Reopening Considerations and Support Resources

The Epicenter team has developed a checklist of additional considerations and resources that complements the Back to Business Framework and aims to help entrepreneurs identify questions they can ask and resources they can access as they consider whether or not to reopen or prepare to reopen. The resources and considerations from local and national experts highlighted in this document map to the City of Memphis COVID19 Compliant Protocol (CCP) and are responses to questions we were beginning to hear from entrepreneurs and partners in our community as they considered how to reopen their businesses.

Included in this document:

**Section 1:** Considerations when navigating the City of Memphis COVID19 Compliant Protocol (CCP) and Back to Business Framework. This section includes guidance for creating a reopening strategy, obtaining signage, employee health, customer health, and facility safety

**Section 2:** Links and additional support resources

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**Section 1**
Considerations when navigating the City of Memphis COVID19 Compliant Protocol (CCP) & Back to Business Framework

1. **CREATING A REOPENING STRATEGY**

All essential and nonessential businesses should create a multi-phase reopening strategy that aligns with the CCP framework. Use the CCP framework to determine restrictions and conditions unique to your sector of business.

- Questions to consider:
  - Does your business fall into multiple sectors?
  - Is it unclear which sector your business fits into?

- Consider consulting with a legal professional to determine which regulations and considerations to abide by.
Check with state certifying and/or licensing agencies where applicable for best practices, resources, and additional requirements (i.e. State Cosmetology Board)

Helpful Links:
- Prepare your Small Business and Employees for the Effects of COVID-19 (CDC)
- Guidance of Preparing Workplaces for COVID-19 (OSHA)
- Preparing to Reopen guide (SBDC)

2. SIGNAGE

Consider hiring a sign professional. A sign professional might also assist in sign design, manufacturing, and installation.

- Ensure that you develop a plan for how to display the full COVID-1 Compliant Protocol for customers/employees.
- Plan for any additional costs of signage.

3. EMPLOYEE HEALTH

It's critical to train your employees on the new health guidelines established for your business. Let employees know that you are taking this protocol seriously to protect employee and visitor health.

- Be prepared to certify to the local health department that you have a written plan that you can reliably perform.
- Encourage employees to get tested if they are experiencing COVID-19 symptoms.
  - If employees need help locating testing locations, share with them the COVID-19 Testing Sites in Shelby County webpage for local testing sites.
- If you keep a log of employees’ COVID-19 screening results, ensure that you maintain confidentiality of this medical information and store it separately from personnel files, as detailed by the (EEOC).
- Plan a response strategy/procedure for when employees become sick and/or exposed to COVID-19. Things to consider and helpful links:
  - Outline steps you will take after employee exposure (considerations from the FDA)
  - Have a plan in place to fill in for absent employees (consider scenarios in which a single employee is exposed and multiple employees are exposed).
If an employee discloses that they have confirmed COVID-19 infection, employers must uphold the employee’s right to privacy under HIPAA while informing fellow employees of their potential exposure, per the CDC.

Steps for Employees who Become Sick (CDC)
Steps for Employees who are Caring for Someone who Becomes Sick (CDC)

○ If your employees will require face coverings, ensure that you have sourced masks or face covering materials to provide to employees. Helpful links:
  ■ Information on how to wear and wash Face Clothes & Masks (CDC)
  ■ When & How to Wash Your Hands (CDC)
  ■ Who’s Selling Face Masks in Memphis? (Choose901)

○ Actively encourage sick employees to stay home. Develop policies that encourage sick employees to stay at home without fear of reprisals, and ensure employees are aware of these policies.

○ Consider revising your vacation, paid time off, attendance, travel and/or leave policies. You might consider the following:
  ■ Developing other flexible policies for scheduling and telework (if feasible)
  ■ Creating leave policies to allow employees to stay home to care for sick family members or care for children if schools and childcare facilities are closed

○ Consider asking your employees before reopening if they need special accommodations. It is important that employees self-report pre-existing medical conditions or risk factors and personally request accommodations. As you, the employer, do not want to target, single out or assume specific employees are “high-risk” as this may conflict with anti-discrimination laws outlined by the EEOC, Americans with Disabilities Act (ADA), and Rehabilitation Act.

○ Consider listing the risk factors highlighted by the CDC for all employees, and ask if accommodations will be necessary.

4. CUSTOMER HEALTH

● Ensure that you develop a plan for how to display the full COVID-1 Compliant Protocol for customers/employees.
● Consider surveying your customers to discover what additional health protocols they would like to see in effect before they return to your business.

● Consider discouraging handshaking between employees and clients/customers

● Ensure that you have designated someone as the person who will clean and sanitize surfaces that employees and customers touch

● Ensure that you are using the correct disinfectants for your facility. Helpful links:
  ○ Cleaning and Disinfecting Your Facility (CDC)
  ○ List of Disinfectants to use Against COVID-19 for Hard & Soft Surfaces (EPA)

5. FACILITY SAFETY

● Consider conducting an evaluation of your facility to identify and apply operational changes in order to maintain six feet of separation and begin “no touch” services (such as deliveries that don’t require close contact, etc.)

● Consider any system or operation changes you may need to make to maintain social distancing. Questions to consider:
  ■ What system changes can you make to prevent customers from gathering or clustering in a given area? (E.g. removing dining chairs)
  ■ Will you entrust visitors and employees with maintaining six feet of separation or will you assign an employee to ensure this is carried out consistently?

● Consider setting up signage to direct traffic flow in a clockwise manner.

● Consider creating a screening policy for third party vendors.

● Consider adding high efficiency air filters and increasing air filtration (if possible).

● Consider which office or business equipment is shared and select automated alternatives to each that minimize unnecessary contact. Questions to ask:
  ■ Do your employees share office equipment such as staplers, hole punchers, and pens?
  ■ How can you minimize use of these objects?

● Establish the frequency (e.g. 3 times per day) in which you will clean and disinfect break rooms, restrooms, other common areas and “high-touch surfaces”. Things to consider:
Determine who will clean these areas. Will it be a current employee(s) or hired custodial/cleaning staff? If you hire a cleaning staff, consider asking for certifications to ensure they are using CDC-recommended cleaning supplies.

Consider assigning a person to rotate throughout the workplace to clean and disinfect surfaces.

Keep an accurate log of your cleaning schedule (times, by whom, etc.) & consider posting it for employees to see.

Post signs asking employees and guests to sanitize high-touch areas before and after use.

Determine how you will source and purchase appropriate volumes of disinfectant, hand sanitizer, soap and related supplies given reported shortages.

Reconfigure the layout of your facility to ensure employees/customers can maintain a safe distance of six feet from one another, or put impermeable barriers in place at employee workstations.

- **Measures to ensure physical separation in the office**, (Cushman & Wakefield)
- **Separate employee workstations with desk dividers**.
● Determine how you will follow occupancy percentage rules outlined in the Back to Business framework.

○ Questions to consider:
  ■ Will you task a current employee with counting visitors and monitoring facility occupancy or will you hire someone new?
  ■ Based on your facility, what maximum number of visitors satisfies the occupancy percentages outlined for each phase?
  ■ Will you put an occupancy limit on conference rooms or close them entirely?

Section 2:
Links and additional support resources

Shortcuts to Important Links
(many are included in the “Additional Considerations” section)

● Cleaning and Disinfecting Your Facility (CDC)
● List of Disinfectants to use Against COVID19 for Hard & Soft Surfaces (EPA)
● Steps for Employees who Become Sick (CDC)
● Steps for Employees who are Caring for Someone who Becomes Sick (CDC)
● Information on how to wear and wash Face Clothes & Masks (CDC)
● When & How to Wash Your Hands (CDC)
● Prepare your Small Business and Employees for the Effects of COVID-19 (CDC)
● Guidance of Preparing Workplaces for COVID-19 (OSHA)
● Measures to ensure physical separation in the office. (Cushman & Wakefield)
● Separate employee workstations with desk dividers. (Acoufelt)
● Who’s Selling Face Masks in Memphis? (Choose 901)
● What You Should Know about COVID-19, the ADA, the Rehabilitation Act, and other EEO Laws (Equal Employment Opportunity Commission (EEOC))
FOOD & AG SPECIFIC RESOURCES

- [Best Practices for Food Retail, Food Delivery, and Restaurants](FDA)
- [What to Do if You Have COVID-19 Confirmed Positive or Exposed Workers in Your Food Production, Storage, or Distribution Operations Regulated](FDA)
- [Use of Respirators, Facemasks, and Cloth Face Coverings in the Food and Agriculture Sector During Coronavirus Disease (COVID-19) Pandemic](FDA)
- [Additional Food Safety COVID19 Resources](FDA)
- [What Grocery and Food Retail Workers Need to Know about COVID-19](CDC)

OTHER INFORMATION, GUIDES, AND RESOURCES

- [EEOC guidelines regarding workplace anti-discrimination laws in the midst of COVID-19](SBDC)
- [Tips for Businesses on Responding to the Impact of the COVID-19 Pandemic](SBDC)
- [Department of Labor COVID-19 Resource Page](SBDC)
- [Return to Work Protocol: What Employers Need to Know](Baker Donelson; register in order to receive the recorded session from April 28, 2020)
- [Coronavirus (COVID-19): What You Need to Know](Baker Donelson)
- [Recovery Readiness, A How-To Guide for Reopening Your Workplace](Cushman & Wakefield)
- [Local Listing of Sanitation Products, Signage, and PPE Suppliers](Greater Memphis Chamber)