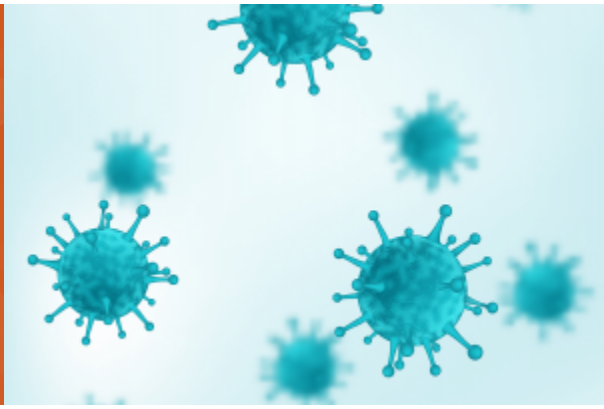
COVID-19 Alert: The Guide

OSHA Publishes Guidance on Returning to Work

June 26, 2020



On June 18, 2020, the Occupational Safety and Health Administration (OSHA) published Guidance on Returning to Work (the "Guide"). The Guide, just as with other recent COVID-19-related OSHA publications, was published as *recommendations* meant to assist employers, and does not impose new regulations or standards.

The Guide supplements OSHA's previously published Guidance on Preparing Workplaces for COVID-19, and expands on the three-phased re-opening approach articulated in the White House's Opening Up America Again:

- *Phase 1*: Businesses should encourage telework where feasible. Where not feasible, businesses should consider limiting the number of people in the workplace to maintain proper social distancing. Flexibilities and accommodations for employees who are at high-risk of contracting the virus should be considered.
- *Phase 2*: Businesses should continue to allow telework but can begin to ease up on social distancing protocols at the workplace.
- *Phase 3*: Businesses may resume without restrictions at the workplaces.

The Guide then identifies nine key areas employers should assess when creating their re-opening plans, and provides examples to guide employers in each area:

- *Hazard assessment*
- *Hygiene*
- *Social distancing*
- *Identification and isolation of sick employees*
- *Return to work after illness or exposure*
- *Controls*
- *Workplace flexibilities*
- *Training*
- *Anti-retaliation*

The Guide is not meant to cover every scenario or to provide the only solution to the various challenges that businesses may encounter when re-opening. Employers reviewing the Guide should keep in mind that that the Guide provides recommendations that should be read in the context of local re-opening regulations and recommendations from the CDC. It is important to

keep up-to-date with the state and local orders and implement those directives within this framework provided by OSHA.

For more information, please contact the Employment Group.