COVID-19

Return to Workplace Guide

Building Confidence. Together.

MAY 2020
These are unprecedented times — our communities, families, employees and organizations as a whole have all been impacted by the COVID-19 pandemic. The decision and process for returning to the workplace can be complex and encompasses a variety of key aspects — starting with a safe, clean and secure workplace.

Fostering the wellbeing of employees and an organization can mean many things — it goes beyond the physical health of your people, and the bricks and mortar of the buildings in which your teams work. It includes the way people connect, the stress and worries they may face personally and professionally, the work products they create, teams they lead and the culture that drives it all.

The connection between organizational wellbeing and risk management has never been more apparent or more important.

The opening of previously closed facilities and office buildings following the pandemic requires careful planning and consideration. As local, state and federal authorities evaluate and begin to loosen shelter-in-place orders and other restrictions, your risk management, human resources and operations teams should work together to develop an action plan that addresses potential challenges to protect your people, property and organization.

This guide is designed to be an initial approach in helping you develop an action plan guiding those decisions. It will also help you understand how Gallagher can help provide the services and resources you and your organization need during the pandemic recovery process.

5-Step Process to Returning to the Workplace

1. **ELIGIBILITY TO REOPEN**

2. **EMPLOYEES: Implementation Policies and Procedures by Role and Function**

3. **FACILITIES AND EQUIPMENT: Sanitization, Life Safety, Building System and Social Distancing**

4. **OPERATIONS SUPPLY CHAIN AND THIRD PARTY**

5. **CUSTOMERS, CLIENTS AND PUBLIC**
5-STEP PROCESS TO RETURNING TO THE WORKPLACE

**STEP 1**
**ELIGIBILITY TO REOPEN**
- Gallagher Forecast: Real-time COVID-19 geographic case monitoring and tracking
- Federal/local government
- Case data
- Gallagher Peak Infection Analysis

**STEP 2**
**EMPLOYEES: Implementation Policies and Procedures by Role and Function**
- Infection prevention measures
- Social distancing and hygiene
- Personal protective equipment
- Proactive claims management
- Employee assistance programs
- Compensation and benefits modifications
- HR policy considerations

**STEP 3**
**FACILITIES AND EQUIPMENT: Sanitization, Life Safety, Building System and Social Distancing**
- Cleaning and decontamination
- Industrial hygiene and engineering
- Protection and response

**STEP 4**
**OPERATIONS SUPPLY CHAIN AND THIRD PARTY**
- Product, services and partners
- Distribution/transportation/deliveries
- Business continuity planning

**STEP 5**
**CUSTOMERS, CLIENTS AND PUBLIC**
- Contact points
- Communications consulting
- Waivers and notices
- Claims reporting support
Gallagher has gathered a library of questions for employers to consider when determining a return to workplace plan.

Your Workplace

- What federal, state, or local guidelines and regulations apply to our organization and people as we contemplate returning to the workplace?
- Are we prepared and able to comply with all federal, state, and local return to workplace guidelines?
- Have we developed a site-level weekly work schedule that will allow us to meet our clients’ needs while also ensuring our employees’ safety and our compliance with relevant guidelines and regulations?
- Do we have a risk management process in place to cover worker re-entry and to account for new risks?
- Have we defined customer and visitor contact protocols by site?
- Have we identified which employees are most critical to return to a physical site and which employees can continue to work remotely?
- How are we treating remote work moving forward?
  - Staggering weeks in office and at home among team members, or part-time remote work on alternate weekdays.
  - Responding to employee requests to continue to work from home, including long-term arrangements.
  - Updating technology to support virtual workers.
  - Considering the long-term cost savings or impact of offering permanent remote work.
- Assuming more employees will be working remotely, how will we manage and deliver the same opportunities and benefits to our remote workers, as compared to those working onsite?
- For employees returning to a physical site, will we need to provide them with safe alternatives to local public transportation options?
- Can we develop and maintain return to workplace schedules at the employee level by site?
- How do we account for any childcare issues that our employees may have, especially given that almost all school districts remain closed?
- Have we established an incident management team, tools, and processes to ensure that we are ready to begin operations?
- Have we considered how new processes and risk controls will be monitored for operating effectiveness?
- Have we considered what steps we should take to implement temperature checks?
- Can we use contact tracing for employees and visitors to help reduce the risk of spreading COVID-19?
- Should we introduce sanitation protocols and more frequent and stringent cleaning protocols at each of our sites?
- Do we need to change our policies to encourage employees to clean their work spaces, take time to clean their hands, and promote our new safety protocols?
- Will we require our employees and visitors to wear personal protective equipment (PPE), such as masks when they are onsite? If yes, can we acquire enough PPE?
- Do we have guidelines for physical distancing for our employees while they are at work?
- Do we need to retain healthcare professionals or third-party vendors to implement our mitigation strategy, such as, screening and/or temperature taking?
- Do we have a targeted notification plan for notifying individuals at risk of exposure?
- Do we have a policy on immunity or disease testing?
- Have we developed a policy around business and personal travel for our employees?
- Do we have a policy on whether we will allow visitors onto our sites?
- Do we have a contingency plan in place if there is a significant spike in COVID-19 cases during the return transition period?
- How will we manage risk, including food safety, associated with all on site cafeterias?

Your People

- Is our leadership prepared and trained to lead a people-first way of working through this transition?
- Can our crisis management team transition to become our return to workplace team?
- What cultural strengths should we leverage as a focus point?
- Do we need to institute policies and programs to protect employees that have an underlying condition and are returning to a physical site?
- How do we help employees feel safe and comfortable as they return to their workplaces?
- How will we respond if an employee does not feel safe coming back to a physical work site, even though that employee cannot work remotely?
- How do reductions in hours of service, furloughs, or layoffs impact employee status for purposes of the ACA?
- Do we have a plan to address the mental and emotional health of our employees?
- What policies or programs can we introduce to help our employees manage their stress levels as they begin to come back to the workplace?
- What new benefits should we offer to promote the health and wellbeing of our employees?
No matter where your organization stands in the COVID-19 pandemic, Gallagher has the insurance, risk management and consulting resources to help protect your people, your property and your profits. Call your Gallagher consultant today to get the conversation started.

Your Communications

• What inventory of training on new workplace safety and disinfection protocols have been implemented?
• Do we have exposure-response communications ready to go to any affected employees and customers?
• Have we considered what policy updates should be circulated to employees?
• What employee benefits changes do we need to communicate to employees?
• Do we have media communications ready to release on topics such as return to workplace timetables, safety protections in place, and how our organization is supporting workers and customers? Are we prepared to respond to the media for workplace exposures?

Your Processes

• Have we coordinated an efficient business continuity plan that includes infectious disease control?
• Do we have the information necessary to facilitate efficient, data-driven decisions?
• Have we updated plan resources and contact information to ensure accuracy?
• What employee benefits deadlines have been impacted by disaster relief?
• Do we have a robust change management approach that can drive awareness during these difficult times and that can support our culture and organizational objectives?
• What is our plan for training on new processes, policies, and operational procedures during the transition back to workplace and afterwards?
• How will we define and measure a successful transition?
• What health verification solutions are best to ensure the privacy of our employees and the organization’s policies?
• How will we continue to meet our financial and corporate responsibility reporting, as well as all related disclosure requirements?
DETERMINING ELIGIBILITY TO REOPEN

Determining when to reopen your business or modify your current operations is an important decision. Understanding your eligibility to reopen is a critical first step that should be informed by credible resources from the White House, Centers for Disease Control and Prevention (CDC), Occupational Health and Safety Administration (OSHA) and directives by federal, state and local entities.

Eligibility to Reopen

☐ Review Current Government Guidance and Statistical Data
  ☐ White House “Guidelines for Opening Up America”
  ☐ State Health Department and Governor’s executive orders along with county and city ordinances
  ☐ Johns Hopkins Coronavirus Resource Center
  ☐ Centers for Disease Control Reopening Guidance

Additional Considerations

• Are there other data elements that can be used to estimate a date for safe reopening?

In addition to the regulatory directives that need to be followed to reopen your workplace, other data elements may be helpful:

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<thead>
<tr>
<th>Tool</th>
<th>How can it help?</th>
<th>How can we get started?</th>
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<tbody>
<tr>
<td>Gallagher Peak Infection Analysis</td>
<td>Illustrates a reasonable target date range for returning to the workplace by taking into account an organization’s location, the elapsed time since peak infection rates at those locations, and the prevailing shelter-in-place and stay-at-home orders in each state. Especially impactful for organizations with geographically dispersed populations.</td>
<td>Contact your Gallagher representative for more information.</td>
</tr>
<tr>
<td>Gallagher Forecast</td>
<td>A real-time analytics platform that can help select clients monitor confirmed cases of COVID-19 near critical locations and track growth rates of new cases globally to see where the curve is steepening or flattening.</td>
<td>Contact your Gallagher representative for more information.</td>
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</table>
IMPLEMENTATION OF EMPLOYEE POLICIES AND PROCEDURES BY ROLE AND FUNCTION

Employees are a critical part of your organization’s success. Keeping them safe and ensuring their wellbeing is key throughout any transition back into the workplace. Once you have established a timeframe for re-occupying your facility (or facilities), employee-specific policies, procedures and controls need to be implemented to ensure the safety of your people.

Consider the following items when developing potential workplace policies:

- Proper implementation of social distancing in the workplace (What is Social Distancing?)
- Local, state and federal guidelines (CDC, OSHA) and how they apply to your operation
- How to monitor and assess potential for employee exposure
- Selection and distribution of compliant protective measures and proper types of personal protective equipment (PPE)
- Proper employee health screening procedures and isolation of employees who may be infected (OSHA, 2020)
- Additional compliance considerations related to human resources policies and benefit programs

### PREPARE TO IMPLEMENT BASIC INFECTION PREVENTION MEASURES (OSHA, 2020)

<table>
<thead>
<tr>
<th>Measure</th>
<th>Description</th>
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<tbody>
<tr>
<td>Promote frequent and thorough hand washing.</td>
<td>Encourage sick employees to stay home.</td>
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<tr>
<td>Provide adequate or increased availability of sanitation stations in high traffic areas.</td>
<td>Identify isolation room for individuals exhibiting signs of the virus or illness. (CDC, 2020)</td>
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<tr>
<td>Maintain routine cleaning and disinfection of surfaces, especially high contact surfaces. (CDC, 2020)</td>
<td>PPE, hand soap, sanitizer and hand towel quantities should be obtained prior to opening with adequate amounts to support 60 days, with replenishment orders submitted every two weeks.</td>
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</table>
### PRACTICE SOCIAL DISTANCING AND PERSONAL HYGIENE

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<th>Employers should:</th>
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<td>Make sure that employees can maintain at least six feet of physical separation, including co-workers and customers.</td>
<td>Mark with signage or tape six-foot spacing for employees and customers to maintain appropriate distance from one another.</td>
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<tr>
<td>Regularly clean high-touch surfaces including doorknobs, light switches, shared equipment, toilet handles, sink faucets, and clock in/out areas.</td>
<td>Provide face coverings to employees.</td>
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</tr>
<tr>
<td>Provide hand sanitizer (with at least 60% alcohol) and sanitizing products for employees and customers.</td>
<td>Provide handwashing stations with soap, clean water, and single use paper towels and encourage frequent handwashing for 20 seconds or longer.</td>
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</table>

### MEDICAL MONITORING, TESTING PROTOCOLS AND EMPLOYEE COMMUNICATION

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<thead>
<tr>
<th>Implement a communication program to keep employees notified of CDC communicated symptoms list, and guidelines for self-reporting.</th>
<th>Engage medical provider resources that can make options available to employees such as telephonic medical resources and access to testing.</th>
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<tr>
<td>Evaluate and understand processes for screening/symptom checking vs. testing and develop policy.</td>
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### IMPLEMENT WORKPLACE CONTROLS USING THE “HIERARCHY OF CONTROLS” (OSHA, 2020)

<table>
<thead>
<tr>
<th>Engineering controls, such as physical barriers, increased ventilation, and altering job tasks to reduce exposure.</th>
<th>Safe work practices that promote infection control such as additional signage, hands-free or no touch operation of devices (faucets, trashcans, soap or sanitizer dispensers).</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administrative controls, such as alternating work schedules, discontinuing non-essential travel or replacing with virtual communications.</td>
<td>Complete job hazard analysis (JHA) for any roles that may have changed. (OSHA, 2020)</td>
</tr>
<tr>
<td>Consider OSHA regulations that may apply for written certification of workplace hazard assessment under the PPE standards. (OSHA, 2020)</td>
<td>PPE must be provided to workers with the potential to be exposed as part of their normal assigned job duties. Consider making PPE available to employees who may come in close contact with customers, vendors, or the general public. (OSHA, 2020)</td>
</tr>
</tbody>
</table>
IMPLEMENTATION OF EMPLOYEE POLICIES AND PROCEDURES BY ROLE AND FUNCTION

Leave Considerations

Each organization is unique and should take its individual circumstances into account when developing a “return to the workplace” plan. Leaders within the organization must remain focused on their employees’ physical and emotional wellbeing. It is not enough to establish physical safety measures — employers must also ensure employees feel safe.

- What human resources policies should be evaluated?

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<tr>
<th>Area</th>
<th>Issue/Concern</th>
<th>Considerations</th>
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</table>
| Absence and Leave     | Do you intend to limit paid time off (PTO) requests as you are ramping back up to normal operations? | • Employees may lose or forfeit PTO due to policy maximums/carry-over provisions  
• Change PTO maximum/carry-over policy provisions  
• Allow cash out of PTO to allow employees to reduce bank amounts rather than lose or forfeit PTO  |
|                       | How will you handle leave requests specific to COVID-19?                        | • Establish emergency leave form to be used for COVID-19-related leave                                                                 |
|                       | Do you need updates to your bereavement leave?                                 | • Revise bereavement leave policies                                                                                                                                               |
| Work From Home        | Do your current policies reflect new business environment?                     | • Review and revise work-from-home and child care policies as needed  
• Respond to employee requests to continue to work from home, including long-term arrangements  
• Update technology to support virtual workers  
• Examine long-term cost savings or impact of offering permanent remote work |
| Travel                | How will you reintroduce business travel?                                      | • Consult with your risk management team to review and revise corporate travel policies as needed  
• Define and begin with “essential business travel” only |

TAKEAWAY

Not all employees will be impacted physically by COVID-19, but many will be impacted by additional stress and mental strain. Ensuring your workplace is safe can help reduce employees’ stress and provides an opportunity to advance the conversation around mental health as well. A better environment is possible when employers address the return to the workplace holistically through a positive culture, transparent communications, empathetic and compassionate leadership, and proactive tools and resources.
### IMPLEMENTATION OF EMPLOYEE POLICIES AND PROCEDURES BY ROLE AND FUNCTION

#### Employment Considerations

- What additional areas of HR should be reviewed?

<table>
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<tr>
<th>Area</th>
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<tbody>
<tr>
<td><strong>Furlough Recall</strong></td>
<td>Recall or return to work letter/communication</td>
<td>• Provide employees with recall or offer letters that clearly articulate dates of furlough and dates of return; include confirmation of compensation and benefits eligibility; and instructions on how to confirm intention to return and related processes</td>
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<tr>
<td></td>
<td>Recall or return to work equality/adverse action/parity</td>
<td>• To ensure that all employees are treated fairly during the recall process, you should discuss your return to work/furlough recall plan with your counsel to ensure no adverse or negative impact against protected groups</td>
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<td></td>
<td>Shifts/staffing</td>
<td>• As you begin to return employees to a physical workspace, consider options for staggering shifts to help mitigate density of employees in common workspaces at any given time</td>
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<td></td>
<td>Benefits</td>
<td>• Review rehire/reinstate provisions for your benefit policies (eligibility/waiting periods)</td>
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<td></td>
<td>Refusal to return to work</td>
<td>• Have a process in place to communicate termination of employment to employees who refuse or are unable to return to work upon notice of a recall</td>
</tr>
<tr>
<td><strong>Re-Onboarding</strong></td>
<td>Line manager communication</td>
<td>• Managers have learned to change their behaviors and trust their teams to do the right things. Ensure they put people first and are equipped with the messages, tools and skills to help their teams face increased personal challenges during this time (bereavement and loss, child care and school-cancellation, financial stress, etc.)</td>
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<tr>
<td></td>
<td>Respect in the workplace</td>
<td>• When bringing employees back, consider the opportunity to reinforce expectations around respect in the workplace and remind employees about policies related to discrimination and confidentiality</td>
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<tr>
<td></td>
<td>Employee resources</td>
<td>• Be sure to promote and highlight your employee assistance programs (EAPs) and other wellness programs available to employees. If you don’t have these programs, considering adding</td>
</tr>
<tr>
<td></td>
<td>Employee communications</td>
<td>• Ensure that employees have a way to communicate their concerns quickly and confidentially</td>
</tr>
<tr>
<td></td>
<td>Executive communications</td>
<td>• Leaders have never put more emphasis on communication; make sure you don’t lose this and ensure leaders remain visible as the situation continues to evolve</td>
</tr>
</tbody>
</table>

#### TAKEAWAY

Leadership actions and behaviors will significantly influence how employees respond to the crisis, and their commitment to the organization.
### Staffing Waves

**Issue/Concern:** Do you have a plan to manage through expected waves of the pandemic?

**Considerations:**
- If your organization is impacted by COVID-19, you may need to go through several waves of layoff/furloughs/schedule changes to ensure safety of workforce and clients.
- Consider various staffing strategies, including shift staggering and cross training.
- Work with your business continuity and crisis response team to prepare to operate in phased waves as/if needed.

### Role Evaluation and Job Fit

**Issue/Concern:** Do job descriptions need to be updated?

**Considerations:**
- Think about how and if jobs have changed since the COVID-19 crisis. Are they being done remotely? Are there new technologies being utilized? Are there new standard operating procedures (SOPs) to be performed?

**Issue/Concern:** Do job changes impact qualification, experience and eligibility for roles?

**Considerations:**
- If there have been changes in how and where jobs are being performed, are people in the jobs still qualified or able to do the work as expected?

### Transition and Employee Exits

**Issue/Concern:** Do job changes impact employment?

**Considerations:**
- If employees are not able or unwilling to meet requirements of jobs that have changed, do you have a process in place to consider them for other internal opportunities?
- Do you have a strategy and program in place to manage termination of employment and related support programs?

### Performance Management

**Issue/Concern:** How does COVID-19 impact your 2020 performance management process?

**Considerations:**
- Do you have enough data to fairly evaluate employees for the year? If the job has changed as a result of COVID-19, are employees clear on what the new expectations are?
- Do they need a grace period during which to learn new processes or skills? In instances of significant change related to COVID-19 should you consider hitting pause on your performance management process in 2020?

**Issue/Concern:** Is your management team prepared to manage remotely?

**Considerations:**
- Do managers understand how to measure performance and success with changes to roles or with remote workers?

### Recruiting

**Issue/Concern:** Job postings, supporting technology and training for managers

**Considerations:**
- Have you considered the use of bots or artificial intelligence (AI) to assist in the vetting and candidate experience?
- Do you have a process and platform to enable remote/video interviews?
- Do you have a process to ensure that technology accessibility does not create issues with parity/discrimination?
- Have your hiring managers been trained on how to conduct interviews remotely via video and briefed on company expectations for professionalism and brand?
## Communications Considerations

During these trying times, employee considerations and claims are top of mind for many. A key approach to returning to work is to remember to connect and communicate consistently with your employees. Many will re-enter the workforce with fear and hesitancy, and it is the role of HR to ensure that all necessary considerations have been taken care of on their behalf so employees can continue their job without fear. HR must anticipate and stay ahead of the curve.

- **What should we be thinking about related to communications and employee engagement?**

<table>
<thead>
<tr>
<th>Area</th>
<th>Issue/Concern</th>
<th>Considerations</th>
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</thead>
<tbody>
<tr>
<td>Communications</td>
<td>Overall plan</td>
<td>• A clear communication plan will allow employees to understand how the organization plans to reopen or reestablish business processes</td>
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<tr>
<td></td>
<td>Policy communication</td>
<td>• Make sure that employees clearly understand all leave or other Families First Coronavirus Response Act (FFCRA) related policies and/or policy updates that are implemented in response to COVID-19 and state/local leave laws</td>
</tr>
<tr>
<td></td>
<td>Workplace social distancing</td>
<td>• In partnership with your facilities and risk management team, determine the appropriate social distancing and sanitation protocols for your organization and ensure they are clearly communicated via signage or audio announcements to both employees and visitors</td>
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<tr>
<td></td>
<td>HR policy</td>
<td>• Have communications ready for all new or revised HR policies to establish clear guidance, enhance employee confidence and reduce fear</td>
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<td></td>
<td>Anticipate media inquiries</td>
<td>• Prepare to respond to the media surrounding workplace policies, and in the event of workplace exposures (See Step 5 section of this guide)</td>
</tr>
<tr>
<td>Employee Engagement</td>
<td>Has employee engagement been impacted by the pandemic?</td>
<td>• Implement a full engagement survey or pulse survey to get a baseline evaluation for current levels of employee engagement, resiliency, burnout and overall commitment to the organization</td>
</tr>
<tr>
<td></td>
<td>Internal communication strategy</td>
<td>• The COVID-19 crisis has shown gaps in some organizations’ digital channels and will have a deep impact on collaboration. Develop an overarching internal communications strategy — it’s an opportunity to start from scratch and build channels and content around new ways of working.</td>
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<td></td>
<td>Re-engagement</td>
<td>• Focus on your purpose, culture and employee value proposition (EVP) — you need to rally everyone around a common goal</td>
</tr>
<tr>
<td></td>
<td>Wellbeing</td>
<td>• Think holistically about your employees’ wellbeing — it’s not just about physical, but emotional, financial and career</td>
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### Compensation Considerations

Practical guidance is needed now more than ever, especially when it comes to how employees are paid. Business operations, including compensation planning, require a personalized response. Now is the opportunity to reevaluate your current expense structure and consider what approach could be recommended to alleviate financial burden.

- What areas of compensation should be reviewed?

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<thead>
<tr>
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</table>
| Are you planning to continue or expand work-from-home as part of normal operations? | • Fair Labor Standards Act compliance (meal periods and overtime for non-exempt employees)  
• Lives-in, works-in city/county/state:  
  » Ordinances for leave laws, mainly paid sick leave  
  » Appropriate taxation, both local and state  
• Technology (telecommunications, devices, security, access)  
• Ability to check in on employees (IP address, productivity, instant messaging)  
• Maintain staffing to ensure seamless business operations  
• Determine which jobs are appropriate, and balancing internal equity  
• Engage employees to ensure a team culture |                                                                                                                                               |
| Do you have a formal plan in place to handle surge pay?               | • Create clear guidelines that identify when a unit is in surge capacity (vacancy and occupancy)  
• Outline standard pay criteria to ensure internal equity (eligible jobs and amounts)  
• If surge volumes are anticipated, consider early staffing commitments with surge values to ensure adequate coverage |                                                                                                                                               |
| How will you compensate employees if your workplace is temporarily closed due COVID-19? | • Create a policy that outlines how you will provide pay for that day and until business resumes for employees who cannot work from home  
• Be clear on expectations for reporting back to work and ensure managers have up-to-date contact lists and protocols  
• Identify means of compensation in sequential order so managers and employees can react according to their individual circumstances and provide “How To” guides |                                                                                                                                               |
| Do you have pay programs coming up that you will be able to execute (e.g., merit, management incentive, gain share bonus)? | • Determine your ability to execute vs. temporarily suspend programs  
• Create cascading communications to outline the rationale and impact to employees. Communications should identify when you will reassess and provide an organizational update |                                                                                                                                               |
| Do changes in job impact compensation?                                | • If there have been changes in how and where jobs are being performed, does the compensation need to be reviewed and updated to reflect those changes? Is incentive compensation still driving the desired behaviors? |                                                                                                                                               |
IMPLEMENTATION OF EMPLOYEE POLICIES AND PROCEDURES BY ROLE AND FUNCTION

Compliance and Benefits Considerations

As employers enter the next phase of their response to the COVID-19 pandemic, many questions may arise regarding how to keep organizations running while practicing sound risk management. Below are some important considerations related to your employees and their benefits as your organization tackles returning to the workplace.

• What areas of benefits compliance should we evaluate as we return to the workplace?

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<tr>
<th>Area</th>
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<tbody>
<tr>
<td>Compliance and Benefits</td>
<td>COVID-19 and employee benefits return to workplace action items</td>
<td>Benefits Return to Workplace Action Items</td>
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<tr>
<td></td>
<td></td>
<td>• Take preventive measures</td>
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<td>• Establish communications plan</td>
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<td></td>
<td>• Update health plan documents</td>
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<td></td>
<td>• Consider Patient Protection and Affordable Care Act (ACA) status issues</td>
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<td>• Establish reinstatement of coverage</td>
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<td>• Develop premium contributions</td>
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<td>Return to workplace employer considerations</td>
<td>Employer Considerations</td>
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<tr>
<td></td>
<td></td>
<td>• Can we return to work?</td>
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<td>• What preventive measures should we introduce?</td>
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<tr>
<td></td>
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<td>• What information should we communicate to employees?</td>
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<td></td>
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<td>• What implications should we consider for employees’ status under the ACA?</td>
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<td>• What should we consider when reinstating an employee’s benefits coverage?</td>
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<td>• What other issues should we consider?</td>
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<td>Read the top 10 most frequently asked questions from employers on returning to the workplace. ([Top 10 Employer Return to Workplace FAQs])</td>
</tr>
</tbody>
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TAKEAWAY

From preventive measures required to protect your employees to updating health plan benefit summaries to reinstatement of coverage, regulations from many government agencies are applicable or have been adjusted to account for the impact of COVID-19. To help your organization effectively anticipate and mitigate the risks associated with benefits and HR compliance, partner with a Gallagher compliance expert.
IMPLEMENTATION OF FACILITIES SANITIZATION, LIFE SAFETY, BUILDING SYSTEM AND SOCIAL DISTANCING POLICIES

Once you have decided to reopen, physical facility and equipment preparation will need to begin. It’s important to follow current and future local, state and federal CDC, National Fire Protection Agency (NFPA), American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) and OSHA guidelines. Documentation of the steps you are taking to prepare your facilities and communication to employees continues to be a critical part of the process. Facility design may require adjustments as well as occupancy limitations to maintain compliance with guidelines and best practices.

### PHYSICAL FACILITY PREPARATION

<table>
<thead>
<tr>
<th>All life safety systems should be checked to ensure proper operation (NFPA, 2020):</th>
<th>All critical building systems should be checked for proper operation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Fire alarm</td>
<td>• HVAC systems: increase air exchanges in the building if possible (ASHRAE, 2020)</td>
</tr>
<tr>
<td>• Emergency lighting systems</td>
<td>• Power systems</td>
</tr>
<tr>
<td>• Exit lights</td>
<td>• Security and fire protection systems, communication systems</td>
</tr>
<tr>
<td>• Fire extinguishers</td>
<td>• Water should be run to eliminate rusty or stale water</td>
</tr>
</tbody>
</table>

- Check all parking lots, sidewalks and equipment for slip, trip and fall hazards
- Check all lighting to ensure proper operation

<table>
<thead>
<tr>
<th>Employee congregation areas should be secured/managed based on current social distancing guidance (CDC, Social Distancing, Quarantine, and Isolation, 2020)</th>
</tr>
</thead>
</table>
- Post infection control and social distancing guidelines throughout the facility
- Prohibit access to areas where employees can congregate together (lunchrooms, cafeterias, large meeting spaces)
- Establish controls to maintain six feet of separation or utilize physical barriers in public spaces, equipment and restrooms

- All buildings should be properly cleaned and disinfected prior to re-opening (CDC, 2020)
- CDC guidelines should be followed for cleaning
- Replace HVAC filters (ASHRAE, 2020)
- Specific cleaning guidelines should be developed for various locations and surfaces

Key Actions Safety Checklist

**GOAL:**

Ensure your facilities can safely resume operations. This could include third-party cleaning and disinfection, facility safety checks, assessment of technology security, and the potential design and installation of new technologies intended to mitigate exposures from HVAC and other building systems.
ASSESS AND MANAGE OPERATIONS SUPPLY CHAIN AND THIRD-PARTY VENDORS

For your business to function properly, new considerations must be made for the globally impacted supply chain. The marketplace has changed and may necessitate partnering with new or additional vendors, and implementing contingency plans should a vendor be impacted during recovery.

Continue to communicate with your supply chain partners to ensure you have a back-up plan should there be a break down along the line. This may involve increasing inventory levels of high volume products/services. This also includes making sure your supply chain and vendors are in compliance with protocols and provide proper documentation to indicate ongoing safety checks and operational continuity.

**Key Actions**

**Safety Checklist**

**GOAL:**
A review of your systems and processes to ensure vendor compliance, identification of supply chain needs for increased PPE and sanitizer demands, and evaluation of how your organization’s compliance with current pandemic requirements can affect downstream customers and the public.

**OPERATIONS SUPPLY CHAIN CHECKLIST**

<table>
<thead>
<tr>
<th>Assess, budget and manage use of PPE and sanitizers</th>
<th>Managing suppliers and contractors (quantities, redundancies, performance and contractual obligations)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Determine PPE needs at each facility</td>
<td>• Examine vendor/contractor agreements for:</td>
</tr>
<tr>
<td>• Determine sanitizer needs at each facility based on recommended sanitation schedules (CDC, Cleaning and Disinfecting Your Facility, 2020)</td>
<td>» Performance obligations and variations</td>
</tr>
<tr>
<td></td>
<td>» Insurance requirements like changes in limits and coverage</td>
</tr>
<tr>
<td></td>
<td>» Modify agreements if necessary</td>
</tr>
<tr>
<td></td>
<td>• Establish redundancy vendor/contractor agreements</td>
</tr>
<tr>
<td></td>
<td>• Estimate stock quantities needed and improvement projects planned for upcoming quarter</td>
</tr>
<tr>
<td></td>
<td>• Notify primary vendors/contractors of modifications or deviations from previously agreed upon commitments</td>
</tr>
<tr>
<td></td>
<td>• Audit suppliers vendors/contractors to assess upstream exposures</td>
</tr>
<tr>
<td>Vendor and contractor management to mitigate exposure potential</td>
<td>Business continuity planning assistance, testing, and updating</td>
</tr>
<tr>
<td>• Review vendor/contractor access to facilities and interaction with employees</td>
<td>• Review and update business resiliency plan to ensure relevance</td>
</tr>
<tr>
<td></td>
<td>• Test business resiliency plan and develop prioritized corrective action plan</td>
</tr>
</tbody>
</table>
MAINTAINING CUSTOMER AND PUBLIC RELATIONSHIPS

Customers, clients and the public should be aware of the safeguards you have put in place to ensure their safety. Actively monitoring feedback from these stakeholders will help validate the safety measures put in place. A regular review of the changing safety recommendations from the CDC, OSHA, local, state and federal authorities, and other governing bodies within your jurisdiction will help ensure your organization’s compliance with health and safety mandates and requirements.

Now is the time to evaluate your communications channels with your customers and the public. Designate a point of contact or team that can facilitate responses to questions, concerns or responses in a timely way.

<table>
<thead>
<tr>
<th>CLIENT / CUSTOMER / PUBLIC RELATIONSHIP CHECKLIST</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conduct exposure assessments to determine contact points (OSHA, 2020)</td>
</tr>
<tr>
<td>• Assess scope of client/customer/public communication</td>
</tr>
<tr>
<td>• Develop customer waivers and notices</td>
</tr>
<tr>
<td>• Consider building occupancy limitations</td>
</tr>
<tr>
<td>• Consider facility layout/design modification to facilitate social distancing</td>
</tr>
<tr>
<td>• Review claims mitigation procedures and policies</td>
</tr>
<tr>
<td>• Actively monitor the interaction process to validate implemented safeguards</td>
</tr>
<tr>
<td>• Prepare to respond to the media surrounding workplace policies, and in the event of workplace exposures (CDC, 2020)</td>
</tr>
<tr>
<td>• Create visitor policy to safety allow vendors, customers and all visitors access to workplace</td>
</tr>
<tr>
<td>• Work with third-party contractor partners to ensure alignment and compliance with your policies</td>
</tr>
</tbody>
</table>

TAKEAWAY

Transparency and consistency is key to maintaining trust in these important relationships.
No matter where your organization stands in the COVID-19 pandemic, Gallagher has the insurance, risk management and consulting resources to help protect your people, your property and your profits.

Call your Gallagher consultant today to get the conversation started.