Monday, June 8, 2020

The U.S. Centers for Disease Control and Prevention (CDC) has published new guidance for office building employers, building owners and managers, and building operations specialists to assist employers in creating a safe workplace as they resume in-person operations. Building upon previously issued interim guidance for businesses and employers, the new guidance recommends additional measures to assist with the development of reopening plans.

**Key Recommendations**

**Evaluate readiness for occupancy.** The CDC recommends an evaluation of the workplace to ensure it is ready for a return to in-person operations, including an assessment of workplace ventilation systems and identification of hazards.

Specifically, the CDC recommends employers:

- Ensure that HVAC systems operate properly by following inspection and maintenance guidance provided in ANSI/ASHRAE/ACCA Standard 180-2018
- Use HEPA filtration and run the ventilation system even when no one is in the building to enhance air cleaning and encourage dilution
• Improve ventilation with increased circulation of outdoor air by opening windows and doors if practical and safe

• Assess the workplace to identify hazards that could increase the potential for COVID-19 exposure, e.g., identifying work and common areas and means of ingress and egress where employees may be in close proximity to one another.

**Implement engineering controls.** The recommendations include implementation of controls intended to minimize areas of close contact and high-touch surfaces, such as:

• Arranging seating, furniture and workstations and installing physical barriers to allow for six feet of separation between employees
• Installing visual markers such as tape on the floor to help employees maintain a distance of six feet where physical barriers are not feasible
• Regularly and consistently cleaning and disinfecting high-touch surfaces
• Minimizing high-touch surfaces in communal areas by providing single-serve items for coffee and snacks.

**Alter methods of work.** Several administrative controls also are recommended to change the way employees work in the building, including:

• Monitoring employees for symptoms of COVID-19 with temperature screenings
• Encouraging employees with symptoms to remain at home and get tested
• Staggering shift, start and break times to limit the number of employees in the workplace and common areas
• Educating employees through regular communications and the posting of signs inside and outside of the workplace
• Allowing sufficient time for employees to wash their hands
• Having employees wear face coverings in all areas of the workplace.

Although implementation of the various recommendations is not mandatory, employers should incorporate the measures applicable to their operations to minimize the risk of future claims of unsafe workplaces and to assist COVID-19 mitigation efforts. Employers also should ensure compliance with directives issued by state and local authorities, which can be found at the COVID-19 websites of each jurisdiction highlighted below. Employers should consult legal counsel regarding specific circumstances that may arise in the jurisdictions of their workplaces.

**COVID-19 Directive Websites**

• [Alabama](#)
• [Alaska](#)
• Arizona
• District of Columbia
• California
• Colorado
• Connecticut
• Delaware
• Florida
• Georgia
• Hawaii
• Idaho
• Illinois
• Indiana
• Iowa
• Kansas
• Kentucky
• Louisiana
• Maine
• Maryland
• Massachusetts
• Michigan
• Minnesota
• Mississippi
• Missouri
• Montana
• Nebraska
• Nevada
• New Hampshire
• New Jersey
• New Mexico
• New York
• North Carolina
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