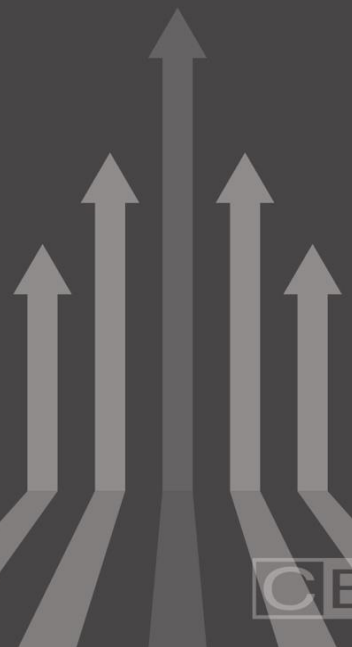




COTTINGHAM & BUTLER

# Return to Work:

## COVID-19 Considerations for Employers



# RETURN TO WORK CHECKLIST

The following checklist includes various actions employers may consider when reopening their physical work locations. This document includes a number of COVID-19 employment and return-to-work recommendations however, because the pandemic is a fluid situation and employer situations vary greatly, we also suggest employers follow the recommended guidance as communicated by federal, state and local governments.

## RETURN TO WORK DECISIONS & RISK ASSESSMENT

- ☐ Determine WHEN return to work is possible. Review [CDC/OSHA](#) guidelines along with guidance from local and [state](#) government.
- ☐ Complete a thorough risk assessment before reopening. [Click Here](#) for more information on conducting a Risk Assessment.
- ☐ Determine WHO should return to work.
  - Decide which employees may be able to return to the office.
  - Decide which employees will be prohibited from returning.
  - Decide how to handle higher-risk employees
  - Decide how to handle employees with caretaking obligations.
  - Administer leave laws and policies. Employers should consider the impact of the [paid leave requirements under the recently passed federal Families First Coronavirus Response Act \(FFCRA\)](#), as well as state and local laws that may be passed in direct response to the COVID-19 pandemic.
  - Employers should be thoughtful when returning furloughed or laid off employees.

## CREATING A PANDEMIC RESPONSE TEAM

- ☐ Identify a cross-functional team that recommends and oversees workplace protocols to mitigate and control the spread of COVID-19.
- ☐ Establish and communicate the expectations and responsibilities of all employees, including managers and supervisors.

## PREPARING TO BRING EMPLOYEE BACK TO WORK

- ☐ Create protocols for who is allowed to enter the workplace, including employees, customers, vendors and the outside public.



Make appropriate workplace modifications, including:

- Physical workspaces, including desks, workstations, and overall floor plan
- Change protocols for in-person interactions and physical contacts, including meetings & gathering, sharing workspaces, shift breaks and lunches, and travel bans.
- Change employee schedules if possible, including allowing only essential workers, encourage remote work when possible, staggering shifts.



Thoroughly clean and disinfect your office or building.

- Ensure all who are responsible for cleaning and disinfecting wear the proper PPE.
- Complete a general cleaning prior to disinfecting the office or building.
- Cleaning and disinfecting should go beyond the standard cleaning routine, paying close attention to entrances/exits, high-touch surfaces, employee workstations, electronics, lobby and conference room furniture and surfaces.
- Consider checking and changing your ventilation filters.



Establish employee-screening, exposure and confirmed illness protocols.

- Create screening procedures to identify potentially ill employees before they enter the office.
- Understand the security requirements, employee protections and documentation required for employee screenings.
- Exercise care in selecting a test to use, particularly in light of well-documented issues with test accuracy.
- Consider how to handle an employee's refusal to submit to a test.
- Determine when and under what conditions an employee who tests positive for COVID-19 will be able to return to the workplace.
- Review and understand any potential limitation on employer testing, including ADA, CDC, state health authority guidelines, OSHA and HIPPA.



Establish exposure and/or confirmed case protocols, including employee instructions for immediate self-quarantine.



Establish return to work considerations for employees who are symptomatic or tested positive.



Create and distribute employee safety training materials that cover the following:

- Social distancing guidelines
- Use of PPE
- Personal hygiene and etiquette
- Cleaning responsibilities
- Industry-and business-specific safety considerations



Change any workplace policies to adhere to new legislation and that better represents the new situation

## BRINGING EMPLOYEES BACK TO WORK



Consider reopening in phases that balances the workplaces needs along with the health and safety of employees. Depending on your business and location, this phased-in approach to reopening will vary.

- Ask employees to return to work (consider who is required vs. suggested), and gradually increase the number or employees permitted with the office or building as regulations evolve.



Leverage telecommuting and rotating schedules whenever possible.



Implement any screening or workplace protocols that were created prior to reopening.



Provide necessary manager and employee training to ensure every employee understands new policies, procedures and expectations.



Be transparent and communicate with employees so they know what to expect if/when a confirmed case happens.



Continue to follow new rules and regulations and be prepared to change your business practices if needed to maintain critical operations.



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*This document presents issues and questions that should be considered as companies evaluate their return to work policies, and is intended as general guidance only and should not be relied on as legal or medical advice.*

*Document last updated on 5/13/20*





## **Reopening Decisions and Risk Assessment**

While many essential businesses have remained open during the COVID-19 pandemic, other operations deemed nonessential have shut down temporarily or changed the nature of their operations. As we near a time when stay-at-home regulations are scaled back and businesses are allowed to resume as normal, employers should begin to prepare for re-starting normal work operations.

### ***DETERMINING WHEN RETURN TO WORK IS POSSIBLE***

The following are some best practices to keep in mind:

#### **Follow CDC and OSHA Guidelines**

It is important to review the guidance from [OSHA](#), the [CDC](#), state and local agencies, industry associations as well as your local health department.

#### **Review guidance from state and local government**

[CLICK HERE](#) to access the [general reopening plans and orders that have been issued at the state level thus far](#). Employers should bear in mind that these materials typically offer detailed instructions for reopening, which often vary by industry. As a result, it is important to review each order along with any accompanying official guidance to thoroughly understand all requirements and how they may impact each employer's operations. If you have a multi-state company, start with the strictest guidelines as your base, or adjust according to each state guidelines

#### **Understand the risk**

If and when the government allows all businesses to reopen, that doesn't necessarily mean COVID-19 is no longer a threat to your operations. Some businesses may have greater COVID-19 exposures than others, underscoring the importance of performing a thorough risk assessment before reopening. [CLICK HERE](#) for more information on conducting a risk assessment. If, after completing a risk assessment and reviewing local guidance—your organization determines it's safe to reopen, it's time to create your return to work action plan.

*Again, before reopening, it is critical to seek the expertise of legal, insurance and other professionals.*

## **DETERMINING WHO SHOULD RETURN TO WORK**

### **Decide which employees may be able to return to the office**

As restrictions loosen, government officials will likely provide guidance on what kind of operations may resume and in what ways. Such guidance may dictate phasing employees back to the office slowly, with a priority on those who need to be in the office to perform their duties. Once the relevant guidelines are set by the applicable authorities, employers will need to make additional decisions:

- Out of the group of employees who are legally permitted to return to the office, which employees will be asked to do so?
- Will those employees be required to return or asked to return if they feel comfortable doing so?
- Consider using anonymous surveys to gauge employees' concerns, willingness and feasibility to return to work.

### **Decide which employees will be prohibited from returning to the office**

Employers should also decide which employees will be prohibited from returning to the office, such as those currently experiencing COVID-19 symptoms and those who are still in home isolation due to actual or potential exposure due to COVID-19. All such decisions should be made after careful consideration of any guidance from the CDC and local health officials.

### **Decide how to handle higher-risk employees**

Employers will need to think through whether employees who are at higher risk of contracting COVID-19 should be asked, much less required, to return to the workplace. The CDC has identified a list of individuals who may be at higher risk and local health officials may have additional guidelines or restrictions with respect to such employees returning to work. Even if employers are permitted to ask such employees to return to work, they should be thoughtful about accommodating any concerns from such employees and ensure they understand and balance against potential violations of the Americans with Disabilities Act (ADA) and other anti-discrimination laws.

### **Decide how to handle employees with caretaking obligations**

Even after workplaces are permitted to reopen, it is possible that employees may have children whose schools or childcare facilities have not yet reopened. Employers will need to be prepared to respond to requests from such employees to either continue working from home or take a leave of absence in order to care for such children.

### **Administer leave laws and policies**

Consider how federal and state leave and disability laws and the employer's own policies may apply to employees who cannot return to the office or work remotely due to their own illness or health condition, that of a family member or caretaking obligations. Such employees may be eligible for paid leave under an employer's policy, short-term disability or paid family leave benefits through the state, or similar benefits through a private insurer. Employers should consider the impact of the paid leave requirements under the recently passed federal Families First Coronavirus Response Act (FFCRA), as well as state and local laws that may be passed in direct response to the COVID-19 pandemic.

### **Employers Should Be Thoughtful When Returning Furloughed or Laid Off Employees**

In industries where the workforce has been largely subject to furlough and layoff and employers are considering a staggered return-to-work schedule for their employees, employers should consider the impact that partial work may have on employee eligibility for unemployment insurance and the enhanced relief under the Coronavirus Aid, Relief, and Economic Security Act (CARES Act).

If a business has successfully obtained a loan under the federal Paycheck Protection Program (PPP loan), it must be sure to comply with the PPP loan use requirements if it plans to obtain forgiveness for the PPP loan as permitted under the CARES Act. For example, 75 percent of the forgiven amount must be used for payroll, and the loan forgiveness may be reduced if the borrower does not maintain or quickly restore staffing and employee salary levels (for salaries that are less than \$100,000 annualized and have been reduced by more than 25 percent).

Employers also should establish and follow a procedure for returning employees who have been formally separated from employment (as opposed to being placed on a paid or unpaid furlough).

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Many employee concerns may be alleviated by clearly communicating all of the steps the company is taking to protect them. The most successful back-to-work companies have been transparent about employee concerns and communicate that the health, wellbeing and safety of employees is the highest priority.





## Creating a Pandemic Response Team

To ensure that employees receive clear communications and that your company is on the same page when it comes to your return to work action plan, it's essential that you create a pandemic response team. A pandemic response team is a cross-functional team that recommends and oversees workplace protocols to control the spread of COVID-19. The scope and design of your team will vary depending on your specific business, but it should at least include the following roles: Team Leads, Prevention & Protocols, Sanitation & Disinfection, and Communication. [CLICK HERE](#) to access a sample Response Team document.

One of the first tasks your pandemic response team should address is outlining the responsibilities of your workforce. When it comes to ensuring a safe workplace during the COVID-19 outbreak, all employees have a role to play.

### Managers and Supervisors

Leadership, including managers and supervisors, should familiarize themselves with the details of the action plan. Above all, leadership must be prepared to answer questions from employees and set a good example by adhering to the guidance prescribed in the plan. This involves practicing social distancing and good personal hygiene.

### Employees

Employees play a critical role in your company's COVID-19 prevention efforts. To protect everyone returning to the workplace, outline a number of best practices that employees should follow:

**Understand the signs and symptoms of COVID-19, and stay home if they are feeling sick.** Any employee who is experiencing symptoms of COVID-19 (e.g., fever, cough, shortness of breath, sore throat, runny nose, body aches, chills or fatigue) should stay home. Individuals experiencing such symptoms should also be instructed to consult guidance from the CDC on seeking medical care.

**Practice good hygiene.** Employees should clean their hands often, with either an alcohol-based hand sanitizer or soap and water. Hand sanitizers should contain at least 60%-95% alcohol, and employees should wash their hands with soap for at least 20 seconds. In addition, employees should avoid touching their face and cough into their arm.

**Practice social distancing.** Social distancing is the practice of deliberately increasing the physical space between people to avoid spreading illness.





## **Preparing to Bring Employees Back to Work**

Before you reopen your business, you'll need to think about how you can do so safely. Most businesses will not be able to flip a switch and go from closed to open, but rather will need to reopen in phases. This section provides an overview of how to prepare for reopening.

### *Control Access*

Employers should consider who they want to allow into their workplace, including certain employee populations, customers, vendors and the outside public. Employers should designate areas that are on/off limits for each of these visitors and clearly communicate the access points. Employers should ensure all employees understand the new processes and can direct any permitted visitors accordingly.

### *Modifying the Workplace*

To prevent the spread of COVID-19 after reopening your business's doors, your company may need to make office modifications. These workplace modifications will most often be based on social distancing protocols, which may also be required by states or local orders as a condition of being permitted to reopen.

Your business's social distancing plan will be unique to your industry and nature of work, but public health experts point to three key factors to consider when creating a social distancing plan and making necessary workplace changes:

#### **Physical workspace modification**

Because COVID-19 spreads through close contact, employers may need to make changes to employees' desks or workstations, and overall floor plans. Some suggested changes include the following:

- Separating desks and workstations to ensure that there are 6 feet between each station
  - Adding partitions to open floor plans
- Closing common spaces, including conference rooms, break rooms and cafeterias
- Modifying high-touch surfaces (e.g., propping doors open) to avoid employees unnecessarily touching surfaces
- Posting signage around the office to remind employees of social distancing protocols
- Establishing contactless drop zones for all deliveries including mail, packages and food
  - Banning all workplace visitors and vendors

### **Workplace protocols**

To keep employees safe, your business will need to change protocols for in-person interactions and physical contact.

Some suggested changes include the following:

- Establishing and enforcing a crowd control plan to ensure that as few employees are in the building at once
  - Prohibiting in-person meetings whenever possible and encourage the use of virtual meetings instead
- Limiting the size of in-person gatherings to less than 10 people
  - Avoiding sharing workstations or equipment
- Staggering meal times and breaks to avoid having large groups of employees together at once
  - Banning all business travel until further notice

### **Employee scheduling**

To minimize the number of employees at work at any given time, changes to employee scheduling may need to be made and enforced. Some suggested changes include the following:

- Permitting only essential employees in the office
- Encouraging all other employees to work remotely
  - Staggering shifts
- Creating groups of employees that are to work together in shifts throughout the pandemic response

## ***Disinfecting the Workplace***

Before you reopen the workplace, you should clean and disinfect your office or building. Some professional cleaning services may be available to hire for a deep-clean and disinfection of your business. However, if you need to clean your office or building yourself before reopening, keep the following tips in mind.

### **Wear proper PPE**

Don't risk exposure or contamination while cleaning. Be sure to wear PPE, including gloves and a mask, while you're cleaning the workspace. Avoid touching your eyes, face or mouth, or any personal electronic devices, while you clean.

### **Clean first, then disinfect**

Disinfectant works best on already clean surfaces. As such, do a general cleaning before you start disinfecting the office or building. Go beyond the standard cleaning routine, and make sure to pay close attention to the following areas:

- Entryways and exits
- High-touch common surfaces (e.g., light switches and plate covers, doors, cabinets, sinks, stair railings, countertops, beverage machines, refrigerators and elevator buttons)
  - Employee workstations
    - Electronics
- Tables, chairs and desks, from the lobby to conference rooms

### **Disinfect all spaces with an EPA-registered disinfectant**

Double-check that the disinfectant being used is rated by the Environmental Protection Agency (EPA) and listed on EPA's List N: Disinfectants for Use against SARS-CoV-2, the virus that causes COVID-19. Disinfect all possible spaces, focusing on high-traffic and commonly touched surfaces.

### **Replace your air filter**

Increasing the ventilation and changing out old air filters can help promote workplace health. Talk to your building owner to learn more about the filters used in your HVAC systems.

Once your office or building is clean, work with the pandemic response team to establish a plan for daily cleaning of the space and promoting employee cleanliness. One of the best defenses against the spread of COVID-19 is keeping your workplace clean and regularly disinfected.

## ***Establishing Employee Screening, Exposure and Confirmed Illness Protocol***

Keeping employees safe should be a priority, and given the contagious nature of COVID-19, it may be in your company's best interest to implement formalized screening and exposure protocols.

### **Employee Screening Protocols**

To keep employees safe, consider conducting screening procedures to identify potentially ill employees before they enter the office. The Equal Employment Opportunity Commission permits employers to measure employees' body temperatures before allowing them to enter the worksite. Any employee screening should be implemented on a nondiscriminatory basis, and all information gleaned should be treated as confidential medical information under the Americans with Disabilities Act—specifically, the identity of workers exhibiting a fever or other COVID-19 symptoms should only be shared with members of company management with a true need to know. Be sure to notify employees that you will be screening them to avoid any surprises.

#### **Testing options**

- Employee Self-Assessment
- Provide on-site testing – either temperature or thermal
  - Drive- thru options outside the office
- Assembly line upon entering the office each morning or during shift changes

[CLICK HERE](#) to access the CDC's Testing Guidelines

### **Testing and Security Considerations**

Employers should only collect what is needed – documentation is critical. Information cannot be stored under employment health insurance without employee permission.

- Screening/testing for COVID-19 must be conducted on a nondiscriminatory basis, which likely means that all employees entering the worksite must be tested.

- Assuming the results of such testing are retained, they need to be retained as confidential medical records according to the ADA's requirements.
- Any screening, test or inquiry that is broader than necessary to address the potential direct threat is prohibited.
- Employers will need to consider how to handle an employee's refusal to submit to a test. Employers should have clear standards – for example, 100.4 is considered a temperature and will not be admitted into work. If employee refuses required health screening, ask them to leave work, document the refusal, and permit return only by official documentation of a test or if they agree to your testing.
- Be aware that there may be an obligation under wage and hour laws to pay employees for time spent waiting to be tested, as well as time spent waiting for the results of the test, assuming the employee will not be admitted to the workplace until the employer has the results.
  - Requiring employees to consent in writing to the screening, including, but not limited to, acknowledging that the test is not a diagnostic test.
- Exercising care in selecting a test to use, particularly in light of well-documented issues with test accuracy.
- Determining when and under what conditions an employee who tests positive for COVID-19 will be able to return to the workplace.
- Weighing the implications of a positive test result as it relates to addressing potential exposure in the workplace.

#### **Potential limitations on employer testing - FEDERAL GUIDELINES**

##### **ADA:**

General prohibition against employers conducting employee medical examinations – but seems open to authorization for COVID-19

##### **CDC & state health authority guidelines:**

Employers should immediately separate “sick” employees

##### **OSHA guidance:**

Employers should ID and isolate potentially infected individuals

##### **HIPAA**

Privacy rules may apply if information is obtained from a health care provider or if it is aggregated with health claims information

#### **Exposure and Confirmed Illness Protocol**

Employees who test positive for COVID-19 or believe they have been infected will be instructed to follow the advice of a qualified medical professional and self-quarantine. When self-quarantining, employees should:

- Stay away from other people in their home as much as possible, staying in a separate room and using a separate bathroom if available.
  - Not allow visitors.
- Wear a face mask if they have to be around people.
- Avoid sharing household items, including drinking cups, eating utensils, towels and bedding.
  - Clean high-touch surfaces daily.
- Continue monitoring their symptoms, calling their health care provider if their condition worsens.

**Notably, employees who are symptomatic or who have tested positive should not return to work until the conditions outlined in the following table are met:**

| Return to Work Considerations   |   |
|---|---|
| Employee was symptomatic but not tested for COVID-19.   | Employee was tested for COVID-19.   |
| <p>The employee may return to work if:</p> <ul style="list-style-type: none"> <li>• They have not had a fever for at least 72 hours and have not used fever-reducing medication during that time.</li> <li>• Coughs and other symptoms have improved.</li> <li>• Seven days have passed since they first experienced symptoms.</li> </ul> | <p>The employee may return to work if:</p> <ul style="list-style-type: none"> <li>• They no longer have a fever.</li> <li>• Coughs and other symptoms have improved.</li> <li>• They have received two negative COVID-19 tests in a row.</li> </ul> |

When an employee tests positive for COVID-19, deep-cleaning procedures will be triggered. Furthermore, employees who have been in close contact with an individual who has tested positive for COVID-19 will be instructed to self-quarantine.

### *Creating Employee Safety Training Materials*

The success of your return to work action plan, no matter how well-thought-out and comprehensive it may be, is largely contingent upon how well your employees follow your health and safety guidance. Your employee safety training materials should cover the following topics.

### **Social Distancing Guidelines**

Ask employees to follow social distancing best practices throughout your facilities, including but not limited to cafeterias, common areas and office spaces. Specifically, encourage employees to:

- Stay 6 feet away from others when working or on breaks. Where a minimum distance cannot be maintained, engineering or administrative controls will be in place.
- Avoid job tasks that require face-to-face work with others when possible. If this is unavoidable, employees will be provided with face masks, face shields, physical barriers and other workplace controls to ensure their safety.
- Avoid contact with others whenever possible (e.g., handshakes).
- Avoid touching surfaces that may have been touched by others when possible.
  - Distance themselves from anyone who appears to be sick.
- Avoid gathering when entering and exiting the facility. Employees should also only enter and exit designated areas.
- Follow any posted signage regarding COVID-19 social distancing practices.
  - Disinfect their workspace often.
  - Avoid touching their face.
  - Avoid nonessential gatherings.

### Use of PPE

If you've determined that your employees should use PPE while at work, be sure to explain best practices for its use. For example:

- **Gloves**—Employees may contract COVID-19 by touching contaminated surfaces and then touching their face. Gloves are an effective way to prevent COVID-19 from getting on an employee's skin. They are also a good reminder for employees not to touch their face.
- **Face shields, face masks and eye protection**—Viruses can be transmitted through the eyes and mouth via tiny viral particles known as aerosols. Face shields, face masks and eye protection can help protect employees from these particles.

At a minimum, your return to work action plan should include guidance for employees to understand how to put on, take off and care for any PPE provided to them.

### Personal Hygiene and Etiquette

Your employee safety training materials should include guidance for employees as it pertains to personal hygiene and etiquette to prevent the spread of COVID-19. Specifically, you should include guidance for the following:

- **Respiratory etiquette and hand hygiene**—Encourage good hygiene to prevent the spread of COVID-19. This can involve: Providing tissues and no-touch disposal receptacles; Providing soap and water in the workplace; Placing hand sanitizers in multiple locations to encourage hand hygiene; Reminding employees to not touch their eyes, nose or mouth
- **Staying home when sick**—Encourage employees to err on the side of caution if they're not feeling well and stay home when

they're sick or are exhibiting common symptoms of COVID-19  
(e.g., fever, cough or shortness of breath).

### **Cleaning Responsibilities**

Because COVID-19 can remain on surfaces long after they've been touched, it's important that your business frequently cleans and disinfects the facility. Employees should be responsible for ensuring that they do their part in workplace cleanliness. Some best practices to promote cleanliness include:

- Discouraging workers from using other workers' phones, desks, offices, or other tools and equipment, when possible. If necessary, clean and disinfect them before and after use.
- Providing disposable wipes so that commonly used surfaces can be wiped down by employees before each use.

### **Industry-and Business-specific Safety Considerations**

Be sure to also include any industry- or business-specific safety training materials in your return to work action plan. Please refer to [OSHA](#) for more detailed information regarding this guidance.

### ***Reviewing Workplace Policies***

The COVID-19 pandemic has resulted in employers across the country needing to change their workplace policies to adhere to new legislation and to better represent their newfound situation. As such, your company should review its workplace policies to ensure that they're in line with your return to work action plan and in compliance with any applicable laws.





## Bringing Employees Back to Work

When you are ready bring employees back, you should do so in a manner that balances your business needs and the health and safety of employees. As such, consider reopening in phases, and be sure to provide ample employee communications throughout the entire process. Depending on your business and location, this phased-in approach to reopening will vary.

Following are recommendations and considerations employers should consider as they phase in employees:

- You will need to keep state and local guidance related to social distancing in mind when reopening your business.
  - Consider asking only essential employees to return to work.
- As regulations begin to permit allowing larger gatherings, incrementally increase the number of employees permitted within the office or building.
- Whenever possible, leverage telecommuting and rotating schedules to keep employees safe.
- Be sure to implement any screening or workplace protocols that were created prior to reopening your business.
  - Provide any necessary managerial or employee training to ensure that employees understand how they can do their part in preventing the spread of COVID-19 once your business reopens.
- Consider distributing an employee version of your return to work action plan to be as transparent as possible.
- Be transparent with employees, communicating expectations and the steps you are taking to protect them while they are at work.

Due to the nature of the COVID-19 pandemic, rules and regulations are constantly changing. Employers should be prepared to change their business practices if needed to maintain critical operations. Depending on how the pandemic progresses, employers may need to make changes to their return to work action plan, suspend operations again or add additional safety measures.



## Cottingham & Butler Resources

While resuming operations following the COVID-19 pandemic may seem like a daunting task, businesses do not have to go it alone. Cottingham & Butler has provided the following resources to support your transition.

[Sample Coronavirus Response Letter](#)

[Sample Employee Policies & Procedures Letter](#)

[Sample Communication Letter to Employees Regarding Temperature Testing at Worksite](#)

[Sample Essential Workers Verification Letter](#)

[Sample Telecommuting Policy](#)

[Sample Emergency Paid Sick Leave Policy](#)

[Required FFCRA Notification FAQs](#)

[Emergency Family and Medical Leave Expansion Act – Leave Request Form](#)

[Sample Letter – Workplace Exposure to a Communicable Disease Sample Letter](#)

[Workplace Hygiene](#)

[Critical Workers – Implementing Safety Practice](#)

[Sample Workplace Coronavirus Infection Email to Employees](#)

[Workplace Protection Considerations](#)

[Statewide Return to Work Protocols](#)

[Business Pandemic Influenza Planning Checklist](#)

[Infectious Disease Control Policy](#)

[Crisis Management Services](#)

[CDC Guidance for Employees Following a COVID-19 Diagnosis or Exposure](#)

[OSHA COVID-19 Workplace Guidance](#)

[Office Stretches – SMSC \(Safety Management Services Company\)](#)

For more questions or more information, contact your Cottingham & Butler representative.

[Access Cottingham & Butler Client Resource Center](#)