiate a way to communicate with Human Resources anonymously so employees can voice concerns regarding work exposures and additional controls.</li> <li>6. Follow proper classification of workers' exposures to COVID-19 by providing PPE such as gloves, goggles, face shields and face masks, consistent with the activity being performed, and as required to meet the assigned risk exposure level recommended by OSHA guidance.</li> <li>7. Practice social distancing by maintaining a minimum 6-foot distance from others.</li> <li>8. Create a central entry point to the facility and maintain a daily attendance log of all workers and guests. Be sure to have a documented screening process in place. If you have a gathering of people at the central entryway, place markings on the floor at 6-feet apart to assure a safe distance and allow for proper screening.</li> <li>9. Stagger starting times to reduce density and ensure that a minimum 6-foot separation/social distancing is always adhered to.</li> <li>10. Hold daily pre-shift meetings and employee orientations at staggered schedules.</li> </ol>

11. Identify “choke points” and “high-risk areas” where workers are forced to stand together, such as hallways, time clock, elevators, break areas, locker rooms, shared lockers, and restrooms, and control them so social distancing is maintained.
12. Suggest telephonic or outdoor meetings when a group must convene.
13. Develop hygiene procedures for shared timeclock areas, locker rooms, shared lockers and restrooms.
14. Preclude gatherings of any size and ensure a minimum 6-foot separation any time two or more people must meet.
  - Monitor parking lots prior to employees starting a shift and during shift changes.
15. Minimize interactions when picking up or delivering equipment or materials; ensure minimum 6-foot separation.
16. Discourage workers from using/sharing work tools and equipment of others. Require that all general facilities, tools, and equipment are cleaned and disinfected before and after each shift.
  - Have specific guidelines for Powered Industrial Trucks (PITs), Zambonis, and related equipment to include Pre- and Post-shift disinfecting.
  - Have specific guidelines for work areas (desks, assembly lines, etc.) to include Pre- and Post-shift disinfecting.
17. Prevent employees from using “Non-Personal” tools and equipment (e.g. Push sticks, PPE normally stored at the propane tank filling station, bailer and/or shrink wrap machine).
18. Post, in areas visible to all workers, required hygienic practices including: not touching their faces with unwashed hands or with gloves; washing hands often with soap and water for at least 20 seconds; using hand sanitizer with at least 60% alcohol, cleaning AND disinfecting frequently-touched objects and surfaces such as workstations, keyboards, telephones, handrails, machines, shared tools, elevator control buttons, doorknobs and portable commodes; covering the mouth and nose when coughing or sneezing; and other hygienic recommendations by the CDC.
19. Place wash stations or hand sanitizers in multiple locations to encourage hand hygiene.
20. Avoid shaking hands or making other unnecessary direct contact with staff.
21. Avoid carpooling unless employees are family members living within the same household. If the case arises that others are transported in a personal or company vehicle, the company or employee should follow the [CDC guidelines on cleaning and disinfection](#).
22. Deposit disposable paper towels and similar waste in non-touch waste bins.
23. Instruct employees not to cough or sneeze into their hand; rather, they should direct coughs and sneezes into a cloth or tissue or, if not available, the crook of their arm at their elbow; follow established CDC guidelines.
24. Re-train employees on emergency evacuation procedures since some workstations and plant layouts may have changed. Also, think about assembly areas, both internally and externally for emergency situations related to fires, explosions, tornados, etc.
25. Suggest that in some instances, employees should consider changing work clothes and shoes prior to leaving the workplace or arriving at home. Instruct them not to shake out clothing and not launder their work clothes with other laundry.

<p><b>For Guests Specifically</b></p>	<ol style="list-style-type: none"> <li>26. Create a policy for limiting the types of guests permitted onsite to essential vendors and contractors. Eliminate all nonessential guest visits, if possible.</li> <li>27. All guests onsite should be escorted onto the premises and limited to workplace areas where work is being performed.</li> <li>28. Restrict access to the premises by the general public.</li> <li>29. Strictly monitor all entrances and exits limiting access points and direct all guests to a central point of entry.</li> <li>30. Train reception personnel on safe practices in dealing with guests.</li> <li>31. Glass screens should be placed between reception personnel and guests.</li> <li>32. Utilize touchless registration or a smartphone app to be notified of guest arrivals and to check-in guests at the front desk.</li> <li>33. Supply all guests with proper PPE while onsite.</li> </ol>
<p><b>Office Work Conditions</b></p>	<ol style="list-style-type: none"> <li>1. Direct your employees to only use the equipment at their desks. Employees should refrain from using anyone else’s phone, desk or computer equipment.</li> <li>2. Eliminate or minimize the use of conference rooms. If a conference room is needed, minimize the number of employees in a room to allow for 6-foot distancing between seated areas.</li> <li>3. Minimize workspace crowding and allow for proper distancing between cubicles. Whenever possible, use higher cubicle wall heights.</li> <li>4. Prohibit guest visits and conduct client meetings by teleconference if possible. If guest visits are necessary, strictly monitor entrances and exits and limit the areas a guest can access.</li> <li>5. Eliminate the use of personal office/cubicle fans to reduce the potential virus distribution throughout the office.</li> <li>6. Eliminate temporarily the use of kitchen refrigerators.</li> <li>7. Place tapelines on floors behind cubicles to create 6-foot distancing.</li> <li>8. Close any company gyms and other nonessential amenities that may result in overcrowding.</li> <li>9. Ask employees to avoid taking the elevator or limit occupancy to 50% of maximum capacity.</li> <li>10. Strengthen logistics management, including food delivery and express deliveries.</li> </ol>
<p><b>Recommended Measures for Cleaning, Disinfecting and Supplies</b></p>	<ol style="list-style-type: none"> <li>1. Follow <a href="#">CDC guidelines</a> for Cleaning and Disinfection.</li> <li>2. Review site inventory of cleaning chemicals, materials, and consumables to ensure proper inventory levels.</li> <li>3. Ensure Safety Data Sheets (SDS) are available for all chemicals and requirements for safe use are followed.</li> <li>4. Ensure cleaning equipment and tools are in working condition.</li> <li>5. Have cleaning staff review and complete refresher training on general cleaning and site-specific protocols. Discuss with cleaning vendors/contractors if needed.</li> </ol>

	<ol style="list-style-type: none"> <li>6. Train employees on proper disinfecting guidelines.</li> <li>7. Determine areas that require thorough cleaning due to heavy usage.</li> <li>8. Take precautions when using cleaning chemicals. Do NOT mix cleaning products that contain bleach and ammonia. Dangerous gases can be released and can cause severe lung damage. Provide sufficient ventilation (airflow); require protective clothing, gloves and safety goggles, when needed; properly label containers of cleaning chemicals; train on the hazards of the cleaning chemicals you are using; and always follow safe work practices.</li> <li>9. Develop procedures for collecting uniforms, aprons, rubber boots, etc. to be laundered and disinfected. Follow OSHA and CDC guidelines.</li> </ol>
<p><b>Recommended Measures for Frequently Touched Areas</b></p>	<p>Provide disinfectant sprays or wipes adjacent to each touchpoint, consider the following specific precautions:</p> <ul style="list-style-type: none"> <li>▪ <b>Light/Power Switches</b> <ul style="list-style-type: none"> <li>– Affix signage to remind occupants to keep switches “on” all day.</li> <li>– Install movement detectors to activate light switches.</li> <li>– Train employees to conduct pre- and post-shift and/or job rotation cleaning/disinfecting of machine switches, e-stops, shared tools, etc.</li> </ul> </li> <li>▪ <b>Doors and Drawers</b> <ul style="list-style-type: none"> <li>– Remove non-essential doors.</li> <li>– Remove door handles if viable.</li> <li>– Affix doors to open position.</li> </ul> </li> <li>▪ <b>Collaboration Tools</b> <ul style="list-style-type: none"> <li>– Train employees on shared tools, equipment, etc. to practice pre- and post-shift cleaning/disinfecting.</li> </ul> </li> </ul>
<p><b>Recommended Measures for Shipping and Receiving Areas</b></p>	<ol style="list-style-type: none"> <li>1. Require employees handling deliveries to wear appropriate PPE to receive raw goods, parcels, etc.</li> <li>2. Develop a plan to sanitize received materials.</li> <li>3. Work with suppliers and vendors to ensure best practices to reduce or eliminate contaminated materials.</li> </ol>
<p><b>Employee Training</b></p>	<p>Train all workers who have reasonably anticipated occupational exposure to COVID-19 about the sources of exposure, the hazards associated with exposure, and appropriate workplace protocols in place to prevent or reduce the likelihood of exposure to the virus. Training should include information about how to isolate individuals with suspected or confirmed COVID-19 or other infectious diseases, and how to report possible cases. Training must be offered during scheduled work times and at no cost to the employee. Consider using computer-based remote learning management systems to eliminate face-to-face gatherings.</p> <p>Workers required to use PPE must be trained. This training should include when to use PPE; what PPE is necessary; how to properly put on, use, and take off PPE; how to properly dispose of, disinfect, inspect for damage, and maintain PPE; and the limitations of PPE. Applicable standards include the PPE (<a href="#">29 CFR</a></p>



[1910.132](#)), Eye and Face Protection ([29 CFR 1910.133](#)), Hand Protection ([29 CFR 1910.138](#)), Respiratory Protection ([29 CFR 1910.134](#)) standards, and [temporary guidance during this pandemic](#).

» On April 8, 2020, OSHA released their “Expanded Temporary Enforcement Guidance of Respiratory Protection Fit-Testing for N95 Filtering Facepieces in All Industries During the Coronavirus Disease 2019 (COVID 19) Pandemic,” and it can be found [here](#).

» In New York State, Executive Order 202.16 on “Face Coverings” went into effect on April 15, 2020, at 8 p.m. Information on the executive order can be found [here](#). Additionally, the CDC posted information on how to use, wear, and make Face Coverings can be found [here](#).

In addition, OSHA offers a variety of [training videos](#) on respiratory protection.

When the potential exists for exposure to [human blood, certain body fluids, or other potentially infectious materials](#), workers must receive training required by the Bloodborne Pathogens (BBP) standard ([29 CFR 1910.1030](#)), including information about how to recognize tasks that may involve exposure and the methods, such as engineering controls, work practices, and PPE, to reduce exposure. Further information on OSHA’s BBP training regulations and policies is available for employers and workers on the OSHA [Bloodborne Pathogens and Needlestick Prevention Safety and Health Topics](#) page.

OSHA’s [Training and Reference Materials Library](#) contains training and reference materials developed by the OSHA Directorate of Training and Education, as well as links to other related sites. The materials listed for Bloodborne Pathogens, PPE, Respiratory Protection, and SARS may provide additional material for employers to use in preparing training for their workers.

As a practical matter, employee morale may be affected by whether they understand that you, as the employer, have taken all necessary measures to keep employees safe on the job. The CDC notes that employers should anticipate fear, anxiety, rumors, and misinformation, and should tailor their communications with those possible reactions in mind.

Employers should over-communicate with employees to reiterate existing workplace rules, and outline any temporary rules, related to ensuring workplace health and safety. Employers should strongly consider preparing a written communication to employees that outline these policies and expectations to keep employees healthy and safe in connection with the COVID-19 outbreak.

As previously stated, employers are encouraged to review CDC and OSHA strategies for minimizing the potential risk of exposure to all employees. This information is updated regularly and changes frequently.

**Workers’ Compensation and OSHA Reporting Guidelines**

With no vaccine for this easily transmitted virus and businesses beginning to re-open and/or increase production up to “normal” levels in accordance with easing restrictions, businesses could see an increase in workers’ compensation claims related to COVID-19. In the event an employee notifies you that they have contracted or have been exposed to the virus, and they believe it to be work-related, the employer should immediately complete a thorough investigation, documenting the facts and circumstances of the employee’s claim and report the claim to your workers’ compensation carrier for a compensability review and decision.

Every state/jurisdiction has its own workers’ compensation laws and criteria for defining compensability, with each state defining and addressing occupational disease and illness differently.

Employees typically have the burden of proving that their injury or illness is work-related - that it arose out of (what the employee was doing at the time of the injury/illness) and in the course of employment (when the injury/illness happened). The burden of proving that the Coronavirus was contracted at work, versus a public venue or activity, will be difficult to overcome. However, over the past few weeks

we have seen many states introduce and/or institute new legislation related to workers' compensation, in order to cover COVID-19 losses for essential employees. How this new legislation and any future legislation will respond to employees as they re-enter the workplace, will remain to be seen. Every claim is unique and will be evaluated on its own set of facts, as well as on the state's workers' compensation laws to determine compensability.

### **OSHA**

OSHA also recently issued interim guidance regarding Coronavirus recordkeeping requirements and while there has been some loosening of regulations, employers must still provide a safe work environment for their employees. Pursuant to the OSHA recordkeeping requirements and as codified at 29 CFR Part 1904, employers with 10 or more employees must record certain work-related injuries and illnesses on their OSHA 300 Log. Any work-related exposure resulting in a COVID-19 diagnosis is required to be recorded on your OSHA 300 Log and your local Health Department should be notified. The OSHA 300 Log COVID-19 recording requirement is only triggered if the following conditions are present:

1. The situation involves a confirmed case of COVID-19;
2. There is objective evidence that the case is work-related, as defined by 29 CFR 1904.5; and
3. The case involves one or more of the general recording criteria laid out in 29 CFR 1904.7 (e.g., days away from work or medical treatment beyond first aid).

An employee who reports symptoms common with the COVID-19 virus is not enough to warrant logging a case into your OSHA Log recording. The requirement also is not necessarily prompted when an employee exhibits symptom(s) consistent with COVID-19 at work but has not actually tested positive for the virus.

When an employee has tested positive for COVID-19, the employer must evaluate whether the illness is "work-related" per any of the three OSHA 300 Log recording conditions. If available information is insufficient to determine the proximate cause of the employee COVID-19 infection, OSHA recommends that the case be recorded on the OSHA 300 Log and later removed if it does not meet the recording conditions. Cases such as these may require Legal Counsel review.

A key best practice, OSHA suggests, is training employees about their right to report issues to OSHA without fear of retaliation. OSHA is required to investigate all complaints, no matter who submits them or what their underlying motive may be. Employers should create an open communication with employees to voice their safety concerns, to allow for corrective action to be implemented, and to keep accurate records of employee training/programs.

OSHA also suggests an anti-retaliation program that includes these five elements:

1. Committed managers who lead by example, encourage employees to report concerns and respect confidentiality.
2. A clearly communicated system for resolving employees' reported concerns.
3. A system for receiving and responding to reports of retaliation.
4. Promotion of anti-retaliation against employees and managers.
5. Program oversight, which may include regular monitoring or audits that identify the program's strengths and weaknesses.

The following resources provide additional information on OSHA reporting requirements, workers' compensation claims, and OSHA best practices for preparing workplaces for COVID-19:

- [Coronavirus \(COVID-19\) Workers' Compensation and OSHA Advisory](#)
- [OSHA Coronavirus Compliance Bulletin](#)
- [OSHA Best Practices](#)
- [OSHA's COVID-19 Website](#)

We anticipate Federal and state authorities to provide additional guidance and considerations regarding the resumption of operations. USI risk control consultants can assist businesses in evaluating and implementing the above noted guidelines, to ensure a safe and seamless reopening. Businesses leaders should reach out to their USI representative or visit [www.USI.com](http://www.USI.com) for more information.

## Helpful Resources

To help clients navigate these challenging times USI has implemented a **STEER (Steer Through Epidemic & Economic Recovery) Task Force**. This cross-functional team is working to provide timely COVID-19 information, understand cross-industry and geography impact and evolving responses, and to develop and deliver tailored solutions to help clients **steer** through this epidemic challenge and economic recovery.

For additional resources, tools, information, and links, please visit our COVID-19 resource page:

[www.usi.com/public-health-emergencies](http://www.usi.com/public-health-emergencies)

