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Risk Consulting Alert

Tips for Restoring Business Property Operations

As the COVID-19 pandemic recedes and states start to open up, your business may begin to resume operations. This alert provides tips for safely reopening your property. Reopening a business is similar to an initial startup. Have a plan based on clear and precise roles and responsibilities for each department. Each associate will have their role to play in ensuring a quick return to normal activities.

This alert contains tips for re-opening your business property. You are responsible to ensure that all areas of the property are maintained in compliance with all applicable laws, codes and regulations.

This alert is not a comprehensive guide and must be carefully reviewed and considered based upon company and brand standards; local, state and federal health authorities; the specific nature of your property; and a thorough examination, review and assessment of exposures, hazards, and controls. Consult with legal counsel, marketing and public relations teams when developing any form of internal and external policy document and communications with employees, visitors, the media and the public.

COVID-19 Training Programs

Consider developing a COVID-19 specific training program for employees. Consider guidelines from the CDC via the following link – https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html. Consider training content to include, but not be limited to, the following:

- COVID-19 Basics: signs, symptoms, what to do if employee exhibits any symptoms

- Handwashing protocols including hands on demonstration

- Location of: soap and water hand washing sinks, hand sanitizers, disinfecting supplies and personal protective equipment (PPE)

- Breaks available to wash hands

- When and how to wear masks & other PPE

- Avoid touching face

- Social distancing measures in place among visitors and employees at property

- Personal protective equipment – what is available and how to wear, remove, dispose

- Report safety and health concerns

- Include Whistleblower protection language in all training documents

Re-opening Orientation

Hold an initial meeting with the General Manager and department heads to set parameters for initial assignments and priorities for supervisors and managers involved in the reopening. This will include scheduling the specific cleaning activities required and verification that all managers, supervisors and employees understand their responsibilities and safety roles.

Hold additional meetings with department heads and all department supervisors / managers to review the re-opening required tasks and COVID-19 safety protocols. Provide guidance on retraining of key tasks with specific hazards such as lockout-tag out, safe lifting practices or other critical safety trainings by supervision with re-hired staff

Establish & Communicate Physical Distancing Protocols

Consult with legal counsel, marketing and public relations teams to develop and include a policy and protocol regarding physical distancing measure taken with employees and visitors that may include, but may not be limited to, the following examples:

Queuing: Any area where visitors or employees may queue should be clearly marked for appropriate physical distancing. This includes lines for building entrances, elevator lobbies, and transportation.

Cafeterias and Break Rooms: Capacity should be reduced to allow for a minimum of six feet between each employee. Other protocol may including: Replacing benches with individual chairs. Clearly marking with tape where seating is allowed. Only allowing one person in the break room at one time. Instructing employees on cleaning refrigerators and coffee machines between uses. Suspend all self-serve buffet-style food service and replace with alternative service methods.

Meeting Spaces: Allow for physical distancing between visitors in all meetings and events based on CDC, state and local health authority recommendations.

Office and Production Areas: Use physical distancing protocols in the office areas, conference rooms, training rooms, shared office spaces, warehouses, storage areas and manufacturing areas and other high-density areas in order to ensure appropriate distancing between employees.

Establish & Communicate Enhanced Surface Cleaning & Disinfecting Protocols

Any contract or agreement with a third-party cleaning vendor must be carefully reviewed and subject to established and sound contractor management and risk transfer policies and protocols. Work with your cleaning vendors in the selection of products and tools that are specific to your industry and needs of your property.

1. Use cleaning and disinfecting products that are identified on EPA List N, the list of disinfectants registered with the Environmental Protection Agency (EPA) against SARS-CoV-2 (colloquially, COVID-19). Review the list via the following link: https://www.epa.gov/pesticide-registration/list-n-disinfectants-use-against-sars-cov-2

2. Prior to purchase and implementation, obtain and review Safety Data Sheets for each product being considered to ensure that any product hazards are identified and acceptable and that products are compatible with your property's surfaces, fixtures, fabrics, etc.

3. Determine the need for specific tools and secondary containers for proper use of the product to ensure that sprays and other methods of application are performed correctly, safely and per the manufacturer's recommendations.

4. Consider alternative product application equipment such as pressurized spray containers and electrostatic sprayers, and ensure that whatever application equipment is used does not compromise the effectiveness of the sanitizer or disinfectant on the surfaces applied.

5. Test samples of surfaces and fabrics throughout the property to ensure that products do not damage or stain surfaces and fabrics.

6. Determine cleaning product vendor's ability to assist in training employees in the correct mixture/dilution (if necessary); use of appropriate secondary containers and labeling; and use of cleaning product(s).

Ensure that the selection and use of any personal protective equipment (PPE) is based on a hazard assessment following the hierarchy of controls, with the understanding that PPE is the final method of protection to be considered and implemented when all other methods are insufficient at reducing the hazards. PPE should be provided by the employer at no expense to the employees; and it should be provided in a variety of sizes for the employees who will be required to use it (OSHA 29 CFR § 1910.132(h)(1)).

When evaluating and considering tasks that involve chemical, dust, particulate and vapor exposures, be certain that you are basing your evaluations, assessments, determination, and selection of PPE on product information and PPE recommendations in the products' Safety Data Sheet (SDS). This may include, but may not be limited to, consideration of eye and face protection; hand protection; and respiratory protection.

When evaluating and considering tasks that involve exposure to bio-hazards, be certain that you are basing your evaluations, assessments and determination and selection of PPE if your property has a specific Blood borne Pathogen Exposure Control Plan and Infection Control Plan. This may also include, but may not be limited to, consideration of eye and face protection; hand protection; and respiratory protection.

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- Examples of PPE: nitrile gloves, gown/apron such as disposable Tyvek-style coveralls, mask or respirator and goggles or face shield

For any PPE used, ensure that employees are trained in, and adhere to, the CDC guidelines for donning and removing PPE https://www.cdc.gov/hai/pdfs/ppe/ppeposter148.pdf

Consider the following guidelines for 'high-touch' areas

Public Spaces and Communal Areas: Increase the frequency of cleaning and sanitizing in all public spaces with an emphasis on frequent contact surfaces including, but not limited to, entrance doors, counters, security desks, elevators and elevator buttons, escalator and stair handrails, door handles, public restrooms, break rooms, fitness center equipment, dining surfaces and seating areas.

Office Areas: Update cleaning and sanitizing protocols used to clean offices, cubicles, shared copy/printer rooms, with particular attention paid to high-touch items including desk tops, chairs, door and furniture handles, water faucet handles, telephones, in-room control panels, light switches, temperature control panels, and flooring.

Warehouse/Manufacturing: Increase the frequency of cleaning and sanitizing highly trafficked back-of-house areas with an emphasis on the employee entrances, work stations, uniform control rooms, employee restrooms, loading docks, offices, and kitchens.

Shared Equipment: Ensure that shared tools and equipment are sanitized before, during and after each shift or anytime the equipment is transferred to a new employee. This includes phones, radios, computers and other communication devices, production equipment, industrial equipment, engineering tools, safety buttons, cleaning equipment, and all other direct contact items used throughout the property.

Consider developing and issuing a statement regarding employee & visitor health

The health and safety of our employees and visitors is our number one priority.

Employee & Visitor Health Concerns: Communicate that employees have been given clear instructions to report all presumed cases of COVID-19 on property to the appropriate health authorities and are ready to provide support to our visitors. Employees are instructed to stay home if they do not feel well and are instructed to contact a manager if they notice a coworker or visitor with a cough, shortness of breath, or other known symptoms of COVID-19. Employees and visitors who are exhibiting any of the symptoms of COVID-19 while at the property are instructed to immediately notify their manager (employees) or management (visitors).

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Physical Distancing: Provide a method of communication to advise visitors of physical requirements while standing in lines, using elevators, or moving around the property. All physical layouts can be arranged to ensure appropriate distancing. Remind employees not to touch their faces and to practice physical distancing by standing at least six feet away from visitors and other employees whenever possible. At a minimum, all food service areas will comply with, or exceed, local or state mandated occupancy limits.

Signage: Ensure placement of health and hygiene reminders throughout the property including the proper way to wear, handle and dispose of masks.

Production and Office Areas: Ensure placement of signage throughout reminding employees of the proper way to wear, handle and dispose masks, use gloves (in positions deemed appropriate by medical experts), wash hands, sneeze and to avoid touching their faces.

Hand Sanitizer: Consider provide hand sanitizer dispensers, touchless whenever possible, at key visitor and employee entrances and contact areas such as driveways, reception areas, lobbies entrances, meeting spaces, elevator landings, and exercise areas.

Case Notification: Communicate existence of a policy regarding the notification of a presumptive or confirmed case of COVID-19 at the property, and that management will work with the local health authority to follow the appropriate recommended actions. Consult with your local and county health departments to determine appropriate actions if a visitor or worker presents symptoms of COVID-19 disease.

Consider developing and issuing a company and property policy regarding employee's responsibilities

Employees are essential in establishing and maintaining an effective sanitation and health program.

COVID-19 Training: Communicate that all employees will receive training on COVID-19 safety and sanitation protocols with more comprehensive training for teams with frequent visitor contact including Housekeeping, Food & Beverage, Public Area Department and Hotel Operations.

Hand Washing: Communicate that good hygiene and frequent handwashing with soap is vital to help combat the spread of the virus. All employees must be instructed to wash their hands, or use sanitizer when a sink is not available, every 60 minutes (for 20 seconds) and after any of the following activities: using the restroom, sneezing, touching the face, blowing the nose, cleaning, sweeping, mopping, smoking, eating, drinking, going on break and before or after starting a shift.

Personal Protective Equipment (PPE): Communicate that appropriate quantities and sizes of PPE will be made available and worn by all employees based on their role and responsibilities and in adherence to state or local regulations and guidelines. Employees must be trained on proper use and disposal of all PPE according to CDC guidelines. Every employee entering the property should be provided a mask and required to wear that mask while on property. Gloves can also be provided to employees whose responsibilities require them as determined by medical experts. Employee roles including housekeeping and public area attendants and security officers in direct contact with visitors may warrant gloves as PPE.

Daily Pre-Shift Meetings & Timekeeping Conduct: employee pre-shift meetings in areas that allow for appropriate physical distancing between employees. Modify larger departments and stagger employee arrival times to minimize traffic volume in production and office corridors and service elevators. Make hand sanitizer available at each timeclock location and require employees to sanitize their hands after clocking in. Management and leadership teams can ensure constant communication and proper PPE and sanitation procedures are followed and updated per the latest guidance from credible authorities including CDC, local health authorities, etc.

Property Assessments: Conduct daily walk-throughs of the entire building and property to ensure that the facility is being operated efficiently and that critical systems are maintained and remain in proper working condition.

Employee Training Programs

This is an opportunity to review your current safety and health program elements and policies, including new employee and ongoing training. It is also a good opportunity to develop an infection control policy that is aligned with the exposures and controls for your property. Take time now to review your entire new hire orientation content and format and ensure that your employee safety training has allocated reasonable, proportionate, and appropriate resources, including time, to exposure-specific elements in your properties.

Topics may include, but are not limited to OSHA's standards on Emergency Action Plans, Blood borne Pathogen Exposure Control Program, Hazard Communication, PPE, Eye & Face protection, Respiratory Protection, Sanitation, Specification for Accident Prevention Signs and Tags and Control of Hazardous Energy (Lockout Tagout).

Because there aren't specific OSHA standards for every exposure, be certain that your training method, content, and communication contemplates and includes essential elements of OSHA's general duty clause, including how the employer is able to demonstrate the following:

(1) Reasonable efforts to keep the workplace free of a hazard to which employees are exposed;

(2) That (and how) the hazard was recognized;

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(3) The hazard was causing or was likely to cause death or serious physical harm; and,

(4) A feasible and useful method to correct the hazard.

Training content may provide instruction and explanation regarding how hazards are identified and assessed, and how the hierarchy of controls were utilized and implemented in the workplace.

Sources:

CDC https://www.cdc.gov/coronavirus/2019-ncov/

OSHA https://www.osha.gov/SLTC/covid-19/controlprevention.html

To Learn More:

Contact Everest's Risk Consulting Department at (800) 269-6660 or losscontrol@everestre.com for additional information.

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