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RETURN TO WORK & RECOVERY GUIDE
MITIGATION RECOMMENDATIONS
POST-COVID-19
July 6, 2020 — v6

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NOTICE FROM KMS

Kansas Manufacturing Solutions (KMS) is one of 51 (w/ Puerto Rico) State-Based Centers in the MEP National Network. KMS' mission is to grow Kansas manufacturing by delivering solutions to small and medium sized manufacturers with value driven results.

As a trusted advisor to the manufacturers of Kansas, KMS provides a suite of services that create growth for manufacturers through increased profits, increased sales and the creation and retention of jobs.

In an effort to provide extended support of small & mid-sized manufacturers, KMS has developed this as a guide to return to work and recovery as you maintain, resume all or restart operations.

KMS' guide is based upon COVID-19 best practices, as recommended by the Centers for Disease Control & Prevention (CDC), the Occupational Safety & Health Administration (OSHA), The Kansas Department of Health and Environment, and other governmental regulations and guidelines as described in this document.

For questions regarding this document or for additional support, please contact us at – 913.649.4333 or info@wearekms.com

LEGAL DISCLAIMER

The purpose of this document is to recommend/suggest ideas that you may wish to consider as our industry and your business moves towards 100% reopening in the aftermath of the COVID-19 pandemic.

Keep in mind that there is no 'one size fits all' scenario.

Before you chose to implement any of the ideas suggested in this document you should evaluate and determine, with the assistance of your legal counsel, accounting and human resource teams, the legality and effectiveness of the potential application captured in this document.

As the overall intent of this document is to provide suggested ideas for your independent consideration only; KMS accepts no responsibility for any result or circumstance arising from or related to your decision to 'use or not use' any idea submitted herein.

This is to be considered a 'living' document which is subject to revision or further developments as they arise.

PURPOSE

To educate businesses and industry on the Return to Work (RTW) protocols and procedures implemented for safety and protection.

1. **Scope:**
   - To set expectations for employee behaviors that will help mitigate COVID-19 risk at work and at home
   - To provide employees information and resources regarding health and wellness

2. **General Overview:**
   - Objectives
   - Resuming Operations
   - Personal Protective Equipment (PPE)
   - Disinfection Protocol
   - Self-Distancing
   - Employee Monitoring
   - 'Possible' Positive for COVID-19
   - Signage
   - RTW Checklist
   - References

OBJECTIVES

To help ensure the health and wellness of each employee and visitor.

1. **Implementation of Measures:**
   a. Install additional sanitizing dispensers and guidelines (signage) for frequent cleaning on overly used surfaces and common areas
   b. Manage shift-changes and stagger lunch breaks to allow time to thoroughly disinfect common areas and to promote 'Social Distancing'
   c. Place signage throughout the facilities to remind employees of proper preventative measures

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2. **Establish Disinfection Protocols (Note – Disinfection Protocols on Page 13):**

   a. Disinfection measures need to be put in place and implemented either as part of the routine, or scheduled, to disinfect workplace surfaces, chairs, tables, etc. in order to protect employees

   b. Scheduled complete sanitization and disinfection of facilities – employing approved protocol

   c. Deep-cleaning and disinfection will be automatically triggered when an active employee tests positive for COVID-19 by a medical doctor

   d. Deep cleaning should be carried out by an external, professional service

   e. The 'baseline of clean' will be upheld

3. **Establishing Social Distancing Procedures:**

   a. Social Distancing is an effective method to help prevent the spread of the virus

   b. Staying (at least) 6-feet from others

   c. Eliminating select contact with others – handshakes, embracing co-workers, non-essential visitors, or friends

   d. Avoid touching commonly used surfaces

   e. Avoid individuals that appear ill

4. **Hazard Analysis for Cleaning Tasks and Wellness:**

   a. A Hazard Analysis is created to establish overall wellness and disinfection protocols for each work area. The Hazard Analysis must include:

      i. General Disinfection Measures

      ii. On-Site Health Screening

      iii. Daily Self-Screening

      iv. Self-Quarantine & Return to Work

      v. Visitors & Contractors Self-Screening

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EXPANDING OR RESUMING OPERATIONS

If a facility has been vacant for over 7-days, the need for a deep-clean is minimized. The longest the COVID-19 virus can live on a hard or soft surface is 5-days.

HOW LONG COVID-19 LIVES ON SURFACES

2-8 Hours	**ALUMINUM**		
	Soda Cans	Ladder	Computer Parts
4 Hours	**COPPER**		
	Coins	Plumbing Parts	Wires
1 Day	**CARDBOARD**		
	Boxes	Paper Towel Rolls	Toilet Paper Rolls
2-3 Days	**PLASTICS**		
	Elevator Buttons	Hard Hats	Safety glasses
	STAINLESS STEEL		
	Water Bottles	Refrigerators	Tools
4 Days	**WOOD**		
	Office Furniture	Doors	Pencils
Up to 5 Days	**GLASS**		
	Windows	Mirrors	Phone Screens
	PAPER		
	Magazines	Copy Paper	Notepads
5 Days	**METAL**		
	Doorknobs	Tools	Sinks
	CERAMICS		
	Mugs	Dishes	Pottery

SOURCE: https://www.webmd.com/lung/how-long-covid-19-lives-on-surfaces

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If a facility has not been closed and/or vacant for 7-days, the following steps should be taken:

1. **The company or an external professional service must clean the following:**

   a. All Hard Surfaces including – but not limited to:

Doorknobs	Water Fountains	Light Switches
Machine Switches	Tables/Chairs	Desks/
Sinks	Keyboards, etc.	Phones
Counter-Tops	Towel Dispensers	Faucets/Handles
Screens	Vending Machines	Common Area Objects
Forklift/Tuggers	Handrails	Machine Controls
Time Clocks	Turnstiles	Tools
All other high touch items		

   b. The company or an external professional service should clean with soap & water followed by the disinfecting with one of the following:

   i. Diluted household bleach solution – 1/3 cup of bleach to 1 gal of water

   ii. Alcohol Solution that is at least 70% alcohol

   iii. EPA registered household disinfectant

   c. While cleaning, employees or professional cleaning service should wear:

   i. Respiratory Protection, N95 or alternative classes of NIOSH approved respirators (OSHA N95 Guidance)

   ii. Eye protection such as safety glasses or face splash shields

   iii. Disposable gloves made out of latex, nitrile, or vinyl

   iv. Disposable gowns

   v. Specialized cleaning can be added and performed by company

2. **HVAC filters should be cleaned, disinfected, or replaced on schedule.**

3. **Before work begins, each employee should be informed of the following:**

   a. How the initial cleaning was completed

   b. How to protect oneself on a daily basis

   c. How to clean each workspace throughout the day

   d. Protocol for an employee testing positive for COVID-19

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4. **When at work, follow protocol of who to contact if feeling ill...**

    a. If the employee becomes sick during the day, they should be sent home immediately.

        i. Surfaces in their workspace should be cleaned and disinfected.

        ii. Information on persons who had contact with the ill employee during the time the employee had symptoms and 2 days prior to symptoms should be compiled. Others at the facility with close contact within 6 feet of the employee during this time would be considered exposed.

    b. Employees who appear to have symptoms (i.e., fever, cough, or shortness of breath) upon arrival at work or who become sick during the day should immediately be separated from other employees, customers, and visitors and sent home.

    c. If an employee is confirmed to have COVID-19 infection, employers should inform fellow employees of their possible exposure to COVID-19 in the workplace but maintain confidentiality as required by the Americans with Disabilities Act (ADA). The employer should instruct fellow employees about how to proceed based on the CDC Public Health Recommendations for Community-Related Exposure.

NOTE: To properly execute this plan, it is in the best interest of the company to establish a team or individuals or supervisors that will be given the authority to make decisions in the best interest of the company. During the 'Recovery & Return to Work' period, focus on monitoring employees, sanitation of the facility & equipment, and other essential duties described throughout this plan.

PERSONAL PROTECTION EQUIPMENT (PPE)

In addition to the normal everyday PPE based on job requirements, the company should provide, where/when required, the following:

1. **Respirators of N95 or alternative classes of NIOSH-Approved respirators OSHA N95 Guidance issued to:**

    a. Deep-Cleaning Staff

    b. Onsite Screening Team

    c. First Responders

    d. Employees with Broad Exposure:

        i. Cafeteria Workers

        ii. Security Guards

        iii. Receptionists

        iv. Shipping/Receiving Employees

        v. Employees working closer than 6-feet

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MASKS PROTECTION EFFICIENCY

2. **Face Splash Shields issued to:**
   a. Onsite Screening Team
   b. First Responders

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Face shields may serve as both PPE and source control:

- If helmets are being used, use face shields designed to attach to helmets
- Face shields can provide additional protection from both potential process-related splashes and potential person-to-person droplet spread
    - Safety glasses may fog up when used in combination with masks or cloth face coverings
    - Only some face shields are acceptable substitutions for eye protection (such as safety glasses) that are used for impact protection; facilities should consult with an occupational safety and health professional concerning the use of face shields
- Face shields can help minimize contamination of masks and cloth face coverings
- If used, face shields should be cleaned and decontaminated after each shift, and when not in use they should be kept in a clean location at the work facility
- If used, face shields should also wrap around the sides of the wearer's face and extend to below the chin

3. Gloves made of Latex, Nitrile, or Vinyl to:

a. Deep-Cleaning Staff

b. Onsite Screening Team

c. First Responders

d. Employees working closer than 6-feet

e. Respective personnel when recommended by the cleaning/disinfecting product being used

NOTE: The CDC indicated that gloves do not protect individuals against COVID-19 because the virus does not enter the body through the hands.

4. Disposable gowns issued to:

a. Deep-Cleaning Staff

b. Onsite Screening Team

c. First Responders

NOTE: Employers should

- Use videos or in-person visual demonstrations of proper PPE donning (putting on) and doffing (removal) procedures. (Maintain social distancing during these demonstrations.)
- Emphasize that care must be taken when putting on and taking off PPE to ensure that the worker or the item does not become contaminated
- Provide PPE that is either disposable (preferred) or, if reusable, ensure it is properly disinfected and stored in a clean location when not in use
- PPE worn at the facility should not be taken home or shared

5. **CDC recommends wearing cloth face coverings as a protective measure in addition to social distancing (i.e., staying at least 6 feet away from others). Cloth face coverings may be especially important when social distancing is not possible or feasible based on working conditions.**

NOTE: Cloth face coverings are not PPE. They are not appropriate substitutes for PPE such as respirators (like N95 respirators) or medical facemasks (like surgical masks) in workplaces where respirators or facemasks are recommended or required to protect the wearer.

Employers who determine that cloth face coverings should be worn in the workplace, including to comply with state or local requirements for their use, should ensure the cloth face coverings:

- Fit over the nose and mouth and fit snugly but comfortably against the side of the face
- Are secured with ties or ear loops
- Include multiple layers of fabric
- Allow for breathing without restriction
- Can be laundered using the warmest appropriate water setting and machine dried daily after the shift, without damage or change to shape (a clean cloth face covering should be used each day)
- Are not used if they become wet or contaminated
- Are replaced with clean replacements, provided by the employer, as needed
- Are handled as little as possible to prevent transferring infectious materials to or from the cloth
- Are not worn with or instead of respiratory protection when respirators are needed

DISINFECTION PROTOCOL

Guidance for distinction of hard, nonporous surfaces is to use one-part household bleach to ten-parts water solution (10% bleach solution). You may (also) use (5) tablespoons per gallon, or (4) teaspoons per gallon – per quart of water.

The solution **must be made daily** and left on a surface to clean of a minimum of 5-minutes.

A list of alternative household disinfectants can be found on the Environmental Protection Agency (EPA) website.

The EPA manages a pesticide registration which includes...

- List N: Disinfectants for the use against SARS-CoV-2 (COVID-19)

The following is provided for each disinfectant:

- EPA Registration Number
- Active Ingredients
- Product Name
- Company of Manufacture
- Directions to Follow for Comparable Virus Type
- Contact Time – Minutes the surface should be treated and visibly wet for duration of contact time
- Formulation Type
- Surface Types for Usage – Porous and/or Nonporous
- Use Site – Where the disinfectant may be used
- Emerging Viral Pathogen Claim – If yes, it is effective again a harder-to-kill virus than human coronavirus
- Date Added to List N

1. **Responsibility of the Employee:**

   a. To understand expectations, limitation, and processes for the responsibilities for decontamination

   b. Exercise Sanitary Practices – Limit the direct touching of objects, equipment, and surfaces in common areas

      i. Stagger handwashing to ensure 6 ft of social distancing is maintained during this activity to mitigate the spread of COVID-19

   c. Practice Good Personal Hygiene:

      i. Self-clean your work area before break, lunch, and end of shift

      ii. Wash hands multiple times per day with warm water and soap for (at least) 20-seconds

      iii. Cover coughs maintain social distancing and clean other visited areas

      iv. Where gloves are required per FDA regulations please continue to maintain current cGMPs

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v. Continue to ensure proper cGMPs are being followed by all employees (not touching face, nose, mouth, hair, changing gloves when soiled, etc.) to help mitigate the spread of germs

NOTE: These are important to keep yourself and others safe.

2. **Responsibility of Company:**

a. Train employees on decontamination expectations, including frequency, methods, and safety precautions

b. Develop protocol for decontaminating machinery/equipment, common areas, offices, and other occupied areas

c. Ensure adequate supply of approved decontamination materials

d. Determine the limit of for company, employee and when a third-party is used

e. Prevent the shaking of clothes and appropriate PPE to reduce the risk of contamination. In accordance with manufacturer's recommendations wash using warm water, drying completely and potentially use of a disinfectant from EPA's List N. Special consideration shall be given for certain items (i.e. flame retardant or resistant clothing)

f. Consider improving the engineering controls using the building ventilation system

Decontamination Frequency Accountability Chart

AREA	DESIGNATED RESPONSIBLE PARTY	DECONTAMINATION AGENT	CONTACT TIME	FREQUENCY
Desk / Office	Individual Employee	Appropriate diluted bleach solution or another agent from List N	List agent corresponding time according to List N	Twice a day, prior to lunch, and end of day
Work Area	Individual Employee			Prior to breaks and lunch. At end of day
Common Areas	Cleaning Crew			Before and after occupancy (i.e., meetings, breaks, lunch)
Isolation Area	Cleaning Crew			After each occupancy

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3. **Emergency Procedures**

Reference Procedures for Suspected Infections...

- If decontamination is not feasible, consider a 72-hour shutdown to allow the virus to naturally deactivate.

SELF-DISTANCING

Self-Distancing, also known as Social Distancing, is one of the primary ways to avoid contracting a virus or contamination. It is imperative that employees maintain proper self-distancing as recommended by the CDC and other health organizations. This means that a minimum of 6-feet must be maintained between employees. This procedure should be continued even when workers are wearing PPE.

Also, avoid gathering in groups, entering crowded areas, carpooling with others outside of your home, hugging, shaking hands, eating face-to-face and similar activities that would put you and/or others in close proximity and increase the risk of contamination

NOTE: See CDC Social Distancing Guidelines.

Prior to resuming operations, duties that require employees to work within 6-feet of each other must be evaluated using the companies Hazard Analysis for potential health and wellness risks. This is to ensure protection for each employee.

The following instructions are established to help maintain proper self-distancing:

1. **Workstations:**

   a. Remain isolated when possible

   b. Maintain 6-feet of separation between yourself and the nearest co-worker at all times

   c. Companies must ensure that desks are not facing each other unless guarded by a cubicle wall of similar barriers

   d. Designate one-way walking paths including offices, warehouses, storage areas or similar where traffic is common and other safety protocols will not be impacted

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e. Duties that require employees to work within 6-feet of each other or if workstations do not allow 6-feet of separation, requite the following:

   i. Use of barriers – plexiglass, cardboard, plywood or other similar materials

   ii. Engineering Controls must be considered prior to work beginning, including the option of eliminating duties (if practical/possible), until the outbreak has subsided

   iii. Redesigning jobs to allow duties to be completed by one person, introducing tools to assist with jobs that allow 6-feet of distance or any other option that allows work to be completed while maintaining the proper distance

   iv. If work **cannot** be redesigned then employees must be provided with the proper face mask, face shield, & gloves to avoid contact of the skin on tools. This would include any additional PPE that would be deemed essential to protect health of the employee

   v. Immediately following duties that require work of close proximity, all employees shall properly remove PPE without touching the outside of said PPE. Then wash hands & face thoroughly for a minimum 20-seconds with soap and water

NOTE: Hand Sanitizer can be used as long as it contains a minimum of 60% alcohol. A 60% alcohol solution is allowable for personal hygiene, but a 70% solution is needed for surfaces, equipment, and tools.

f. Avoid sharing equipment and tools – when possible

g. When equipment is shared, such as powered industrial trucks, ladders, rolling carts, copy machines, computers, etc. – the operator is required to properly disinfect after use

h. Prior to shift changes, the employee working is required to properly disinfect the workstation and equipment

i. Avoid coming within 6-feet of outside personnel – including those making deliveries (i.e. truck drivers, parcel delivery, post office) – or other individuals coming onsite

   i. Do not receive items directly from delivery personnel. Rather, allow the driver to place items down and back away

   ii. If the dolly or hand truck is used by delivery personnel within the facility, ensure that it is disinfected immediately afterwards

j. During training and meetings, a minimum of 6-feet must be maintained by employees

k. Employees shall not sit directly across from one another

2. Breakrooms:

a. Employees must maintain proper self-distancing

b. Employees shall not sit directly next to or across from one another

c. Minimize touching objects such as vending machines, coolers, refrigerators, and other commonly shared breakroom items

d. When breakroom items are touched...employee must wash hands

e. Prior to exiting the breakroom, properly disinfect all items encountered

f. If possible, remove doors

g. When possible, use separate doors to enter and exit the breakroom to avoid close proximity with others

3. Lunch Area/Cafeterias:

a. All breakroom guidelines apply

b. Encourage employees to bring their own lunch so no more communal sharing- such as hot buffet/ cafeteria lunch program) etc. and discourage drop- off food deliveries to maintain social distancing and spread of COVID-19

c. The use of disposables such as plates, cups and utensils are deemed a 'Best Practice'

d. Self-Service must not be allowed at this time

4. Restrooms:

a. Social distancing guidelines must be maintained in restrooms, including waiting in lines

b. All employees must properly disinfect hands when finished

c. Restrooms must stay sanitary – dispose of paper products properly and completely flush toilets

d. If possible, remove doors

e. If possible, restroom doors shall remain open to avoid repeated contact by employees

f. If possible, restroom require pathways that avoid close proximity of employees

5. Shift Changes:

a. Do **not** congregate in parking lots or other areas prior to or after shifts

b. Maintain 6-feet of distance while entering or exiting facility

c. If possible, one-way entry and exits should be established

d. If possible, entry and exit Doors should remain open during shift changes

e. Avoid touching the time clock bare-handed, use gloves

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MONITOR & DETECTION

One of the key difficulties about COVID-19 is the long incubation period. This is the period between initial infection and the onset of visible symptoms. One can be harboring the virus inside his/her body and not know it. During this time, it is possible to spread the virus to others (CDC – Protecting Yourself and Others).

Should self-distancing fail to prevent the spread of the virus, it is also important that employees be monitored/observed/screened for the display of symptoms.

This can include several aspects:
- Self-Screening
- Observation of symptoms by co-workers
- Monitoring of symptoms (including fever) by employer

1. **Self-Screening at Home:**
One of the most vital aspects of detection involves self-screening. In order to adequately communicate these procedures to employees, the employer should issue a self-screening checklist for all employees to conduct voluntary, home self-screening prior to returning to work (CDC – Guidance for Business Plan & Response)

The screening should consist of the following questions:

- Do you have a temperature of 100.4 Fahrenheit or greater?
- Do you have a cough?
- Are you experiencing shortness of breath?
- Are you having difficulty breathing?
- Are you experiencing unusual fatigue?

If the answer to any of these questions is 'YES", employees are requested to stay at home until ALL THREE of the following are true:
- You have been fever free for (at least) 72-hours (3 full days) without taking medication such as acetaminophen or aspirin to reduce fever

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- Other symptoms (cough or shortness of breath) are gone
- It has been (at least) 7-days since your symptoms first appeared, or you have tested negative for COVID-19 and applied protocols

2. **Observation of Symptoms at Work:**

Employees who appear to have symptoms (i.e., fever, cough, or shortness of breath) upon arrival at work or who become sick during the day should immediately be separated from other employees, customers, and visitors and sent home.

If an employee is confirmed to have COVID-19 infection, employers should inform fellow employees of their possible exposure to COVID-19 in the workplace but maintain confidentiality as required by the Americans with Disabilities Act (ADA). The employer should instruct fellow employees about how to proceed based on the CDC Public Health Recommendations for Community-Related Exposure.

3. **Monitoring by Employer:**

Employers have the authority to set up a monitoring station at the facility's entrance. In addition, a monitoring station may be set up in the parking lot entrance (CDC – Employers' Guidance).

If Implemented – please consider the following:

a. Employing a health screening team that will monitor symptoms of individuals entering the facility

b. Close alternative entrances to ensure all employees pass through the monitoring system

c. Use no-touch thermometers to evaluate employee's body temperature

d. Check temperatures of workers at the start of each shift to identify anyone with a fever of 100.4°F or greater (or reported feelings of feverishness). Ensure that screeners:

    i. Are trained to use temperature monitors and monitors are accurate under conditions of use (such as cold temperatures)

    ii. Wear appropriate PPE

e. Do not let employees enter the workplace if they have a fever of 100.4°F or greater (or reported feelings of feverishness), or if screening results indicate that the worker is suspected of having COVID-19.

    i. Encourage workers to self-isolate and contact a healthcare provider

    ii. Provide information on the facility's return-to-work policies and procedures

    iii. Inform human resources, employer health unit (if in place), and supervisor (so the worker can be moved off schedule during illness and a replacement can be assigned, if needed)

PROCEDURES FOR SUSPECTED INFECTION

Employers should assess hazards that employees may be exposed to, evaluate the risk of exposure and select / implement / ensure employees use controls to prevent exposure.

Control measures may include a combination of engineering and administrative, safe work practices and PPE.

1. **Identification & Isolation:**

   a. Identification & isolation of potentially infected individuals is a critical first step in protecting workers, visitors, and others

   b. Immediately isolate individuals suspected of having the COVID-19 virus (based on the Identification routes captured earlier in this document). This should be an area away from others and able to have a closed door

   c. Take steps to limit the spread of the individual's respiratory secretions by providing a face mask or other facial covering. A surgical mask is a 'Best Practice' if available

   d. Restrict the number of individuals entering the isolation area

   e. Protect employees in Close Contact* with sick individuals by using additional engineering and administrative controls, safe work practices and PPE

NOTE: CDC defines Close Contact as being within 6-feet of an infected person while not wearing the proper PPE. Also, Close Contact also includes direct contact within infectious secretions while not wearing the proper PPE. Close Contact does not generally include brief interactions like walking past a person.

2. **Following Isolation:**
   After isolation, the next steps depend on the workplace. For example – in most workplaces:

   a. Isolated individuals should leave the worksite as soon as possible depending on the severity of their illness, the other employees have choices:

      i. May be able to return home.

      ii. May choose to seek medical care on his/her own.

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3. Environmental Cleaning & Decontamination:

When individuals touch a contaminated surface or object and then touch their own eyes, nose, or mouth, they may expose themselves to the virus. Extreme Caution must be taken to avoid this exposure.

4. OSHA Enforcement Guidance for Recording Cases of COVID-19

Under OSHA's recordkeeping requirements, COVID-19 is a recordable illness, and thus employers are responsible for recording cases of COVID-19, if:

a. The case is a confirmed case of COVID-19, as defined by the Centers for Disease Control and Prevention (CDC)
b. The case is work-related as defined by 29 CFR § 1904.5; and
c. The case involves one or more of the general recording criteria set forth in 29 CFR § 1904.7.

OSHA is exercising its enforcement discretion in order to provide certainty to employers and workers. Accordingly, until further notice, OSHA will enforce the recordkeeping requirements of 29 CFR 1904 for employee COVID-19 illnesses for all employers according to the guidelines below. Recording a COVID-19 illness does not, of itself, mean that the employer has violated any OSHA standard. And pursuant to existing regulations, employers with 10 or fewer employees and certain employers in low hazard industries have no recording obligations; they need only report work-related COVID-19 illnesses that result in a fatality or an employee's in-patient hospitalization, amputation, or loss of an eye.

Because of the difficulty with determining work-relatedness, OSHA is exercising enforcement discretion to assess employers' efforts in making work-related determinations.

In determining whether an employer has complied with this obligation and made a reasonable determination of work-relatedness, Certified Safety & Health Officials (CSHOs) should apply the following considerations:

a. *The reasonableness of the employer's investigation into work-relatedness.* Employers, especially small employers, should not be expected to undertake extensive medical inquiries, given employee privacy concerns and most employers' lack of expertise in this area. It is sufficient in most circumstances for the employer when it learns of an employee's COVID-19 illness:

i. to ask the employee how he believes he contracted the COVID-19 illness;
ii. while respecting employee privacy, discuss with the employee his work and out-of-work activities that may have led to the COVID-19 illness; and

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iii. review the employee's work environment for potential SARS-CoV-2 exposure. The review should be informed by any other instances of workers in that environment contracting COVID 19 illness.

b. *The evidence available to the employer.* The evidence that a COVID-19 illness was work-related should be considered based on the information reasonably available to the employer at the time it made its work-relatedness determination. If the employer later learns more information related to an employee's COVID-19 illness, then that information should be taken into account as well in determining whether an employer made a reasonable work-relatedness determination.

c. *The evidence that a COVID-19 illness was contracted at work.* CSHOs should take into account all reasonably available evidence, in the manner described above, to determine whether an employer has complied with its recording obligation. This cannot be reduced to a ready formula, but certain types of evidence may weigh in favor of or against work-relatedness. For instance:

i. COVID-19 illnesses are likely work-related when several cases develop among workers who work closely together and there is no alternative explanation.

ii. An employee's COVID-19 illness is likely work-related if it is contracted shortly after lengthy, close exposure to a particular customer or coworker who has a confirmed case of COVID-19 and there is no alternative explanation.

iii. An employee's COVID-19 illness is likely work-related if his job duties include having frequent, close exposure to the general public in a locality with ongoing community transmission and there is no alternative explanation.

iv. An employee's COVID-19 illness is likely not work-related if she is the only worker to contract COVID-19 in her vicinity and her job duties do not include having frequent contact with the general public, regardless of the rate of community spread.

v. An employee's COVID-19 illness is likely not work-related if he, outside the workplace, closely and frequently associates with someone (e.g., a family member, significant other, or close friend) who (1) has COVID-19; (2) is not a coworker, and (3) exposes the employee during the period in which the individual is likely infectious.

vi. CSHOs should give due weight to any evidence of causation, pertaining to the employee illness, at issue provided by medical providers, public health authorities, or the employee herself.

If, after the reasonable and good faith inquiry described above, the employer cannot determine whether it is more likely than not that exposure in the workplace played a causal role with respect to a particular case of COVID-19, the employer does not need to record that COVID-19

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illness. In all events, it is important as a matter of worker health and safety, as well as public health, for an employer to examine COVID-19 cases among workers and respond appropriately to protect workers, regardless of whether a case is ultimately determined to be work-related.

CSHOs will generally refer to CPL 02-00-135, Recordkeeping Policies and Procedures Manual (Dec. 30, 2004), and CPL 02-00-163, Field Operations Manual (Sept. 13, 2019), Chapters 3 and 6, as applicable. The following additional specific enforcement guidance is provided for CSHOs:

• COVID-19 is a respiratory illness and should be coded as such on the OSHA Form 300. Because this is an illness, if an employee voluntarily requests that his or her name not be entered on the log, the employer must comply as specified under 29 CFR § 1904.29(b)(7)(vi).

SIGNAGE

Signage is an inexpensive component that can be used to help convey important information. Below are some ideas on how to create your own sign, and a few examples of signs that you can print for free.

1. **Facility Sign Type**
    - Letter Size
    - 8 ½" x 11" / A4
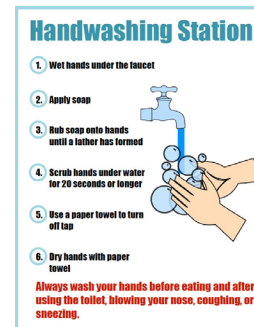   - Orientation Portrait (vertical)
    - Material – Regular Paper

2. **Poster Size**
    - 30" x 40"
    - Orientation Portrait (vertical)
    - Material – Foam Core
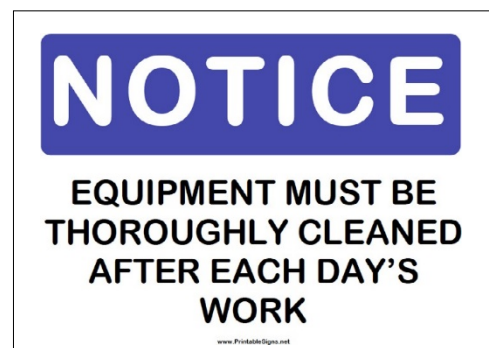
3. **Location Suggestions:**
   - Outside & Inside Exterior Doors
   - Cafeteria Entrances
   - Outside & Inside Restrooms
   - Throughout Plant & Office

Signage Examples from printablesigns.net
CDC also has signage at https://www.cdc.gov/coronavirus/2019-ncov/communication/print-resources.html

RETURN TO WORK

Before returning to work put a contingency plan into place, determine how you will operate if absenteeism spikes from increases in sick employees, those who stay home to care for sick family members, and those who must stay home to watch their children if dismissed from childcare programs and K-12 schools.

- Plan to monitor and respond to absenteeism at the workplace
- Implement plans to continue your essential business functions in case you experience higher than usual absenteeism
- Prepare to institute flexible workplace and leave policies
- Cross-train employees to perform essential functions so the workplace can operate even if key employees are absent

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Return to Work Checklist

	Cleaning Crew received training about the disinfection method and frequency	☐
	10% chlorine bleach solution (sodium hypochlorite solution) made daily, used when appropriate	☐
	Cleaning conducted on all common work surfaces, offices, and conference room	☐
	Cleaning conducted in break areas (dispensers, vending machines, etc.)	☐
	Cleaning conducted in all company vehicles and equipment	☐
	Cleaning conducted on floors, walls, multi-use areas, and restrooms	☐
	Clean, disinfect or replace HVAC filters	☐
	Social distancing protocol in place to prevent close proximity of employees includeing one-way paths	☐

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COVID-19 (CORONAVIRUS) – RESOURCES

Kansas Manufacturing Solutions (KMS) has compiled this partial list of resources to support economic retention and recovery related to COVID-19 Coronavirus.

We are working with our local and federal partners on response efforts and how to support Kansas manufacturers through this crisis.

Below are resources that may help you as you make decisions regarding your employees, business management, supply chain and customers. Please reach out if you have questions or need assistance.

Visit www.wearekms.com/covid-19-resources-for-manufacturers for more information and resources for manufacturers about COVID-19.

Additional Resources

- Protecting Your Business From COVID-19 (KMS)
- KMS / CIRAS - Supply Disruption Planning Checklist (KMS and CIRAS)
- KMS Crisis Management Recommendations (KMS and IMEC)
- Creating an Infectious Disease Outbreak Response Plan (KMS and CDC)

CDC Guidance

- Latest Updates from the CDC (CDC)
- How COVID-19 Spreads (CDC)
- Prevention and Treatment (CDC)
- What to Do if You Are Sick (CDC)
- Environmental Cleaning and Disinfection Recommendations (CDC. Updated 4.1.20)
- COVID-19 Information for Travelers (CDC)
- Preventing Spread in Communities (CDC)
- Sign up for CDC Email Updates (CDC)

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Occupational Safety and Health Administration (OSHA) Resources

- [Occupational Safety and Health Administration](#) (OSHA) Resources include Key OSHA standards for COVID-19
- [Guidance on Preparing Workplaces for COVID-19](#) (OSHA)
- [Disinfectants for Use Against COVID-19](#) (EPA)

Kansas Department of Health and Environment

- [Kansas Department of Health (KDHE) and Environment Coronavirus Disease 2019 (COVID-19): Frequently Asked Questions](#)
- [Kansas Coronavirus Case Summary and Map](#) (KDHE)

The World Health Organization (WHO)

- [Basic Protective Measures Against COVID-19](#) (WHO)
- [Getting Your Workplace Ready for COVID-19](#) (WHO. Updated 3.19.20)
- [Phishing Emails & Scam Alert](#) (WHO)
- [Myth Busters](#) (WHO)

National Association of Manufacturers

- [NAM's Coronavirus Resources](#)
- [NAM's COVID-19 Policy Action Plan](#)
- [NAM's Response to Senate letter to business groups](#)
- [NAM's Request for Guidance from the CDC](#)
- [NAM Member Coronavirus Survey Results](#)

Food Manufacturing Precautions

- [FDA Food Safety & COVID-19](#)
- [FDA Coronavirus (COVID-19) Supply Chain Update](#)
- [USDA Specific FAQ's](#)
- [List of Products that Meet EPA's Criteria for Use Against SARS-CoV-2, the cause of COVID-19](#)

Critical Supply Chain Resources and Contacts

- [FEMA Coronavirus (COVID-19) Pandemic Response](#)
- [State of Kansas Procurement Form for Critical Supplies (Kansas.Gov)](#)

Insurance

- [Bulletin about insurance related to Coronavirus (COVID-19) Coverage](#) from the Kansas Office of the Commissioner of Insurance
- [Additional Resources from the National Association of Insurance Commissioners (NAIC)](#)

Families First Coronavirus Response Act (FFCRA)

- [FFCRA from Department of Labor](#) (DOL)
- [FFCRA Q/A from Department of Labor](#) (DOL)

Coronavirus Aid, Relief, and Economic Security (CARES) Act

- [Small Business Owner's Guide to the CARES Act](#) (US Senate Small Business Committee)
- [US Chamber of Commerce Small Business ELA Loan Guide](#) (updated April 23rd. US Chamber)
- [PPP Borrower Information FAQ](#) (UPDATE May 27, 2020. Department of Treasury)
- [Guide to PPP Loan Forgiveness](#) (6.18.20)
- [PPP Loan Forgiveness Application](#) (EZ) (6.18.20)
- [SBA PPP Webpage](#) (SBA)

APPENDIX 1:
# RETURN TO WORK AND RECOVERY CHECKLIST

What can I do to keep my workers safe at the workplace and limit the spread of COVID-19?

This Return to Work & Recovery Checklist During COVID-19 represents the current thinking of Kansas Manufacturing Solutions (KMS) on this topic. It does not establish any rights for any person and is not binding on KMS or the public. You can use an alternative approach if it satisfies the requirements of the Checklist.

Employers are facing unprecedented challenges in responding to COVID-19 and its implications for their workplaces in the United States. The checklist below will assist in thinking through the issues most likely to need attention in the immediate future. Information, agency guidance, and potential responses to COVID-19 are changing rapidly.

Please note: These are suggested directions and protocols that manufacturers can use as a checklist for their own return-to work instructions. This checklist can be customized for your company's situation.

KMS cannot warrant that this checklist will satisfy all health and safety protocols needed for your own workplace situations. However, it does follow CDC and OSHA guidelines. Each company should review this document and revise the protocols as necessary to be able to provide sufficient protection to themselves and their employees as they return to work and conduct operations in a COVID-19 risk managed environment.

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	Status (Y/N/NA)	Date & Time	Employee Initials	Verification Initials
SOCIAL DISTANCING				
• Place posters around the workplace on keeping at least 6 feet between everyone at the workplace.				
• Display signs at the entrances to elevators and meeting rooms.				
• Check to ensure workstations, desks, and tables in breakrooms comply with social distancing.				
• Remind workers to have meetings by phone or online instead of in person.				
• Designate an isolation area at the workplace to quarantine employees showing symptoms.				
• Review delivery schedule and request contactless delivery.				
• Ensure social distancing markers are on the floor in areas where customers line up or where workers perform tasks.				
CLEANING				
• Ensure all necessary areas have PPE.				
• Remind workers to wear gloves when cleaning.				
• Check to ensure frequently touched areas and surfaces are cleaned.				
• Remind workers that they are responsible for cleaning personal property that comes to work with disinfectant.				
• Normal routine cleaning with soap and water will decrease how much of the virus is on surfaces and objects, reducing the risk of exposure.				
• Disinfection using EPA-registered disinfectants can also help reduce the risk. Frequent disinfection of surfaces and objects touched by multiple people is important.				
• When EPA-registered disinfectants are not available, alternative disinfectants can be used (for example, 1/3 cup of bleach added to 1 gallon of water, or 70% alcohol solutions). Do not mix bleach or other cleaning and disinfection products together. This can cause fumes that may be very dangerous to breathe in. Keep all disinfectants out of the reach of children.				
	Status (Y/N/NA)	Date & Time	Employee Initials	Verification Initials

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HANDWASH & HYGIENE

• Refill hand sanitizer stations at entry and exit points around the workplace.				
• Ensure bathrooms are well stocked with hand wash and paper towel.				
• Place posters with instructions on how to hand wash.				
• Remind workers on other ways to limit the spread of germs.				
• Set and update automatic alerts on computer systems to remind workers about washing hands and not touching eyes, nose, and face.				
• Remind workers to limit contact with others—no shaking hands or touching objects unless necessary.				
• Remind workers to wear appropriate personal protective equipment (PPE) and face masks, as necessary.				

MONITOR SYMPTOMS

• Place signs about the symptoms of COVID-19 in the workplace.				
• Remind workers to stay home if they are sick.				
• Remind workers to tell you if they are displaying symptoms of COVID-19, have been in close contact with a person who has COVID-19 or have been tested for COVID-19.				
• Remind staff of their leave entitlements if they are sick or required to self- quarantine.				
• Take temperatures of all employees and visitors each day and monitor any issues.				

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	Status (Y/N/NA)	Date & Time	Employee Initials	Verification Initials
DOCUMENTATION & TRAINING				
• Per the CDC guidance educating workers performing cleaning, laundry, and trash pick-up to recognize the symptoms of COVID-19 and document all training for record keeping purposes.				
• Documents maintained and completed for monitoring symptoms of COVID-19.				
• Documents maintained and completed for cleaning for COVID-19.				
• Documents maintained and completed for sanitation and/or disinfection for COVID-19.				
PLAN AHEAD				
• Revisit the plan to ensure business continuity if there is a suspected or confirmed outbreak of COVID-19 in your workplace.				
• Maintain stock of cleaning products and personal protective equipment available to disinfect your workplace following an outbreak.				
• Revisit the protocol for reopening your workplace after an outbreak or quarantine period.				

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APPENDIX 2:
SELF AUDIT CHECKLIST

As state and local governments grapple with the complex struggle between protecting public health and rebooting their economies, manufacturers also need to be preparing for the long, unmapped road ahead.

KMS has already shared their comprehensive Back to Work and Recovery Guide, which includes suggestions and recommendations using resources from the CDC, OSHA, and FDA. We created this Self-Audit so that you see where you may need assistance in keeping your employees, visitors, and facilities safe.

Inspection

Management Committee

Is there a Covid-19 Crisis Management Committee in your workplace?

◯ Yes   ◯ No

Process & Procedures

Have you released internal communications on staff noticeboards for all relevant Covid-19 updates?

◯ Yes   ◯ No

Have all employees been briefed on the guidelines around temporary remote working??

◯ Yes   ◯ No

Employers should consider changes to reduce overcrowding, such as facilitating remote work, shift work, and perhaps physical layout changes. Such measures may help protect workers from infection and help protect organizations from liability.

Do you have reliable systems for real-time public health communication with employees?

( ) Yes   ( ) No

Have your Supervisors been adequately trained on the implications of Covid-19?

( ) Yes   ( ) No

Have you given employees accurate information about ways to prevent the spread of infection?

( ) Yes   ( ) No

Are your employees aware of the symptoms of Covid-19?

( ) Yes   ( ) No

Symptoms of coronavirus to look out for are:

a. A cough

b. A high temperature

c. A shortness of breath

Cleaning and Personal Hygiene

Have you reviewed the cleaning measures to ensure that high risk contact areas and touch points are being regularly disinfected?

( ) Yes   ( ) No

You should ensure that public surfaces such as counters, doorknobs, and elevator buttons are regularly disinfected!

Have you followed CDC guidance for cleaning and disinfecting hard surfaces?

( ) Yes   ( ) No

For disinfection, diluted household bleach solutions, alcohol solutions with at least 70% alcohol, and most common EPA-registered household disinfectants should be effective. Diluted household bleach solutions can be used on hard, non-porous surfaces. Ensure proper ventilation.

Prepare a bleach solution by mixing:
5 tablespoons (1/3rd cup) bleach per gallon of water or 4 teaspoons bleach per quart of water

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Have you followed CDC guidance for cleaning and disinfecting soft (porous) surfaces?

◯ Yes   ◯ No

For soft (porous) surfaces such as carpeted floor, rugs, and drapes, remove visible contamination if present and clean with appropriate cleaners indicated for use on these surfaces.

Have appropriate items been laundered following CDC guidance?

◯ Yes   ◯ No

If the items can be laundered, launder items in accordance with the manufacturer's instructions using the warmest appropriate water setting for the items and then dry items completely.

Do not shake dirty laundry; this minimizes the possibility of dispersing virus through the air.

Clean and disinfect hampers or other carts for transporting laundry according to guidance above for hard or soft surfaces.

Personal Protective Equipment (PPE) and Hand Hygiene

Have you alerted all staff members to the hand washing protocols with your workplace?

◯ Yes   ◯ No

As hand washing is one of the most effective defenses, employers need to make sure that employees have ready access to washing facilities and that those are kept well stocked with soap and (ideally) paper towels.

Follow these steps every time.

1. Wet your hands with clean, running water (warm or cold), turn off the tap, and apply soap.

2. Lather your hands by rubbing them together with the soap. Lather the backs of your hands, between your fingers, and under your nails.

3. Scrub your hands for at least 20 seconds. Need a timer? Hum the "Happy Birthday" song from beginning to end twice.

4. Rinse your hands well under clean, running water.

5. Dry your hands using a clean towel or air dry them.

Do you have readily available access to Hand Sanitizer for all members of staff?

◯ Yes   ◯ No

Does the Hand Sanitizer contain at least 60 percent alcohol content?

◯ Yes   ◯ No

It is imperative that all employees have access to Hand Sanitizer!

Are staff members wearing disposable gloves and gowns for all tasks in the cleaning process, including handling trash?

◯ Yes   ◯ No

Gloves and gowns should be removed carefully to avoid contamination of the wearer and the surrounding area. Be sure to clean hands after removing gloves. Cleaning staff should immediately report breaches in PPE (e.g., tear in gloves) or any potential exposures to their supervisor.

Are staff members following normal preventive actions while at work including cleaning hands and avoiding touching eyes, nose, or mouth with unwashed hands?

◯ Yes   ◯ No

Business Travel

Have you considered reviewed policies around international and domestic business travel?

◯ Yes   ◯ No

Have you postponed or canceled scheduled conferences or meetings?

◯ Yes   ◯ No

Checklist for Visitors and Employees

Screening

ALL individuals (employees, family, visitors, government officials) entering the building must be asked the following questions:

Has this individual washed their hands or used alcohol-based hand rub (ABHR) on entry?

( ) Yes   ( ) No

Ask the individual if they have any of the following respiratory symptoms? (If YES to any, restrict them from entering the building)

☐ Fever   ☐ Sore throat   ☐ Cough   ☐ New shortness of breath

If NO to all, is the individual an employee of this institution?

( ) Employee ( ) Non-employee

Risk Assessment

General
Enter the worksite where the risk assessment is conducted

Risks and Recommendations
What risk have you observed and identified:

Identify the type of exposure:

Risk rating

☐ High   ☐ Medium   ☐ Low   ☐ No Identifiable Risk

Control measures and actions required:

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What risk have you observed and identified:

Identify the type of exposure:

Risk rating

☐ High ☐ Medium ☐ Low ☐ No Identifiable Risk

Control measures and actions required:

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