

COVID-19 Safe Operations Checklist



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As the country, states, and local municipalities move into the next phase of the COVID-19 battle, some state Shelter-in-Place Orders are being lifted with more being lifted over the next month, printing operations need to turn their attention to ensuring they maintain safe operations and can bring additional staff back to work. Many printing operations have been running with reduced staffing with many employees either working from home, working less hours, or been temporarily laid off.

The following checklist highlights some of the many factors that printing operations should consider:

1. Government Orders

Monitor the applicable state and municipal re-opening orders and industry-specific requirements. These orders will determine the appropriate time frame for returning to work and the conditions that must be met. For example, many of the orders are requiring employees to wear face coverings and some are requiring daily temperature checks of employees.

2. Health and Safety Risk Assessment

Conduct a COVID-19 risk assessment at each worksite and create or refine an existing mitigation plan identifying exposure risks. The risk assessment needs to consider how employees will interact with each other during the day as well as visitors and delivery personnel.

The policies that should be considered include physical distancing measures such as physical modifications to the worksite, physical barriers where appropriate, revised work practices, reducing workforce density, and employee training on appropriate interactions, worksite cleaning and disinfection procedures, protective coverings and personal hygiene requirements or recommendations, health screening protocols for employees and visitors, and protocols for addressing COVID-19 cases.

3. Physical Distancing Actions

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- Stagger start times for employees to prevent interaction and congregation as they report to and leave the facility.
- Space shift changes at least 10 minutes apart to prevent shift cross-contamination.
- When appropriate, use teleworking options for qualifying employees.
- Consider having employees return to work on alternating days or staggered schedules so the number of employees in the office at the same time is reduced.

- Stagger lunch and break times. Close break rooms, or redesign them to maximize distance between tables, vending, appliances, etc. Space chairs 6-10 feet apart and mark floors where chairs should be placed.
- Limit attendance at meetings and ensure employees can sit or stand at least six feet apart in conference rooms or other meeting areas.
- Schedule cleaning immediately following any gathering in conference or meeting rooms. Do not conduct back-to-back meetings to avoid unnecessary employee contact and to provide time to immediately sanitize the meeting room after use.
- Install physical distancing decals on the floors of any shared spaces in the workplace to keep people six feet apart.
- Place physical markers or decals in high traffic areas to keep people six feet apart.
- Post physical distancing reminders throughout the workplace.
- Post signs to limit the number of people allowed in common rooms and spaces at a given time such as bathrooms, conference rooms, dining areas, elevators, etc.
- Post signs directing the flow of traffic in tight high-traffic areas to indicate one-way travel.
- Review the bathroom design. When possible, extend bathroom stall walls and doors from floor to ceiling. If floor-to-ceiling barriers cannot be installed between bathroom stalls and urinals, then block off certain stalls and urinals to allow for adequate space between units.
- Determine the capacity of the bathroom that allows for proper physical distancing and post limits accordingly.
- Transition to an electronic clock system. If that is not possible, designate one person to clock employees in and out of work or record their arrival and departure times if clocking in would otherwise require employees to be in close contact with each other or to touch the same equipment.
- Encouraging employees with private offices to remain there as much as possible.
- Restructure open floor layouts to ensure that employees can work at least six feet away from each other. If physical distancing is not possible, install physical barriers to prevent employees from close contact with each other.
- Increase air exchange rate in the building and whenever possible, locate air exchange vents away from employee work stations.
- Install clear barriers between workspaces, in reception areas, or between customers and employees that can be easily cleaned and are high enough to prevent contact.
- Adopt videoconference guidelines so that even when in the office, employees are discouraged from meeting in person.
- Train employees to refrain from physical contact, such as handshakes or personal exchanges of materials.

- Eliminate nonessential business travel. For essential business travel, consider alternatives when such travel is to locations with ongoing COVID-19 outbreaks as identified by CDC travel warnings and other trusted public health authorities.
- Limit out-of-office business meetings to only those that are essential. Train employees to practice measures to prevent contamination when at business meetings, including no physical contact, physical distancing, and wearing a face cover.
- Limit one person to a vehicle, if possible.
- Have products and supplies delivered through curbside pick-up or delivery.
- Require all visitors to verify their health status prior to entry through targeted inquiry, and to be given access only to areas necessary for purposes of the visit.

4. Sanitation and Hygiene Measures

To minimize the risk of COVID-19 transmission, certain good hygiene and infection control practices are being recommended by the [Centers for Disease Control](#) and the [Occupational Safety and Health Administration \(OSHA\)](#). The [U.S. Environmental Protection Agency \(EPA\)](#) has issued guidance on disinfectants for use against COVID-19, and the CDC has issued guidance on cleaning and disinfecting workplaces, which employers should follow.

For any employee expected to use cleaners and disinfectants, they need to be trained under OSHA's Hazard Communication Standard and Personal Protective Equipment Standard in the hazards associated with the chemicals and how to properly use the designated personal protective equipment. Document all training and other instructions provided to each employee.

SGIA has also created a [sanitation guide](#) based on the CDC recommendations. The sanitation guide provides additional information on cleaning and sanitizing the workplace.

These measures include:

- Post signs reminding employees to not touch their face, particularly eyes, nose, and mouth with their hands.
- Promoting frequent hand washing [20-second hand-washing rule](#) and making soap and running water readily available.
- Place hand-sanitizer stations at strategic locations around the facility.
- Train employees to cover their coughs and sneezes.
- Provide tissues and no-touch, lined, lidded, garbage cans.
- Require workers to stay home when they are ill or have been exposed.
- Prohibit shared personal work equipment, if feasible, such as desks, telephones, headsets (or any other equipment that will touch the face), computers, and work tools.
- Keep sanitizing products next to shared work equipment and require cleaning and disinfect such items immediately after use.
- Train employees to disinfect common surfaces following use as such as microwaves, vending machines, refrigerator handles.

- Implement routine and careful cleaning and disinfecting of frequently touches surfaces such as including drinking fountains, elevator buttons, doorknobs, light switches, handrails, kitchen and breakroom or lunchroom appliances, coffee pots, counter tops, drawer pulls, tables, sinks, faucets, toilet handles, push plates, phones, keys, remote controls, desks, chairs, printers, keyboards, computer mice and thermostats.
- Have employees or dedicated personnel conduct routine and careful cleaning and disinfecting of work areas, surfaces, and equipment.
- Where feasible, prop open all doors to minimize the touching of door handles, knobs, and push plates. When not feasible, provide paper towels or other similar wipes and a waste container to allow the doors to be opened or closed without out contacting the handle.

Consider installing automatic door and light openers to minimize touching of these common surfaces.
- Consider suspending or reconfiguring security practices that require touching frequently touched surfaces, such as PIN-entry devices, thumbprint scanners, time clock stations, and in sign-in books.

5. Personnel Issues

Due to declaration of a coronavirus pandemic, employers are provided greater leeway under the regulations and permitted to make certain medical inquiries which would otherwise be impermissible. The U.S. [Equal Employment Opportunity Commission](#) (EEOC) have issued guidance allowing employers to take employees' temperatures, send employees with coronavirus symptoms home, ask employees if they are experiencing symptoms of coronavirus, and ask employees why they are taking sick leave.

The EEOC issued additional guidance allowing employers to test employees for COVID-19 before allowing them to return to work. While employers may also require a note certifying fitness for duty in order to return to work, the EEOC cautions that many medical offices are overloaded and employees may have difficulty obtaining testing or fit-for-duty letters from medical professionals. Accordingly, flexibility and best judgement under the circumstance must be exercised.

- Require employees to work from home or to take leave if an employee has symptoms of COVID-19 or has been diagnosed with COVID-19 in the past 14 days. Employees may only return to work in the facility if cleared by a medical professional and has twice tested negative for COVID-19, 72 hours apart.
- Because printing operations have been designated as an essential business, if an employee has been exposed to COVID-19 and is asymptomatic, the company can follow [the CDC guidance for safety practices for critical infrastructure workers](#).
- Require any employee who becomes sick or displays COVID-19 symptoms during the employee's work shift to go home immediately. If it is not possible for the employee to go home immediately, the employee must self-isolate until able to leave work. The surfaces of the workplace should be cleaned immediately by a person in appropriate PPE, and the work area should be isolated for at least 24 hours.

- Consider screening daily all employees for respiratory and other symptoms such a temperature. **(Some states and local municipalities are requiring temperature screening of essential workers, such as those in printing operations.)** Unless the temperature of employees can be performed discreetly, temperature screenings need to take place in a private room and that the recording of temperatures is treated as a confidential medical record under the ADA. If an employer cannot find an infrared/forehead thermometer, it may require employees to take their temperatures at home and attest that they do not have any fever or elevated temperature.
- Employers may also require and administer COVID-19 testing to employees, however the limited availability of tests may make this difficult to accomplish.
- Consider requiring employees to wear face coverings. **(Some states and local municipalities are requiring essential workers, such as those in printing operations, to wear face coverings.)** The EEOC issued guidance stating that an employer may require employees to wear protective gear (e.g., masks and gloves) and observe infection control practices (e.g., regular hand washing and physical distancing protocols). If masks and face coverings are required, they need to be provided by the employer. Masks and face coverings are regulated by OSHA and as a minimum, employees must be given a copy [Appendix D](#) Information for Employees Using Respirators When Not Required Under the Standard. It contains information about the proper use and limitations of these types of respirators. If employees are given an N95 mask, this is a respirator and a formal respirator program is required to be implemented.
- Where an employee is unable to wear a face mask due to a medical issue or a disability, the employer must make a related reasonable accommodation pursuant to the Americans with Disabilities Act. For instance, accommodations such as non-latex gloves, modified face masks for interpreters or others who communicate through lip reading, or individuals with autism who cannot tolerate face coverings. For a religious accommodation under Title VII (such as modified equipment due to religious garb), the employer should discuss the request and provide the modification or an alternative if feasible and is not an undue hardship and the accommodation does not pose a direct threat to the employee or others.
- Whenever possible, accommodate employees who are at higher risk for severe illness, as [defined by the CDC guidelines](#). Accommodations may include work assignments that may have lower risk of exposure to the virus, or teleworking arrangements, if requested by the employee. Do not prevent employees in higher-risk populations from returning to work if they wish to do so.
- For employees that are not in the higher-risk populations and are reluctant to report to work, try and accommodate the request, but an employer can mandate attendance and take appropriate disciplinary action for workers for violating its attendance policy. Depending upon the employee, putting them on leave or using existing time-off policy, which typically requires approval to use vacation or PTO may be a better choice than termination.

- Employees can refuse to work if they reasonably believe they are in imminent danger, according to the Occupational Safety and Health Act. They must have a reasonable belief that there is a threat of death or serious physical harm likely to occur immediately or within a short period for this protection to apply. An employee can refuse to come to work if:
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 - o The National Labor Relations Act grants employees the right to join together to engage in [protected concerted activity](#). Employees who assert such rights, including by joining together to refuse to work in unsafe conditions, are generally protected from discipline.
 - o The Americans with Disabilities Act requires employers to reasonably accommodate employees who request altered worksite arrangements, remote work or time off from work due to underlying medical conditions that may put them at greater risk from COVID-19. The [EEOC's guidance on COVID-19 and the Americans with Disabilities Act](#) notes that accommodations may include changes to the work environment to reduce contact with others, such as using Plexiglas separators or other barriers between workstations.
 - o The Families First Coronavirus Response Act (FFCRA) allows an employee to self-quarantine if a health care provider advises an employee to do so because the employee is particularly vulnerable to COVID-19. The FFCRA applies to employers with fewer than 500 employees, and the quarantine must prevent the employee from working or teleworking. [FFCRA regulations](#) permit employers to require documentation for paid sick leave.
- Any employers taking temperatures, administering COVID-19 tests, or asking employees about symptoms should maintain all information collected as a confidential medical record in compliance with the Americans with Disabilities Act, the Health Insurance Portability and Accountability Act, and state and federal privacy laws.
- Establish a communication channels for employees to address concerns and address any health and safety concerns brought by employees promptly.
- Remind employees and management that discrimination and retaliation to concerns raised about safety or other matters is strictly prohibited.

Remain current on changes to government orders and recommendations by public health officials. Open communication with employees is important to maintain trust and to best protect employees' health, safety, and legal rights.

If you have any questions or need additional information, please contact the Printing United Alliance Government Affairs Department at govtaffairs@sgia.org.

Interested in learning more about implementing a formal prevention and response plan?

Head to <https://www.sgia.org/covid-19/preparedness-and-response-plan> to download the full COVID-19 Preparedness and Response Plan.



WHO WE ARE

About PRINTING United Alliance

PRINTING United Alliance is the new entity borne of the merger between Specialty Graphic Imaging Association (SGIA) and Printing Industries of America (PIA). In a milestone in the printing industry, on May 1, 2020, SGIA and PIA officially combined to create the largest, most comprehensive member-based printing and graphic arts association in the United States.

Members now have unparalleled access to preeminent education, training, workshops, events, research, government and legislative representation, safety and environmental sustainability guidance, as well as resources from the leading media company in the industry – NAPCO Media.

PRINTING United Alliance produces the PRINTING United Expo and Conference, the three most important days in printing. This year, PRINTING United takes place in Atlanta on October 21-23, 2020. This expansive display of printing technologies and supplies, education, programming, and services are showcased to the industry at large, and represents all market segments together under one roof. For more information, visit PRINTINGUnited.com.